



Submission to Draft Cork City Development Plan 2022 -2028

Building Heights in the South Docklands

Comer Group

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01. Introduction

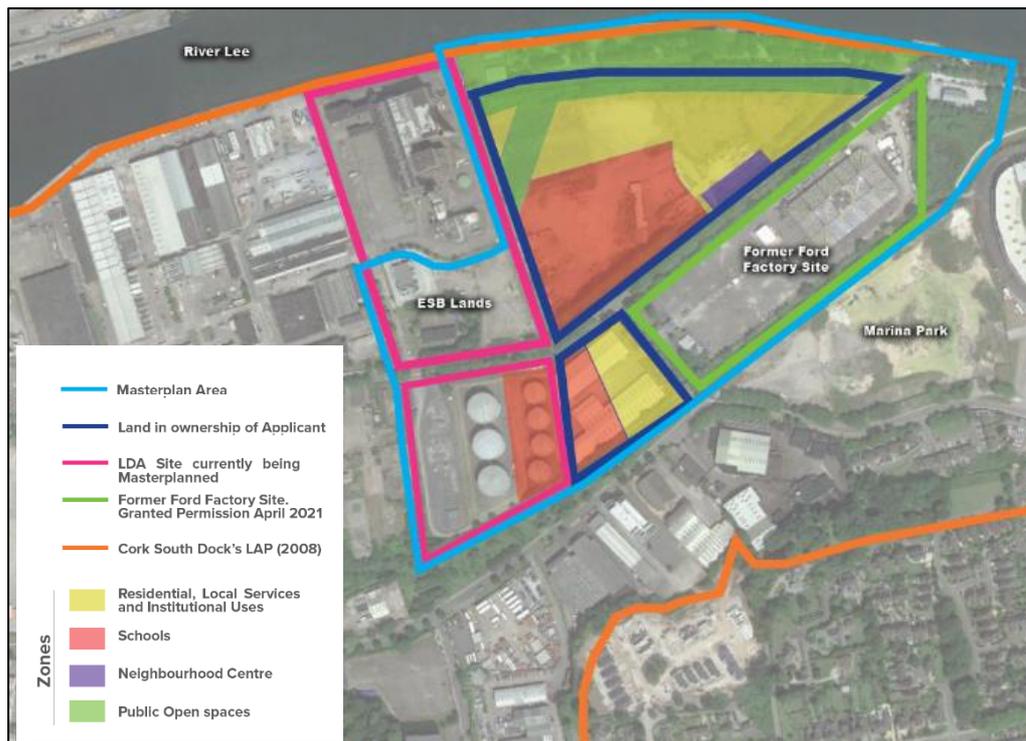
1.1 SUBMISSION PURPOSE

This submission has been prepared on behalf of the Comer Group in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 - 2028 (Draft CDP). Specifically, this submission responds to the Council's draft policies and zoning objectives for the South Docklands pertaining to height which will form part of the Cork City Development Plan 2022-2028.

This submission will address the proposed height strategy envisaged for the South Docklands set out in the Draft Plan which is informed by the recently published Cork City Urban Density, Building Height and Tall Building Study.

For reference the extent of lands in our client's ownership are outlined in Figure 1.1.

Figure 1.1 Subject Lands outlined in blue



1.2 SUBMISSION REQUEST

We request that the reference to a maximum of 6 no. storeys along the river's edge in the South Docklands should be omitted in the next phase of the Development Plan process and that the target height range should not have a maximum value. The height of any future redevelopment should be fully reliant on site specific assessments having regard to technical considerations.

02. Planning Considerations

2.1 PROVIDING GREATER HEIGHTS IN THE SOUTH DOCKLANDS WILL ENCOURAGE INCREASED DENSITIES TO CREATE A NEW URBAN CITY QUARTER

The Draft Cork City Development Plan 2022 – 2028 identifies the South Docks as a “significant long-term regeneration opportunity for Cork and Ireland...” which will “...generate a new character in what will be a radical transformation.” Albeit the Draft Plan acknowledges that the South Docklands are less sensitive to change, it directs that the “majority of new buildings should range generally in height from 6 to 10 storeys with exceptional opportunities for tall buildings at appropriate locations within the area...riverside development should step down, generally to 6 storeys.”

