

Proposed Variation No. 2 of the Cork County Development Plan 2014, as varied

Section 13(4)(a) Chief Executive's Report

Variation No.2 (Retail Outlet Centres)

Amend Paragraph 7.10.5 Retail Outlet Centres (previously amended as part of Variation No. 1 of the County Development Plan 2014) to provide strategic planning policy support for the provision of a Retail Outlet Centre in the N25 Corridor sub catchment of the County Metropolitan Strategic Planning Area and include new paragraph 7.10.6 'Innovation in the County's Retail Offer

**Planning Policy Unit
20th December 2019**

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1. Introduction

Introduction and Background

- 1.1. Cork County Council (the Council) proposes to vary the Cork County Development Plan 2014, as varied (Variation Number 2).
- 1.2. In 2019 Cork County Council appointed consultants to carry out a Study on the Requirement for Retail Outlet Centre(s) in Metropolitan Cork.
- 1.3. This study is a high level strategic assessment of whether or not there is sufficient headroom to support the provision of a retail outlet centre in the Metropolitan Cork Area and if so to identify at a strategic level the sub catchment within Metropolitan Cork that is most suitable to accommodate such a facility. As part of this strategic assessment a number of sample potential sites were modelled in order to facilitate the carrying out of the strategic multi-criteria transport and retail assessment necessary to investigate the need and appropriateness of such a development in Metropolitan Cork.
- 1.4. The study has identified that there is scope and retail potential capacity to accommodate a retail outlet centre in Metropolitan Cork. Having assessed a number of potential locations within a number of sub catchments against a range of considerations including retail impact, tourism synergy, traffic, access and public transport it was concluded that the most appropriate location for a Retail Outlet Centre in Metropolitan Cork is the NE-2 sub catchment (N25).

Form and Content of the Variation

- 1.5. The text proposed in the variation is in addition to existing policy guidance on Retail Outlet Centres already contained in the plan as set out under Variation Number 1 of the Cork County Development Plan, 2014.
- 1.6. The proposed Variation outlines the Council's vision with regard to retail outlet centres and updates the existing text in the plan to clarify that a study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area has been concluded.
- 1.7. The proposed text outlines that on the basis of the study the Council are satisfied that there is capacity for a retail outlet centre in the Cork Metropolitan Area and that the Council are satisfied that such a proposal should not have an adverse impact upon the vitality and viability of other retail centres. It outlines briefly a short rationale for this conclusion.
- 1.8. The text also recognises that the provision of a Retail Outlet Centre can be a significant benefit to the Metropolitan economy and an important contributor to the life, vitality and attractiveness of Metropolitan Cork.
- 1.9. It outlines that a sub catchment analysis against a range of considerations including retail impact, tourism synergy, traffic, access and public transport concluded that the most appropriate location for a Retail Outlet Centre in Metropolitan Cork is the NE-2 sub catchment (N25).
- 1.10. The variation also proposes a new objective TCR 10-2 Retail Outlet Centre supporting the provision of a 'Retail Outlet Centre' in the County Metropolitan Strategic Planning Area NE-2 sub catchment (N25) as well as additional text supporting innovation in the County's retail offer.
- 1.11. The full text of proposed variation to the Cork County Development Plan 2014 is set out in **Appendix A** of this report and should be read in conjunction with the Cork County Development Plan 2014, as varied.

Environmental Reports

- 1.12. The proposed Variation has been considered in the context of the Habitats Directive, and Cork County Council is satisfied that the proposed amendment does not have the potential to give rise or contribute to negative impacts on any European Site. Accordingly, it is determined that there is no requirement for the proposed amendments to be subject to Appropriate Assessment.
- 1.13. Cork County Council has determined under Section 13K of the Planning & Development (Strategic Environmental Assessment) Regulations 2004 that the proposed variation is NOT likely to have significant effects on the environment.
- 1.14. A Strategic Environmental Assessment (**SEA**) Screening Report including Strategic Flood Risk Assessment (**SFRA**) and a Habitat Directive Assessment (**HDA**) Screening Report has been prepared in conjunction with this proposed amendment and are available online for inspection and download from the following website <http://www.corkcocodevplan.com/>
- 1.15. This report should be read in conjunction with Volume 1 Proposed Variation No. 2 to the Cork County Development Plan, 2014 and Volume 2 Environmental Reports on Proposed Variation No. 2 published on 25th October 2019, which are available online for inspection and download from the following website <http://www.corkcocodevplan.com/>

Context

National and Regional

- 1.16. Cork Local Authorities joint submission to the National Planning Framework Cork 2050 – Realising the Full Potential advocated maximising the resource that is Metropolitan Cork. This vision focused on the designation of Cork as a ‘Regional Driver’ vital to Ireland’s success and long-term growth strategy.
This Strategy sets out the whole of Cork’s compelling proposition as a place that offers a competitive economy and a high quality of life, alongside a broad choice of lifestyles and locations.
- 1.17. The provision of a Retail Outlet Centre in the right location can be a significant benefit to the Metropolitan economy and an important contributor to the life, vitality and attractiveness of Metropolitan Cork as well as an important asset to the wider southern region.
- 1.18. This is further supported in the Draft Regional Spatial and Economic Strategy which states that “Metropolitan Cork has critical mass and is an emerging international centre of scale driven by the State’s second city of Cork at the core supported by a network metropolitan towns and strategic employment locations. Metropolitan Cork is a national primary driver and engine of economic and population growth and the principle complementary location to Dublin”. Therefore the Cork Metropolitan Area must be allowed to set out a policy framework to attract the types of development which will help to achieve the aims set out in the NPF and the Draft RSES.

Local

- 1.19. The proposed Variation sets out to provide high level strategic policy guidance for the consideration of a retail outlet centre proposal within the Metropolitan Cork sub catchment area identified as the most suitable for the consideration of such a development having regard to the National Planning Framework, Southern Regional Assembly Regional Spatial and Economic Strategy, the Guidelines for Planning Authorities-Retail Planning, April 2012 and the Spatial Planning and National Roads Guidelines, January 2012. Both this proposed Variation and previous

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Variation No.1 have included the key requirements of the above documents and any specific proposal emerging would be assessed in accordance with them.

- 1.20. The Council's Vision for Retail Outlet Centres which forms part of this proposed Variation is as follows;
"Facilitate an innovative competitive comparison retail outlet centre serving a regional catchment that is sustainably located, which provides synergies with tourism attractions and existing urban areas, avails of existing and planned public transport, does not give rise to traffic congestion, and does not have any adverse effects upon the vitality and viability of existing retailing centre"
- 1.21. The Proposed Variation and accompanying Study when combined with the previous Variation No. 1 provides a strong evidence based planning justification for the need for a retail outlet centre and that the most appropriate location for such a centre is within the N25 sub catchment.
- 1.22. It should be noted that Cork City Council and Cork County Council originally agreed to carry out a Joint Study on Retail Outlet Centres. Cork City Council had a significant input into both the preparation of the Study's Terms of Reference and the Inception Report. Cork City Council subsequently withdrew from the study on the grounds that they were going to commence a review of the Cork City Centre's Retail Strategy and that review might conflict with the retail outlet centre study and delay it.

Key Findings of the Study

- 1.23. The conclusions of the study are summarised below and provide an overall assessment of
 - Retail need and impact
 - The role of tourism and leisure
 - Traffic, transport and access
 - Potential sites and locations
- 1.24. The conclusions drawn relate to a generic ROC and have been informed by retail and transport assessments.

Retail Need

- 1.25. The study indicates that there is scope and comparison retail capacity to accommodate a quantum of additional comparison retail floorspace within the CMA and region at 2023. The study illustrates through the Annual Services Inquiry that online shopping continued to hit comparison expenditure available for the high street. The capacity assessment concludes that there is a requirement for between 90,000 and 100,000 sq.m. of net retail comparison floor area up to 2023 within the wider catchment. The generic proposed development would account for approximately 13,500sq.m of this demand. There is however only capacity for one such outlet in the CMA.
- 1.26. This indicates need from a planning perspective. There is also market need for a ROC. As illustrated in the case-studies, there is a wide range models focusing on different niches in the market. The higher end ROCs tend to focus almost exclusively on fashionwear. However, there are other formats, which place a greater emphasis on a blended offer of fashionwear, food and beverage, other comparison goods, and leisure facilities such as cinemas and music venues. The success, and indeed impact, of the ROC is dependent upon the precise format chosen or proposed. As this study only takes a generic format/model for the purposes of policy and impact assessment, it is not possible to assess a specific operator's model.

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- 1.27. Cork City Centre is the principal centre for higher order comparison shopping in the region and this is reflected in its position at the top of the hierarchy. It provides a wide range of higher order fashion outlets ranging from department stores to branded high street stores including Next, Dorothy Perkins and River Island. Cork City Council has indicated vacancy rates of between 9-11% on a number of primary shopping streets. The retail impact assessment for the ROC indicates a cumulative retail impact of between 0.3% and 1.0% depending upon the location of the ROC and the capacity to draw additional tourism expenditure from outside of the catchment. This is a reflection of the relatively modest scale of the ROC (13,500 sqm net sales area) relative to the overall size of Cork City Centre (93,058sqm including pipeline). This would indicate a negligible impact upon the trading conditions of the city centre.
- 1.28. The impacts are dependent upon strictly controlling the nature and type of goods sold to ensure that they are end of season and not in direct competition with high street traders in the city centre. It should also be noted that the larger the ROC, the greater the impact and potential for providing an alternative destination with associated local leisure activities. This assessment is only undertaken on the basis of a ROC of limited but viable size. The trade impacts are limited by growth in productivity of floor space. If these do not materialise over the period, there will be a greater impact, but still limited in extent. On this basis a ROC should not have an adverse impact upon the vitality and viability of the Cork City Centre, particularly for those locations more distant from the main retail core of the city.
- 1.29. Other district centres and suburban centres such as Mahon, Blackpool, Douglas, Wilton and Ballincollig and the other main stand-alone town of Midleton generally offer middle order comparison retailing. As such the impact on them is less than for the city centre and they are generally not in direct competition with a ROC.
- 1.30. A ROC will draw trade from a wide catchment and this is illustrated in the catchment analysis. The impact over the wider area is dissipated and reflected in the weightings applied to the trade diversion. The ring towns within Cork would fall within the same category as the urban centres in the Cork Metropolitan Area, offering middle order comparison retailing. The ROC would not therefore be in direct competition.

Tourism and Leisure Synergy

- 1.31. Maximising the opportunities for synergies with tourism attractions is important in maximising the economic benefits and minimising any impact upon the vitality and viability of existing centres, particularly Cork City Centre. The profile of the operator cannot be considered in the assessment undertaken as part of this study, but undoubtedly the type of operator will determine the attractiveness or otherwise to tourists visiting the area.
- 1.32. ROC formats can also have significant synergies with leisure, restaurants, cafes. Such leisure activities are often associated with resident, as opposed to tourism, expenditure and therefore there is greater potential for trade diversion and impact upon existing centres. The impact upon trade diversion will be limited where the synergies relate to already existing leisure facilities, rather than the creation of significant new leisure accommodation directly associated with the ROC itself.

Traffic and Transport

- 1.33. From the transport planning perspective, ensuring high quality accessibility to the ROC by various modes of transport should be considered essential in order to enable easy access from various locations within its large catchment, while encouraging and promoting sustainable mobility. To achieve this, the ROC should be well connected to the strategic road network by road links with

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sufficient capacity to accommodate the increased traffic demand even during peak times, while also being served by multiple high-frequency public transport services. Integration of the ROC within or adjacent to an existing or proposed public transport hub would offer the strongest opportunities to maximise the role of public transport in serving both customer and staff travel demands.

- 1.34. In terms of staff travel demand, reducing travel distances in the first place by locating the development close to an urban area with a large residential population (offering the potential for staff to walk or cycle) and serving the remaining commuting demand by public transport are two key sustainable transport objectives. To enable sustainable access by staff, a site should ideally be well linked to broader pedestrian and cycle infrastructure serving its local catchment.
- 1.35. In respect to the above characteristics, each of the assessed sites brings an individual set of advantages and challenges, whose details have been set out in tabular format within Section 8.3. of the Study.

Sites and Locations

- 1.36. A total 3 sites/locations were assessed in the final published study. These were selected for the purposes of assessing the impact of a ROC in traffic and retailing terms. The assessment indicated a varying performance of the potential locations. Consideration of those to be brought forward and reflected in the development plan will be a matter for the statutory planning process. The Retail Planning Guidelines advocate a sequential approach to testing of appropriate sites.

Next Stage

- 1.37. This Variation builds on the previous Variation No.1 which set out clearly the development management criteria that would need to be taken into account in assessing any future proposal for a retail outlet centre and which identified the need to provide additional strategic guidance.
- 1.38. The proposed Variation is the next stage in this process as it provides the evidence base firstly for the requirement/capacity for such a facility and secondly the sub catchment within Metropolitan Cork that would be best able to accommodate such a facility having regard to all the various considerations.
- 1.39. This Variation provides further policy guidance on top of that already provided for under Variation No.1 for consideration of retail outlet centre proposals. Variation No.1 and the current proposed Variation will provide high level policy framework to guide consideration of future proposals for retail outlet centres. Further policy guidance will be required in order to deal with more site specific considerations.
- 1.40. As part of the Cork County Development Plan Review Cork County Council will be preparing a Draft Joint Retail Strategy covering the City and the County. This Strategy will inform the policies and objectives of the relevant Draft City and County Development Plans due to be published in 2021. The study prepared to support Variation No.2 will help to inform the preparation of the Retail Outlet Centre part of that Draft Joint Retail Strategy.
- 1.41. The Cork County Development Plan Review will include a review of the current land use zoning provisions set out in the current Municipal District Local Area Plans. Therefore there will be an opportunity to reflect the specific outcomes of the Draft Joint Retail Strategy where appropriate. This will allow for a comprehensive policy response at both the strategic and local site specific level as required.

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- 1.42. Therefore the issue of retail outlet centres will be given further policy consideration as part of the upcoming County Development Plan Review and the accompanying Joint Retail Strategy. This work will inform the policy to be set out in the Draft County Development Plan and articulate in further detail the policies set out in this proposed Variation and Variation No.1. The study prepared to support the current Variation will be used as an input into the future work taking place as part of the County Development Plan Review. Once the County Development Plan and accompanying Joint Retail Strategy are adopted they will provide the policy framework for the assessment of any future planning applications for retail outlet centres.

Next Steps in the Statutory Process

- 1.43. This report will be circulated to all members of the Council for their consideration on Friday 20th December 2019. It is the intention that this Proposed Variation No. 2 to the Cork County Development Plan, 2014 as amended, will be brought before the full Council Meeting to be held on Monday 27th January 2020 for adoption. The adopted Variation to the Cork County Development Plan, 2014 comes into effect the day the Variation is made, i.e. on Monday 27th January 2020.

2. Principle Issues Raised

- 2.1. In all, a total of 43 submissions were received on Proposed Variation No. 2 to the Cork County Development Plan, 2014, as varied, during the statutory public consultation period.
- 2.2. This section of the report details the key issues arising from the submissions received in response to the public consultation process.
- 2.3. In addition to the general public, submissions were received from the following Government Departments and Statutory Consultees:
 - Office of the Planning Regulator
 - Southern Regional Assembly
 - Department of Education and Skills
 - Environmental Protection Agency
 - National Transport Authority
 - Office of Public Works
 - Transport Infrastructure Ireland
 - Cork City Council
 - Waterford City and County Council
- 2.4. Summaries of the issues raised in the submissions, and the Chief Executive's Response are included in **Appendix B** of this report. The key issues raised in the submissions are set out below and the Chief Executive's Response to these issues is given in this section. The key issues are considered to be the following:

Issue 1: Issues raised by the Office of the Planning Regulator

General

- 2.5. The Office of the Planning Regulator has raised a number of issues and the Chief Executives response is set out as follows:

Requirement for Retail Outlet Centre in the Cork Metropolitan Area

- 2.6. Cork County Council is satisfied based on the study findings that there is a requirement for between 90,000 and 100,000 sq.m. of net retail comparison floor area up to 2023 within the wider catchment. The generic proposed retail outlet development would account for approximately 13,500sq.m of this demand. There is however only capacity for one such outlet in the Cork Metropolitan Area. The Study indicates that the cumulative retail impact of a retail outlet centre on Cork City Centre, the District Centres and the Metropolitan Towns would be 0.5% or less.

