

FASSAROE PHASE 1 SHD DEVELOPMENT

Retail Impact Assessment

CP19001
Fassaroe Phase 1 SHD
Application
F01
06 April 2022

Document status					
Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	For Planning	LM	ML	ML	06/04/2022

Approval for issue	
ML	7 April 2022

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1 INTRODUCTION

The purpose of this Retail Impact Assessment (RIA) is to support a planning application which is being made by Cosgrave Property Group for a Strategic Housing Development at Fassaroe, Bray, Co. Wicklow. This incorporates the first phase of the Neighbourhood Centre to serve the overall development lands at Fassaroe. This report has been prepared in accordance with the *Retail Planning – Guidelines for Planning Authorities* (2012).

The aim of this Retail Impact Assessment is to examine the scale of the retail provision proposed with reference to the quantum of residential development proposed and the proposals for future phases of further residential development at Fassaroe. It considers the suitability of the scale now proposed and its likely or implications for other existing retail provision within the wider area.

The retail element of this proposal is assessed from a quantitative perspective in **Section 2** of this report, and from a qualitative perspective in **Section 3**.

1.1 Retail Proposal

The proposed development which is subject of this Retail Impact Assessment comprises of a Strategic Housing Development of amongst other elements, 650 No. residential uses and 1,035 sq.m. of retail /commercial space within a Neighbourhood Centre and a 108sq.m. retail unit / café kiosk in the District Park. Also proposed within the first phase of the Neighbourhood Centre under this current application are a 480sq.m. community concierge area (to serve the entire Fassaroe development), a 360sq.m. café, 63 No apartments and residential ancillary uses for the residents of the neighbourhood centre (residents lounge (256sq.m., residents concierge (68sq.m.) and residents gym (90sq.m.)).

A second phase neighbourhood centre application will be brought forward as part of a future further residential application at Fassaroe such that retail services can be rolled out in appropriate sequence with residential population growth at Fassaroe. The second phase application will incorporate an anchor foodstore and possibly also some comparison space. The overall scale of the future fully completed Neighbourhood Centre would be within the maximum Neighbourhood Centre size set in the Wicklow County Development Plan.

It is assumed for the purposes of this assessment that the occupiers of the proposed retail units will include both convenience and comparison retailers and may also include services such as hair salons. For the purposes of this assessment and to undertake a cautious impact assessment it will be assumed that 70% of the net sales floor area will be for convenience sales and 30% for comparison sales or other commercial activities.

Table 1 sets out the Gross Floor Area, assumed Net Sales Area and assumed Net Convenience Sales Area.

Table 1: Breakdown of Retail Floorspace in the Proposed Development

	GROSS sq.m.	NET Sales Area m ²	Net Convenience Sales Area m ²
Neighbourhood Centre Retail / Commercial Unit 1	400 sq.m.	360 sq.m. *	252 sq.m.
Neighbourhood Centre Retail / Commercial Unit 2	635 sq.m.	571 sq.m. *	400 sq.m.
District Park Café Kiosk / retail unit	108 sq.m.	50 sq.m. *	50 sq.m.
Total	1,143 sq.m.	981 sq.m.	702 sq.m

Notes: * Assume Net Retail Area in the Neighbourhood Centre will be 90% of GFA – it will depend on the final operators and fit-out.

** Assume Net Retail Area within District Park kiosk will be 50% (likely part used for café) - will depend on final operator

The following definitions and terminology have been used in this assessment in accordance with those used in the *Retail Planning Guidelines for Planning Authorities* (2012):

- **Gross Retail Area** – This is the total floorspace, as measured from inside the shop walls, which includes sales space, plus storage space, offices, toilets, canteen and circulation space.
- **Net Retail Area** – The area within the shop or store which is visible to the public and to which the public has access, including fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff, areas occupied by retail concessionaires, customer service areas, and internal lobbies in which goods are displayed, but excluding cafés and customer toilets.

1.2 Sequential Approach

The subject site is located at the centre of the Fassaroe Action Area within an area designated for a Neighbourhood Centre under the Bray Municipal District LAP 2018.

With regard to the location of new retail development, the *Retail Planning Guidelines* advocate the sequential approach to site selection. They state that where the planning authority is satisfied that there are no sites or potential sites within a city, town centre or designated district centre, an edge-of-centre site should be considered, and only failing both options can an out-of-centre site be considered. It further states that where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority **that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach are not required.**

The proposed neighbourhood centre at Fassaroe will be located within a site specifically designated for such including the provision of retail floorspace. It is therefore submitted, with reference to the provisions of the Guidelines and the specific context and characteristics of the site, that a sequential test is not required in this instance as the retail provision is proposed within the designated retail core area.