On review it is our considered opinion that the Draft Plan has taken a conservative approach to heights in the South Docklands that will fail to deliver the “radical transformation” desired in this area.

2.1.1 The Draft Cork City Development Plan 2022-2028

The Draft Plan outlines that “Cork City Council has identified the City Docks as the strategic area for tall buildings in Cork. Within the City Docks four zones appropriate for tall building have been outlined that will provide the focus for tall buildings to be developed to provide landmarks within the City Docks.” Our client’s lands are located within Marina Quarter, Wharf Quarter, Canal Walk and Polder Quarter, also referred to as the “Eastern Gateway/ Marina Walk/ Polder Quarter” which is described in the Draft Plan as where the “eastern end of Centre Park Road fronts onto the and (sic) River Lee and forms the visual gateway to the City Docks adjacent to the proposed ‘Eastern Gateway Bridge.’”

In respect of the above area, it is stipulated that “The City Docks Tall Building Zones are the only locations considered appropriate for this densest form of development in Cork.” Further to this Table 11.1 guides that heights of 5 – 10 no. storeys are targeted and note that the upper limit is “potentially suitable for exceptional tall building(s).”

Figure 2.1 Building Height Strategy (Draft Cork City Development Plan 2022

	Heights			
	No. of Storeys			
	Prevailing		Target	
	Lower	Upper	Lower	Upper
City	2	5	4	8**
City Centre	2	5	4	6
North Docks	2	3	4	7
South Docks	2	4	5	10**

-2028)

The guidance on heights in the Draft Cork City Development Plan 2022-2028 are underpinned by the Cork City Urban Density, Building Height and Tall Building Study.

We highlight that the study directs that *“Appropriate building heights will therefore need to be justified on a case by case basis and cannot be justified simply by the guide and target numbers in this strategy table”*.

In this context and in consultation with Urban Strategies, who have been appointed by Comer Group to assist in Master Planning for the lands, we submit that the proposed 5 – 10 no. storey target range is too restrictive and will discourage greater heights and high density development from being delivered.

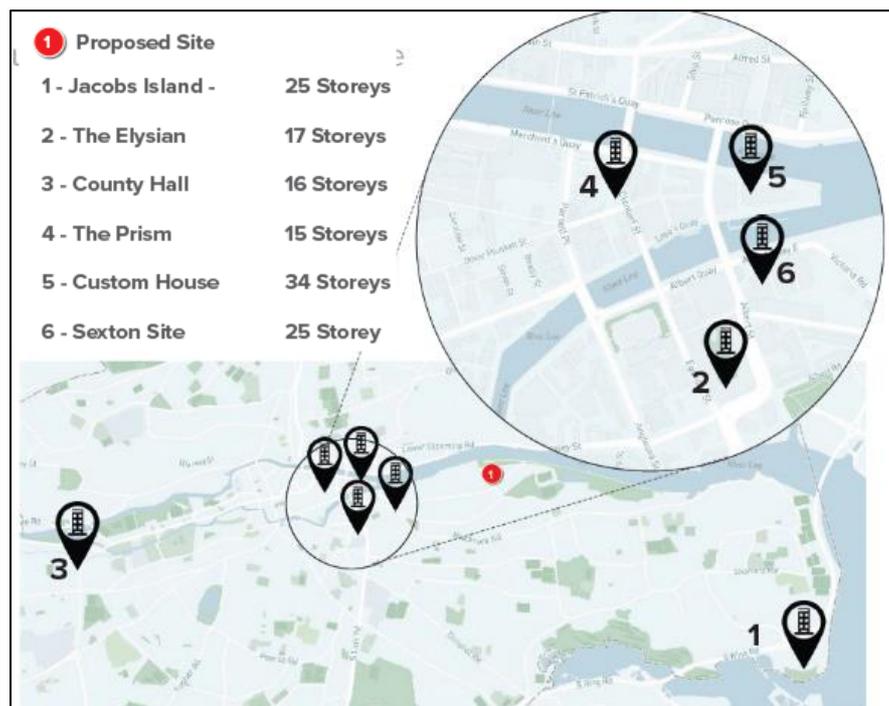
Further we are of the considered opinion that the proposed 5 – 10 no. storey target range for the South Docklands conflicts with the need for higher density developments. We highlight the study states that *“Establishing a range of appropriate building heights across all areas will help to ensure the best use of land is made, particularly in locations considered appropriate for higher density development.”*