Context for Variation No.1

- 2.7. The OPR in their submission states that "Variation No.1 of the Cork County Development Plan as adopted after statutory consultation with the Department of Housing Planning and Local Government addressed retail outlet developments. Variation No.1 provided for a detailed evidence based assessment to identify potential suitable locations for retail outlet developments derived appropriately from the requirements of the Retail Planning Guidelines for Planning Authorities (2012). The proposed Variation No.2 proposes to remove the above requirement and inserting a general presumption for such development in a catchment along the N25 corridor"
- 2.8. Cork County Council is satisfied that Variation No.2 does not in itself facilitate planning applications for a Retail Outlet Centre and that further policy support would be required before a planning

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application on any particular location could be considered within the N25 sub catchment. It is only at that stage would particular sites be identified. Therefore there may be opportunities during the County Development Review to consider suitable locations in more detail.

Compliance with Guidelines

- 2.9. Cork County Council is satisfied that Proposed Variations No.1 and No.2 of the CDP, 2014 when read together are in compliance with the Retail Planning Guidelines for Planning Authorities (2012). Variation No.1 and the current Variation when taken together have taken account of the relevant Sections of the Retail Planning Guidelines and in fact significant portions of the guidelines text has been incorporated directly into the Variations.
- 2.10. Also it should be noted that the Department of Housing, Planning and Local Government in their observations on Variation No. 1 of the Cork County Development Plan (24th November 2017) did not raise any issue with the proposed Variation No.1 in relation to retail outlet centres as regards compliance with the Retail Planning Guidelines.

A Proactive and Plan Led Approach

- 2.11. The Guidelines advocate a proactive approach in facilitating the meeting of retailing needs in line with a proper evidence base for that need. Cork County Council has sought to be proactive in particular by:
- Ensuring that retail development is plan-led, hence the commissioning of the Retail Outlet Centre Study.
 - That there is a strong planning policy basis for this proposed Variation No.2.
- 2.12. Cork County Council is strongly of the view that this proposed Variation lays a firm evidence base for plan led development following on from commitments made in the previous Variation No.1. It provides a strong evidence based framework at a strategic level to support the development of further policy initiatives.
- 2.13. The provision of a Retail Outlet Centre will be a significant benefit to the Metropolitan economy and an important contributor to the life, vitality and attractiveness of Metropolitan Cork as well as an important asset to the wider Southern Region.
- 2.14. Tourism and including cruise tourism plays a key role in the economy of the area. Tourism results in expenditure not originating from the population resident within the catchment, but rather from expenditure by visitors from outside the catchment. Tourism spend in ROCs is therefore important, as it ensures that the outlet is a destination in its own right, and not merely resulting in trade diversion from nearby centres. In the context of a ROC in the Cork Metropolitan Area, it is reasonable to assume a figure of 10% of trade will come from tourists. Maximising the opportunities for synergies between a retail outlet centre and other tourism attractions is important in order to maximise the economic benefits and minimise any impact upon the vitality and viability of existing centres particularly Cork City Centre.
- 2.15. This will help to support the Cork Metropolitan Areas role as identified in the NPF which sees Cork emerging as “an international centre of scale and is well placed to complement Dublin, but require significantly accelerated and urban focused growth to more fully achieve this role”.

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Role of Metropolitan Cork Nationally

- 2.16. The Cork Local Authorities joint submission to the National Planning Framework *Cork 2050 – Realising the Full Potential* advocated maximising the resource that is Metropolitan Cork. This vision focused on the designation of Cork as a ‘Regional Driver’ vital to Ireland’s success and long-term growth strategy.
- 2.17. This Strategy sets out the whole of Cork’s compelling proposition as a place that offers a competitive economy and a high quality of life, alongside a broad choice of lifestyles and locations.
- 2.18. The NPF states that “building on the potential of Cork is critical to further enhancing Ireland’s Metropolitan profile. This requires an ambitious vision for Cork, at the heart of which must be an internationally competitive, sustainable urban environment. This means providing housing, transport, amenities and energy systems in a best practice European context”
- 2.19. This Variation has been in development since 2017 and follows on from a commitment set out in Variation No. 1 of the Cork County Development Plan 2014. Although prepared in advance, the Study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area as well as the Variation No. 2 (when finalised) will be used to inform the preparation of any future Joint Retail Strategy which will inform the upcoming Development Plan Review process.
- 2.20. All relevant studies/strategies were taken into consideration in the preparation of the study and the proposed Variation. In particular the contents of the Draft Regional Spatial and Economic Strategy for the Southern Region and the Draft Cork Metropolitan Area Transport Strategy would not in any way alter the outcome of the study or the wording of the proposed Variation. The delivery of sustainable transport initiatives under Cork Metropolitan Area Transport Strategy will both strengthen the ability of the N25 sub catchment to accommodate such a proposal and support the delivery of this infrastructure.

Collaborative/Joint Approach

- 2.21. Cork County Council entered into this process in a collaborative manner with the intention of developing an evidence based plan led approach to providing clear policy guidance for consideration of a retail outlet centre in Metropolitan Cork.
- 2.22. As part of the Study preparation consultation was carried out with a range of key stakeholders:
- Engagement in two meetings with Cork City Council and written invitation to make a submission.
 - Both TII and the NTA were written to and informed of the study/project and requested to provide initial advice on potential issues and key considerations. A joint meeting was held to discuss the study.
 - The Cork Chamber of Commerce and Business Association and the Chambers of Commerce/Business Associations in all Main Towns in Metropolitan Cork were written to and asked to inform their members of the study/project with each requested to provide initial submissions as to the appropriateness or otherwise of the potential for a Retail Outlet Centre (ROC) or ROCs in the Cork Metropolitan Area.
- 2.23. The written responses are summarised in Appendix I of the Study.
- 2.24. It should be noted that Cork City Council and Cork County Council originally agreed to carry out a Joint Study on Retail Outlet Centres. Cork City Council had a significant input into both the preparation of the Study’s Terms of Reference and the Inception Report. Cork City Council subsequently withdrew from the study on the grounds that they were going to commence a review

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of the Cork City Centre's Retail Strategy and that review might conflict with the retail outlet centre study and delay it.

Safeguards

- 2.25. Cork County Council is satisfied that there are ample safeguards in the current Variation when merged alongside the previous Variation including references to the Retail Planning Guidelines, the Spatial Planning and National Roads Guidelines, the Joint Retail Strategy and the need to protect the national road network which addresses all the concerns raised. It should be noted that this Variation on its own or combined with Variation No. 1 will not facilitate specific planning applications. Instead it will provide further high level policy guidance which can be used as a basis for further policy formulation as part of the County Development Plan Review as necessary.

Specific Issues

Preferred content of statutory development plans in relation to retail planning

- 2.26. The proposed Variation along with previous Variation No.1 sets out a clear pathway to provide for high level strategic guidance, identifying the N25 corridor as the optimum sub catchment and the criteria to be used to assess any future retail outlet centre proposal.
- 2.27. The text of Variation No. 1 (Outlet Centres) adopted in 2018 and which is now included in the Development Plan sets out the relevant assessment criteria for retail outlet centres not previously included in the Joint Retail Strategy/Cork County Development Plan 2014.

Joint Retail Study (Section 3.5 of Retail Planning Guidelines)

- 2.28. In 2013, a Draft Metropolitan Cork Joint Retail Strategy was prepared to inform the development plan review process for both Cork Local Authorities. This complied with the requirements of Section 3.5 of the Retail Planning Guidelines. A new Metropolitan Cork Joint Retail Strategy has not been prepared to date as the relevant Development Plan Review process has not commenced.
- 2.29. Cork County Council sought to engage in a collaborative/joint approach to retail development in Metropolitan Cork. In 2013, a Draft Metropolitan Cork Joint Retail Strategy was prepared which has taken all the considerations as set out in Section 3.5 into account. The policies and objectives of the strategy were adopted into both Cork County and City Development Plans. Cork County Council sought to make good on the commitment set out in Variation No.1 and to deliver on a joint basis through the preparation of the Study and the proposed Variation No.2. The Study has accordingly taken into account the Joint Retail Strategy and relevant Development Plans. The outcome of this study has ultimately informed the proposed Variation.

Section 4.11.4 of the Guidelines address development management aspects to Outlet Centres

- 2.30. Adopted Variation No. 1 of the Cork County Development Plan makes direct reference to and is consistent with Section 4.11.4 of the Guidelines. Adopted Variation No. 1 sets out assessment criteria for retail outlet proposals including the need to comply with the Cork County Development Plan, Metropolitan Cork Joint Retail Strategy and the sequential test as set out in Chapter 4 of the Retail Planning Guidelines. The proposed Variation No.2 makes no suggestion that outlet centres should be permitted in more remote out-of-town locations. Section 4.11.4 of the Guidelines is in place to address development management aspects relating to Outlet Centres.
- 2.31. Adopted Variation No. 1, taking reference from the text of Section 4.11.4 concluded that locations in Metropolitan Cork emerged as appropriate for retail outlet centres on the basis of their commercial synergies. It also set out assessment criteria for retail outlet proposals. The Department of Housing Planning and Local Government in their submission on proposed Variation No. 1 of the Cork County

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Development Plan (24th November 2017) did not raise any issue with this approach or compliance with the Retail Planning Guidelines.

- 2.32. Proposed Variation No. 2 looks at the locational aspects on a catchment basis. As part of this strategic assessment a number of sample potential sites were modelled in order to facilitate the carrying out of the strategic multi-criteria transport and retail assessment necessary to investigate the need and appropriateness of such a development in Metropolitan Cork.
- 2.33. The sample locations chosen all fall within development boundaries and as such would not be considered remote out-of-town locations. The locations selected for assessment are not intended to be an exhaustive list and others may emerge within the sub-catchment which are also suitable for consideration.
- 2.34. Any future application for a retail outlet development will have to be assessed, taking into account the Retail Planning Guidelines Section 4.11.4, which in particular addresses specific development management aspects including the sequential test as well as the Variation itself.

Location Aspects - evidence based assessment

- 2.35. Text proposed in Variation No. 2 updates the existing text in the Plan (Variation No. 1) to clarify that a high level study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area has now been concluded. Having assessed a number of sample locations within a number of sub catchments against a range of considerations including retail impact, tourism synergy, traffic, access and public transport it was concluded that the most appropriate location for a Retail Outlet Centre in Metropolitan Cork is the NE-2 sub catchment (N25). Variation No.2 supports the provision of a retail outlet centre in this sub-catchment subject to further policy consideration.
- 2.36. The proposed Variation is not intended to be overly prescriptive in terms of location, indeed Section 3.5 of the guidelines states that Joint Retail Strategies are 'to identify broad guidance as to location and function of retail activity'. Acknowledging this and considering the strategic level of the proposed Variation locational guidance should not be overly specific.
- 2.37. Cork County Council is strongly of the view that this proposed Variation lays a firm evidence base for plan led development following on from commitments made in the previous variation. It would not be practicable or desirable to identify a specific location to the exclusion of other potential locations within the context of a strategic approach at this stage.

Updating of the Joint Retail Strategy

- 2.38. The Joint Retail Strategy prepared in 2013 was not updated to reflect policy guidance changes introduced in relation to retail outlet centres in both Municipal District Local Area Plans and the Cork County Development Plan 2014 in 2017 and 2018 respectively. The Study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area as well as the Variation No. 2 (when finalised) can be used to inform the preparation of any future Joint Retail Strategy which can inform the upcoming Development Plan Review process.

The Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

- 2.39. Any developments being proposed in the sub-catchment will need to demonstrate that the proposal is in accordance with the Planning Guidelines on Spatial Planning and National Roads. Adopted Variation No. 1 states that any proposal for an outlet centre must demonstrate that it:

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'is in accordance with the Planning Guidelines on Spatial Planning and National Roads in that the proposal can demonstrate that the development will not adversely affect the efficiency of the national road network and key junctions and interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads, taking account of the opportunities for encouraging a modal shift towards more sustainable travel modes;'

2.40. Cork County Council is satisfied that the proposed Variation No.2 complies with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

2.41. (a) Known capacity constraints on the National Road Network

The National Road network in Metropolitan Cork has known capacity constraints and this has been the case for an extended period at this stage. The provision of infrastructure lags significantly behind the demand for same and that situation is unlikely to change in the foreseeable future. One of the major constraints is at Dunkettle Interchange and this issue is likely to be addressed in the short term. Other capacity constraints particularly on the N40, N20 and the N25 have been under consideration for a significant period and are likely to be remediated over an extended period. It is also recognised that the solution to mobility in Metropolitan Cork is not restricted to road improvements alone. The Draft Cork Metropolitan Area Transportation Study (CMATS) is at an advanced stage and outlines a plan for mobility for Metropolitan Cork by all modes with a target year of 2040. It is important to acknowledge that the capacity constraints referred to are almost all peak period capacity issues. In the inter-peak period and in off-peak periods it is generally accepted that there is sufficient capacity in the National Road network.

2.42. (b) Mode Share Assumptions

A ROC provided in close proximity to a suburban rail station and a comprehensive cycle network as well as a regional bus service could be expected to perform much better than a 90% mode share. The 90% car mode share is a "worst case scenario" but one that could be improved significantly by appropriate design, local connectivity and travel demand management. Sustainable modes of travel are likely to be attractive to employees and this is an important consideration. The Draft CMATs will provide support for further sustainable transport infrastructure within the N25 sub catchment including enhanced rail services including additional rail stations at Water Rock, Dunkettle and Ballynoe, improved regional bus serves through Bus Connects with 10 minute frequencies and the roll out of the strategic cycle network.

2.43. (c) Other sub-catchments had lower forecast traffic impacts.

It is acknowledged that other sub-catchments performed better than the NE2 catchment when analysed at a high level for impact on the National Road network only. When other more localised factors such as likely impact on National Road Junctions, impact on local road network, availability of PT and availability of cycle networks are all taken into consideration, the NE2 catchment does, in fact, perform well.

2.44. The study assessment was carried out in two phases, firstly looking at road transport and then in the second phase the use of a multi-criteria analysis to determine the most appropriate location against a range of considerations including retail impact, tourism synergy, traffic, access and public transport. Therefore while the NW-2 and SW-4 sub catchments had lower forecast traffic impacts, when the multi criteria analysis was applied the N25 corridor emerged as the best option. It should be noted that sites in all three sub catchments were assessed during the process.

For further details see Issue 6: Traffic and Transportation Issues.

**Regional Spatial and Economic Strategy for the Southern Region/Cork Metropolitan Area
Transport Strategy**

- 2.45. The proposed Variation supports the delivery of the policies and objectives of the Regional Spatial and Economic Strategy for the Southern Region and the Cork Metropolitan Area Transport Strategy. The Variation will strengthen the already strong emphasis in the CMATS on the eastern rail corridor. A need for clear policy advice (lacking from the 2013 Joint Retail Strategy) was highlighted in 2017 and has prompted this Variation. Retail Outlet Centres are a unique type of retail category and this is recognised within the current Retail Planning Guidelines which treat them separately from more mainstream retail categories.
- 2.46. The proposed Variation follows on from Variation No. 1 and addresses commitments made in the previous Variation to carry out detailed evidence based assessment to confirm the need for such developments and to give more detailed locational advice.
- 2.47. The Study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area as well as the Variation No. 2 (when finalised) will be used to inform the preparation of any future Joint Retail Strategy which will inform the Development Plan review process.

Conclusion to the Office of Planning Regulator submission

- 2.48. Cork County Council is satisfied that Proposed Variations No.1 and No.2 of the CDP, 2014 when read together are in compliance with the Retail Planning Guidelines for Planning Authorities (2012). Variation No.1 and the current Variation when taken together are in compliance with Section 3 and Section 4.11.4 of the Retail Planning Guidelines and in fact significant portions of the guidelines text has been incorporated directly into the Variations. It is considered that the Study carried out provides a strong evidence based framework at a strategic level for consideration of any future policy proposals within Metropolitan Cork for Retail Outlet Centres.
- 2.49. The Study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area as well as the Variation No. 2 (when finalised) will be used to inform the preparation of any future Joint Retail Strategy which will inform the Development Plan Review process.
- 2.50. Cork County Council entered into this process in a collaborative manner with the intention of developing an evidence based plan led approach to providing clear policy guidance for consideration of a retail outlet centre in Metropolitan Cork. All relevant studies/strategies were taken into consideration in the preparation of the study and the proposed Variation. In particular the contents of the Draft Regional Spatial and Economic Strategy for the Southern Region or the Draft Cork Metropolitan Area Transport Strategy would not in any way alter the outcome of the study or the wording of the proposed Variation.
- 2.51. Cork County Council would consider that there are ample safeguards in the current Variation when taken with the previous Variation including references to the Retail Planning Guidelines, the Spatial Planning and National Roads Guidelines, the Joint Retail Strategy and the need to protect the national road network which addresses all the concerns raised.
- 2.52. This Variation and accompanying Study when combined with the previous Variation provide a strong evidence based planning justification for the need for a retail outlet centre and that the most appropriate location in Metropolitan Cork for such a centre is within the N25 sub catchment.

