

Retail Planning

Guidelines for Planning Authorities

January 2005

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(Teil: 01 - 6476834/35/36/37; Fax: 01 - 6476843)
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DUBLIN
PUBLISHED BY THE STATIONERY OFFICE
To be purchased directly from the
GOVERNMENT PUBLICATIONS SALE OFFICE
SUN ALLIANCE HOUSE, MOLESWORTH STREET, DUBLIN 2,
or by mail order from
GOVERNMENT PUBLICATIONS, POSTAL TRADE SECTION,
51 ST. STEPHEN'S GREEN, DUBLIN 2,
(Tel: 01 - 6476834/35/36/37; Fax: 01 - 6476843)
or through any bookseller.

€4.00
Prn 4246

January, 2005

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Policy Context

Background

1. These Retail Planning Guidelines provide a comprehensive framework to guide local authorities in preparing development plans and assessing applications for planning permission and to guide retailers and developers in formulating development proposals. These guidelines update and replace the policy on retail development set out in the Local Government (Planning and Development) General Policy Directive (Shopping), 1998. The guidelines published in December 2000, which came into effect from 1 January 2001, have been reviewed insofar as they relate to retail warehouses. These revised guidelines contain new policies regarding large retail warehouses and take effect from 1 February 2005. These guidelines are Ministerial guidelines under Section 28 of the Planning and Development Act, 2000. Section 28 provides that planning authorities and An Bord Pleanála shall have regard to Ministerial guidelines in the performance of their functions.
2. Retail Planning Guidelines were first issued in 1982 under The Local Government (Planning and Development) General Policy Directive. This Directive provided general advice regarding large scale additions to existing retail shopping capacity. It has now become apparent that this Directive did not provide sufficiently focused and specific criteria for assessing proposals or for preparing development plans.
3. Consequently in June 1998 the Minister issued the Local Government (Planning and Development) General Policy Directive (Shopping) 1998. This Directive repeated much of the generalised advice contained in the early Directive. The principal change however, was to place an embargo on the grant of planning permission for any supermarket (or an extension to one) in excess of 3,000 square metres. The accompanying

circular letter to this Directive indicated that comprehensive Planning Guidelines on shopping development were to be prepared. Elsewhere in Europe there are national planning guidelines relating to retail development in individual member states of the EU. In mainland Europe many countries have introduced floorspace caps on retail development whilst in the UK there is clear focus on locational priorities.

4. In April 1999 the Department of the Environment and Local Government published Draft Retail Planning Guidelines for public consultation. A number of written responses were received. The Department, in conjunction with the Department of Enterprise, Trade and Employment also commissioned a study by Goodbody Economic Consultants of the *Economic Impact of the Draft Retail Planning Guidelines on the Retail Sector*. That report and the written consultation responses have been reviewed. A further consultation process, in relation to a review of the floorspace cap on retail warehouses, was initiated in August 2003. Account has been taken of points raised in the latter consultations in the preparation of these revised Retail Planning Guidelines.

Retail Hierarchy

5. The retail hierarchy reflects both the primacy of Dublin in the settlement structure of the State and small scale, low residential densities in rural areas at the other end of the settlement pattern. Generally speaking, retail functions reflect four broad tiers of urban development. The classification is indicative and the specific retail functions provided by each tier overlap in many respects; below Dublin, there are no clearly defined cut-off points between levels of the hierarchy.

6. Metropolitan Dublin, which contains a little over 30 per cent of the total population, accounts for 41 per cent of all comparison turnover and 31 per cent of convenience turnover¹. As well as providing the broadest range of comparison goods shopping, it supplies retail functions of a specialist nature not found elsewhere in the State.
7. Cork, Limerick, Galway and Waterford, with a combined urban population amounting to 10 per cent of the State, account between them for a further 19 per cent of comparison turnover and 15 per cent of convenience turnover. Together with Dublin, these centres provide a range of high-order comparison shopping which is largely unmatched elsewhere.
8. A third tier of towns cannot be precisely defined but includes Athlone, Carlow, Castlebar, Clonmel, Drogheda, Dundalk, Ennis, Kilkenny, Letterkenny, Monaghan, Mullingar, Newbridge, Portlaoise, Tralee, Tullamore and Wexford. The combined population of these towns amounts to six per cent of the State total and they account between them for a further 18 per cent of comparison turnover. The vibrancy of these centres, some of which are now attaining functions previously found only in higher order centres, is demonstrated by the fact that at least 75,000 square metres of comparison floorspace (as well as 45,000 square metres of convenience floorspace) was added to these centres between 1987 and 1996.
9. The first three tiers in the hierarchy account for 78 per cent of comparison turnover. They also account for nearly two-thirds of convenience turnover.
10. However, there are a further group of towns which may also be regarded as third tier shopping locations, albeit to a more limited extent. These contain convenience

¹ Data relates to 1996: consultants' estimates

goods outlets on a par with settlements listed above. Most have national supermarket chain representation. Examples are Arklow, Athy, Ballina, Cavan, Dungarvan, Enniscorthy, Killarney, Longford, Mallow, Middleton, Naas, Navan, Nenagh, New Ross, Sligo, Swords and Thurles. Many of these towns also have significant comparison goods shopping.

11. The density of third tier centres is related to overall population density. It is highest in the East and South-east and falls off towards the West and North. The last named centres are of particular importance in less densely settled areas of the State, where they provide urban anchors for a rural economy which is undergoing rapid change.
12. The fourth tier of the hierarchy comprises a large number of small towns in the 1,500 to 5,000 population category. There are some 75 in all, comprising six per cent of the State population, most of which provide basic convenience shopping, either in small supermarkets or convenience shops and in some cases, lower order comparison shopping such as hardware, pharmaceutical products and clothes.
13. Beyond these tiers, shopping at the most local level is provided by corner shops in suburban areas and village stores and post-offices. The rural shop and post-office is recognised as having particular importance in supporting social and economic life in remoter rural areas.

Pressure For Development

14. Over the last decade there has been increasing pressure for retail development. Between 1987-1998 some 400,000 square metres has been implemented in schemes over 2,000 square metres. Currently there are proposals to develop a further half million square metres of additional floorspace.

15. Over this period a number of European retailers have sought to enter the Irish market by renting space and operating new retail formats. Others have begun a programme of new development. Some overseas retailers have gained access to the Irish market by buying out indigenous retail companies.
16. There is an increasing demand for larger store sizes. This is difficult to achieve in traditional town centres where prime retail pitch often comprises relatively small scale historic buildings in an attractive setting. Furthermore, it is becoming increasingly difficult to access prime pitch easily by car and park nearby. Consequently there has been a move over the last five years or so to decentralise large scale retail provision to out-of-centre locations.

Spending Growth and Floorspace Requirements

17. The principal underlying reason for market interest in development is the sustained rate of growth of the Irish economy. The 1990s was a decade of exceptional growth for the Irish economy. GDP grew by about 7 per cent per annum on average (9 per cent since 1993). Employment has expanded by over a quarter and unemployment has fallen and is continuing to fall².
18. Forecasts over the last few years suggest that GDP annual volume growth rates will continue at a high rate in the short term. In the longer term more moderate growth is expected as workforce growth is reduced, lessening the structural capacity of the economy to grow.
19. The sustained level of growth in Ireland since the mid 1990s is unprecedented in Western Europe at the present time and is fuelling substantial annual increases in consumer spending on retail goods. The factors which are generating economic growth are also those

²

Unemployment rate, ILO basis, is expected to average 6.7 per cent of the labour force in the period 2000-2005.

which are driving consumer spending: net immigration, largely of skilled and economically active persons, and increase in the numbers reaching working age and rapid increases in female participation rates. These changes in the labour force are reinforced by increases in educational attainment and therefore earnings. Household size and economic dependency rates are falling.

20. Continuation of these growth trends is likely to generate a requirement for substantial additions to the existing stock of retail floorspace. The specific requirement for additional development will depend on the long term performance of the economy, trends in consumer spending and the way in which retailers react to changing market conditions. The majority requirement is likely to be for comparison goods floorspace (including retail warehousing), although there will be a continuing need to provide for additional convenience goods floorspace.