It has been established that the South Docklands are appropriate for high density development, however the study indicates that *“more recent major developments have tended to rise to 6 and 7 storeys with some taller exceptions. In view of the heritage assets and potential harm new development could have on local character, infill and redevelopment opportunities should continue to make the best use of lands with new development expected to generally range from 4 to 6 storeys.”*

In terms of the emerging height(s) and urban form we highlight that heights of up to 34 no. storeys have been permitted at the Custom House Site in Cork City in recent times with heights of 14 no. storeys also permitted on Former Ford Factory lands in the South Docklands.

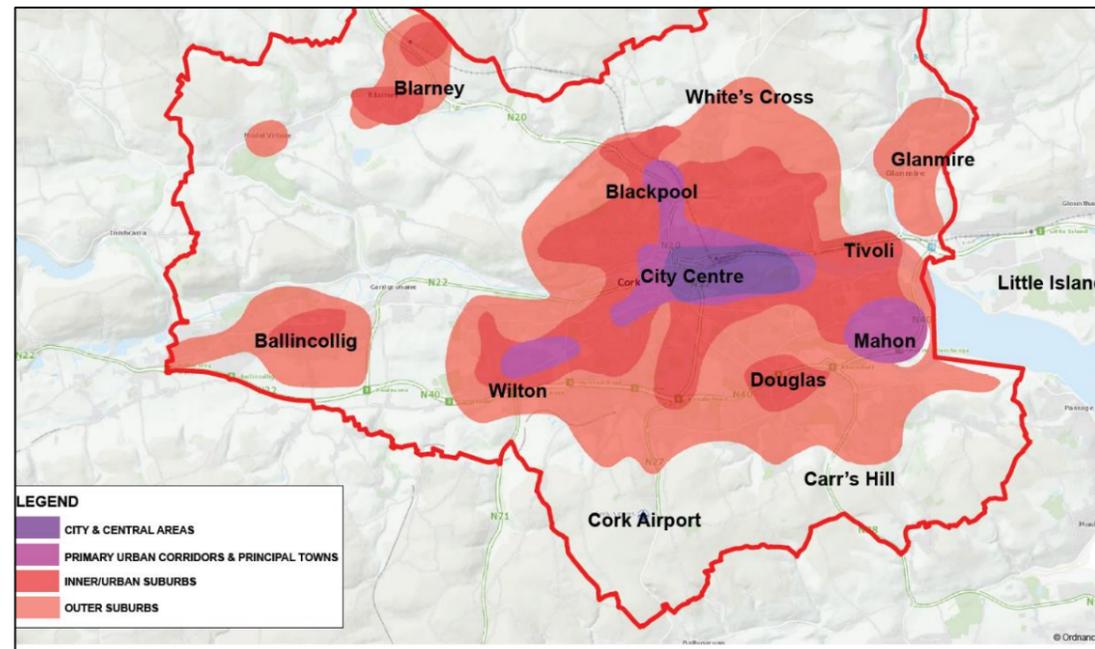
For reference C+W O’Brien have prepared the following graphic indicating the location of permitted developments of relevance.

Figure 2.2 Extract From Proposed Masterplan



Also of note, section 11.36 of the Draft Plan dictates that *“the phased redevelopment of this industrial area will generate a new character in what will be a radical transformation. The area is therefore significantly less sensitive to change and is correspondingly the most appropriate location for taller and tall buildings in the City.”* This is also indicated on the Spatial Density and Building Height Strategy where the South Docklands are indicated as *“City & Central Areas”*.