Issue 2 - Consistency with Retail Planning Guidelines, 2012

- 2.53. A number of submissions questioned whether the proposed variation is consistent with or might be contrary to the Retail Planning Guidelines, 2012 in particular:
- Need for statutory development plans to set out strategic guidance on the location and scale of retail development to support the settlement hierarchy, including where appropriate identifying opportunity sites.
 - That development plans identify relevant development management criteria for the assessment of retail developments – including need for proposed variation to state the need for assessment criteria against the Retail Planning Guidelines
 - The need to prepare joint or multi-authority retail strategies identifying broad requirements for additional retail floorspace development. Joint Retail Strategy has not been updated to address policy and locational aspects of planning for retail outlets.
 - Locational aspects for consideration – section 4.11.4. Outlet centres should not be permitted in more remote out-of-town locations.
 - The general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways.

Chief Executive's Response:

- 2.54. Cork County Council is satisfied that Proposed Variations No.1 and No.2 of the CDP, 2014 when read together are in compliance with the Retail Planning Guidelines for Planning Authorities (2012).
- 2.55. In 2013, a Draft Metropolitan Cork Joint Retail Strategy was prepared to inform the development plan review process for both Cork local authorities as required by Section 3.5 of the Retail Planning Guidelines.
- 2.56. The text of Variation No. 1 (Outlet Centres) adopted in 2018 and which is now included in the Development Plan set out additional text in relation to retail outlet centres (including relevant assessment criteria) which had not previously included in the Joint Retail Strategy/Cork County Development Plan 2014. The assessment criteria identified included the need to comply with the Cork County Development Plan, the Metropolitan Cork Joint Retail Strategy and the sequential test as set out in Chapter 4 of the Retail Planning Guidelines.
- 2.57. Variation No. 1 directly references and is consistent with Section 4.11.4 of the Guidelines concluding that locations in Metropolitan Cork emerge as appropriate for retail outlet centres on the basis of their commercial synergies. The text of Variation No. 1 made a commitment to carry out a detailed evidence based assessment to confirm the need for retail outlet centres and to identify potential suitable locations.
- 2.58. Also it should be noted that the Department of Housing, Planning and Local Government in their observations on Variation No. 1 of the Cork County Development Plan (24th November 2017) did not raise any issue to the proposed Variation No.1 in relation to retail outlet centres as regards compliance with the Retail Planning Guidelines.
- 2.59. Text proposed in Variation No. 2 updates the existing text in the plan (Variation No. 1) to clarify that a study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area has now been concluded and that the most appropriate location for a retail outlet centre in the Cork Metropolitan Area is the identified NE-2 sub catchment (N25).

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- 2.60. The proposed Variation along with previous Variation No.1 sets out a strong pathway to provide for high level strategic guidance, identifying the most suitable sub-catchment and what criteria would be used to assess any future retail outlet centre proposals. It should be noted that Section 4.11.4 of the Guidelines is in place to address development management aspects relating to Outlet Centres. It deals with the location of retail outlet centres in a broad sense.
- 2.61. Variation No.1 and the current Variation when taken together have taken account of the relevant Sections of the Retail Planning Guidelines and in fact significant portions of the guidelines text has been incorporated directly into the Variations. Both documents (as well as the background study) have been prepared giving due consideration to the Joint Retail Strategy for Metropolitan Cork.
- 2.62. It should be noted that:
- Although a Draft Metropolitan Cork Joint Retail Strategy was prepared in 2013, a new Metropolitan Cork Joint Retail Strategy has not been prepared to date as the relevant development plan review process has not commenced.
 - The proposed Variation nor Variation No. 1 make no suggestion that outlet centres should be permitted in more remote out-of-town locations, does not favour any specific sites within the sub catchment and stipulates that any development must not adversely affect the efficiency of the national road network, etc.

Issue 3: Alignment with National Planning Framework (National Policy)

- 2.63. A number of submissions questioned whether the variation conflicts with the core principles of the National Planning Framework in particular National Strategic Outcomes (framework goals) relating to compact growth/enhanced regional accessibility.

Chief Executive's Response:

- 2.64. Cork Local Authorities joint submission to the National Planning Framework *Cork 2050 – Realising the Full Potential* advocated maximising the resource that is Metropolitan Cork. This vision focused on the designation of Cork as a 'Regional Driver' vital to Ireland's success and long-term growth strategy. This Strategy sets out the whole of Cork's compelling proposition as a place that offers a competitive economy and a high quality of life, alongside a broad choice of lifestyles and locations.
- 2.65. In relation to the Cork Metropolitan Area it states that Cork is emerging as "an international centre of scale and is well placed to complement Dublin, but requires significantly accelerated growth to more fully achieve this role."
- 2.66. The NPF further adds that "building on the potential of Cork is critical to further enhancing Ireland's Metropolitan profile. This requires an ambitious vision for Cork, at the heart of which must be an internationally competitive, sustainable urban environment. This means providing housing, transport, amenities and energy systems in a best practice European context.
- 2.67. Retail development and potential are not explicitly identified/addressed in the NPF, a key emphasis is the principle of ensuring more compact and sustainable forms of development. Any development proposals will need to give due consideration to the NPF and accordingly the RSES and draft MASP.

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- 2.68. In relation to compliance with the NPF Cork County Council is satisfied that Metropolitan Cork represents the best location to provide for a retail outlet facility in a compact and connected location and that the identified N25 sub catchment offers the best opportunity to deliver this using the available and planned transport infrastructure (Strategic Outcome – Compact Growth).
- 2.69. Given that the ROC would have no material impact on a.m. peak periods and the at the p.m. peak impacts are likely to be of a scale that can be mitigated then an ROC in the NE2 corridor cannot be considered to be inconsistent with the stated Strategic Outcome 2 (Enhanced Regional Accessibility). For further detail see Issue 6: Traffic and Transportation Issues.
- 2.70. Cork County Council consider that there are ample safeguards in the current Variation when merged alongside the previous Variation including references to the guidelines, the joint retail strategy and the need to protect the national road network which addresses all the concerns raised.

Issue 4: Consistency with Regional Planning Guidance

South West Regional Planning Guidelines (SWRPGs) 2010

- 2.71. A number of submissions raised the issue of the need to demonstrate consistency of the proposed variation with the South West Regional Planning Guidelines (SWRPGs) in particular:
- Section 3.2.10 - City Centre is the primary comparison shopping centre of the region. The provision of additional comparison shopping should be located in the existing city centre (Cork) and town centres of the Cork Gateway and Hub towns.
 - Objective RES-02 - encourage sustainable retail development in the region principally focused on the city and towns of the Cork Gateway and Hub Towns.
 - Objective RSS-02 - sustainable development of the Cork Gateway as the economic driver of the region
 - Section 4.3.12 supports Cork City Centre as the primary location for retail services in the region. Section 4.3.14 supports the sustainable urban development of metropolitan towns.
 - RTS-02 - consolidation of growth in existing built up areas integrated with public transport provision. Local Authority planning policies should strive to protect the national road infrastructure for more strategic use.
 - It is noted that a revision/update to the Joint Retail Strategy is not proposed. The Joint Retail Strategy is important to ensure strategic level retail planning in the Cork Metropolitan Area is consistent with the objectives of the SW RPGs.

Chief Executive's Response:

As part of the Cork County Development Plan Review Cork County Council will be preparing a Draft Joint Retail Strategy covering the City and the County. This Strategy will inform the policies and objectives of the relevant Draft City and County Development Plans due to be published in 2021. The study prepared to support Variation No.2 will inform the preparation of the Retail Outlet Centre part of that Draft Joint Retail Strategy.

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- 2.72. It is considered that proposed Variation No. 2 is consistent with the South West Regional Planning Guidelines (SWRPGs). Proposed Variation No.2 does not deviate from the existing Joint Retail Strategy which recognises the primacy of the city centre for comparison retailing.
- 2.73. The vision expressed in the proposed Variation supports a retail outlet centre in Metropolitan Cork ‘serving a regional catchment that is sustainably located’. The provision of sustainably located retail development in the region focused on Metropolitan Cork is very much in line with the existing South West Regional Planning Guidelines supporting the consolidation of growth in existing built up areas integrated with public transport provision as opposed to more remote locations.

Draft Regional Spatial and Economic Strategy for the Southern Region

- 2.74. A number of submissions raised the issue of compliance with emerging regional guidance such as the Draft Regional Spatial and Economic Strategy for the Southern Region including the Draft Cork Metropolitan Area Strategic Plan including the following:
- Need to ensure that retail development is focused on urban centres with the application of a sequential approach to consideration of development which does not fall into this category.
 - Need for larger scaled, trip intensive developments such as retail to be primarily focused into central locations.
 - Need to manage capacity of the region’s strategic land transport networks for optimal use
 - Need for integrated land use and transport planning in Metropolitan Cork – Draft Cork Metropolitan Area Transport Strategy (CMATS).
 - Importance of the Joint Retail Strategy and the need to further prepare such retail strategies.
 - Future provision of retail to reaffirm the hierarchy of retail locations with the city centre at the heart of the metropolitan area.

Chief Executive’s Response:

- 2.75. It is considered that proposed Variation No. 2 is consistent with emerging regional level guidance.
- 2.76. Proposed Variation No. 2 does not deviate from the existing Joint Retail Strategy which recognises the primacy of the city centre for comparison retailing. The current retail hierarchy is focused on the existing settlement network within Metropolitan Cork while Variation No. 1 relating to retail outlet centres explicitly outlines that any proposal for an outlet centre must demonstrate compliance with the sequential test as set out in Chapter 4 of the Retail Planning Guidelines.
- 2.77. A retail outlet facility with a catchment as far away as Limerick, Clare, Tipperary and Waterford is considered to be a regional facility. Metropolitan Cork is in itself a sustainable location in which to locate retail development and the N25 sub catchment is considered to be the most suitable location.
- 2.78. Any future planning application for a retail outlet centre within the N25 sub catchment will need to demonstrate that it ‘will not adversely affect the efficiency of the national road network and key junctions and interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads, taking account of the opportunities for encouraging a modal shift towards more sustainable travel modes;’ as was set out in Variation No.1 of the Cork County Development Plan, 2014. Any such proposal would also be subject to a comprehensive Transport Impact Assessment. For further information see Issue 6: Traffic and Transportation.

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2.79. As part of the Cork County Development Plan Review Cork County Council will be preparing a Draft Joint Retail Strategy covering the City and the County. This Strategy will inform the policies and objectives of the relevant Draft City and County Development Plans due to be published in 2021. The study prepared to support Variation No.2 will help to inform the preparation of the Retail Outlet Centre part of that Draft Joint Retail Strategy.

Issue 5: Economic Benefits to Cork

2.80. A number of submissions indicated their support for a retail outlet centre in Metropolitan Cork. In particular identifying that it would be a great opportunity/asset for the Cork region, that it would have positive benefits for the Cork economy in terms of increased spending and attracting visitors/tourists.

Chief Executive's Response:

2.81. Significant economic benefits may be generated during the construction phase and the operational phase. The development of an ROC would:

- Contribute to Cork's long term strategic aims as set out in the NPF and the Draft RSES.
- Attracting significant visitors' numbers to Cork
- Generating additional bed nights for Cork
- Generating additional spending & Economic activity for Cork
- Generate a major new economic and tourism infrastructure.
- Complement existing infrastructure and a corridor-based approach to development.
- Be a unique and complementary addition to the growing range of visitor attractions in the Cork Metropolitan Area.
- Fill a long-standing gap in Cork's tourism infrastructure and complement Kildare Village.
- Shopping is an Increasingly Important Part of Tourism.
- Tourists spend twice as much on shopping as on sightseeing and entertainment.
- Retail tourism has become the fastest-growing product in the tourism sector
- ROC is entirely consistent with Growing Tourism in Cork - A Collective Strategy 2016-2020 which highlights the goal of increasing tourism revenue through the development of compelling visitor proposition based on the delivery of distinctive visitor-centric experiences, which include 'in places to shop'
- Introduce a unique experience to the Cork region and beyond, which will increase the revenues earned from tourism, and which will also help to increase source market diversity, and lengthen the season.

Issue 6: Traffic and Transportation Issues including capacity constraints on the N25/additional congestion

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2.82. A number of submissions raised issues relating to traffic and transport including;

- Regarding a lack of capacity on the N25 and related safety issues which could be exacerbated by a future retail outlet development.
- Inflated weightings given to public transport when 90% of visitors will be by car.
- Other sub-catchments had lower forecast traffic impacts.
- Contrary to the Spatial Planning and National Roads Guidelines for Planning Authorities, 2012, in particular that inappropriate forms of development should not erode the benefits of the National Road Network.

Chief Executive's Response:

Set out below is the Chief Executive's Reponse to the traffic and transportation issues raised in the submissions.

2.83. 1a) In the first instance emphasis needs to be placed on the attributes of a ROC which, despite its scale, can result in its impact on the receiving road network being reasonably benign. The road network in Metropolitan Cork, as with all urban road networks, is subject to two major peaks, one in the a.m. and the other in the p.m. on a 5 day week basis. This is generally caused by commuting to work and education. The a.m. peak is generally more acute and extends over a shorter time period but as travel demand grows both peaks are extending in terms of time. The analysis undertaken in support of this Variation has shown in Figure 6.4 and Figure 6.5 on page 58 that the likely impact of a ROC on the a.m. peak traffic period is negligible. This is because of the late opening time of a ROC. The same analysis shows that there will be a significant afternoon peak on weekdays and the largest peak anticipated will occur on Saturday mid afternoon. In the first instance these peaks are occurring during periods when there is capacity in the network. However, the nature of a ROC is that travel demand measures can be successfully applied in the form of financial penalties on parking with the aim of displacing the peak arrivals and departures to more suitable time period such as early afternoon or evening time. Given that a ROC is a discreet site where access and egress can be controlled, we can have confidence that travel demand management can successfully be applied there. Consequently we can say with confidence that the impact of a ROC, in these circumstance, on the national road network is not "inappropriate" and is one where the impacts can be mitigated.

2.84. 2. The policy of a general presumption against large retail centres located adjacent or close to existing, new or planned National Roads.(Same as 9. below)

(I) The ROC under consideration is a regional facility with a catchment as far away as Limerick, Clare, Tipperary and Waterford. Most trips will commence from locations where the most appropriate mode of travel to a ROC in Metropolitan Cork will be by car and consequently the fact that the highest mode share of trips to the ROC will be by car cannot be considered inappropriate.

(II) Trips from the vast majority of origins to a ROC in Metropolitan Cork will be via the National Road network as that is the primary means of connection between regions. Metropolitan Cork is well connected to the National Road Network comprising M8, N40, N25, N27, N29, N71, N22 and N20. Most of these roads have multiple junctions in Metropolitan Cork and consequently the greater part of Metropolitan Cork could be considered to be in proximity to a junction on a National Road.

(III) It can be concluded that the "general presumption against large out-of-town retail centres" is reasonable in areas outside metropolitan areas only. In the the current circumstance this

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presumption would not apply to a ROC in Metropolitan Cork as the NE2 corridor is not “out-of-town”, in the sense that the restriction could reasonably be applied.

2.85. **3.** Spatial Planning and National Roads Guidelines for Planning Authorities 2012 emphasise that inappropriate forms of development should not erode the benefits of the National Road network.

(a) Known capacity constraints on the National Road Network

The National Road network in Metropolitan Cork has known capacity constraints and this has been the case for an extended period at this stage. The provision of infrastructure lags significantly behind the demand for same and that situation is unlikely to change in the foreseeable future. One of the major constraints is at Dunkettle Interchange and this issue is likely to be addressed in the short term. Other capacity constraints particularly on the N40, N20 and the N25 have been under consideration for a significant period and are likely to be remediated over an extended period. It is also recognised that the solution to mobility in Metropolitan Cork is not restricted to road improvements alone. The Draft Cork Metropolitan Area Transportation Study (CMATS) is at an advanced stage and outlines a plan for mobility for Metropolitan Cork by all modes with a target year of 2040. It is important to acknowledge that the capacity constraints referred to are almost all peak period capacity issues. In the inter-peak period and in off-peak periods it is generally accepted that there is sufficient capacity in the National Road network.

