

**APPENDIX 2**  
Summary of Pre and Post  
Draft Submissions

## Appendix 2: Summary of Pre-Draft Submissions

	<b>COMMENTS</b>
<p><b>Treasury Holdings</b></p> <p>Relating to Ballymun Town Centre and Stillorgan</p>	<ol style="list-style-type: none"> <li>1. Ballymun Town Centre and Stillorgan District Centre should be designated as Metropolitan Area Level 3 Town Centres; their current roles and functions are that of town centres and have a wide range of retail, civic, community and social facilities. The right designation is required so that strategic retail planning can be progressed with certainty.</li> <li>2. There are a range of interpretations of what district centres comprise between local authorities in the GDA and this matter is not assisted by the definition in the RPG. Therefore the Retail Strategy should provide clear and unequivocal guidance.</li> <li>3. There is lack of clarity on the size threshold of a district centre within the GDA and is thus open to interpretation.</li> <li>4. With regards to size threshold of a district centre, it is not recognised that the RPG is not setting a cap or being overly prescriptive in respect of size threshold.</li> <li>5. There are widely differing interpretations of what 'Level 3 Town and/or District Centres' should be by the different local authorities.</li> <li>6. The only designated Metropolitan Area Level 3 Town Centre in Fingal was Malahide which does not accord with the indicative floorspace for district centres in the RPG.</li> <li>7. The guidelines states there is no clear size threshold for a district centre but are likely to compromise 20,000 sq m. Whether the 20,000 sq m threshold relates to net or gross floorspace is an issue which requires to be clarified with the DoEHLG.</li> <li>8. With the exception of Dalkey, the designation of the district centres within the Dun Laoghaire/Rathdown Development Plan will restrict any of these centres growing to anything more than their current form and profile. There is a need for re-evaluation of the approach if the attraction and competitiveness of the county is to be sustained and enhanced.</li> <li>9. The Fingal and Wicklow County Development Plans provide for new district and neighbourhood centres but do not specify specific sites or locations.</li> <li>10. Baldaggy and Clondalkin are designated as 'Level 3 District Centres' in the County Retail hierarchy, however Balgaddy has a 'Town Centre' zoning objective and Clondalkin is designated as a town centre within the county settlement hierarchy.</li> <li>11. Dublin City is not delivering to its potential which was accommodated for in the 2001 GDA Retail Strategy.</li> <li>12. There is scope for an increase in retail floorspace in Dun Laoghaire-Rathdown by 76,500 sqm in the short term and 277,500 sq m in the long term.</li> <li>13. The approach adopted in the GDA Retail Strategy Review incorporates household surveys and is welcomed as it will provide information on market share expenditure patterns</li> </ol>

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	<p>however this is not the case in respect of trade draw information (as the approach does not include face-face shopper surveys in the main centres) which is a key issue for the review:</p> <ul style="list-style-type: none"> <li>▪ Enable monitoring of the effects of changes in the retail landscape on the performance of these centres</li> <li>▪ Provide the basis to inform the capacity assessment of the requirement for additional retail floorspace.</li> </ul> <p>14. Ballymun Town Centre is in the heart of the northern arc of the city; an area which requires 97,274 sq m – 350,878 sq m of retail floorspace additional to that which is underway or anticipated to be forthcoming over the next 5-10 years.</p> <p>15. The size of the residential and growing working population in and around Ballymun provides strong justification for these needs to be met in a more efficient, equitable and sustainable manner.</p> <p>16. Unless a critical mass of retail floorspace is delivered, areas which have a stigma and are negatively perceived will not attract the wider potential of their catchment areas and this needs to be addressed if regeneration objectives are to be met.</p> <p>17. Need to significantly enhance the retail offer of Stillorgan in order to sustain and increase its competitiveness; to attract and retain occupiers and to harness the benefits of it being the interchange for the existing and proposed QBC.</p> <p>18. There is limited scope for new floorspace at Dundrum Town Centre due to land availability and road capacity issues and this needs to be addressed strategically.</p> <p>19. Need to highlight the interpretation in the County Development Plan of the indicative floorspace capacity set out in the 2001 GDA Retail Strategy: the County Development Plan takes this as a cap on additional retail floorspace whereas it was meant to be indicative and guidance; advised that development plans cover administrative areas whereas shopping centres are planned for catchment areas with the boundaries rarely coinciding.</p> <p>20. Comprehensive reappraisal of the role and potential of Stillorgan is required.</p>
<p><b>Treasury Holdings</b>  Relating to Lucan-Clondalkin</p>	<ol style="list-style-type: none"> <li>1. The retail provision in the Lucan-Clondalkin area is predominantly for convenience goods with a limited range of low to medium order comparison goods outlets.</li> <li>2. The estimate retail requirements for the future population including Adamstown, based on a target year of 2016, will be in the order of 12,000 sq m of net convenience floorspace and 96,000 sq m of net comparison floorspace. This level of retailing significantly exceeds the district centres in the Dublin context and implies a wide ranging and high quality provision can be supported.</li> <li>3. Based on the estimated expenditure levels forecast in the strategy and allowing for committed floorspace, it is estimated the future population can support a minimum of</li> </ol>

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	<p>6,000 sq m net of convenience floorspace in 2011 and increases to 8,000 sq m in 2016 and to 10,000 sq m if an allowance is made for development on land not currently zoned.</p> <ol style="list-style-type: none"> <li>4. Floorspace should ideally be distributed to serve existing and future populations not adequately served at present.</li> <li>5. Growth in disposable incomes has been greater than anticipated in the Retail Planning Strategy for the GDA.</li> <li>6. Future growth in population and expenditure in the Lucan-Clondalkin area will be substantial and more than adequate to support a major town centre at Balgaddy, whilst allowing for the further development of comparison retailing and retail warehouses elsewhere.</li> <li>7. There is a lack of a suitable town centre for the settlement, this provision is a priority which would give an integrated identity and will allow it to be competitive and an attractive and pleasant place to live.</li> <li>8. The Liffey Valley centre has never functioned as a town centre for the settlement and its potential to develop as the major town centre is very limited for various reasons.</li> <li>9. The quantum of floorspace required taken together with existing/proposed road and rail developments provide an opportunity for a major town centre at Balgaddy.</li> </ol>
<p><b>Treasury Holdings</b></p> <p>Regarding Fonthill, Clonburris, South Dublin</p>	<ol style="list-style-type: none"> <li>1. To designate Fonthill, Clonburris (formerly known as Balgaddy) as a major town centre in the retail hierarchy.</li> <li>2. Under the draft planning scheme it will have the facilities, services and functions of many major town centres.</li> <li>3. The Fonthill site has been zoned for town/district centre uses under the Dublin County and South Dublin County Development Plans since 1972.</li> <li>4. Fontwell will have a Metrowest station and two Quality Bus Corridors which will create a multi modal transport interchange at Fonthill.</li> <li>5. The development of a major town centre at Fonthill is in accordance with national, regional and local planning policy, which supports the integration of high intensity land uses at key transportation nodes.</li> <li>6. The Clonburris SDZ Planning Scheme 2007 provided a hierarchy of retail locations-primary retail zone at Fonthill, secondary retail zone at Kishoge Station and local retail distributed throughout the area.</li> <li>7. The proposed population of the immediate Fonthill area (65,000) is comparable to the current population of Swords (40,000) and Bray (32,000) which are both designated as major town centres.</li> <li>8. The Retail Strategy for the GDA has an 8yr time frame from 2008-2016 and it is therefore considered necessary that the strategy provides adequate retail floorspace for the County to 2016.</li> <li>9. The Liffey Valley Centre is the principal comparison groups outlet for Lucan-Clondalkin however it does not function as</li> </ol>

