

**RESPONSE TO SUBMISSIONS ON  
DRAFT METROPOLITAN CORK JOINT  
RETAIL STUDY AND STRATEGY –  
AUGUST 2013**

## **1.0 Introduction:**

1.1 The following report provides a review of submissions received on the Draft Metropolitan Cork Joint Retail Study and Strategy. The report is split in 3 sections as follows:

Section 1: Introduction and overview of key issues and submissions.

Section 2: Review of Key Issues raised within the submissions.

Section 3: Response to each submission.

Section 4: Response to Cork City Council and Cork County Council Strategic Planning Committee Submissions.

1.2 In total 22 no. submissions were received in respect of the retail study. The submissions are listed below.

### **List of Submissions Received:**

1. Dunnes Stores: Submission by Patrick O Neill, Store Development
2. Tesco (Ireland Ltd.): Submission by Cunnane Stratton Reynolds
3. Aldi Stores (Ireland) Ltd. by Coakley O' Neill
4. Lidl Ireland GmbH – The Planning Partnership
5. Mc Cutcheon Halley Walsh – O' Flynn Construction – Cork County
6. Mc Cutcheon Halley Walsh – O' Flynn Construction – Cork City
7. O' Callaghan Properties – Cunnane Stratton Reynolds:
8. Deka Immobilien Investment GmbH owners of Mahon Point Shopping Centre – prepared by Cunnane Stratton Reynolds
9. Mc Carthy Developments – Roger Tym and Partners
10. Donncha Loftus- McCutcheon Halley Walsh
11. Cork Chamber of Commerce and Business Association
12. Construction Industry Federation:
13. Karl Mc Coy Property Consultant – Carraigdubh Developments Cork Limited t/a Alchemy Properties
14. Joe/ Carey & Millfield Investment Partners - Cunnane Stratton Reynolds
15. Pat O'Donovan, O Donovan Transport- Cunnane Stratton Reynolds
16. William Cuddy - Little Island Business Association
17. Shipton group- Clayton Love
18. McCutcheon Halley Walsh - on behalf of Motor Services Ltd.
19. McCutcheon Halley Walsh- on behalf of O'Brien and O' Flynn
20. Coakley O'Neill - On behalf of Douglas Developments Ltd. in respect of Douglas Court Shopping Centre.
21. Coakley O'Neill - On behalf of Kevin O'Leary Group in respect of lands at South Douglas Road
22. National Roads Authority

1.3 In addition to the above submissions meetings were also undertaken with the Strategic Planning Committees of Cork City Council and Cork Council. A number of points were raised in respect of the draft retail strategy and study and these are addressed in Section 4 of this report.

**Key Issues:**

- 1.4 Section 2 of this report sets out a response to some of the key issues raised within the submissions as follows:
1. Assumed Turnover Ratios/ Sales Densities
  2. ~~Accuracy of Existing Retail Floorspace Figures for Mahon Shopping Centre~~
  - ~~3.~~ **2.** Neighbourhood Centres
  - ~~4.~~ **3.** Inclusion of Measures to address Vacancy Objective
  - ~~5.~~ **4.** Survey Information to be provided as Appendix to Retail Study
  - ~~6.~~ **5.** Ballyvolane
  - ~~7.~~ **6.** Thresholds for requirements for a Retail Impact Statement and Sequential Test Assessment
  - ~~8.~~ **7.** Convenience Floorspace Distribution
  - ~~9.~~ **8.** Core retail areas to be defined for all District Centres
- 1.5 Each submission is considered individually within Section 3 of this report. Section 4 of this report sets out a response to each of the issues raised by Cork City Council and Cork County Council Planning and Development Strategic Planning Committees.
- 1.6 A number of amendments to the retail strategy and study are proposed in response to the submissions made. Throughout the document the proposed additions to the text are bold and underlined and proposed deletions are illustrated with strikethrough.

## 2.0 RESPONSE TO KEY ISSUES

- 2.1 There are a number of key issues raised within the submissions on the Draft Retail Study and Strategy. Centre specific submissions are dealt with in the response to each relevant submission. This section of the report provides a response to these key issues.

### **Key Issue no. 1: Assumed Turnover Ratios/Sales Densities**

#### Summary of Key Issue:

- 2.2 This key issue relates to the convenience sales density assumptions used within the retail strategy and study for existing and future retail floorspace. A number of submissions raise the point that it is not appropriate to use a single sales density turnover ratio for convenience floorspace.

#### Response to Key Issue:

- 2.3 It is noted that the sales density figure of €11,000 is applied to identify the need for future floorspace. This average of €11,000 is based on published industry data and a calculation of the average sales density currently being achieved by existing convenience floorspace within the Metropolitan Area which is estimated at €11,730 (as detailed in paragraph 6.6.1 of the retail study). This is based on detailed expenditure data provided by the CSO on the 2011 census data, the household survey and the floorspace survey. It is therefore based on robust and up to date data. The Draft Study is clear in stating that the average sales density has regard to the different nature of convenience floorspace provided across the catchment area and notes that smaller symbol stores yield a significantly lower turnover per sq.m. than large supermarkets (paragraph 6.6.4). It is both necessary and appropriate to apply an average sales density at a strategic level to calculate the need for additional retail floorspace across the Metropolitan area. This average takes full account of the varying turnover levels of different types, formats and sizes of stores. It assumes that future convenience floorspace will comprise a mix of smaller, medium and large convenience stores broadly similar to the existing mix of convenience retailing types.
- 2.4 The provision of an average sales density figure is an approach which is adopted in various retail strategies throughout the Country. The Retail Strategy for the Greater Dublin Area for example assumes the application of an average sales density of €12,000 per sq.m. for convenience floorspace in 2006 prices and the 2010 Draft Kildare Retail Strategy refers to a sales density of €15,315 in 2006 prices. These figures are €12,705 and €16,215 when they are adjusted for comparison purposes to a 2011 price year as used within the Draft Cork Metropolitan Area Retail Study.
- 2.5 The 2008 Cork Strategic Retail Study refers to a sales density range of €6,130 to €11,740 in 2004 prices (These figures are €6,914 and €13,242 when they are adjusted to a 2011 price year for comparison purposes). Table 6.2 of the 2008 Retail Study sets out the floorspace projections based on an average of the aforementioned sales densities and the study recommends that the average figure is used for planning of future floorspace requirements. This average is €10,078 in 2011 prices. This figure increases to €10,169 when the sales density growth rates of 0.3% per annum for convenience goods expenditure is applied.

- 2.6 In all cases sales densities outlined are averages and in any specific proposal the established approach is to estimate the likely turnover of the proposed retail floorspace having regard to the particular characteristics of the proposal and the retail format proposed. In many instances such as for small scale convenience stores and discount foodstores this will be less than the €11,000 average and in the instance of large scale supermarkets the turnover ratios will be higher. This point will be clarified within the retail strategy in order to avoid any confusion on the matter. It is proposed to include the following paragraph within the retail strategy in this regard:

Recommendation:

Proposed Amendments to Retail Study

- 2.7 Incorporate the following amendment to paragraph 6.6.4 of the Retail Study:

*"It is possible to derive the turnover of existing floorspace within the catchment area by multiplying the floorspace in each category by the average turnover per sq. m. In considering appropriate turnover levels it is important to have regard to the different nature of retail floorspace provided across the Metropolitan Area. While data available for the turnover of retailers in Ireland is limited, it is clear that existing comparison floorspace within the City Centre for example will yield a significantly higher turnover per sq. m. than existing lower order comparison floorspace provided within the smaller metropolitan towns. This is further evidenced by the results of the household survey which illustrate inflows of expenditure to the City Centre from the wider Metropolitan Area. Likewise smaller symbol stores also yield a significantly lower turnover per sq. m. than large supermarkets. For the purposes of this study **an average** turnover of €11,000 per sq. m. is assumed for existing convenience floorspace within the County in 2011 and €7,000 per sq. m. for comparison floorspace. An average turnover of €2,500 per sq. m. is assumed for bulky goods in 2011 prices. **These average figures are based on published industry data and an overview of the average sales density currently being achieved by existing floorspace within the Metropolitan Area which is estimated at €11,730 for convenience floorspace, €7,456 for comparison floorspace and €2,506 for bulky goods floorspace. This is based on detailed expenditure data provided by the CSO the Annual Services Inquiry, the 2011 Census and the household survey and the floorspace survey undertaken to inform the retail study. The aforementioned sales densities are averages applied at a strategic level to calculate the need for additional retail floorspace across the Metropolitan area. In any proposal the established approach is to estimate the likely turnover of the proposed retail floorspace having regard to the particular characteristics of the proposal and the retail format proposed**".*

Proposed Amendments to Retail Strategy

- 2.8 The Retail Strategy does not include specific reference to turnover ratios therefore no change is required.

## **Key Issue no. 2: Neighbourhood Centres**

### Summary of Key Issue:

- 2.9 A number of submissions relate to (1) site specific requests for additional neighbourhood centres within the Metropolitan area over the lifetime of the retail strategy and (2) the requirement for a specific neighbourhood centre policy within the retail strategy. (3) Submissions also relate to the definition of neighbourhood centres within the retail study. In this regard the submissions outline that there is no evidence to support the existing statement within the retail study that these centres serve a 10 minute walking distances and raise concern that this definition would not be interpreted with flexibility in future applications for neighbourhood centres.

### Response to Key Issue:

#### *Point 1: Site Specific Requests for additional neighbourhood centres*

- 2.10 The zoning of additional lands for neighbourhood centre purposes is a matter for the Development Plan/ Local Area Plan pertaining to the area. Specific reference to the requirement for additional neighbourhood centres will be included within the specific policy for neighbourhood centres to be included within the retail study in response to Point 2 as detailed below.

#### *Point 2: Inclusion of a Specific Neighbourhood Centre Policy within Retail Strategy*

- 2.11 It is proposed to include the following specific neighbourhood centre policy within the Retail Strategy.

### **Large Village Centres and Neighbourhood Centres**

**Policy 6: To support, promote and protect Large Village Centres and Neighbourhood Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. The opportunity for development of new neighbourhood or local centres will be identified in Development Plans or Local Area Plans as appropriate including where significant additional population growth is planned or where gaps in existing provision are identified.**

- 2.12 Reference to the requirement for additional neighbourhood centre will also be included within Paragraph 8.6.3 of the Retail Study as follows:

*“The Planning Authorities may need to consider the designation of new neighbourhood centres or expanding existing neighbourhood centres during the preparation of the new Development Plans where significant additional population growth is planned **or where there are gaps identified in the existing provision.** The opportunity for development of new neighbourhood or local centres will be identified in Development Plans or Local Area Plans as appropriate”.*

#### *Point 3: The Definition of Neighbourhood Centres*

- 2.13 The third point raised in respect of neighbourhood centres relates to the existing description of these centres within the retail strategy which currently states that:



*“Neighbourhood centres and larger villages provide important top up and day to day shopping and retail service requirements and play an important role in serving the needs of those without access to a car, particularly the elderly. They are typically characterised by small scale convenience offer and ancillary retail services and serve a catchment area of approximately 10 minutes walking distance.”*

- 2.14 It is recommended that the description of these centres as set out within Paragraph 4.9 of the Retail Strategy is revised as follows:

*“Neighbourhood centres and larger villages provide important top up and day to day shopping and retail service requirements. ~~and play an important role in serving the needs of those without access to a car, particularly the elderly.~~ They are typically characterised by **appropriately small scaled** convenience offer and ancillary retail services and serve a **small, localised catchment population**”*

- 2.15 This change will also be incorporate in paragraph 7.2.18 of the Retail Study.