2.86. Transport Infrastructure Ireland (TII) have tasked the National Roads Design Office (NRDO) with the following on the N25 corridor: N25 Carrigtohill to Midleton Upgrade. This project is listed in the National Development Plan and involves the upgrade of the N25 transport corridor between Carrigtohill and Midleton. It is likely to involve upgrade of the N25 between the Carrigtohill East Interchange and the Oatencake junction at Midleton. The NRDO have approval to progress this scheme from TII and appoint consultants for phases 1-4 (Concept and Feasibility up to Statutory Process). The consultants have now been procured and appointed. The project is commencing at Phase 1 Concept and Feasibility in January 2020. The timeframe for completion of Phases 1-4 up to and including the planning process is approximately 36 months.

(b) Mode Share Assumptions

A ROC provided in close proximity to a suburban rail station and a comprehensive cycle network as well as a regional bus service could be expected to perform much better than a 90% mode share. The 90% car mode share is a “worst case scenario” but one that could be improved significantly by appropriate design, local connectivity and travel demand management. Sustainable modes of travel are likely to be attractive to employees and this is an important consideration. The Draft CMATS will provide support for further sustainable transport infrastructure within the N25 sub catchment.

(c) Other sub-catchments had lower forecast traffic impacts.

It is acknowledged that other sub-catchments performed better than the NE2 catchment when analysed at a high level for impact on the National Road network only. When other more localised factors such as likely impact on National Road Junctions, impact on local road network, availability of public transport and availability of cycle networks are all taken into consideration, the NE2 catchment does, in fact, perform well, with the 3 locations considered outperforming other sites assessed in the N22 and N20 corridors.

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- 2.87. **4.** It is accepted in the analysis that the highest mode share use by visitors to the site will be by car and consequently a small mode share for access by public transport was assumed in the transport assessment. Response: This has been addressed at 3 (b) above
- 2.88. **5.** Siting of a mainly car based form of retail development near a national road, which already experiences significant levels of capacity constraint and which is liable to experience further substantial growth in demand on the basis of current development objectives within this part of Metropolitan Cork, should be reconsidered, based on its inconsistency with the National Planning Framework Strategic Outcome 2.
- (a) Response: Given that the ROC would have no material impact on a.m. peak periods and the at the p.m. peak impacts are likely to be of a scale that can be mitigated then an ROC in the NE2 corridor cannot be considered to be inconsistent with the stated Strategic Outcome 2(Enhanced Regional Accessibility).
- 2.89. **6.** Multi Criteria Analysis only assesses proximity to rail and ignores access to bus.
- (a) Response: All sub-catchments in Metropolitan Cork are served by a bus service. However, only some are served by suburban rail with stations in close proximity. In these circumstances it is considered reasonable to apply a premium to the presence of such a rail service.
- 2.90. **7.** Rail stations should be within walking distance of site to be effective. Given that accessibility from stations is not clear, it is difficult to justify high scoring.
- (a) Response: The Midleton Sub-Urban Rail line has stations at frequent intervals. Planning permission was granted in the recent past for an additional station at Carrigtwohill West and discussions are ongoing in relation to the planned station at Midleton West which is intended to serve much of the Waterrock development. With the addition of these stations, the walking catchment of the rail service will be significantly improved thereby giving greater access to rail from potential ROC sites.
- 2.91. **8.** Multi Criteria Analysis gives only 1-3 score for traffic impact while 1-5 is given to PT impact.
- (a) Response: The limited range of scores for traffic impact reflects the fact that all sub catchments experience some negative traffic impacts.
- 2.92. **9.** DoECGL Retail Planning Guidelines 2012 - "a general presumption against large out-of-town retail centres.
- (a) Response: Same as 2. above.
- 2.93. **10.** Lack of capacity and related safety issues on the N25 road:
- (a) Response: The demand for significant infrastructural improvements on the National Road Network in general in Metropolitan Cork and on the N25 in particular arises primarily from planned growth in housing, enterprise and employment as well as population growth in general in the catchment. The existing N25 also has long standing safety deficits that are in need of being addressed. The upgrade of the N25 is urgently required even in the absence of any proposal for a ROC in the catchment. Any alterations to proposals which are required to mitigate the impacts of a ROC are likely to be something that can be dealt with by means of a contribution from the ROC through the planning process.

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- 2.94. **11.** Strategic assessment indicated least impact on N20 corridor and greatest impact on N25 corridor.
- (a) Response: It is acknowledged that other sub-catchments performed better than the NE2 catchment when analysed at a high level for impact on the National Road network only. When other more localised factors such as likely impact on National Road Junctions, impact on local road network, availability of PT and availability of cycle networks are all taken into consideration, the NE2 catchment does, in fact, perform well.
- 2.95. **12.** Public Transport would only serve 7% of customers.
- (a) Response: Similar to 3.1 above, the 7% PT mode share was used in the high level strategic analysis based on experience with an existing site as detailed in 6.4.1 page 56 of the supporting report. This is not a performance target. A ROC provided in close proximity to a suburban rail station and a comprehensive cycle network as well as a regional bus service could be expected to perform much better than this. 90% car mode share is more likely to be a “worst case scenario” but one that could be improved significantly by appropriate design, local connectivity and travel demand management. Sustainable modes of travel are likely to be attractive to employees and this is an important consideration.
- 2.96. **13.** ROC has the potential to require alterations to existing or future National Roads Schemes:
- (a) Response: As summarised in 1. above, the impact of a ROC on the National Road network in itself is unlikely to give rise to the need for large scale infrastructural improvements. It is accepted that mitigation of impacts on the road junctions will be required and it would be reasonable to expect a significant contribution from a ROC to this type of work. The demand for significant infrastructural improvements on the National Road Network in general in Metropolitan Cork and on the N25 in particular arises primarily from planned growth in housing, enterprise and employment as well as population growth in general in the catchment.
- 2.97. **14.** Acknowledged impact on National Road Network in Cork area:
- (a) Response: As outlined at 1 above, the road impacts of a ROC have been considered to be impacts which can be mitigated and which will not have a detrimental effect on the National Road Network in Metropolitan Cork.
- 2.98. **15.** For each sub-catchment the forecasted traffic impact is a function of the percentage increase in traffic on the strategic road network resulting from the proposed ROC development. This metric has been weighted to reflect the impacts of the most congested sections of the model network based on baseline congestion level on these links. The N25 corridor, and by extension NE2, being well served by the strategic road network is suitability located for the development of a proposed ROC. While the model has identified challenges that may arise from a congestion perspective the tangible nature of these challenges, in that they can be addressed through infrastructural interventions and demand management strategies, provides a framework for a mitigation strategy which could be progressed.
- 2.99. **16.** While a 90% car share has been adopted based on the Kildare Tourist Outlet Village it is considered conservative for future scenarios as it doesn't acknowledge the significant potential of existing and proposed public transport infrastructure to deliver a greater move to more sustainable modes of transport. The strategic road network within the N25 corridor is complemented by an existing rail line, with associated connectivity to the Intercity network, the service on both lines of

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which Iarnród Éireann intend to intensify. In addition the existing regional bus service will be enhanced under the BusConnects programme with the introduction of an East Cork to City Centre service with a 10 minute frequency. This will be accompanied by a programme of associated infrastructural interventions by Cork County Council that will facilitate the roll out of an efficient service. Also on-going is the development of a strategic cycle network by Cork County Council which will provide connectivity for pedestrians and cyclists between Midleton, Carrigwohill, Little Island and the City Centre. While the latter will not deliver mass modal switch it has the potential to create capacity within the network by displacing traffic resulting from local trip, be they by customers or employees, and tourist trips.

Issue 7: Study Methodology

2.100. A number of submissions have questioned aspects of the methodology of the study in particular whether the study is a sound basis for concluding that the principle of a retail outlet centre in the Cork Metropolitan Area in general or in the selected location is acceptable either in terms of risk of impact on exiting city and town centres or in terms of sustainable access and traffic impact.

Chief Executive's Response:

2.101. Cork County Council is satisfied that this proposed Variation lays a firm evidence base for plan led development following on from commitments made in the previous variation. It provides a strong evidence based framework at a strategic level to support the development of further policy initiatives through the forthcoming County Development Plan Review. Note: Access and traffic impacts dealt with under Issue 6: Traffic and Transportation Issues.

2.102. The study adopted the following broad methodology using best available data and prepared by expert retail and transport consultants:

- A baseline review
- Catchment analysis for a ROC(s)
- Strategic transport impact assessment
- Assessment of need for a ROC
- Strategic location assessment and site selection
- Retail impact and site assessment

Catchment

2.103. The catchment of the proposed development has been established with regard to population distribution in the southwest of Ireland and the layout of the road network in the region. In identifying the catchment, special consideration was given to potential catchment overlap with KTOV, which is currently the only competitor of the proposed Cork ROC in the Republic of Ireland.

2.104. The catchment analysis has utilised forecast population data, received from the National Transport Authority (NTA). Such forecast data is consistent with the Draft Regional Spatial and Economic Strategy (RSES) for the Southern Region, and the analysis has been undertaken utilising geographic information systems (GIS) software.

Current trends in retail (including online)

2.105. The study provides an overview of the ROC sector in terms of evolution of the model and current development trends including a number of case studies. It sets the proposed Variation within this context.

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2.106. One of the requirements of the study was to consider the impact of online retailing. The Joint Retail Study only assumed that 1% of expenditure was affected and this was used as an assumption to 2022. Very few planning authorities have, to date, managed to quantify and qualify local residents' online spending. The review of literature and other surveys relating to internet shopping carried out as part of the study indicate that up to 13% of expenditure is directed to online shopping. There is a gap in how much is spent online and towards what types of good. General information suggests that it broadly include books, electrical goods and travel and concert tickets. The study has therefore taken an adjustment of an additional 5% for internet shopping which may be considered appropriate.

Existing vacancy/retail impact/trading conditions in the city centre

2.107. Vacancies are normal part of any functioning property market. Excessive levels of vacancy may be taken into account, but were not included within this strategic assessment, owing to a lack of survey information. The study did however note that Cork City Council has indicated vacancy rates of between 9-11% on a number of primary shopping streets but did not raise this as a significant issue.

2.108. According to the 2012 Joint Retail Study survey (table 4.2.3) the core retail area vacancy level in the City Centre (vacancy as a percentage of floorspace) was 18%. This would appear to indicate that there has been a considerable improvement in retail vacancy on primary shopping streets since 2012.

2.109. A somewhat higher than normal level of ongoing residual vacancy may be indicative of other factors for unoccupied floorspace in the city centre. It should also be noted that vacancy figures identify all vacant units within a town centre and such units could potentially be accommodated by a range of retail and non-retail uses including financial, service and other town centre uses.

2.110. The retail impact assessment modelled for a retail outlet centre (of limited but viable size) indicates a cumulative retail impact of between 0.3% and 1.0% depending upon the location of the ROC and the capacity to draw additional tourism expenditure from outside of the catchment. This would indicate a negligible impact upon the trading conditions of the city centre.

2.111. The impacts are dependent upon strictly controlling the nature and type of goods sold to ensure that they are end of season and not in direct competition with high street traders in the city centre. It should be noted that this requirement is also set out in the Retail Planning Guidelines as well as in Variation No.1 of the Cork County Development Plan 2014.

2.112. The trade impacts are limited by growth in productivity of floor space. If these do not materialise over the period, there will be a greater impact, but still limited in extent. On this basis, the study concludes that a ROC should not have an adverse impact upon the vitality and viability of the Cork City Centre, particularly for those locations more distant from the main retail core of the city.

2.113. Other district centres and suburban centres such as Mahon, Blackpool, Douglas, Wilton and Ballincollig generally offer middle order comparison retailing. As such the impact on them is less than for the city centre and they are generally not in direct competition with a ROC.

2.114. The tables in Appendix III illustrate that there is no direct impact when the design year and opening year are compared. Midleton, which is identified as a potential location, would directly benefit if selected as a location. This is reflected in the allocation of trade associated with the ROC.

Issue 8: Environmental/Climate Change Considerations

2.115. A number of submissions raised concerns that the proposed variation was promoting a form of development that could be considered environmentally unsustainable particularly given the car dependent nature of retail outlet facilities. It was also questioned whether the proposed variation was adequately dealing with climate change considerations.

Chief Executive's Response:

2.116. Retail Outlet Centres are an established retail format (Retail Planning Guidelines, 2012). Proposed Variation 2 set out a sustainable vision for a Retail Outlet Centres as follows:

“Facilitate an innovative competitive comparison retail outlet centre serving a regional catchment that is sustainably located, which provides synergies with tourism attractions and existing urban areas, avails of existing and planned public transport, does not give rise to traffic congestion, and does not have any adverse effects upon the vitality and viability of existing retailing centres.”

2.117. Although it is recognised that a Retail Outlet Centre is a regional facility it will undoubtedly serve a local demand. A significant proportion of Cork citizens already travel to Kildare Village Outlet Centre, via car, on a regular basis. This in itself can be considered unsustainable. A shopping destination in County Cork serving the South of Ireland reduces the need to travel long distances while also providing sustainable transport options for potential customers.

2.118. Unlike Kildare Village a ROC provided in close proximity to a suburban rail station and a comprehensive cycle network as well as a regional bus service could be expected to perform much better in terms of sustainable transport. Sustainable modes of travel are likely to be attractive to employees and this is an important consideration.

Metropolitan Transport Planning

2.119. The Draft Cork Metropolitan Area Transportation Study (CMATS) is at an advanced stage and outlines a plan for mobility for Metropolitan Cork by all modes with a target year of 2040. The plan generally envisages investment in all modes of transport with an emphasis on sustainable modes. It includes investment that will improve the service on the suburban rail and a significant investment in bus which includes on the N25 corridor. The plan also envisages the implementation of the Cork Cycle Network Plan which has identified significant opportunities for the provision of cycle networks in the N25 corridor linking Youghal to Cork City and all points in between.

Climate Change

2.120. The principle of locating a retail outlet centre in Metropolitan Cork has been in consideration since 2017. Addressing climate change is ever evolving and measures to address it will need to be further considered over the coming months/years. The core message in relation to land use planning set out within the Government's Climate Action Plan 2019 is to make growth less transport intensive through better planning to be delivered through key policies such as:

- The successful execution of the National Planning Framework designed to promote compact, connected and sustainable living.
- Expansion of walking, cycling and public transport to promote modal shift.

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2.121. Cork County Council is satisfied that Metropolitan Cork represents the best location to provide for a retail outlet facility in a compact and connected location and that the identified location NE2 offers the best opportunity to deliver this using available and planned transport infrastructure. The rail corridor is a major element in ensuring that any retail development at this location adopts a sustainable approach encouraging as much use of the facility as possible. It should also be noted that the government has ambitious plans to accelerate the take up of EV cars up to 2030.

2.122. Any future development proposal will need to demonstrate it can actively mitigate against threats posed by climate change as well as taking into account the criteria set out in the County Development Plan and any updated guidance/policies at that time. It should be noted that this variation does not identify any specific locations and does not facilitate a specific planning application. It is an action of the Cork County Council Climate Change Adaptation Strategy to ensure that climate change is considered in locating and planning future developments.

Issue 9: Content of the Strategic Environmental Assessment

2.123. A number of submissions questioned whether the Strategic Environmental Assessment is meaningful and whether it had adequately considered the proposal.

Chief Executive's Response:

2.124. The screening determination on SEA has been prepared in accordance with Article 13 K (4) of the Planning and Development Regulations 2001 (as amended) in particular Schedule 2A and any submissions or observations received from the prescribed environmental authorities. It is only significant environmental effects arising from changes to the Plan which are considered.

2.125. Consideration was also given to the fact that:

- The text proposed in the Variation is in addition to existing policy guidance on Retail Outlet Centres already contained in the plan as set out under Variation No.1 of the 2014 Cork County Development Plan.
- The existing Cork County Development Plan, 2014 and Variation No.1 has undergone full Strategic Environmental Assessment already.
- No individual sites are identified in the proposed variation and no change has been proposed to the zoning framework for the County as set out in the eight Municipal District Local Area Plans, 2017, as amended.