Figure 2.3 Extract from the Spatial Density and Building Height Strategy (Draft Cork City Development Plan 2022 -2028)



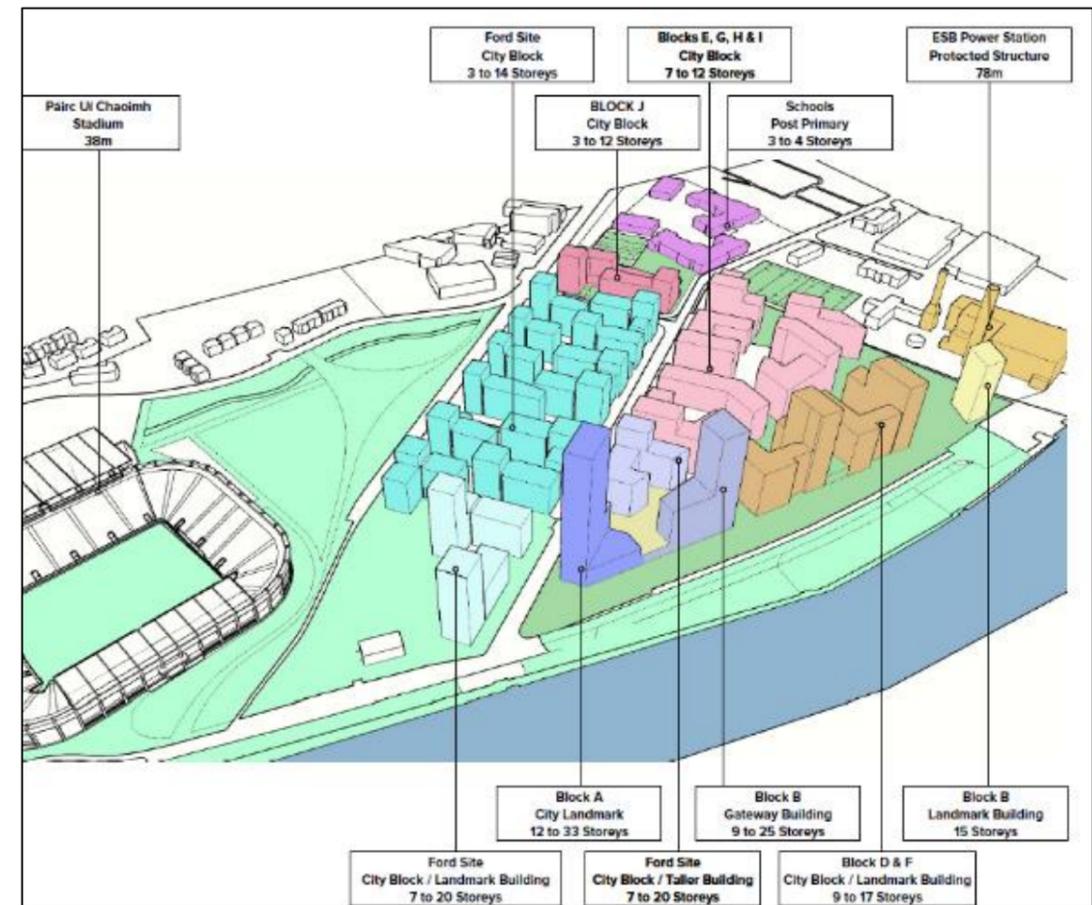
Despite the progressive approach to the redevelopment of the South Docklands in achieving increased densities and the sought after radical transformation of the primarily industrial lands the Draft Plan needlessly directs that *“As with the North Docks and the City Centre, riverside development should step down, to a maximum height of 6 storeys”*. It is our opinion that the restriction on height to a maximum height of 6 no. storeys along the riverside in the South Docklands is unwarranted and will ultimately impact on the delivery of high density development.

The potential of the South Docklands will be significantly undermined if the height of riverside development is a maximum of 6 no. storeys.

The restriction will also impact the delivery of landmark and gateway buildings of notable heights given that appropriate architectural step downs in height will need to be provided.