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	<p>a town centre for the settlement as a whole and its potential to develop as the major town centre is very limited for reasons including: its off-centre location; design and layout; impact to road networks and limited accessibility to public transport compared to Fonthill.</p> <p>10. The appropriateness of the major town centre at Liffey Valley should be reviewed</p> <p>11. The principle of a high density mixed use development on the lands in the ownership of Everglade Properties Ltd, including a substantial retail elements has been endorsed.</p>
<p><b>Treasury Holdings and Castlekeel Lts</b></p> <p>Regarding Collinstown, Leixlip, Kildare</p>	<p>1. Collinstown should be designated as the major town centre for north east Kildare in the new retail hierarchy to:</p> <ul style="list-style-type: none"> <li>▪ Address the current deficit in retail offer</li> <li>▪ Enhance the recreational/leisure facilities</li> <li>▪ Reduce the need to travel</li> <li>▪ Complement the existing and proposed retail development</li> <li>▪ Promote economic development.</li> </ul> <p>2. Collinstown is highly accessible by range of transport modes and centrally located,</p> <p>3. There is a significant deficit in high-end high order comparison shopping in north east Kildare resulting in the population travelling outside of the county</p> <p>4. An appropriate level of comparison retailing is not available in any of the existing town and village centres of Leixlip, Maynooth, Celbridge or Kilbrook thus representing a significant gap in the retail hierarchy</p> <p>5. The designated MTC at Collinstown is in accordance with Sustainable Development-A Strategy For Ireland, Retail Planning Guidelines, Regional Planning Guidelines for the GDA, the Retail Strategy for the GDA, Transport 21 and the Kildare County Council Development Plan 2005-2011.</p>
<p><b>Percy Nominees Ltd</b></p> <p>Regarding Nutgrove Shopping Centre</p>	<p>1. Nutgrove Shopping Centre is defined as a district centre however it would be appropriate to designate it as a town centre.</p> <p>2. Any further provision of retail floorspace on the site would reinforce the retail function of the district centre and improve the vitality and viability of the centre. The future expansion and intensification of use would be in accordance with the strategic guidance set out in the RPG and would aid the development of a more sustainable retail hierarchy for Dun Laoghaire/Rathdown.</p> <p>3. No guidance is given with regard to the appropriate level of floorspace that should be provided at Nutgrove Shopping Centre.</p> <p>4. It is an objective of the County Development Plan to recapture at least 50% of the lost comparison retail expenditure by way of attracting higher quality retail facilities. Despite phases 1 and 2 of the Dundrum Shopping Centre there is still significant scope for the provision of additional retail floorspace to address leakage.</p> <p>5. The strategy should recognise the need for Nutgrove to</p>

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	<p>maintain its competitiveness.</p> <p>6. Consideration needs to be given to achieving an appropriate balance of floor space allocation for town/district centres compared with major town centres to ensure that major town centres do not take up all the floorspace allocation.</p>
<p><b>Crossridge Investments/Lenridge Developments Ltd</b></p> <p>Regarding lands at Dundrum Town Centre</p>	<ol style="list-style-type: none"> <li>1. Difficulties will arise in future if additional floorspace is required once the Dundrum town centre scheme has been completed and it is therefore crucial to provide sufficient floorspace to allow for the ongoing development of Dundrum and possible changes in the floorspace requirements of existing and future retailers.</li> <li>2. While significant development has already occurred in Dundrum there are proposals for future phases and improvements to the area and is supported by the planning authority. Future stages will comprise a mix of uses including retail, commercial, residential and community facilities.</li> <li>3. Reaffirmation of the Dundrum's place in the hierarchy as a 'Major Town Centre', being second to Dublin.</li> <li>4. Recognition of the limited development land available in Dundrum and the resultant requirement for higher density developments in order to provide the appropriate floorspace.</li> <li>5. The strategy should recognise the scale and significant of MTCs and the timescales involved in their planning and development</li> <li>6. Opposes any floorspace restrictions which may undermine the implementation of large scale proposals.</li> </ol>
<p><b>P Thomas and G Sothorn</b></p> <p>Regarding lands at The Abbey, Emily Square, Athy, Kildare</p>	<ol style="list-style-type: none"> <li>1. Athys designation as a 'Level 3 Hinterland Area Sub-County Town Centre' should be retained.</li> <li>2. Strong and specific policies should be put in place to promote future retail developments in Athy</li> <li>3. The review of the strategy should recognise that there are suitably zoned town centre sites in Athy Town Centre for the location of modern format comparison and conveniences retail floorspace and should be favoured over out-of-town sites.</li> </ol>
<p><b>Bovale Developments</b></p> <p>Regarding lands at the Charlestown Centre, Finglas</p>	<ol style="list-style-type: none"> <li>1. Recognition of the Charlestown Centre as a Level 3 'Town and/or District Centre' with the capacity for expansion to 2016, particularly in the context of proposals for Metro West</li> <li>2. The capacity of the Charlestown Centre to provide upwards of 35, 000 sq m to serve the expanding residential community in Finglas North</li> <li>3. Policies and objectives of the GDA retail strategy should reflect the principle of additional capacity for retail warehousing/retail park facilities on lands adjoining the Charlestown Centre (circa 10,000-15,000 sq m) creating a high quality retail/commercial centre.</li> <li>4. Requests the authority refrains from imposing specific floorspace caps for particular centres where there is</li> </ol>

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	potential for conflict with long standing development plan policies.
<p><b>The Park Development Group</b></p> <p>Regarding The Park, Carrickmines</p>	<ol style="list-style-type: none"> <li>1. The Park, Carrickmines is developing as a key transportation node and has a strategic location which makes it a logical and sustainable location to provide a district centre facility to serve the surrounding residential neighbourhoods and should be designated as a district centre in the new GDA Retail Strategy.</li> <li>2. The retail provision comprises neighbourhood and local retail floorspace which is limited in view of the existing and emerging population. This is a key deficit in the county and should be addressed in order to reduce car dependency trips</li> </ol>
<p><b>Shannon Homes (Drogheda) Ltd</b></p> <p>Regarding Lands at Colpe Cross, Drogheda, Meath</p>	<ol style="list-style-type: none"> <li>1. The formal designation of lands at Colpe Close, Drogheda as a 'Major District Centre' for South Drogheda.</li> <li>2. The suitability of the land to accommodate a district centre is well established: <ul style="list-style-type: none"> <li>▪ A variation to the 2001 Meath County Development Plan was adopted and the site is identified as suitable for a 'small district centre';</li> <li>▪ Extant permission for retail, service, office, leisure and community uses;</li> <li>▪ Population increases;</li> <li>▪ Significant new and planned housing in the vicinity of the site;</li> <li>▪ Drogheda is identified as a primary growth centre by the National Spatial Strategy and the RPG</li> <li>▪ The designation conforms to national and regional planning policy as expressed through the RPG for the GDA and the Border Area as well as the Retail Planning Guidelines.</li> <li>▪ Will ensure that local retail and service needs of the new and expanding residential areas in the vicinity are met in an equitable, efficient and sustainable manner.</li> </ul> </li> <li>3. Although the submission lands are located within Meath's administrative area, they are 2.5km from the Drogheda Town Centre. The Drogheda Development Plan recognises the need to identify a suitable site for the provision of a district centre to serve the catchment of the southern environs.</li> </ol>
<p><b>Green Property Limited</b></p> <p>Regarding Blanchardstown Town Centre</p>	<ol style="list-style-type: none"> <li>1. The 2006 Census indicates that the population of Blanchardstown and its immediate environment is expected to reach 100,00 by 2011. However the Greater Blanchardstown Area (GBA) does not have the level of retail provision and associated services normally associated with major urban centres with a population of 100,000. It is therefore important that the Blanchardstown Town Centre (BTC) continues to expand and improve its retail offer.</li> <li>2. It is envisaged that the substantial land holding in the ownership of Green Property Limited, will accommodate the majority of new development proposed for the BTC up to</li> </ol>