The modestly sized retail unit / café kiosk within the District Park is specifically located in this area to serve a long term function as an amenity for users of the District Park but also in the short term pending the construction of the first phase of the Neighbourhood Centre it will provide some local convenience shopping for the first occupiers of the scheme. In this regard it is considered appropriately located close to housing and within the District Park which will be developed in the first phases of the overall Fassaroe construction.

2 QUANTITATIVE ASSESSMENT

The methodology adopted in this assessment generally follows that outlined in the Retail Planning Guidelines for Planning Authorities, 2012. The methodology comprises the steps as outlined in **Table 2** hereunder.

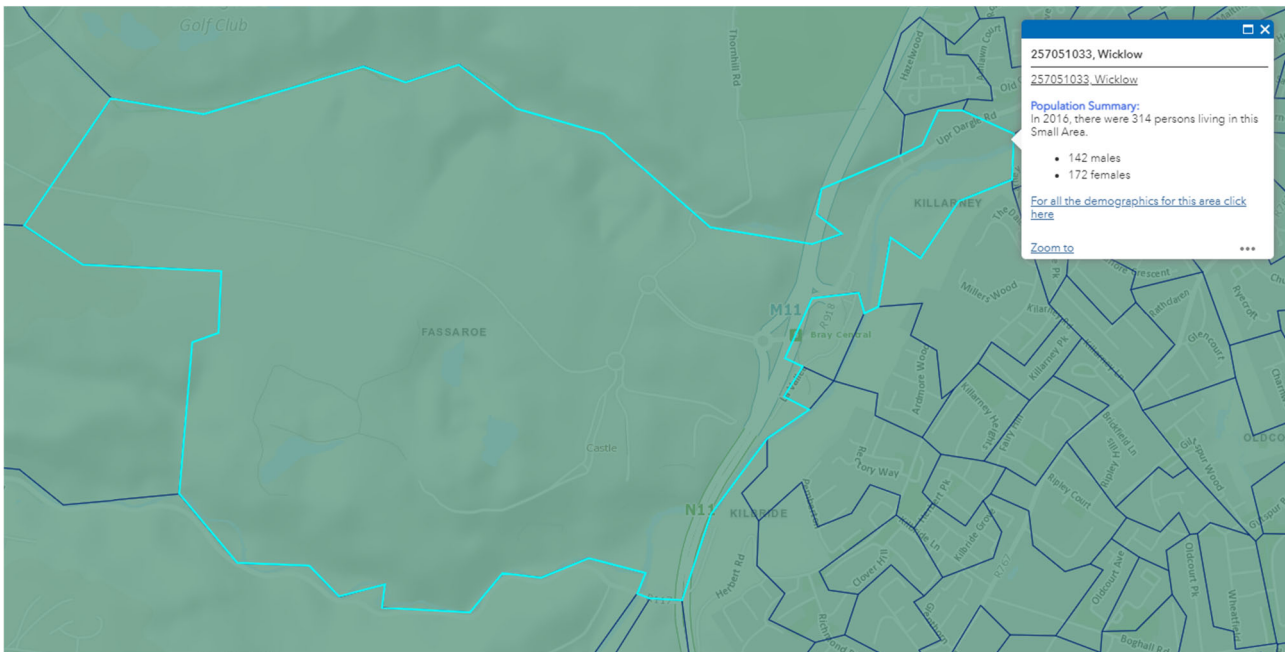
Table 2: Retail Impact Assessment Methodology

Retail Impact Assessment Methodology	
I	Identification of Catchment Area
II	Estimation of Expenditure Available within Catchment Area for Phase 1 Development
III	Estimation of the Turnover Required to Support Proposed Phase 1 Retail Development
IV	Alignment of Locally Available Expenditure with Development Proposals

2.1 Identification of Catchment Area

The catchment area for the purpose of this assessment is based on the Central Statistics Office Small Area Code SA 257051033. This Small Area encompasses the development site along with small area of land immediately surrounding the site. **Figure 1** below illustrates the proposed catchment area.

Figure 1: Catchment Area



Source: Central Statistics Office
[\(https://www.cso.ie/en/census/census2016reports/census2016smallareapopulationstatistics/\)](https://www.cso.ie/en/census/census2016reports/census2016smallareapopulationstatistics/)

The population of the Small Area in 2016 was 314. According to the 2011 Census, the population of the area was 294, meaning the catchment area experienced a 6.4% increase in population between 2011 and 2016. While the next Census should have been carried out in 2021, the decision was made to postpone this until April 2022 as a result of the COVID-19 pandemic. However, assuming the population grew by another 6.4% in this period, this would suggest an increase in population within the catchment to 334 in 2021. **Table 3** sets out the population within the catchment for 2011 and 2016, with an estimate of the population for 2021 based on the pattern of population growth between 2011 and 2016.