Recommendation:

Proposed Amendments to the Retail Study in respect of Points 1 and 2

- 2.16 Reference to the requirement for additional neighbourhood centre will also be included within Paragraph 8.6.3 of the Retail Study as follows:

*“The Planning Authorities may need to consider the designation of new neighbourhood centres or expanding existing neighbourhood centres during the preparation of the new Development Plans **or Local Area Plans** where significant additional population growth is planned. **The opportunity for development of new neighbourhood or local centres will be identified in Development Plans or Local Area Plans as appropriate**”.*

Proposed Amendments to Retail Study in respect of Point 3

- 2.17 Revision to Paragraph 7.2.18 as follows:

*Neighbourhood Centres **provide important top up and day to day shopping and retail service requirements** ~~play an important role in serving the needs of those without access to a car, particularly the elderly.~~ They are typically characterised by small scale convenience offer and ancillary retail services. Such developments typically serve a **small, localised catchment population**”*

Proposed Amendments to the Retail Strategy in respect of Points 1 and 2

- 2.18 Points (1) and (2): Include additional policy within the retail strategy which relates to Large Village Centres and Neighbourhood Centres as follows.

**Large Village Centres and Neighbourhood Centres**

**Policy 6: To support, promote and protect Large Village Centres and Neighbourhood Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. The opportunity for development**

**of new neighbourhood or local centres will be identified in Development Plans or Local Area Plans as appropriate.**

Proposed Amendments to Retail Strategy in respect of Point 3

2.19 Point (3) revisions to paragraph 4.9 of the retail strategy as follows:

*“Neighbourhood centres and larger villages provide important top up and day to day shopping and retail service requirements ~~and play an important role in serving the needs of those without access to a car, particularly the elderly.~~ They are typically characterised by **appropriately small-scaled** convenience offer and ancillary retail services and serve a **small, localised catchment population**”*

**Key Issue no. 3: Inclusion of measures to realise Vacancy Objective**

Summary of Key Issue:

2.20 The inclusion of an objective to reduce core retail area vacancy throughout the Metropolitan Area within the retail strategy is supported within a number of the submissions. The submissions request further measures to be set out on how vacancy can be addressed. Recommendations within the submissions refer to flexibility for change of use of existing vacant properties and reconfiguration of existing vacant uses.

Response to Key Issue:

2.21 It is considered appropriate to include additional measures to address vacancy within the retail study. Reconfiguration of existing vacant units and flexibility in consideration of change of uses applications at appropriate locations is supported.

Recommendation: Proposed Amendments to the Retail Study

2.22 It proposed to include the following revision within Section 6.7.11 of the Retail Study:

*“It is an objective of the Study to significantly reduce core retail area (including district centre) retail vacancy levels in the short term by 50% half of which (25%) should be occupied by retail uses and the remaining half occupied by non-retail uses including retail services. It should be noted that this is a minimum requirement and in certain locations a higher percentage may be targeted where particularly high vacancy rates prevail. It should be noted that these targets refer to the City Centre District Centres and Town Centres in the Metropolitan area. **Reconfiguration of existing vacant uses at appropriate locations to meet market demands for appropriate retail developments – either in terms of sub-division or merging of existing units - and a balanced approach to proposed change of use of retail units to either retail services or non-retail uses can help achieve this objective**”.*

Proposed Amendment to the Retail Strategy

2.23 It is proposed to include the following within Paragraph 6.3 of the Retail Strategy

*It is an objective of the Joint Retail Study to significantly reduce retail vacancy levels in the short term by 50% of which half of which should be occupied by retail uses and the remaining 25% occupied by non-retail uses including retail services. Of this 25% retail vacancy figure it*



*is assumed that 2/3's of this floorspace (7,364 sq.m.) will be occupied by comparison floorspace and the remaining 1/3 (3,682 sq.m.) will be occupied by convenience floorspace. **Reconfiguration of existing vacant uses at appropriate locations to meet market demands for appropriate retail developments – either in terms of sub-division or merging of existing units - and a balanced approach to proposed change of use of retail units to either retail services or non-retail uses can help achieve this objective.** This objective has been taken into consideration in determining the potential for additional retail floorspace within the Metropolitan Area.*

#### **Key Issue no. 4: Survey Information to be provided as Appendix to Retail Study**

##### Summary of Key Issue:

- 2.24 A number of submissions require detailed floorspace, vacancy and pipeline floorspace survey information to be included within the retail study.

##### Response to Key Issue:

- 2.25 A breakdown of pipeline floorspace split between each individual settlement is presented in Table 7.3.3 of the retail study. This includes the total quantum of net pipeline floorspace within each settlement and splits it between bulky household, comparison and convenience floorspace. Additional information on the breakdown of pipeline floorspace can be provided as an appendix to the study.
- 2.26 The total amount of vacant floorspace split by settlement is presented in Table 7.3.4 of the Retail Study. The location of these vacant units are illustrated in Appendix 3 of the Retail Study. A summary of the existing quantum, format and location of retail floorspace within the Metropolitan Area is set out within Table 4.2.1 of the retail study. The information presented within the draft retail study in terms of vacancy and floorspace is considered appropriate.
- 2.27 A review of all floorspace survey information presented within the retail strategy and study was undertaken in the preparation of a response to the submissions on the draft retail strategy and study. As part of this review an anomaly was recognised within the existing retail floorspace figures for Douglas District Centre. The existing retail floorspace figures within the draft study are stated as 12,435 sq.m. convenience, 12,255 sq.m. comparison and 2,431 sq.m. bulky goods. However the above figures include retail floorspace, which is located in the Douglas area and outside of the designated district centre for Douglas. This floorspace is more appropriately included within the Cork City suburban neighbourhood centres and Cork City and suburbs retail warehouse floorspace categories. The revised figures for existing floorspace in Douglas are 8,274 sq.m. convenience, 11,694 sq.m. comparison and 2,141 sq.m. bulky floorspace with a balancing change to figures for the cork city suburban neighbourhood centres and retail warehouse floorspace. There is no change in total existing floorspace provision and therefore there are no implications for the overall strategy arising from this point. It is proposed to amend the study and strategy accordingly.**

Recommendation:

Proposed Amendments to the Retail Study

**2.278** Include list and details of pipeline permissions as an Appendix to the retail study. Information presented in the draft study on floorspace and vacancy is considered appropriate.

**2.29** Revisions to Table 4.2.1 and 6.8 of the Retail Study as follows:

Location	Convenience	Comparison	Bulky Household
Cork City	16,201	88,407	6,860
Mahon District Centre & Retail Park	2,969	16,808	13,384
Blackpool DC & Retail Park	4,011	11,198	3,408
Wilton DC	4,022	7,272	0
Ballyvolane DC	4,001	2,011	924
Douglas DC	<b>8,274</b> <del>12,435</del>	<b>11,694</b> <del>12,255</del>	<b>2,141</b> <del>2,431</del>
Cork City Suburban Neighbourhood Centres	<b>16,893</b> <del>12,732</del>	<b>5,477</b> <del>4,916</del>	0
Cork City & Suburbs Retail Warehouse Floorspace	0	79	<b>44,506</b> <del>44,216</del>
Cork City Local Centres	4,471	1,333	1,013
Residual Floorspace within Cork City Council Area	5,686	3,154	1,495
Passage West and Monkstown	1,399	145	0
Blarney	954	3,452	764
Glanmire	2,707	813	175
Carrigtwohill	1,962	1,678	5,029
Carrigaline	6,881	5,352	6,154
Midleton	8,529	9,423	7,407
Cobh	5,408	3,248	1,533
Ballincollig	9,728	11,445	2,784
Little Island	1,167	162	8,917
Other Rural	3,729	824	3,783
<b>Total</b>	<b>108,992</b>	<b>183,975</b>	<b>110,277</b>

**2.30** Revisions to Table 4.2.2 of the Retail Study as follows:

CENTRE	VACANCY AS A PERCENTAGE OF TOTAL NET FLOORSPACE				VACANCY AS A PERCENTAGE OF NUMBER OF UNITS		
	Total Non-Vacant Retail Floorspace (Sq.m Net)	Total Vacant Floorspace (sq.m. net)	Total Floorspace (Occupied & Vacant)	% Vacant (of Total Floorspace)	Total No. of Units	No. of Vacant Units	% Vacancy
<b>City Centre</b>							
City Centre	111,518	33,754	145,272	23.2	758	239	31.5
<b>District Centres</b>							
	6,936	390	7,326	5.3	13	2	15.4
Blackpool	18,419	2,971	21,390	13.9	47	8	17.0
Wilton	11,294	1,005	12,299	8.2	55	9	16.4
Mahon	33,161	1,632	34,793	4.7	54	5	9.3
Douglas	22,109 <sup>27,124</sup>	5,553 <sup>6,014</sup>	27,662 <sup>33,137</sup>	20 <sup>18.1</sup>	122 <sup>143</sup>	33 <sup>37</sup>	27.0 <sup>25.9</sup>
<b>Metropolitan Towns</b>							
Ballincollig	24,011	11,765	35,776	32.9	150	58	38.7
Blarney	5,170	760	5,930	12.8	28	9	32.1
Carrigaline	18,387	1,988	20,375	9.8	74	17	23.0
Carrigtwohill	8,669	1,928	10,597	18.2	37	12	32.4
Cobh	10,189	4,031	14,220	28.3	90	32	35.6
Glanmire	3,695	1,325	5,020	26.4	29	10	34.5
Midleton	25,359	9,399	34,758	27.0	174	43	24.7
Passage West	1,434	810	2,244	36.1	14	8	57.1
<b>Other Areas</b>							
Little Island	10,246	12,096	22,342	54.1	21	9	42.9
<b>Total</b>	315,609	89,864	405,473	22.2	1,687	498	29.5

2.31 Revisions to Paragraphs A5.3.91 and A5.3.116 of the Retail Study as follows:

Amend paragraph A5.3.91 as follows:

There are secondary streets, such as Church Street and a relatively new street near the Watergold apartments running on an east-west route between the Douglas Court Shopping Centre and the traditional village centre of Douglas, which provide mainly retail service uses and non-retail uses. There are however a number of comparison uses near Watergold Street. St. Patrick's Woollen Mills, located off Church Street near Douglas Village Shopping Centre, whilst primarily a light industrial area, also provides a number of retail uses, including a schoolwear shop and a convenience store. The floorspace study undertaken as part of this report reveals that there is **8,274** <sup>12,435</sup> sq.m. of convenience floorspace, **11,694** <sup>12,253</sup> sq. metres of comparison floorspace and **2,141** <sup>431</sup> sq. metres of bulky household floorspace in Douglas.

Amend paragraph A5.3.116 amend as follows:

The largest number of vacancies was observed at Douglas Village Shopping Centre. It is estimated from the floorspace study that there is **5,553** ~~6,010~~ sq. metres of vacant floorspace in Douglas. Within the core retail area it is estimated that there is 4,820 (20%) of vacant floorspace.

Proposed Amendments to Retail Strategy

2.324 **Revisions to Table 1 of the Retail Strategy as per Table 4.2.1 of the Retail Study above. .**

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### **Key Issue no 5: Ballyvolane**

#### Summary of Key Issue:

- 2.32 A number of submissions request revisions to the approach adopted for Ballyvolane within the retail study and strategy.

#### Response to Key Issue:

- 2.33 The approach to Ballyvolane as set out within the draft retail strategy and study which advocates a co-ordinated **approach** between the City and County Council in terms of the future expansion of the centre has been agreed through detailed consultation with the City and County Council and is considered appropriate.

#### Recommendation:

- 2.34 No change recommended to either the Retail Strategy or the Retail Study.

### **Key Issue no. 6: Thresholds for requirements for a Retail Impact Statement and Sequential Test Assessment**

#### Summary of Key Issue:

- 2.35 A number of submissions require the inclusion of a statement within the retail strategy and study that retail impact statements and requirements for compliance with the sequential test assessment will not be required on lands zoned for town centre or district centres purposes. There is also a request for a size threshold for the requirement for a retail impact statement to be set out within the retail study and strategy.