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	<p>2011, including 50,00 sq m of net sales area retail floorspace.</p> <ol style="list-style-type: none"> <li>3. The Draft Blanchardstown Town Centre Framework Plan 2006-2011, prepared by Green Property Limited in association with Fingal County Council, places a strong emphasis on increasing employment provision within the BTC and in accordance with the objectives of the Development Plan and County Retail Strategy sets out a detailed strategy for the delivery of 50,000 sq m of additional retail floorspace. Significant areas of residual undeveloped lands have been retained to ensure that the BTC can accommodate for future expansion requirements.</li> <li>4. With the emerging preferred route for Metro West running through BTC linking Tallaght to the airport, it is anticipated that the BTC will become a major node within the west Dublin public transport network with the potential for interchange and will significantly improve public transport links between the BTC and its core catchment area within the GBA.</li> </ol>
<p><b>Bray Retailers Group</b></p>	<ol style="list-style-type: none"> <li>1. BRG would like the proposed Superquinn development capped at 22,000 sq ft and for convenience goods only</li> <li>2. E.U Directive 11 protects an area from unnecessary developments which add to pollution. The proposed Pizzaro development will add to significant vehicle movements.</li> <li>3. E.U Directive 25 seeks to retain, enhance and consolidate existing town centres as vital and viable entities sequentially and only when a demonstrable need exists may more retail space be considered for edge of town centres.</li> <li>4. Extrapolation can show (for Bray) the existing square footage and the future square footage requirements necessary to fulfil per capita spending patterns.</li> </ol>
<p><b>An Taisce – The National Trust for Ireland</b></p>	<ol style="list-style-type: none"> <li>1. Evaluation should be carried out to determine the effectiveness of existing policies in maintaining retail primacy of existing town centres</li> <li>2. Evaluation should be carried out to determine the impact of town fringe retail development on older, urban centres and towns in wider catchment area.</li> <li>3. Assessment should be sought on the degree to which car-based retail development is contributing to transport generated emissions, particularly for comparison shopping between retail parks.</li> <li>4. Measures should be provided to reduce car-based retailing and the contribution of car-based trips generated by retailing in the GDA. This should include <ul style="list-style-type: none"> <li>▪ Car parking charges on all out of town and urban fringe retailing</li> <li>▪ Specific provisions to discourage car trips for comparison shopping</li> <li>▪ Cross subsidy of public transport though car parking charges on all retail developments</li> </ul> </li> <li>5. With regards to guidelines for new/enhanced retail</li> </ol>

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	<p>development, specific consideration should be attached requiring public transport accessibility and a Mobility Strategy to reduce car dependence, emissions and congestion.</p>
<p><b>Dun Laoghaire Business Association</b></p>	<ol style="list-style-type: none"> <li>1. The shopping on South Dublin Seastrip has potential for retail and tourism developments and plans are at an advanced stage by the business association and the chamber to jointly promote the strip</li> <li>2. The retail potential of Dun Laoghaire could be greatly expanded by the development of the laneways at the back of Lower and Upper George Street and this development is allowed for in the DLR County Development Plan. The fragmented ownership of these properties demand some form of tax incentive to encourage development.</li> <li>3. A mixture of high quality retail, residential, coffee shop etc would have the potential of having a major impact on retail development in the region.</li> <li>4. The Old Fire Station is ideal for development as a single retail development and would have a major positive impact on retail development</li> <li>5. Major residential development on the Old Dun Laoghaire Gold Course has the potential to impact positively on Dun Laoghaire town.</li> <li>6. The up-market theme so successfully adopted by Glashule/Sandycove should be extended into Monkstown and along the shopping/tourist sea strip from Booterstown to Greystones.</li> <li>7. The existing shopfronts throughout Dun Laoghaire do not compliment the Victorian buildings and therefore an architectural plan is required for the shopfronts.</li> <li>8. Dun Laoghaire Business Association is currently organising a Business Improvement District scheme for Dun Laoghaire Town and Harbour.</li> </ol>
<p><b>National Roads Authority</b></p>	<ol style="list-style-type: none"> <li>1. NRA are aware of the impact of existing and new intensive retail developments within the region, which have the potential to adversely affect the national road infrastructure.</li> <li>2. The NRA wishes to emphasise the importance of ensuring that the objectives of the Retail Planning Guidelines 2005 are implemented, such that <i>“the optimum location for new retail development which is accessible to all sections of society and is of a scale which allows the continued prosperity of traditional town centres and existing retail centres. This can only be achieved if strategic retail policies and proposals are incorporated in the development plan system”</i> (para 21)</li> <li>3. Three of the five key objectives (paras 24-26) identified in the Guidelines concern issues of accessibility and location in the context of the continuing role of town/district centres and proximity to existing, new or planned national roads/motorways.</li> <li>4. The review should reflect and safeguard the strategic role of</li> </ol>

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	<p>the national road network in catering for the safe and efficient movement of major inter-urban and interregional traffic to allow effective delivery and service of the investment by ensuring these key sustainable principles are applied.</p> <ol style="list-style-type: none"> <li>5. The strategy should seek to avoid the undermining of the strategic function of national roads by measures intended to cater for the needs of local traffic and local development related traffic to be addressed at the earlier stages.</li> <li>6. The review should also be guided by Government policy which encourages greater integration of transportation and land use planning at the early stages by: <ul style="list-style-type: none"> <li>▪ Promoting more sustainable transport choices;</li> <li>▪ Promoting greater accessibility for all</li> <li>▪ Reducing the need for local travel, especially by private car</li> </ul> </li> </ol>
<p><b>DCBA</b> Letter dated 01/11/07</p> <p>Letter dated 11/01/08</p>	<ol style="list-style-type: none"> <li>1. Insufficient consultation period especially given the Christmas and New Year period is unhelpful and counter productive.</li> <li>2. An authoritative report is required and full engagement with stakeholders. The report should not lack credibility and be open to legal challenge.</li> </ol> <hr/> <ol style="list-style-type: none"> <li>1. DCBA had no confidence in the last review and there is no evidence available to demonstrate that the present review will be any different.</li> <li>2. The DoE claimed it would facilitate the entry of new retail operators in to the Irish Market and widen consumer choice which it clearly has not and the expansion of retail space has led to more of the same and a high mark up price.</li> <li>3. The dispersal is contrary to good transportation and land use planning and has created car based traffic congestion, undermined public transport and ensured that the City Council rates base growth has performed less than elsewhere.</li> <li>4. The NSS is in reality dead due to a dispersal policy at national and local level.</li> <li>5. No justification for new retail guidelines</li> <li>6. 2008 will be a difficult financial period for the US and possibly UK. Casualties in construction and retailing can be expected and in such an environment the DoE has a duty to be prudent and not to repeat mistakes.</li> </ol>
<p><b>Aldi Stores (Ireland) Limited</b></p>	<ol style="list-style-type: none"> <li>1. One of the key principles of the planning system is that it does inhibit competition, preserve existing commercial interest or prevent innovation. Whilst the RPG and the current Retail Planning Strategy for the GDA distinguish between different types/formats of convenience retailing (discount food store, supermarkets, hypermarkets, etc) some Local Authorities within the GDA treat discount food stores as a separate land use class in their Development Plans. As a result, the types of locations where discount food stores are permitted are more restricted than other</li> </ol>

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	<p>types of convenience shops, despite the fact that the same types of good but at lower prices. Discount food stores are therefore assessed as if they are a different use class and is inhibiting a competitive and healthy retail environment and is contrary to national retail policy guidance. Aldi seeks to ensure therefore, that the Retail Planning Strategy for the GDA treats discount food stores as a type/format of convenience retailing in accordance with the RPG and the inclusion of a statement within the Retail Planning Strategy Review to the effect that identifying discount food stores should be assessed in the same manner as other convenience retailers.</p> <ol style="list-style-type: none"> <li>2. The RPG distinguishes between types of retail goods, retail formats and types of centres where retailers locate. In providing guidance as to the most appropriate location for new retail proposals the RPG distinguishes between convenience and comparison goods but not between types of retailers by virtue of the fact that the tenant occupying a particular store is not a material planning consideration.</li> <li>3. There are inconsistencies in the Development Plans in the approach to assessing applications for discount food stores, in particular the Dun Laoghaire Rathdown, South Dublin and Fingal Plans the zones in which discount food stores are 'permitted' are fewer than where neighbourhood shops are permitted.</li> </ol>
<p><b>RGDATA (Retail, Grocers, Dairy and Allied Trade Association)</b></p>	<ol style="list-style-type: none"> <li>1. The reviewed strategy should be conceived with the overarching context of the objectives of the Planning and Development Act 2000. The scale and location of major retail shopping is the most significant land use determinant for the creation of sustainable travel patterns and this consideration should be paramount.</li> <li>2. The study should assess the performance of the Dublin Regional Authorities in discharging the objectives of the guidelines, particular regarding the health checks of the main centres. It does not appear that the Authorities are collecting this information, or if they are the information is not public.</li> <li>3. It is essential that credibility, clarity and certainty are provided in relation to the quantum of retail development necessary for the lifetime of the strategy and its geographical distribution.</li> <li>4. It is essential that the strategy is co-ordinated with the Plans of the various Authorities to ensure that there is a realistic and achievable balance between identifiable needs and appropriately zoned land.</li> <li>5. The study should consider the glossary provided in the Annexe of the RPG which provides a description of various types of centres and convenience and comparison groups. In the past number of years proposals have been made for inappropriately scaled centres in inappropriate locations.</li> <li>6. Greater emphasis to be given to sections 60 and 61 of the</li> </ol>

