



COAKLEY O'NEILL
town planning

Submission to inform the Draft Cork City Development Plan 2022-2028

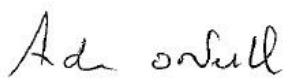
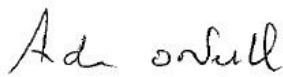
Lands at
Rathpeacon, Cork.

Prepared in October 2021 on behalf of
Progressive Commercial Construction Ltd.

Coakley O'Neill Town Planning Ltd.

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1.0 INTRODUCTION

- 1.1 We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, are instructed by Progressive Commercial Construction Ltd. to make this submission to the Draft Cork City Development Plan 2022-2028 in respect of lands in their ownership at Rathpeacon, Cork.
- 1.2 In the Draft Cork City Development Plan 2022-2028, the subject lands are proposed to be zoned "City Hinterland". The subject lands are currently zoned as part of the Metropolitan Cork Greenbelt in the current Cork County Development Plan 2014.
- 1.3 This submission seeks a revision to the draft zoning for the lands as a new Strategic Employment Location for the north of the City to facilitate the development of a new sustainable Business Park for light industry and related uses. This would more appropriately reflect the site's context, being located within Cork City boundary, contiguous to the existing built up area of the City, as a natural and logical extension to the existing Gateway Business Park, Northpoint Business Park, North Link Business Park, and Mallow Road Motors in the north of the City and would also assist Cork City Council in implementing the ambitious jobs targets for the City in the context of national and regional planning policy.
- 1.4 Given the significant unmet demand for such uses in Cork, were the Council to rezone these lands for Light Industry and Related Uses, permission for the proposed Business Park would be sought immediately and, assuming a positive outcome, will be constructed in the short-term.
- 1.5 We respectfully submit that the proposed lands to be rezoned represents a strategic opportunity for the City to deliver a significant Business Park in a highly sustainable location with good access to public transport promoted by a developer with a proven track record for delivering large employment generating projects in the immediate vicinity and indeed other parts of Cork City.
- 1.6 Notwithstanding the fact that the Council have identified other locations in the draft Plan for potential light industrial uses, this site, which is in the control of one developer, has a much higher probability of being delivered and contributing to the economic prosperity of the city during the lifetime of the draft Plan under consideration.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The lands are located in an edge-of-city area approximately 3.5km north-west of Cork City centre, 2.5km north-west of Blackpool, and approximately 1km east of the northern Cork City suburban village of Killeens. The site is bound to the west by Sweeneys Hill, to the east by the Cork-Dublin rail line, and to the south by existing residential uses, to the south-east by the Old Mallow Road. Mallow Road Motors, Northpoint Business Park, North Link Business Park and Gateway Business Park are located further south.
- 2.2 The lands measure c. 18.34ha (c. 45.33 acres) in area and comprise several agricultural fields in pasture. The majority of the site is currently in agricultural use. The site generally slopes in a north-south direction. Site boundaries include traditional stone walls and established hedgerows. The lands contain some mature trees and mature hedgerow field boundaries.

- 2.3 The subject site is located on the 215 bus route, with a bus stop located approximately 500m south of the site, with buses operating every 30 minutes to/from the city centre/Mahon.
- 2.4 There are no built heritage designations or national monuments on site, and the site is not located within a flood risk zone.



Figure 1. Subject lands (generally identified in red). (Source: OSi; Annotated by Coakley O'Neill Town Planning Ltd., 2021).

3.0 PLANNING POLICY PROVISIONS

This submission is made in the context of the following key proper planning and sustainable development provisions of national, regional and current and draft local planning policy.

3.1 National Planning Framework (2018)

- 3.1.1 The National Planning Framework (NPF) was published in February 2018, and is guided, in part, by the aim to achieve regional parity in the country by significantly growing the population and employment base of both the Southern Region and the Northern and Western Region over the next two decades to counterbalance the dominance of the Greater Dublin Area.
- 3.1.3 In relation to Cork, the NPF sets a population growth target of at least 50-60% for Cork City and its suburbs by 2040, to facilitate Cork becoming a city of scale so that it can become competitive with Dublin, as well as with other comparable European and UK cities of similar scale. These population growth projections will mean enabling the city to grow by twice as much to 2040 as it has over the past 25 years.