Policy Objectives

21. The challenge to be faced is how to accommodate the additional development that is projected to be required in a way which is efficient, equitable and sustainable. It is important to establish 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. In this way retail development can be guided by development plans. These Guidelines identify five key objectives which have equal weight.
22. The first objective of national policy is to ensure that in future all development plans incorporate clear policies and proposals for retail development.

23. This first objective should in turn support a second objective of national policy: to facilitate a competitive and healthy environment for the retail industry of the future. It is not the purpose of the planning system to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting these guidelines local authorities should avoid taking actions which would adversely affect competition in the retail market.
24. Retail development is most accessible to customers where it is well located within its catchment area and is accessed both by public transport and the private car. The third objective of policy, therefore, is to promote forms of development which are easily accessible - particularly by public transport - in a location which encourages multi-purpose shopping, business and leisure trips on the same journey.
25. Consequently, the fourth objective is to support the continuing role of town and district centres. This will assist in reinforcing the investment in urban renewal which has been made already. These established centres should be the preferred locations for developments that attract many trips. This policy will also support their role as centres of social and business interaction in the community. In order to achieve this objective the preferred location for retail development, should be within town centres, consistent with the requirement to achieve good access especially by public transport. If there are no development sites available within a town centre then the next preference should be a location on the edge of the town centre. Only where there are no sites, or potential sites, within a town centre or on its edge, or satisfactory transport accessibility (including park and ride) realistically cannot be ensured within a reasonable period of time, should out of centre development be contemplated.
26. The fifth, and final objective is a presumption against large retail centres located adjacent or close to existing,

new or planned national roads/motorways. Such centres can lead to an inefficient use of costly and valuable infrastructure and may have the potential to undermine the regional/national transport role of the roads concerned. However, as a limited exception, large retail warehouses may be considered for locations close to such road networks where the proposed development would be situated in an Integrated Area Plan area in a Gateway (designated by the National Spatial Strategy) and where the road network has sufficient capacity to cater for the scale of development proposed (See also paragraphs 84a – 84e).

The Role of Town Centres

27. Town centres, together with district centres and major village centres serving rural areas provide a broad range of facilities and services and act as a focus for the local community. In this guidance the term "town centre" is used to refer to district centres as well as centres of smaller settlements. The Government attaches importance to the improvement of town centres and in the following paragraphs (28-35) advice is provided on approaches to planning for successful town centres.
28. The town centre is the focus for a range of commercial and community activities, resulting in a mix of, often interdependent, land uses which contribute to a sense of place and identity. It includes a combination of natural features: historic buildings, cultural, civic and governmental buildings, as well as public spaces. This physical form and mix of functions, which will have evolved over a considerable period of time, makes a town centre different from a shopping centre and provides much of its character which can be further enhanced by introducing appropriate new uses into historic buildings. It also has a high level of accessibility to employment, services, and facilities for all the community.

29. Shopping provision is a key component of town centres, and makes a major contribution to their vitality and viability. It is important therefore that they retain retailing as a core function. Considerable investment has already taken place in town centres and planning policies should seek to sustain and enhance their role, including new retailing developments and other key uses. The role of town centres can change over time. Planning authorities should have regard to the changing role of towns and the value of maintaining retailing when preparing development plans and considering applications for new development.

Vitality and Viability

30. In order for town centres to achieve their full potential and continually improve as retail destinations it will be appropriate and necessary for planning authorities to adopt a pro-active role in enhancing the vitality and viability of their centre(s). The concept of vitality and viability is central to sustaining and enhancing town centres. Vitality is a measure of how active and buoyant a centre is, whilst viability refers to the commercial well-being of a town. In combination they highlight the relative strength and success in the retail hierarchy. This will depend on many factors, including the range and quality of activities in a centre, its mix of uses, its accessibility to people living and working in the area and its general amenity, appearance and safety. Although no single indicator on its own can effectively measure the "health" of a town centre, the use of a series of them, described in Annex 2, can provide a view of performance and so offer a framework for assessing vitality and viability.
31. Planning authorities, especially in areas with a well-developed hierarchy of retail centres, should assess objectively the relative strength of the main towns in their area by carrying out a health check assessment. This should be undertaken using a consistent methodology and updated regularly. Such health checks should both inform and be undertaken within the framework provided by the development plan.

Town Centre Strategy

32. The outcome of the healthcheck appraisal of town centres will indicate both areas of weakness and opportunity. It will be necessary to formulate a comprehensive response which makes better use of a centre's resources and potential and address major deficiencies. It should aim for a realistic vision for the centre, drawing on the support of all interested parties and an implementable programme of action.
33. It is not sufficient for planning authorities to merely formulate policies which seek to preserve the present shopping hierarchy without addressing the key issues facing town centres. It will normally be appropriate to address the following matters:
- The availability of development opportunities and the need to promote land assembly.
 - Encouraging a diversity of uses in the town centre throughout the day and evening.
 - Ensuring accessibility by a range of transport types, including reviewing the car parking strategy.
 - Creating an attractive and safe town centre for pedestrians.
 - Undertaking effective management and promotion of the town centre.
34. Positive action to promote change may include the identification of development opportunities, site assembly, better access for public transport, cyclists and pedestrians, and environmental improvements including improving the attractiveness of townscape and open spaces. Renewal opportunities may also arise where underused property and land might be brought back into more productive use through joint action, using Section 212 of the Planning and Development Act, 2000 or through other initiatives such as Integrated Area

Plans. Improved town centre management could also help in the co-ordination and implementation of a range of activities in support of the strategy.

35. The scope and opportunity for the greater use of public transport is a long term challenge, but the process of developing such systems and encouraging their use can be facilitated by choosing accessible sites in town centres for retail and related development. In the meantime, ensuring good access to town centres is important in order to maintain their competitiveness. Heavy demand for access by car generates demand for parking spaces which can create congestion, pollution and parking problems, affecting the convenience, attractiveness and competitiveness of the centre. Planning authorities should:
- Develop a comprehensive traffic management strategy, and in particular establish clear parking policies.
 - Ensure that parking provision serves the need of the town centre as a whole, rather than exclusive use of a particular development.
 - Work with public transport operators to improve services and facilitate the provision of park and ride schemes associated with new development and to serve the town centre as a whole.
 - Meet the access and mobility needs of disabled people.
 - Improve access and safety for cyclists and pedestrian visitors through the introduction of cycle routes, pedestrianised streets and park and walk schemes and incorporating a careful appraisal of the safety aspects of new development proposals.

Development Plans

Function of Development Plan Retail Policies

36. The development plan system, including both County and City Development Plans, encompasses both strategic planning policies and programmes and more localised action initiatives (including the preparation of town centre strategies). County Councils and City Councils will need to prepare retail policies for their administrative areas. However, because retail planning requires consideration of the catchment area of retail centres which usually do not co-incide with local authority boundaries, paragraph 8 of Annex 3 sets out those issues which may need to be considered by planning authorities in relation to cross-boundary retail catchments. Emerging regional plans should also review the hierarchy of settlements and town centres and provide broad guidelines on priorities for the location of additional retail development across the region. Such general regional guidelines should not be constrained by administrative boundaries which cut across catchment areas. The matters which are to be included in all future development plans for Counties and Cities are:
- (i) Confirmation of the retail hierarchy, the role of centres and the size of the main town centres.
 - (ii) Definition in the development plan of the boundaries of the core shopping area of town centres.
 - (iii) A broad assessment of the requirement for additional retail floorspace.
 - (iv) Strategic guidance on the location and scale of retail development.
 - (v) Preparation of policies and action initiatives to encourage the improvement of town centres.
 - (vi) Identification of criteria for the assessment of retail developments.

37. In dealing with these matters, planning authorities should take account of the views of retailers, shoppers, property owners and transport operators (and in the case of Dublin, the DTO). In assessing the need for additional development for different types of retailing it is important that the assessments are based on a realistic appraisal of both expenditure change and market requirements. Plans should be based on up to date information regarding existing retail floorspace and shopping patterns in the area. The range of detail and complexity required to address retail planning issues varies depending on the extent of urbanisation, population density and number of centres. In Metropolitan Dublin, Cork and other major urban centres, there is a far greater requirement for detailed development plan policies than in largely rural centres.