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	<p>RPG which require identified sites to be capable of development within a reasonable period of time and equally that the private sector should be adaptable and flexible in appraising potential sites.</p> <ol style="list-style-type: none"> <li>7. The need for local, neighbourhood or district centres to operate as genuine mixed use environments, rather than purely retail locations.</li> <li>8. The potential for the creation of urbanity and developments based on 24 hour public streets should be preferred to the privatised enclosed shopping malls.</li> <li>9. The suggestions for improving Town Centres as set out at paragraph 5.112 to 5.116 have in general not been pursued or achieved and should be reiterated and strengthened.</li> <li>10. Greater clarity should be achieved as to the appropriate location for discount food stores; some Authorities have varied Development Plans to permit their location in industrial areas, contrary to the RPG.</li> </ol>
<p><b>Conroy Crowe Kelly</b></p>	<ol style="list-style-type: none"> <li>1. The RPG provides objectives in order to protect the amenities of settlements, both existing and proposed, and it is in the latter case that the GDA retail guidelines need greater focus.</li> <li>2. The GDA Retail Planning Strategy 2002 outlined a 'GDA retail Hierarchy' and under 'Level 2 Major Town Centres' eight metropolitan centres were designated, however three of these 'town centres' are in fact shopping centres (Blanchardstown, Liffey Valley and Tallaght) and Dundrum is now synonymous with a shopping centre. Shopping centres are substandard 'town centres'; they are not accessible and open 24/7 and people do not feel ownership as they are not open or civic places. The designation of these shopping centres as 'town centres' allowed their expansion to the detriment of real town centres.</li> <li>3. Out-of-town shopping centres should not be allowed to be the basis for retail provisions for new populations and existing town centres should be strengthened and connections made and new real town centres to be created around civic spaces and attractive public realm.</li> <li>4. Future retail hierarchy should recognise the importance of existing real town centres and outline how future retail provision can be accommodated in newly created town centres.</li> <li>5. Retail provision should be firmly linked to transportation and located in areas which are easily accessible for walking, cycling and public transport. Therefore they should be located in town centres.</li> <li>6. Town centres are still the most suitable and sustainable locations for future retail development within the GDA, edge-of-centre retailing is not in the best interest for the future viability and vitality of existing town centres.</li> <li>7. The new towns as proposed by the Local Area Plans and SDZ Planning Schemes should be supported and adequate</li> </ol>

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	<p>retail should be allowed at these locations to ensure viability. The strategy should ensure that any future planned areas are not reliant on mono-use shopping centres but rather a town centre where retail provision along with community uses, public streets and squares.</p> <ol style="list-style-type: none"> <li>8. Neighbourhood centres should be strengthened and protected.</li> <li>9. District centres should be incorporated into all large residential schemes as a fully integrated part of the street pattern and used to reinforce local identity.</li> <li>10. Encourage Local Authorities to incorporate the identified retail requirements into multi-functional mixed use areas expressed by Local Area Plans</li> <li>11. The UK Competition Commission provisional findings report 'Market Investigation into the Supply of Groceries in the UK' recommends for competition purposes that planning authorities should be amenable to retail developments at edge-of-town sites (but not-out-of-town), this presumption argues that town centres should be prioritised and a presumption against edge-of-centres is still required.</li> <li>12. Public uses such as retail and services should be provided along the street edge.</li> <li>13. Avoid shopping conglomerations under single management that may encourage the proliferation of restrictive or exclusive practices.</li> </ol>
<p><b>Tesco Ireland Ltd</b></p>	<ol style="list-style-type: none"> <li>1. There is an under provision of retail floorspace within the GDA and this needs to be addressed through detailed analysis of settlements/urban areas, including road infrastructure, site availability, service infrastructure and appropriate zoning designation which will ensure deliverability</li> <li>2. Certain centres are over trading whilst others centres are experiencing leakage and can be addressed by promoting competition, providing adequate and available land and upgrading/provision of local roads.</li> <li>3. There is a need for proactive policies to encourage Local Authorities to address the issue of land availability and to insure in the instances where land is not available that retail development is not restricted by a too rigid application of the sequential test.</li> <li>4. Policies should be included to encourage local road infrastructure to provide for town centre expansion areas and lands with appropriate retail designations</li> <li>5. There is a need for an increased amount of appropriate retail designation in the hinterland and metropolitan area.</li> <li>6. Local Authorities should incorporate more flexible zonings and matrices into their Development Plans</li> <li>7. Encourage policies which ensure land availability to promote greater competition</li> <li>8. Floorspace caps should not be incorporated but indicative floorspace figures provided instead</li> </ol>

## Appendix 2: Summary of Pre-Draft Submissions

	<p>9. Dynamic clusters of settlements would allow a number of settlements in close proximity to be viewed as one but also allow for one of those settlements to develop a greater retail offer.</p>
<b>NorDubCo</b>	<ol style="list-style-type: none"> <li>1. The primary concern is the perceived lack of co-ordination between local authorities in the granting of planning permission for retail development.</li> <li>2. Finglas is a prime urban centre in the Dublin City hierarchy, with retail floorspace spread across Finglas in the village, Clearwater, and Aldi and Lidl on the North Road, all in Dublin City area. Charlestown is located in Fingal County Council, and is designated as a District Centre a short distance from Finglas village and will have greatest impact on Finglas in diverting retail from the village area. Relevant Local Authorities should undertake joint impact studies to ensure that developments which place District Centres within close proximity are properly examined.</li> </ol>
<b>Supervalu, Churchtown</b>	<ol style="list-style-type: none"> <li>1. It is a flaw of some retail studies, in establishing baseline floorspace information, that they take account of larger shopping and town centres and ignore neighbourhood and local stores. This approach can lead to a significant underestimate of baseline floorspace and lead to a projection of excessive demand for additional space with negative consequences for established outlets.</li> <li>2. Trusts that policies relating to the location of district and neighbourhood level convenience retail floorspace will take account of the fact that the propensity for growth in some areas is limited.</li> <li>3. Requests the review takes a more holistic view of the convenience sector, to include the more specialised stores-delicatessens, bakes, butchers etc.</li> </ol>
<b>Dublin Transportation Office</b>	<ol style="list-style-type: none"> <li>1. It is essential that the Retail Planning Strategy reflects the important role that public transport will play in shaping the future development of the GDA in terms of the location and scale of retail development, the definition of retail catchments and the manner they relate to the hierarchy of centres.</li> <li>2. The RPS must provide guidance on the appropriate form of access to retail facilities at different levels and on reducing reliance on the private car.</li> <li>3. Level of parking is crucial and should be address in the RPS</li> <li>4. If travel times are used in defining retail catchments for higher order centres then these should be based in the first instance on the presumption of public transport usage rather than the private car.</li> <li>5. The current RPS does not provide guidance on the determination of target populations for centres at different levels in the hierarchy in order to enable population catchments to be determined.</li> </ol>