- 3.1.4 Coupled with this, National Policy Objective (NPO) 1c of the NPF also supports an additional 225,000 jobs in the Southern Region, with 50% of that to be focused in Cork City and suburbs (NPO 2a). Compact and sustainable growth are the key tenets of national and regional planning policy.
- 3.1.5 The NPF also highlights the requirement to grow and diversify Cork's employment base by creating the conditions to attract and retain talented innovators and entrepreneurs and to be accessible to investors. NPO Objective 11 states that there will be a general presumption in favour of development that can encourage more people and generate more jobs and activities within existing cities, towns and villages.

3.2 Regional Spatial and Economic Strategy for the Southern Region (2020)

- 3.2.1 The Regional Spatial and Economic Strategy for the Southern Region (RSES) was formally adopted in January 2020. Aligned with the NPF, the strategy acknowledges that, by 2040, it is likely that the population of the region will grow by 380,000 people to almost two million and that Cork is projected to be one of the fastest growing areas in the state over the next 20 years.
- 3.2.2 Regional Policy Objective (RPO) 10 of the RSES addresses the issue of compact growth and commits to the prioritisation of housing and employment development in locations within and contiguous to existing city footprints which can be served by public transport, walking and cycling.
- 3.2.3 The Cork Metropolitan Area Strategic Plan (MASP) included in the RSES states that the:

Distribution of population and employment growth in the metropolitan area must align with public transport investment, and focus on regeneration, consolidation and infrastructure led growth of the city and suburbs, existing hierarchy of metropolitan towns and the strategic employment locations.

3.3 Cork Metropolitan Area Transport Strategy (2020)

- 3.3.1 The Cork Metropolitan Area Transport Strategy 2040 (CMATS) was published in 2020 notes the 215 bus service, which runs along the southern boundary of the subject lands, as an existing high frequency bus service within the Cork Metropolitan Area.
- 3.3.2 According to CMATS, the subject lands are:
- Bounded to the east by the public transport rail corridor, which is proposed to be developed as a 10-minute high-frequency commuter rail service, with stations at Monard (c. 1.5km north-west of the subject lands) and Blackpool/Kilbarry (c. 1.5km south-east of the subject lands);
 - Bounded to the south by a core bus corridor;
 - At an intersection between that core bus corridor and a future orbital bus route;
 - Bounded to the south by a future secondary cycle network route;
 - In the immediate vicinity of a future primary cycle network route that will cross the rail line c. 75m south of the south-eastern corner of the subject lands;
 - In the immediate vicinity of a high priority Bus Connects route at the same location as the primary cycle network route mentioned above;

- In the immediate vicinity of part of the indicative route for the Northern Distributor Road.

3.4 Cork City Draft Development Plan 2022–2028

- 3.4.1 Under the Cork City Draft Development Plan 2022-2028 the subject lands are currently zoned as ZO 21 “City Hinterland”, with the corresponding land use zoning objective being as follows:
To protect and improve rural amenity and provide for the development of agriculture.
- 3.4.2 It is estimated that approximately 31,000 jobs will need to be created in Cork City by 2028. Table 7.1 of the draft Plan indicates that the majority of these will be in office and manufacturing/light industry employment (23,870 (77%)).
- 3.4.3 It is also noted in section 7.17 of the draft Plan a proactive, flexible economic strategy in identifying and zoning employment land has been adopted, which also seeks to positively respond to wider challenges that includes targeting neighbourhoods where there are relatively high levels of unemployment, creating inclusive and sustainable communities, and anticipating likely market trends over the period to 2028.
- 3.4.4 Section 7.36 of the draft Plan identifies that a Cork City Strategic Employment Locations Study (SELS) (2021) was commissioned to inform the draft Plan up to 2031. Section 7.37 notes that there is a need to ensure that Cork City can compete for internationally mobile investment and to provide opportunities for existing business to relocate to larger premises. It is also stated that the dynamic nature of economic development emphasises the need to plan ahead to deliver serviced strategic employment sites. A jobs target of c. 31,000 jobs to 2028 has informed the preparation of the Development Plan.
- 3.4.5 In addition, section 7.38 notes that there is 650ha of employment zoned land in Cork City, of which 417ha is undeveloped. However, 63% of these undeveloped lands are spread across five sites (Tivoli, Kilbarry, Ballincollig, Cork International Airport and CSIP) all of which have longer term development trajectories. It is stated in the draft Plan that it is the intention to reprioritise this into a more realistic development framework that included reviewing all of the identified growth locations.
- 3.4.6 Finally, section 7.39 of the draft Plan notes that, in transposing the target jobs growth into zoned land requirements and taking into account the additional zoned land required to facilitate future decanting of up to 4,000 jobs from regeneration areas including City Docks, Tivoli and areas under regeneration influence such as Tramore Road, a minimum zoned employment land target of 228ha to meet office, manufacturing and light industry employment related needs has been identified.
- 3.5.6 Section 7.41 of the draft Plan therefore identifies 6no. Strategic Employment Sites to support social inclusion, attract strategic investment and harness economic opportunities in a sustainable manner.

