



h w p l a n n i n g

Submission to Draft Cork City Development Plan 2022 - 2028

Zoning Submission – Lands at Coolflugh, Cloghroe, Tower, Cork.

Cloghroe Development Limited

September 2021

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Connecting places.

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01 Introduction

01.1 Purpose of Submission

This submission has been made on behalf of Cloghroe Development Limited. It has been prepared in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 (Draft CDP). This submission is in response to the Council's draft policies and zoning objectives for the settlement of Tower. Specifically, this submission requests that the lands in our client's ownership in the townland of Coolflugh, be identified as a future '*Neighbourhood and Local Centre*' (Zoning Objective ZO 09) for the settlement in the future Cork City Development Plan 2022-2028. In the interests of clarity, the extent of the lands in our client's ownership and its location within the settlement of Tower is outlined in red below.



Figure 01.1 Subject Lands outlined in Red

01.2 Submission Context

01.2.1 SETTLEMENT CONTEXT

Our clients welcome the publication of the Draft CDP and consider it represents an opportune time to re-evaluate the strategic growth of Cork City and its suburbs, particularly in the context of the Cork City Boundary Extension which took effect in June 2019. Since

the adoption of the boundary extension the settlement of Tower has been transferred to the administrative area of Cork City Council, having previously been within the jurisdiction of Cork County Council. The new City Development Plan represents an opportunity to revisit the future vision of Tower, reflecting the settlements strategic function as an '*Urban Town*' in the settlement hierarchy of the forthcoming Cork City Development Plan. Towers identification as one of four '*Urban Towns*' in the Draft CDP represents an acknowledgement that the settlement is a 'town' settlement and its designation as a 'Key Village' in the current Cork County Development Plan is inappropriate. The categorisation of Tower as a 'town' is also in accordance with national guidance and in particular the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (SRDUA) which defines a small town as having a population between 2,000 and 5,000 no. people.

The existing settlement of Tower consists of two traditionally separate villages, Tower and Cloghroe, which have coalesced in recent decades to form a single administrative settlement. The development context in Tower has evolved considerably in the past 30 years. The population of Tower grew to 3,032 people by 2002, having increased by 116.3% since 1991. The 2011 census calculated that in 2011, 3,306 people lived in Tower which was an increase of 6.6% from 2006. The most recent 2016 census recorded a population of 3,421, a further increase of over 3%. The Draft CDP identifies significant increases in population and housing growth in Tower with.

- Table 2.2 of the Draft CDP earmarking a population increase of 36% (1,163 no. people) in the settlement by 2028.
- Table 2.3 of the Draft CDP identifying a yield of 467 no. units on Tier 1 and 2 zoned lands by 2028.

Table 2.5 of the Draft CDP identifies that '*Urban Towns*' are to play an important role in the future evolution of the wider city area with future population growth being delivered in tandem with mixed-use development, reflective of more self-sufficient settlements. The strategic role of '*urban towns*' in the CDP is stated in table 2.5 of the Draft CDP with a key emphasis on utilising underutilised sites near town centres.

City Area	Role in the Core Strategy	Some Key Sites	Key Deliverables
Urban Towns	Phased delivery of strategic sites by targeting growth proportionate to the existing population within the four urban towns. All development shall focus on prioritising walking, cycling and public transport use. Apply a mixed-use approach to regenerating key underutilised locations. Use a range of designs and densities that reflect and enhance the individual character of each town.	Expansion of South Ballincollig (Maglin), South Glanmire (Ballinglanna). Opportunities to repurpose underutilised sites within town centres.	1. Framework plans for South Ballincollig and South Glanmire. 2. Heritage led plans for Blarney and Tower. 3. Action plans for key sites (Neighbourhood Development Sites). 4. Plan for the long-term delivery.

Figure 01.2 Table 2.5: Summary of Key Objectives for City Growth – Draft CDP

While our clients support the ambitious housing and population targets for Tower set-out in the Draft CDP, they consider the Plan fails to recognise the need to expand on the existing commercial and retail opportunities in the town. Specifically, it is considered that paragraph 10.293 of the Draft CDP, which states that Tower does not require any additional retail floorspace, is incompatible with the towns projected

¹ Along with Blarney, Ballincollig and Glanmire

population growth targets, key objectives of the Draft CDP and a 'settlement specific' retail analysis for Tower.

This submission provides a comprehensive retail impact analysis specific to Tower and its wider catchment, demonstrating the current retail provision in the settlement is insufficient. Given the projected population growth of the settlement during the lifetime of the forthcoming CDP, this deficiency will be further compounded into the future, negatively impacting the future sustainable growth of the town. We consider it is necessary for the 2022-2028 City Plan to identify other lands within the settlement to accommodate future 'mixed-use' growth, to avoid demonstrable current trends of a leakage of economic and retail activity from Tower, and to serve its large rural catchment.

01.2.2 SITE CONTEXT

The subject lands are identified within the 'settlement boundary' and 'existing built-up area' of Tower in the current Blarney Macroom Municipal District LAP 2017 (LAP). The subject site is located immediately adjacent to an existing bus stop which serves as the terminus for the no. 215 Cloghroe – Jacobs Island bus route. CMATS defines the 215 no. route as one of the 'existing high frequency bus services' in the Cork Metropolitan Area with a service every 30 minutes. Tower is identified as forming part of Cork's BusConnects Network in CMATS, which will significantly improve the bus service and network.

