

Development Plan Submission,
Strategic and Economic Development
Cork City Council
City Hall
Anglesea Street
Cork
T12 T007

Monday, 4th October 2021
[By Online submission]

-: CORK CITY DRAFT DEVELOPMENT PLAN 2022 – 2028:-

Dear Sir / Madam

RE: SUBMISSION TO THE CORK CITY DRAFT DEVELOPMENT PLAN 2022 – 2028 IN RESPECT OF LANDS AT FORMER AUTOMOTIVE SHOWROOMS, CARRIGROHANE ROAD, CORK

Lidl Ireland GmbH – Site Specific Zoning Submission to remove the proposed *ZO 01 Sustainable Residential Neighbourhoods* zoning designation of the subject lands and assign *ZO 9 – Neighbourhood and Local Centres Zoning*, acknowledging that lands at the junction of Carrigrohane Road and Victoria Cross Road (proposed *ZO 9 – Neighbourhood and Local Centres Zoning*) are now being developed for Student Accommodation

1.0 INTRODUCTION

The Planning Partnership, The Coach House, Dundanion, Blackrock Road, Cork City are instructed by **Lidl Ireland GmbH**, Head Office, Main Road, Tallaght, Dublin 24, to prepare this *Site Specific Submission* in relation to the ongoing Cork City Development Plan Review process and the publication of the subsequent *Cork City Draft Development Plan 2022-2028*.

1.1 Focus of the Submission

The purpose of this submission is to seek the removal of the proposed *ZO 01 Sustainable Residential Neighbourhoods* zoning designation of the subject lands and assign the *ZO 9 – Neighbourhood and Local Centres Zoning*, acknowledging the lands being brownfield lands, fully serviced, that lands at the junction of Carrigrohane Road and Victoria Cross Road (proposed *ZO 9 – Neighbourhood and Local Centres Zoning*) are now being developed for Student Accommodation. It is requested that such be reflected/presented within the new *Cork City Development Plan 2022 – 2028*.

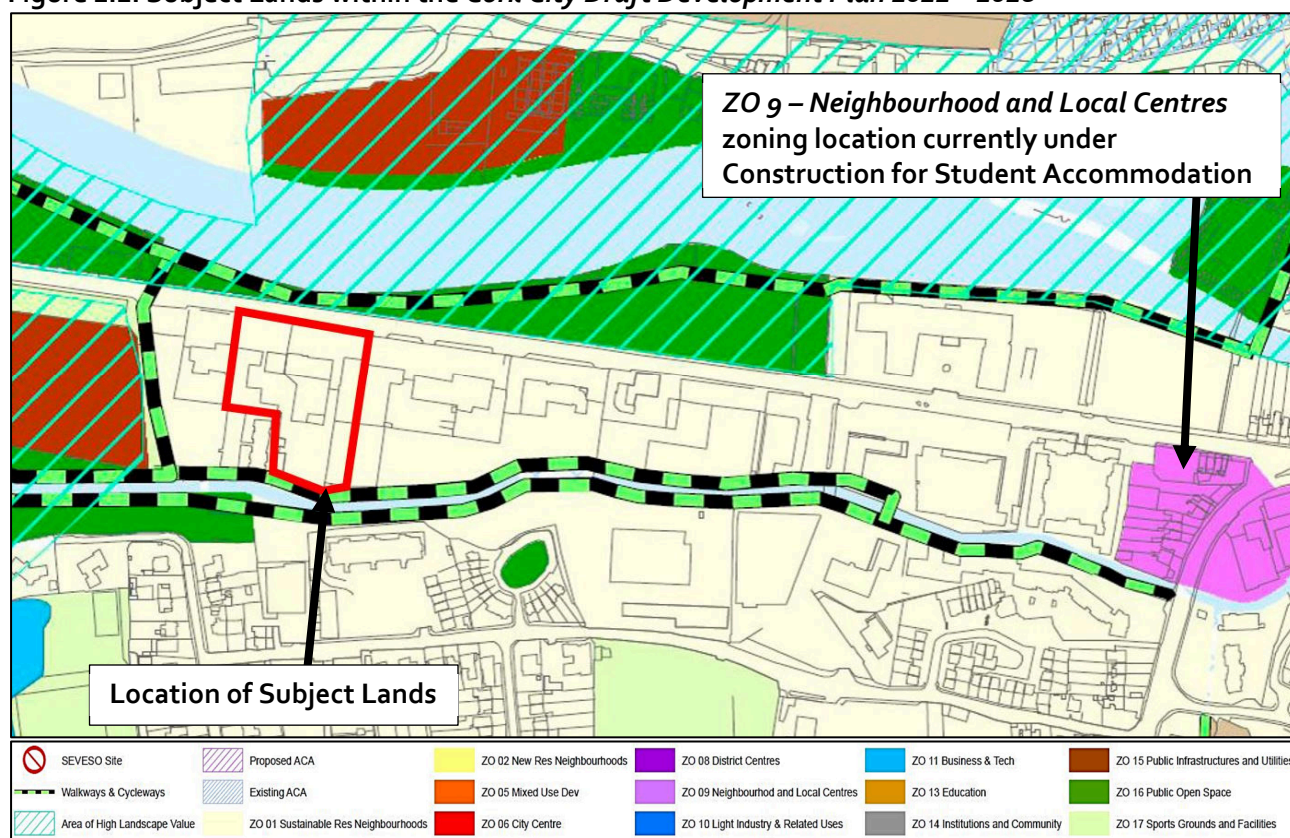
The location and extent of the subject lands is identified within **Figure 1.1** below.