4.0 SUBMISSION

- 4.1 The subject lands have recently been acquired by JCD Group¹, who are one of the most active industrial property developers in the Cork area. To date, JCD has completed c.170,000 sq. ft of industrial buildings in nearby Blarney Business Park over the past 3 years, are currently on site with a further 100,000 sq. ft. and are due to commence 110,000 sq. ft. in quarter three 2021. By mid-2022 there will have been 390,000 sq. ft. delivered in Blarney. JCD has previously completed North Point Business Park, North Link Business Park and Gateway Business Park which combined total over 400,000 sq. ft. and are fully occupied facilitating the provision of hundreds of jobs.
- 4.2 JCD is acutely aware of the current demand for modern, high quality, high bay light industrial, distribution, and warehouse units in a landscaped setting in close proximity to the City and to major road networks.
- 4.3 The proposed development would very much align with best principles from a sustainability perspective by being located on public transport routes and close to a densely population area to provide a local workforce and bring direct benefits to a part of the city which has traditionally been disadvantaged. Furthermore, the proposed development would be built to the latest sustainability standards. The developers, JCD Group, have a track record for being innovators in relation to the sustainable design and delivery of best-in-class buildings.



Figure 2: Recently completed unit on the Blarney Business Park developed by the JCD Group.

¹ Progressive Commercial Construction Ltd, in whose name this submission is made, is a company within the JCD Group

4.4 There is substantial evidence of heightened demand and lack of availability for industrial units - which is hampering economic growth in the City - from the property advisors active in the Cork region, who report as follows:

- Cushman and Wakefield Cork Industrial Market Report Q3 2020:
 - *'Following an incredibly strong opening half to the year, take up in the Cork industrial market reached 54,750 sq m in the nine months to the end of September 2020. The industrial market has fared well throughout the COVID-19 pandemic, with occupiers looking to expand their operations on both short- and long-term bases. The Cork industrial market looks poised to have its strongest year of take up since 2005. Take up in the year to date has been concentrated in the North East, in line with trends in availability'.*
 - *'There continues to be an acute shortage of available space in the market. Availability in the Cork industrial market stood at 43,650 sq m at the end of September, with a vacancy rate of just 3.5%, suggesting a significant pinch point in the market. Of the available space in the Cork market, just 23% is of Grade A quality, with Grade B and Grade C spaces accounting for 40% and 37% respectively. In addition, occupiers who require large floorplates are restricted in their choices'.*
 - *'vacancy rates are anticipated to remain exceptionally low'.*
 - *'The industrial sector has continued to perform well, with multiple large occupier requirements for the Cork market, partly due to the increase in e-commerce activity. Demand for prime well-located industrial accommodation remains strong but transactional activity is being hampered by the lack of availability of high-quality Grade A stock'.*
- Lisney Outlook Report 2021:
 - *Industrial property was one of the most resilient sectors of the commercial property market in 2020.*
 - *While 330,000 sqm of take-up was slightly below last year's annual activity figures, it was well ahead of the long-term average (270,000 sqm). Also importantly, it was not fully representative of market demand given the lack of suitable available property*
 - *Domestic and international investor demand in the sector is very strong, however in recent years very few institutional-grade industrial investment opportunities have been on offer*
 - *For both Irish and UK companies who import/export to and from the UK and Ireland, it would be prudent for them to hold extra stock. This will result in additional space requirements to ensure supply chains are not disrupted, including bonded warehouses.*
- Lisney Report Q2 2021:
 - *8,730m² industrial accommodation take-up at the end of Q2 2021 in Cork, 50% higher than the previous quarter (Q1).*
 - *There is only 2.2% vacancy at the end of Q2 2021.*

Noting the significant demand for industrial floorspace in Cork reported by both Cushman & Wakefield and Lisney, and the vacancy level reported by Cushman & Wakefield in September, 2020 of 3.5%, which, as reported by Lisney has tightened further to 2.2% by Q2 2021, the need for further quality industrial accommodation in Cork is clearly demonstrated.