2.126. It is only significant environmental effects arising from changes to the Plan which are considered and this Variation proposes no change to the existing policies and objectives of the plan and no specific location/individual sites are identified. Any future plans that include project or location specific measures will be subject, as appropriate to the requirements of Strategic Environmental Assessment. The SEA screening report was issued to the prescribed environmental authorities including, the Environmental Protection Agency (EPA), the Minister for the Housing Planning and Local Government, the Minister for Communications Climate Action and Environment, the Minister for Agriculture Food and the Marine, the Minister for Culture, Heritage and the Gaeltacht pursuant to Article 13K (3)(a) of the Planning and Development Regulations 2001 (as amended).

2.127. The Environment Protection Agency in their submission on the Proposed Variation noted the determination of Cork County Council that Strategic Environmental Assessment is not required. The proposed Variation does not give rise to any strategic environmental concerns and having consulted with the Environmental Authorities it is determined that there is no requirement for them to be subject to Strategic Environmental Assessment.

Issue 10: Investment in existing town centres

2.128. A number of submissions objecting to the proposed Variation recommended that resources be better focused on investment in existing town centres.

Chief Executive's Response:

2.129. The Council have a long and proud track record of investing in the County's Town centres and is committed to enhancing retail and town centres both to the benefit of the wider region, drawing in additional expenditure and investment to the Cork area, as well rolling out town centres supports and initiatives such as placemaking. The Council are continuously seeking funding under the URDF and RRDF to help fund additional town centres enhancement projects.

Issue 11: Other issues

2.130. One submission sought a minor modification to the wording of the Proposed Variation to ensure that a planning application for an ROC on any of the NE2 sample locations identified in the Study would not be considered to be a material contravention

Chief Executive's Response:

2.131. It is not the intention of this Variation to facilitate an individual planning application. Cork County Council is strongly of the view that this proposed Variation lays a firm evidence base for plan led development at a strategic level to support the development of further policy initiatives through the forthcoming County Development Plan Review.

2.132. The proposal to alter the wording of the proposed objective TCR 10-2 by adding the following text to the end of the objective as follows: "... On lands zoned for business or enterprise use" as suggested would be considered to be a material change, could conflict with other objectives of the Cork County Development Plan namely Objectives ZU 3-5 Appropriate Uses in Enterprise Areas and ZU 3-6 Appropriate Uses in Business Areas. As stated above the aim of this Variation is to provide further high level policy guidance but not to facilitate the development of a specific site or sites.

3. Chief Executive's Recommendation

It is recommended that Proposed Variation No. 2 to the Cork County Development Plan, 2014, as amended is made as set out in Appendix A.

Appendix A: REVISED TEXT OF PROPOSED VARIATION NO. 2

1. Amend Paragraph 7.10.5 Retail Outlet Centres (previously amended as part of Variation No. 1 of the County Development Plan 2014) (Amended Text shown in **and Underlined**) as follows;

Outlet Centres

In relation to Retail Outlet Centres the Councils vision is to;

“Facilitate an innovative competitive comparison retail outlet centre serving a regional catchment that is sustainably located, which provides synergies with tourism attractions and existing urban centres ~~urban areas~~, avails of existing and planned public transport, does not give rise to traffic congestion, and does not have any adverse effects upon the vitality and viability of existing retailing centres.”

Section 4.11.4 of the Retail Planning Guidelines for Planning Authorities (2012) describes outlet centres as ‘groups of stores retailing end-of-season or discontinued items at discounted prices and are typically located in out-of-centre locations.’ Furthermore, the Retail Planning Guidelines highlight the following characteristics of outlet centres:

‘The success of these outlet centres depends on attracting customers from a wide catchment area, and from the tourism sector. When they are located out-of-town on greenfield sites, they can divert a significant amount of expenditure on comparison shopping goods away from established city/town centres and tourist centres even some distance away. Nonetheless, outlet centres within or immediately adjacent to a city or town centre can generate commercial synergies with the established retail outlets, thereby raising the profile of the centre and enhancing aggregate turnover on retail goods and leisure activities.’

‘It should be recognised, however, that outlet centres are unlikely to succeed commercially in close proximity to the main urban centres in Ireland because retailers do not normally choose to trade at a large discount in direct competition with their high street outlets. However, experience shows that this constraint is unlikely to arise with smaller or secondary town centres, especially those in areas which attract large numbers of tourists.’

Retail Planning Guidelines for Planning Authorities (2012)

Hence, having regard to the specific niche market that outlet centres operate within, applicants need to demonstrate that the products sold will not be in competition with those currently on sale in typical city/town centre locations. In addition, applicants can benefit from proposing a location that attracts large numbers of tourists.

Furthermore, potential locations of outlet centres should be such that they complement existing retail offerings / established tourist areas, and having regard to the foregoing, locations within Metropolitan Cork emerge as the most appropriate location to create those economic synergies.

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Any proposal for an outlet centre must demonstrate that the proposal meets the following criteria:

- will accommodate predominantly the retailing of end-of-season or discontinued items;
- demonstrate that the products sold will not be in competition with those currently on sale in typical city/town centre locations;
- demonstrate ability to reinforce existing tourism sector;
- the provisions of the Cork County Development Plan and Metropolitan Cork Joint Retail Strategy;
- the sequential test set out in chapter 4 of the Retail Planning Guidelines for Planning Authorities;
- is in accordance with the Planning Guidelines on Spatial Planning and National Roads in that the proposal can demonstrate that the development will not adversely affect the efficiency of the national road network and key junctions and interchanges and that it can be demonstrated that traffic volumes can be accommodated within the design assumptions for such roads, taking account of the opportunities for encouraging a modal shift towards more sustainable travel modes;
- will be served by existing or planned public transport services;
- will make adequate provision for private car use;
- will be accompanied by a traffic impact assessment, demonstrating compliance with the above criteria; and,
- will take account of the vitality/viability criteria in respect of city/town centres set out in the Retail Planning Guidelines for Planning Authorities (2012) and avoid the incorporation of uses and activities, as part of the development, which are more appropriate to city and town centre location.

~~Cork County Council will undertake a detailed evidence based assessment to confirm the need for such developments and which will identify potential suitable locations.~~

In 2019 Cork County Council appointed consultants to carry out a Study on the Requirement for a Retail Outlet Centre in the Cork Metropolitan Area. On the basis of the study's findings Cork County Council is satisfied that there is scope and retail potential capacity to accommodate a quantum of additional comparison retail floor space within the Cork Metropolitan Area and region up to 2023 of between 90,000 and 100,000 sq.m. of net retail comparison floor area. Therefore there is capacity to accommodate a Retail Outlet Centre in the Cork Metropolitan Area.

There are a variety of different Retail Outlet Centre formats and the success, and indeed impact of a Retail Outlet Centre is dependent upon the precise format chosen or proposed. The Council are satisfied such a proposal should not have an adverse impact upon the vitality and viability of other retail centres in Metropolitan Cork or the existing retail network/hierarchy as set out in Table 7.1.

The Study indicates that the cumulative retail impact of a retail outlet centre on Cork City Centre, the District Centres and the Metropolitan Towns would be 1% or less.

Metropolitan towns in particular generally offer middle order comparison retailing which is generally not in direct competition with the type of goods on offer in the typical Retail Outlet Centre format which seeks to attract customers from a wide catchment area and from the tourism sector. Furthermore there is a requirement on applicants to demonstrate that products sold will not be in competition with those currently on sale in typical city/town centre locations.

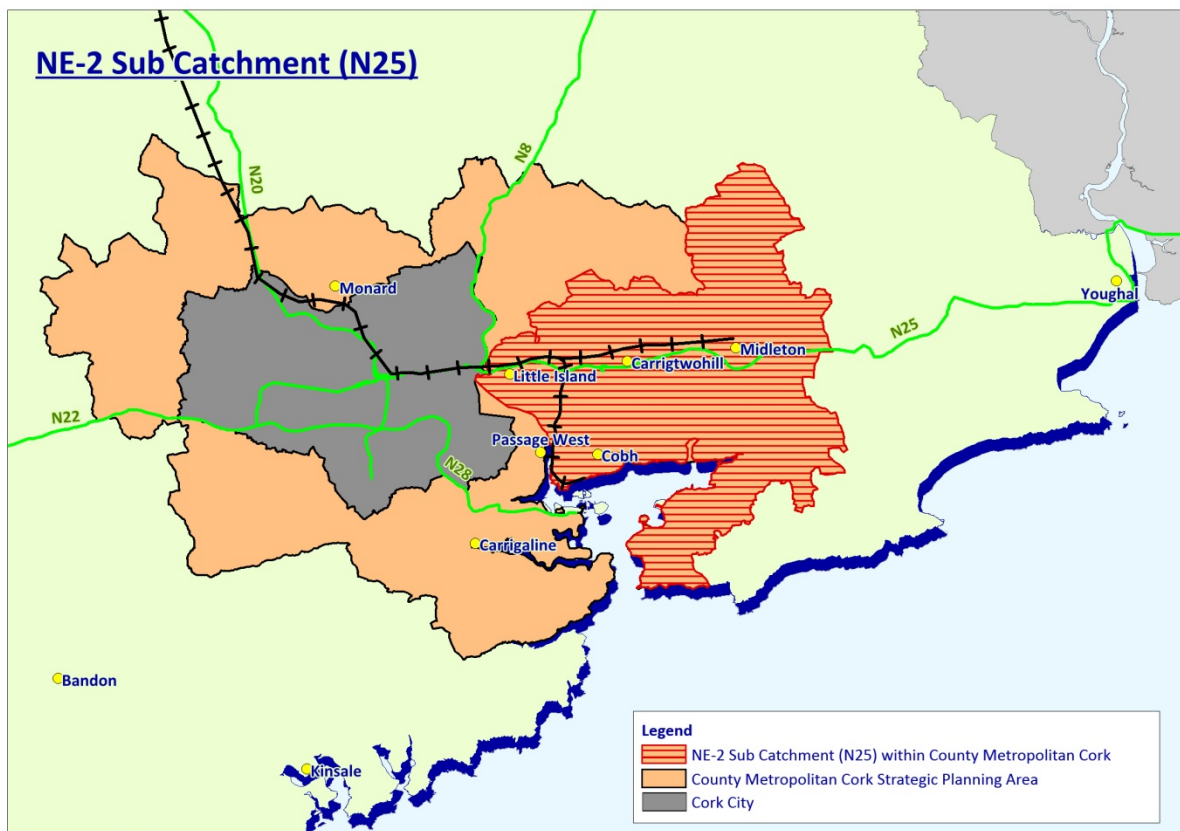
The provision of such a Retail Outlet Centre can be a significant benefit to the metropolitan economy and an important contributor to the life, vitality and attractiveness of Metropolitan Cork as well as an important asset to the wider southern region.

Having assessed a number of potential locations within a number of sub catchments against a range of considerations including retail impact, tourism synergy, traffic, access and public transport it was concluded that the most appropriate location for a Retail Outlet Centre in Metropolitan Cork is the NE-2 sub catchment (N25).

County Development Plan Objective

TCR 10-2: Retail Outlet Centre

Support the provision of a Retail Outlet Centre in the NE-2 sub catchment (N25) of the County Metropolitan Strategic Planning Area



Other Categories of Retail Development

Guidance in relation to other specific categories of retail development e.g. factory shops, retailing in small towns, rural areas and motor fuel stations where not specifically dealt with in this Plan shall be as outlined in the Retail Planning Guidelines

2. Insert new Section 7.10.6 Innovation in the County's Retail Offer as follows;

Innovation in the County's Retail Offer

To ensure that the county sustains and enhances its attraction and competitiveness as a retail destination, it must be proactive and responsive in respect of innovation in retailing and new retail market trends. Retailing is a key part of Cork County's tourism offer and, as such, is important to the county's economy as a whole. Encouraging and facilitating innovation, be that in trading format, location or product, will assist the county to build on the success that has been established to date and, consequently its retail profile and attraction.

Appendix B: Chief Executive’s Response and Recommendation to each submission received.

Name of Submitter and Submission Ref. Number	Summary of Issues Raised	Chief Executive’s Response
Office of the Planning Regulator VARROC158133 296	<p>Submission has considered the Retail Planning Guidelines for Planning Authorities (2012) in particular Sections 3, 3.5 and Table 1 and Section 4.11.4 in relation to Retail Outlet Centres.</p> <p>Section 3.5 of the Guidelines – authorities must prepare joint retail strategies identifying broad requirements for additional retail floorspace development, etc including taking into account the policy objectives of the guidelines in Section 2 and the relevant settlement hierarchy.</p> <p>Section 4.11.4 of the Guidelines address development management aspects to Outlet Centres particularly locational aspects highlighting that the most appropriate location for outlet centres is likely to be where commercial synergy can be achieved between an outlet centre and an urban centre which would lead to economic benefits for the overall area. Outlet centres should not be permitted in more remote out-of-town locations.</p> <p>Variation No.1 of the Cork County Development Plan provided for a detailed evidence based assessment to identify potential suitable locations. Variation No.2 proposes to remove the requirement and insert a general presumption for such development in a catchment along the N25 corridor.</p> <p>The Joint Retail Strategy has not been updated to address policy and locational aspects of planning for retail outlets. The draft Regional Spatial and Economic Strategy for the Southern Regional Assembly area refers to the preparation of an updated Joint Retail Strategy for the metropolitan region.</p> <p>The preferred sub-catchment is insufficiently specific in relation to locational aspects of outlet centre development, which could result in a risk of multiple or competing proposals that would be inconsistent with the intent of Section 4.11.4 of the above Guidelines and would be contrary to a plan-led approach.</p> <p>The Spatial Planning and National Roads Guidelines for Planning Authorities (2012) emphasise that inappropriate forms of development should not erode the benefits of the national road network. The retail study prepared to inform the proposed variation acknowledges that an outlet centre would be</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17.</p>

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	<p>essentially car-borne with a forecast that 90% of all shopping trips would be by private car, whereas there are known capacity constraints on the national road network within and around the sub-catchment preferred.</p> <p>Other sub-catchments identified in the study that informed Variation No.2 - namely NW-2 and SW-4 - had lower forecast traffic impacts and other locational attributes that were not subject to detailed assessment.</p> <p>A Transport Strategy for the Cork Metropolitan Area is in preparation on a collaborative basis between the National Transport Authority (lead), Cork City and County Councils and Transport Infrastructure Ireland.</p> <p>The relevant Development Plans will be subject to review taking account of the RSES and Transport Strategy for the Cork metropolitan area, such reviews would normally be anticipated to provide a clear policy framework for retail including retail outlet centre development specifically, including the identification of appropriate locations for such categories of development.</p> <p>Recommendation</p> <p>In order to ensure effective co-ordination of national, regional and local planning requirements by Cork County Council in the discharge of its development planning functions, the Office recommends not making Variation no. 2 as proposed because:</p> <p>I. The proposed variation is not consistent with the Retail Planning Guidelines for Planning Authorities (2012) and specifically Sections 3 and 4 and specifically Sections 3.5 Table 1 and 4.11.4, which has been referred to in Section 7.10.5 of the Cork County Development Plan 2014;</p> <p>and</p> <p>II. Would otherwise be premature to the preparation and finalisation of wider retail, spatial planning and transportation policies relevant to the implementation of the above guidelines and the securing of plan-led development in the interests of the proper planning and sustainable development of the area.</p>	

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Name of Submitter and Submission Ref. Number	Summary of Issues Raised	Chief Executive's Response
<p>Southern Regional Assembly VARROC158300 861</p>	<p>Consistency with the SW RPGs 2010-2022</p> <p>The proposed variation needs to demonstrate regard to the following objectives and content of the SW RPGs 2010-2022.</p> <p>Section 3.2.10 - City Centre is the primary comparison shopping centre of the region. The provision of additional comparison shopping should be located in the existing city centre (Cork) and town centres of the Cork Gateway and Hub towns.</p> <p>Objective RES-02 - encourage sustainable retail development in the region principally focused on the city and towns of the Cork Gateway and Hub Towns.</p> <p>Objective RSS-02 - sustainable development of the Cork Gateway as the economic driver of the region</p> <p>Section 4.3.12 supports Cork City Centre as the primary location for retail services in the region.</p> <p>Section 4.3.14 supports the sustainable urban development of metropolitan towns.</p> <p>RTS-02 - consolidation of growth in existing built up areas integrated with public transport provision. Local Authority planning policies should strive to protect the national road infrastructure for more strategic use.</p> <p>It is noted that a revision/update to the Joint Retail Strategy is not proposed. The Joint Retail Strategy is important to ensure strategic level retail planning in the Cork Metropolitan Area is consistent with the objectives of the SW RPGs.</p> <p>Variation No 2 in the Context of the Draft RSES</p> <p>Objectives as well as content under the RSES and Cork MASP have relevance for the proposed variation and should be noted. The following is a summary of some of the text/objectives highlighted.</p> <p>Chapter 4 – supports the retail sector as a significant part of the regional economy. Importance of retailing for tourists.</p> <p>RPO 53 - Ensure that retail development is focused on urban centres with the application of a sequential approach to consideration of development which does not fall into this category. It is an objective to prepare Joint Retail Strategies where applicable.</p> <p>RPO 146 - larger scaled, trip intensive developments</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 4: Consistency with Regional Planning Guidance, pages 20-22</p>