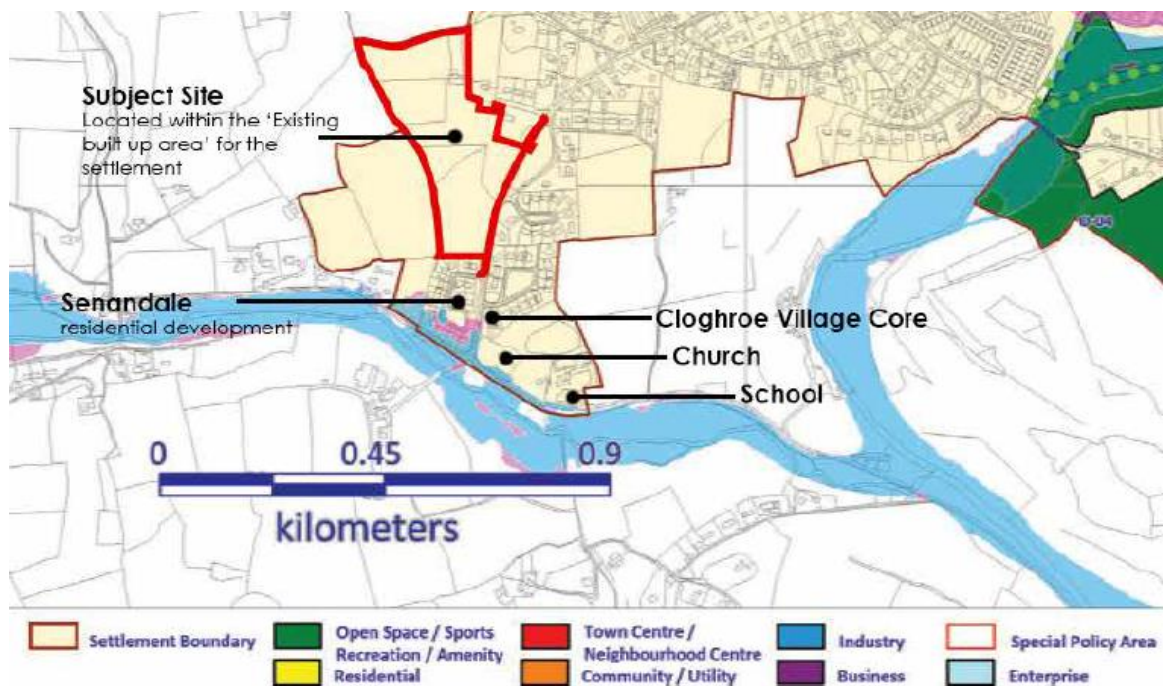


Figure 01.3 Site Location in current LAP

The subject site is within walking distance (approximately 800m) of Tower town centre. Tower consists of a number of shops, pubs, restaurants, doctors surgery, pharmacy, physiotherapist ect. The site is also within 200-300 metres northwest of Cloghroe Neighbourhood Centre, containing Cloghroe National School, Cloghroe Church, post office, pharmacy, beauticians and fitness studio. A Connectivity Map prepared by HW Planning accompanies this submission (Appendix A) which demonstrates the sites location relative to the existing amenities and services in the settlement.

The lands remain within the defined settlement boundary of Tower in the Draft CDP. However, the site is situated within a wider ZO-02 (tier 2) residential zoning objective of the Plan which aims to:

“to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.”

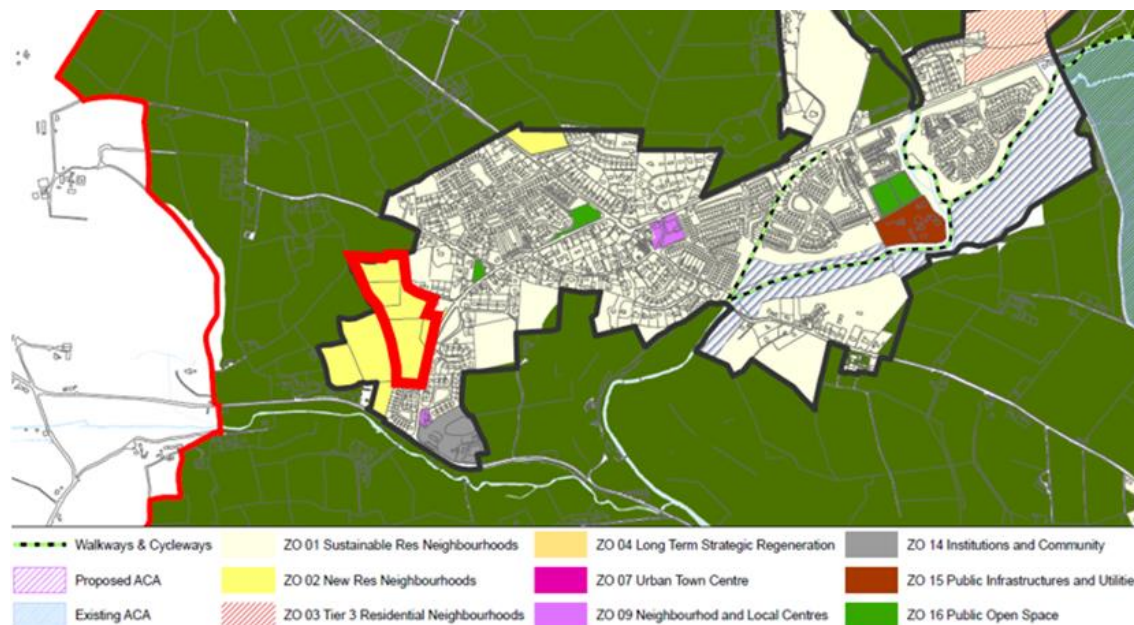


Figure 01.4 Site Location within ZO-02 Objective in Draft CDP.

The Planning Authority will note that Cloghroe Development Limited are currently advancing with plans for a mixed-use Strategic Housing Development (SHD) at the subject lands. A Section 247 meeting took place on 5th November 2020 regarding the development and subsequent tripartite meeting with An Bord Pleanála on 5th March 2021². The development consists of a mixed-use residential/retail development with retail food store (of 1,315 m² net floor area) and café in the southern areas of the site serving as an extension of the existing Cloghroe Neighbourhood Centre. The proposed development will also include a suite of public realm upgrades including the relocation of the existing bus stop and delivery of signalised pedestrian crossing, cycle lanes and footpaths which will benefit all existing and future residents of Tower/Cloghroe in accessing public transport services. The Boards Opinion was subsequently issued in March 2021³. It is envisaged that the SHD, which will be accompanied by an Environmental Impact Assessment Report (EIAR) will be submitted during October 2021.

The Planning Authority will note that a Retail Impact Assessment (RIA) was prepared and accompanied the Section 5 Pre-Application Consultation Request to An Bord Pleanála. The Board raised no objection in principle to the provision of a retail development at the subject site and advised that a 'Retail Impact Analysis' accompany the future SHD application. In the interests of clarity, the proposed site plan relating to the proposed retail development is attached in Appendix C.

² ABP Reference 308980-20

³ Appendix B

01.2.3 LOCAL RETAIL CONTEXT

There are currently two neighbourhood centre areas within Tower/Cloghroe providing a range of small-scale local services reflective of its traditional function as a village settlement. Within the settlement there are currently 3 no. convenience retail outlets, all of which serve differing purposes. Cloghroe Stores serves as a newsagent as well as the local post office while the Daybreak/Circle K functions primarily as the local service station while also acting as a newsagent. O'Learys SuperValu reflects a larger supermarket more suited to household grocery shopping.

