



Cork County Development Plan Review

Section 11 Managers Report

Volume I: Managers Key Issues & Recommendations • 29th April 2013





Contents

VOLUME ONE

Section One	Introduction	5
Section Two	Managers Key Issues and Recommendations	9
	Population	11
	Housing Density	15
	Rural Housing	25
	Economy and Employment	29
	Tourism	33
	Retail (including Town Centres)	35
	Energy (including Wind and Renewable Energy)	41
	Green Infrastructure	47





Section One: Introduction

Overview of this Report

The purpose of this report is to provide a description of the initial public consultation undertaken for the review of the Cork County Development Plan and preparation of a new County Development Plan to take effect at the beginning of 2015.

Volume I of the report consists of two sections:

Section 1: Provides an introduction and overview of the report, describes the consultation that was undertaken during the initial (or 'Section 11') consultation phase of the review and details the legislative background and requirements for the report.

Section 2: Provides a detailed discussion of the key issues raised during the consultation and sets out the Manager's opinion and his recommendations on the policies to be included in the draft plan.

This report forms part of the statutory procedure for the preparation of the Cork County Development Plan 2015 and is being submitted to the Elected Members of Cork County Council on the 29th April, 2013 or their consideration on or before the 8th July, 2013.

Volume II "Appendices" of the report consists of a series of six Appendices A to F.

Initial Public Consultation

The initial public consultation stage for the review of the Cork County Development Plan 2009 took place from 7th of January to the 4th of March 2013.

The public consultation stage was advertised through a number of media:

- An advertisement was placed in a number of Newspapers circulating locally;
- A notice was placed on the Cork County Council website;
- Notification was issued through Cork County Council's twitter feed;
- Notification was issued through Cork County Council's Facebook account; and
- Prescribed authorities were notified.

Public Information Events

A series of public information evenings and stakeholder meetings were held in order to provide an opportunity for members of the public to learn about the review process, to highlight some of the strategic issues facing the county and facilitate feedback from the public about issues they felt should be taken into account in the preparation of the draft Development Plan.

Public information evenings were held in the following locations:

- County Hall 29th January 2013
- Quality Hotel, Clonakilty 31st January 2013
- Hibernian Hotel, Mallow 5th February 2013



A report on the issues raised at the public information evenings is included in Volume II Appendix D. Many of the issues raised are addressed in Section 2 of this report and will be considered in more detail in the preparation of the draft plan.

The Section 11 Consultation Document “Planning for Cork County’s Future” was prepared for the purposes of raising awareness of the nature of both the development plan and the review process. The document outlined some of the recent trends in development and likely influences on the next development plan. The preparation of the consultation document was notified in the public advertisements and the paper was made available for download from the County Development Plan review website and for sale from the Planning Policy Unit.

Submissions were invited from the public during the consultation period and could be made electronically (via the Co Council’s Web-site) or sent via post. A total of 103 submissions were received in total. A list of the persons and organisations that made submissions is included in Volume II Appendix C.

Elected Members and the public should note that Section 11(4)(b)(ii) of the Planning and Development Act requires that the issues raised by submissions “relating to a request or proposal for zoning of particular land for any purpose” shall not be referred to in this report. A list of submissions that are affected (either totally or in part) is included in Volume II Appendix E.

Legal Background to the Managers Report

Section 11(4) of the Planning and Development Act 2000-2010 requires that the County Manager prepare a report on the submissions and observations received during the pre draft consultation period and on matters arising out of the consultations made during this phase. The Act requires that the Manager’s Report shall:

(a) List the persons or bodies who made submission or observations as well as any persons or bodies consulted by the authority.

(b) Summarise the issues raised in the submissions and during the consultations, where appropriate but the report shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose.

(c) Give the opinion of the Manager to the issues raised, taking account of:

- The proper planning and sustainable development of the area,
- The statutory obligations of any local authority in the area,
- Any relevant policies or objectives for the time being of the Government or of any Minister of the Government,
- State the Manager’s recommendation on the policies to be included in the draft development plan,
- Summarise the issues raised and recommendations made by the South West Regional Authorities and outline the recommendations of the Manager in relation to the manner in



which those issues and recommendations should be addressed in the draft development plan.

Next Steps

- Under the provisions of Section 11(4)(c) to (f) of the Planning and Development Act, 2000, the Section 11 Managers Report will be submitted to the members of Cork County Council on **Monday 29th April** for their consideration.
- Following the consideration of the report the members of the planning authority, may issue directions to the manager regarding the preparation of the draft development plan, and any such directions shall be strategic in nature, consistent with the draft core strategy, and shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and the manager shall comply with any such directions.
- Any directions shall be issued not later than 10 weeks after the submission of the report i.e. **by 8th July 2013.**
- In issuing directions the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates.
- In accordance with Section 5(a) of the Act the Manager shall, not later than 12 weeks following the receipt of any directions, prepare a draft development plan and submit it to the members of the planning authority for their consideration.





Section Two: Managers Key Issues and Recommendations

Introduction

This section of the report addresses in detail the key issues arising from the submissions that result in recommendations for the policies to be included in the Draft Plan. The main topics addressed are as follows:

- **Population**
- **Housing Density**
- **Rural Housing**
- **Economy and Employment**
- **Tourism**
- **Retail (including Town Centres)**
- **Energy (including Wind and Renewable Energy)**
- **Green Infrastructure**

It should be noted that the issue of Part V “Social and Affordable Housing” will be dealt with in a separate report which is being prepared on the submissions received that relate to the Draft Joint Housing Strategy.





Key Issue 1: Population

Summary of the main proposals set out in the Section 11 Consultation Document:

Strategic Planning Area	Census 2011	SWRPG Population Target for 2022	Proposed CDP Population Target for 2022
Total County Metropolitan	170,509	231,500	213,891
Total CASP Ring	118,418	113,500	131,882
Total North	50,498	56,343	56,012
Total West	60,377	69,243	68,837
Total Cork County	399,802	470,622	470,622

Summary of the Principal Issues Raised in Submissions:

There is broad (but not exclusive) support for the draft 'core strategy' aiming to strengthen the Cork Gateway by the growth of the Cork Metropolitan Area.

Submissions also broadly accept the need to readjust the population targets for the CASP Ring area following the 2011 Census and the proposed revised 2022 target of 131,882 is generally considered reasonable.

Concern is expressed that the proposed population target for the County Metropolitan Area (213,891) is not appropriate. This revised target proposed in the S11 Consultation Document represents a substantial decrease in the population target for this area when compared to that set out in the SWRPG 2010(231,500). The submissions opposed to this adjustment claim that it contradicts the objective to "Develop mechanisms to focus future growth on land zoned within Metropolitan Cork" and may undermine the growth of the Cork Gateway.

Also, submissions state that whilst the readjustment of the population target for the CASP Ring area is entirely necessary given the position that growth rates have already outstripped the policy target, it is requested that this readjustment should not be drawn, as proposed in the S11 Consultation Document, almost exclusively from the County Metropolitan Area. Rather, it is requested that the population target for Cork City (as set out in the SWRPG and the Draft Joint Housing Strategy should



be readjusted in terms of its timeline and the population target for the County Metropolitan Area should be restored to the original SWRPG target level of 231,500 persons by 2022.

Manager's Opinion

One of the principal aims of planning policy for the Cork region, originating in CASP/NSS and confirmed more recently in the SWRPG 2010, is to support the continued growth of the Cork 'Gateway' through the coordinated development of Metropolitan Cork including both the City Council area and the County Metropolitan Area.

CASP, the NSS and the SWRPG 2010 anticipated that future population growth in this critical location would be broadly shared between the City and County areas.

The City Council have focussed their efforts to promote population growth on proposals for the redevelopment of the docklands areas to the east of the city centre. For a several reasons, it has thus far not been possible to stimulate growth and development in the docklands at the rate envisaged in the strategic planning documents prepared during the last decade and, as a consequence, growth in the County area of Metropolitan Cork has been the main source of population growth for the Cork Gateway. During the same period, although the City and its adjoining suburbs in the County have grown, population in the City Council area has fallen.

Since the 1970's, the population of the County Metropolitan area has risen consistently and this trend appears to be largely resilient to cyclical economic variation. Average annual rates of population change in the County Metropolitan Area have been in the range of 2.04% – 2.69% consistently over the last 40 years. The population target proposed in the s11 Consultation Document represents an average annual rate of growth of 2.08% - at the lower end of the range experienced over the last 4 decades. In contrast, achieving the population target proposed in the SWRPG 2010 would require an average annual rate of growth of 2.82% - a higher rate than experienced even in the 2002-2011 period.