## Appendix 2: Summary of Pre-Draft Submissions

	<ol style="list-style-type: none"> <li>6. There is a need to establish a clear correlation between the retail hierarchy identified in a RPS and settlement hierarchy as established through the RPG.</li> <li>7. Appropriate catchment population sizes and accessibility criteria across all modes of transport for retail centres at all levels should be defined.</li> <li>8. Public transport accessibility, walking and cycling should be given priority in determining suitable location, scale and function of retail facilities.</li> <li>9. If the category 'major town centres' in the retail hierarchy is to be retained the criteria relating to its definition and retailing at all other levels needs to be clarified.</li> <li>10. The role of the city centre for higher-order comparison goods and niche shopping should be maintained and protected.</li> <li>11. There is a need to determine an amount of convenience good shopping to primarily serve the expanding local city centre population.</li> <li>12. Retail development within the GDA should not be placed for on the basis of competitive advantage of one administrative area over another, but in the region as a whole.</li> <li>13. The RPS needs to reflect the principles of town centre development contained in the guidelines and not to present itself as a purely market-driven strategy.</li> </ol>
<p><b>Balbriggan &amp; District Chamber of Commerce</b></p>	<ol style="list-style-type: none"> <li>1. Whilst the Chamber supports the retail and commercial development of the town, they are conscious of the existing retail community and the possibility of an Old Town/New Town retail division.</li> <li>2. The preservation of the central retail district within the town should be a priority and existing retailers should be given an opportunity to integrate with the new development.</li> <li>3. Future retail development should consider substantial improvement in parking spaces</li> <li>4. An improvement in the transport infrastructure at Balbriggan would be required before any substantial retail development is undertaken</li> </ol>
<p><b>Mr Graham Quinn</b></p>	<ol style="list-style-type: none"> <li>1. The recent and continued growth in the population of Rush should be matched by the necessary provision of retail facilities. Failure to provide necessary retail services will lead to continued leakage.</li> <li>2. The current retail offer in Rush is recognised as poor-there are no supermarkets or higher order comparison retail outlets.</li> <li>3. Rush suffers from retail leakage which results in an increase in car dependency</li> <li>4. Local planning policies recognise the suitability of Rush for the development of a neighbourhood centre, which would complement the town centre, protect the established urban context and to cater for the increasing residential population, and this should be reflected in regional retail planning policy.</li> </ol>

## Appendix 2: Summary of Pre-Draft Submissions

	<ol style="list-style-type: none"><li>5. The land in ownership is situated in the North-West quadrant of Rush and it is envisaged that this is the area where the continued development of the town will occur.</li><li>6. The strategy should identify an appropriate site outside Rush Town Centre suitable for the development of a neighbourhood centre.</li><li>7. It is presumed that Rush is within the fourth tier of the hierarchy provided in the RPG however its population (8,286 persons) is in excess of the population category (1,500-5,000) defined for towns in the fourth tier. The identification of Rush as a 'Moderate Growth Town', in accordance with the RPG, will facilitate the enhanced provision of modern retailing facilities, will help Rush to develop to its full potential and address leakage.</li></ol>
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## Post Draft

### Retail Submissions on Draft Retail Strategy

	<i>Subject</i> →		
	<b>Party</b> ↓	<b>Date</b>	<b>Topic</b>
01	<b>National Roads Authority</b>	June 4 <sup>th</sup>	<ul style="list-style-type: none"> <li>• Add in Section in Paragraph 6.29 to suggest that a Strategic Transport Assessment be carried out during the preparation of development and local area plans.</li> <li>• Add a reference (in the Retail Development Management section) on the requirements for transport assessment in the Retail Planning Guidelines, paras 63, 65 and 84.</li> <li>• Rewrite 4.45-4.48 and “Policy Approaches to Differing Retail Formats” Pg 96 to reflect paras 84, 87 and 88 of the Retail Planning Guidelines.</li> <li>• Refer to Paragraph 26 of the Retail Planning Guidelines.</li> <li>• To acknowledge motor service areas as distinct from petrol stations.</li> </ul>
02	<b>Greystones Town Council</b>	June 5 <sup>th</sup>	Greystones designated as a Level 2 not a Level 3.
03	<b>McGill Planning</b>	June 6 <sup>th</sup>	On behalf of - Brunello Developments (Sandyford Central) <ul style="list-style-type: none"> <li>• Sandyford should be designated as a District Centre within the Retail Hierarchy.</li> <li>• Retail Caps not appropriate and should instead be market led.</li> <li>• The Strategy should give robust guidance on the types of retail use that should operate in Retail Warehouse Parks.</li> <li>• REVISE FLOORSPACE FIGURES for existing/planned as they appear inaccurate.</li> </ul>
04	<b>Roger Tym and Partners</b>	June 6 <sup>th</sup>	Re. Northside Town Centre – should be a Level 2, Explanation/Justification for Hierarchy needed – suggested that the hierarchy should be judged against three transparent criteria, size of centre (existing and as planned), role and function of the centre (existing and as planned) and the extent of the catchment area.
05	<b>Reid Associates</b>	June 9 <sup>th</sup>	On behalf of Dunloe Ewart, landowner in Cherrywood. <ul style="list-style-type: none"> <li>• Cherrywood should be a Level 2 centre.</li> <li>• There should be 3 major centres in DLR, Dun Laoghaire, Dundrum and Cherrywood.</li> </ul>
06	<b>Declan Brassil &amp; Company</b>	June 10 <sup>th</sup>	On behalf of - Keating Family, Clonee, County Meath  Re. Dunboyne Amend to Dunboyne-Clonee-Pace to fit in with the Meath County Development Plan.
07	<b>Declan Brassil &amp; Company</b>	June 10 <sup>th</sup>	Re. Dunboyne Amend to Dunboyne-Clonee-Pace to fit in with the Meath County Development Plan.

	<b>Subject →</b>		
	<b>Party</b>	<b>Date</b>	<b>Topic</b>
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<b>08</b>	<b>Tanaiste/Office of Enterprise, Trade and Employment</b>	June 12 <sup>th</sup>	Re. Taking cognisance of the Consumer Strategy Group Report.
<b>09</b>	<b>Health and Safety Authority</b>	June 12 <sup>th</sup>	General content required in any Planning Guidelines
<b>10</b>	<b>Mc Gill Planning</b>	June 13 <sup>th</sup>	On behalf of Gilmer Properties <ul style="list-style-type: none"> <li>• Expansion of retail at Glenageary</li> <li>• More guidance on Retail Warehouse Parks.</li> <li>• Agrees with qualitative approach</li> <li>• Concern of the figures for existing retail and planned retail</li> </ul>
<b>11</b>	<b>Tom Phillips and Associates</b>	June 13 <sup>th</sup>	On behalf of Palladio Properties <ul style="list-style-type: none"> <li>• Amend the Policy for Kildare in section 6.33</li> <li>• Amend existing convenience floorspace for Kildare Town.</li> </ul>
<b>12</b>	<b>Muir Associates</b>	June 13 <sup>th</sup>	On behalf of Dunloe Ewart to be read in tandem with the submission of Reid Associates received on June 9 <sup>th</sup> <ul style="list-style-type: none"> <li>• Cherrywood is a hole in the urban structure in DLR and here a sub-regional requirement needs to be met. Should be a Major Town Centre.</li> </ul>
<b>13</b>	<b>Mc Gill Planning</b>	June 16 <sup>th</sup>	On behalf of Pizarro Developments re. Industrial Yarns and Bray Golf Club sites, Bray. <ul style="list-style-type: none"> <li>• Suggested objectives for DLR and Wicklow</li> <li>• Discussion re. Pizarro Application in Bray</li> <li>• More robust guidance on Retail Warehouse Parks</li> <li>• Agree with qualitative approach</li> <li>• Concern over existing/planned floorspace.</li> </ul>
<b>14</b>	<b>Mc Gill Planning</b>	June 16 <sup>th</sup>	On behalf of Fleming Developments aka John J Fleming Construction Re. Aldi and Allegro Sites at Sandyford and lands at Glencairn. <ul style="list-style-type: none"> <li>• Sandyford as a District Centre</li> <li>• More robust guidance on Retail Warehouse Parks</li> <li>• Agree with qualitative approach</li> <li>• Concern over existing/planned floorspace.</li> </ul>