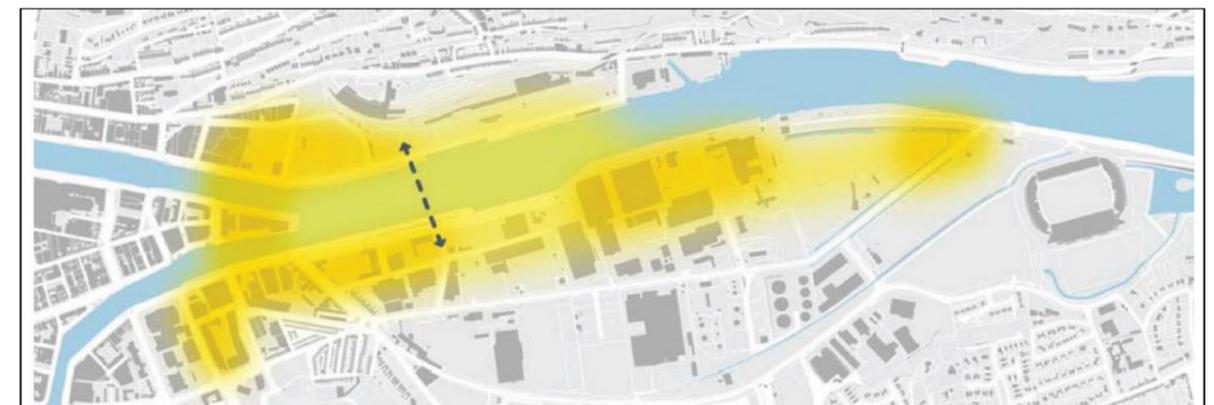
For reference we include extracts from the accompanying C+W O'Brien Architects document illustrating the wider context and indicative stepped heights along the river that range from 7 to 33 no. storeys.

Figure 2.4 Extract from the Proposed Masterplan



Also, we highlight that the *“City Docks Zones Appropriate for Tall Building”* diagram provided for in the Draft Plan which further demonstrates that the vision for heights in the South Docklands is too restrictive, with obvious but unwarranted areas where riverside development will be undoubtedly discouraged.

Figure 2.5 City Docks Zones Appropriate for Tall Buildings (Draft Cork City Development Plan 2022 -2028)



Further we also submit that the Cork City Urban Density, Building Height and Tall Building Study (CCUDBHTBS) is contradictory in encouraging “*taller buildings*” in the South Docklands which is characterised by its proximity to the River Lee but yet stipulating that a maximum height of 6 no. storeys should be provided at the river’s edge.

Of relevance in this regard, we refer to both the NPF and the Section 28 Guidelines ‘Urban Development & Building Heights’, in particular section 2 ‘Building Height and the Development Plan’. Key extracts are highlighted:

National Planning Framework

- Objective 13: *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. **These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.**”*

Urban Development & Building Heights

- Para 2.1: *“Implementation of the National Planning Framework requires increased density, scale and height of development in our town and city cores, including an appropriate mix of both the living, working, social and recreational space we need in our urban areas.”*
- Para 2.3: *“While achieving higher density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability. Accordingly, the development plan must include the positive disposition towards appropriate assessment criteria that will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development.”*
- Para 2.4: *“In order to optimise the effectiveness of this investment in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure, **development plans must actively plan for and bring about increased density and height of development within the footprint of our developing sustainable mobility corridors and networks.**”*

As the Planning Authority will note there is a requirement for these national objectives to be facilitated at a local level through the plan process.

In the context of (i) the section 28 guidelines re building heights; (ii) the recently published CCUDBHTBS and (iii) in consultation with globally accredited Urban Strategies appointed by our client we submit that the reference to a maximum of 6 no. storeys along the river’s edge should be omitted in the next phase of the Development Plan process and that the target height range should not have a maximum value.

The height of any future redevelopment should be reliant on site specific assessments having regard to technical considerations and addressed at development management stage.

To further demonstrate our assessment C+W O’Brien Architects have prepared a Masterplan document for our client’s lands which demonstrates that the South Docks riverside has the ability to absorb heights greater than 6 no. storeys. For reference the extract below illustrates how increased heights can be introduced into the skyline along the banks of the River Lee.