Detailed Strategy

38. Consequently it will be necessary for the more urban counties to prepare retail strategies and policies for their areas which are more detailed than in more rural areas. Furthermore, in some locations it will be necessary for counties to co-operate with one another in preparing retail strategies. In the following areas the specified Counties and Cities should jointly prepare comprehensive retail strategies and policies addressing the matters set out at paragraph 36(i-vi) with the intention of incorporating the strategies and policies in the appropriate development plan:

Area	Relevant County or City
Greater Dublin Area*	Dublin City Council and Counties Fingal, Dun Laoghaire/Rathdown and South Dublin, Kildare, Meath and Wicklow
Greater Cork	County Cork and Cork City Council
Greater Waterford	County Waterford, Waterford City Council, County Wexford and County Kilkenny
Galway	County Galway and Galway City Council
Limerick	County Limerick, County Clare and Limerick City Council
Drogheda/Dundalk	County Louth and County Meath
Athlone	County Westmeath and County Roscommon

* As defined in the Strategic Planning Guidelines for the Greater Dublin Area.

39. The background studies to be carried out to underpin the retail planning strategy should define the boundaries for the area to be covered.
40. In order to plan for future development, the relevant counties should assess the broad requirement for additional development over the plan period. This assessment should take account of both emerging demands in the retail market and a general estimate of future requirements based on projected changes in the local population and consumer spending. It would assist all parties if such estimates are founded on a

common standardised approach. Advice on an appropriate approach is contained in Annex 3. These assessments of future retail requirements are intended to provide broad guidance as to the additional quantum of convenience and comparison floorspace provision. They should not be treated in an overly prescriptive manner and should not seek to inhibit competition.

41. In preparing strategic guidelines relating to the location and scale of future development county councils will disregard the potential benefits of commercial rates which may accrue to the Council (or any other Council) as a consequence of planned retail development. The effect on local authority financial resources of retail development is not a material land use planning consideration which ought to be recognised.
42. The strategy to be incorporated into development plans should provide guidance as to the general location (name of town, district or major village centre) of new development. In order to achieve greater certainty, it will be necessary to provide a broad indication of the general scale of development envisaged at various locations as well as the precise boundaries of the core retail area of the town centres.
43. For the locations identified, the strategy should either identify specific alternative sites for development, or where this is not possible, establish criteria for the selection of sites. Where a criteria based approach is followed the criteria adopted should be sufficiently clear so as to allow clear evaluation of subsequent applications for planning permissions.
44. The traffic management policies to be adopted for town centres in development plans should include: the need for convenient public transport facilities and bus priority measures, the provision and location of car parking (including park and ride, or park and walk schemes), routes for pedestrians and cyclists, and disabled people to access the town centre and, the need

for traffic calming measures. Any areas for special initiatives to improve accessibility for people with disabilities, and for shoppers with prams or pushchairs should be clearly designated.

45. Both the performance of the national economy and local market forces change over time. It is inevitable therefore that any projection of change over the period of a development plan may turn out not to be completely accurate. This does not invalidate the benefit of preparing longer term strategic advice, however. Counties and Cities should regularly monitor trends and events in their area and update their policies accordingly at intervals of not less than six years.

General Strategies

46. In the remainder of the State counties not identified in paragraph 38 as being required to prepare a detailed retail planning strategy will prepare a more general statement of strategic intentions and future policy. The matters to be addressed are as set out at paragraph 36(i-vi).
47. In addressing items (iii) and (iv) it should not be necessary to estimate in any detail the future requirement for additional development. A broad assessment of requirements for additional development reflecting the local evidence of market interest and the need to provide good opportunities for retail provision to serve the main population centres in the county ought to be sufficient in order to formulate appropriate policies and criteria for dealing with new development proposals.

Large Convenience Store Floorspace Cap

48. The June 1998 Local Government (Planning and Development) General Policy Directive (Shopping) imposed a universal upper size limit on foodstore development throughout the State. A variety of views have been expressed on this point during the

consultation stage of preparing these Guidelines. The Goodbody Report indicates that economies of scale in food store operations may not be pronounced and are in any event exhausted at a level not much over 2,000 square metres. Consequently the imposition of a floorspace cap above this threshold would not have pronounced anti-competitive effects. In fact, by encouraging competition at the local level, one effect of the imposition of a cap could be to reduce the potential for creating local monopolies.

49. Based on this analysis and experience elsewhere in Europe the principle of applying a floorspace limit on foodstore development is well founded. The existing size cap on foodstore development is judged to represent an acceptable balance between the competing requirements of different interest groups. It has also been found not to reduce competition at the level of 3,000 square metres. It is appropriate, therefore, to continue with the principle of the floorspace cap on all foodstore development.
50. There are good reasons to differentiate the floorspace cap between the Greater Dublin Area and the remainder of the State, however. The greater size and density of population in the Greater Dublin Area, the close proximity of residential areas to established town centres and the size of populations contained within the catchment areas of retail centres in the Greater Dublin Area provide a justification for increasing the size limit on foodstore development in this area. Broadly speaking, foodstores in the Greater Dublin Area are likely to be able to command an enhanced turnover generated by the local catchment area. Reflecting this fact and the need to meet the rapidly growing retail requirements of Dublin the size cap on sales floorspace within the Greater Dublin Area is set at 3,500 square metres. In the remainder of the State the floorspace cap on foodstore development is set at 3,000 square metres.

51. These floorspace caps should apply to new development or extensions to existing schemes which will result in an aggregate increase in sales floorspace. This limit should apply to the total net retail sales space of superstores and the convenience goods net retail sales space of hypermarkets delineated on application drawings.
52. County Councils and City Councils in preparing retail development strategies for their areas should be mindful of these floorspace limits on foodstore development. In very exceptional circumstances County Councils outside the Greater Dublin Area and the other four City Council areas could introduce a small downward revision to the floorspace cap in appropriate circumstances where the size of existing town centres is small in relation to the scale of the cap, and the potential for convenience goods expenditure growth is limited. However, if a planning authority wishes to propose a small downward revision to the floorspace cap the justification should be fully substantiated by an expert study and account should be given to the conclusions of the Goodbody Report regarding the need to avoid actions which would contravene competition legislation. Furthermore, account should be taken of the conclusions of the Goodbody Report regarding the scale of development at which economies of scale are exhausted, i.e. available evidence suggests that economies of scale for foodstores are exhausted at a store size of approximately 2,000 square metres. Any reduced floorspace cap should not breach this limit.

Timescales and Requirements for Liaison
53. Planning authorities (except in the Greater Dublin Area) were given 12 months from the date of publication of the guidelines published in 2000 to commence preparation of the necessary retail policies and proposals for their areas. These were to be published and incorporated into the relevant development plans within 18 months from the date of publication of the

original guidelines. In the Greater Dublin Area there was an urgent need to put in place a comprehensive and detailed retail planning strategy. The planning authorities in the Greater Dublin Area have prepared a retail planning strategy together with accompanying policies. These were to be published and incorporated into the relevant development plans within 12 months from the date of publication of the 2000 guidelines.

54. In preparing retail planning strategies and policies (both detailed and general strategies) county councils should liaise closely with the appropriate town councils. Unless these smaller authorities have faith in the strategy and accompanying policies they will be less likely to implement policies in exercising their development control functions.

Assessing New Developments – General Principles

Development Plan Policies

55. Development plans should provide an indication of the general scale and form of retail development that is required in the future and this will constitute the context for making decisions on planning applications. As far as possible new development is to be sited within town centres or, if no sites are available, immediately on the edge of town centres with a presumption against development elsewhere, except where district or neighbourhood centres are being provided to meet neighbourhood needs. A full appraisal of the retail development potential of sites both in the town centre and on the edge of town centres should be undertaken. It will be necessary to consider availability and the underlying realism of possible development formats through general discussions with landowners, retailers and developers. New development should be capable of being accessed by a variety of transport modes without causing undue congestion. In the development plan context the

demonstration of congestion arising from car usage should not be used as an argument against town centre development locations, where adequate public transport exists or could be provided, or where measures to alleviate congestion can be provided.