Due to Towers location, the settlement provides for a large rural hinterland for the provision of local services. Tower serves as the most convenient location for household retail shopping for rural areas to the north and west such as Cloghroe Upper, Maethy, Inniscarra, Donoughmore, Berrings, Dripsey and Courtbrack. Tower's importance as a retail centre for a large rural catchment is amplified by the limited retail provision in Blarney which contains a number smaller to medium sized retail outlets, however no significantly sized supermarket is provided for in the settlement.

The current deficit in convenience retail provision in the area results that people living within the hinterland of Tower, often travel further afield to urban centres such as Blackpool and Ballincollig to conduct their grocery and retail shopping. This encourages unsustainable and unnecessary travel patterns.

01.2.4 SUBMISSION REQUEST

This submission requests that the southern portion of the subject lands, (subject to the retail element of the future SHD) be included within an extended ZO-09 objective for 'Neighbourhood and Local Centres' uses. This would effectively represent an extension of the existing Neighborhood Centre at Cloghroe which includes Cloghroe Stores, post office, pharmacy and other local businesses.

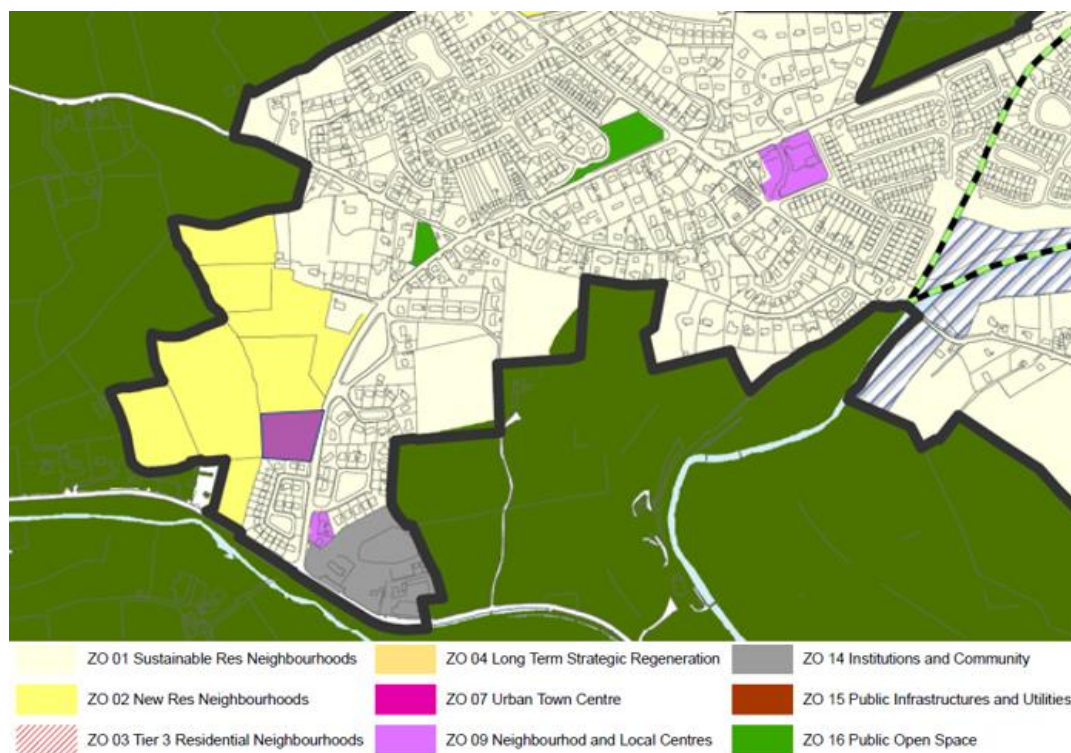


Figure 01.5 Proposed Zoning Map

We consider the subject lands should be included within an extended ZO-09 'Neighbourhood and Local Centre' objective for the following reasons.

- Tower is now included within the functional area of Cork City Council and has been classified as an 'urban town' in the settlement hierarchy of the Draft Cork City Development Plan. There is a demonstrable retail need in the settlement based on current trends and projected population growth for the settlement.
- The Retail Impact Assessment, which accompanies this submission provides evidence of the need for additional retail services to serve the settlement and its hinterland.
- Failure to provide for additional retail services will result in overtrading in existing stores or the leakage of expenditure outside of the settlement, which will result in unsustainable travel patterns.
- Towers categorisation as a level 4 settlement in the retail hierarchy of the Draft CDP is incompatible with the settlements functional role as an 'urban town'. It is considered that Tower has been overlooked in terms of future retail and economic growth in the Draft CDP which will contribute to unsustainable travel patterns which typify the settlement.
- As demonstrated in this submission the delivery of future additional retail floor space in Tower will not negatively impact any future retail development being delivered in Blarney.
- The subject site represents the most appropriate location for the expansion of the settlements retail and commercial growth. Future development at the site will consolidate the Cloghroe Neighbourhood Centres role as an important local commercial node and reduce dependency on other settlements such as Ballincollig for retail provision.

02 Planning Policy Context

02.1 Project Ireland 2040 – National Planning Framework (NPF)

Section 2 of the NPF calls for significant ambition to realise the potential of places, and within this, the need to accommodate growth within key settlements to lead the development of their regions, and complement the role of Ireland's main cities including Cork. Chapter 4 of the NPF 'Making Stronger Places' aims to enhance people's experience of living and working in and visiting urban places. This message is reflected in a number of the NPF's National Planning Objectives (NPO's). In particular NPO's 4, 5, 6, 7 and 11 all promote the sustainable growth of existing urban settlements including supporting the continuation of balanced population and employment growth in more self-contained settlements.

Appendix 3 of the NPF specifies a new tiered approach to the identification of lands for future development. 'Tier 1: Serviced Zoned Land' refers that lands serviced by existing infrastructure should be prioritised for development and should be considered as part of the plan making process by Local Authorities. Tier 1 lands are generally located within built-up footprint of a settlement or contiguous to existing developed lands.

02.2 Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES's overall strategy for the future development of the region is based around the pillars of the three cities of Cork, Limerick and Waterford and the preparation of guiding Metropolitan Area Strategic Plans (MASP) for these city regions. Regarding 'Compact Growth in Metropolitan Areas' Regional Policy Objective (RPO 10) aims to;

- a) *Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.*
- b) *Deliver design briefs for strategic sites;*

The RSES specifies that the enhanced roles of existing towns and villages will be a critical component in achieving the goals and objectives of the RSES. Specifically, Regional Policy Objective (RPO) 26 of the RSES aims to;

- a) *to strongly support strengthening the viability of our towns and rural settlements, as a key objective of the RSES,*
- d) *To ensure that development plans tailor the appropriate planning response by reference to the scale, nature and location of the settlement. Local authorities will identify settlements which can play an enhanced role at sub-regional level to drive the development of their area;*

Regarding the provision of future retail development RPO 55 states it is an objective to:

- a) *Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations in regeneration /public realm projects and other measures;*
- c) *Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category;*

The RSES places a significant emphasis on quality placemaking and the creation of new sustainable neighborhoods. RPO 176 '10 minute City and Town Concepts' aims to.