The *ZO 9 – Neighbourhood and Local Centres* provides for local convenience shopping with development proposals serving local needs.

Figure 1.1: Location of the Subject Lands



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership, October 2021

Figure 1.2: Subject Lands within the *Cork City Draft Development Plan 2022 – 2028*

Source: *Cork City Draft Development Plan 2022 – 2028*, Zoning Map – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

2.0 NATIONAL AND LOCAL PLANNING CONTEXT

The following relevant extracts from national and local policy supports the current submission.

2.1 National Planning Framework – Project Ireland

NPO 4: *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

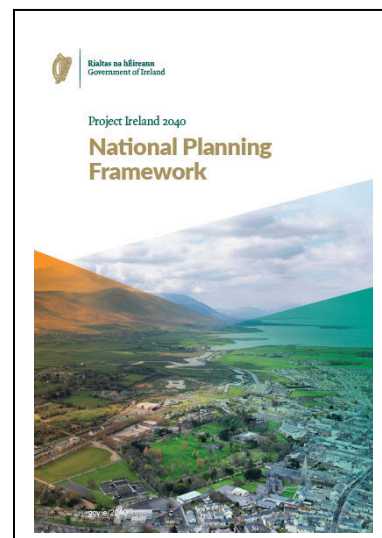
NPO 5: *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

NPO 27: *Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activities for all ages.*

NPO 28: *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*

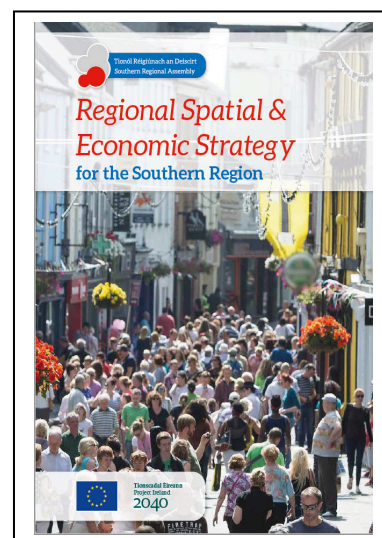


2.2 Regional Spatial Economic Strategy for the Southern Region

RPO 2 Planning for Diverse Areas: *The RSES recognises the strategic role played by all areas, both urban and rural, in achieving the set regional and national targets and objectives. The RSES supports sustainable enterprise growth, services, physical and social infrastructure investment and the sustainable growth of all communities in the Region. The overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region's strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage.*