It is important to remember that the issue under consideration relates to proposed 'population targets' rather than a 'population forecast'. The key difference between the two concepts is that a 'target' is intended to be used for infrastructure planning purposes. To help avoid a shortage of future infrastructure, 'Target' figures are normally set at a level above the predicted or expected 'population forecast'

The need to adjust the County's population targets has arisen primarily because of the rapid acceleration in population growth experienced in the CASP Ring area during the last decade. The new 2022 population target proposed for the CASP Ring area of 131,882 is broadly accepted as a reasonable approach to the issues that the area faces. The policies proposed in the S11 Consultation Document to support the delivery of this target for the CASP Ring area include the development of measures intended to attract more growth to locations in the Metropolitan area and to provide improved control of the development of individual houses in the rural areas of the CASP Ring SPA so that these are more focussed on the needs of rural communities in that area.



The concerns raised in submissions, particularly by the CIF, argue that the consequent downward adjustment in the proposed 2022 population target for the County Metropolitan Areas (from 231,500 to 213,891) conflicts with other objectives proposed for the area and could, if the City Council's proposals for the redevelopment of the dockland areas fail to gain momentum, undermine the growth of the Cork Gateway. These are serious issues that must be addressed if the new development plans of both City and County authorities are to provide the best platform for the economic recovery of Cork and its' region.

The effect of the global economic downturn on patterns of migration makes the reliable forecasting of future population difficult. There is no clear evidence in the 2011 Census to indicate whether or not there will be a significant or lasting downturn in the future growth of the County Metropolitan Area. Historic analysis suggests that the Metropolitan area of the County may, to an extent, have some resilience to these trends. The CSO is conducting a review of National population forecasts but this is unlikely to be concluded before the new CDP comes into effect. Government has also indicated the intention to review the NSS but this also is unlikely to be completed in time to inform the new CDP.

The proposed 2022 population target of 213,891 for the County Metropolitan Area was included in the S11 Consultation Document to reflect the necessary increase in the target for the CASP Ring Area and National concerns at the effect on population growth of the slowing of in-migration and the increase in emigration since the economic downturn. It is a figure within the range of experience encountered over the last four decades.

The S11 Consultation Document also made clear that there is a sufficient supply of development land already identified in Local Area Plans capable of delivering the housing that would be required by a population of 213,891. The critical issue in securing this level of development in the coming decade concerns the delivery of essential transport and water services infrastructure rather than the identification of additional land. Raising the 2022 population target for the County Metropolitan Area as proposed in the CIF submission could bring about pressure for further zoning in Local Area Plans at a time when the focus of attention should, in the first instance at least, be on the delivery of infrastructure to service the existing zoned land supply.

Manager's Recommendation

- a. Accordingly, the view is to retain the population target for the County Metropolitan Area at 213,891, as proposed in the S11 Consultation Document.
- b. However, in order to recognise the role that the County Metropolitan Area plays in providing for the sustainable development of the Cork Gateway, and to avoid any risk that the potential of the Cork Gateway the Draft County Development Plan will include:
 - i. An acknowledgement that the SWRPG target for the area is 231,500; and
 - ii. That, in consultation with the SWRA, a review of the need to further revise the CDP target will be carried out during the lifetime of the plan taking into account:



The intended review of the NSS

The review of the SWRPG (due to be complete in 2016)

The CSO review of National population forecasts

The outcome of the 2016 Census of Population

Progress on the Development of the City Docklands



Key Issue 2: Housing Density

Summary of the main proposals set out in the Section 11 Consultation Document:

A review of density standards is proposed, particularly for high density developments, to help deliver a better range and quality of housing, particularly in the Metropolitan Towns.

It was initially suggested that the lower threshold to high density residential development should be reduced from 50+ units per ha to 40+ units per ha while retaining the current standard for medium density at 20 to 50 units per ha. This would allow for an overlap between the lower end of the high density standard and the upper end of the medium density standard giving greater flexibility and encouraging a wider choice of housing provision.

The Section 11 Consultation Document also suggested that development proposals on land zoned for medium density should not normally be required to include apartments. Retaining the upper limit for medium density at 50 units would still allow apartments, but only where market conditions suggest they would be a viable development proposition.

Other suggestions included:

- Provide clearer guidance on the meaning and use of the terms 'net density' and 'gross density'.
- Encourage a wider range and quality of housing on lands zoned for medium density development.
- Develop a set of reduced density standards based on the Guidelines for Smaller Towns i.e. under 5000 population.
- Encourage wider provision of detached and/or serviced sites in the main settlements.

Summary of the Principal Issues Raised in Submissions:

Density standards should not stifle development in desired locations

The planning authority should take cognisance of what the housing market is demanding in order to best encourage development into the most appropriate locations.

Analysis of the demand for individual rural houses in Cork indicates an increasing expectation for larger units and more space within the property which is difficult to achieve within the current density framework.

The widespread imposition of higher densities (which usually results in smaller dwellings and garden sizes) encourages the dispersal of population to locations where such restrictions do not apply

Current density standards do not provide sufficient market flexibility, particularly to assist the housing sector in recovery from the downturn.



The upper level of the current medium density category (50 dwellings/ha) is too high.

The proposal to provide an overlap between high and medium density categories is supported.

A similar overlap should be created between the current medium and low categories.

Government Policy – Cities & Larger Towns

Ministerial Guidelines issued under S28 of the Act in May 2009 – ‘Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)’ indicate that, within cities and larger towns (towns with 5,000 or more people), the following are appropriate locations for higher densities:

- City & Town Centres
- ‘Brownfield’ sites (within city & town centres)
- Public transport corridors
- Inner suburban/infill
- Institutional lands
- Outer suburban/‘Greenfield’ sites

Within County Cork, the following 12 locations have a population of 5,000 or more people and fall to be considered under this aspect of the guidelines:

- Cork North Environs
- Cork South Environs
- Ballincollig
- Bandon
- Carrigaline
- Cobh
- Fermoy
- Glanmire
- Mallow
- Middleton
- Passage West
- Youghal

In addition, the following 6 settlements, although their current population is less than 5,000, are planned to grow to a population in excess of that figure. Therefore although not formally falling under the remit of this section of the Guidelines, it is considered that some consideration needs to be given to their application in these locations. These locations are:

- Blarney
- Bantry
- Carrigtwohill
- Kinsale



- Mitchelstown
- Monard

From the submissions received in response to the S11 Consultation Document, there is no indication of concerns at the application of the Guidelines to town centres, 'Brownfield' sites within town centres, inner suburban /infill, or institutional lands. The main concerns raised in submissions relate to the application of the Guidelines to public transport corridors and outer suburban/Greenfield land and the approach to each of these recommended in the Guidelines is set out in the following paragraphs.

Public Transport Corridors. The main considerations identified in the guidelines are:

- The State seeks to maximise the return on its investment in public transport services by encouraging sustainable development, including higher densities in these corridors.
- The phasing of major residential development in tandem with new public transport infrastructure should be considered.
- Walking distances from stations, halts and bus stops should be used to define these corridors. Increased densities should be promoted as follows:

Bus stop	400/500m
Light Rail/Rail Station	1,000m

- Public transport capacity (e.g. the peak hour service frequency) should be taken into account.
- In general, minimum net densities of 50 dwellings/ha should be applied within these corridors with the highest densities being applied at rail stations/bus stops and decreasing with distance away from these points.
- Minimum densities should be specified in local area plans and maximum, rather than minimum, parking standards should reflect proximity to public transport facilities.

Outer Suburban/'Greenfield' sites. The main considerations identified in the guidelines are:

- This category includes open lands on the periphery of cities and larger towns requiring the development of new infrastructure and social facilities etc.
- The greatest efficiency in land use within this category will be achieved by providing net residential densities in the range of 35-50 dwellings/ha (involving a variety of house types where possible) and such densities should be encouraged.
- Development at net densities less than 30 dwellings should generally be discouraged.

Provision for Lower Densities in Limited Cases. To facilitate a choice of housing types within areas, limited provision may be made for lower density schemes, provided that within a neighbourhood or district as a whole, average densities achieve any minimum standards recommended above.



Government Policy – Small Towns & Larger Villages

The government intends these policies to apply to towns and villages of less than 5,000 but more than 400 persons and the main issues are:

- Development should be plan led.
- New development should contribute to compact towns and villages.
- Higher densities are appropriate in certain locations including:
 1. Locations close to gateways and Hubs designated under the NSS that are served by planned or existing high quality public transport corridors.
 2. Locations where higher densities contribute to the enhancement of the town or village.
- Lower densities can be acceptable where they offer an alternative to urban generated housing.
- The scale of new development should be in proportion to the pattern and grain of existing development.

Manager's Opinion

The general thrust of Government Policy in recent years has been towards the application of higher densities in order to encourage more efficient land use and infrastructure investment patterns and particularly to create conditions more favourable to the increased use of public transport.

In County Cork there has been some important public investment in transport infrastructure allied to this objective especially the delivery of the Cork Suburban Rail Network, which currently links Cork with the Metropolitan Towns of Cobh, Carrigtwohill and Midleton, and, in future, is intended to serve Blarney and Monard. Also, there have been significant improvements to the bus service in Douglas and other parts of the Cork South Environs. Preliminary proposals for a rapid-bus network linking Ballincollig with the City Centre and Mahon have also been developed although there is no current commitment to the implementation of these.