#### Response to Key Issue:

- 2.36 Some of the key policy recommendations of the retail strategy are to adhere to the retail hierarchy and to **promote** ~~protect~~ the vitality and viability of core retail areas. It is not considered appropriate to include a statement within the retail strategy that a RIA or sequential test assessment will not be required for all town centre or district centre zoned lands. In many instances the extent of town centre zoning for settlements within the Metropolitan Area extend beyond the core retail area. Furthermore, the impact of a proposed district centre development on the City Centre may also need to be considered depending on the nature and scale of developments proposed. In this regard, it is considered that the requirement for a retail impact statement or sequential test assessment will be assessed on a case by case basis through consultation with the Local Authority.

#### Recommendation:

- 2.37 No change recommended to either the Retail Strategy or the Retail Study.

### **Key Issue no. 7 Convenience Floorspace Distribution**

#### Summary of Key Issue:

- 2.38 A number of submissions question the distribution of convenience floorspace based on population projections set out within the Regional Planning Guidelines for the South West Region. These submissions raise the point that population growth targeted for the City for 2022 is unlikely to materialise and request a revised distribution on this basis.

#### Response to Key Issue:

- 2.39 The future population distribution as set out within the Draft Retail Strategy and Study is based on population projections set out within the South West Regional Planning Guidelines 2022. The SWRPG 2010 sets out a population target for the Cork City Council area of 150,000 up to 2022, which will form the basis of the City Council's Core Strategy. The use of population projections within the Retail Study which are in accordance with the SWRPG is considered appropriate. **However, in order to acknowledge the uncertainties that exist for the city and county in relation to future population growth, a review of the need to further revise the City and County Development Plan respective population targets will be carried out in consultation with the SWRA, during the lifetime of the development plans taking into account:**

- **The intended review of the NSS;**
- **The review of the SWRPG (due to be complete in 2016);**
- **The CSO review of National population forecasts;**
- **The outcome of the 2016 Census of Population;**

#### Recommendation:

- 2.40 No change recommended to either the Retail Strategy or the Retail Study.

### **Key Issue no. 8: Core retail areas to be defined for all District Centres**

#### Summary of Key Issue:

- 2.41 A number of submissions on the draft retail strategy request the core retail areas are identified for all district centres. **A core retail area is only identified for Douglas within the existing Draft Retail Study.**

#### Response to Key Issue:

- 2.42 **However in order to ensure a consistent approach to all district centres within the retail study** it is recommended that **the core retail area for Douglas is removed from the study.** ~~these are included within Appendix 2 of the Retail Study.~~



Recommendation:

Proposed Amendments to the Retail Study

- 2.43 **Remove the plan identifying the core retail area for Douglas from the Retail Study.** Include core retail areas for all district centres within Appendix 2 of the Retail Study.

Proposed Amendments to the Retail Strategy

- 2.44 Core retail areas are currently not identified within the Retail Strategy therefore no change is required to the Strategy.

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**3.0 RESPONSE TO SUBMISSIONS ON RETAIL STRATEGY/STUDY**

<b>SUBMISSION 1: Dunnes Stores: Submission by Patrick O Neill, Store Development</b>		
<b>POINTS RAISED</b>	<b>RESPONSE TO SUBMISSION</b>	<b>RECOMMENDATION</b>
<b>1. Ballyvolane</b>		
Retail Strategy should advocate that the Ballyvolane lands zoned “District Centre” in the extant Cork City Development Plan are sufficient in size to provide additional floorspace requirements needed to serve the existing and planned population for the north east of the city up to the year 2021.	See response to Key Issue no. 5.	No change recommended as per response to Key Issue no. 5.
<b>2. Curraheen Neighbourhood Centre</b>		
Upgrading of Bishopstown Neighbourhood Centre (Curraheen) to an appropriately sized Level 2 District Centre.	This upgrading is not supported having regard to the role and function of the centre and proximity of Wilton District Centre to the site.	No change recommended.
<b>3. Vacancy Levels will be addressed in light of emerging patterns</b>		
The submission supports the objective of reducing vacancy within Core Retail Areas but notes that vacancy levels should be addressed in light of emerging trading patterns.	See response to Key Issue no. 3.	No change recommended as per response to Key Issue no. 3.

**4. Breakdown of the Distribution of Convenience Floorspace**

Requests further breakdown of distribution of convenience floorspace particularly in relation to Ballyvolane and Douglas.	The further breakdown of convenience floorspace between Cork City and the suburban centres is considered to be overly prescriptive.	No change recommended.
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<b>SUBMISSION 2: Tesco (Ireland Ltd.): Submission by CSR</b>		
<b>1. Ballyvolane</b>		
Development of a District Centre at Ballyvolane being contingent on population and a co-ordinated approach between Cork County and Cork City Councils is at variance with the objectives of the Blarney EA LAP where the site is zoned T-01 Town Centre Development.	<p>The approach to Ballyvolane as set out within the Retail Strategy and Study is in accordance with the approach set out within the 2011 Blarney EA LAP. Paragraph 2.3.5 of this plan outlines that: <i>“given the population growth targeted for Ballyvolane, additional retail facilities will need to be provided at a new district centre serving the area”</i>. It is within this context that the requirement for additional district centre facilities is identified within the LAP.</p> <p>Furthermore, given the proximity of the lands to the administrative boundary of Cork City Council it is considered important that co-ordinated approach to the development of district centre facilities at this location is advocated.</p>	No change recommended.
<b>2. Vacancy</b>		
Vacancy levels not proportional – inappropriate to subtract vacancy levels from the total.	Paragraph 7.3.15 of the study is clear in stating that both vacancies and commitments will be considered on a case by case basis when considering future applications for future retail floorspace. This is the approach that will be adopted in considering future applications for retail development.	No change recommended.

	At a strategic level it is considered important to have an overall policy objective to reduce the level of vacancy across the Metropolitan area and in this context the policy approach detailed within the retail strategy is considered appropriate.	
<b>3. Pipeline Floorspace</b>		
Approach to pipeline is subjective and creates uncertainty and acts as a barrier to the delivery of new floor space in the Metropolitan Area.	The approach to pipeline floorspace as advocated within the retail study is clearly stated and is not considered to act as a barrier to the delivery of new floorspace within the Metropolitan Area. If all commitments were included in the baseline figures there would be limited capacity for new floorspace. It is recommended that a case by case assessment of the likelihood of the implementation of any particular permission should be considered by the Council for each particular area.	No change recommended.
<b>4. Survey Information</b>		
Vacancy and pipeline floorspace information should be supplied as an Appendix to the study	See response to Key Issue no. 4.	<del>As per</del> See response to Key Issue no. 4. Pipeline details to be attached as Appendix to Retail Study. Information on vacancy within the draft study is considered appropriate.
<b>5. Opportunity Sites</b>		
Identified Opportunity sites must be clearly defined and be consistent with the zonings within Development Plans and LAP's.	The outline of opportunity sites within the retail strategy are indicative only. Paragraph 8.2.4 of the retail strategy clearly acknowledges that <i>"The location rather than the precise boundary of the site have been identified in the study"</i> .	No change recommended.



6. Facilitate future Convenience Floorspace in Carrigaline		
<p>The submission requests that reference is including in Section 5.8 of the Draft Strategy to the requirement for further convenience and comparison growth.</p>	<p>This approach is considered appropriate.</p>	<p><u><i>Proposed Amendments to Retail Study</i></u></p> <p>Include the following statement in Paragraph 5.8 and A5.8.19 of the Draft Retail Study <b><u>“The town also has the potential to accommodate further convenience floorspace.”</u></b></p> <p><u><i>Proposed Amendments to Retail Strategy</i></u></p> <p>Incorporate the following revisions to Paragraph 7.24</p> <p><i>“Carrigaline: Potential exists for expansion of comparison <b>and convenience</b> retail floorspace within Carrigaline”.</i></p>

<b>SUBMISSION 3: Aldi Stores (Ireland) Ltd. by Coakley O’ Neill</b>		
<b>1. Aldi’s existing and proposed investment in Cork</b>		
Include specific reference to Aldi’s existing and proposed investment in Cork	Specific reference to competition provided by discount retailers is included in Chapter 3 of the retail study. The draft retail study includes reference to the Aldi regional office and distribution centre in Mitchelstown and the Lidl distribution centre in Charleville. Furthermore each individual health check assessment includes a list of existing convenience retailers in each settlement. It is not considered appropriate to include further specific reference to individual retailers.	No change recommended.
<b>2. Out of Centre Locations</b>		
The submission requests a statement to be included within the retail study “it is acknowledged that out-of centre locations may be acceptable in appropriate circumstances”	Chapter 9 of the Retail Study sets out criteria for assessing future retail developments. The criteria set out include compliance with the 2012 Retail Planning Guidelines including the sequential test which determines that where it can be demonstrated that there are no sites suitable, available and viable within the retail core that an edge of centre or out of centre site can be considered.	No change recommended.
<b>3. Protecting existing investments</b>		
“Inclusion of guidance within the strategy which relates to protecting existing and established investments, in particular those in edge or out of	The retail study sets out guidance for protecting the vitality and viability of existing town centres and core retail area in accordance with the	No change recommended.

<p>centre location, on the basis that the principle of their development has been accepted, and that any proposals for their expansion should be assessed on their own merits, subject to normal planning criteria, and that special regard should be placed on their contribution to the strategic vision and sustainability of the town as a whole".</p> <p>Safeguarding planned investments.</p>	<p>guidance set out within the Retail Planning Guidelines 2012. It is not considered appropriate to include guidance to protect the existing commercial interests of retailers in edge or out of centre locations.</p> <p>The guidance set out within the retail strategy and study recommends that the Planning Authority will consider any planned investments and pipeline permissions in assessing new applications for retail development within the Metropolitan Area.</p>	<p>No change recommended.</p>
<p><b>4. Role of City Centre Core Retail Area</b></p>		
<p>Include reference that the proposed core retail area of the City Centre is comparison shopping.</p>	<p>Core shopping areas are normally characterised by a mix of factors including a primary retail function, predominance of multiples and well established family run stores, few non retail uses and high pedestrianised foot flow. Core areas typically have a mix of both comparison and convenience retail provision as is the case of the core area identified for the City. In this regard, it is not considered appropriate to identify that the core retail area is solely the focus of comparison shopping. It is the focus of all types of retailing. The retail characteristics of the City Centre retail core are clearly described in the study.</p>	<p>No change recommended.</p>
<p><b>5. Requirement for a RIA and Sequential Test</b></p>		
<p>The submission requests the inclusion of a statement that applications for convenience retail in the core retail area or the Commercial Core</p>	<p>See response to Key Issue no. 6.</p>	<p>No change recommended as per response to Key Issue no. 6.</p>

Area of the City or within designated District Centres do not require the preparation of a retail impact assessment or sequential test.		
<b>6. District Centre Core Retail Areas</b>		
Core retail areas for the District Centres should be provided.	See response to Key Issue 8.	Include maps of core retail areas for all district centres within the Retail Study as per response to Key Issue no. 8.
<b>7. Opportunity Site</b>		
Glanmire: designation of site which has permission for an Aldi store as an opportunity site.	The opportunity sites which are designated within the retail study are located directly adjacent to core retail area. <b>It is noted however that the site already has planning permission for a retail development.</b> The site referred to is somewhat removed from the retail core.	No change recommended.
<b>8. Turnover Ratio for Convenience Floorspace</b>		
Not appropriate to adopt a single turnover ratio of €11,000. A turnover of €11,000 does not relate to smaller shops and discount foodstores.  Requests the inclusion of the following: a ratio of €11,000 would apply to superstores with a net retail floorspace of greater than 2,500 sq.m. net, a ratio of €7,000 to €8,000 per sq.m. would apply to supermarkets with a net retail floorspace of less than 2,500 sq.m. net and a ratio of €5,000 to €6,000 applies to local shops.	See Response to Key Issue 1.	As per response to Key Issue 1.
<b>9. Flood Risk</b>		
Include statement to the effect that retail development is acceptable in principle in town centre locations which are also in a Flood Zone A, subject to normal planning considerations.	It is considered beyond the scope of the retail study to comment on Flood Risk. The issue of whether a particular site is appropriate in the context of the Flood Risk Management Guidelines	No change recommended.