"attain sustainable compact settlements whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services".

Tower is situated within the Cork MASP region. Cork MASP Policy Objective 1 states the following overall objectives for the Cork MASP area;

- d) *The Cork MASP allows flexibility to respond to changes in planning policy, infrastructure requirements and prioritises that will arise in the area which will be added to Cork City as a result of the boundary extension.*
- e) *Support communities in Metropolitan Towns..... seek vibrant metropolitan communities with a high quality of life, mixed uses and services and seek the infrastructure led sustainable compact growth of metropolitan settlements.*

Cork MASP Policy Objective 16

Retail

a. Support the role of Metropolitan Cork as a Level 1 location for retail provision and the retail hierarchy for as identified in the Metropolitan Cork Joint Retail Strategy 2013 which identifies:

- **Level 1:** Metropolitan Cork: Cork City Centre
- **Level 2:** Large Metropolitan Towns: Ballincollig, Carrigaline, Cobh and Midleton.
- **Level 2:** District Centres: Blackpool, Douglas, Wilton, Mahon Point, Ballyvolane, Cork Docklands, Hollyhill.
- **Level 3:** Smaller Metropolitan Towns: Carrigtwohill, Glanmire, Passage West, Blarney, Monard.

- **Level 4:** Neighbourhood Centres and Large Village Centres.
- **Level 5:** Local centres, corner shops and smaller villages.

b. Support the role of the Metropolitan Cork Joint Retail Strategy and seek further preparation of joint retail strategies for Metropolitan Cork between Cork City Council and Cork County Council in accordance with Section 2B Retail Planning Guidelines for Planning Authorities (2012).

Regarding the role of retail, Cork MASP Policy Objective 16 outlines the retail hierarchy as shown.

02.3 Metropolitan Cork Joint Retail Strategy 2015 (MCJRS)

The MCJRS is the joint retail strategy prepared by Cork County Council and Cork City Council which has been incorporated into the current County and City Development Plans. Tower is categorised as a Level 4 'Neighbourhood Centres and Large Village Centre' in the retail hierarchy of the MCJRS. Section 4.9 of the MCJRS states these centres;

"provide important top up and day to day shopping and retail service requirements. They are typically characterised by an appropriately scaled

convenience offer and ancillary retail services and serve a small localised catchment population.”

This is enshrined in Policy 6 of the strategy which states the role of Neighbourhood Centres and Large Village Centres is;

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

02.4 Draft Cork City Development Plan 2022-2028 (Draft CDP)

The Draft CDP is based on a number of key strategic principles identified in Section 1.5 of the Plan including:

Compact growth - Integrate land-use and transport planning to achieve a compact city with 50% of all new homes delivered within the existing built-up footprint of the City on regenerated brownfield, infill and greenfield sites identified in the Core Strategy, and to achieve higher population densities aligned with strategic infrastructure delivery.

A city of neighbourhoods and communities - Develop a sustainable, liveable city of neighbourhoods and communities based on the 15-minute city concept, ensuring that placemaking is at the heart of all development.

A strong and diverse economy - Support Cork City's role as the economic driver for the region and the creation of a strong, resilient, diverse and innovative economy.

Strategic Objective SO1 – Compact Liveable Growth aims to:

“Deliver compact growth that achieves a sustainable 15 minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city.”

Core Strategy Objective 2.10 'Mix of Uses' aims to:

“Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.”

Section 7.83 of the Draft CDP outlines the Retail Hierarchy of the 'Draft Cork City Council and Cork County Council Joint Retail Strategy' which is being prepared to coincide with the preparation of new County and City Development Plans. Despite being one of only four 'Urban Towns', Tower is identified as a Level 4 'Neighbourhood/Local Centres and Large Village Centres' on the retail hierarchy with the other urban towns of Ballincollig, Glanmire and Blarney all identified as Level 2/3 settlements. Regarding 'Neighbourhood and Local Centres', Objective 7.30 of the Draft CDP aims to:

To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. It is also aimed to support and facilitate the designation of new Neighbourhood and Local Centres where

significant additional population growth is planned or where a demonstrable gap in existing provision is identified, subject to the protection of residential amenities of the surrounding area and that they are adequately served by sustainable transport. Proposals should demonstrate the appropriateness of the site by means of a Sequential Test, demonstrate retail impact and provide for a mix of uses appropriate to the scale of the centre.

Regarding 'retail and ancillary services' in Tower paragraph 10.293 of the Draft CDP states:

'The Draft Cork City Council and Cork County Council Joint Retail Strategy suggests that Tower does not require additional retail floorspace during the Plan period and that the existing shopping centre and the nearby Cloghroe village centre will continue to be the principal location for future retail development and that it will continue to be limited to small scale convenience uses.'

Regarding ZO-09 'Neighborhood and Local Centres, the Draft CDP provides the following objectives.

Objective ZO 9.1 – *"Neighbourhood and Local Centres contribute to sustaining liveable communities and neighbourhoods by fulfilling a local convenience retail, employment and service function, providing a mix of uses and range of services, at an appropriate local scale, to the local population often within a 5- or 10- minute walking distance."*

Objective ZO 9.2 – *"Neighbourhood and Local Centres provide for local convenience shopping, however lower-order comparison shopping may also be open for consideration commensurate to the scale and character of the local centre and its function in the neighbourhood.....Neighbourhood and Local Centres should also include residential uses, particularly at higher densities that contribute to sustainable compact growth. These can be delivered particularly above ground floor level."*

Objective ZO 9.3 – *"Development proposals in this zone must serve local needs and must demonstrate how the proposal would respect, reflect or contribute to the character and vibrancy of the particular Neighbourhood and Local Centre, commensurate with the nature and scale of the development. Developments must deliver a quality urban environment and public realm with a focus on accessibility and permeability."*

03 Assessment

03.1 Consistency with National, Regional and Local Planning Policy

The inclusion of the subject lands within the ZO-09 'Neighborhood and Local Centres' objective is consistent with national and regional objectives identified in the NPF and RSES. The delivery of a 'mixed-use' neighbourhood at the site comprising retail and commercial uses to the south and residential development in upper areas is consistent with the 10-minute minute City and Town Concept promoted by the RSES.