56. In framing planning policies for specified main town centres county councils should seek to ensure that appropriate servicing arrangements can be provided which do not detract from the environmental quality of town centres nor cause additional congestion. The scale and form of new development should complement rather than detract from existing retail facilities and direct, attractive pedestrian links should be provided between new developments, the existing central area and both public transport facilities and car parks.
57. The intention of these guidelines is that development plans should provide the background guidance and context against which the retail sector and developers can prepare proposals with a degree of certainty as to the way in which any particular scheme will be judged. Where an application for development complies with the policies and proposals of a development plan in all material respects it should not be necessary for the applicant to provide additional supporting background studies. However, the onus is on an applicant to demonstrate convincingly that his/her proposal does comply closely with the development plan. Where there is doubt on any aspect of a planning application local authorities should require a detailed justification related to the matter which is questionable. All applications for retail development should be assessed against the principles set out in this section of the Guidelines.

Location of Development

58. The preferred location for new retail development where practicable and viable, is within a town centre (or district or major village centre). Where it is not possible to provide the form and scale of development that is

required on a site within the town centre then consideration can be given to a site on the edge of the town centre so as to encourage the possibility of one journey serving several purposes. An edge of centre site, for the purposes of these guidelines, is taken to be one which is within an easy and convenient walking distance from the primary shopping core of a town centre. The distance considered to be convenient will vary according to local circumstances but typically is unlikely to be much more than 300-400 metres from the edge of the prime shopping area, and less in smaller settlements.

59. Having assessed the size, availability, accessibility, and feasibility of developing both sites and premises, firstly within a town centre and secondly on the edge of a town centre, alternative out of centre sites should be considered only where it can be demonstrated that there are no town centre or edge of centre sites which are suitable, viable and available. This is commonly known as the sequential approach to the location of retail development.
60. In adopting the sequential approach in formulating development plans planning authorities must liaise with retailers, landowners and developers to ensure that development plan proposals are practicable and reasonable. Unless the development plan has some prospect of being implemented it will not assist in sustaining and enhancing town centres. Sites suggested for development should therefore be capable of being accessed and serviced. They should be viable for the proposed use and likely to become available within a reasonable period of time.
61. Equally, when making planning applications the private sector must be adaptable and flexible in appraising potential sites and buildings and should liaise with the planning authority before submitting assessments of site or building suitability. Retailers should be prepared

to make reasonable compromises and, if possible, adapt standard development formats in order to accommodate retail schemes on sites which are well located in relation to the sequential approach to retail development.

62. A particular issue that will arise in the appraisal of alternative locations is the potentially contrasting performance in terms of urban design, accessibility and traffic congestion. Each case will have to be treated on its merits and a balance struck between a site's relative performance against the various planning and transportation factors to be evaluated. In relation to urban design, applicants should make every effort to integrate successfully new retail development, much of which will be of a scale larger than the existing urban grain, into the townscape of existing centres. Attention should be given to the location of service yards and treatment of car parking areas so as to avoid unsightly views and special consideration should be given to the detailing of extensive frontages and flank walls.
63. It is likely that some retail development will take place in out of centre locations. Not all centres, particularly small and historic towns, will have sites that are suitable in terms of size, parking, traffic generation or servicing arrangements for large-scale developments in the town centre itself. In such centres, development should be of a scale appropriate to the size of the centre in order to minimise the potential for adverse impact. In preparing development plans, county councils should specify criteria against which the merits of out of centre retail applications can be judged. These criteria should cover matters such as the nature and size of retail formats for which out of centre locations may be considered, the broad need (floorspace requirement) for additional retail development to serve an identified local community, size of development, quality of design and layout, effect on the nearby environment, effect on vitality and viability, servicing, accessibility by a variety

of travel modes and car parking. Developers when submitting planning applications should formulate their proposals within the framework of the specified criteria. It is not appropriate for applications on out of centre sites to be pursued when there is quite clearly no need for the scale of development proposed.

Impact On Vitality and Viability

64. New developments can have an adverse impact on the vitality and viability of established town centres. This is a consequence of the competitive environment in which retailing operates. Though it is not the purpose of the planning system to prevent competition, proper planning and development includes promoting healthy town centres, in the public interest. Where new developments compromise this planning goal, they should be rejected.
65. In making an application for planning permission for retail development which local authorities consider to be large scale in relation to existing town centres, the onus is on the applicant to demonstrate compliance with the development plan and that there will not be a material adverse impact on the vitality and viability of any existing town centre. In submitting evidence in relation to retail impact the applicant shall address the following criteria and demonstrate whether or not the proposal would:
- Support the long term strategy for town centres as established in the development plan and not materially diminish the prospect of attracting private sector investment into one or more town centres.
 - Cause an adverse impact on one or more town centres, either singly or cumulatively with recent developments or other outstanding planning permissions, sufficient to undermine the quality of the centre or its role in the economic and social life of the community.
 - Diminish the range of activities and services that a town centre can support.

- Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term.
- 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.
- Link effectively with an existing town centre so that there is likely to be commercial synergy.

Furthermore, in relation to large-scale out of town retail developments, the developer shall submit a transport assessment³ showing how trips to and from the proposed development might affect the road network and public transport links. If the proposed development warrants an environmental impact assessment, the transport assessment should form part of the EIS.

The Greater Dublin Area

66. As previously indicated, a joint retail study was undertaken by the planning authorities in the Greater Dublin Area. This study took account of the following factors:
- The quantum of retail development to be provided in Dublin is much greater than any other area of the State.
 - The transport network will not support all future retail development being provided within the City Centre, and given the size of Dublin not all retail development should be provided within the City Centre.
 - There is an urgent requirement to ensure close working and liaison between planning authorities within the Greater Dublin Area.

³ See "Traffic Management Guidelines Manual" published jointly by the Department of the Environment, Heritage and Local Government, the Department of Transport, and the Dublin Transportation Office.

Assessing New Developments – Specialist Types of Development

67. The general principles for assessing all new development are set out above. The weight to be given to certain criteria may vary with certain specialist types of development. This section of the Guidelines deals with specific retail and leisure development concepts.

Regional Shopping Centres

68. Self-standing, large scale, retail malls developed in out-of-centre locations can have a significant impact on established town centres. Elsewhere in Europe they have been justified on the basis of substantial growth in consumer spending generated within major conurbations of a million people or more. In the Irish context this form of development can not be easily substantiated, with the possible exception of within Greater Dublin. Consequently, outside Dublin, there is no justification in any circumstances for large scale regional shopping centres.
69. Within the Dublin area there are two large scale shopping centres which have been planned as the commercial centre of new towns – Blanchardstown and Tallaght. A third centre, at Liffey Valley, provides comparison shopping only. The Strategic Planning Guidelines for the Greater Dublin Area suggested that the future provision of retailing should incorporate:
- A wide distribution of reasonably sized convenience goods outlets at locations accessible by car, with priority given to places also served by good public transport.
 - A set of established and developing centres well served by public transport, which together with the City Centre, would offer a good provision of comparison goods.
 - A limited number of retail warehouse developments at locations accessible by car.

70. The development of additional large regional scale retail centres on greenfield sites or outside established centres is not regarded as sustainable in relation to transport objectives. Consequently, there should be a general presumption against large scale out-of-centre retail development.

District Centres

71. Purpose built district shopping centres are normally provided within the built up area of major conurbations or in the suburbs of large towns. They are usually anchored by a large foodstore and contain a range of unit shops and non-retail service outlets (such as banks, post office or hairdressers). They perform an important retail function for the local community living within a 15-20 minute drive time of the site. There is no clear size threshold for a district centre although, depending on the density of population in the catchment area, they are likely to comprise about 10,000 square metres in or adjacent to the main towns and up to 20,000 square metres within some parts of Dublin.
72. Development plans will identify the need for new district centres or extensions of existing centres. Normally, the provision of additional centres will be based on major growth in population or a clear proven level of existing underprovision. The Greater Dublin Area represents the area where population is growing fastest and where there is likely to be underprovision of retail facilities at present. Broad criteria for the location of such centres will be indicated in emerging regional plans. Although district centres can be provided as extensions of existing local shopping centres or village centres there may be a requirement to develop planned new centres to serve major new residential areas. Development plans should address the locational requirements of district centres.