Also, in recent years, there has also been rapid growth in the number of individual rural houses constructed, especially in the CASP Ring area where car-based commuting to Cork for employment, education and shopping is attractive to many. There is some evidence to suggest that many of these newly constructed rural houses are larger in floor area than a typical modern house in a more urban setting.

While the current County Development Plan has generally sought to achieve the higher densities where practical, concerns have arisen that the general application of higher density policies to the supply of zoned development land could be restricting the range of house types available and



encouraging a significant number of households to locate in rural areas outside Metropolitan Cork in order to secure their desired dwelling format.

A number of submissions received have also claimed that the approach to density in the current CDP, which may well have been appropriate in the housing market conditions prevalent prior to the economic downturn, are no longer appropriate to current market conditions in Cork and, without greater flexibility, could hamper the recovery of housing construction.

The challenge for the new County Development Plan, therefore is to develop policies for housing density that can respect the Government's wish to deliver a sound return on infrastructure investment, particularly in relation to public transport, provide flexibility for developers to adapt to new market conditions and broaden the range of house types that can be built on zoned land so that, in future, more households will be attracted to locate in the County's towns, especially in the County Metropolitan Area.

The Ministerial Guidelines issued under s 28 of the Act indicate that higher densities are potentially applicable in three categories of location found within County Cork:

- i. Town Centres
- ii. Public Transport Corridors
- iii. Outer Suburban/'Greenfield' Sites

So far as **Town Centres** are concerned, none of the submissions received have suggested that higher densities are not generally appropriate. Indeed the Government's advice is that there should be no upper limit on the number of dwellings that may be provided on town centre sites, subject to certain safeguards.

With regard to **Public Transport Corridors**, the criteria set out in the Ministerial Guidelines issued under S28 of the Act suggest that a number of locations within the Metropolitan area of County Cork have the potential to accommodate higher densities on the basis of their proximity to public transport services. The main location where higher densities could be considered on public transport grounds are those parts of the Cork South Environs where bus services achieve a 15 min frequency in peak hours (e.g. Douglas Village and some adjoining areas). However, it is considered that, in many other locations, the frequency of services, particularly during peak hours, is currently below the level appropriate to the general application of higher densities.

Although there has been significant public investment in rail infrastructure in the corridor between Cork and Midelton/Cobh (including Carrigtwohill) the current peak hour service frequency on many parts of this route is only 30mins, with an hourly service outside peak hours. Also, all the public transport serving these locations is inter-urban in its nature and none of these locations currently benefit from any significant public transport services within their own urban area.

It is considered, therefore, that at present and in the absence of proposals to enhance the frequency of service, these locations do not currently meet the requirements identified in the Guidelines as Public Transport Corridor locations generally suitable for higher densities. In addition, the need to encourage a greater mix of house types on zoned land in the County Metropolitan Area in order to help moderate the future rate of population growth in the rural parts of the CASP Ring area suggests



that it could be more appropriate to provide more flexibility in the density of future development to facilitate some lower density development in these locations.

The **Outer Suburban/'Greenfield' Sites** category includes relatively large scale development proposals on the edge of large towns (where the County Council's practice has been to prepare masterplans or other site-specific plans to address detailed site planning and density issues) and where significant new infrastructure is required and the main locations with the potential to fall within this category are:

- Ballincollig
- Blarney (Stoneview)
- Carrigaline (Shannon Park)
- Carrigtwohill (Land North of the Railway)
- Cobh
- Glanmire (Dunkettle)
- Mallow
- Midleton (Waterrock)

The Ministerial Guidelines suggest that average net densities in the general range of 35-50 dwellings/hectare should be encouraged and net densities of less than 30 dwellings/hectare should be discouraged and that these densities can be achieved whilst also achieving the construction of a variety of house types.

A number of submissions received in response to the S11 Consultation Document have suggested that unless these locations can secure the construction of a wide range of dwelling types, then the tendency for those seeking larger/lower density dwellings will be to resort to more rural locations where the provision of essential services is more difficult and costly and the opportunities to use public transport are more limited.

Therefore, while the aim to achieve more efficient land utilization through higher densities is recognized, the need to broaden the range of house types needs to be given equal weight in the detailed planning of these areas.

In order to address these issues the following broad approach is suggested:

Higher density development is generally considered to involve the construction of duplex dwellings or apartments. The current CDP definition of high density commences at 50 dwellings/ha with no upper limit. Medium density development is defined in the current CDP as development in the range of 20 - 50 dwellings/ha.

In practice, apartment or duplex development is usually necessary to achieve net densities in excess 35 dwellings/ha which means that apartment or duplex development is often being sought or required on land zoned for medium density development.



Therefore, to remove this anomaly the first recommendation below is to extend the definition of high density down to 35 dwellings/ha.

No changes are proposed to the definition of medium density development but it is proposed to rename the category Medium Density 'A'. The new category will include a statement indicating that whilst apartment development is permissible on land zoned for medium density development there will be no REQUIREMENT for this form as part of the mix of units on a particular site. Under these proposals, there will be an overlap in the definitions between the upper end of the medium density scale and the lower end of the high density scale. A further proposal to encourage a broader mix of dwelling types is to consider a reduction in the public open space requirement where larger private gardens are provided.

With regard to low density development, it is proposed to merge this existing category with the existing Medium Density category create a new category to be referred to as Medium Density 'B' to encourage a broader range of house types. This category would replace the current 'Low Density' category and could be applied to some sites currently zoned for medium density where there was a requirement to broaden the range of house-types *constructed*. The upper limit for this category is proposed at 25 dwellings/ha (35 in smaller towns outside Metropolitan Cork) allowing a wide range of densities to be constructed and creating an overlap between the upper limit of this category and the lower limit to the Medium Density 'A' category. There is no lower limit suggested for this category but proposals for densities of less than 12 dwellings/ha will need to be supported by a justification of the market demand for the finished units. A further proposal to encourage a broader mix of dwelling types is to consider a reduction in the public open space requirement where larger private gardens are provided.

All development on zoned land should normally connect to public water and waste water services.

Although these proposals are likely to result in some amendments to the current LAP's in order to effect a re-distribution of zoned land, particularly between the 'Medium A' and 'Medium B' density categories, at this stage, it is not envisaged that these proposals will necessitate any increase in the overall supply of zoned land.



Manager’s Recommendation

In order to provide greater flexibility within density categories (to assist in the recovery of the house construction sector and encourage the construction of a wider range of house types), the Draft CDP should include the following proposals for housing density on zoned land:

Table 2.2 Proposals for Housing Density on Zoned land

	Min Net Density	Max net Density	Comment
High	35	No limit	<ul style="list-style-type: none"> • Applicable in town centres throughout the County and in other areas identified in LAP’s normally in close proximity to existing or proposed high quality public transport corridors. • Normally requires/involves apartment development. • Subject to compliance with appropriate design/amenity standards.
Medium ‘A’	20	50	<ul style="list-style-type: none"> • Retained at the current range of 20 dwellings/ha up to a maximum of 50. • Applicable in city suburbs, larger towns (over 5,000 population and rail corridor locations (e.g. Carrigtwohill). • Apartment development is permissible where appropriate but there is no requirement to include an apartment element in development proposals. • Consider a lower standard of public open space provision where larger private gardens are provided. • Must connect to public water and waste-water services. • Some land currently designated ‘medium density’ in LAPs especially in towns outside Metropolitan Cork (but also including appropriate locations within Metropolitan Cork) would be reclassified as ‘Medium B’ to promote the construction of a wider range house types to help off-set the recent high level of demand for rural housing particularly in parts of the CASP area . • Broad housing mix normally required including detached/serviced sites unless otherwise specified in relevant Local Area Plan.
Medium ‘B’	12	25	<ul style="list-style-type: none"> • Extended to 25 dwellings/ha (35 dwellings/ha in smaller towns outside Metropolitan Cork) from the present upper limit of 20 to encourage higher overall densities and a broader mix of house types in this category to help off-set the recent high level of demand for rural housing particularly in parts of the CASP area. • Normally applicable in smaller towns (less than 5,000



	Min Net Density	Max net Density	Comment
			population) <ul style="list-style-type: none"> • Can be applied in larger towns through LAP's where there is a requirement to broaden the range of house types. • Densities less than 12/ha will be considered where an exceptional market requirement has been identified. • Densities from 25 up to 35/ha will be considered where an exceptional market requirement has been identified. • Consider a lower standard of public open space provision where larger private gardens are provided. • Must connect to public water and waste-water services • Broad housing mix normally required including detached/serviced sites unless otherwise specified in relevant Local Area Plan.

That the following table be included in the Draft CDP to guide the densities applied to zoned land in LAP's:

Table 2.3: Guide to how the Proposed Housing Density Standards apply to Zoned Land.