RPO 10 Compact Growth in Metropolitan Areas: *To achieve compact growth, the RSES seeks to:*

- Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.*



- b. *Identify strategic initiatives in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP. Such strategic initiatives shall comply with MASP Goals to evolve innovative approaches for all MASPs. Initiatives may include:*
- *Support the creation and role of Active Land Management Units with a remit to focus on the metropolitan areas and compact growth targets;*
 - *Partnerships with the Land Development Agency to progress housing and employment delivery in city and town centres, focusing on co-ordinating and developing large, strategically located, publicly owned land banks, reducing vacancy and increasing regeneration of key sites;*
 - *Support the role of the local authority as a development agency to kick start regeneration processes;*
 - *Seek design competitions for key strategic sites that deliver greater density, mixed uses where appropriate, sustainable design, smart technology, green infrastructure and public gain through good design;*
 - *The identification of public realm and site regeneration initiatives which combine, on an area wide basis, opportunities for regeneration of private owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm areas; and*
 - *Creation of continually updated databases identifying brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets. Through active land management initiatives, identify strategic locations for residential growth responding to the growth targets and achievement of compact growth and employment growth.*

RPO 55 Retail: *It is an objective to:*

- a. *Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations in regeneration / public realm projects and other measures;*
- b. *Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category;*
- c. *Prepare Retail Strategies in accordance with the Retail Planning Guidelines including Joint Retail Strategies where applicable. Proposed public realm or urban regeneration projects should be assessed for potential impacts on the receiving environment including capacity of existing services at project level. Where public realm or urban regeneration projects would significantly increase shopper/visitor numbers, planning authorities should ensure that projects include sustainable management of increased demand for access to city/town centre locations.*

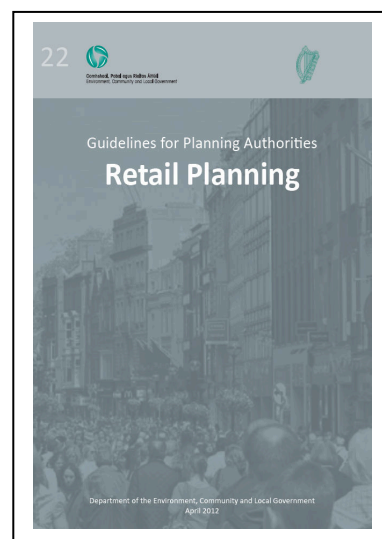
RPO 62 Location for Employment Development: *It is an objective to:*

- b- *Identify future locations for strategic employment development having regard to accessibility by sustainable transport modes and environmental constraints.*

2.3 Retail Planning Guidelines (2012)

2.5.3 Competitiveness in the Retail Sector: Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity.

The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.



2.5.4 Encouraging Sustainable Travel: While the private car tends to be attractive for activities such as more substantial convenience goods shopping or bringing home bulky goods, careful location of retail developments and attention to detail in terms of how they are connected by footpaths and cycle facilities to surrounding areas can substantially boost trips on foot or bicycle for smaller purchases and make a substantial difference in encouraging smarter travel in line with the Smarter Travel strategy.

2.5.5 Retail Development and Urban Design: Quality design aims to create attractive, inclusive, durable, adaptable places for people to work in, to live in, to shop in, or pass through.

Planning authorities should promote quality design in retailing in their development plan and/or retail strategies and then implement this through the development management process. This is of particular importance for retail development because of the dominant visual and use role it plays in a city, town or village streetscape.

3.3 Development Plans and Retailing: The function of the development plan is to establish an overall strategy for the proper planning and sustainable development of its area.