Large Foodstores

73. Large foodstores comprising supermarkets, superstores or hypermarkets are an accepted component of the retail hierarchy. They serve mainly the large weekly convenience goods shopping requirements of families. They require large clear areas of floorspace together with adjacent car parking as the majority (but not all) of families undertake their weekly bulk convenience shopping by car.
74. Wherever possible large foodstores should be provided in a town, major village or district centre or on the edge of the centre where public transport provision can be made available for shoppers who do not have the use of a car. In exceptional cases it will not be possible to bring forward sites which are in or on the edge of a town centre because of the site size requirements of large foodstores, environmental constraints in historic towns or because the road network does not have the capacity for additional traffic and service vehicles.
75. Where a proposal for foodstore development involves the sale of a significant amount of non-food goods (as is common in hypermarkets) the application drawings accompanying a planning application should delineate clearly the area to be devoted primarily for the sale of convenience goods. As previously indicated at paragraph 50 a floorspace cap of 3,500 square metres is to be applied in the Greater Dublin Area and 3,000 square metres elsewhere in the State. This cap will apply to the total net retail sales space of superstores and the convenience goods net retail sales space of hypermarkets delineated on application drawings.

Discount Food Stores

76. Smaller discount food stores of up to 1,500 square metres gross have a potential role in extending the choice and range of retailing, particularly for certain sectors of the community. Their customer catchment and retail offer is different to the mainstream

superstores and supermarkets and their trade draw will be different; this will be relevant when assessing impact, although the effect on neighbourhood centres and other shops should also be considered. Discount foodstores can effectively anchor smaller centres or local neighbourhood centres. Proposals should be considered in relation to the development plan and the provisions of paragraph 65 of these guidelines. Re-use of existing non-retail and vacant premises in existing centres should be encouraged unless there is clear evidence to suggest that there would be a significant impact on the viability of smaller centres, due to the size of the discount store.

Retail Parks and Retail Warehouses

77. Retail parks have emerged as agglomerations of retail warehouses grouped around a common car park selling mainly bulky household goods. Retail warehouses require extensive areas of showroom space, often with minimal storage requirements. A substantial proportion of customers drive away with goods purchased in the boot of their car, on a roof rack, or in a van. In some instances retail warehouse operators are able to arrange home delivery.
78. In general retail warehouses do not fit easily into town centres given their size requirements and the need for good car parking facilities and ease of servicing. In some instances it may be possible to locate retail warehouse groups on the edge of town centres.
79. Experience elsewhere in Europe suggests that there are benefits to be gained in grouping retail warehouses selling bulky goods on planned retail parks so that number of trips by car are minimised and outside the town centre so that there is relief from additional traffic within a congested town centre. Generally speaking, the evidence is that planned retail parks do not have any material impact on town centres provided that the range of goods sold is limited to truly bulky household

goods or goods generally sold in bulk. Where the range of goods sold from retail warehouse parks extends to the type of non-bulky durables which is retailed from town centres then there is much more potential for an adverse impact on a nearby town centre.

80. Planning authorities when considering applications for non-food retail parks need to consider the impact on existing town centres. If the range of goods sold is conditioned only to the sale of bulky household goods, including carpets, furniture, automotive products and white electrical goods and DIY items then it is unlikely that a retail park development in the range 8,000 – 15,000 square metres would have a material adverse impact on the more important town centres in the retail hierarchy, although at this scale there could be the potential for an adverse impact on the smaller town centres. If the range of goods extends beyond these bulky goods categories or the size of the proposed retail park significantly exceeds this size range, then local authorities will need to consider the impact of the proposal in relation to the criteria set out at paragraph 65 of these guidelines. If there are, or have been, a number of similar applications in a short space of time (say three years), in the same area, then a planning authority should require applicants to provide an assessment of the cumulative impact of more than one retail park proposal.
81. Specific planning and competition issues arise in relation to the size range of **individual** retail warehouse units. It is necessary to address the separate matters of minimum and maximum unit sizes. Generally speaking smaller units of much less than 700m² gross floorspace are more easily capable of being accommodated in town centres and, in any event, tend to sell a less bulky range of goods. Consequently, local authorities may consider it appropriate to impose a minimum size condition preventing the construction or subdivision of units into stores less than 700m² in out of centre locations.

82. Conversely, the development of very large single retail warehouse units greatly in excess of 5,000 square metres (and sometimes of 10,000 square metres or more) focused upon a specific market segment, can have an unacceptable local monopoly effect on smaller shops in town centres, particularly in a country like Ireland which has no very large conurbations. Furthermore, these large scale development formats attract large volumes of car borne customers and require a high quality road network with spare capacity. These conditions occur at present in relatively few locations in the State. For the foreseeable future, therefore, large scale single retail warehouse units in excess of 6,000 square metres gross (including any ancillary garden centre) are unlikely to be acceptable in many locations due to their effect on the surrounding road network and their potential for creating local monopolies which would inhibit competition within local catchment areas.
83. Where it is considered warranted, local authorities should impose appropriate conditions to prevent the provision of single large units either through new development, coalescence or the linking together of two or more stores. In general, coalescence or linking together of stores would be considered to be development and therefore subject to a requirement for planning permission. The 6,000 square metre threshold should apply in all cases, except where the provisions of paragraphs 84a – 84e below apply.
84. Applications for individual retail warehouses outside a town centre or on its edge should generally be discouraged in order to reduce the number of car journeys. Furthermore, given their potential for visual impact, close attention should be given to the implementation of siting free-standing retail warehouses along major road corridors, in order that a good quality of design can be achieved.

Non-application of Retail Warehouse Cap in certain areas covered by Integrated Area Plans under the Urban Renewal Act, 1998

- 84a. There is evidence of consumer demand in Ireland for innovative types of large-scale retail warehouses which are capable of displaying a very wide range of goods under one roof, together with a range of customer facilities. The scale of such outlets requires a regional, if not a national, population catchment. As stated in paragraph 23, it is not the purpose of the planning system to inhibit competition, preserve existing commercial interests, or prevent innovation.
- 84b. An Integrated Area Plan (IAP) in the context of the 1998 urban renewal scheme is intended to address the physical, economic, social/employment and environmental regeneration of a declining area. IAP areas are identified as those urban areas which have the greatest need of, and potential for, rejuvenation. IAP areas generally are areas in cities and large towns with strong urban characteristics where the greatest concentrations of physical decay and social/economic disadvantage tend to occur. IAP areas are required to contain sites or key developments with the potential infrastructure to cope with likely developments. Many of these urban renewal areas, particularly in the cities, are located in areas suffering from both youth and long-term unemployment. The IAP process aims to give such local people a stake in the rejuvenation of their areas, by focusing on community attainment and sustainable job creation. The targeting of new forms of retail development into such areas would provide a valuable source of employment for such areas.
- 84c. Accordingly, taking account of the submissions received in response to the consultation process initiated in August 2000, the Minister has determined that the 6,000 square metre floorspace cap on individual retail warehouses will not apply in those areas which are the

subject of Integrated Area Plans (IAPs) under the Urban Renewal Act, 1998 in National Spatial Strategy (NSS) Gateways (i.e. within the functional areas of Dublin City Council, Fingal County Council, South Dublin County Council, Dun Laoghaire-Rathdown County Council, Cork City Council, Galway City Council, Limerick City Council, Waterford City Council and in the towns of Dundalk, Letterkenny, Shannon and Sligo and the linked Gateway of Athlone/Mullingar/Tullamore). This will meet two policy objectives. Firstly, it should enable new operators to enter the Irish retail market (or existing operators to potentially operate larger formats in such areas) thereby contributing to the fostering of competition in the retail market. Secondly, it will contribute to urban renewal in those areas covered by Integrated Area Plans in the nine National Spatial Strategy Gateways. These are areas which have been specifically targeted for urban regeneration efforts.