- 4.5 Having regard to the provisions of Chapter 7 of the draft Plan as set out in Section 3.0 of this submission, it is proposed to request a rezoning of the subject lands from City Hinterland to Light Industry and Related Uses, to facilitate the development of a new, high quality, modern Business Park that will deliver additional employment in a deprived area of the City, assist in rebalancing the City, and contribute to balanced regional development.
- 4.6 This submission is made in the context of Cork City Council's economic strategy for the City set out in Chapter 7 of the draft Plan, which:
- espouses a proactive, flexible economic strategy in identifying and zoning employment land, which, critically in the context of the location of the subject lands in the City's northside, also seeks to positively respond to wider challenges that includes targeting neighbourhoods where there are relatively high levels of unemployment, creating inclusive and sustainable communities, and anticipating likely market trends over the period to 2028.
 - is alive to the need to ensure that the city can compete for internationally mobile investment and to provide opportunities for existing business to relocate to larger premises.
 - recognises the need to plan ahead to deliver serviced strategic employment sites.
 - is focused on delivering the jobs target of c. 31,000 jobs to 2028.
 - has re-evaluated existing employment lands that are only likely to be delivered in the long-term in favour of a more realistic portfolio of zoned employment land that can be developed over the period of the draft Plan.
 - has accordingly identified as a minimum c. 228ha of additional zoned employment land and has, so far, identified 6no. Strategic Employment Sites.
- 4.7 It is evident that the Council will be amenable to considering zoning additional lands for employment uses that will, in particular, support disadvantaged local communities, and that will be delivered over the lifetime of the draft Plan.
- 4.8 In this context, it is noted in Section 7.42 of the draft Plan that c. 243ha of zoned, undeveloped employment land has been identified over the period to 2028. The majority of this land comprises the identified 6no. Strategic Employment Sites, which total some 144.2ha, or c. 60% of employment land. However, there is no indication in the draft Plan if all 6no. Strategic Employment Sites are constraint free, in single ownership and are either serviced or serviceable to be able to be brought forward for development in the short-term to meet market demand.
- 4.9 It is in this context that the suitability of the lands at Rathpeacon as a new Strategic Employment Site for the northside of the City is being presented. These lands:
- Are in single-ownership
 - Are contiguous to the existing built up area of the northside of the City
 - Adjoin existing business parks including Northpoint Business Park, North Link Business Park, Gateway Business Park, and Mallow Road Motors, and will effectively constitute a natural and logical extension to these existing Business Parks, and the creation of a cluster of employment

lands which will benefit from commercial synergy, and will strengthen the function of the Mallow Road area as an employment hub for the City, offering a range of good quality, sustainable jobs

- Are accessible from the local road network and is close to the major road network
- Have existing services connections and Irish Water has confirmed through pre-connection enquiries that connection to Irish Water infrastructure is feasible, subject to local upgrades:
 - In relation to water supply, there is a 100mm diameter watermain on the road adjacent to the site. This main is fed from a 180mm HDPE watermain running along the Old Mallow Road. There is also a 50mm diameter main shown running on the Old Whitechurch Road.
 - A 300mm diameter combined sewer is located to the south of the lands
- Can be serviced with 10KV Three Phase power, which can be extended from the Gateway 10KV system
- Can be serviced by natural gas
- Can be serviced by an extended telecoms network servicing the nearby Gateway Business Park
- Are capable of accommodating a modern high quality, high bay Business Park accommodating light industrial, distribution, and warehouse units of varying sizes to meet market demand in a high quality landscaped setting

4.10 In this context, and as illustrated in Plate 1, the lands could potentially accommodate a mix of large, medium and small-scale business and enterprise units, accessed via a new junction with an upgraded Old Mallow Road with footpaths and a cycle track, and appropriate sightlines, as illustrated in Plate 2. Detailed discussions have been held with the roads department of Cork City Council in relation to the proposed access junction..