Specifically in relation to retailing, the development plan must be:

- Evidence-based through supporting analysis and data to guide decision making;
- Consistent with the approach of these guidelines; and
- Clear and concise with regard to specific objectives and requirements.

5- Set out strategic guidance on the location and scale of retail development to support the settlement hierarchy, including where appropriate identifying opportunity sites which are suitable and available and which match the future retailing needs of the area;

7- Mobility management measures- that both improve accessibility of retail areas while aiming to develop a pedestrian and cyclist friendly urban environment and vibrant street life.

4.4 Sequential Approach to the Location of Retail Development:

City and Town Centres: The centres of cities and towns are the most suitable locations for the higher order fashion and comparison goods and are the most accessible locations for the majority of the catchment population. They should be supported in maintaining and expanding their retail offer to serve that population in a sustainable way which will also help to reduce the need to travel.

4.9 Retail Impact Assessment: However, where a planning authority considers an application for planning permission to develop a new retail development to be particularly large in scale compared to the existing city/town/district centre, or where a retail strategy or development plan has allocated a specific type and quantum of retail floorspace to a particular settlement and a proposed development absorbs on one site the bulk of that potential retail floorspace, the planning authority may request the applicant, by way of a Retail Impact Assessment (RIA) as set out in Annex 5, to demonstrate compliance with the development plan and that there will not be a material and unacceptable adverse impact on the vitality and viability of any existing centre. This is a matter for careful technical assessment and professional judgement.

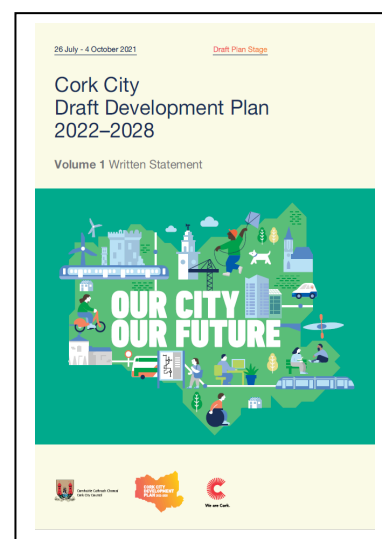
4.11.5 Retailing in Small Towns and Villages: The role of small towns and villages in the provision of retail services to their local urban and rural populations should be defined in development plans. Where appropriate, the maximum size of store, consistent with maintaining a variety of shops in the centre of these towns and villages and protecting an appropriate level of retail provision in the rural area, should be identified. In general there should be a clear presumption stated in favour of central or edge-of-centre locations for new developments.

4.11.6 Local Retail Units: Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.

2.4 Cork City Draft Development Plan 2022 – 2028

Objective 2.8 The 15-Minute City: To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City's liveability.

Objective 2.10 Mix of uses: Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.



Objective 7.30 Neighbourhood and Local Centres: To support, promote and protect Neighbourhood and Local Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. It is also aimed to support and facilitate the designation of new Neighbourhood and Local Centres where significant additional population growth is planned or where a demonstrable gap in existing provision is identified, subject to the protection of residential amenities of the surrounding area and that they are adequately served by sustainable transport. Proposals should demonstrate the appropriateness of the site by means of a Sequential Test, demonstrate retail impact and provide for a mix of uses appropriate to the scale of the centre.

Objective 7.36 Vibrant and Mixed-use Centres: a- To encourage a vibrant mix of uses, while retaining a healthy mix of retail uses within the designated centres and ensure they appropriately serve their population catchments.

b- To invest in and activate the public realm, while promoting accessibility and encouraging sustainable modes of transport as a means to travel to designated centres. This would encourage multi-purpose shopping, business and leisure trips as part of the same journey.

c- To support the independent retailing sector by continuing to provide financial support, skills training and education through the Local Enterprise Office and other means.

e- It is an objective to support and promote the use of on-street / outdoor markets in appropriate City Centre locations and the suburban District Centres and to pursue the development of a Market Strategy

- 2.5 Remove the proposed **ZO 01 Sustainable Residential Neighbourhoods** zoning designation of the subject lands and assign **ZO 9 – Neighbourhood and Local Centres Zoning**, acknowledging that lands at the junction of Carrigrohane Road and Victoria Cross Road (proposed **ZO 9 – Neighbourhood and Local Centres Zoning**) are now being developed for Student Accommodation

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective and vision for **ZO 9 – Neighbourhood and Local Centres** land use zoning are:

ZO 9 – Neighbourhood and Local Centres: To protect, provide for or improve local facilities.