- 84d. However, it should be noted that normal planning rules will continue to apply in such areas. Any proposal for an individual retail warehouse with a floorspace in excess of 6,000 square metres gross in an area subject to an Integrated Area Plan, in order to be acceptable from a planning viewpoint would need to demonstrate that the proposal will:
- (a) Be located close to a road network with sufficient capacity to cater for development of the scale proposed. In practice, larger scale developments would have to be located close to a high capacity motorway or dual carriage-way network and associated interchange;
 - (b) Be served by existing or planned public transport services;
 - (c) Make adequate provision for those opting for home delivery of goods other than by private car;

- (d) Be accompanied by a traffic impact assessment demonstrating compliance with the above criteria; and
 - (e) Take account of the vitality / viability criteria in respect of city / town centres set out at para. 65 of these guidelines.
- 84e. Taking the foregoing paragraphs together, it will be a matter for the development management process to apply the criteria in paragraph 84d above to any proposal that may come forward from the private sector.

Factory Outlet Centres

85. At its simplest, this form of retailing involves the selling of products at discount prices in an individual factory shop usually located as part of or adjacent to the production facility. Such shops, which are an ancillary use to the main manufacturing activity, are not an established part of the retail scene in Ireland, though examples of tourism related outlets for craft products (e.g. crystal) may be found. Proposals for individual factory shops may be appropriate, provided the scale of the shop does not affect the viability of nearby town centres or raise significant traffic and transport issues.
86. The concept of factory outlet centres originated in the United States. During the 1990s purpose built factory outlet centres have been developed in Europe, remote from manufacturing facilities. These include a grouping of factory outlets and other shops, focusing mainly on branded fashion and other specialist goods and generally in out-of-centre locations. Initially devised as a means of disposing of seconds or surplus stock at the end of the season, they can become a mechanism for manufacturers to sell current products direct to the customer if appropriate controls are not exercised. Unless the sale of goods can be regarded as a use incidental to the manufacturing process, such outlets should be treated as normal retail developments and assessed accordingly.

87. The success of these centres depends on drawing customers and visitors from a wide catchment area, including tourists, and there may be implications for existing tourist centres and established town centres, even those some distance from the proposal. In particular, they can lead to the diversion of expenditure on comparison shopping, particularly fashion and specialist goods which forms a key component of town centre turnover. Conversely, if a factory outlet centre is located so that it links well with an established tourist centre or town centre and thus achieve commercial synergy it can assist in raising the profile of a town and enhancing aggregate town centre turnover on retail goods and leisure activities.
88. The relatively small population of Ireland suggests that there is market potential for only a limited number of factory outlet centres. Applications for the development of factory outlet centres should be considered in relation to the provisions of the development plan and paragraph 65 of these guidelines. Because of the potential economic benefits to town centres which can arise from the close proximity of factory outlet centres and established town centres, particular attention should be given to the location of factory outlet centres on the edge-of-town centres or where a short, high quality public transport link can be provided. It should be recognised, however, that factory outlet centres are unlikely to succeed commercially in close proximity to the main town centres in Ireland because retailers do not normally choose to trade at a large discount in direct competition with their high street outlets. However, experience shows that this constraint is unlikely to arise with smaller or secondary town centres, especially those in areas which attract large numbers of tourists. Consequently, the most appropriate location for factory outlet centres is likely to be where commercial synergy

can be achieved between an outlet centre and a town centre which would lead to economic benefits for the local area. It is not considered that factory outlet centres would be appropriate for greenfield out-of-town locations.

Retail Warehouse Clubs

89. Retail warehouse clubs or discount clubs combine elements of cash and carry wholesaling with sales to qualifying members of the public. This balance may vary according to the operator. Despite restrictions on those who may shop in them or the range of goods that can be sold, these outlets often share many of the characteristics of very large retail outlets, in which case they should be treated for the purpose of this guidance as if they were retail businesses and subject to the policy provisions of the development plan and the requirements set out in paragraph 65.

Shops in Small Towns and Rural Areas

90. Small towns and villages are now less self sufficient than 20 or 30 years ago. One result of this has been an increasing dependence on larger settlements for the provision of goods and services as well as for employment. Over time, smaller towns have lost many of the functions previously found within them - including retail functions. This process is cumulative. The closure of a single outlet may represent a general decline in local businesses in rural areas. Local economic self-sufficiency is weakened by this process and it forces those living in rural areas to rely increasingly on urban centres for goods and services⁴. The overall policy response in relation to these trends and the broad thrust of rural development policy is set out in the Government's White Paper on Rural Development entitled *Ensuring the Future - A Strategy for*

⁴ NESG New Approaches to Rural Development No. 97, November 1994

Rural Development in Ireland published in August, 1999. The policy set out in the White Paper was taken into account in the preparation of the National Spatial Strategy.

91. Existing foodstores and supermarkets often play a vital role in maintaining the quality and range of shopping in smaller rural town centres and assist in anchoring the surrounding rural economy, particularly in less densely settled areas of the State. Planning policies should be supportive of local facilities in small towns and villages which provide an effective and valuable service to the local community. Such centres should continue to provide not only for food, but also some comparison shopping and should be the preferred location, especially for food stores. Where rural town centres are not serving the community well, and there is a significant amount of travel by car to other larger centres, then proposals for new retail developments should be encouraged in or near the town centre, in order to reduce travel and retain trade in the town.
92. In small towns and villages there is therefore a clear presumption in favour of central or edge of centre locations for new developments. As elsewhere, out-of-centre retail developments should not be allowed if their provision is likely to lead to a reduction in the range of local facilities in towns and villages or affect the diversity of shops or lead to the loss of general food retailing from the centre of smaller towns. The scope for superstores and other large scale retail developments is likely to be more limited in smaller rural towns than elsewhere. Where appropriate, development plans should indicate the maximum size of store, consistent with maintaining a variety of shops in the centre and protecting rural retail provision. In framing development plan policies on this issue, planning authorities should bear in mind the need to avoid taking any actions which would have an adverse impact on competition in the retail market.

Village Shops

93. The village shop plays a vital economic and social role in rural areas and is important for essential day-to-day needs, particularly for the elderly, disabled and those with no access to a car or poorly served by public transport. Its loss can have an impact on the community. The implications for village shops should therefore be addressed when planning authorities are assessing new retail development proposals in nearby towns.
94. Retailing should generally be directed to existing settlements and development in the countryside should be resisted. Exceptionally, retail facilities outside the development limits of settlements and beyond green belts could be acceptable in the following circumstances:
- A shop which is ancillary to activities arising from farm diversification.
 - A shop designed to serve tourist or recreational facilities, and secondary to the main use.
 - A small scale shop attached to an existing or approved craft workshop retailing the product direct to the public.
 - A small scale shop designed to serve a dispersed rural community.

Local Shops

95. Local shops located in local centres or neighbourhood centres perform an important function in urban areas. They can provide a valued service, catering particularly for the daily or casual needs of nearby residents or of those passing by. Local shops encompassing both foodstores and important non-food outlets such as pharmacies have significant social and economic functions; they offer a particularly important service for those who are less mobile, especially elderly and disabled people, families with small children, and those without access to a car. For example, in peripheral housing estates they may provide the only readily

accessible shopping facilities. Where a planning authority can substantiate clearly the local importance of such shops in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning.