	All Towns	High	Applicable in town centre locations
Towns with Public Transport Corridor Potential	Ballincollig Blarney Carrigtwohill Cobh Midleton	High	Applicable in locations close to future high quality public transport proposals
		Medium A	Generally applicable for future development
		Medium B	Applicable in a limited number of peripheral locations identified in LAP's
Other Large Towns	Carrigaline Mallow Passage West Cork North Environs Cork South Environs Bandon Fermoy Glanmire Mallow Passage West Youghal	Medium A	Generally applicable for future development
		Medium B	Applicable in a limited number of peripheral locations identified in LAP's
Smaller Towns	All Other Towns	Medium B	Generally applicable for future development





Key Issue 3: Rural Housing

Summary of the main proposals set out in the Section 11 Consultation Document:

Census 2011 results suggests that revised rural housing policies are required in order to (i) help deliver a pattern of future population growth more in line with the SWRPG; and (ii) make provision for categories of rural housing need identified in Ministerial Guidelines to Planning Authorities but not identified in the current County Development Plan.

The analysis in the S11 Consultation Document follows the approach set out in the Ministerial Guidelines for Sustainable Rural Housing (2005) which recommends that planning authorities adopt a 'plan led approach in identifying the different types' and then 'develop an appropriate policy framework for each of the area types identified'.

The Section 11 Consultation Document identifies the different types of rural areas in County Cork based on a detailed set of criteria, which include analysis of rural housing growth, census results, environmental sensitivity and peak hour drive times from Cork City.

The different types of Rural Areas in County Cork identified are:

- Metropolitan Greenbelt – Area under Strong Urban Influence,
- Outer Area under Strong Urban Influence and Town Greenbelts,
- Tourism and Rural Diversification Area,
- Stronger Rural Area,
- Transitional Rural Area,
- Structurally Weaker Rural Area.

The consultation document suggests how the broad categories of rural generated housing need, which are based on the 2005 Ministerial Guidelines on Sustainable Rural Housing, could be applied to the six different rural area types identified in County Cork.

Under this approach applications for individual dwellings in Rural Areas would need to meet one of the rural housing need criteria within an individual rural area type, in order to be considered.

Summary of the Principal Issues Raised in Submissions:

Generally, there was little, if any, criticism in the submissions of the proposed approach to rural housing in the CASP area, including the current Cork Metropolitan Green Belt. Submissions requested that the construction of individual houses in rural areas should be restricted to address the suburbanisation of the countryside, the significant growth in the CASP ring rural area needs appropriate policy responses in terms of services required, provisions for long-established institutional uses and strategic and exceptional uses within the Metropolitan Greenbelt should be



retained and that 'Persons with a strong social connection to an area' should be included for consideration within the 'Metropolitan Greenbelt – Area under Strong Urban Influence'.

Regarding the high construction rates and high vacancy rates in the West Strategic Planning Area submissions stated that these should not be construed as over-provision of housing in these rural areas', that the Planning Department should be able to distinguish between second houses and the needs of the indigenous dwellers in rural communities and that demand for holiday homes in the West Strategic Planning Area and sensitive coastal areas should be balanced with environmental and tourism considerations.

There were a number of submissions made relating to the West Cork Islands which raised the following issues relating to rural housing on the Islands:

- Provision of permanent housing in a sustainable manner.
- Islands should be considered as a distinct rural area.
- High number of second homes and resultant impacts.
- Need to distinguish between second homes and managed holiday homes.
- Renovation of ruinous or derelict / disused dwellings should be encouraged for the provision of short stay / permanent accommodation as opposed to new buildings.
- New buildings should be vernacular, of an appropriate scale and sensitive, located close to existing clusters and promote design principles of the 'Cork Rural Design Guide'.
- Need to strike a balance between demands for holiday home development and channel this demand to appropriate locations.

Government Policy – Sustainable Rural Housing Guidelines

The Sustainable Rural Housing Guidelines are the current statement of government policy on rural housing. They were introduced in 2005 after the last major review of our own rural housing policies.

The salient points in relation to the review of Rural Housing policies in the Guidelines are as follows:

- The Guidelines highlight the importance of the planning system adopting a more 'analytically based and plan led approach'.
- The Guidelines state that it is 'vitally important that a process of research and analysis be carried out into population and development trends in rural areas', which should include the identification of 'Rural Area Types' set out in the NSS.
- The development plan should illustrate these areas on a single general map, avoiding an overly-detailed and prescriptive map.
- The Guidelines state that the results of the analysis should be published (e.g. included in any 'Issues paper') to harness public support for the plans objectives.
- Having defined the 'Rural Area Types', the planning authority must then tailor policies that respond to:
 - The different housing requirements of urban and rural communities.
 - The varying characteristics of rural areas.



Planning policies will need to avoid ribbon (example and definition cited in the guidelines) and haphazard development in rural areas close to towns / cities.

These policies should be addressed within the context of an 'overall settlement strategy', which would set out a vision for urban and rural areas.

Manager's Opinion

The principles established for Rural Housing in the Draft Core Strategy are based on the approach outlined in the 2005 Ministerial Guidelines on Sustainable Rural Housing which identifies the need for the planning authority to undertake a process of research and analysis to identify the rural area types in the County and develop an appropriate policy response for each rural area type. The S11 Consultation Document suggests how the broad categories of 'rural generated housing need' could be applied to the different rural area types.

No submissions were received raising any objection to the approach in the S11 Consultation Document of identifying different rural area types and suggesting how the categories of rural generated housing need could be applied to the whole of the County.

A number of submissions received have raised issues relating to the impacts of high numbers of second homes and holiday homes in West Cork. The research undertaken to inform the S11 Consultation document, identified above average rural housing growth in large parts of the West Cork SPA, which coupled with an analysis of census results which indicate lower levels of population growth and higher levels of housing vacancy in this area, suggests that demand for second homes is a significant factor affecting the overall demand for rural housing. Within rural areas, the suggested policy approach outlined in the S11 Consultation Document prioritises those persons with rural generated housing needs. The Draft Development Plan will formulate specific policy measures to address demand for holiday and second home development which should be accommodated within the settlement network.

The S11 Consultation document identified the need to develop policies to better manage rural housing pressures in the CASP Ring SPA. The Draft Core Strategy set out in the S11 Consultation Document identifies the CASP area as 'An Area Under Strong Urban Influence' and suggests restrictions on the categories of persons eligible for consideration within the rural housing need criteria. No submissions were received which raised any objections to this approach. This approach as set out in the S11 Consultation Document is an important part of a series of measures which are necessary to realign future growth with the population targets set out in SWRPG and CASP.

In general, there were no submissions which raised objections to the suggested approach in the S11 Consultation Document of how the broad categories of rural generated housing need could be applied to the six different rural area types, with the exception of one submission which raised the issue of including "Persons with a strong social connection to an area' for consideration within the 'Metropolitan Greenbelt – Area under Strong Urban Influence'. The Ministerial Guidelines state that each planning authority should make an assessment of rural housing needs to be considered taking into account local conditions and planning issues, in particular whether they are dealing with rural



areas on the edge of large cities or adjoining more medium-sized towns. The approach in the S11 consultation document is based on this guidance, in how it defines the rural housing needs to be considered in the rural area under most development pressure on the edge of the Cork City Gateway. The inclusion of additional categories of rural generated housing needs for consideration within the Metropolitan Greenbelt would represent a relaxation of rural housing policies that currently exist in the A1 Metropolitan Greenbelt.

The issue of retaining specific objectives for 'long established institutional uses' and 'strategic and exceptional uses' within Metropolitan Greenbelt lands was raised in a submission. It is not intended that the Draft County Development Plan will remove reference to these 'uses' within Metropolitan Greenbelt lands.

There were several submissions received from a number of the West Cork Islands and it is the intention to consider specific policy measures in the Draft County Development Plan, which will support the sustainable growth of the Islands over the plan period.

3. Manager's Recommendation

- a. It is considered that the approach to Rural Housing as set out in the Draft Core Strategy of the S11 Consultation Document complies with the provisions of the Ministerial Guidelines on Sustainable Rural Housing issued in 2005.
- b. It is recommended that the Draft CDP should proceed with:
 - i. The inclusion of a map showing the rural housing policy areas as set out in the S11 Consultation Document.
 - ii. The formulation of rural housing policies to be applied in the six rural area types to be based on the broad categories of rural generated housing need outlined in the S11 Consultation Document.



Key Issue 4: Economy and Employment

Summary of the main proposals set out in Section 11 Consultation Document:

The 2011 Local Area Plans identified a total of 1108.98ha zoned for Business and Employment within the 29 main settlements, a further 1051ha is zoned within the development boundaries of strategic employment areas at Carrigtwohill, Ringaskiddy, Kilbarry, Little Island and Whitegate. In addition, currently redundant industrial land at Marino Point has also been included.