	<b>Subject →</b>		
	<b>Party</b> ↓	<b>Date</b>	<b>Topic</b>
15	<b>Mc Gill Planning</b>	June 16 <sup>th</sup>	On behalf of Blackrock Shopping Centre <ul style="list-style-type: none"> <li>• DLR should lift the cap at Blackrock and encourage the redevelopment of this District Centre</li> <li>• More robust guidance on Retail Warehouse Parks</li> <li>• Agree with qualitative approach</li> <li>• Concern over existing/planned floorspace.</li> </ul>
16	<b>Declan Brassil and Company</b>	17 <sup>th</sup> June	On behalf of the Byrne Family <ul style="list-style-type: none"> <li>• Should identify Metropark (lands near Ballymun interchange) as an emerging Level 3 Centre.</li> </ul>
17	<b>Auveen Byrne and Associates</b>	17 <sup>th</sup> June	On behalf of Jim Treacy, Supervalu, Churchtown <ul style="list-style-type: none"> <li>• Concern over forecasted floorspace requirements especially in DLR, it is submitted that these could lead to over provision. Suggests that any large scale extensions to existing centres should be justifiable only in exceptional circumstances.</li> <li>• Concern over the 20% figure for post 2016 building</li> <li>• Concern over the 20% figure for retail services</li> </ul>
18	<b>Mc Gill Planning</b>	17 <sup>th</sup> June	On behalf of Carrickmines Partnership re. lands at Kilternan zoned NC. <ul style="list-style-type: none"> <li>• Retail strategy should continue to promote the importance of local shopping and enhancing the viability of NCs</li> <li>• Agree with qualitative approach</li> </ul>
19	<b>Simon Clear and Associates</b>	17 <sup>th</sup> June	On behalf of Barkhill Limited re. lands at Liffey Valley <ul style="list-style-type: none"> <li>• Acknowledge the provision in the Liffey Valley LAP for 6,500sq.m net convenience.</li> </ul>
20	<b>Wicklow Town Council</b>	17 <sup>th</sup> June	<ul style="list-style-type: none"> <li>• The strategy should highlight specific issues/concerns for each town re. considerations of any out of town/edge of town retail applications.</li> <li>• Wicklow Town Development Plan should be incorporated in the strategy.</li> <li>• Draft strategy provides specific guidelines for the applicant to follow when carrying out a Sequential Approach for a RIA, also provide guidelines to the PA for assessing same.</li> <li>• Give more guidance on how Town Centre's can be rejuvenated at Dev Plan and Dev Management stage.</li> </ul>
21	<b>Tom Phillips and Associates</b>	17 <sup>th</sup> June	On behalf of Davitt Road Developments re. Lyons Tea and Unilever sites. <ul style="list-style-type: none"> <li>• Para 6.18 should be amended to 20,000sq.m net NOT gross.</li> <li>• District Centre could be provided on subject lands (Drimnagh)</li> </ul>

	<b>Subject →</b>		
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<b>22</b>	<b>Irish Hardware and Building Materials Association</b>	18 <sup>th</sup> June	<ul style="list-style-type: none"> <li>Consider that a retail warehouse strategy for each region and sub region should be in place.</li> <li>That the 6,000 sq.m threshold re. warehousing should apply in all cases (reference to section 83)</li> </ul>
<b>23</b>	<b>Simon Clear and Associates</b>	18 <sup>th</sup> June	<p>On behalf of Bymac Project Managers Ltd</p> <ul style="list-style-type: none"> <li>The redevelopment potential of Nutgrove District Centre should be identified under Section 4.39 of the Retail Strategy,</li> <li>That c. an additional 25,000m<sup>2</sup> is allocated to the Nutgrove Centre.</li> <li>Specific Policies for the future development of Nutgrove District Centre are included.</li> </ul>
<b>24</b>	<b>Tiros Resources Limited</b>	18 <sup>th</sup> June	<p>On behalf of Zapi Properties</p> <ul style="list-style-type: none"> <li>The strategy misinterprets The Retail Planning Guidelines re. gross retail area and net retail sales area. Nb. <b>Page 91</b> (refers to gross when it should be net retail sales area)</li> <li>Table 6.2 states that in the case of District Centres, retail activity is convenience and lower order comparison, this is considered to be overly restrictive. As Table E1 includes Town Centres, District Centres and Sub-County Town Centres, it shouldn't be suggested that middle order comparison is appropriate at Sub-County Town Centres, but not District Centres.</li> <li>That the strategy should explore the scenario that where the traditional shopping centre format would be detrimental to the environment of a village or town, that other locations may be more desirable.</li> </ul>
<b>25</b>	<b>GVA Planning and Regeneration Ltd.</b>	18 <sup>th</sup> June	<p>On behalf of Tesco Ireland Ltd.</p> <ul style="list-style-type: none"> <li>That the quantitative analysis appears to have some inaccuracies which have impacted on the calculation of retail need.</li> <li>Concern over the identified trade patterns within jurisdictions. The strategy has not recognised that there is an increased need for convenience in Dublin city centre and the suburbs. Eg the Docklands.</li> <li>Suggests that Neighbourhood/Local Centres and villages should be monitored by the LA and that where appropriate redesignation should be encouraged to facilitate future viability.</li> <li>The excessive use of the sequential test may unnecessarily impact on the deliverability of retail facilities.</li> <li>Recommendations re. conditions attached re. range of goods, floorspace and mezzanines is</li> </ul>

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	<b>Party</b> ↓	<b>Date</b>	<b>Topic</b>
			unnecessary and pp would be required for any material alterations regardless.
<b>26</b>	<b>Tiros Resources Limited</b>		<b>Para 6.57</b> Concern that RIA becomes too focussed on numbers. Considers that this is not appropriate and is contrary to the code of the Retail Planning Guidelines. Suggests a Forum to discuss an agreeable methodology.
<b>27</b>	<b>RPS Planning and Environment</b>	18 <sup>th</sup> June	<p>On behalf of the Mountbrook Group re. in particular Ballsbridge, Greystones, Donnybrook and Kilcock areas.</p> <ul style="list-style-type: none"> <li>• Suggests that the 2008 strategy has not taken account of each PA's adopted retail hierarchies since the 2001 Retail Strategy was published.</li> <li>• Whilst specific Level 3 Centres are listed in <b>Table 6.1</b>, it doesn't include all those currently designated by the planning authorities.</li> <li>• The strategy needs to reflect more accurately the policy led strategy as adopted by planning authorities and their existing strategies.</li> <li>• Particularly, Category A district centres in the DCDP should be included as Level 3 centres in the strategy.</li> <li>• Gross floorspace should be referred to as gross retail.</li> <li>• The per capita floorspace ratios included are unhelpful and should be omitted.</li> <li>• The figure in relation to District Centres should be net sales not gross.</li> <li>• Suggests that <b>Table 6.2</b> includes low order comparison goods as the type of goods suitable for sale at neighbourhood centres/small town centres.</li> <li>• There is a lack of qualitative information on the surveys conducted.</li> <li>• It is not clear what the sources for certain figures are.</li> </ul>
<b>28</b>	<b>RPS Planning and Environment</b>	18 <sup>th</sup> June	<p>On behalf of Mecca International re. 2.65 in Newtown (DLR)</p> <ul style="list-style-type: none"> <li>• A rigorous cross check of statistical exercises is needed. It is not clear what the source is for certain figures.</li> <li>• The strategy should be clear and prescriptive on the retail role of Blackrock now and in the future.</li> <li>• The cap of 25,000 sq.m on Blackrock in the DLRDP does not recognise its importance in terms of retailing and the surrounding catchment.</li> <li>• The strategy should include more detailed guidance to DLR.</li> <li>• Las should undertake a performance assessment of each centre in its functional area.</li> <li>• There is a lack of qualitative information on the surveys conducted.</li> <li>• Commentary on trends since 2001 and in what direction inflows and outflows is going should be included.</li> <li>• It is not clear what the sources for certain figures are.</li> <li>• Statistical information and calculations included in the appendices should be re-examined.</li> </ul>

	<b>Subject</b> →		
	<b>Party</b> ↓	<b>Date</b>	<b>Topic</b>
29	<b>Brian Meehan and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Treacy Courtyard Developments re. lands at Newbridge Town Centre c.16 acres</p> <ul style="list-style-type: none"> <li>• That the strategy includes strong policies aimed at reducing leakage from/through Kildare into the DMA and that Newbridge is promoted in this respect.</li> <li>• That the floorspace requirements for Kildare are increased c 40-50%.</li> </ul>
30	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Aldi Stores (Ireland) Ltd.</p> <ul style="list-style-type: none"> <li>• Concern over the definition of discount store in <b>Section 6.30</b> – they should also be located in NCs inline with the retail planning guidelines.</li> <li>• Increase the average size of discount foodstores from 1,500sq.m gross to 1,700sq.m gross.</li> <li>• Recommended that the definition of Discount Foodstores is as follows: <i>This form of retailing forms an important part of the convenience market and should be located in highly accessible locations such as town centres, district centres or neighbourhood centres (with a suitable provision of public facility fittings to be found therein). The key retail tests, such as justifying need impact, sequential test and ensuring that the development is of an appropriate scale, should be demonstrated as part of any discount convenience store application (exceeding 1,700 sq.m gross) where the site is not located in a designated local, neighbourhood, district or town centre.”</i></li> <li>• Amend the forecast 12,000euro sales density per square metre to 8,000euro for discount foodstores.</li> </ul>
31	<b>Stephen Ward Town Planning &amp; Dev. Consultants</b>	June 18 <sup>th</sup>	<p>On behalf of Shannon Homes (Drogheda)</p> <ul style="list-style-type: none"> <li>• Seeks the designation of lands at Colpe Cross Drogheda as a Level 3 District Centre within the GDA Hierarchy.</li> <li>• Suggests that <b>Table 6.1</b> is not consistent with the Meath County Retail Strategy 2003 or the emerging Drogheda Environs Local Area Plan.</li> <li>• Designation of this site as a Level 3 centre would be in line with <b>para 6.19</b> of the strategy, which underlines the importance of providing adequate retail facilities in expanding residential areas. It would also be in compliance with <b>para 3.5</b>.</li> </ul>
32	<b>John Spain Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Treasury Holdings and Castlekeel Ltd. Re. Collinstown, Leixlip, Co.Kildare.</p> <ul style="list-style-type: none"> <li>• The reference to 5-20 year period in removed in relation to Collinstown</li> <li>• That the strategy underestimates the capacity for additional floorspace,</li> <li>• The figures for turnover per sq.m of existing and future comparison is overestimated</li> <li>• There is discrepancy between the average per capita expenditure on comparison between Dublin and Kildare.</li> <li>• The strategy has not fully adjusted the market share assumptions to reflect its objectives.</li> </ul>