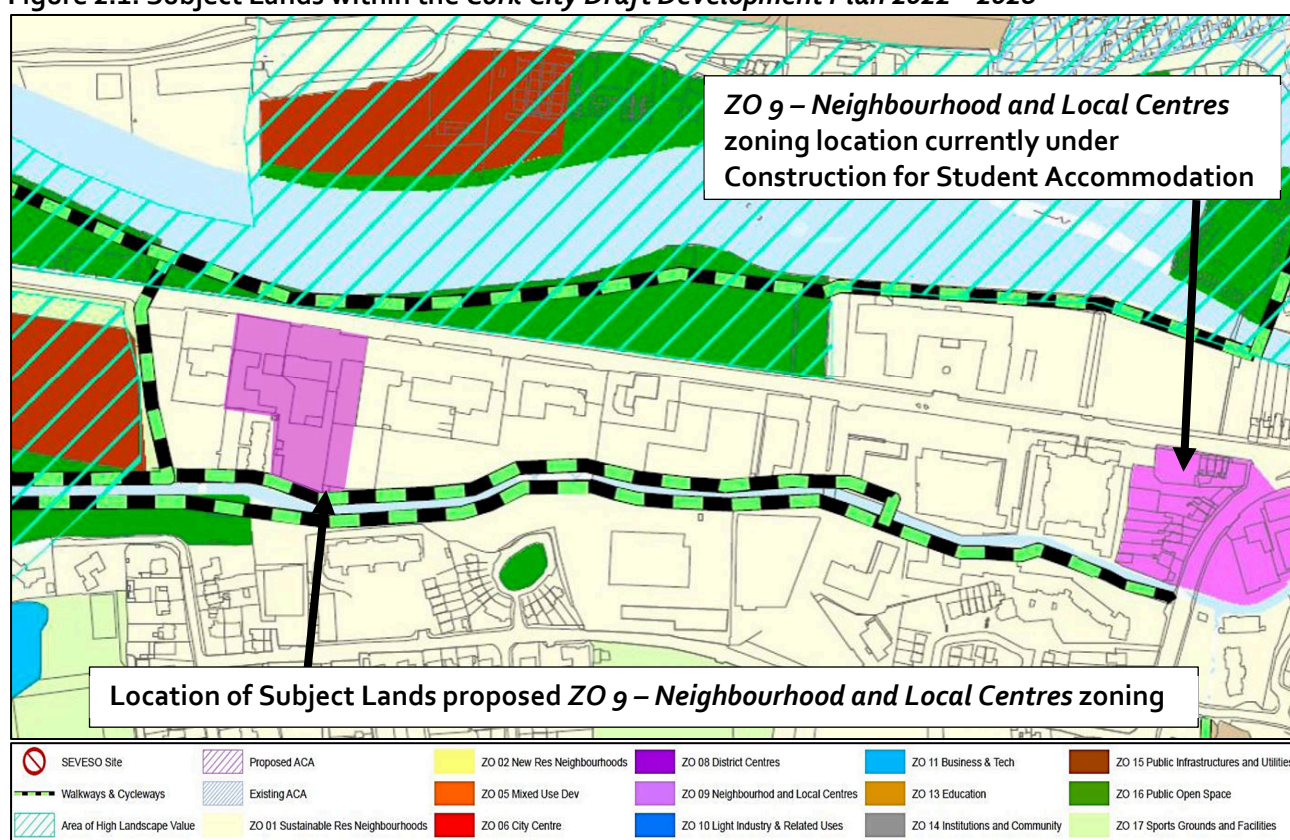
ZO 9.1: Neighbourhood and Local Centres contribute to sustaining liveable communities and neighbourhoods by fulfilling a **local convenience retail**, employment and service function, **providing a mix of uses and range of services**, at an appropriate local scale, to **the local population often within a 5- or 10- minute walking distance**. Chapter 7 Economy and Employment sets out further objectives for Neighbourhood and Local Centres.