RPO 10 of the RSES seeks to *"prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling."* As referenced previously, the future SHD development to be submitted at the lands will provide for range of public realm and connectivity improvements enhancing pedestrian and cyclist mobility in Tower. These upgrades will also have the added benefit of allowing enhanced access to the existing bus stops on the R617 within the wider settlement and from the proposed retail development itself.

Future development at the subject lands providing for mixed use residential and retail development is also consistent with RPO 55 of the RSES. As evidenced in section 3.2 of this report, retail development in the southern areas of the site satisfies the 'Sequential Test' for future retail development and will positively contribute to the local economy and vibrancy of the settlement.

We consider that Towers designation as a Level 4 *'Neighbourhood/Local Centres and Large Village Centre'* in the *'Draft Cork City Council and Cork County Council Joint Retail Strategy'* is incompatible with Towers overall strategic objective as an 'Urban Town' settlement in the Draft CDP. As referenced previously, Tower is the only 'urban town' not identified as at least a level 3 *'Small Metropolitan Town Centre'* location in the retail hierarchy of the Draft CDP. This is despite that Tower currently has a greater population than Blarney which is a level 3 settlement. We consider that unless Towers strategic role on the retail hierarchy is reassessed, it will lead to continued negative and unsustainable travel patterns for commercial and retail activity which the settlement has capacity to absorb at present.

Notwithstanding, we consider the extension of the ZO-09 objective which includes Cloghroe Neighbourhood Centre to the east is consistent with core objectives in the Draft CDP relating to the location of mixed-use developments proximate to high frequency public routes and the creation of compact settlements.

Strategic Objective SO1 of the Draft CDP aims to create '15 minute neighbourhoods' where people can live, work and utilise public transport opportunities. The delivery of a future mixed-use neighbourhood at the subject lands which delivers residential and reflective retail/economic growth is consistent with this vision. The consolidation of the Cloghroe Neighbourhood Centre as an important local commercial node will assist Tower in fulfilling its strategic function as an 'urban town', which serves a primary service/retail centre for its large rural catchment to the north and west.

03.2 Compliance with Retail Policy and Guidelines

The 2012 Retail Planning Guidelines (RPG) recognise the importance of retailing to the economies of small towns and villages and promotes the sustainable expansion of retail uses in these settlements. Specifically, paragraph 4.11.5 of the RPG, 'Retailing in Small Towns and Villages' states;

"Where appropriate, the maximum size of store, consistent with maintaining a variety of shops in the centre of these towns and villages and protecting an appropriate level of retail provision in the rural area, should be identified. In general there should be a clear presumption stated in favour of central or edge-of-centre locations for new developments."

The RPG's are focused around five key policy objectives, namely:

- Ensuring that retail development is plan led.
- Promoting city/town centre vitality through a sequential approach to development.
- Securing competitiveness in the retail sector by actively enabling good quality development proposals to come forward in suitable locations.
- Facilitating a shift towards increased access to retailing by public transport, cycling and walking in accordance with the Smarter Travel strategy and
- Delivering quality urban design outcomes

It is considered an appropriate expansion of the retail provision in Tower and the sites inclusion within an extended ZO-09 objective is consistent with these key policy objectives. In identifying suitable locations for future retail expansion there are a variety of factors which need to be considered including the '*sequential approach*' whereby generally, retail development should be prioritised in city and town centre locations. '*Edge of centre*' locations may be appropriate where it can be demonstrated that there are no potential sites including vacant units within a city or town centre that are suitable, available and viable.

An analysis of the available lands in the Tower confirms the subject lands are the most proximate undeveloped and available lands to the existing town centre. The provision of future retail development in this area is appropriate as it would provide an opportunity to expand the existing Cloghroe neighbourhood centre and provide a balance to the settlement in terms retail provision with Tower Neighbourhood Centre to the east of the settlement. The provision of additional retail uses in Tower/Cloghroe would also cater for anticipated future housing and population growth within the settlement and its significant hinterland, reflecting an integrated approach between the delivery of relevant services with projected population growth.

This is a consideration promoted by the SRDUA and specifically section 2.15 'Anticipating Future Needs' which states;

"Distinctive small towns and villages perform different functions and new development might spark the need to strengthen existing functions such as the need for additional retail capacity to facilitate new residential development. In such cases, consideration should be given to how to make adequate provision for such additional retail functions in central locations as

well as considering the new residential development that may give rise to such additional requirements.”

Expanding the existing retail provision in Tower will improve the competitiveness within the local retail sector providing increased options for the local population. Tower/Cloghroe is currently served by the 215 no. Cloghroe – Jacobs Island bus route providing a service every 30 minutes to urban and employment centres of Blarney, Blackpool, City Centre and Mahon. The publication of the Cork Metropolitan Area Transport Strategy (CMATS) indicates this route is included within the ‘Core Radial Bus Network’ suggesting that the route is poised to benefit from an improvement in the frequency of bus services and potentially operate at a frequency of 15 minutes or better. The delivery of additional retail development is well placed to capitalise from the existing public transport provision and future improvements to the bus network as proposed under CMATS.

03.3 Retail Impact Assessment

Section 4.9 of the RPG’s describes the relevant criteria to be assessed in the preparation of an RIA. Within the RIA, it must be demonstrated whether or not the provision of additional retail uses would:

Criteria	Assessment in the Context of Tower/Cloghroe
Support the long-term strategy for city/town centres as established in the retail strategy/development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres	Improving the convenience retail provision in the town of Tower will provide long term benefits to the settlement. Increased choice in retail outlets will improve the local economy of the settlement and is consistent with the towns upgrade within the settlement hierarchy from a ‘key village’ to an ‘urban town’.
Have the potential to Increase employment opportunities and promote economic regeneration	The provision of additional retail uses and the expansion of the Cloghroe Neighbourhood Centre in particular, provides excellent potential to provide employment opportunities locally. As referenced in the Draft CDP, Tower exhibits high levels of car dependency indicating that despite a significant population in the settlement, there are few employment opportunities locally. The expansion of the retail sector within the town serviced by regular public transport links provides an opportunity to enhance the economy and employment opportunities in the settlement and promote sustainable commuting patterns.
Have the potential to increase competition within the area and thereby attract further consumers to the area	Providing additional retail floorspace in Tower will improve local competitiveness within the retail sector and benefit the local economy as a whole. At present it is evident the present comparison retail provision in Tower is deficient for its inhabitants and those in its large rural hinterland. This has resulted in a leakage in potential retail activity from the town to other settlements such as Blarney, Ballincollig and Blackpool. Expanding commercial and retail provision in Tower is necessary to reflect its status as an ‘urban town’ settlement.

Respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support	As referenced, there is currently a leakage of potential economic and retail activity from the town, which it is losing to other urban centres. The appropriate increase of convenience retail floorspace in Tower will assist in reversing this trend and respond to local demand.
Cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent developments or other outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community	Enhancing the retail provision in Tower will not result in any negative effects on the wider functions of Tower. Rather it is considered that the recent performance of the settlement in terms of new residential units in the pipeline, requires an appropriate increase in retail provision. Due to the evidenced demand for additional retail uses in the area, the provision of an appropriate increase in retail floorspace in Tower will not negatively other existing and proposed urban centres including Blarney and Stoneview Urban Expansion Area. Notwithstanding this, the lack of certainty around the timeline of the delivery of Stoneview and the ambitious population targets set for the City over the next 20 years requires relevant infrastructure and services to be delivered in the short term.
Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;	It is objectively considered that any reasonable expansion in retail provision in Tower/Cloghroe will not result in any increase in commercial vacancy in the settlement. Each of the existing retail outlets in the settlement has its own specific functions (e.g. newsagents/post office, service station and local supermarket) reflecting a broad range of local retail functions. It is concluded that there is capacity to cater for a further intensification of retail uses in the town and would not result in any negative effects to the existing retail provision.
Ensure a high standard of access both by public transport, foot and private car so That the proposal is easily accessible by all sections of society; and/or link effectively with an existing city/town centre so that there is likely to be commercial synergy	Tower/Cloghroe is well served by a public transport link in he 215 no. bus route which leaves Cloghroe every 30 minutes. As referenced in CMATS it is anticipated that the frequency of this service will improve in time.

We note that Towers position as a level 4 settlement on the Draft CDP retail hierarchy has been informed by the '*Draft Cork City Council and Cork County Council Joint Retail Strategy*'. The Draft Joint Retail Strategy is a strategic level assessment of the retail environment of various settlements in the Cork Metropolitan Area. The strategy does not provide a specific retail assessment regarding the current or future retail capacity of Tower.

This section has been prepared to assess the retail impact of the proposed retail unit of 1,315 m2 (net sales area) which will be included within the future SHD application at the subject lands. In summary the Retail Impact Analysis confirms that.

- it can be assumed that currently there is a current leakage of retail activity from the settlement to other urban centres, contributing to the car dependency figures referenced previously. This trend is likely to continue given the anticipated population growth of the settlement to occur in the coming years.
- It is considered that an additional convenience supermarket outlet is required to reverse this occurrence and contribute to a more self-sufficient settlement.
- Based on a conservative population growth forecast of 1%, Tower will support 2,724m² of additional convenience floorspace by 2031. In the event of a 2% growth scenario Tower and its catchment could support 4,196 m² by 2031.
- That the projected population growth rates for Tower in the Draft CDP requires that additional commercial and retail floor space needs to be delivered to support the local population.

03.3.1 RETAIL CATCHMENT

The retail catchment of Tower/Cloghroe was established by a desktop approach using Census 2016 small area data and based on existing and expected consumer behavior. The catchment was validated by site visits and visual inspections. The starting point for catchment definition was a 5-minute drivetime of the proposed development site, this area was then modified to exclude areas within 5 minutes drivetime of Blarney, with the exception of those areas within Tower, which are more likely to be served by the settlement itself. The Tower/Cloghroe catchment was also reduced to the south in areas which would naturally be served by the urban town of Ballincollig. Conversely, the catchment was expanded to the west and north to a 15-minute drivetime, to reflect the absence of other convenience retail stores in these areas. It was considered that Tower serves as the most convenient location for household retail shopping for the rural areas such as Matehy, Inniscarra, Donoughmore, Berrings, Dripsey, Firmount, Kerry Pike, New Tipperary, Stuake and Courtbrack

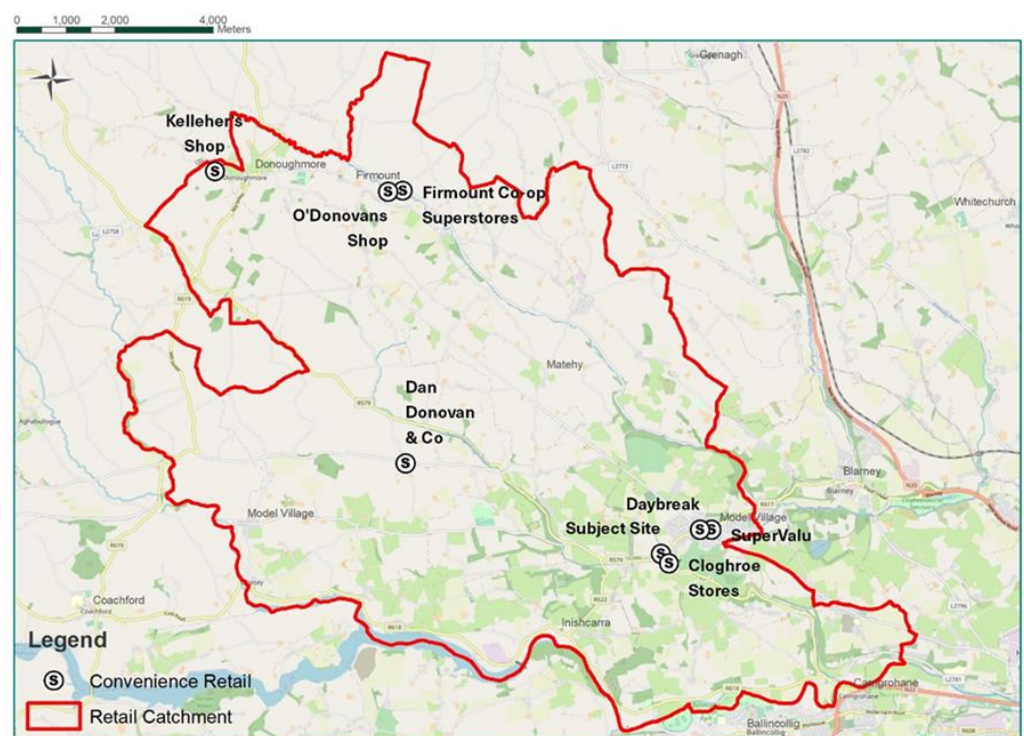


Figure 03.1 Retail Catchment

03.3.2 CATCHMENT POPULATION

The retail catchment as defined in Figure 3.1 has been correlated with CSO small area statistic boundaries and includes the 29 small areas as identified in Appendix D. As previously noted, the population of the census settlement of Tower has grown significantly (c. 86%) since 1996. Exceptional growth occurred between 1996 and 2002 and this was sustained up to the most recent 2016 census when the population increased by 3.4%.