Petrol Filling Stations

96. Petrol filling stations can provide a wide range of retail goods in an associated shop. In rural areas, some function as the local shop or small supermarket. Whilst the important role of such provision is recognised, such shops should, in general, remain secondary to the use as a petrol filling station. The size of shop associated with any petrol filling station should take account of the following factors. Firstly large stores tend to attract additional custom. This can lead to additional car borne trips primarily for shopping purposes. Secondly, large numbers of parked cars in station forecourts can cause disruption and queuing for those simply wishing to use the petrol pumps. Thirdly, the preferred location for retailing is in town centres, not an isolated site outside these preferred locations (sequential approach).
97. Notwithstanding the sequential approach, a shop of up to 100 square metres of net retail sales area may be allowed when associated with a petrol filling station. Where retail space in excess of 100 square metres of net retail sales area associated with petrol filling facilities is sought the sequential approach to retail development will apply, i.e. the retail element of the development should be assessed by the planning authority in the same way as would an application for retail development (without petrol filling facilities) in the same location. In considering applications for development, attention should also be given to the safety aspects of circulation and parking within the station forecourt.
98. Petrol filling facilities ancillary to large foodstores located in or adjacent to town centres often provide

healthy competition in this sector of the market without adversely affecting town centres. It is not axiomatic, however, that all large foodstore formats should have ancillary petrol filling facilities, particularly where the objective of planning policy is, wherever possible, to fit foodstores on sites within or on the edge of town centres. It will often be difficult to find a site in this type of location with acceptable road access which is sufficiently large to allow both a full sized store and a petrol filling station. Consequently retailers should not seek to claim that they are unable to assemble sites within a town centre or on the edge of one, simply because they face difficulty in assembling a site capable of accommodating a large foodstore and a petrol filling station.

Application of Floorspace Caps

99. As indicated at paragraph 53 it was intended that planning authorities outside the Greater Dublin Area would incorporate retail policies and proposals in a development plan within 18 months of the publication of the guidelines published in 2000. Within the Greater Dublin Area, this period was shortened to 12 months given the urgency of the position. Until retail policies and proposals in line with the recommendations of these guidelines have been incorporated into development plans by planning authorities, the floorspace caps/thresholds specified in these guidelines in the Section of the guidelines entitled "Assessing New Developments – Specialist Types of Development" should be applied by planning authorities, i.e. planning permission should not be granted for any new developments which contravene the floorspace thresholds recommended in these guidelines. Planning permission should also not be granted for any change of use which would result in a retail outlet contravening the floorspace caps/thresholds recommended in these guidelines.

Annex 1:

Glossary of Terms

This glossary covers forms of retail development and types of retail location. Because retailing is dynamic, it should be noted that new forms of retailing may evolve which are inadequately described by current terminology.

Types of Retail Floorspace

Total mall floorspace – internal area (measured from inside walls) of a covered mall including gross retail area, floorspace devoted to incidental activities, entrance space centre administrative office, toilets, lifts and escalators and walkways.

Net lettable retail area – total floorspace (measured from inside the shop walls) which is let to a retailer.

Gross retail area – this is the net lettable area – i.e. sales space, plus storage space, offices, toilets, canteen and circulation space.

Net retail sales area – the area of a shop or store which is devoted to the sales of retail goods (including the area devoted to checkouts).

Types of Retail Goods

Although there is a trend for "scrambled merchandising" whereby some retail businesses sell both convenience goods and comparison goods, greater definitional clarity is obtained by adopting a **goods** based retail classification. Retail goods categories are defined by reference to the National Income and Expenditure Accounts and can be divided into convenience goods and comparison goods as follows:

- Convenience - food
 - alcoholic and non-alcoholic beverages
 - tobacco
 - non-durable household goods

- Comparison - clothing and footwear
 - furniture, furnishings and household equipment (excluding non-durable household goods)
 - medical and pharmaceutical products, therapeutic appliances and equipment
 - educational and recreation equipment and accessories
 - books, newspapers and magazines
 - goods for personal care and goods not elsewhere classified

The value of repairs is excluded in all cases.

- Bulky goods - Goods generally sold from retail warehouses where DIY goods or goods such as flatpack furniture are of such a size that they would normally be taken away by car and not be manageable by customers travelling by foot, cycle or bus, or that large floor areas would be required to display them e.g. furniture in room sets, or not large individually, but part of a collective purchase which would be bulky e.g. wallpaper, paint.

Types of Convenience Good Shopping

Discount food store – single level, self service store normally of between 1000 – 1500 square metres of gross floorspace selling a limited range of goods at competitive prices, often with adjacent car parking.

Supermarkets – Single level, self-service stores selling mainly food, with a net sales area of less than 2,500 square metres, often with adjacent car parking.

Superstores – Single level, self-service stores selling mainly food, or food and some non-food goods, usually with at least 2,500 square metres net sales floorspace with dedicated surface level car parking.

Hypermarket – Single level, self service stores selling both food and a range of comparison goods, with net sales floorspace in excess of 5,000 square metres with dedicated surface level car parking.

Convenience Outlet – Single level, partially self service store with no adjacent car parking, selling food and other convenience items, with a net sales area of not more than 500 square metres, and a product range less than that carried by a supermarket. Such stores are characterised by longer opening hours than supermarkets.

Types of Comparison Goods Shopping

Retail mall – Purpose built centres (either in-centre or out-of-centre) incorporating a mix of larger stores and individual shops usually concentrating on comparison goods, together with some convenience shopping and sometimes commercial leisure and/or a food court.

Regional shopping centres – Out-of-town retail malls generally of 50,000 square metres gross retail floorspace or more, typically enclosing a wide range of clothing and other comparison goods with extensive dedicated car parking. Regional shopping centres do not normally incorporate retail warehouses.

Retail parks – A single development of a least three retail warehouses with associated car parking.

Retail warehouse – A large single-level store specialising in the sale of bulky household goods such as carpets, furniture and electrical goods, and bulky DIY items, catering mainly for car-borne customers and often in out-of-centre locations.

Warehouse clubs – Generally out-of-centre retailers specialising in bulk sales of reduced price, quality goods in unsophisticated buildings with dedicated car parks. The operator may limit access to businesses, organisations or classes of individual, through membership restrictions.

Factory shop – A shop adjacent to the production unit and specialising in the sale of manufacturers' products direct to the public.

Factory outlet centres – Group of shops, usually in out-of-centre locations, specialising in selling seconds and end-of-line goods at discounted prices.

Types of Centre

Town centre – In this guideline, the term "town centre" is used to cover city, town and district centres which provide a broad range of facilities and services and which fulfil a function as a focus for both the community and public transport. It excludes retail parks, local centres and small parades of shops of purely local significance.

District centre – Either a traditional or purpose built group of shops, separate from the town centre and either located within the built-up urban area or in a suburban location on the edge of an urban area, usually containing at least one food supermarket or superstore and non-retail services, such as banks, building societies and restaurants.

Local centre or neighbourhood centre – Small groups of shops, typically comprising a newsagent, small supermarket/general

grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population.

Types of Location

Retail area – That part of a town centre which is primarily devoted to shopping.

Prime pitch – That part of the retail area of a town centre or retail mall where pedestrian flows are greatest, competition for representation is greatest and rents are noticeably higher than elsewhere.

Edge-of-centre – A location within easy walking distance (usually not more than 300 to 400 metres) of the primary retail area of a town centre, and providing parking facilities that serve the centre as well as the new development thus enabling one trip to serve several purposes.

Out-of-centre – A location that is clearly separate from a town centre but within the urban area, including programmed extensions to the urban area in approved or adopted development plans.

Out-of-town – An out-of-centre development on a green field site, or on land not clearly within the current urban boundary.

Annex 2: Assessing the Vitality and Viability of Town Centres

1. The concept of vitality and viability is central to maintaining and enhancing town centres. It will depend on many factors, including the range and quality of activities in a centre, its mix of uses, its accessibility to people living and working in the area and its general amenity, appearance and safety. A healthy town centre which is vital and viable balances a number of qualities:
 - **Attractions** – these underpin a town and comprise the range and diversity of shopping and other activities which draw in customers and visitors.
 - **Accessibility** – successful centres need both to be accessible to the surrounding catchment area via a good road network and public transport facilities, and to encompass good local linkages between car parks, public transport stops and the various attractions within the centre.
 - **Amenity** – a healthy town centre should be a pleasant place to be in. It should be attractive in terms of environmental quality and urban design, safe, and it should have a distinct identity or image.
 - **Action** – to function effectively as a viable commercial centre things need to happen. Development and improvement projects should be implemented efficiently; there should be regular and effective cleaning and maintenance and there should be co-ordinated town centre management initiatives to promote the continued improvement of the centre.