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			<ul style="list-style-type: none"> <li>The description of Major Town Centre should be amended to refer to 65,000sq,m net rather than 40,000sq,m as currently stated.</li> </ul>
<b>33</b>	<b>John Spain Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Treasury Holdings</p> <ul style="list-style-type: none"> <li>Make reference to floorspace figures consistent (net not gross)</li> <li>Capacity for future floorspace has been significantly underestimated.</li> <li>Differentiate between town and district centre – have regard to the restrictive definition of a district centre contained in the Retail Planning Guidelines.</li> <li>Should be specific reference to the Docklands area and it's potential – add a paragraph to Section 6 page 99.</li> <li>Concern over a number of inputs, assumptions and methodologies used. Suggests that the capacity for future retail floorspace in the GDA is underestimated.</li> <li>Concern over data on expenditure – questions the differentiation between the 28 sub regions and the overall reliability of data.</li> <li>Future floor space requirements do not fit in with the implementation of the strategy.</li> <li>Sales densities need to be revised downwards. The projected assessment of need for comparison needs to be revised upwards.</li> <li>The application of UK figures re. Internet shopping is inappropriate.</li> </ul>
<b>34</b>	<b>Wicklow Chamber of Commerce</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>LAs should be adequately resourced to carry out town centre health checks, to analyse existing spaces and identify opportunities for site assembly.</li> <li>Wicklow, Bray and Arklow town council have not been consulted.</li> </ul>
<b>35</b>	<b>Declan Brassil and Company</b>	June 18 <sup>th</sup>	<p>On behalf of McGarrell Reilly Homes Ltd</p> <ul style="list-style-type: none"> <li>Support of the designation of Dunboyne as a future Level 2 centre and notes that an increase in floorspace is needed for its Level 3 status in the medium term.</li> </ul>
<b>36</b>	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Treasury Holdings re. Clonburris</p> <ul style="list-style-type: none"> <li>Requests that Clonburris is recognised as a Major Town Centre to serve Lucan and Clondalkin.</li> <li></li> </ul>
<b>37</b>	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Percy Nominees Ltd re. Nutgrove Shopping Centre, Rathfarnham.</p> <ul style="list-style-type: none"> <li><b>Section 6.11</b> re. Level 3's welcomed, however, submitted that Appendix 7b Table 12 is omitted from the strategy as it is unnecessarily detailed re. floorspace.</li> </ul>
<b>38</b>	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Greencore re. lands at Woodstock South edge of Athy Town Centre</p> <ul style="list-style-type: none"> <li>Highlights Draft Athy Retail Study (Jan 2008) – suggests input into Section 6.33 re. Athy, to include reference to the development of a neighbourhood/district centre to the east and west of the town.</li> <li>Submitted that re. <b>Section 6.25</b> supermarkets of up to 3,500sq,m should be allowed.</li> <li>The retail strategy should support large NCs in edge of town locations due to the difficulty in</li> </ul>

	<b>Subject →</b>		
	<b>Party</b> ↓	<b>Date</b>	<b>Topic</b>
			<p>providing such formats in the town centre designated lands.</p> <ul style="list-style-type: none"> <li>• An amount of comparison floorspace is an accepted element of large anchor units.</li> <li>• A more modest figure of €8,000 to €10,000 should be used for convenience turnover per square metre.</li> </ul>
<b>39</b>	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Origin Enterprises re. lands at Newhall, Naas, Co, Kildare</p> <ul style="list-style-type: none"> <li>• Concern over the methodology and assumptions used re. future floorspace need – underestimates the capacity for additional retail floorspace in the GDA and particularly Kildare.</li> <li>• Figures used for turnover per square metre of existing and future comparison floorspace is overestimated.</li> <li>• There is discrepancy between the average per capita expenditure on comparison goods between Dublin and Kildare.</li> <li>• The strategy has projected existing shopping patterns into the future rather than adequately forecasting what patterns will be in light of the revised retail hierarchy,</li> <li>• The assessment of future floorspace need has underestimated the amount needed in Kildare to satisfy demand.</li> <li>• Retail warehousing needs greater acknowledgement</li> </ul>
<b>40</b>	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Bennett Developments and Kilsaran Ltd. re. lands at Portan, Clonee, Co. Meath.</p> <ul style="list-style-type: none"> <li>• In the interests of consistency, the strategy reflects the settlement strategy of the RPGs and Meath County DP by recognising the unique relationship between Dunboyne and Clonee.</li> <li>• Considered that Clonee can deliver a significant amount of floorspace allocated to Dunboyne.</li> <li>• Clonee should carry the same 'caveat' to allow for the evolution from Level 3 to Level 2 thus amending the reference from Dunboyne to Dunboyne/Clonee/Pace.</li> </ul>
<b>41</b>	<b>John Spain and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Green Property Limited owners of Blanchardstown Town Centre.</p> <ul style="list-style-type: none"> <li>• Blanchardstown Town Centre – Development Framework/Masterplan should be referred to.</li> <li>• Additional floorspace should be allocated to Blanchardstown Town Centre to permit the natural expansion over time.</li> </ul>
<b>42</b>	<b>RPS Planning and Environment</b>	June 18 <sup>th</sup>	<p>On behalf of The Square, Tallaght.</p> <ul style="list-style-type: none"> <li>• Rigorous assessment of statistical exercises required.</li> <li>• Strategy should be clear and prescriptive as to the retail role Level 2 centres play.</li> <li>• Strategy should set out clear direction on the allocation of floorspace ranges for these centres.</li> <li>• The final strategy should report clearly on the imperative to deliver a significant expansion of higher order comparison floorspace.</li> <li>• Clarify terminology re. Gross Lettable.</li> <li>• Per capita floorspace ratios are unhelpful and should be omitted from the final version.</li> </ul>