	<p>is a matter to be assessed in the statutory Development Plan/Local Area Plan for each settlement where land use zoning will be subject to and assessed under the guidelines.</p>	
<p><b>10. Smarter Travel</b></p>		
<p>Inclusion of the following statement within the retail study: “in the interest of facilitating a shift towards increased access to retailing by sustainable modes of transport, the available options in most of Metropolitan Cork locations are those of cycling and walking”.</p>	<p>The emphasis of the strategy is on town centre locations which are those most accessible by cycling and walking.</p>	<p>No change recommended.</p>

<b>SUBMISSION 4: Lidl Ireland GmbH – The Planning Partnership</b>		
<b>1. Specific Reference to Discount Foodstore Format</b>		
<p>Specific reference to the operation of discount foodstores- trade draw continues to be different.</p> <p>Limited size of discount foodstores as well as the limited range of goods stocked does not cause a significant retail impact on town centre functions</p>	<p>The 2012 Retail Planning Guidelines no longer distinguish between main stream convenience retailers and discount foodstores. The draft retail study has been prepared in light of the guidance set out within the Retail Planning Guidelines and in this regard it is not considered appropriate to distinguish between different formats of convenience retailers.</p>	<p>No change recommended</p>
<b>2. Size Thresholds for RIA &amp; Sequential Test</b>		
<p>Retail Impact, need and sequential test to be demonstrated only where necessary i.e. where a foodstore would exceed 1,750 sq.m. gross, 1,500 sq.m. net, or located in a Level 4 or lower urban centre in the retail hierarchy.</p>	<p>See response to Key Issue no. 6.</p>	<p>See response to Key Issue no. 6.</p>
<b>3. Requirement for a RIA and Sequential Test on Retail Town/ Centre zoned lands</b>		
<p>Sequential test is not required where a proposed foodstore is located in lands zoned for retail/town centre development.</p>	<p>See response to Key Issue no. 6.</p>	<p>See response to Key Issue no. 6.</p>
<b>4. Requirement for Additional Retail Facilities</b>		
<p>Store size requirements of discount operators provide a challenge to locating within the town centre, or neighbourhood centre (Cork City). Facilitate the expansion of neighbourhood centres on appropriately zoned lands and a policy to</p>	<p>The draft study recommends the provision of additional convenience retail floorspace at appropriate locations. See response to Key Issue 2.</p>	<p>No change recommended.</p>



<p>develop multiple supermarkets to facilitate local competition.</p> <p>Provision of suitably sized foodstores should be encouraged in locations close to centres of population. Foodstore developments will be encouraged in locations where there is none or limited retail provision in the area irrespective of the area being subject to population increase.</p>	<p>It is appropriate that the retail study supports the development of additional neighbourhood facilities in areas which are subject to population growth or existing residential areas which are currently underserved. In this regard it is proposed to include the following in paragraph 8.6.3 of the retail study.</p> <p><i>“The Planning Authorities may need to consider the designation of new neighbourhood centres or expanding existing neighbourhood centres during the preparation of the new Development Plans where significant additional population growth is planned <b><u>or where existing residential areas are currently underserved</u></b>”.</i></p>	<p><u><i>Proposed Amendments to Retail Study</i></u></p> <p>Include the following additional text within Paragraph 8.6.3 of the Retail Study.</p> <p><i>“The Planning Authorities may need to consider the designation of new neighbourhood centres or expanding existing neighbourhood centres during the preparation of the new Development Plans where significant additional population growth is planned <b><u>or where existing residential areas are currently underserved</u></b>”.</i></p>
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<b>SUBMISSION 5: Mc Cutcheon Halley Walsh – O’ Flynn Construction – Cork County</b>		
<b>1. Expenditure Per Capita Assumptions</b>		
<p>Same approach for convenience expenditure and comparison expenditure notwithstanding the fact that convenience sector has retained growth.</p> <p>Submitted that: retail expenditure levels particularly for convenience retailing are carefully monitored to ensure that market demand for additional retailing is not constrained by conservative assumptions of growth.</p>	<p>The growth levels applied to convenience and comparison expenditure per capita are considered appropriate. The study assumes no growth in convenience expenditure per capita between 2010 and 2013 and this approach is in accordance with retail trends observed from the Retail Sales Index. Growth in convenience is resumed to 1% per annum from 2013 to 2022. A 2% growth rate per annum from 2013 to 2016 is assumed for comparison expenditure 3% from per annum from 2016 to 2022.</p> <p>The reference in the submission that retail expenditure levels are monitored is addressed in Paragraph 10.2.13 of the retail study.</p>	<p>No change recommended.</p>
<b>2. Expenditure Turnover Assumptions</b>		
<p>More detailed explanation is made for turnover assumptions made and appropriate adjustments are made to take account of the differences in turnover per sq.m. depending on the type, size and location of units.</p>	<p>See Response to Key Issue no. 1</p>	<p>As per response to Key Issue no. 1</p>
<b>3. Convenience Floorspace Distribution between City / Metropolitan Area</b>		
<p>Submissions considers that growth targeted for the City Centre will not be achieved and recommends a revised distribution of floorspace which provides a larger distribution to the rest of</p>	<p>See Response to Key Issue 7.</p>	<p>As per Response to Key Issue 7.</p>

Metropolitan Cork.		
<b>4. Policy for Neighbourhood Centres and Large Villages</b>		
<p>Specific policy should be drafted for Level 4 centres acknowledging that these should have a more significant retail function than level 5 centres and include guidance for small scale expansion of existing neighbourhood centre in line with the recommendations of the study.</p> <p>The retail strategy should be revised to include reference to small scale expansion of existing neighbourhood centres in accordance with the guidance in the retail study.</p>	<p>A specific policy for Level 4 neighbourhood centres will be incorporated within the retail strategy as per response to Key Issue no. 2.</p>	<p>As per response to Key Issue no. 2.</p>
<b>5. Little Island</b>		
<p>More appropriately designated as a Level 3 Small Metropolitan Town having regard to its strategic employment importance and existing workforce population.</p> <p>Recommends revisions to Policy 5 of the Retail Strategy to include reference to the planned “residential and workforce population”.</p> <p>Policy 12 of the Draft Retail Strategy takes no account of the fact that Little Island currently provides the 3<sup>rd</sup> largest quantum of existing retail</p>	<p>The level of each settlement within the retail hierarchy reflects its role within the settlement hierarchy. Little Island currently accommodates less resident population and limited provision of convenience and comparison floorspace when compared with existing Level 3 centres. The designation within the retail hierarchy relates primarily to population base rather than employment base as retail expenditure is much more closely aligned with resident population than employment numbers.</p> <p>The scale and nature of existing development within Little Island is acknowledged within Section 5.4 of the retail study. Additional reference can be</p>	<p>No change recommended.</p> <p>Include additional text in paragraph 5.4.21 of the retail study in respect of the role of Eastgate Retail Park as follows: <b><i>“Eastgate Retail Park is an</i></b></p>

<p>warehousing/bulky goods within the Metropolitan Area. Little Island should be recognised as a “Core Retail Warehousing” location <b>warehousing” location</b> and “Established retail warehouse location” within the Retail Hierarchy.</p> <p>Policy support should be provided for addressing vacancy within existing retail warehousing locations.</p>	<p>included in Paragraph 5.4.21 to refer to the quantum of retail warehousing within the Eastgate Retail Park. This level of detail on specific centres is not included within the retail strategy, therefore no amendments are proposed to the strategy.</p> <p>The retail strategy aims to reduce vacancy within existing core retail areas. In considering applications for additional retail warehousing within the Metropolitan Area the Planning Authorities will have regard to vacancy levels of this format of retail floorspace within the vicinity of a proposal.</p>	<p><b><i>established retail warehousing location.</i></b> There are 11 no. units”..... No change recommended to retail strategy.</p> <p>No change recommended.</p>
<p>6. Vacancy Objective</p>		
<p>Supports Policy 7 on Core Retail Areas and Policy 8 which aims to reduce vacancy within core retail areas. Inclusion of the following in Policy 8.</p> <p>Presumption in favour of the reconfiguration of existing vacant units within Core Retail Areas to meet market demands for appropriate retail developments.</p> <p>Flexible consideration will be given to proposed change of use of retail units to either retail services or non-retail uses.</p>	<p>See response to Key Issue no. 3.</p>	<p>As per response to Key Issue no. 3.</p>

<b>SUBMISSION 6: Mc Cutcheon Halley Walsh – O’ Flynn Construction – Cork City</b>		
<b>1. Core Retail Areas</b>		
<p>Eglinton Street – O’ Flynn Construction Elysian development and Model Farm Road</p>	<p>The core retail area includes low, medium and high order comparison shopping. Retail proposals outside the core will be assessed on their merits and in accordance with the RPG’s.</p>	<p>No change recommended</p>
<p>Policy for convenience and lower order comparison retailing within the city should be strengthened</p>		
<p>Policy 7 no distinction between higher order comparison retail and retail development focused on local residential needs, such as convenience and lower order comparison retailing. Retail development proposals, aimed at addressing the needs of the residential population immediately outside the Core Retail Area, may therefore be placed at a disadvantage over more suburban locations.</p>		
<p>Recommends the following revision to Policy 7: <i>Core retail areas: To support the development of the identified Core Retail Areas as the preferred location for new <b>higher order comparison</b> retail development through the appropriate development of identified opportunity sites and through the application of the sequential test.</i></p>		
<p>Inclusion of an additional policy as follows: <i>City Centre&amp; Docklands Areas: To support population growth targets and the development of a high quality residential environment, in areas outside the Core Retail Area but within the City</i></p>	<p>The Docklands Area is currently designated as a Level 2 District Centre within the retail hierarchy set out within the retail study.</p>	<p>No change recommended</p>

<p><i>Centre and Docklands, there will be a presumption in favour of convenience and lower order comparison retail development aimed at serving local residential needs.</i></p>		
<p><b>2. Neighbourhood Centres</b></p>		
<p>Reference to neighbourhood centre catchment and requirement for additional neighbourhood centre facilities.</p>	<p>As per response to Key Issue 2.</p>	<p>See response to Key Issue 2.</p>
<p><b>3. Local Centres</b></p>		
<p>Requests that Paragraph 4.10 includes the following:</p> <p><i>“Local centres should be supported and protected through sensitive management and expansion of larger retail centres. <b>In areas of existing retail deficit, the development of new local centres will be encouraged to provide services at a local level</b>”.</i></p> <p><i>Requests that Policy 6 is amended as follows: Policy 6: To support, promote and protect neighbourhood and local centres, villages and corner shops which provide an important retail service at a local level. <b>The development of new neighbourhood or local centres will be encouraged in line with specific objectives of Development or Local Area Plans.</b></i></p>	<p>The development of new local centres is a matter for the Planning Authorities to address within the relevant Development Plan or Local Area Plan.</p> <p>See response to Key Issue no. 2.</p>	<p>No change recommended.</p> <p>As per response to Key Issue no. 2.</p>



SUBMISSION 7: O' Callaghan Properties – Cunnane Stratton Reynolds:		
1. Site between Mahon Shopping Centre and City Gate Park		
<p>Owners of land between Mahon Point Shopping Centre and the City Gate Park, Office Development – known as an overflow car park.</p> <p>Basis of submission: Council not to preclude the development of the lands for a range of uses that are consistent with Objectives contained in Section 14.44 of the City Development Plan. The site will not be developed for residential purposes as set out within the City Development Plan.</p> <p>These objectives are consistent with objective set out in section 5.3.4 and 5.3.5 of the Joint Retail Strategy.</p> <p>The submission recommends the following revisions to paragraph 5.3.5 of the retail Strategy:</p> <p><i>5.3.5 Any future development proposals for Mahon Point Shopping Centre on the district centre zoned lands <b>or adjoining lands associated with the District Centre</b> should seek to develop the area as a mixed use urban centre, with urban design and access improvements, particularly from the residential areas to the north. It will be important to also improve the range of <b>limited comparison retail, retail, retail services and</b></i></p>	<p>The zoning of additional lands for retail purposes is not a matter for the retail study. Only a limited expansion of Mahon is considered appropriate as set out in the strategy.</p>	<p>No change recommended</p>