ZO 9.2: Neighbourhood and Local Centres provide for local convenience shopping, however lower-order comparison shopping may also be open for consideration commensurate to the scale and character of the local centre and its function in the neighbourhood. Neighbourhood and Local Centres also provide a focus for other uses, including but not limited to local services, community facilities, cultural uses, educational uses, medical and healthcare uses, places of public worship, innovation or enterprise centres and limited retail offices. Neighbourhood and Local Centres should also include residential uses, particularly at higher densities that contribute to sustainable compact growth. These can be delivered particularly above ground floor level.

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

Having regard to the foregoing and noting that the subject lands are in close proximity to lands where a significant amount of Student Accommodation is currently under construction, including Student Accommodation construction on lands proposed to be zoned ZO 9 – Neighbourhood and Local Centres considered not reflecting the current pattern/use of development, and the surrounding existing Residential Neighbourhoods catchments, the rezoning the subject lands as ZO 9 – Neighbourhood and Local Centres provides the ability to present a logical form and pattern of development to support the sustainable and logical growth of the Carrigrohane Road catchment area.

Figure 2.1: Subject Lands within the Cork City Draft Development Plan 2022 – 2028



Source: Cork City Draft Development Plan 2022 – 2028, Zoning Map – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

All these facilities are located within 5-minutes walking distance of the Carrigrohane Road catchment area, and within the 15-minute walking distance of a wider mix of uses, including extensive residential areas and increased student population. This indicates the subject lands being rezoned as **ZO 9 – Neighbourhood and Local Centres** "support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city".

It is therefore contended that the proposed land should be rezoned for **ZO 9 – Neighbourhood and Local Centres** in the *Cork City Draft Development Plan 2022 – 2028* as the subject lands is consistent with the proper planning and sustainable development of the Carrigrohane Road catchment area.

3.0 CONCLUSION

In summary, we request the removal of the proposed *ZO 01 Sustainable Residential Neighbourhoods* zoning designation of the subject lands and assign the *ZO 9 – Neighbourhood and Local Centres* Zoning, acknowledging the lands being brownfield lands, fully serviced, that lands at junction of Carrigrohane Road and Victoria Cross Road (proposed *ZO 9 – Neighbourhood and Local Centres* Zoning) are now being developed for Student Accommodation. It is requested that such be reflected/presented within the new *Cork City Development Plan 2022 – 2028*.

This will have significant benefits to the existing residential catchment areas and increase student population, promoting the sustainable *15-minute City Compact Liveable Growth* concept.

Significant volume of appropriately located and zoned land for other uses including *Sustainable Residential Neighbourhood* is provided to the surrounding area, which is accessible within the 15-minutes, allowing for more active transportation and a wider range of uses and services available for the residents in the surrounding neighbourhood.

The subject lands represent an opportunity to provide:

- for a more logical Settlement Plan Boundary,
- for a more efficient use of fully served urban lands,
- for a more sequential and logical zoning pattern,
- for more sustainable '15-Minute City Neighbourhood Concept' patterns of development, and
- in greater accord with the Proper Planning and Sustainable Development of the Carrigrohane Road catchment area.

Should you have any queries or require any further information in relation to the above please do not hesitate to contact me.

Yours faithfully



Wessel Vosloo
Principal
The Planning Partnership