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			<ul style="list-style-type: none"> <li>• More detailed analysis of the survey results is provided.</li> <li>• Commentary on trends since 2001 or what directions inflows and outflows should be going is absent.</li> <li>• Statistical sources re-examined.</li> </ul>
<b>43</b>	<b>Cllr Derek Mitchell</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• Greystones should be Level 2 – higher order comparison merited but not applicable to Level 2 Centres, Residents of Greystones traditionally travel north and not south (to Wicklow)</li> </ul>
<b>44</b>	<b>Ballymun Regeneration Ltd.</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• Ballymun must be identified as a Level 3 Centre in the retail hierarchy (Table E1)</li> </ul>
<b>45</b>	<b>DTZ</b>	June 18 <sup>th</sup>	<p>On behalf of Treasury Holdings.</p> <ul style="list-style-type: none"> <li>• Clarity needed re. definitions applied to Level 3 centres.</li> <li>• Clarity on the likely size of a District Centre in the GDA.</li> <li>• Specifically acknowledge the importance of Ballymun.</li> <li>• Specifically acknowledge the importance of Stillorgan.</li> <li>• Re. catchment areas extending outside LA boundaries, strategy must reinforce principles in the RPGs and 2001 GDA Retail Strategy</li> <li>• Query re. per capita data</li> <li>• Potential for additional comparison floorspace reduced figure used for average turnover.</li> <li>• Potential inflows to GDA underestimating.</li> <li>• The use of a UK figure for internet shopping is inappropriate.</li> <li>• Number of issues raised re. household and shopper surveys and how they informed study outputs.</li> <li>• Distribution of floorspace has not been aligned with adopted plans.</li> <li>• Projected floorspace figures as gross is not conventional.</li> <li>• Is the allowance for services floorspace necessary?</li> <li>•</li> </ul>
<b>46</b>	<b>Meath County Council and Navan Town Council</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• Strategy requires an appropriate framework to redress leakage out of the county.</li> <li>• Provide clear policy objectives re. Navan's potential as a key retailing destination.</li> <li>• Ashbourne should be considered as a Level 2 Centre.</li> <li>• Bettystown should be included with Laytown's Level 3 designation.</li> <li>• Enfield should be included as a Level 3 centre,</li> </ul>
<b>47</b>	<b>Brian Meehan and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Crossridge Investments/Lenridge Developments re. lands at Dundrum Town Centre</p> <ul style="list-style-type: none"> <li>• The strong retail role of Dundrum Town Centre should be acknowledged and promoted in the DLR Policy Section (<b>Section 6.33</b>)</li> <li>• The strategy should recognize the forthcoming phase 2 development at Dundrum.</li> <li>• Omit reference to Dundrum in <b>Section 4.10 bullet points</b>.</li> </ul>
<b>48</b>	<b>Kildare County Council</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• Concern in relation to the manner in which the quantum of retail allocation can be distributed in a sustainable manner throughout the County.</li> <li>• Amend the strategy so that Las gave greater flexibility in relation to the distribution of comparison and</li> </ul>

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			<p>convenience retail floorspace within the LAs functional area.</p> <ul style="list-style-type: none"> <li>• Appendices should have a note referring to County (City) Retail Strategies, as the primary reference documents in relation to the distribution of retail need.</li> <li>• <b>Table 5.10</b> should refer to 25% in line with para 5.41.</li> </ul>
<b>49</b>	<b>Mc Gill Planning</b>	June 18 <sup>th</sup>	<p>On behalf of Stanley Holdings re. lands at Belmayne/North Fringe</p> <ul style="list-style-type: none"> <li>• North Fringe/Belmayne should be a Level 3, developing into a Level 2 over the next 10 years.</li> <li>• More robust guidance on Retail Warehouse Parks</li> <li>• Agree with qualitative approach</li> </ul>
<b>50</b>	<b>Tom Phillips and Associates</b>	June 18 <sup>th</sup>	<p>On behalf of Storeford Limited re. lands at Greenhills Road, Walkinstown</p> <ul style="list-style-type: none"> <li>• The strategy should be amended to reflect the under provision of retail facilities in the wider Walkinstown Area.</li> <li>• The potential of the subject lands to provide a significant quantum of retail floorspace should be recognised.</li> </ul>
<b>51</b>	<b>Tom Phillips and Associates</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• The methodology employed contains a number of baseline errors resulting in an underestimation of existing retail floorspace.</li> <li>• Takes no account of developments which have ceased trading.</li> <li>• Takes no account of developments which have changed use.</li> <li>• Takes no account of change of retail class.</li> <li>• Takes an incorrect account of new retail trading since 2001.</li> <li>• Per capita growth rates to 2016 are misaligned.</li> </ul>
<b>52</b>	<b>McGill Planning</b>	June 18 <sup>th</sup>	<p>On behalf of Brunello Developments Ltd re. SDS An Post site, Naas Road, Dublin 22</p> <ul style="list-style-type: none"> <li>• The strategy should parallel with the emerging Naas Road Gateway Plan and designate a Level 3 District Centre to serve the area.</li> <li>• More robust guidance on Retail Warehouse Parks</li> <li>• This site is suitable for 'Showcase Retailing'</li> <li>• Agree with qualitative approach</li> <li>• Concern over existing/planned floorspace.</li> </ul>
<b>53</b>	<b>Becbay Ltd</b>	June 18 <sup>th</sup>	<p>Re. the Glass Bottle Site.</p> <ul style="list-style-type: none"> <li>• Requests that the strategy supports the retail provision outlined in the Poolbeg Peninsula Masterplan</li> </ul>

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			<p>Area on the subject site.</p> <ul style="list-style-type: none"> <li>• Overall provide reference to the expansion of Poolbeg.</li> <li>• Consistency required in reference to terminology used for floorspace.</li> <li>• Transportation infrastructure is given weight re. site selection for major retail developments.</li> <li>• Give weight to the benefits derived from additional retail floorspace in terms of regeneration and employment.</li> </ul>
<b>54</b>	<b>DTZ</b>	June 18 <sup>th</sup>	<p>On behalf of the Dublin Docklands Development Authority  Docklands is specified as a Level 3 Centre  DCC specific policies should be extended to include Docklands  The need to strategically redress retail deficiencies in the South Docks should be recognised.</p>
<b>55</b>	<b>Conroy Crowe Kelly Architects and Urban Designers</b>	June 18 <sup>th</sup>	<p>On behalf of Gannon Homes Ltd.</p> <ul style="list-style-type: none"> <li>• Clongriffin should be a Level 3 Centre in the retail hierarchy.</li> </ul>
<b>56</b>	<b>Kenny Planning Associates</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• <b>Section 6.40</b> -The Retail Strategy should give Planning Authorities greater confidence to not require RIS in situations when focusing particularly on qualitative factors.</li> <li>• Pre-app meetings should be actively encouraged.</li> <li>• <b>Section 6.45</b> – The strategy should aim to redress the negative connotation of the term ‘impact’ used in retail planning.</li> <li>• Suggests that the strategy should include a table which sets out broad positive and negative impacts for consideration – such a table would be an indicative checklist for applicants and planning authorities.</li> <li>• <b>Section 6.47-6.55</b> - As the application and assessment of sequential tests can be controversial, thus if they are to be applied more stringently, there should be more guidance on what is best practice.</li> <li>• The strategy is an opportunity to provide a more pragmatic means of assessing retail impact, making it more transparent.</li> </ul>
<b>57</b>	<b>Conroy Crowe Kelly</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• Strategy is written in isolation of the wider recognition of the need to create sustainable places, where land use and transportation planning are considered in tandem and where urban design is to the forefront of planning.</li> <li>• Shopping centres are not major town centres. Town Centre should not be used as a euphemism for shopping centre.</li> <li>• Strategy provides no comprehensive definition of Major Town Centres and Town and/or District Centres.</li> <li>• There should be provision for biasing real Towns over shopping centres.</li> <li>• Qualitative criteria could be established by the inclusion of an Urban Design section written by suitably qualified personnel.</li> </ul>

	<b>Subject</b> →		
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			<ul style="list-style-type: none"> <li>• Ballymun should be included as a Level 3 Centre</li> <li>• Clongriffin should be included as a Level 3 Centre, like the new towns of Adamstown and Clonburris.</li> </ul>
<b>58</b>	<b>Dublin Transportation Office</b>	June 18 <sup>th</sup>	<ul style="list-style-type: none"> <li>• The policy shift to integrated transport solutions needs to be fully reflected in the strategy.</li> <li>• A clear correlation between the retail hierarchy in the strategy and the settlement hierarchy in the RPGs needs to be established.</li> <li>• The strategy should provide guidance on the appropriate forms of access to retail facilities at all levels, informed by clearly defined catchment populations and accessibility objectives relating to all modes.</li> <li>• Retail development in the GDA should not be planned around distribution within LA areas, but instead in the GDA as a whole in support of RPG and DTO guidance.</li> <li>• Concern that existing unbuilt permissions are not included.</li> <li>• Overall advises against any further retail floorspace allocations in excess of calculated floorspace figures.</li> </ul>
<b>59</b>	<b>McGill Planning</b>	June 18 <sup>th</sup>	<p>On behalf of Arnotts Properties</p> <ul style="list-style-type: none"> <li>• Highlights Northern Quarter (under consideration by ABP)</li> <li>• More robust guidance on Retail Warehouse Parks</li> <li>• Agree with qualitative approach</li> <li>• Concern over existing/planned floorspace.</li> </ul>