<p><i>community facilities on offer to ensure that the centre fulfils its role as a district centre serving the needs of its local catchment rather than acting primarily as a comparison destination.</i></p> <p>The submission requests the inclusion of a new policy (Policy 7.20.1 which sets out the text above)</p> <p>The submission requests that any developments in accordance with Section 5.3.5 should be independent of any alterations to the shopping centre itself and that the Council continue to permit the allowance of a provision in principle for the increase in size of the Centre.</p>		
<p><b>2. Existing Floorspace within Mahon</b></p>		
<p>Submission questions the presence of 16,808 sq.m. net comparison floorspace within Mahon.</p> <p>It is noted within the submission that when Tesco and retail services are excluded, the centre accommodates a gfa of 17,514 sq.m. Applying a new to gross ratio of 80:20 gives a net sales figure of 14,011 sq.m. which is consistent with the 2008 Cork figures.</p> <p>Questions the accuracy of the detailed floorspace serve undertaken in respect of the quantum's of floorspace within Mahon and compares it with previous floorspace data used by JSA in the</p>	<p>The floorspace figures presented within the retail study and strategy are based on up to date floorspace surveys. The survey measures net retail floorspace on the ground and in this regard a net to gross ratio is not assumed within the survey. The submission refers to a comparison floorspace of 14,011 within Mahon but acknowledges that this excludes the Tesco unit. It is noted that there is over 1,100 sq.m. net comparison floorspace within this Tesco unit.</p> <p>The submission does not provide more detailed data as a basis for amending the figures. It does include reference to a lower comparison figures however this is based on applying a standard ratio</p>	<p>No change recommended.</p>

<p>application for the redevelopment of Wilton shopping centre.</p>	<p>to the gross floorspace and does not include comparison floorspace in Tesco which accounts for a significant proportion of the difference in the floorspace figures. The resulting difference is marginal.</p> <p>As this survey was commissioned and undertaken in respect of the review of the Retail Strategy in 2012 it is apparent that this information would not have been available at the time of preparation of the planning application for Wilton Shopping Centre. The assumptions on the quantum of retail floorspace within Mahon used within that application were based on the information contained within the 2008 Cork Strategic Retail Study and updated to include any subsequent permissions.</p>	<p>No change recommended.</p>
<p>Submission requests the Council to make the survey information available.</p>	<p>See response to Key Issue 4.</p>	<p>No change recommended.</p>
<p><b>3. Future Floorspace within Mahon</b></p>		
<p>Request the Council to amend the figure or simply allow a continuance in principle of allowing the extension of Mahon Point Shopping Centre by 10% for urban design reasons as set out within the Development Plan.</p> <p>Submission notes that the Council needs to provide modest investment in Mahon given the County Council's desire to promote Douglas.</p>	<p>Having regard to existing scale, role and function of Mahon in the Metropolitan context the approach to Mahon as set out within the retail study has been agreed with Cork County and City Council and is considered appropriate.</p>	<p>No change recommended.</p>

<p>The submission requests that Policy 7.20 of the Retail Study is revised as follows:</p> <p><i>“Mahon: No significant expansion of comparison floorspace in Mahon is envisaged over the lifetime of the strategy. In contrast with other district centres within the Metropolitan Area Mahon, performs a primarily comparison retail role. The objective for Mahon is to include a greater mix of non-retail uses in order to enhance its district centre function <b>(and some limited expansion will be considered in accordance with established Development Plan policy)</b>”</i></p>		
<p><b>4. Revisions to Section 7.3.17 and 7.3.18 of the Retail Study</b></p>		
<p>-Requests that Section 7.3.17 and 7.3.18 of the study be altered as follows</p> <p><i>“The allocation of retail floorspace outside of the City Centre will be based on the role of each centre within the retail hierarchy, population targets, current market shares, <b>urban design benefits, development of vacant sites, promotion of a good mix of uses, employment generation and capacity to service centres of employment</b> and the quality of existing comparison floorspace within each centre. New developments/permissions should have regard to population and economic growth”.</i></p>	<p><b>No change recommended. Urban design and vacancy objectives for each centre are addressed elsewhere in the retail study where relevant.</b></p> <p>The reference to urban design benefits, development of vacant sites and promotion of a good mix of uses in this submission is considered appropriate.</p>	<p><b>No change recommended.</b> <u>Proposed Amendments to the Retail Study</u></p> <p>Include the following revisions or Section 7.3.17 and 7.3.18 of the Retail Study.</p> <p><i>“The allocation of retail floorspace outside of the City Centre will be based on the role of each centre within the retail hierarchy, population targets, current market shares, <del>urban design benefits, development of vacant sites and promotion of a good mix of uses</del> and the quality of existing comparison floorspace within each centre. New developments/permissions should have regard to population and economic growth”.</i></p>

		<p><u>Proposed Amendments to the Retail Strategy</u></p> <p>No amendments required <b>change recommended.</b></p>
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<b>SUBMISSION 8: Deka Immobilien Investment GmbH owners of Mahon Point Shopping Centre – prepared by Cunnane Stratton Reynolds</b>		
<b>1. Existing Floorspace within Mahon</b>		
Questions the calculation of existing floorspace within Mahon.	As per response to Submission no. 7.	No change recommended as per response to Submission no. 7.
<b>2. Future Growth of Mahon</b>		
<p>Requests that the Council continue to pursue the policy set out within the 2009 City Development Plan which permits the allowance of a provision for a 10% increase in the size of Mahon Point Shopping Centre and should continue to recognise the role that the centre has in meeting the needs of Cork City and promoting the area as a place for investment.</p> <p>Requests policy 7.20 is amended as follows:</p> <p><i>“Mahon: No significant expansion of comparison floorspace in Mahon is envisaged over the lifetime of the strategy <b>but some limited expansion will be considered in accordance with established Development Plan policy.</b> In contrast with other district centres within the Metropolitan Area Mahon, performs a primarily comparison retail role. The objective for Mahon is to include a greater mix of non-retail uses in order to enhance its district centre function”.</i></p>	The approach to Mahon as set out within the retail study has been agreed with Cork County and City Council and is considered appropriate.	No change recommended

<p><b>3. Revisions to Section 7.3.17 and 7.3.18 of the retail study</b></p>		
<p>Requests Paragraphs 7.3.17 and 7.3.18 be altered as follows:</p> <p><i>“The allocation of retail floorspace outside of the City Centre will be based on the role of each centre within the retail hierarchy, population targets, current market shares, <b>urban design benefits, development of vacant sites, promotion of a good mix of uses, employment generation and capacity to service centres of employment</b> and the quality of existing comparison floorspace within each centre. New developments/permissions should have regard to population and economic growth”.</i></p>	<p>Revision recommended as per response to submission no 7.</p>	<p>As per response to submission no. 7.</p>

<b>SUBMISSION 9: Mc Carthy Developments – Roger Tym and Partners</b>		
<b>1. Neighbourhood Centres</b>		
Definition of catchment area and requirement for additional neighbourhood centre facilities.	As per response to Key Issue 2.	As per response to Key Issue 2.
<b>2. Sales Density Assumptions</b>		
<p>Appropriate use of sales densities: not appropriate to adopt a single sales density assumption for all new convenience goods stores, particularly for small symbol or discount stores. The quantum of convenience goods required in the future would be greater if account is taken of the differential turnover achieved by larger supermarkets and small stores.</p> <p>The submission suggests the application of a sales density of 12,000 per sq.m. for large stores and 6,000 per sq.m. for symbol stores and discount foodstores to estimate the requirement for additional floorspace.</p>	As per response to Key Issue 1.	As per response to Key issue 1.

<b>SUBMISSION 10: Donncha Loftus- McCutcheon Halley Walsh</b>		
<p>Ballyvolane: Lands Designated as X-01 within the Blarney EALAP</p> <p>Submission requests that the retail hierarchy is amended and a neighbourhood centre to service the new residential community at Ballyvolane (X-01) is included.</p> <p>Retail strategy to state that the new Neighbourhood centre will be upgraded to a District Centre if the proposed upgrade of the existing Fox and Hounds Neighbourhood Centre to District Centre (provided for as T-01 in the 2011 Blarney LAP) proves not feasible by amending Section 7.16 as follows:</p> <p><i>Ballyvolane: The future expansion of retail floorspace in Ballyvolane will be subject to a co-ordinated approach by Cork City Council and Cork County Council. Demand for additional comparison retail floorspace in Ballyvolane will be driven by the future population of the Ballyvolane Masterplan Area as per the Blarney Electoral Area Local Area Plan. <b>It is envisaged that additional convenience floorspace will be delivered through the development of the site zoned T-01 in the Blarney Electoral Area Local Area Plan. However, if development of the T-01 site proves not feasible the required convenience floor space</b></i></p>	<p>Site is not appropriate for a District Centre as it does not have the characteristics necessary to justify district centre status. The approach to Ballyvolane as set out within the Retail Strategy and Study is considered appropriate.</p>	<p><b>No change recommended.</b></p>



<p><b>could be achieved by upgrading the proposed Neighbourhood Centre to serve the X-01 lands to a District Centre.</b> <i>The delivery of additional comparison floorspace in Ballyvolane must also be in tandem with a range of other ancillary retail services, community and social infrastructure in order to facilitate the development of Ballyvolane into a fully functioning district centre.</i></p>		
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<b>SUBMISSION 11: Cork Chamber of Commerce and Business Association</b>		
<b>1. Vision Statement</b>		
The Chamber of Commerce request a vision statement to be included within the retail strategy.	The retail strategy and study set out clear policies aimed at enhancing the role and function of the City Centre as the principle retail centre of the Metropolitan Area and the region.	No change recommended.
<b>2. Integration and alignment of Inter Related Strategies into the Joint Retail Strategy</b>		
<p>Refers to the Cork City Centre Strategy and Cork City Centre Movement Strategy.</p> <p>Better integrate and address the relationship between sustainable transport and retail – including implementation of Cork Area Transit Study, introduction of an Orbital Bus Route in the City Centre, additional Park and Ride systems, parking incentives in multi storey car parks operated by the City Council.</p> <p>Addressing relationship between public realm and retail – City Centre Strategy includes proposals regarding the design public realm – no reference is made to these within the retail strategy. Include innovative measures to enhance the retail experience.</p>	<p>The retail study makes a number of specific recommendations in relation to the public realm upgrades within the City Centre. Reference to the additional documents Cork City Centre Strategy and the City Centre Movement Strategy can be included within the retail study.</p> <p>The Retail Strategy does not set out specific policies and objectives for centres within the Metropolitan Area; this level of detail is provided within the Retail Study. In this context no changes are proposed to the Retail Strategy.</p>	<p>Include reference to City Centre Strategy and Movement Strategy within the Retail Study.</p> <p><u><i>Proposed Amendments to the Retail Study:</i></u></p> <p>Include the following text at the end of paragraph 8.3.13 of the Retail Study which relates to Improvements to the public realm:</p> <p><u><i>The public realm upgrade proposals are as set out within the City Centre Strategy.</i></u></p> <p>It is furthermore considered that the following reference at the end of Paragraph 8.3.28 of the Retail Study:</p> <p><u><i>Measures to enhance accessibility and parking within the City Centre are as set out within the City Centre Movement Strategy.</i></u></p>

