

Cork City Council  
Development Plan Submissions,  
Strategic & Economic Development,  
City Hall,  
Anglesea Street,  
Cork.  
T12 T997

September 27<sup>th</sup> 2021

**Re: Proposed Cork City Draft Development Plan- Southern Milling Ltd, Marina Walk, Cork**

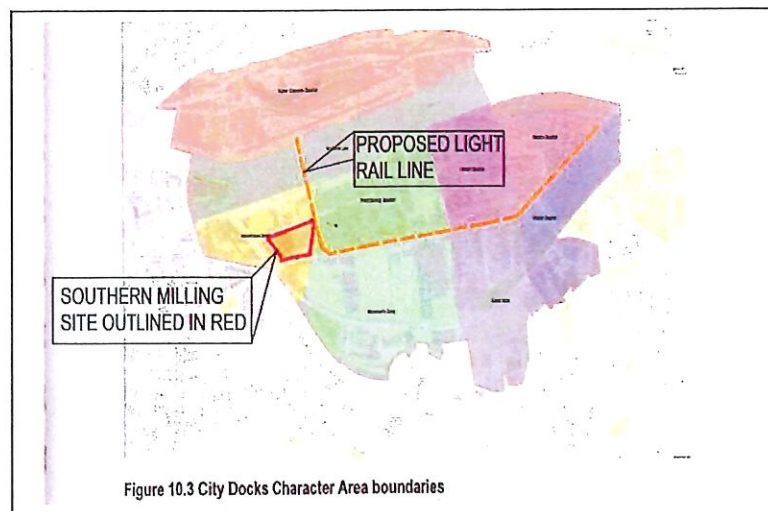
Dear Sir/Madam,

We wish to make a submission to the Draft Plan Process on behalf of Southern Milling Ltd. Marina Walk, Cork.

Southern Milling Ltd. are quite happy with the general context of the Draft Plan and with the objectives of the core strategy to develop the City Docks for high quality, high density, mixed use sustainable waterfront areas and with the stated fact that this core strategy takes precedence over any contrary indications in chapter 10 or any other chapter.

However, we are worried that there are some, perhaps unintentional, contrary indications in chapter 10 which may need to be clarified.

We attach site map of our clients' property in the context of the Draft Plan.



The basis of our submission is as follows:

## **1. Warehouse Quarter, Indicative Floor Area, 75,000m<sup>2</sup>**

The Developments of OCP and Carey's which lie in Warehouse Quarter (**West**), already total circa 59,454 sq. meters. The remainder of the Warehouse Quarter Indicative Floor Area of 75,000m<sup>2</sup> would be approx. 15,546 sq. meters.

This remaining area of the Warehouse Quarter is designated in Chapter 11 for high density, mixed use and as the potential location for "Exceptional Tall Buildings". It is also the location for a district / neighbourhood centre which abuts light rail & transport modes.

The implied remaining Indicative Floor Area for Warehouse Quarter (**East**) makes no sense in the context of the stated objectives for the development of the South City Dock area. This contradiction should be amended in the final plan so as to leave no doubt as to the determination to achieve the objectives of the Core Strategy.

See Appendix (1) – Indicative remaining floor area

## **2. Plot Ratio**

We can see no reason to apply any plot ratio control to the development of the Warehouse Quarter (East). Setting it at 2.25 will seriously militate against the achievement of the objectives set out in the Core Strategy and in Chapter 11, in relation to density and "exceptional tall buildings".

We would point out that permitted and under construction development within the Warehouse Quarter has plot ratios of 5.6 (OCP) +6.08 (Carey's /Cleary).

Appendix (2) below indicates the potential result of the application of these restrictive ratios to our client's site and, indeed, on the remaining properties within Warehouse Quarter East)

It is submitted that the suggested plot ratio makes no sense whatsoever in the context of achieving the stated objective for this Quarter of South Docklands, or, indeed for any areas covered by the concept of suitability for high buildings, and would, if applied, also seriously militate against any possibility of achieving a development in accordance with the core strategy.

It is respectfully suggested that no plot ratio control whatsoever should be applied to the strategically vital areas of North and South Docks nor to the "Tip of the Island"

Such arbitrary control seems extremely crude and of no rational basis, nor would it conceivably benefit or aid the achievement of the City's objectives for these areas.