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	<p>such as retail should primarily be focused into central locations.</p> <p>RPO 150 - capacity and safety of the region's strategic land transport networks will be managed and enhanced for optimal use.</p> <p>Cork MASP Objective 7 - integrated land use and transport planning Objective 8 - Cork Metropolitan Area Transport Strategy (CMATS).</p> <p>Cork MASP Section 6.7 - Importance of Cork City and County Joint Retail Strategy. Need for a holistic future assessment of the retail needs between both Local Authorities. Important that future provision of retail reaffirms the hierarchy of retail locations with the city centre at the heart of the metropolitan area, a Tier 1 location.</p> <p>Cork MASP Objective 16 Retail - Support the role of Metropolitan Cork as a Level 1 location for retail provision and the retail hierarchy as identified in the Metropolitan Cork Joint Retail Strategy 2013. Support the role of the Metropolitan Cork Joint Retail Strategy and seek further preparation of joint retail strategies for Metropolitan Cork.</p> <p>Conclusion</p> <p>Proposed Variation No.2 needs to demonstrate consistency with the SW RPG's with respect to the new Objective TCR 10-2 Retail Outlet Centre. This objective does not specifically state the need for assessment of such locations against criteria such as the Retail Planning Guidelines, the criteria set out in existing Section 7.10.5, the Metropolitan Cork Joint Retail Strategy (and future reviews of that joint strategy) or the Cork Metropolitan Area Transport Strategy.</p> <p>The high-level support for the principle of a proposal within a particular sub-catchment should also reference the requirement for adherence to the assessment criteria, principals, relevant strategies and guidelines outlined above.</p> <p>Objectives under the RSES and Cork MASP have relevance for the proposed variation and should also be noted.</p>	
<p>Department of Education & Skills VARROC157849 094</p>	<p>The Department of Education & Skills has no comment.</p>	<p>Noted</p>

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Name of Submitter and Submission Ref. Number	Summary of Issues Raised	Chief Executive's Response
Environmental Protection Agency VARROC154225 846	Notes the determination that SEA is not required. Where changes to the plan are made prior to finalisation these should be screened for potential likely significant effects. The variation should also comply with the requirements of the Habitats Directive and Appropriate Assessment should be incorporated into the SEA and the Variation where required. Submission requests that a copy of the decision on determination regarding requirement for SEA is made available for public inspection and a copy sent to the relevant environmental authorities.	See response set out under Issue 9: Content of the SEA, page 31
Office of Public Works VARROC158096 397	OPW notes the determination that a Strategic Flood Risk Assessment was not required noting that no individual sites are identified in the proposed variation.	Noted
National Transport Authority VARROC158295 052	<p>The formulation of policy relating to retail outlet centres would be best undertaken as part of a review of the Metropolitan Cork Joint Retail Strategy/Development Plan review process to be undertaken by both local authorities. Recommendations of study would be better informed if this were the case.</p> <p>Identification of appropriate locations would be more appropriately based on a more extensive area than that of the Cork Metropolitan Area given the regional-level catchment. Although there were more preferable sites along the N20 these were ruled out on account of their being located outside of the Metropolitan Area.</p> <p>Concerned by the manner in which public transport accessibility was applied as part of the multi-criteria analysis used in the corridor selection process. Whilst the N25 corridor sub-catchment benefits from and the provision of public transport is preferable to serve new development, a mode share of only 7% has been assumed in the Study, for retail outlet centres, with a car mode share of 90%.</p> <p>The siting of a mainly car-based form of retail development on a national road, which already experiences significant levels of capacity constraint and which is liable to experience further substantial growth in demand should be reconsidered, based on its inconsistency with the NPF Strategic Outcome 2 and the Spatial Planning and National Roads Guidelines for Planning Authorities, 2012, which point to the general presumption against large out-of-town retail centres in particular those located adjacent or close to existing new or planned national roads/ motorways.</p>	See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27

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Name of Submitter and Submission Ref. Number	Summary of Issues Raised	Chief Executive's Response
<p>Transport Infrastructure Ireland VARROC158022 260</p>	<p>A. National Policy Framework</p> <p>The National Planning Framework indicates it is necessary to improve regional connectivity in tandem with targeted urban growth strategies for Cork, Limerick and Waterford - 'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancement.'</p> <p>The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities require that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road infrastructure.</p> <p>DoECLG Retail Planning Guidelines, 2012 - establish that there should be a general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways. Section 4.11.4 of the Retail Planning Guidelines; presumption against large out-of-town retail centres located adjacent or close to existing, new or planned national roads/motorways. No exception to this policy applied to "Outlet Centres".</p> <p>B. Existing National Road N25</p> <p>Cork Metropolitan Area is very reliant on the national road network which has a finite capacity with limited capacity for upgrading works. It is widely acknowledged that there are capacity constraints and safety concerns associated with the N25 corridor. Cork County Council is aware of these issues.</p> <p>C. Variation Issues & National Road Network</p> <p>The ranking system for sites carried out as part of the transport impact and multi-criteria analysis/corridor system "Study on the Requirement for Retail Outlet Centre(s) in the Cork Metropolitan Area" in the TII's opinion is fundamentally flawed for the following reasons:</p> <p>a) Sites along the N20 were ranked in the analysis as the most preferable location for a Retail Outlet Centre. It is considered that these areas should not have been ruled out without further investigation and consideration despite their location outside the Cork Metropolitan area.</p>	<p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27</p>

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	<p>b) While the provision of public transport is preferable to serve new development it represents circa 7% of the visitors to the ROC as indicated in Table 6.3. There is an acknowledged reliance of this form of development on vehicular access and in particular private car use. Therefore the potential to create an adverse impact on the national road network.</p> <p>Advise that given national planning policy related to the national road network and also existing documented capacity/safety issues on the N25 that the Strategic Location Assessment should not weight the provision of public transport at the same level of strategic road network impacts in assessment when 90% of visitors to the ROC will arrive by private car via the strategic road network.</p> <p>Three locations on the N25 corridor are considered in further detail by the document. It is noted that the assessment provided are only desktop based assessment and do not acknowledge the known constraints highlighted by Cork County Council's N25 Carrigtohill to Midleton Upgrade Scheme Project Appraisal Plan 2018, and a recent planning application refused by Cork County Council at Tullagreen (currently on appeal). These are important matters which should be considered given the acknowledged traffic constraints on the N25 corridor.</p> <p>D. Conclusion:</p> <p>The N25 should not be considered a preferable corridor for a Retail Outlet Centre as proposed by this variation, due to:</p> <ul style="list-style-type: none"> i. The requirements established in national policy related to national roads included in National Planning Framework (page 140 refers) and the National Development Plan 2018-2027 to maintain the capacity and safety related to national roads including planning for future capacity enhancement. ii. The requirement in Section 4.11.4 of the Retail Planning Guidelines, 2012, establish that there should be a general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways. iii. The existing known constraints on capacity and safety of the national road infrastructure within the area. iv. The variation does not appear to account for potential requirements to alter the existing national road or future schemes including the planned National Development Plan 2018-2027 N25 Carrigtohill to 	

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	<p>Midleton Scheme.</p> <p>v. The acknowledged creation of an adverse impact on the national road network in the Cork Metropolitan Region as indicated in supporting variation documentation "Study on the Requirement for Retail Outlet Centre(s) in the Cork Metropolitan Area".</p> <p>TII consider that the variation to promote a land use of a scale and typology such as a Retail Outlet Centre on the N25 corridor would impact adversely on capacity and safety of the N25 and associated junctions. In addition the variation can be considered to be premature pending the determination of a road layout (design) for the area or any part thereof to ensure enhanced regional accessibility as required by National Development Plan 2018-2027.</p>	
<p>Cork City Council VARROC158847 713</p>	<p>Primary concern relates to the potential negative impact that an outlet centre will have on the vibrancy of Cork City Centre, District Centres and other towns as set out in the retail hierarchy of the Joint Retail Strategy.</p> <p>Variation not aligned with local regional and national policy in relation to protecting the role of the city centre and town centres in Metropolitan Cork.</p> <p>Proposed variation appears to be contrary to the Retail Planning Guidelines 2012 which include:</p> <ul style="list-style-type: none"> • A presumption against large out of town retail centres, in particular those adjacent to existing or planned national roads; • An emphasis on enhancing the vitality and viability of city and town centres in all their functions with sequential development being an over-arching objective in retail planning. <p>Appears contrary to South West Regional Planning Guidelines which state that additional comparison shopping should be located in the existing city centre and town centres, a policy that is echoed in the draft Regional Spatial and Economic Strategy which supports the vitality and viability of town and city centres.</p> <p>Contrary to the main objectives of the Metropolitan Cork Joint Retail Strategy and agreed retail hierarchy which seeks to protect and enhance the role of Cork City Centre as the primary retail, particularly relating to higher order comparison goods as well as support the vitality and viability of the Metropolitan Towns.</p>	<p>See response set out under Issue 2 Consistency with Retail Planning Guidelines, pages 18-19.</p> <p>See response set out under Issue 3: Alignment with NPF, pages 19-20 and Issue 4: Consistency with Regional Planning Guidance, pages 20-22</p> <p>See response set out under Issue 2 Consistency with Retail Planning Guidelines, pages 18-19.</p> <p>See response set out under Issue 4: Consistency with Regional Planning Guidance, pages 20-22</p> <p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17</p>

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	<p>Case for sustainably located outlet centre without impact on other centres not adequately established.</p> <p>Study is not a sound basis for concluding that the principle of a retail outlet centre in the Cork metropolitan area in general nor a retail outlet centre in the selected location is acceptable.</p> <p>Study points to a possible negative impact on Cork city. Assumes that 35% of the Outlet Centre's trade will be diverted from the city centre.</p> <p>Role of the city centre and the potential impact on it are not referred to in the Variation, which is a serious omission in the context of agreed policy. Recommendations on the kind of assessment and conditions that would be imposed from the study have not been incorporated into the variation.</p> <p>Impact of changing dynamics in retail sector, such as online retailing, not fully taken into account.</p> <p>Assessment did not consider the potential vulnerability of retail as a result of increased vacancy and under trading evident in towns and villages throughout the catchment area.</p> <p>Variation assumes continued growth of in-store comparison retailing expenditure to justify an expectation that there will be significant demand for additional retail floorspace into the future.</p> <p>Expectation of a correlation between population/income growth and growth in floorspace is optimistic and dated in light of current retail trends.</p> <p>Catchment seems overly optimistic and it is likely that available expenditure and resultant floorspace will be lower than anticipated. Study does not consider other schemes that are known to be in the pipeline in catchment area and the assessment of the impact on existing towns and villages is not clear.</p>	<p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28. This has now been addressed as part of revised text included in the proposed variation. Any future development will need to take into consideration the requirements as set out in the Retail Planning Guidelines. Key criteria for consideration are already set out in Variation No. 1.</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p>

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	<p>Kildare town has received little or no benefit from its proximity to Kildare Village. This is contrary to the expectation in the study assessment which suggests that a centre on the N25 close to Midleton would bring significant benefits to the town.</p> <p>A risk of permitting an outlet centre is that it changes over time to an out of town centre (unlikely to have been permitted under normal retail policy - Retail Planning Guidance, etc).</p> <p>Selected locations not sustainable in terms of traffic impact and availability of public transport.</p> <p>Study found that proposed locations on the N25 had the largest traffic impact of all the areas assessed. Other locations e.g. the north west near the N20 scored well in terms of traffic impact and commercial viability and also had a proposed rail station but were not considered, as they were outside the Cork County Council area. Unclear why the study undertook the assessment on an area basis if it was intended to exclude such locations on this basis in any case.</p> <p>Full assessment of the viability and vitality of the city centre and town centres (absent from the study) and a detailed analysis of the future are warranted (as part of overall Joint Retail Strategy).</p> <p>Request that this variation not proceed until this updated strategy has been prepared.</p> <p>Appendix 1 - Issues with background study Issues in relation to the background study include:</p> <ul style="list-style-type: none"> • Use of out of date data; • Concerns relating to the excessive scale of the assumed catchment of the outlet centre; • Limited regard to evolving trends in retailing; • Under estimation of the impact of on-line retailing; • Lack of regard for the current trends in the comparison retail sector; • Lack of regard to potential existing vacancy and under-trading in existing stores in estimating new retail floorspace; 	<p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>A retail impact assessment will be required as part of any future planning application for a retail outlet centre. Appropriate conditions would be attached if required.</p> <p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27</p> <p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27 and Issue 7: Study Methodology, pages 27-28</p> <p>As part of the Cork County Development Plan Review Cork County Council and Cork City Council will be preparing a Draft Joint Retail Strategy covering the City and the County. This can be further considered at that stage.</p> <p>Noted.</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p>

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	<ul style="list-style-type: none"> • Overestimation of tourism spend; • Lack of detailed evidence in assessing retail impact of nearby city and town centres; • Limitations in the transport assessment; and • Flawed site strategic and site selection methodology. 	
<p>Waterford City and County Council VARROC158252 872</p>	<p>The proposed variation would be contrary to the core principles of: The National Planning Framework; the Draft Regional Spatial and Economic Strategy of the Southern Regional Assembly; the Draft Cork Metropolitan Area Strategic Plan (MASP); the Transport Strategy for the Cork Metropolitan Area (CMATS); the Spatial Planning and National Roads Guidelines for Planning Authorities 2012; and the Retail Planning Guidelines for Planning Authorities 2012.</p> <p>A large Retail Outlet Centre would not fit within the agreed Joint Retail Strategy retail hierarchy and could potentially threaten and undermine the joint approach that has been followed to date.</p> <p>The Draft Regional Spatial and Economic Strategy supports the role of the Metropolitan Cork Joint Retail Strategy and seeks further preparation of joint retail strategies for Metropolitan Cork between Cork City Council and Cork County Council. The variation would be contrary to emerging regional planning policy.</p> <p>Given the strategic importance of the N25 as a key national route and given the opposition to this proposal from both the NTA and TII, we contend that the proposed variation would be contrary to the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities 2012 as they relate to the protection of the capacity of national routes.</p> <p>The Retail Planning Guidelines for Planning Authorities 2012 state that Retail Outlet Centres should not be permitted in more remote out-of-town locations. As a specific urban location for such a centre is not identified it is considered to be contrary to the guidelines.</p> <p>A variation of the 2014 County Development Plan to facilitate a particular development, in the absence of a fully integrated review of settlement, transportation, retailing and other relevant policies and objectives might prejudice the delivery of plan led and co-ordinated future for Metropolitan Cork, the City Centre, the Ring Towns and the wider region.</p> <p>The report ignores the level of trade diversion from other higher order centres throughout the wider region which might result from such a development.</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19, Issue 3: Alignment with NPF, pages 19-20, Issue 4: Consistency with Regional Planning Guidance, pages 20-22, Issue 6: Traffic and Transportation Issues, pages 23-27 and Issue 7: Study Methodology, pages 27-28</p>