The Section 11 document includes a set of definitions for each zoning category. Table below summaries the land availability by zoning category.

Table 2.4 Total amount of zoned land by Strategic Planning Area

Strategic Planning Area	Population (2011)	Population 2022	Special Uses	Business	Industry	Enterprise	Total (Ha)
1. Metropolitan	170,509	213,891	589.2	113.4	686.65	57.1	1,446
CASP Ring	118,418	131,822		139.1	45.5	33.5	218.1
3. North SPA	50,498	56,012	2.46	213.42	31.7		247.58
4. West SPA	60,377	68,837		134.2	72.1	11.5	217.8
TOTAL	399,802	470,622	591.66	600.12	835.95	102.1	2,130*

**An additional land area of approximately 121 ha has been zoned in the Town Council Areas*

The current County Development Plan includes a hierarchy of employment locations including the following categories.

- Major Employment Centres (including large-scale strategic and specialised manufacturing areas)
- District Employment Areas (the main towns)
- Local Employment Centres (small towns and key villages)
- Rural Employment Areas (the rural areas)

The purpose of the hierarchy is to provide a basis for developing an appropriate policy framework for each type of area and for prioritising the provision of services to facilitate future development.

To better reflect the different economic climate and issues that the County now faces, it is suggested that this aspect of the County Development Plan should be revised along the following lines:



Table 2.5: Suggested Employment Hierarchy

Principal Locations	Overall Strategy
City Environs & Cork Airport, Ballincollig, Blarney, Carrigaline, Carrigtwohill, Cobh (inc Marino Point, Little Island, Midleton, Monard, Ringaskiddy, Whitegate and Mallow.	<p>Strategic Employment Areas suitable for larger scale development at Carrigtwohill, Little Island, Ringaskiddy and Whitegate.</p> <p>Specialised roles for Cork Airport & Marino Point.</p> <p>Acknowledge the importance of Whitegate as a national energy hub.</p> <p>Seek funding and prioritise to ensure the advance provision of infrastructure.</p> <p>Identify a choice of sites for large, medium & small enterprise/business/industry.</p>
Bandon, Bantry, Castletownbere, Clonakilty*, Fermoy, Kinsale, Macroom, Mitchelstown, Skibbereen, Youghal and Key Villages	<p>Focus on local catchment employment.</p> <p>Infrastructure programme to service identified supply of land for future employment development focused on medium to small business/ industry.</p>
Rural Areas	<p>Support agriculture, fishing & food processing sectors.</p> <p>Encourage rural diversification (especially tourism but also on off farm employment activities such as processing of agricultural produce.</p>
*Clonakilty: Enhanced employment function with a regional focus.	

Summary of the Principal Issues Raised in Submissions.

There is general acceptance of the proposed employment hierarchy and of the overall strategy suggested for the various principal locations.

Some submissions sought inclusion in the hierarchy or greater promotion and support for places such as Cork Airport, the proposed Cork Science and Innovation Park the former Mallow Sugar Factory, Whitegate/Aghada, etc.

A submission from Irish Concrete Federation suggests the development of a policy statement or strategy recognizing the important contribution the aggregates industry makes to the economy of the county and to apply protection to important aggregate reserves.



Indaver Ireland requests changes to the Industry zoning definition which currently allows for waste activities, but excludes landfill and contract incineration. The submission states that in light of the EU Waste Framework Directive (2009/98/EC) and (S.I. No. 126 of 2011) incineration activities that meets a minimum efficiency criteria, is in fact a recovery operation and must be treated as such. The difference between recovery operations and disposal must be respected. Currently the County Development Plan does not reflect this distinction.

Managers Opinion

There is general acceptance of the proposed employment hierarchy subject to a number of additional locations being included namely Cork Science and Innovation Park and Kilbarry.

There has been no request for additional land to be zoned for employment purposes and the proposals to prioritise the provision of infrastructure set out in the suggested hierarchy are broadly accepted.

There have been no requests for changes in the zoning definitions relating to the various categories of employment development.

The principal exception to this, concerns the exclusion of 'contract incineration' from the range of waste management activities that are considered appropriate on land zoned for industrial development. The Waste Framework Directive (2009) issued by the EU since the preparation of the current County Development Plan, establishes a hierarchy setting out the priorities for Waste Management Policy. The hierarchy is as follows:

1. Prevention;
2. Preparing for re-use;
3. Recycling;
4. Other recovery, e.g. energy recovery; and
5. Disposal.

The submission requests that energy recovery plants should be the subject of a separate policy framework to 'disposal' (e.g. landfill) activities) in the County Development Plan.

Whilst the waste hierarchy set out in the Waste Framework Directive is recognised, the role of the County Development Plan is to establish the appropriate planning framework to guide the consideration of proposals for all the elements within the hierarchy. Generally, land zoned for industrial development is suitable for many waste management activities. However, large-scale activities for recycling, other recovery or disposal (including facilities such as Materials Recovery Facilities (MRF's), Waste to Energy plants and Landfill facilities) often need more careful planning because of their importance to the regional waste infrastructure and because of their potential for adverse impacts in the immediate vicinity of the proposal and beyond.

Therefore the location and other criteria for these large-scale elements of waste management infrastructure should normally be established in Waste Management Plans which the Government is proposing to establish at Regional level. It is proposed that the draft County Development Plan



should recognise the importance of energy recovery as part of the waste management hierarchy but indicate that, because of their regional significance, the location and other aspects of proposals for large-scale waste management infrastructure should be guided by the relevant Waste-Management Plan.

With regard to the reserves of aggregates and other minerals within the County, some submissions suggest that the County Development Plan should identify important or significant reserves and set out a policy framework to protect their future potential for extraction, particularly from inappropriate development. Given the extent and diversity of mineral reserves in the County, such a strategy would be difficult to complete prior to the publication of the draft plan. However, the suggestion will be considered, subject to the availability of resources, once the Development Plan is completed.

3. Managers Recommendation

- a. Include the Cork Science and Innovation Park, and Kilbarry as Principle Locations in the Employment Hierarchy setting out overall strategy for each location.
- b. Provide a revised definition of industrial development acknowledging the importance of energy recovery in the waste hierarchy. Indicate that land zoned for industry is normally suitable for a wide range of small to medium sized waste management activities. The location of large scale waste management activities can be accommodated on land zoned for industry and will generally be guided by the appropriate waste management plan.
- c. Consider preparation of a Minerals Strategy to protect existing unworked deposits and to support a sustainable aggregates and extractive industry. This may take at least two years to prepare.



Key Issue 5: Tourism

Summary of the Principal Issues raised in Submission.

Fáilte Ireland welcomes the consultation document and states that the principles, vision and key aims outlined for County Cork would appear to be consistent with and sympathetic to their aims to support the tourism industry and sustain high-quality and competitive tourism destinations.

The submission requests that the Draft Development Plan will contain a 'robust policy framework that supports the sustainable development of the tourist industry within County Cork and the wider region.'

There are a number of strategic initiatives that Fáilte Ireland has partnered with Cork County Council, with a view to growing tourism in a sustainable manner and which should be mentioned in the new plan. In particular, these are the Wild Atlantic Way, the Cork City and Harbour Interpretative Project and the Spike Island Master Plan.

A redirection of growth pressure from the CASP SPA to the Metropolitan SPA and Cork Gateway is advised.

Fáilte Ireland is keen to review the draft plan's policy framework in relation to;

- Tourism development;
- Protection of Scenic Landscapes;
- Preservation and enhancement of environmental quality and distinctiveness (including facilitating access to and sustainable enjoyment and usage of the county's environmental assets) (i.e. uplands, coastal areas and heritage resources).

Manager's Opinion

The development of a robust policy framework that supports the sustainable development of the tourism industry within County Cork is an important aspect of the preparation of the new County Development Plan and the submission from Fáilte Ireland emphasises the issue.

The current plan includes references to the principal areas of the County with strategic tourism potential and there are generalised objectives providing broad support to tourism sectors such as marine, golf, walking and cycling. There is also some guidance to those proposing tourist accommodation development.

The Global tourism market has become increasingly competitive in recent years and the economic downturn has brought significant challenges for the County's tourism sector. Fáilte Ireland suggest that the strategy in the current County development Plan could be developed further to enhance the alignment between local and national strategies, to the overall advantage of this important economic sector.



The current County Development Plan refers to broad areas of the County with strategic tourism potential. This approach could be expanded in the new plan by identifying a short list of the major current and potential visitor destinations in the County so that the new plan can provide a planning framework to protect the quality and capacity of the tourism attraction that they offer and provide a framework for the sustainable development of these assets in the future.