		<i>Proposed Amendments to the Retail Strategy</i> No change recommended.
<b>3. Development Strategies to address Vacancy Rate and Extant Permissions</b>		
More detailed proposal for reduction in vacancy rate by 50% to be included within the retail strategy. Define "short term" and how this reduction would be achieved.	See Response to Key Issue 3. -	As per Response to Key Issue 3.
Retail Strategy should include reference to the extant permissions as included within the retail study.	Reference to extant permissions is set out within paragraph 6.4 of the retail strategy.	No change recommended.
<b>4. Addressing requirement for Larger Floor space units whilst simultaneously encouraging independent retail</b>		
Retail Policy should by way of zoning concentrate on the provision of an additional department store and simultaneously encourage independent boutiques/retail stores.	The retail study encourages the future provision of both independent retailers and large floorspace retail units within the City Centre. The translation of this objective into zoning is beyond the scope of the retail study and considered to be a matter for the Development Plan/LAP for each particular area.	No change recommended.
<b>5. Clear Implementation Plans, Bench Marks and Monitoring Systems</b>		
Lack of strategy and implementation plan to ensure the effective monitoring and review of the effectiveness of the retail strategy in meeting goals is insufficiently addressed.	These points are addressed within the Draft Retail Study. A detailed monitoring programme is set out within Chapter 10 of the Retail Study which recommends an annual review of vacancy levels and monitoring of uptake of extant retail permissions. The establishment of a City Centre Retail Forum is specifically recommended in	No change recommended.
Clear bench marks needs to be set across criteria such as reduction in vacancy, uptake of extant		

<p>permission and capacity to alter specific recommendations.</p> <p>Document should be a “live” document and subject to review based on evolving trends and requirements.</p> <p>Recommends the establishment of a retail forum.</p>	<p>Chapter 8 of the retail study. The retail study sets the basis for on-going monitoring of trends to be undertaken. Further steps will need to be undertaken by the City and County Councils after the publication and adoption of the retail strategy.</p>	
<p><b>6. Addressing Flooding within the Retail Strategy</b></p>		
<p>Reference to support the retail sector resolving impediments to flooding</p>	<p>It is considered beyond the scope of the retail study to comment on Flood Risk. The issue of whether a particular site is appropriate in the context of the Flood Risk Management Guidelines is a matter to be assessed in the statutory Development Plan/Local Area Plan for each settlement where land use zoning will be subject to and assessed under the guidelines.</p>	<p>Action: No change recommended.</p>
<p><b>7. Development Contributions</b></p>		
<p>Encourage amendments to the development contributions scheme to include the assumption against development contributions on change of use applications.</p>	<p>The issue of development contributions is not a matter for the retail strategy.</p>	<p>No change recommended.</p>

<b>SUBMISSION 12: Construction Industry Federation</b>		
<b>1. Expenditure and Turnover Assumptions</b>		
<p>Turnover per sq.m. has not had regard to different nature of retail floorspace</p> <p>Expenditure assumptions result in limited demand for additional retail floorspace in the medium term.</p>	<p>See Response to Key Issue no. 1</p> <p>The assumptions on expenditure per capita are based on the most up to date information available from the Annual Services Inquiry which was published in 2012 and includes information on per capita expenditure for 2010. The growth rates applied to both convenience and comparison expenditure per capita between 2011 and 2022 are considered appropriate. A growth rate of 1% per annum is applied to convenience expenditure from 2013 to 2022 which is in accordance with the rates sets out within the Retail Sales Index. A growth rate of 2% per annum between 2013 and 2016 and 3% per annum from 2016 to 2022 is assumed for comparison expenditure. No growth is assumed between 2010 and 2013 in accordance with trends observed from the retail sales index.</p>	<p>As per response to Key Issue no. 1.</p> <p>No change recommended.</p>
<b>2. Distribution of Convenience Floorspace</b>		
<p>Distribution of Convenience retailing between Cork City and the Rest of Metropolitan Cork should be readjusted.</p>	<p>As per response to Key Issue no. 7</p>	<p>As per response to Key Issue no. 7</p>
<b>3. Recognition of Workforce Population</b>		
<p>Retail Strategy should take cognisance of appropriateness of locating convenience retailing within areas of strong workforce populations.</p>	<p>Any applications for additional convenience facilities within the Metropolitan Area will be considered on their merits by the Planning</p>	<p>No change recommended.</p>

	Authority and in accordance with Development Plan or Local Area Plan objectives.	
<b>4. Addressing retail vacancy</b>		
<p>Target of reducing vacancy by 50% welcomed. Submission notes that it would be strengthened by the inclusion of the following:</p> <p><i>“There will be a presumption in favour of reconfiguration of existing vacant uses to meet market demands for appropriate retail developments – either in terms of sub-division or merging of existing units”.</i></p> <p><i>“Flexible consideration will be given to proposed change of use of retail units to either retail services or non-retail uses”.</i></p>	See response to Key Issue no. 3.	As per response to Key Issue no. 3.
<b>5. Little Island</b>		
Requests that Little Island is recognised as a Core Retail Warehousing Location.	See response to Submission 5.	See response to Submission 5.
<b>6. Pipeline Permissions</b>		
Future retail development should not be stifled by extent permissions. Strategy should state that a pragmatic approach should be taken to extant permissions.	The approach adopted within the retail study and strategy promotes a case by case assessment of the likelihood of implementation of pipeline permissions. The approach adopted avoids stifling of future retail development by extant permissions.	No change recommended.
<b>7. Neighbourhood Centre Policy</b>		
Draft Retail Strategy does not include a specific policy for Level 4 neighbourhood centres. Assumed this is a drafting error.	See Key Issue no. 2.	See Key Issue no. 2.

<b>SUBMISSION 13: Karl Mc Coy Property Consultant – Carraigdubh Developments Cork Limited t/a Alchemy Properties</b>		
<b>Opportunity Site</b>		
<p>Regarding Site at the junction of Kinsale Road and Tramore Road</p> <p>Under Register Reference 10/34696 planning permission was granted for two storey motor service and sale facility 3,602 sq.m. This has not progressed for reasons of commercial feasibility.</p> <p>Site is zoned light industrial purposes within the 2009-2015 City Development Plan. This zoning is no longer appropriate for the site.</p> <p>Kinsale and Tramore Road is the second most popular area after the City Centre for furniture and electrical goods. Its role is not given adequate recognition in the strategy.</p> <p>It is requested that the site is designated as an opportunity site for redevelopment within the Strategy.</p>	<p>The opportunity sites which are identified within the retail study are designated due to their potential to strengthen identified town and city centres in accordance with the Retail Planning Guidelines. In this regard it is not considered appropriate to designate the site at Kinsale Road and Tramore Road as an opportunity site. Any future development proposals for this site will be considered on its merits by the Council and in accordance with the guidance on the location of retail warehouse units as set out within the retail study.</p>	<p>No change recommended.</p>

<b>SUBMISSION 14: Joe/ Carey &amp; Millfield Investment Partners - Cunnane Stratton Reynolds</b>		
<b>1. Millfield Site, Blackpool</b>		
<p>Millfield site has capacity to contribute to the growth of Blackpool as an urban centre</p> <p>Allowing food retail to occur on the Millfield site will have a positive impact in meeting Council objectives and drawing footfall between existing Blackpool Shopping Centre and the new consents north east of the Blackpool Retail Park (i.e. Millfield and Sunbeam sites).</p> <p>Zoned as part of District Centre by Cork City Council in North Blackpool LAP 2011 and Variation no. 5 of City Development Plan.</p> <p>Requests amendments to paragraph 7.3.22 as follows to ensure consistency with Section 8.5.1 of the Strategy:</p> <p><i>“Blackpool: Mixed use development should be encouraged within Blackpool to include retail and non-retail uses. It is an objective to consolidate Blackpool and provide a much improved urban environment and greater mix of uses. In Blackpool there is potential for comparison <b>and convenience / supermarket expansion north east of the existing retail park to deliver improvements in urban design and linkages as explained in Section 8</b>”.</i></p> <p>Requests Policy 7.15 is amended as follows:  <i>“7.15 Blackpool: Mixed-use development should</i></p>	<p>Paragraph 7.3.22 of the Study is referring to the allocation of comparison floorspace. The provision of <u>convenience</u> floorspace is referred to in Paragraph 7.3.2 and Table 7.3.1.</p> <p>Furthermore, “detailed guidance on the appropriate form of development for the five designated district centres is provided in the development plan and / or local area plans / action area plans” (Paragraph 8.5.1 Study).</p> <p>The North Blackpool Local Area Plan 2011 has set out the land-use, urban design and movement strategies for the area.</p> <p>Paragraph 7.15 of the Strategy is referring to the allocation of comparison floorspace. The provision of <u>convenience floorspace</u> is referred to in Paragraph 7.2 and Table 4.</p> <p>To refer to one specific area/ site in this instance is inappropriate, having regard to the wider potential of the ‘district centre’ land use zoning. Any future development proposals on lands in or adjacent to the Blackpool ‘district centre’ land use zoning will be considered on its merits by the Planning Authority.</p>	<p>No change recommended.</p>



<p><i>be encouraged within Blackpool to include retail and non-retail uses. It is an objective to consolidate Blackpool and provide a much improved urban environment and a greater mix of uses. In Blackpool there is potential for comparison <b>and convenience (subject to Retail Impact Assessment)</b> expansion to deliver improvements in urban design and linkages".</i></p>		
<p><b>2. Inconsistency in Retail Figures</b></p>		
<p>We note that there are significant deviations in what JSA stated was on the site in Tesco on Wilton in their Alvonway Planning Application Documents and the Joint retail strategy that they have written.</p>	<p>There are not any "significant deviations" in the between the retail strategy and the Alvonway Planning Application Documents. We note CSR's reference in the submission to the floor area of Tesco. However the submission omits reference to the other convenience floorspace in the shopping centre and in the district centre zoned lands outside of the shopping centre. When these are taken into consideration the figures are consistent notwithstanding the 4 year intervening period during which some changes in floorspace will most likely have taken place.</p>	<p>No change recommended.</p>

<b>SUBMISSION 15: Pat O'Donovan, O Donovan Transport- Cunnane Stratton Reynolds</b>		
<b>Site Specific Submission Regarding O' Donovan Transport Site, Carrigtwohill</b>		
<p>Clients are landowners of a significant Town Centre site on Main Street, Carrigtwohill. The site is currently used as a transport depot. Zoned T-01 within the Carrigtwohill LAP 2011.</p> <p>Opportunity Site identified as Rossdale Development. The T01 lands also include the O' Donovan Transport Site to the west.</p> <p>Requests that the core retail area should be extended to include the site in accordance with the TC zoning objectives pertaining to the site.</p> <p>"The O'Donovan Transport site is in our opinion sequentially the best placed of the available sites within Carrigtwohill to cater for large format retail uses with good access onto Main Street; this should be reflected in the retail strategy."</p> <p>It is requested that the retail Strategy acknowledges that a phased approach to retail provision will most likely be required.</p>	<p>The wording of Opportunity site will be amended to included reference to the O' Donovan Transport Site in Appendix A4 of the retail study.</p> <p>The core retail areas identified within the Study relate to existing retail cores. In this regard it is not considered appropriate to extend the core to include the full extent of the site.</p> <p>Any future developments and phasing of development for designated opportunity sites will be considered on their merits by the Planning Authority.</p>	<p><u>Proposed Amendments to Retail Study:</u></p> <p>Include reference to the O' Donovan Transport site within appendix A4. No change recommended to the core retail area.</p> <p><u>Proposed Amendments to Retail Strategy:</u></p> <p>No change recommended.</p> <p>No change recommended.</p> <p>No change recommended.</p>

<b>SUBMISSION16: William Cuddy - Little Island Business Association</b>		
<b>Little Island</b>		
<p>Little Island is classified as a 'Level 4 settlement',</p> <p>No recognition within the document of the substantial retail warehousing role that it fulfils.</p> <p>The strategy should recognise that the little island and parish community consists of 13,000 residents of Little Island and Glounthane parish as well as more than 7,000 people working in the area. Basing its development on residential development without regard to its links to Glounthaune or the business community will restrict potential growth in the area. Little Island should be classified as 'Level 3' settlement within the retail hierarchy.</p>	<p>See response to Submission 5.</p> <p>The existing quantum of retail warehousing floorspace within Little Island is clearly identified within the retail study.</p> <p>See response to Submission 5.</p>	<p>See response to Submission 5.</p> <p>No change recommended.</p> <p>See response to Submission 5.</p>