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<p>Alan Maurice O'Connor - Councillor VARROC158197 405</p>	<p>1. Sustainability - Car dependency and Climate Change</p> <p>The adoption of this variation would promote and encourage unsustainable practices in the county and be contrary to/contradict goals/objectives such as:</p> <ul style="list-style-type: none"> • Retail Planning Guidelines which seek to secure a general shift towards sustainable travel modes through careful location and design of new retail development. • Spatial Planning and National Roads Guidelines for Planning Authorities (SPNRG) which seek to secure more compact development that reduces overall demand for transport and encourages modal shift towards sustainable travel modes. • Many of the National Strategic Outcomes (framework goals) set out in the National Planning Framework (NPF). <p>The NPF itself is secondary to the government's Climate Action Plan 2019.</p> <p>The study does not take into account the projected future population growth and the effect this may have on the local transport network.</p> <p>SPNRG seek to protect undeveloped lands adjoining national roads and junctions from development so as to cater for potential capacity and safety enhancements.</p> <p>Site-selection in the study makes no quantitative assessment of road capacity. Proposal will have a knock-on effect on the broader road infrastructure representing traffic-inducing development.</p> <p>NPF principle of ensuring more compact and sustainable forms of development is recognised in the study but it states that retail is 'not specifically identified' and weakly concludes that the proposal is in compliance with retail planning policy objectives due to</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19, Issue 3: Alignment with NPF, pages 19-20, Issue 4: Consistency with Regional Planning Guidance, pages 20-22 , Issue 8: Environment/Climate Change, pages 29-30, Issue 9: Content of the SEA, page 31.</p> <p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 3: Alignment with NPF, pages 19-20</p>

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	<p>being introduced as part of Variation 1 of the CCDP.</p> <p>A key action of the national Climate Action Plan which overrides the NPF is the 'realisation of the principle underpinning Project Ireland 2040 for compact, connected, and sustainable development'.</p> <p>Cork County Council's Climate Adaptation Plan requires that the Cork County Development Plan and Local Area Plans identify and integrate climate change as a critical consideration during the review. This variation is a review of the County Development Plan.</p> <p>Variation omitted any environmental analysis, assessing only economic and transport considerations. No measurement of how proposal might be considered sustainable nor reference to 'climate' or 'emissions'. The Environmental Reports make only general reference to climate, with no assessment of impact. No context is provided for the dismissal of Schedule 2A.</p> <p>The study and environmental report, are fundamentally flawed in that, contrary to the policy framework they omit to take into account the most pressing issues of our time –climate change and environmental degradation.</p> <p>2. Economic considerations and retail policy framework</p> <p>The Retail Planning Guidelines are unclear in relation to locating retail outlet centres. Considering the proximity to Cork City it could be strongly argued that it may either divert a significant amount of expenditure or be unlikely to succeed commercially. Money spent in the ROC will inevitably be money not spent in other urban centres.</p> <p>The opportunity cost of a ROC is great. Simply because the proposed ROC may suit a particular business model does not mean it should be pursued.</p> <p>The SPNRG state that new retail and employment developments can lead to car dependent forms of development and that policy no longer proposes to cater for the type of unlimited road traffic growth driven by the scenario outlined. Variation would be contrary to this.</p> <p>The economic case for the proposed ROC which adoption of this variation would give rise to is dubious.</p> <p>Conclusion</p>	<p>See response set out under Issue 8: Environment/Climate Change, pages 29-30</p> <p>See response set out under Issue 8: Environment/Climate Change, pages 29-30</p> <p>See response set out under Issue 8: Environment/Climate Change, pages 29-30, Issue 9: Content of the SEA, page 31</p> <p>See response set out under Issue 8: Environment/Climate Change, pages 29-30, Issue 9: Content of the SEA, page 31</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27</p> <p>Noted</p> <p>Noted</p>

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	<p>Sustainable design is compact, polycentric, ecologically aware and based on walking. Successful retail outlet centres concede with their own design an acknowledgement of what makes for a pleasant built environment – the car-free urban centre. 95% of visitors drive.</p> <p>Current environmental crisis means we need to change the way we do business. Adopting variation would be a massively retrograde step and the focus should be on existing village and town centres making them attractive, viable, and sustainable.</p> <p>Recommend that the proposed variation would not be adopted.</p>	
Ann O'Driscoll VARROC157933 957	Support new retail outlet centre in East Cork as would be of great benefit	Noted
Blarney Castle Estates VARROC158201 006	<p>Concerned that background study did not carry out a more comprehensive assessment of the shortlisted sites.</p> <p>Consider that the Blarney area should have been ruled out as unsuitable for reasons of negative traffic impacts; negative impact on the established tourism economy of Blarney and potential negative impacts on the sensitive view shed of Blarney Castle.</p> <p>Request that Cork County Council give due consideration to the impact of a ROC on the vitality of Cork City Centre.</p>	<p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>Noted</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p>
Brian Russell VARROC158152 561	This development will be detrimental to the retail economies of all large towns in the county and also to city centre trade and will drive traffic to an unsustainable level.	Noted
C. Lynch VARROC153571 153	A shopping facility like Kildare village will be a great asset to East Cork	Noted
Cork Branch of the Irish Hotels Federation VARROC158245 451	<p>A Retail Outlet Centre presents a significant Tourism and Economic opportunity for Cork. The Tourism Impact Statement (CHL consulting) outlines the benefits.</p> <p>Would lead to;</p> <ul style="list-style-type: none"> • Attracting significant visitors' numbers to Cork • Generating additional spending & economic activity for Cork • Generating additional bed nights for Cork <p>Tourism strategy for Cork: Growing Tourism in Cork - A</p>	See response set out under Issue 5: Economic Benefits to Cork, page 22

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	<p>Collective Strategy 2016-2020 highlights the goal of increasing tourism revenue through the development of compelling visitor proposition based on the delivery of distinctive visitor-centric experiences, which include 'in places to shop'. A Retail Outlet Centre is entirely consistent with this strategy and will introduce a unique experience to the Cork region and beyond, which will increase the revenues earned from tourism, and which will also help to increase source market diversity, and lengthen the season.</p>	
<p>Cork CS/BW international group VARROC158298 179</p>	<p>The development of out of town retail and office parks off major roadways has been shown nationally and internationally to undermine the social, cultural, economic and environmental sustainability of communities.</p> <p>Biggest impediment to recruiting and retaining high quality mobile international talent to Cork and Ireland which draws international investment to the cork region is the low density dispersed nature of development including retail.</p> <p>Developments of this type undermine the quality of life of people in the Cork region, locals as well as the newly arrived as well as social, cultural and above all the economic viability of the region.</p> <p>National planning framework strongly supports concentration of development. Developments of this type are inaccessible except by car.</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 3: Alignment with NPF, pages 19-20.</p>
<p>Cork Environmental Forum VARROC158275 604</p>	<p>Opposed to the variation which is not what the County needs to do to improve its retail offering and to support businesses and communities.</p> <p>Investment should be spent on improving the retail offerings of the villages and towns of East Cork which would have much greater impact to rejuvenate these communities and support jobs more locally.</p> <p>Given the context of the current Climate Crisis and the need to provide facilities that are easily accessed by more sustainable modes having such a big centre is not future proofing and does not align with Climate adaptation and mitigation actions.</p> <p>Providing a high end retail offering for tourists should not be the priority of this Council. The cruise industry which is one of the sources of these tourists, is coming under increased scrutiny and by the time the centre is built in 2024 may no longer be operating or acceptable at the same levels.</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 3: Alignment with NPF, pages 19-20, Issue 8: Environment/Climate Change, pages 29-30, Issue 9: Content of the SEA, page 31 and Issue 10: Investment in existing town centres, page 32.</p>

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	What will be the ramifications for other businesses and jobs in the neighbouring towns and the city?	
Emily Leonard VARROC153565 085	<p>Need to be improve the retail environment by allowing for a retail outlet centre.</p> <p>Impact on the high street is irrelevant and high street will always be impacted when consumer needs are ignored.</p> <p>Having an outlet village in the Cork area will make it a destination, bring more visitors to the area and in turn impact the city centre in a positive way.</p> <p>Proposal is a modern consumer experience.</p>	Noted
Eoin Lettice VARROC158021 986	The Council's vision can best be achieved by the support and encouragement of the existing retail centres within the metropolitan area – e.g. Midleton, Mallow and Cork City Centre, which are already served with appropriate infrastructure: road network, public transport, dining and entertainment venues, etc. To do otherwise would directly threaten the viability of such existing centres and contribute to unnecessary private vehicle use leading to significant environmental impacts.	See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Investment in existing town centres, page 32.
Eoin O' Dwyer VARROC153477 544	<p>The variation is inappropriate and the negative impacts would be:</p> <ul style="list-style-type: none"> • drawing people away from local towns at a time when the primary focus should be the revitalisation of town centres; • further reliance and emphasis on private vehicles during a time of climate crisis; • an outdated form of development destructive to the fabric of local regions <p>Efforts should be focused on revitalising the centres of cities and towns and developing efficient and prioritised public transport to and from these places.</p>	See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Investment in existing town centres, page 32.
Geraldine McDonald VARROC153458 166	Supports the development of a retail outlet centre on the Cork to Midleton road.	Noted
Gill Weyman VARROC153178 260	Proposed Variation is not sustainable or needed. Will add more traffic to roads and will impact on the city and other rural businesses. A more sustainable	See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17,

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	<p>approach would be to support other local businesses in other towns and to reduce travel journeys.</p>	<p>Issue 6: Traffic and Transportation Issues, pages 23-27, Investment in existing town centres, page 32.</p>
<p>Glounthaune Sustainable Development Committee VARROC158218 112</p>	<p>Reject variation as it is unsustainable and contrary to national guidelines. It would condemn the main streets of Midleton, Cobh and Carrigtwohill to higher vacancy rates and less varied retail offering and would be detrimental to city centre retailers. Cork has a best practice example of rejuvenating a main street in Clonakilty which should be rolled out in all our major towns. The following are noted:</p> <p>The Retail Planning Guidelines 2012 reiterate national policy objectives to secure the future of city and town centres by prioritising and planning future development in these locations. National Policy 27 seeks to ensure integration of safe and convenient alternatives to the car into the design of our communities.</p> <p>Predicted annual loss of trade of €3million per annum to Midleton alone which is an unacceptable loss to local traders especially as the short-term and long-term economic impacts of Brexit and climate change are not yet understood. Offer in most outlet schemes is no longer factory seconds or end of line products (Savill's Research Spotlight Report on the Future of Outlet Shopping 2017). No reason to assume the products sold will be different to those at Kildare Outlet Village and will compete directly with existing retailers. If higher order retailers close existing main streets will be left with lower order shops. This can be seen on the main street of Kildare town. This damages the viability and vitality of towns.</p> <p>Proposal would result in leakage of jobs from existing retailers which has not been considered. A large percentage of retail outlets are taken up by café and restaurants, in direct competition with existing ones in the area. This percentage is growing as highlighted in Savills Report which states that total food and beverage on new/redeveloped schemes typically occupied 20-30% of units.</p> <p>Proposal would be detrimental to city centre retailers and knowingly risk a negative effect on the counties Patrick Street. Study understates impact stating that 'if the pipeline is deducted, the percentage impact will be</p>	<p>See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19 and Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19 , Issue 3: Alignment with NPF, pages 19-20 and Issue 4: Consistency with Regional Planning Guidance, pages 20-22</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28 and Issue 5: Economic Benefits to Cork, page 22</p> <p>See response set out under Issue 7: Study Methodology, pages 27-</p>

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	<p>greater'.</p> <p>Development would contravene NPF national policy objective 27 to ensure integration of safe and convenient alternatives to the car into the design of our communities. Allowing this car-based shopping outlet centre ignores our obligation to reduce carbon emissions due to transport.</p> <p>The Strategic Environmental Assessment scoping has not considered impacts of the proposal in relation to climate change (EPA screening submission) along with other requirements which have not been met. SEA does not adequately consider Schedule 2A and the variation does not support sustainable development. Section 3 of the EPA SEA Environmental Report and Plan Template gives more thorough consideration of what is required.</p>	<p>28 and Issue 5: Economic Benefits to Cork, page 22</p> <p>See response set out under Issue 3: Alignment with NPF, pages 19-20 and Issue 8: Environment/Climate Change, pages 29-30.</p> <p>See response set out under Issue 8: Environment/Climate Change, pages 29-30 and Issue 9: Content of the SEA, page 31.</p>
Jonathan Millar VARROC153729 536	Support building of a retail outlet centre on the N25 in the vicinity of Midleton and Carrigtwohill.	Noted
Karl Diskin VARROC158291 306	<p>A retail outlet centre which supports the 'vision' of the variation should be located within one of the many existing town retail centres many of which are struggling.</p> <p>An out-of-town location could impact negatively on the main street. Such centres are damaging to urban and town vibrancy, driving private car use, traffic congestion and emissions, encouraging sprawled development, and working contrary to the proper goals of busy, active and vibrant town centres.</p> <p>It is a nonsense to claim that clothing and wares for sale in the 'retail outlet centre' will not be in competition with those currently on sale in the towns and this text should be omitted from the proposed variation.</p>	See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19 and Issue 7: Study Methodology, pages 27-28
Kevin Burke VARROC158280 383	<p>Variation is contrary to purpose and spirit of National Planning Framework, Draft Cork MASP and CMATS 2040 strategic objectives of compact urban settlements retail and employment destinations, fully accessible by high frequency public transport and quality walking and cycling networks. The proposed uses are high-trip generating developments of which the most appropriate location within the Cork Metropolitan Area is Cork City Centre.</p> <p>Recent precedent indicates preference for accessible locations within the footprint of existing city boundaries strengthening their role as regional shopping centres in</p>	See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19, Issue 3: Alignment with NPF, pages 19-20. Issue 4: Consistency with Regional Planning Guidance, pages 20-22, Issue 6: Traffic and Transportation Issues, pages 23-27.

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	<p>a manner consistent with the hierarchy established by National Governments Retail Guidelines.</p> <p>The proposed sites for development of outlet stores are located within a noted problematic area for congestion. Likely to be contrary to Transport Infrastructure Ireland objectives.</p>	
Kevin OSullivan VARROC153596 868	<p>Support the variation but consider that it is imperative that transport links are considered in detail.</p> <p>Need to consider upgrading the N25 as increased traffic associated with the proposed development will have a significant impact.</p>	Noted
Laurie Harte VARROC153084 594	Object to development of a retail outlet centre in this area which is already congested and has been worsening over the past two decades.	Noted
Louise Cotter VARROC158290 544	<p>Variation is a retrograde step in the promotion of sustainable development for the whole county. Contravenes national policy, including the Draft Regional Spatial & Economic Strategy and the National Planning Framework which stress the requirement for sustainable development and consolidation. This proposed variation will result in:</p> <ul style="list-style-type: none"> • Increased use of cars-despite a rail link which is not well connected and infrequent-most people will drive • Reduced business for retail and services in Cork city, Midleton and beyond • Reduced land for much needed housing 	See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19. Issue 3: Alignment with NPF, pages 19-20. Issue 4: Consistency with Regional Planning Guidance, pages 20-22, Issue 6: Traffic and Transportation Issues, pages 23-27.
Marcia D'Alton Councillor VARROC158280 169	<p>1. National and regional policy contain one clear message regarding the primacy of urban centres. Particularly in the context of the draft RSES enhancing the vibrancy and vitality of urban centres is important. Variation does not support these aims.</p> <p>2. Contrary to the Retail Planning Guidelines which have a general presumption against retail outlet centres and caution how they can negatively affect existing retail centres. At best, Carrigtwohill or Midleton may benefit to the detriment of Cork City and other county towns.</p> <p>3. Joint Retail Strategy has a stated policy of maintaining Cork City Centre as the primary location for comparison shopping. 45% of the custom for the proposed ROC is estimated as originating from the city but implications have not been considered.</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19. Issue 3: Alignment with NPF, pages 19-20. Issue 4: Consistency with Regional Planning Guidance, pages 20-22,</p> <p>See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19.</p> <p>See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19.</p>