Fáilte Ireland also place significant emphasis on the importance to the tourism industry of protecting and enhancing the environmental quality of the County (referring to its' 'uplands, coastal and heritage resources') which is itself a distinctive attractive asset for the tourism sector. The proposals in the S11 Consultation Document to direct growth pressure away from parts of the CASP Ring area towards locations in the County Metropolitan SPA are supported on tourism grounds. The County Council are requested to encourage holiday and second home development proposals to focus on locations within the towns and villages of the County and rural housing policies suggested in the S11 Consultation Document will go some way towards the achievement of this aim.

Fáilte Ireland also ask the County Council, in order to assist the County's tourism industry, to take steps to protect the important landscapes of the County and to generally preserve and enhance its' environmental quality. Proposals set out in the S11 Consultation Document and elsewhere in this report go some way to achieving this aim. Subject to certain exceptions, it is proposed to exclude large-scale wind energy development from the most valuable landscape areas of the County. This approach, intended to protect these important tourism assets, could be extended by including objectives in the new plan to limit or restrict the potential in these areas for other large structures with significant landscape impacts.

Manager's Recommendation

- a) Provide a list of the top current and potential tourist destinations and attractions in the county and put in place appropriate policies to protect their future development potential.
- b) Recognize the importance of Spike Island as a key tourism asset.
- c) Continue to support joint tourism initiatives such as the Wild Atlantic Way and Cork City and Harbour initiatives.
- d) Provide guidance in the draft plan with regard to protecting important landscapes.
- e) The draft plan will include policies and objectives to protect our important landscapes, preserve and enhance the County's environmental quality and distinctiveness including facilitating access to and enjoyment of the county's environmental assets (uplands, coastal areas and heritage resources)
- f) Include policies and objectives to support the county's Green Infrastructure (particularly the development of Greenways, walkways, cycleways and waterways).



Key Issue 6: Retail (including Town Centres)

Summary of the main proposals set out in the Section 11 Consultation Document:

New retail development, wherever possible, will support the role of town centres as the principle location for shopping activities and ensure the continuing vitality and viability of town centres is maintained and enhanced.

The new County Development Plan will set out proposals for retail activities appropriate to meet the needs of the population targets for 2022 and identify the main retail centres (Suggested Retail Network) in the county outside Metropolitan Cork and suggested general policy approach. (See Table 2.6 below from Section 11 document)

Priority will be given to adapting existing property in town centre areas for retail and other town centre activities and, in towns with vacancy issues, proposals for new retail development outside of the town centre would need to be supported by an assessment of vacant floorspace within the town centre.

A general presumption against any further development of retail parks. Mallow and Clonakilty as higher order centres may be exceptions provided adverse effects on the town centre can be avoided. Apply a cautious approach in relation to retail warehousing proposals particularly in towns where there is evidence of higher vacancy levels.

Table 2.6 Suggested Retail Network (Section 11 Consultation)		
	Towns	Suggested Policy Approach
Main Settlement centres which have a Regional Role within the North and West of the County.	Mallow, Clonakilty.	Convenience at level to support own catchment. Comparison should have no upper limit provided location is acceptable. Planned retail parks appropriate where justification is evident.
Ring Towns and the larger settlement centres within the North and West SPA's.	Youghal, Bandon, Macroom, Mitchelstown, Charleville, Fermoy, Skibbereen, Bantry, Kanturk, Kinsale.	Convenience and Comparison to be provided which is in line with its catchment. Cautious approach to out-of-centre retail warehousing.
Smaller population centres within the North and West SPA's which generally function at electoral area level.	Millstreet, Castletownbere, Dunmanway, Newmarket, Schull, Buttevant.	Primarily convenience with some comparison as appropriate. Cautious approach to out-of-centre retail warehousing.



Summary of the Principal Issues Raised in Submissions:

The merits/demerits of town centre locations for modern retail developments and implications of development outside of town centres were raised in a number of submissions. Some submissions requested that new retail development needs to be carefully considered and planned advocating the prevention of further multiplication of large retail centres in particular where there is already evidence of saturation and where new shopping centres results in the displacement or net loss of jobs. There was a strong emphasis in a number of the submissions that out of town retail developments have an adverse effect on the retail core of a town. Others suggested that edge of centre or out of centre locations should be facilitated and needs to be supported by appropriate zoning of lands and appropriate policy.

Submissions claimed that additional investment in town centres required (renewal and regeneration) including town centre management. Town centres are losing business due to high parking charges, fines, etc. Specific issues in individual towns need to be addressed e.g. flooding. Clarity was sought regarding retail core and status of town centre expansion areas. Identifying target town centre expansion areas is necessary.

There was general support for the proposed retail hierarchy with the city as the primary retail centre but submissions requested that the plan should identify deficiencies particularly in relation to individual towns. Lack of guidance in certain towns is undermining expansion plans. A number of submissions requested that policy and objectives in the plan in relation to retail and town centres be positive, flexible and innovative to deal with emerging retail trends and different forms of retail. 'Choice' of retail is a key issue in a town attracting trade and plan must recognise how consumers shop.

Recognition of investment - Protection of existing investment and extant permissions needs to be recognised in policy.

Submissions sought recognition for the positive contribution of discount foodstores to the vitality and viability of smaller population centres and it should be recognised that the limited size of discount foodstores does not challenge high street functions of core shopping areas and requested that retail is 'open for consideration' under all use zoning classes.

Government Policy – Retail Planning

Ministerial Guidelines issued under S28 of the Act in April 2012 – 'Retail Planning Guidelines for Planning Authorities' outline 5 key policy objectives which must guide planning authorities in addressing their development planning and management functions, namely:

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



Manager's Opinion

The general thrust of Government Policy (Retail Guidelines 2012) is to ensure that the vitality and viability of town centres is promoted and supported with the sequential approach to retail development as a key component of this. The guidelines also require that retail development must follow the settlement hierarchy of the State and retail development should be appropriate to the scale and function of the settlement or part of the settlement in which it is located as designated by the NSS, relevant regional planning guidelines and development plan core strategies.

The guidelines require Development Plans and their supporting analysis to adopt a vigorous approach to investigate, activate and assist in resolution of impediments to development opportunities in city and town centres. It is envisaged that the Draft Plan will provide further guidance in this area and broad based guidance appropriate for the principal settlements in line with their status within the settlement hierarchy.

An indication of the suggested retail hierarchy for the County excluding Metropolitan Cork was included in the Section 11 document. The Draft Metropolitan Cork Joint Retail Strategy sets out proposals for retail hierarchy for the County Metropolitan Area and it will be for the draft County development plan to set out a combined hierarchy for the County. An initial Draft of this is set out at the end of this section of this report.

The promotion of town centre vitality is one of the 5 key policy objectives of the Retail Planning Guidelines and the Section 11 document has also recognised that policies in the next plan need to ensure new retail development, wherever possible supports the role of town centres as the principle location for shopping activity. It is also the intention of the Draft Plan to include policy and objectives which encourage regeneration, environmental (public realm), transport and accessibility improvements in town centres generally in order to make them more appropriate for today's needs. In particular the objectives are likely to encourage the concept of a greater holistic management of town centres.

The distinction between 'discount stores' and other convenience goods stores which was contained in the 2005 Retail Planning Guidelines no longer applies in the 2012 Guidelines. The guidelines state however that the balance between the convenience and comparison element is a critical element in the assessment of the suitability of the development proposal and guidance on this will be included in the draft plan.

The Section 11 document proposed that in towns with vacancy issues proposals for new retail development outside of the town centre would need to be supported by an assessment of vacant floorspace within the town centre. This is only one of a number of criteria which will need to be taken into consideration in relation to determining whether a proposal is likely to have an impact on the vitality and viability of the town centre.



Manager's Recommendation

1. The view is to retain the retail network for the County as proposed in the Section 11 Consultation Document and aligned with the retail hierarchy from the Draft Metropolitan Cork Joint Retail Strategy once finalised. (See Table 2.7)
2. The objectives to be included in the Draft Plan will, as stated in the Section 11 document, be very much aligned with the key policy objectives set out in the Retail Planning Guidelines and will seek to:
 - i. ensure new retail development, wherever possible supports the role of town centres as the principle location for shopping activities;
 - ii. ensure that the continuing vitality and viability of town centres is maintained and enhanced; and
 - iii. ensure provision in the plan for retail activities appropriate to meet the needs of the population targets for 2022.
3. On foot of the submissions received additional clarity will be brought to text and objectives in the Draft Plan which relate to:
 - iv. Unlocking potential of town centre sites;
 - v. Encouraging town centre regeneration and improvement of the public realm;
 - vi. Providing guidance for individual retail settlements in line with the hierarchy;
 - vii. Recognition that smaller convenience stores are likely to have a reduced impact on vitality and vibrancy than larger supermarkets or hypermarkets;
 - viii. Encouraging retail flexibility (within the parameters of the guidelines);
 - ix. Encouraging a high standard of design in retail proposals;
 - x. Providing guidance regarding the most appropriate location for retail development;
 - xi. Confirmation that vacancy, extant permissions and other issues will be a consideration in assessing development proposals;
 - xii. Clarity regarding the status of the retail core and town centre expansion areas and how the sequential test will be applied; and
 - xiii. Flexibility with regard to appropriate uses within town centres

There were a number of specific issues raised in relation to individual towns. Many of these were not of a strategic nature and would be most appropriately dealt with within individual local area plans/town plans during their review process.