Figures from the 2011 and 2016 Census indicate a trend of stronger growth in the retail catchment area with a population increase of 5.1%, significantly above the average rural population increase of 2% as recorded in Census 2016.

Census	1996	2002	% Change	2006	% Change	2011	% Change	2016	% Change
Tower (CSO Settlement)	1841	3032	65%	3102	2.3%	3306	6.6%	3421	3.4%

Figure 03.2 Population Growth in Tower Settlement





	2011 Census	2016 Census	Change	% Change
Retail Catchment	8703	9148	445	5.1





Figure 03.3 Population Growth in Retail Catchment

03.3.3 SETTLEMENT ANALYSIS

Site visits to the settlements within the catchment were carried out on the 05/12/2020 /during the late morning to early Afternoon. The 12 settlements were visited to establish the existing quantum of convenience retail in the area. The results of these site visits are presented in figure 3.4 below. The extent of existing convenience retail within the catchment was found to be minimal and with the exception of the Cloghroe/Tower settlement and to some extent Berrings. Retail provision in the catchment generally consists of privately run corner shops in units of less than 50 m2.

Several settlements have no retail offer, while others have vacant retail premises which appear to have been closed for some time. The Joint Retail Study estimated a total convenience retail floor space in Tower of 978m2. Planning permission was granted in 2016 for the expansion of the SuperValu (then Centra) store from c. 825m2 to 1,232m2 (net). A conservative estimate of total existing convenience floorspace within the identified catchment is approximately 1,752 m2. The following section defines the location, scale and nature of the existing retail outlets within the catchment and which provide for the total convenience floor area of 1,752 m2.

Settlement	Description & Map	Size (m ²) Approx.
Cloghroe/Tower	<p>O'Learys Super Valu, Kilnamucky, Tower, Co. Cork, T23 W968</p> <p>Super Valu Store</p> <p>Also physiotherapist, florist, beauticians and pharmacy</p>	1232
		
	<p>Cloghroe Stores & Post Office, Woodlands, Cloghroe. T23 E446</p> <p>Part of Cloghroe Neighbourhood Centre. Also a pharmacy, beauticians/hairdressers .</p>	150
		
	<p>O'Learys Daybreak, Kilnamucky, Tower T23 HY50</p> <p>Circle K Fillings Station</p>	150

		
Kerry Pike	No retail outlet in settlement	
Matehy	No retail outlet in settlement	
Berrings	<p>Dan Donovan & Co. Ltd. Ballyshoneen, Berrings, Co. Cork, P12 R820</p> <p>Filling Station</p> <p>Some everyday household supplies. Primarily sells hardware & agricultural products</p>	70
		
Courtbrack	No retail outlet in settlement. One previously existent local convenience store which has been closed for a number of years. Courtbrack General Stores - Currently in office use – Eircode T23 AK66	
Firmount/Fournaght	<p>Firmount Co-op Superstores Firmount, Donoughmore, Co. Cork, P32 FH59</p> <p>Co-op outlet selling hardware and agricultural products</p>	50





		
	<p>O'Donovan's Shop, Firmount, Donoughmore, Co. Cork. P32 YX88</p> <p>Small local shop selling household items.</p>	50
		
Cloghroe Village	No retail outlet in settlement	
New Tipperary	No retail outlet in settlement	
Donoughmore	No retail outlet in settlement	
Stuake	<p>Donoughmore Post Office & Kelleher's Shop, Stuake P32 XF82</p> <p>Post office and local convenience shop</p>	50



Figure 03.4 Convenience Retail Premises within defined catchment

03.3.4 ASSESSMENT OF CAPACITY

The projected convenience spending for the retail catchment is calculated by multiplying the population forecast by per capita expenditure. An assessment of spending patterns (existing & projected) is an important parameter in establishing retail impact in the study area. The per capita expenditure on convenience goods can be projected based on an extrapolation of the Metropolitan Cork Joint Retail Study, as summarised in figure 3.5 below. The Study envisaged a growth rate in Per Capita Expenditure of 1% per annum.

Year	Per Capita Convenience Expenditure
2011	€3,876
2016	€3,993
2022	€4,239
2031	€4,636

Figure 03.5 Per Capita Expenditure

The 2016 population of the Tower/Cloghroe retail catchment was determined as 9,148 persons in 2016. Conservative growth scenarios of 1% and 2% were used to project population growth to the target years of 2022 and 2031. By applying the per capita spending to the existing and projected population levels for the catchment area the total expenditure for convenience goods is calculated. Figures 3.5 and 3.6 outline the estimated convenience spending available within the catchment area based on these growth rates.

Estimated per Capita Convenience Expenditure in Catchment Area – Based on a 1% Population Growth Scenario and 1% per annum increase in convenience expenditure

Year	Population of Catchment	Per Capita Expenditure (€)	Estimated Expenditure (€m)
2016	9148	3993	€ 36.53
2017	9239	4033	€ 37.26
2018	9332	4073	€ 38.01
2019	9425	4114	€ 38.78
2020	9519	4155	€ 39.55
2021	9615	4197	€ 40.35
2022	9711	4239	€ 41.16
2031	10621	4636	€ 49.23

Figure 03.6 Projected per capita expenditure based on 1% population growth

Estimated per Capita Convenience Expenditure in Catchment Area – Based on a 2% Population Growth Scenario and 1% per annum increase in convenience expenditure

Year	Population of Catchment	Per Capita Expenditure (€)	Estimated Expenditure (€m)
2016	9148	3993	€ 36.53
2017	9331	4033	€ 37.63
2018	9611	4073	€ 39.15
2019	9899	4114	€ 40.73
2020	10196	4155	€ 42.37
2021	10502	4197	€ 44.07
2022	10817	4239	€ 45.85
2031	14114	4636	€ 65.43

Figure 03.7 Projected per capita expenditure based on 2% population growth.

The overall convenience retail floorspace within the catchment is currently c.1,752 m². The Joint Retail Study indicates that a turnover of €11,000 per square metre should be

assumed for future convenience space, this figure is used therefore to calculate existing turnover, resulting in a figure of €19.27 million.