4.11 This submission therefore requests the following:

- **To identify c.18.34ha (c. 45.33 acres) of lands at Rathpeacon, Cork as a new Strategic Employment Location for the north of the City, and to rezone these lands from City Hinterland to Light Industry and Related Uses, to facilitate the development of a new sustainable Business Park**



Plate 1. Indicative Business Park layout

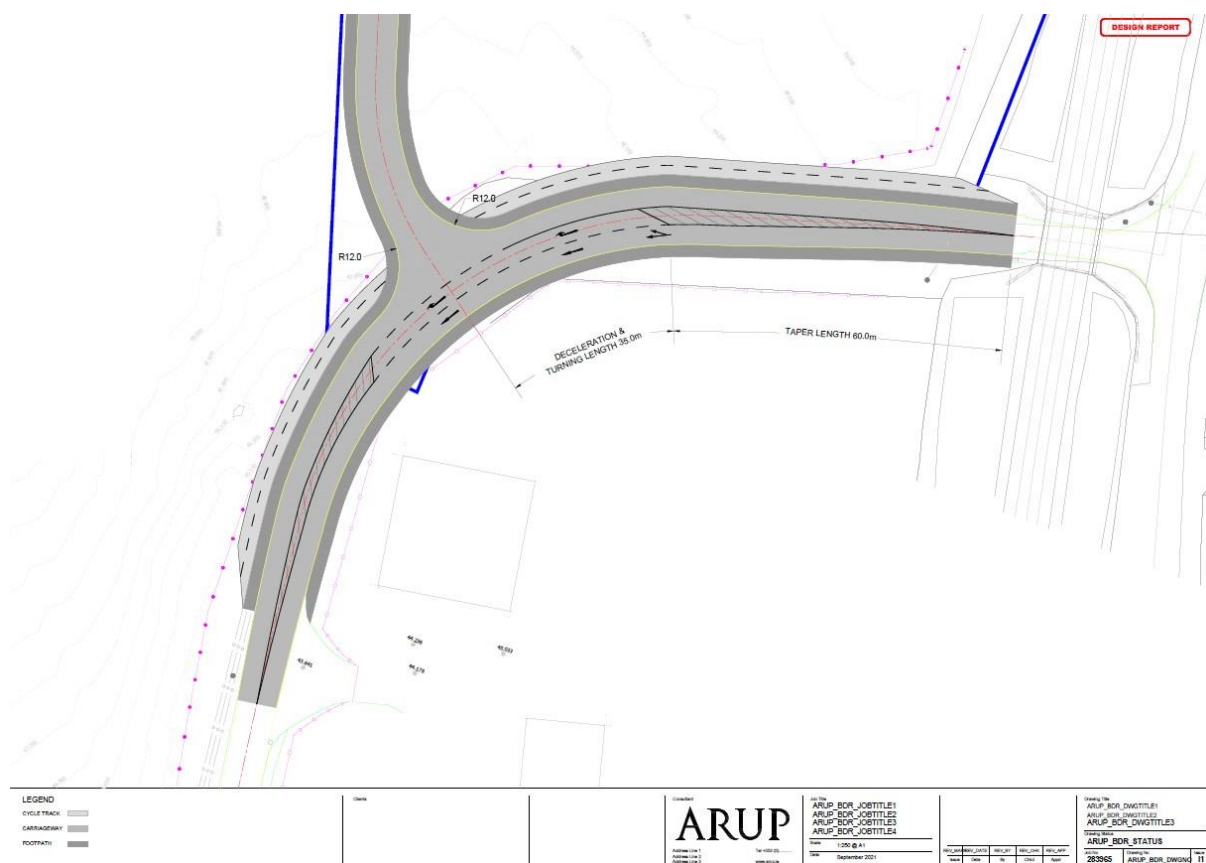


Plate 2. Indicative new junction layout

5.0 CONCLUSION

5.1 In conclusion, and in response to the clear evidence of significant demand for industrial units in Cork, and having regard Cork City Council's proactive, flexible economic strategy for the City as set out in Chapter 7 of the draft Plan, this submission seeks:

- **To identify c.18.34ha (c. 45.33 acres) of lands at Rathpeacon, Cork as a new Strategic Employment Location for the north of the City, and to rezone these lands from City Hinterland to Light Industry and Related Uses, to facilitate the development of a new sustainable Business Park**

5.2 JCD Group would be pleased to engage further with Cork City Council on the contents of this submission.

5.3 Please refer all correspondence to Aiden O'Neill, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Cork.