Table 2.7 – Suggested Retail Network/Hierarchy (set within County and Metropolitan Context)

Type	Locations	General Retail Function & Strategy
Metropolitan	Cork City Centre	Principal urban centre in the county and region. Centre for high order comparison shopping and functions of a specialist nature. Promote the City Centre as the primary retail centre, particularly for higher order comparison goods.
Regional	Mallow, Clonakilty	Hub Towns and other towns performing an important regional retail function, particularly comparison, beyond their immediate catchment. Convenience retail at level to support own catchment. Comparison with no upper limit provided location and other normal planning considerations is acceptable. Planned retail parks can be considered where a justification is evident and any adverse effects on the town centre can be avoided.
Sub-Regional/ Metropolitan Cork District Centres	Blackpool, Douglas, Wilton, Ballyvolane, Mahon Point, Cork Docklands, Holyhill.	Districts – Established centres generally characterised by a large convenience/comparison anchor, a range of low order comparison outlets, local retail facilities, ancillary specialist convenience outlets, community and social facilities. Primarily to serve their catchments To support the vitality and viability of District Centres to ensure that such centres provide an appropriate range of retail and non-retail functions to serve the needs of the community and respective catchment areas, with an emphasis on convenience and appropriate comparison shopping, in order to protect the primacy of Cork City Centre. Preference for retail park developments to locate in or adjacent to District Centres, to ensure the potential for linked trips and commercial synergy. Cautious approach to proposals for edge/out of town retail warehouse developments.
Sub-Regional /Large Metropolitan Towns	Ballincollig, Carrigaline, Cobh and Middleton	Perform an important sub county retail role and generally include a good range of convenience provision and a modest provision of comparison offer. Such towns generally serve a large rural catchment. To support the vitality and viability of the metropolitan towns and to ensure that such centres provide an appropriate range of retail and non retail functions to serve the needs of the community and respective catchment areas. Preference for retail park developments to locate in or adjacent to the Town Centres, to ensure the potential for linked trips and commercial synergy. Cautious approach to proposals for edge/out of town retail warehouse developments.
Sub-Regional/ RingTowns/ Large County Towns	<u>Ring Towns:</u> Youghal, Macroom, Bandon, Fermoy, Kinsale <u>Larger Towns:</u> Mitchelstown, Charleville, Skibbereen, Bantry, Kanturk.	Ring and Larger County Towns which generally perform important sub-county retailing functions and include some of the major retailing chains, particularly convenience. In general these have a population in excess of 5,000 or are designated as Ring Towns in consecutive plans. To support the vitality and viability of the Ring and Larger towns and to ensure that such centres provide an appropriate range of retail and non retail functions to serve the needs of the community and respective catchment areas. Cautious approach to out-of-centre retail warehousing.
Smaller Metropolitan Towns	Carrigtwohill, Glanmire, Passage West, Blarney, Monard.	Small towns within the metropolitan area which perform an important retail role for their catchment. It is an objective to strengthen and consolidate the retail role and function of the smaller metropolitan towns and to provide retail development in accordance with their planned population growth to serve their local catchments. Cautious approach to out-of-centre retail warehousing.
Smaller County Towns	Millstreet, Castletownbere, Dunmanway, Newmarket, Schull, Buttevant.	Smaller County towns generally with a population of 1500 or less. Often they provide basic convenience shopping, either in small supermarkets or convenience shops. Comparison shopping is often small scale e.g. hardware, retail pharmacies and clothes shops. To support the vitality and viability of the Smaller County Towns and to ensure that such centres provide an appropriate range of retail and non retail functions to serve the needs of the community and respective catchment areas. Cautious approach to out-of-centre retail warehousing.
Neighbourhood centres and large villages	Unnamed	Provide basic convenience shopping and generally limited comparison shopping on a small scale and other ancillary retail services serving a localised catchment. It is an objective to support, promote and protect neighbourhood and local centres, villages and corner shops which provide an important retail service at the local level.
Local centres, corner shops and small villages	Unnamed	Local retail facilities which provide a valuable role in the communities they serve. It is an objective to support, promote and protect neighbourhood and local centres, villages and corner shops which provide an important retail service at the local level.





Key Issue 7: Energy (including Wind and Renewable Energy)

Summary of the main proposals set out in the Section 11 Consultation Document:

The challenge for the next County Development Plan is to develop an overall policy approach in relation to energy that:

- Facilitates the sustainable development of the County's oil and gas reserves;
- Protects the County's future capacity for the development of energy generating, processing, transmission and transportation infrastructure;
- Encourages the sustainable development of the County's renewable energy resources;
- Provides up-to-date strategic guidance for wind energy development, identifying those areas of the County with potential and those areas of the County that should be protected from this in the future.

The potential of the Whitegate area, as a preferred location, to play a key role meeting the State's energy requirements should be supported and the area protected from inappropriate development.

The County Development Plan also needs to provide guidance for the development of small scale renewable energy projects (excluding wind energy projects) with localised environmental impacts and these should be broadly supported.

The County Development Plan policy framework for wind energy projects is likely to have the most significant effects on the overall development of renewable energy generation projects throughout the County. Small scale projects to meet the on-site needs of individual electricity users or small communities with localised environmental impacts should be open to consideration throughout the County, including within urban areas and areas of high landscape value.

Large scale wind energy projects have the greatest potential to help the County fulfil its role in meeting National targets for renewable energy generation but are more complex and often have the potential for more widespread environmental effects. The County Development Plan needs to provide strategic guidance to indicate which areas of the County have potential for wind energy development and which areas do not.

Areas suggested as most suitable for large scale wind energy projects are:

- River Ilen Basin North of Skibbereen
- Area South of Macroom

Areas suggested as unlikely to be suitable for large scale wind energy projects:

- Towns & Villages
- Nature Conservation Areas: Areas designated for nature conservation at national level (including SPA's, SAC's & NHA's)



- Important landscapes (High): The main areas of the County where landscape and coastal scenery is of high importance include:

Cork City and Harbour (Subject to certain exceptions);

South Coast West of Cork Harbour;

West Cork Peninsulas;

Lee river valley; and

Gougane Barra.

The S11 Consultation Document also suggested that consideration could be given to the need to protect other important landscapes with the potential for sensitivity to wind energy development. These areas include:

South Coast East of Cork Harbour; and

North East Cork (including part of the Blackwater Valley).

Summary of the Principal Issues Raised in Submissions:

Submissions sought recognition for NORA (National Oil Reserves Agency) to assist in ensuring that Ireland meets its obligations under EU legislation and IEA (International Energy Agency) rules to maintain a minimum of 90 days stocks of oil on behalf of the State, to support the development of additional strategic oil reserves, recognise the role that the Bantry Bay Storage Terminal and Whitegate play in the energy sector in Ireland.

Submissions also stressed the importance of reinforcing the transmission system in SW Ireland and of developing renewable energy to secure energy supply and combat climate change.

Submissions emphasised the economic value of wind farm developments to the local and national economy and suggested that the sustainable energy proposals in the CDP need to provide strategic guidance for potential wind development areas and for community consultation.

Submissions noted that the majority of new renewable capacity will most likely be provided by on-shore wind but some claimed that the plan should include offshore wind and wave, carbon capture and pumped storage.

With regard to the areas indicated as unsuitable for large scale wind energy projects, few submissions challenged the proposed inclusion of the high value landscape areas and towns/villages in these areas. Many also supported the inclusion of nature conservation areas in these areas. However, it was suggested that excluding all Natura 2000 sites did not fully reflect EU guidance on the issue.

It was also suggested that those areas with low wind speeds should be excluded from any proposed 'open to consideration' area to avoid a risk of uneconomic wind farm developments. Some felt that open to consideration areas were too extensive.



Many expressed concern at the scale of onshore wind turbines, and their impact on humans in relation to noise and shadow flicker effect, their impact on the landscape, tourism, ecology and the development impact on roads.

Government Policy

The Government's aim is to reduce CO2 emissions and national reliance on imported energy by increasing the proportion of energy generated from the State's renewable energy resources and the National Renewable Energy Action Plan (NREAP) sets out the overall approach. The overall target is to achieve 16% of the national gross final consumption of energy comprising energy from renewable sources by 2020 by delivering the following changes:

- 40% consumption from renewable sources in the electricity sector (RES-E),
- 12% of energy consumption in the heat sector from renewable sources and
- 10% of transport energy from renewable sources.

The NREAP suggests that in the year 2020, wind energy will contribute 90% of Ireland's renewable electricity target of 5,111 MW.