03.3.5 POPULATION UNDER-ESTIMATE

There are currently 202 no. new houses under construction in the settlement and 21 no. further houses have been granted planning permission. These have not been included in the population estimates for the catchment. This assessment does also not assess any residential units to be delivered within any future SHD application at the subject lands. A summary of all significant planning applications for residential development which have occurred in Tower since the adoption of the LAP is provided in figure 3.8 as shown.

Application Ref:	Applicant(s)	Date Received	Description	Outcome/Current Status
Cork City Council Ref: 20/39202	Tower Residential Developments Limited	25/03/2020	Construction of 37 no. dwelling houses	Final permission granted on 19th May 2021. Construction has recently commenced on site.
Cork City Council Ref: 19/39001	Gleann Fia Homes Ltd.	20/12/2019	Phase 2 development at Gleann Fia - The construction of 40 no. dwelling houses	Final permission granted on 06/01/2021. Construction has commenced on site.
Cork County Council Ref: 19/4718	Whitebon Developments Ltd	25/03/2019	Construction of 12 no. dwelling houses	Final permission granted by Cork County Council on 08/08/2019. Construction has commenced on site.
Cork County Council Ref: 18/7111	Hydro Estates Ltd	29/11/2018	Construction of nursing home, 21 no. dwelling houses.	Conditional permission granted by Cork County Council on 13/08/2019. Permission subsequently granted for 21 no. units and a nursing home following submission of third party appeals to An Bord Pleanála (Ref: ABP-305373-19).
Cork County Council Ref: 18/5562	Gleann Fia Homes Ltd	15/06/2018	Construction of 60 no. dwelling houses.	Conditional permission granted by Cork County Council on 25/10/2018 for 60 no. units. Currently at appeal with An Bord Pleanála (Ref: ABP-303016-18) following the submission of first and third party appeals.
Cork County Council Ref: 17/7253	Muskerry Homes Ltd	13/12/2017	Construction of 54 no. dwelling houses.	Permission granted by Cork County Council for 54 no. dwellings on 27/11/ 2018. Construction has commenced on site.

Figure 03.8 Recent Planning Activity in Tower.

03.3.6 RETAIL CAPACITY

Based on the population extrapolations and data sourced from the Joint Retail Strategy, the convenience retail capacity of the retail catchment has been calculated for 2022 in figure 3.8 and for 2031 in figure 3.9 below.

	Retail Capacity 2022	1% pop growth	2% pop growth
A	Projected Convenience Expenditure Per capita (€)*	4239	4239
B	Total population of catchment	9711	10817
C	Total available expenditure within catchment (€) (AxB)	€ 41.16	€ 45.85
D	Estimated existing convenience floorspace within catchment	1752 sq. m	1752 sq. m
E	Assumed convenience turnover ratio for county/ m ² *	€11,000	€11,000
F	Estimated Existing Expenditure (€m) within Catchment based on Convenience Retail Floorspace (DxE)	€19.27	€19.27
G	Residual Expenditure (€m) (C – F)	€ 21.89	€ 26.58
H	Spare capacity available (G/E) (m ²)	1,990	2,416

Figure 03.9 2022 Retail Capacity of Catchment

	Retail Capacity 2031	1% population growth	2% population growth
A	Projected Convenience Expenditure Per capita (€)*	4636	4636
B	Total population of catchment	10621	14114
C	Total available expenditure within catchment (€) (AxB)	€ 49.24	€65.43
D	Estimated existing convenience floorspace within catchment	1752 sq. m	1752 sq. m
E	Assumed convenience turnover ratio for county/ m ² *	€11,000	€11,000
F	Estimated Existing Expenditure (€m) within Catchment based on Convenience Retail Floorspace (DxE)	€19.27	€19.27
G	Residual Expenditure (€m) (C – F)	€ 29.97	€ 46.16
H	Spare capacity available (H/F) (m ²)	2,724	4,196

As demonstrated in figure 3.9, based on a modest population growth scenario of 1% by 2022 there will be spare capacity within the retail catchment to support additional convenience floorspace of 1,990 m². Given the population underestimate inherent in these calculations as referred to Section 3.2.5, these figures are considered to be conservative. If a 2% population growth scenario is considered this rises to 2,416m².

By the year 2031 it is envisaged that the 1% growth scenario will support 2,724m² of additional convenience floorspace and the 2% growth scenario would support 4,196 m².

As evidenced from the above '*settlement specific*' retail analysis for Tower, the settlement not only has capacity to accommodate additional retail development, but it is also in the interests of the sustainable growth of Tower to facilitate the provision of additional retail floorspace during the lifetime of the forthcoming plan. The subject lands represent the most appropriate location to deliver such growth and provides an opportunity to provide a new mixed-use sustainable neighbourhood in Tower with direct access to public transport links.

04 Conclusions

In summary, we request the southern portion of the subject lands be included within a 'ZO 09' neighbourhood and local centres zoning objective with the remainder of the lands remaining identified for future residential use for the following reasons.

- The Retail Impact Assessment, which accompanies this submission provides evidence of the need for additional retail services to serve the settlement and its hinterland.
- Failure to provide for additional retail services will result in overtrading in existing stores or the leakage of expenditure outside of the settlement, which will result in unsustainable travel patterns.
- Towers categorisation as a level 4 settlement in the retail hierarchy of the Draft CDP is incompatible with the settlements functional role as an 'urban town'. It is considered that Tower has been overlooked in terms of future retail and economic growth in the Draft CDP which will contribute to unsustainable travel patterns which typify the settlement.
- As demonstrated in this submission the delivery of future additional retail floor space in Tower will not negatively impact any future retail development being delivered in Blarney.
- The subject site represents the most appropriate location for the expansion of the settlements retail and commercial growth. Future development at the site will consolidate the Cloghroe Neighbourhood Centres role as an important local commercial node and reduce dependency on other settlements such as Ballincollig for retail provision.
- The future delivery of new retail/mixed-use development at the subject lands will contribute to a more self-sufficient and compact settlement. The creation of a new mixed-use neighbourhood at Cloghroe will assist in promoting sustainable mobility and travel patterns in the area, reversing the trend of a car dominated settlement.
- Future retail and residential development at the site will reinforce the Cloghroe Neighborhood Centres local role as an important service hub and provide balance to the future growth of the settlement.

Appendix A

Connectivity Mapping

Appendix B

ABP Opinion 308980-20

Appendix C

Proposed SHD 'Retail' Site Plan

Appendix D

CSO Small Area Statistics – Retail Analysis