Figure 2.6 Extract from C+W O'Brien Architects Height Study

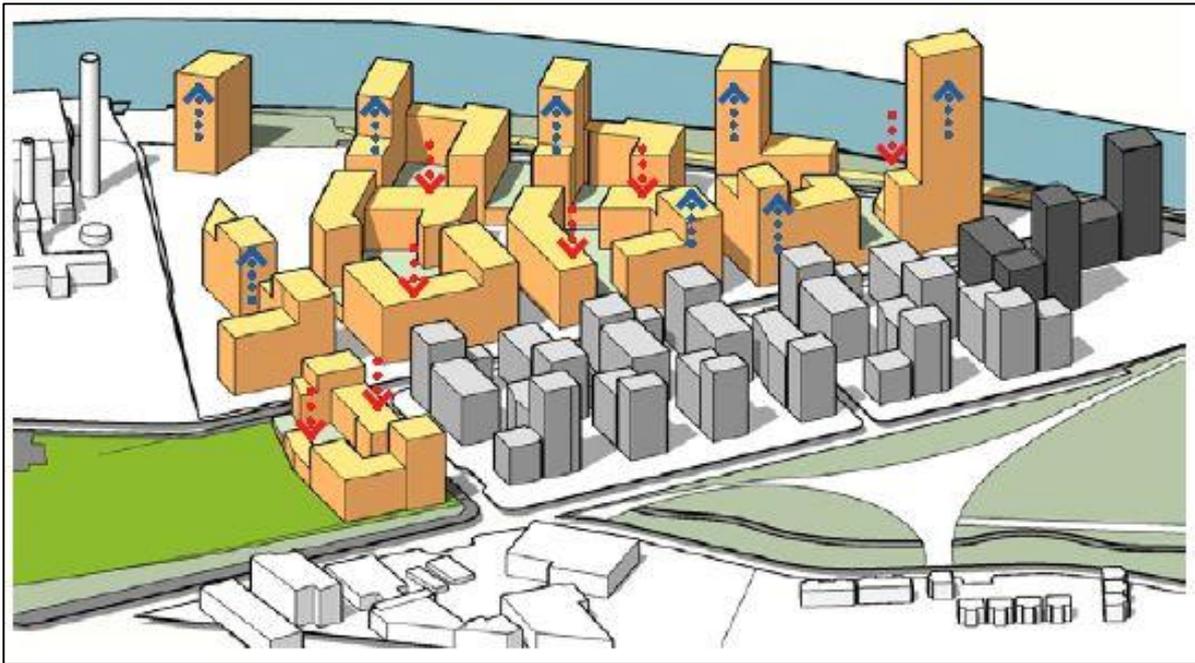


Figure 2.7 Extract from C+W O'Brien Architects Height Study



In summary we submit that by providing a minimum target for heights higher density developments will be encouraged and better achieved without limiting the potential for appropriate architectural responses for heights greater than the 6 no. storeys in the receiving environment of each site specific building.

03. Request

We welcome the opportunity to make this submission to the Stage 2 Public Consultation Draft City Development Plan 2022-2028.

As outlined in this submission we consider that the future adoption of the Cork City Development represents a significant opportunity for the delivery of a new urban quarter in the South Docklands

This document has established that guidance on maximum target heights have the potential to severely impact on the delivery of appropriate densities in the South Docklands.

We highlight our client is in the process of preparing a planning application for delivery of a scheme on the lands. With the project design team being advised by globally accredited Urban Strategies, we submit that the reference to a maximum of 6 no. storeys along the river's edge should be omitted in the next phase of the Development Plan process and that the target height range should not have a maximum value.

In the context of the NPF, the Section 28 Guidelines "*Urban Development and Building Height Guidelines*", the recently published Cork City Urban Density, Building Height and Tall Building Study and the emerging pattern of development in the area for increased heights we submit that the height of any future development should be fully reliant on site specific assessments having regard to technical considerations.

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