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	<p>4. Examination of existing vacancy did not form any part of the study. The Joint Retail Strategy 2015 states that when considering the future allocation of comparison floorspace, regard must be had to the extent of existing vacancy within the core areas of towns in the Metropolitan area. Basic information on commercial vacancy available through Geodirectory in Q2 2019.</p> <p>5. County Development Plan objective TCR 9-1 to reduce the amount of vacant floorspace in core retail areas by 50% has not been close to achieved. Corks commercial vacancy rate was c.11% in both 2014 and 2019.</p> <p>6. The study indicates that an ROC could pose a threat to current and future retailing in urban centres throughout the region. In its absence available expenditure would be spent in retail outlets in urban centres. Study predicts that 45% of trips would come from Cork City which would clearly impose a negative impact on the primacy of Cork City Centre. If passengers on visiting cruise liners spend an average of 42% of their money on shopping, an ROC adjacent to the Cobh cruise terminal would similarly be in direct competition with existing town centre retail outlets.</p> <p>7. Town centres are our greatest assets and could fulfill roles proposed by a ROC given funding, support and opportunity. Cork Strategic Tourism report identifies a general lack of awareness of the county's assets. Would be better placed in enhancing those visitor attractions and building awareness than supporting new retail attraction with potential to impact negatively on existing attractions and town centres.</p> <p>8. Entirely car-focused development at a time of acute climate awareness. To encourage development that relies so heavily on the private car is entirely contrary to national policy.</p> <p>9. No assessment of the carbon impact. All local authorities in Ireland recently signed a charter committing to decarbonising their activities, pursuing sustainable development and putting in place a process for carbon-proofing decisions, programmes and projects.</p> <p>10. No meaningful Strategic Environmental Assessment. Development generating some 35,000 customer trips each week is a very clear and significant environmental effect. Not acceptable without calculating the carbon</p>	<p>See response set out under Issue 7: Study Methodology, pages 27-28.</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28.</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28 and Issue 5: Economic Benefits to Cork, page 22.</p> <p>See response set out under Issue 5: Economic Benefits to Cork, page 22 Issue 10: Investment in existing town centres, page 32.</p> <p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27 and Issue 8: Environment/Climate Change, pages 29-30.</p> <p>See response set out under Issue 8: Environment/Climate Change, pages 29-30.</p> <p>See response set out under Issue 9: Content of the SEA, page 31.</p>

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	<p>impact.</p> <p>11. Only one of the bodies consulted in the course of the study is supportive of the concept while remainder have expressed similar concerns to those outlined.</p> <p>12. Paragraph 2.6 reaffirms that the city/town centre is a priority for new retail development and also accords with advice outlined in the Retail Policy Guidelines. If Variation No. 1 is contrary to national retail policy we need to re-examine this in the context of the County Development Plan review.</p> <p>13. Variation No. 1 commits to a "detailed evidence-based assessment". Having not included consideration of existing commercial vacancy the study completed has failed to fulfil this commitment. Failure to undertake a meaningful SEA is in breach of Directive 2001/42/EC.</p> <p>14. Need for the Council's time and energy to be focused on building up its existing town centres such as Passage West not on facilitating the development of an ROC.</p>	<p>Noted</p> <p>See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28.</p> <p>See response set out under Issue 5: Economic Benefits to Cork, page 22 Issue 10: Investment in existing town centres, page 32.</p>
Mary Quilligan VARROC154083 435	Support an Outlet Centre like Kildare Village in Cork as it will generate a lot of money, tourism and employment.	Noted
Michelle Browne VARROC153621 864	Support a retail outlet centre as a positive attraction in East Cork. It would be positive for the Cork economy and encourage visitors and shoppers from other counties.	Noted
Padraig Fitzgerald VARROC158115 618	<p>Traffic</p> <p>The two sites at Killacoyme are not suitable and will result in significant additional traffic on roads that are not capable of supporting it. Existing capacity and congestion issues exist on both N25 and Glounthaune roads - cannot accommodate additional trips without significant disruption. An existing planning submission for a new school and campus in the Castl lake area and an increase in retail outlet traffic likely would mean that school traffic will also be negatively impacted.</p> <p>Environmental and Sustainability</p> <p>Unacceptable that 90% of access to the retail centre will be by car. Type of development is environmentally unsustainable and needs to consider climate change. Aim should be to incentivise people to use public transport. Any</p>	<p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27 and Issue 8: Environment/Climate Change, pages 29-30.</p>

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	<p>development that contributes to worsening the situation should not be welcomed.</p> <p>Impact of development on Harpers Grove wetland centre an important ecological site needs to be considered.</p> <p>Accept there is a positive argument for a retail centre in East Cork similar to Kildare Village.</p>	
<p>Padraig Sheehan VARROC153544 058</p>	<p>The notional catchment area for users of the retail outlet centre is defined by a two-hour drive time but foresees that people will travel further (which includes much of the southern half of the country). The commercial development should be taking place within the footprint of our existing villages, towns, and city serviced by public and active transport in a way that inclines people to use those services.</p>	<p>Noted</p>
<p>Peter MacDonald VARROC158141 120</p>	<p>Strongly disagree with proposed variation. It represents a backward looking approach to retail which focuses on centralising retail units outside the city centre, thereby impacting the viability of Cork City centre which is already struggling. It places reliance on cars for transportation given the lack of public transport to the area proposed. We should be focusing on strengthening our existing city centre, providing high quality retail units therein, improving transportation links to it and encouraging greater public transport use.</p>	<p>See response set out under Issue 6: Traffic and Transportation Issues, pages 23-27.</p>
<p>Richard Cuddy VARROC158016 361</p>	<p>Variation is unsustainable and contrary to national guidelines. Would condemn the main streets of Midleton, Cobh and Carrigtwohill to higher vacancy rates and less varied retail offering and would be detrimental to city centre retailers. The following are noted:</p> <p>The Retail Planning Guidelines 2012 reiterate national policy objectives to secure the future of city and town centres by prioritising and planning future development in these locations.</p> <p>Predicted annual loss of trade of €3million per annum to Midleton alone which is an unacceptable loss to local traders especially as the short-term and long-term economic impacts of Brexit and climate change are not yet understood. If higher order retailers close existing main streets will be left with lower order shops. This can be seen on the main street of Kildare town. This damages the viability and vitality of towns.</p> <p>Proposal would result in leakage of jobs from existing</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19, Issue 3: Alignment with NPF, pages 19-20 and Issue 4: Consistency with Regional Planning Guidance, pages 20-22.</p> <p>See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19.</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28</p> <p>See response set out under Issue 7: Study Methodology, pages 27-</p>

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	<p>retailers which has not been considered.</p> <p>Proposal would be detrimental to city centre. Study understates impact stating that 'if the pipeline is deducted, the percentage impact will be greater'.</p> <p>Development would contravene NPF national policy objective 27 to ensure integration of safe and convenient alternatives to the car into the design of our communities. Allowing this car-based shopping outlet centre ignores our obligation to reduce carbon emissions due to transport.</p> <p>The Strategic Environmental Assessment scoping has not considered impacts of the proposal in relation to climate change (EPA screening submission) along with other requirements which have not been met. SEA does not adequately consider Schedule 2A and the variation does not support sustainable development. Section 3 of the EPA SEA Environmental Report and Plan Template gives more thorough consideration of what is required.</p>	<p>28 and Issue 5: Economic Benefits to Cork, page 22</p> <p>See response set out under Issue 7: Study Methodology, pages 27-28.</p> <p>See response set out under Issue 3: Alignment with NPF, pages 19-20 and Issue 8: Environment/Climate Change, pages 29-30.</p> <p>See response set out under Issue 8: Environment/Climate Change, pages 29-30 and Issue 9: Content of the SEA, page 31.</p>
<p>Rioja Estates Limited VARROC158256 030</p>	<p>Rioja Estates Ltd. is Europe's leading independent promoter and developer of Designer Outlet Villages.</p> <p>The purpose of this submission is to:</p> <p>(a) Support the principle of the proposed Variation which identifies the NE2 sub-catchment as the most suitable general location for a Retail Outlet Centre (ROC);</p> <p>(b) Demonstrate that the site selected by Rioja Estates Ltd. (NE2-1 at Killacloyne, Carrigtwohill) is the most suitable of the three sites identified by the Study within the NE2 sub-catchment;</p> <p>(c) Seek a minor modification to the wording of the Proposed Variation to ensure that a planning application for an ROC on any of the NE2 sites identified by the Study would not be considered to be a material contravention of Chapter 14 of the County Plan.</p> <p>The modification sought would confirm that the planning policy framework would support the provision of a Retail Outlet Centre on lands zoned for business or enterprise use.</p> <p>Note: Submission includes a large planning submission from which the following points have been extracted.</p>	<p>See response set out under Issue 1: Office of the Planning Regulator Issues, pages 11-17, Issue 2: Consistency with Retail Planning Guidelines, pages 18-19, Issue 3: Alignment with NPF, pages 19-20 and Issue 4: Consistency with Regional Planning Guidance, pages 20-22, Issue 5: Economic Benefits to Cork, page 22 and Issue 11: Other issues, page 32.</p>

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	<p>There is potential for a second outlet village in Ireland, complementing the very successful Kildare village. Cork is the preferred location for a second outlet because:</p> <ul style="list-style-type: none"> • Tourism • Population • Accessibility • Second city of the country Distance from Kildare <p>East Cork is the preferred location in the Cork region because</p> <ul style="list-style-type: none"> • Existing established Tourist routes in the area • Good accessibility and communications – along the N25 • An excellent Catchment profile • Cork cruise terminal at Cobh is in close proximity • Sites within other sub catchments are demonstrably unsuitable • Site NE2-1 in particular is suitable for a number of reasons <p>Benefits to Cork</p> <ul style="list-style-type: none"> • Centre will provide an additional tourist attraction – a specialist retail and leisure destination • Estimate will attract 2 – 2.5 million visitors per annum to the centre • Provide an outlet centre in a region of Ireland that is not well served by a premium outlet offer • will create a regional shopping destination in Co Cork serving the South West of Ireland • will provide a catalyst for further regeneration in the Cork Metropolitan Area • will provide an excellent complement to the local towns and Cork city • will create circa 1200 jobs in the region • will attract approximately €100 million investment • will become a major leisure catalyst and destination for the Cork Region • will become a tourist attraction – a specialist retail and leisure destination. <p>Why will Cork Tourist Outlet Village be Successful?</p> <ul style="list-style-type: none"> • Location – based 16 miles (30 mins drive) from Cork as gateway city, access to Cork Airport and port, Exit 19 from M8 • Growth in tourism visitor numbers to Cork • Continuing growth in cruise traffic to Cork. 68 cruise liner calls in 2017 – 100 calls in 2018. Shopping tourism is a good fit with these visitors • Reinforcing synergies between tourism visitor flows 	

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	<p>and shopping visitor flows</p> <ul style="list-style-type: none"> • Increased economic activity and job creation • Strong domestic population base in Munster (Waterford, Cork, & Limerick). <p>Wording of proposed variation</p> <p>The wording proposed for Objective TCR10-2 Retail Outlet Centre, should be amended to clarify the business and enterprise sites identified in the Study are acceptable in principle. Proposed the following wording be included:</p> <p>TCR10-2 Retail Outlet Centre – Support the provision of a Retail Outlet Centre in the NE2 subcatchment (N25) of the County Metropolitan Cork Strategic Planning Area, on lands zoned for business or enterprise use.</p> <p>Economic Impact</p> <p>Economic benefits will be generated during the construction phase and the operational phase. A Cork impact of +€29m to the economy in the construction phase, +€51m in the operational phase. +640 jobs in the operational phase and +1,100 jobs in the operational phase.</p> <p>The development of CTOV will:</p> <ul style="list-style-type: none"> • contribute to Cork's long term strategic aims • generate a major new economic and tourism infrastructure • complement existing infrastructure and a corridor-based approach to development • Will be a unique and complementary addition to the growing range of visitor attractions in East Cork. • Will fill a long-standing gap in Cork's tourism infrastructure and complement Kildare Village. • Shopping is an Increasingly Important Part of Tourism • tourists spend twice as much on shopping as on sightseeing and entertainment • retail tourism has become the fastest-growing product in the tourism sector • CTOV is entirely consistent with Growing Tourism in Cork - A Collective Strategy 2016-2020 • There is a distinct synergy between a successful retail sector and a strongly performing tourism industry. <p>Contribution of Cork Tourist Village at Carrigtwohill</p> <ul style="list-style-type: none"> • A Commercial Feasibility Study estimates that CTOV will attract some 218,000 tourists a year in Phase 1, 337,000 tourists a year in Phase 2. • 50% of the 218,000 tourists visiting will stay in the area, generating 109,000 bednights. 40% of these 	

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	<p>tourists will be drawn to the area exclusively by CTOV, generating an incremental 60,000 tourist bednights a year.</p> <ul style="list-style-type: none"> • It is estimated that more than 300,000 day trips a year will be made by people living outside Cork, thereby bringing considerable additional revenue into the area. • The importance of attractors such as CTOV in bringing added value to the local and Cork regional economy cannot be over-emphasized. The CTOV will enhance Cork's appeal to tourists, including cruise ships and visitors from developing markets such as China and India, and will thereby stimulate additional demand for tourist goods and services in the Cork region. <p>DOVs and Town Centres</p> <ul style="list-style-type: none"> • Town centres perform well alongside Outlet Villages because of the different nature of the retail offering and the distance travelled by people who visit it. • There are now 32 trading in UK and there is a significant amount of data supporting the fact that there is no material retail impact on existing town and city centres. In fact they draw additional expenditure into the area which helps to boost town and city centre turnover through linked trips. • DOVs sell heavily discounted products not normally found on the high street - end-of-line, seconds and out of season goods – and do not offer other services which help to underpin the vitality and viability of town and city centres (such as banks, buildings societies, post offices, hairdressers, dry cleaners etc). People do not visit DOVs for day to day shopping needs and convenience retailing, so DOVs therefore compliment, rather than compete with, town centres. There are many examples of this in the UK. <p>General Principles</p> <ul style="list-style-type: none"> • Generally accepted effects of DOV projects are an indication of what is likely to happen in Cork • The DOV will create a regional destination • The upmarket high-quality scheme will enhance the perception of Cork as a place to shop and visit Wider spending encouraged from linked trips • The DOV will create an opportunity to market Cork to a wider audience • The DOV will attract visitors from outside the region into the local area for including the English market. <p>Highways and transportation</p> <ul style="list-style-type: none"> • The issue of the capacity of the N25 and the Cobh Cross interchange is being actively addressed by the 	

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	<p>Planning Authority</p> <ul style="list-style-type: none"> • ROC and other projects will justify the proposed investment in the upgrade of the traffic and transportation networks in the Carrigtwohill area. • The application of a modal split of 90% for car-based travel to/from a proposed Outlet Centre in Cork is not representative or accurate. The accessibility characteristics of the Kildare Tourist Outlet Village (KTOV) are not comparable to the sites selected for analysis within Cork, particularly the subject NE2-1 Carrigtwohill site. 	
Stephen Spillane VARROC153453 024	Do not consider the proposed variation as the correct way forward for the county. Occupancy levels at out-of-centre shopping centres are falling as people want to travel less by car. The proposed location of this possible development could be detrimental for town centres across East Cork, many of which are already struggling. The council should reconsider and invest in East Cork Towns and villages.	See response set out under Issue 2: Consistency with Retail Planning Guidelines, pages 18-19 and Issue 7: Study Methodology, pages 27-28.
Tarak Ben Amor VARROC153490 041	The creation of a retail outlet in Cork will give a great boost to the economy and attract new business to Cork. Dublin has many retail outlets while Cork has none. The Cork population has hugely increased in the last 5 years and a project of this nature is required and welcomed.	Noted
Teresa Leahy VARROC153551 093	If the retail centre is to be located on the former Amgen site on N25, it should not go ahead as it will cause major traffic and road congestion on a busy road. However if it is to be located in a retail park off the N25 then it would be good.	Noted
Tom Browne VARROC153859 530	The construction of an outlet centre between Cork and Midleton is supported and badly needed in East Cork. It would be extremely beneficial to the local economy.	Noted
V Leonard VARROC153588 837	The proposed variation will benefit Cork enormously.	Noted
Valerie Kearney VARROC153581 298	Would like to see a Kildare type village in Cork area and it would service all Southern Ireland.	Noted

Appendix C: List of Submitters

Environmental Protection Agency
Alan Maurice O'Connor
Ann O'Driscoll
Blarney Castle Estates
Brian Russell
C. Lynch
Cllr Marcia D'Alton
Cork Branch of the Irish Hotels Federation
Cork City Council
Cork CS/BW international group
Cork Environmental Forum
Department of Education & Skills
Emily Leonard
Eoin Lettice
Eoin O'Dwyer
Geraldine McDonald
Glounthaune Sustainable Development Committee
Jonathan Millar
Karl Diskin
Kevin OSullivan
Louise Cotter
National Transport Authority
Michelle Browne
Office of Public Works
Office of the Planning Regulator
Padraig Fitzgerald
Padraig Sheehan
Peter MacDonald
Richard Cuddy
Rioja Estates Limited
Southern Regional Assembly
Stephen Spillane
Tarak Ben Amor
Teresa Leahy
Tom Browne
Transport Infrastructure Ireland
V Leonard
Valerie Kearney
Waterford City and County Council
Kevin Burke

Appendix D: List of Late Submissions

Port of Cork