<b>SUBMISSION 17: Shipton Group- Clayton Love</b>		
<b>1. Town Health Checks</b>		
<p>Need to go into more detail.</p> <p>In addition to simply totalling the number of units in an area there should also be a space occupied assessment which takes into account the nature of building and the available retail space therein.</p> <p>We also recommend that an areas retail offering should be assessed in terms of unit size. (e.g. Anchor stores should be named and listed).</p>	<p>The detailed health check assessments undertaken to inform the retail strategy were undertaken in accordance with the guidance and criteria set out within the 2012 Retail Planning Guidelines. Detail assessments of individual units are beyond the scope of the study.</p>	<p>No change recommended.</p>
<b>2. Unapproved Retail Uses</b>		
<p>More emphasis needs to be placed on the existence of unauthorised retail units.</p> <p>Immediate enforcement action required from the Councils.</p> <p>These unauthorised units need to be excluded from your overall numbers but in some way noted and scheduled (certainly totalled).</p>	<p>The retail survey undertaken to inform the retail study was based on the existing provision of retail floorspace on the ground. Any enforcement action is a matter for the City/County Council to follow up upon.</p>	<p>No change recommended.</p>
<b>3. Retail Core Areas</b>		
<p>All Town Centre/District Centre core retail areas should be mapped.</p>	<p>The core retail areas within the retail study identify the existing retail cores for each centre.</p>	<p><b>Remove the Douglas district centre</b> Include core retail area maps as per response to Key</p>

<p>If District Centres maps are not be provided a statement should be included that this correspondence with the District Centre zoning.</p> <p>There needs to be consistency in the Preparation of area maps (inconsistencies in maps issued by County Council in relation to the development plan review).</p> <p>There needs to be clarity, so it seems most appropriate that towns would have two retail core area maps (first for current and the second would show expected by 2022)</p> <p>For the benefit of on-going retail health checks it would be of benefit for the core retail maps to rate streets.</p> <p>Retail core areas in the future should expand to include key transport hubs.</p>	<p><del>It is proposed to include the core retail area maps for the district centres as per response to Key Issue no. 8.</del></p>	<p>Issue no. 8.</p>
<p><b>4. VAT and Retail Spend</b></p>		
<p>Spend per person is used throughout the study and it is assumed that these are VAT inclusive. Clarification of this would be helpful.</p>	<p>All figures included within the study are inclusive of VAT. This will be clarified within the study.</p>	<p><u>Proposed Amendments to Retail Study:</u></p> <p>Include the following in Paragraph 6.4.4 of the retail study <b><u>"These figures are inclusive of VAT"</u></b>.</p> <p><u>Proposed Amendments to Retail Strategy:</u></p> <p>This level of detail is not included within the Retail Strategy therefore no change is recommended.</p>

<b>5. Sales Density Figures</b>		
<p>€11,000 as an average sales figure, how was this number reached.</p> <p>How was the average of €7,000 per sq.m. for comparison reached?</p> <p>Strategy to address the variances in sales densities between different formats of retail units.</p>	See Response to Key Issue no. 1	See response to Key Issue no. 1.
<b>6. Quantitative Space Analysis</b>		
<p>Floorspace breakdown for individual areas required</p> <p>Figure for bulky goods space in Blackpool retail centre requested</p> <p>Mahon- entire retail park classified as Bulky?</p>	See response to Key Issue no. 4	See response to Key Issue no. 4
<b>7. City Specific Issues</b>		
<p>Additional Opportunity Sites:</p> <p>1. Lands between Patrick Street and Railway Station.</p> <p>2. South Mall, which is beginning to loose its appeal.</p>	The focus of identified opportunity sites is to strengthen the existing retail core and the emphasis is on sites in or immediately adjacent the retail core in accordance with the sequential test.	No change recommended.

<b>8. Blackpool District Centre</b>		
<p>Plans to reopen the Blackpool/ Kilbarry rail station.</p> <p>It has a key role in the future consolidation of Blackpool District Centre.</p> <p>Needs to be prioritised by the City and County Council.</p>	<p>This is not a matter for the retail strategy.</p>	<p>No change recommended.</p>
<b>9. Monard, Mallow and Carrigtwohill</b>		
<p>Towns located on the commuter rail line.</p> <p>In Monard the rail station has a central focus in the Masterplan for the town.</p> <p>Mallow and Carrigtwohill opportunities to pull the rail stations closer to the central retail core to be considered.</p> <p>Draft Strategy should encourage retail development that will support the above.</p>	<p>The location of future retail development within Monard is addressed separately by the Council within the SDZ for the town. Mallow is not located within the Metropolitan Area and therefore is not addressed within the retail study. An opportunity site in the vicinity of the rail station is identified within Carrigtwohill in the draft retail study.</p>	<p>No changes recommended.</p>
<b>10. Midleton</b>		
<p>Retail core should be extended northwards to a line north of SuperValu.</p> <p>Benefits include pulling Main Street and rail station together and act as a catalyst for the commencement of development in the Water rock area.</p>	<p>The core retail area for Midleton as set out within the retail study relates to the existing retail core of the town.</p>	<p>No change recommended</p>

<b>11. Carrigaline – Core Retail Areas</b>		
<p>Inconsistencies between the Development Plan Retail Core Area and the Retail Strategy. (The exclusion of Lidl in the Retail Strategy).</p> <p>There needs to be clarity on where the core retail area grows to by 2022, development plan has zoned east of the western relief road and the Retail strategy should reflect this.</p>	<p>The core retail areas within the retail study identify the existing retail cores for each centre. The retail core can be reviewed or expanded further to reflect future developments or other changes as appropriate. A number of opportunity sites for expansion of the core have been identified.</p>	<p>No change recommended.</p>

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<b>SUBMISSION 18: McCutcheon Halley Walsh - Kinsale Road Retail Park on behalf of Motor Services Ltd.</b>		
<b>Kinsale Road</b>		
<p>Identify Kinsale Road Retail Park as a designated retail park as defined by the Retail Planning Guidelines and requests that the floorspace at this location is removed from the Cork City and Suburbs Retail Warehouse Floorspace.</p>	<p>Specific reference to the existing retail warehousing provision at Kinsale Road is included within paragraphs 5.4.24 to 5.4.26 of the Retail Study and this is considered appropriate. It is also considered appropriate to classify the Kinsale Road floorspace figures within the Cork City and Suburbs area.</p>	<p>No change recommended.</p>
<p>Allow for additional retail opportunities in the Kinsale Road area, by extending the existing Neighbourhood Centre designation Tory Top Road, Curragh Road, to include part of our client's lands at Kinsale Road. It is acknowledged that zoning will take place as part of the City Development Plan Review it is requested that the retail strategy sets the basis for this amendment.</p>	<p>See Response to Key Issue no. 2</p>	<p>See Response to Key Issue no. 2</p>

<b>SUBMISSION 19: McCutcheon Halley Walsh- Proposed Neighbourhood Centre at Sarsfield Road - on behalf of O'Brien and O' Flynn</b>		
<b>Additional Neighbourhood Centre Designations</b>		
<p>Proposes the designation of site at Sarsfield Road, Wilton as a Neighbourhood Centre in the Metropolitan Cork Joint Retail Strategy 2014.</p> <p>The draft strategy does not designate any new site for retail development in the south-eastern environs of the city where there has been significant population growth in recent years.</p> <p>The existing neighbourhood developments have limited or no capacity to expand thus, necessitating the development of a new mixed-use neighbourhood centre to serve the catchment population of this part of the city.</p>	<p>See Response to Key Issue no. 2</p>	<p>As per response to Key Issue no. 2</p>

<b>SUBMISSION 20: Coakley O'Neill - On behalf of Douglas Developments Ltd. in respect of Douglas Court Shopping Centre.</b>		
<b>1. Future Development of Douglas</b>		
<p>Redevelopment at Douglas and particularly Douglas Court Shopping Centre will need to be focussed on attracting new comparison retail floorspace – large anchor stores and a number of large floorspace comparison units.</p> <p>Commercial advisors have identified the demand for 7,000 sq.m. comparison floorspace, 1,000 sq.m. net convenience floorspace and 1,000 sq.m. net of retail services floorspace.</p>	<p>The retail study, at Appendix 6, Section 6.10.8, specifically recognises the potential for the refurbishment of Douglas Court Shopping Centre. Paragraph 7.3.25 of the retail study identifies the potential for a modest increase in the comparison floorspace within Douglas. The priority for the centre is to reduce current levels of vacancy.</p>	<p>No change recommended.</p>
<b>2. Core Retail Area</b>		
<p>Core retail area does not include adjoining car surface parking areas or the extension to the Shopping Centre as permitted by An Bord Pleanála.</p> <p>Core boundary should be amended to include the full extent of the Shopping Centre as set out within the Douglas LUTS.</p> <p>No core retail boundaries identified for other suburban district centres. These have the benefit of a district centre retail zoning.</p>	<p><del>The purpose of the core retail area is to define the existing core active retail areas within the settlement. In the case of Douglas Court Shopping Centre, this is the existing Shopping Centre itself. The surface car park does not constitute part of the existing core retail area. Whilst recognising that there is an extant planning permission for the extension of the Shopping Centre, the permitted extension to the Shopping Centre may not be realised as such it is not appropriate to include this area within the core retail area currently. The core retail areas within the retail study identify the existing retail cores for each centre. Opportunities for expansion of the core can be facilitated via expansion within designated retail opportunity sites. The LUTS identifies</del></p>	<p><u>Proposed Amendments to Retail Study:</u></p> <p><b>Remove identified core retail area for Douglas from</b> <del>Include core retail areas for all district centres within</del> Appendix 2 of the Retail Study as per response to Key Issue 8.</p> <p><u>Proposed Amendments to Retail Strategy:</u></p> <p>Details of core retail areas are not provided within the Retail Strategy therefore no change is recommended.</p>

	<p><del>'precincts', as distinct from core retail areas, and in this respect it is not considered that there is any contradiction between the LUTS and the retail study.</del></p> <p><b>To ensure consistency with other district centres it is recommended that core retail areas are not defined. The core retail area for Douglas as identified within the retail study be deleted.</b> Core retail areas for all district centres will be identified and included in the strategy.</p>	
<b>3. Floorspace requirements</b>		
The retail strategy should acknowledge that new floorspace figures are indicative.	The floorspace figures as set out within the retail strategy and retail study are labelled as floorspace potential.	No change recommended.
<b>4. Requirement for a retail impact statement</b>		
Strategy should state that there is no requirement for a RIS to support a proposal for retail development within designated district centres such as Douglas Court.	See Response to Key Issue no. 6.	See response to Key Issue no. 6.
<b>5. Mahon Point</b>		
Restriction on size of district centres not to exceed Mahon Point retained in the retail strategy.	It is considered appropriate to retain the objective to restriction of the growth of district centres beyond the size of Mahon within the Draft Retail Strategy.	No change recommended.
Comparison floorspace at Mahon Point is stated	See Response to Submission no. 7.	As per response to Submission no. 7.