Table 3: Catchment Area Population

	2011	2016	2021 (Estimated)
Small Area Code SA 25705103	294	314	334

Source: Central Statistics Office Census 2011 and Census 2016 Results

For the purposes of this assessment, the retail elements within the proposed neighbourhood centre will be examined in the context of the additional population provided by the proposed residential units. The average household size within the state was 2.75 persons per household. Assuming similar occupancy levels within the proposed development, the 650 no. residential units would result in an additional population of 1,788. Considering the estimated 334 people in the area currently, the neighbourhood centre based on the proposed Phase 1 development would be operating with a total population within the catchment area of 2,122.

2.2 Estimation of Expenditure Available within Catchment Area

There is limited data available on recent per capita expenditure on convenience goods. The Wicklow County Development Plan 2010-2016 set out a project expenditure in 2016 as €3,288. The Retail Strategy for the Greater Dublin Area 2008-2016 sets out an average annual growth rate for convenience expenditure per capita of 0.8% between 2006-2011. This rate was a dramatic increase from the 2001-2006 period where there was an average decrease in convenience expenditure per capita of 0.33%. It is therefore considered appropriate to estimate a cautious annual increase of 1% per annum with respect to per capita expenditure since 2016. This would result in an estimated rise to €3,490 by 2022, and €3,632 by 2026. Total expenditure in 2022 does not account for any new population with the proposed Fassaroe development.

Convenience expenditure for the catchment is estimated at €1.15 million in 2022 and €7.6 million in 2026 with the Phase 1 development complete as identified in **Table 4** below.

Table 4: Available Convenience Goods Expenditure for Catchment Area

Year	Population	Expenditure	Total
2022	334	€3,456	€1,154,304
2026 (Estimated Completion of Proposed Development)	2,122	€3,632	€7,707,104

2.3 Estimate of Convenience Turnover of Proposed Development

Turnover is based on net floor area of convenience retail space. Unfortunately, there is limited information available on recent turnover rates in the area. The generally accepted industry standard estimates a turnover of €10,000 per sq.m. The overall estimated turnover for the development is shown in **Table 5** below.

Table 5: Estimated Turnover of Proposed Development

Net Convenience Floor Area	Average Turnover	Total
702 sq.m.	€10,000	€7,020,000

2.4 Alignment of Locally Available Expenditure and Proposed Retail Provision

Based on the calculations above, the population which will result from the Phase 1 development combined with the existing local population in the immediate vicinity will likely be sufficient to support the quantum of retail provision proposed on site without diverting expenditure from other areas or having adverse impacts on existing services within Bray or Enniskerry. This assumes that some of the retail space proposed will accommodate some level of comparison retail and / or personal services (30%).

It is concluded that the nature and quantum of retail provision is appropriate for the scale of Phase 1 development proposed and will not give rise to adverse impacts outside of its immediate catchment area.

3 QUALITATIVE ASSESSMENT

3.1 Retail Planning – Guidelines for Planning Authorities, 2012

The *Retail Planning – Guidelines for Planning Authorities* (2012) include a list of retail impact criterion which should be considered within an RIA. For the purpose of this assessment, the set of criterion as outlined within the Retail Planning Guidelines are addressed below.

“Support the long-term strategy for city / town centres as established in the retail strategy and/or development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres;”

It is submitted that the proposed neighbourhood centre will have a complementary role rather than a competitive role to the stores in Bray and Enniskerry as it will reduce leakage outside of the area. Given the relatively small scale of the proposed development and neighbourhood centre function, it is envisaged that it will serve a local role in providing services to people working and living within the Fassaroe development. The proposed development will not diminish the role of these existing town/village centres but rather will enhance the vitality and viability of the centres by retaining custom currently lost through leakage and providing an impetus to other new businesses to be established in the area as part of future phases of development.

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

The subject proposal is to develop a mixed-use scheme including the first phase of a new neighbourhood centre on a site which is zoned for development. The development of this site will increase economic activities and associated employment opportunities within the area while catering for the needs of local residents within Fassaroe.

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

Although there is an amount of retail floorspace in Bray and Enniskerry at present we would note that the target retail market for this new retail provision will mainly be those living and working within the proposed Fassaroe development. Given, the scale and location of the current proposals, it is unlikely to cater to a wide catchment beyond Fassaroe. However, given its function as a Neighbourhood Centre to serve a local population it is considered appropriate that it does not attract considerable numbers of consumers from outside of the immediate area as this may have adverse impacts on existing service provision in Bray or Enniskerry town centres.

“Respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support;”

The proposed development will provide an appropriate retail facility to serve the population within the local area. It will have the benefit of enhancing the range of services and activities that will be available to future residents.

“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, including the public realm, or its wider function in the promotion and encouragement of the arts, culture and leisure, all critical to the economic and social life of the community;”

The quantitative analysis included in this report concludes that the level of retail provision proposed is appropriate to serve the needs of the planned population without adversely affecting other centres.

“Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;”

The quantitative assessment demonstrates that the proposed retail units are of a suitable size and scale to cater for and be supported by the population generated by the proposed residential units. Therefore, the proposal will not impact on the existing convenience stores within the wider area. The proposed stores will not lead to the closure of any of the existing convenience outlets within the wider or local catchment area currently.

It is not envisaged that the development will result in an increase in vacancies.

“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”

The overall proposed development is highly accessible by foot and bicycle. A bus service will also run through the lands with a stop at the Neighbourhood centre and other stops in close proximity to all housing areas. On-site parking will be provided also for those wishing to access the services by private car.

“Link effectively with an existing city/ town centre so that there is likely to be commercial synergy.”

The subject scheme as proposed forms part of a planned extension to Bray Town. The existing town centre of Bray will be within walking distance to this area and will be easily accessible by the proposed public bus service that will link Fassaroe to Bray town centre. It is therefore submitted that the proposed development will create commercial synergy with the town centre.

We conclude therefore that the proposed development is in accordance with the *Retail Planning – Guidelines for Planning Authorities* (2012). The above assessment shows that there will not be a material adverse impact on the vitality and viability of catchment area or indeed any other settlement in the region.

3.2 Wicklow County Development Plan 2016-2022

The Wicklow County Development Plan 2016-2022 recognises the need for an urban expansion into Fassaroe. As part of this, there are provisions for the development of a neighbourhood centre at Fassaroe, with indicative additional retail floorspace of 2,500sq.m. convenience and 1,000sq.m. comparison. Along with this, the following is specifically noted.

“Within the expansion area of Fassaroe, the Planning Authority will facilitate the provision for the development of appropriately scaled retail provision, which provides for the immediate needs of residents and employees of the area but does not undermine the role of Bray town centre as the principal shopping destination in the settlement.”

The quantitative assessment above demonstrates that the magnitude of retail floorspace currently proposed would be suitable to cater for the local population without undermining the role of Bray town centre.

Objective RT26 sets out the following in relation to Neighbourhood Centres:

“Within neighbourhood centres, it is the objective of the Planning Authority to protect, provide for, and improve the mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community, to a degree that is akin to their role and function as outlined in the Retail Strategy.”

The proposed first phase of the neighbourhood centre constitutes the first phase of retail development within Fassaroe. As noted above, the quantum of floorspace is appropriate in the context of the population which will occupy the proposed residential units. Along with this, the proposed neighbourhood centre includes 2 no. retail units along with a café and other services such as the community concierge. The range of services and facilities are considered appropriate to provide for the local community, and therefore complies with Objective RT26. The retail units are also capable of being subdivided for other sizes / numbers of units such that it will be adaptable for emerging demand.

3.3 Bray Municipal District Local Area Plan 2018-2024

The Bray Municipal District Local Area Plan (LAP) 2018-2024 sets out the same considerations for the neighbourhood centre at Fassaroe as the County Development Plan, noting the same indicative floorspaces and the importance that Bray town centre is not undermined. Along with this, Objective BT4 of the LAP provides the same goals for neighbourhood centres as set out in Objective RT26 above.

4 CONCLUSION

The subject proposal is to develop a strategic housing development including a first phase of a new neighbourhood centre on a site which is zoned for development. The retail provision proposed will appropriately cater for the needs of the future population of Fassaroe. As the population grows and with further future planning applications the scale and range of retail provision at the Neighbourhood Centre will also grow.

A quantitative assessment has been carried out. This indicates that there will be capacity / suitable available expenditure generated within the immediate catchment area of the development to support the proposed development, without undermining the role of Bray town centre as the local retail core.

No negative impact is expected on the existing stores in Enniskerry or Bray Town as the quantum of floorspace currently proposed is appropriate to meet the needs of the population within the proposed residential units and the existing immediate population.

The proposed development is consistent with the guidance of the *Retail Planning – Guidelines for Planning Authorities* (2012), the Wicklow County Development Plan 2016-2022 and the Bray Municipal District Local Area Plan 2018-2024. It is therefore submitted that the proposed development will create commercial synergy with the town centre of Bray.

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