The Wind Energy Development, Guidelines for Planning Authorities 2006 recommend that the development plan should set out the following policies and objectives:

A positive and supportive statement of the importance of wind energy as a renewable energy source which can play a vital role in achieving national targets in relation to the reductions in fossil fuel dependency and therefore greenhouse gas emissions, together with an objective to ensure the security of energy supply.

Objectives to secure the maximum potential from the wind energy resources of the planning authority's area.

The identification on development plan maps of the key areas within the planning authority's functional area where there is significant wind energy potential and where, subject to criteria such as design and landscape planning, natural heritage, environmental and amenity considerations, wind energy development will be acceptable in principle;

The specific criteria for wind energy development that the planning authority will take into account when considering any wind energy or related proposals in the key areas identified based on the recommended siting and design criteria referred to in these guidelines.

The investigation of the potential for relatively small-scale wind energy developments within urban and industrial areas, and for small community-based proposals outside the key areas that are identified as being appropriate for wind energy development.



Manager's Opinion

It is important to support the energy industry in County Cork including recognition of the strategic role of Whitegate and Whiddy Island in meeting the future energy needs of the county. Broad support for the continued development and upgrading on the transmission network is also an important issue in the future development of the county and particularly for the renewable energy sector.

Recent under-sea oil discoveries off the Cork coast emphasise the likely future importance of the Whitegate area. It is important to ensure that the future potential for large-scale energy industry in that area is not compromised by inappropriate development.

With some exceptions, the submissions have indicated broad support for the policy considerations as outlined in the S11 document relating to onshore wind which will form the basis for identifying areas which are suitable and areas which are not likely to be suitable for wind energy projects. There was no objection to the exclusion of Landscapes of High Importance as areas unlikely to be suitable for large scale wind energy projects.

No submissions were received in relation to two areas where the S11 Consultation Document suggested that some protection from large scale wind energy was likely to be appropriate but sought the views of the public in relation to suitable measures. These areas are: South Coast East of Cork Harbour and North East Cork (including part of the Blackwater Valley).

With regard to the south coast east of Cork Harbour, this is a relatively small coastal area important for recreation and tourism. Also, there are a number of significant nature conservation designations. Taking all these into account, it is considered appropriate to protect this area from large scale wind energy development.

The area of North East Cork is much more extensive and includes a number of important hill/mountain ranges including Ballyhoura Mountains, Nagle Mountains and Kilworth Mountains. Here, the proposal is to allow the consideration of large scale wind energy development to the west of the area but to restrict development in the east where wind speeds are lower and important scenic views prevail.

There is a need to carefully consider the possible impacts of wind energy developments on the amenity of towns, villages and individual dwellings in relation to visual impact, noise, and shadow/flicker. Whilst there is a general recognition of the importance of fully developing the County's wind energy potential, there is also evidence of significant public concern on this issue. It is suggested that the objectives of the Draft County Development Plan should provide appropriate protection for the various centres of population in the County, establishing a 'buffer zone' around the more significant centres.



Manager's Recommendation

- a) It is intended to include policies that support the sustainable development of the County's oil and gas reserves, protect the County's future capacity for the development of energy generating, processing, transmission and transportation infrastructure while also facilitating the continuance of power generation stations within the county.
- b) It is intended that the draft plan will recognise the strategic role of Whitegate and Whiddy Island in meeting the future energy needs of the county and will highlight the key role energy plays in the building of a sustainable future for the county.
- c) It is intended to include policy and objectives supporting the provision of electricity transmission network infrastructure in the draft plan and setting out the key considerations in assessing such proposals.
- d) An on shore wind energy strategy with policies, objectives and a map will be prepared for inclusion in the Draft plan based on the following considerations;
 - Areas likely to be most suitable for large scale wind energy projects including the River Ilen Basin North of Skibbereen and the Area South of Macroom.
 - Areas unlikely to be suitable for large scale wind energy projects including:
 - Towns & Villages: The urban areas comprising the towns and villages (with development boundaries) of the County are the locations where most people live and work. It is also intended to include buffer zones e.g. green belts around the main settlements where large scale wind energy projects will not be acceptable;
 - Nature Conservation Areas: Areas designated for nature conservation at national level (including SPA's, SAC's & NHA's) are generally inappropriate for large scale wind energy development.
 - Important landscapes: The main areas of the County where landscape and coastal scenery is of importance include: Cork City and Harbour (Subject to paragraph below*); South Coast West of Cork Harbour; West Cork Peninsulas; Lee river valley; Gougane Barra; south coast east of Cork Harbour and part of North East Cork.

**However around Cork City and Harbour it is suggested that in the major employment centres of Ringaskiddy, Whitegate, Carrigtwohill, Kilbarry and Little Island the current policy provision that allows for consideration of wind farm projects should be maintained.*

While these areas have intrinsic landscape qualities they also are significant destination areas for the County's tourism industry and large scale wind energy projects here could undermine this function. Some of these include areas of important landscape and coastal scenery that, although not of high importance, are considered to be of medium importance at a more local level. These areas also contribute to the overall attractiveness of the County for tourism and recreation purposes.

- e) Clear guidance on the issues that need to be taken into consideration in assessing any wind energy proposals will be provided. Any new guidance emerging from the current Department of Environment national review of the Wind Farm Guidelines relating to



separation distance for noise and shadow flicker will be incorporated into the draft plan if available.

- f) Proposals for Auto production i.e. generation and consumption of electricity in a single premises by a person, company or community where the primary purpose is the generation and consumption of energy on site will be considered on their merits in all areas of the county.
- g) Policies and objectives relating to other renewable energy developments and issues such as Hydro Power, Geothermal, Ground Collectors and Heat Pumps, Ocean Energy – Wave, Ocean Energy – Tidal, Off-Shore Wind, Solar Energy: Solar-Photovoltaic and Solar-thermal, Biomass and Anaerobic Digestion, Renewable Energy in Transport, community benefit, building energy efficiency and micro renewables will be considered in the draft plan based on the proposals set out in the Energy Background Study.



Key Issue: Green Infrastructure

1. Summary of the main proposals set out in the Section 11 Consultation Document:

The Planning and Development Amendment Act, introduced a requirement for development plans to provide 'a framework for identification, assessment, protection, management and planning of landscapes', 'management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species' and 'the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility'.

The Section 11 Consultation Document suggests that the most appropriate and effective way to address this broad requirement is through the inclusion in the Draft County Development Plan of a 'Green Infrastructure Strategy'.

The Section 11 Consultation Document outlines a series of key issues which the 'Green Infrastructure Strategy' should address.

2. Summary of the Principal Issues Raised in Submissions:

Several submissions welcome and support the proposal in the S11 Consultation Document to include a 'Green Infrastructure Strategy' for the County in the Draft County Development Plan. A specific submission proposes the inclusion of Blarney Castle in any such Strategy.

Several submissions also identify green routes for walking / cycling purposes around the county including the development of a green route along the disused Middleton to Youghal railway line.

3. Manager's Opinion

The Green Infrastructure concept involves the identification, protection, management and development of green corridors and spaces which can serve a number of functions and provide a range of benefits including the protection of water quality, protection against flood risk, protection against rising sea levels, provision of recreational spaces and protection of biodiversity. Green Infrastructure is about 'joined up' thinking; it is an integrated approach to planning and links land-use, landscape, services, ecology, heritage and transportation. It also leads to the effective integration of biodiversity and spatial planning.

The development of a Green Infrastructure Strategy can provide an overall framework for the development of existing and future amenity facilities across the county. The protection of a river corridor from inappropriate development for instance, not only has benefits in terms of protecting water quality and preventing flood risk, but can also provide significant opportunities for recreational facilities including walkways and cycleways in these areas, which can provide opportunities for tourism, attracting visitors, increasing income and employment.



The submissions received which support the development of a 'Green Infrastructure Strategy' are welcomed and it is intended to develop specific policy measures which will address the key green infrastructure issues identified in the S11 Consultation Document.

4. Manager's Recommendation

- a. Accordingly, it is proposed to include a 'Green Infrastructure Chapter' in the Draft County Development Plan, which will ensure compliance with the Planning Authorities requirements under the Planning and Development Act. It is considered that this chapter should address the following key issues:
 - Policies that seek to identify, protect, enhance and develop green corridors that can provide multiple benefits relating to the protection of the environment as well as providing opportunities for the development of tourism and recreational resources.
 - Promote and highlight the natural assets and key resources of the County as part of the approach to sustainable development in the future.
 - Aim to protect and where possible encourage the enhancement of biodiversity in the management of new development.
 - Help deliver 'green' solutions to issues such as flooding, climate change and coastal erosion.
 - Promote uses and activities which would protect and enhance the biodiversity value of an area.
 - Improving awareness of the concept of green infrastructure with the aim of providing a framework for the development of existing and future amenity facilities across the County.
 - Encourage the development of green routes for walking and cycling along disused rail lines around the county where appropriate and feasible.
 - The need to incorporate the best principles of green infrastructure into new developments.