2. Although no single indicator on its own can measure the performance of a town in relation to these four elements of all round "health" it is possible to gain a good appreciation by undertaking a health check assessment using a variety of indicators. This provides a consistent framework for assessing vitality and viability. In this way the strengths and weaknesses of town centres can be analysed systematically and planning authorities will be able to ascertain how well centres are performing in terms of their attraction, accessibility, amenity and action programmes. Such health checks should both inform and be undertaken within the framework provided by the development plan. Local authorities, in keeping their area under review, should collect information on key town centre uses, including sites which may be suitable and may become available for retail and other non retail uses, with or without rehabilitation or redevelopment.

3. The most appropriate health check indicators are summarised below:
 - (i) Diversity of uses: how much space is in use for different functions – such as offices, shopping, other commercial, leisure, cultural and entertainment activities, pubs, cafes and restaurants, hotels, educational uses, housing – and how has that balance been changing?

 - (ii) Retailer representation and intentions to change representations: it may be helpful to look at the existence and changes in representation, including street markets, over the past few years, and at the demand from retailers wanting to come into the town, or to contract or close their representation.

 - (iii) Shopping rents: pattern of movement in retail rents within primary shopping areas.

- (iv) Proportion of vacant street level property: vacancies can arise even in the strongest town centres, and this indicator must be used with care. Vacancies in secondary frontages and changes to other uses will also be useful indicators.
- (v) Accessibility: the ease and convenience of access by a choice of means of travel, including the quality, quantity and type of car parking, the frequency and quality of public transport services, the range of customer origins served and the quality of provision for pedestrians and cyclists.
- (vi) Environmental quality: this indicator should assess the physical condition of a town (clutter, litter and graffiti) and the environmental attributes (quality of shopfronts, landscaping and open spaces).
- (vii) Customer views and behaviour: regular surveys of customer views will help authorities in monitoring and evaluating the effectiveness of town centre improvement and in setting further priorities. Interviews in the town centre and at home should be used to establish views of both users and non-users of the centre. This could establish the degree of linked trips.
- (viii) Perception of safety and occurrence of crime: this should include views and information on safety and security.
- (ix) Commercial yields on non-domestic property (i.e. the capital value in relation to the expected market rental): this demonstrates the confidence of investors in the long term profitability of the centre for retail, office and other commercial developments. This indicator will normally only

be available for the larger town centres and should be used with care as investor confidence can be influenced by a number of extraneous factors unrelated to a particular centre and for many smaller centres there are in any event only a limited number of investment attractions from which conclusions can be drawn.

- (x) Pedestrian flows: the numbers and movement of people on the streets, in different parts of the centre at different times of the day and evening, who are available for businesses to attract into shops, restaurants or other facilities. To be effective this indicator should be monitored regularly as it is the relative values (rather than absolutes) which are important together with clear evidence of changes over time.
4. These indicators should be collected and monitored regularly for the main centres in the retail hierarchy in order to provide baseline and time-series information on the health of centres and allow comparison between centres. Planning authorities should co-operate with the private sector in collecting data. The indicators will also provide the necessary context for considering the implications of retail impact assessments. In many instances it may be difficult to obtain all the health check indicators, especially for local authorities with limited staff resources. Where priorities on data collection have to be established emphasis should be given to indicators (i)-(vi), especially in the smaller town centres.

Annex 3:

Assessment of Additional Retail and Commercial Leisure Floorspace Requirements

Introduction

1. This Annex provides guidance on the way in which planning authorities should assess the following matters relating to the requirement to assess market demand and the need for additional retail development:
 - Existing retail floorspace.
 - Assessment of demand.
 - Assessment of the need for additional development.
2. The purpose of county planning authorities addressing these factors is firstly to enable the plan preparation process to be properly informed about the quantum and type of development that the market is likely to bring forward. Secondly, in order to plan for the location and scale of additional development, the planning system needs to be informed as to the type of additional floorspace likely to be required in order to meet the projected growth in population and consumer spending.
3. It is the purpose of the planning system to regulate the use of land and the scale of development in the common good. To achieve this in relation to retail development, guidance is required which retailers and developers can follow in the development control context. Certainty and clarity will assist the development process. To ensure realism County Councils must consult fully with the private sector when preparing development plan guidelines.

Existing Retail Floorspace

4. The starting point for any assessment of additional requirements is to measure both the health of retail centres in accordance with the principles set out in Annex 2, and to measure the existing quantum of floorspace. The last comprehensive survey of shopping floorspace in Ireland was the 1988 Census of Services. The Government does not propose to repeat a Census of Services and it is necessary for local authorities to update the information on retail floorspace. This can be obtained either by checking the changes in new development and changes of use and demolitions since the 1988 Census of Services using development control data, or by initiating a special retail floorspace survey.

Market Demand

5. A general picture of emerging retailer demand can be obtained from the following sources:
 - Trends in planning applications for different types of retail development.
 - Review of relevant newspapers, journals and periodicals.
 - Consultations with retailers, leisure operators, and property agents.
6. Planning authorities should seek to identify the trends in market demand from these sources so that they can be taken into account when preparing development plans.

Assessment of Need

7. A broad assessment of the requirement for additional retail floorspace can be provided by projecting the future change in population and the growth in consumer spending. Projections of increased spending should seek to identify the change in the value of

spending at constant prices, rather than prices which include the effect of inflation.

8. County councils need to prepare plans for their administrative areas. These may not necessarily reflect the catchment area for the various retail centres within their administrative area boundaries. Consequently it is necessary to establish broadly speaking the real world catchment area for key centres and to make allowances for cross boundary shopping flows either into the county or out of it. In rural areas it is often possible to make estimates of catchment areas in sparsely populated countryside by reference to the relative distance between competing centres and the presence of strong geographical boundaries such as major rivers, estuaries, motorways, railway lines or mountains. In more densely populated areas where there are better road and rail communications and where retail centres compete more strongly with one another in the hierarchy it may be necessary to commission surveys of shopping patterns.
9. Assessments of the change in retail spending which can be expected to be generated within the catchment area of retail centres can provide a useful mechanism for identifying future retail development requirements. The projected growth in retail spending can readily be converted into retail floorspace using appropriate sales density ratios for the different types of retail formats to be provided. The Department of the Environment, Heritage and Local Government will liaise with the CSO to ascertain whether up to date information can be provided on the net retail sales area and turnover of businesses responding to the Annual Inquiry. This will enable trends in sales densities to be monitored. The resulting estimates should be treated as broad planning guideline requirements which can be monitored and adjusted over time in the light of events on the ground and changing market conditions.

Annex 4: The Assessment of Retail Impact

1. It is commonly accepted that there are six main steps to the assessment of retail impact:
 - (i) Identification of catchment or study area.
 - (ii) Estimation of expenditure available within the defined catchment or study area.
 - (iii) Estimation of the turnover of existing centres within the catchment area which are likely to be affected by a new development.
 - (iv) Estimation of the turnover of the new development for which a planning application is being lodged.
 - (v) Estimation of the quantum of consumer retail spending available in the catchment area which will be diverted from existing centres to the new retail development; this assessment normally highlights the diversion of expenditure by zone within the catchment area.
 - (vi) Aggregation of the zonal diversions from each centre to the new development to provide an estimate of trade diversion; trade diversion is then expressed as a proportion of a centre's turnover at the target year to provide a measure of impact.
2. Many of these steps in the assessment of retail impact are relatively straightforward and make use of readily available data. The one matter that is less clear cut in the assessment of impact is step (v) which is where the estimate of trade diversion from each of the centres in

the retail system to the proposed development is made. A variety of approaches can be adopted at this stage of the assessment, some more sophisticated than others. It is not intended to impose a required methodology to this stage of the calculation. It is important for all approaches to be clearly substantiated, however, preferably using up to date information and survey evidence as far as possible. Unsubstantiated judgements and assertions do not assist in providing a clear assessment.

3. Those submitting retail impact studies on behalf of clients, or considering the work of others on behalf of clients should at all times be aware of the need to maintain professional objectivity. The purpose of an impact study is to provide clarity and guidance for decision makers. Clear, well reasoned and impartial submissions should be made which seek to address uncertainty and inform all parties.

Planning Guidelines

Planning Guidelines