<p>at 16,808 sq.m.</p> <p>Increase in comparison retailing at Mahon Point has not been fully accounted for or accurately reflected within the draft retail strategy.</p>	<p>A consistent approach to the categorisation of retail floorspace is adopted within the Retail Study.</p>	<p>No change recommended.</p>
<p><b>6. Sales Densities</b></p>		
<p>Standard sales density of €11,000 is unreasonable</p>	<p>See response to Key Issue no. 1</p>	<p>As per response to Key Issue no. 1.</p>

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<b>SUBMISSION 21: Coakley O'Neill - On behalf of Kevin O'Leary Group in respect of lands at South Douglas Road</b>		
<p>The purpose of this submission is to request that the site (South Douglas Road) which comprises a range of local services be acknowledged as a designated as a neighbourhood centre in the JRS to reflect the existing and permitted commercial and neighbourhood centre use on the site.</p> <p>The submission refers to the absence of a designated neighbourhood centre within the area of the site. An 800m neighbourhood catchment from the subject site (figure 3) shows that there are no existing or proposed neighbourhood centres in the area. The nearest neighbourhood centre is 1.5km away at the Curragh Road in Turners Cross.</p>	<p>See response to Key Issue no. 2.</p>	<p>As per response to Key Issue no. 2.</p>

<b>SUBMISSION 22: National Roads Authority</b>		
<b>1. District Centres and Large Metropolitan Towns</b>		
<p>Contradictory nature of statements included within the Retail Strategy. Paragraph 7.10 refers to the need for a cautious approach to retail schemes within district centres yet paragraph 7.14 outlines that no district centre will have a greater comparison floorspace than Mahon.</p> <p>Authority recommends that a cautious approach should be taken to permitting significant retail schemes within the district centres and Large Metropolitan Towns in order to protect the primacy of the City Centre but also the national road network.</p>	<p>It is not considered that the guidance set out within paragraph 7.10 and 7.14 of the retail strategy <b>which relate to the distribution of comparison floorspace</b> <del>is</del>are contradictory. Any future applications for development in district centres will be required to demonstrate the requirement for additional retail floorspace based on an identified catchment area. The impact on any future development on the national road network will be taken into consideration as part of the development management process.</p> <p>There is an emphasis in the strategy on developing Cork City as the primary retail centre and on enhancing the vitality and viability of existing town and district centres.</p>	<p>No change recommended.</p>
<b>2. Retail Warehousing/Bulky Goods:</b>		
<p>Lack of reference to National Roads issues in Sections 7.28 to 7.30 of the retail strategy despite the car dependency element of these formats.</p>	<p>It is proposed to include reference to national roads issues within the Retail Strategy.</p>	<p><u><i>Proposed Amendments to Retail Strategy</i></u></p> <p>Include the following sentence in Paragraph 7.29 of the Retail Strategy:</p> <p><i>“The capacity assessment demonstrates that there is potential for additional retail warehouse development over the period of the strategy</i></p>

<p>Approach adopted within Sections 8.7.5 and 9.3.19 of the Joint Retail Strategy with respect to large scale retail warehouse development in excess of 6,000 sq.m. cap does not provide guidance for either the City and/or County Development Plan.</p> <p>Given the potential impact of such development proposals with a national/regional catchment on the national roads network guidance to specific sites would seem opportune rather than the</p>	<p>Chapter 9 of the Retail Study sets out guidance for assessing future retail developments. Paragraph 9.3.19 notes that applications for large scale retail warehouses will be subject to compliance with the criteria set out within the Retail Planning Guidelines for assessing this format of development. The criteria listed in the 2012 Retail Planning Guidelines for assessing this format of development specifically refers to compliance with Planning Guidelines on Spatial Planning and National Roads.</p> <p>It is considered that a review of potential sites to accommodate the identified large scale retail warehouse developments should be carried out as a separate assessment by Cork City and County Council. It is beyond the scope of the retail study to undertake such an assessment.</p> <p>The impact on the national road network will depend on the scale and location of any significant proposal and it is not realistic to seek to address this proposal in a Metropolitan wide</p>	<p>(57,555 sq.m. by 2022). The key consideration in determining the distribution of this floorspace will be the appropriate and sustainable location for such retail activity. <b><u>Proposals for large scale retail warehouse floorspace should be in accordance with Planning Guidelines on Spatial Planning and National Roads</u></b>.</p> <p><u>Proposed Amendments to Retail Study</u> No changes required.</p> <p>No change recommended in respect of the potential location of such a development.</p> <p>No change recommended.</p>
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development management approach as endorsed by the Retail Study.	study. It is noted that "large format" can be any size over 6,000 sq.m. and could include extension to existing retail warehouse units.	
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**4.0 RESPONSE TO POINTS RAISED BY CORK CITY COUNCIL AND CORK COUNTY COUNCIL STRATEGIC PLANNING COMMITTEES**

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Issues Raised by Cork City Council Planning and Development Strategic Policy Committee at meeting on the 18 <sup>th</sup> of April 2013		
1. City Centre		
<p>Comparison shopping should be concentrated in the City Centre rather than the suburbs. Concern about impact of more comparison shopping in the suburbs on the City Centre.</p>	<p>The focus of the retail strategy is to promote the City Centre as the primary location for comparison floorspace within the Metropolitan Area and the distribution of future comparison floorspace throughout the Metropolitan Area reflects the role and function of the City Centre as the primary retail centre within the Metropolitan Area.</p>	<p>No change recommended.</p>
<p>Parking is free in suburbs and costly in the City Centre. Scheme needed to make city centre parking cheaper e.g. voucher for cheaper parking if you spend money in shop.</p>	<p>The Policies and Actions for the City Centre as set out within Chapter 8 of the study sets out recommendations such as the establishment of a City Centre Forum to review parking charges in the City Centre. The study sets the baseline for this point to be considered in further detail.</p>	<p>No change recommended.</p>
<p>View expressed that there should be more convenience shopping in the city centre, because so much of it has gone out to the suburbs. Others were concerned about the impact of Discount Stores on other businesses in the City centre and elsewhere.</p>	<p>The distribution of future convenience floorspace throughout the study area is based on targeted population growth. This approach advocates growth in convenience floorspace within the City in line with future population projects set out within the Regional Planning Guidelines for the South West Region.</p>	<p>No change recommended.</p>
<p>North Main Street is suffering and there is a need to redress the balance in its favour.</p>	<p>The retail study recognises the need for additional public realm improvements to North Main Street and a number of opportunity sites are designated</p>	<p>No change recommended.</p>

	within North Main Street.	
2. Turnover Ratios		
Table 6.11 on page 96 was queried in relation to how the spend would be allocated between stores. Large format stores could take a bigger spend per m <sup>2</sup> and this may have consequences for accessibility and the ability of smaller stores to compete. There was a view expressed that the 2008 document addressed this issue. (CSRS 2008 6.1.19).	See Response to Key Issue 1.	As per response to Key Issue 1.
3. Ballyvolane		
A co-ordinated approach was advocated in relation to the development of additional space at Ballyvolane. Concern was expressed about impact of proposals on the Glen River.	The approach to Ballyvolane as set out within the draft retail strategy and study which advocates a co-ordinated between the City and County Council in terms of the future planning of the district centre.	No change recommended.
4. Neighbourhood Centres		
It was proposed that an extra neighbourhood centre be added in Table 4.1 at Jacobs Island in Mahon.  It was proposed that the reference to neighbourhood centres serving a catchment area of approximately 10 minutes walking distance be removed. Query as to why a walking catchment was used when only small numbers of people walk and most drive for convenience shopping.	See Response to Key Issue 2.	As per response to Key Issue 2.
5. Local Corner Shops		
Local corner shops need to be protected from competition from bigger stores and chain stores.	It is not the purpose of the planning system to inhibit competition or protect existing commercial interests. In accordance with	No change recommended.

	<p>national guidance the approach set out within the Retail Study aims to protect the vitality and viability of existing town centres.</p>	
<p>6. Internet Trends</p>		
<p>There was a concern that internet retailing has been largely ignored in the study</p>	<p>Limited published information is available on the quantum of sales which are undertaken online or the potential impact of internet trends on town/city centre retailing. Chapter 3 specifically refers to online shopping as a key trend which may impact on the retail environment in the future. The household survey undertaken to inform the retail study included specific questions to obtain information on internet trends within the catchment area. <del>However this did not emerge as a significant trend.</del> <b>While more information has recently become available on internet retail trends in other European countries as set out in the Mintel Report "E-Commerce Europe – July 2013" there is still an absence of reliable up to date data on the nature and extent of internet retailing in Ireland.</b></p> <p><b>However the retail study specifically identifies the need for such trends to be monitored over the lifetime of the study. Paragraph 10.2.14 of the study outlines that "it is recommended that expenditure data is regularly reviewed and adjusted over the lifetime of the study to account for any notable increase documented by the CSO or other verifiable sources in terms of internet sales expenditure and that the implications for retail floorspace requirements</b></p>	<p>No change recommended.</p>

	<p><i>are monitored</i>". However in response to this trend an additional scenario has been prepared for inclusion as an appendix of the retail strategy.</p>	
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Issues Raised by Cork County Council Planning and Development Strategic Policy Committee		
1. Turnover		
Turnover (sales density) estimates are based on the largest stores and average should be far less.	As per response to Key Issue 1.	See response to Key Issue 1.
2. Distribution of Floorspace		
Share of comparison floorspace for Metropolitan towns should be increased.	The distribution of comparison floorspace throughout the Metropolitan Area is based on existing market share and population projections as set out within the Regional Planning Guidelines for the South West Region.	No change recommended.
3. Policies for neighbourhood Centres and Local Centres		
Policies for level 4 and 5 in the settlement hierarchy should be identified separately for the purposes of clarity.	See response to Key Issue 2.	As per response to Key Issue 2.
4. Expenditure per Capita		
Expenditure basis for the Joint Retail Strategy is unclear.	Section 6.4 of the retail study sets out a clear basis for the estimates on expenditure per capita. The figures for expenditure per capita are based on the most up to date data available for the Annual Services Inquiry provided for the study by the CSO.	No change recommended.
5. Opportunity Sites		
Opportunity sites should be listed in section 5.2 and require an assessment to be carried out.	Full details of all identified opportunity sites are set out within Appendix 4 of the retail study. Chapter 5 of the retail study includes cross reference to this Appendix.	No change recommended.

6. Docklands		
Convenience retail development is being artificially restricted in areas in order to reserve space for expansion in the Docklands which may not occur.	The distribution of convenience floorspace throughout the Metropolitan Area is based on the population projections set out within the Regional Planning Guidelines for the South West Region. This approach is considered appropriate.	No change recommended.
7. Parking		
Cost and access to parking can be a disincentive to shoppers using City/Town centres rather than purpose designed retail developments. Overall approach needs to be included in retail strategy.	The issue of parking is addressed and highlighted within the Health Check Assessment and Policies and Actions Sections of the Retail Study. It is outside of the remit of the retail study to put in place a parking strategy for each centre.	No change recommended.
8. City Centre		
Concern that it is declining.  Needs to retain its status as the prime location for retail in the heart of the Region.  Main threat is the 4 suburban shopping centres.	The focus of the retail strategy is the promote the City Centre as the primary location for comparison floorspace within the Metropolitan Area and the distribution of future comparison floorspace throughout the Metropolitan Area reflects the role and function of the City Centre as the primary retail centre within the Metropolitan Area.	No change recommended.
9. Mahon		
Concern at the impact of the success of Mahon on the city and county. Uses are relocating from the city centre. Object to any further expansion of Mahon. Negative impact already being felt by adjoining centres and the city.	The retail strategy states that <i>"no significant expansion of comparison floorspace in Mahon is envisaged over the lifetime of the strategy"</i> .	No change recommended.



<p>10. Little Island</p>		
<p>Needs to be re-categorised in the Joint Retail Study 'Small Metropolitan Town'.</p> <p>Recognition of workforce population</p>	<p>The level of each settlement within the retail hierarchy reflects its role within the settlement hierarchy. Little Island currently accommodates less resident population and limited provision of convenience and comparison floorspace when compared with existing Level 3 centres. The designation within the retail hierarchy relates primarily to population base rather than employment base as retail expenditure is much more closely aligned with resident population than employment numbers.</p>	<p>No change recommended.</p>
<p>11. Ballyvolane</p>		
<p>Requirement for an 'Iconic' development as a centrepiece to the new neighbourhood.</p> <p>Importance of retail development here to the north side of the city.</p>	<p>As per response to Key Issue 5.</p>	<p>As per response to Key Issue 5.</p>