We believe that the column "**Indicative Plot Ratio/Floor Area Ratio (FAR)**" should be removed in its entirety from Table 10.3. It serves no purpose other than to restrict innovative design and place making solutions.

If it is to remain then, to avoid any doubt or "contrary indications", the second sentence of Par. 10.68 should be amended as suggested in Appendix (3) Suggested amendment to Par. 10.68 below.

### 3. Nature of Existing Enterprise

In the particular circumstances of our client's undertaking, we would refer you to ours of Aug. 19<sup>th</sup> 2020 which sets out the need for flexibility in the application of controls so as to ensure the medium-term achievement of the City's objectives for this critical and strategic location.

The interpretation arising from the Plot Ratio control figures and Indicative Floor Areas would ensure that a desired relocation of a conflicting/non-conforming land use from a strategically important site would be commercially and economically unviable and impossible – all to the detriment of the best interests of the proper planning and sustainable development and redevelopment of the South City (Warehouse Quarter) Dockland.

See appendix (4) below

Yours faithfully,



Tony Dunlea B.Eng C. Eng MIEI  
Murphy McCarthy Consulting Engineers Ltd

217120

**APPENDIX 1**

**Appendix (1) Indicative remaining floor area, Warehouse Quarter.**

Area of Warehouse quarter	67,200 sq. m
Allocated Indicative Floor Area in Quarter	75,000 sq. m
Floor area already permitted in Warehouse Quarter (West)	59,454 sq. m
Indicative remaining floor area	15,546 sq. m
Area of Warehouse Quarter (East)	46,800 sq. m
Area of Southern Milling Site	12,790 sq. m
Southern Milling Site as % of Warehouse Quarter (East)	27%
Pro rata allocation of remaining Indicative Floor Area to Southern Milling site	4,197sq.m
Resulting Plot Ratio for Southern Milling Site	0.33 to 1

**APPENDIX 2**

## Appendix (2) Application of Plot Ratios

In relation to the strategically located Southern Milling site, which is occupied by a land use which would be considered non-conforming in the context of docklands redevelopment and which previous plans acknowledged needed to be relocated, the following is the position:

Area of Site	12,790 sq. m
Plot Ratio	2.25 to 1
Allowable floor area	28,797 sq. m
If a high building (say 25 storeys) is proposed at the north east of the site where the light rail and district/neighbourhood centre is proposed then each floor is limited by allowable plot ratio to	
	1,151 sq. m
Resulting Site Coverage	9.0%
Resulting undeveloped site area	91.0%

**APPENDIX 3**



### **Appendix (3) Suggested amendment to Par 10.68, second sentence**

*“With reference to Tables 10.3 and 10.4 these density, indicative floor space capacities, plot ratios/FARS and heights are general targets only and there will be justification to deviate from these general targets where it can be demonstrated that it is in the interests of good place-making and design principles and in the interests of the achievement of the tall building locational strategy set out in chapter 11 below. In particular, where an “Exceptional Tall Building” is proposed and considered acceptable on design and place-making grounds, plot ratios as set out in Table 10.3 are not to be seen as applicable or mandatory.”*

**APPENDIX 4**



# Murphy McCarthy Consulting Engineering Ltd.

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Cork City Council  
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Strategic & Economic Development,  
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Anglesea Street,  
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T12 T997

August 19<sup>TH</sup> 2020

Re: Proposed Cork City Development Plan- Southern Milling Ltd, Marina Walk, Cork

Dear Sir/Madam,

We act on behalf of Southern Milling Ltd. Marina Walk, Cork.

The existing Animal Feed Facility is one of the largest in the country and is of significant strategic importance to the national agricultural sector.

We wish to make a point regarding this and similar industrial enterprises located in docklands, the redevelopment of which is a specific objective of the City Council.

These areas are already zoned for development so this submission does not constitute a request for zoning/rezoning as prohibited at this stage of the review process.

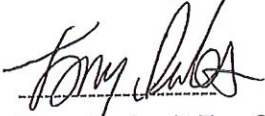
We note that the proposed uses under the Cork Docklands Development Plan are non-compatible with the current industrial uses in the area.

The City will be aware that there is a major difference between storage/warehousing/distribution undertakings and those which involve industrial processing and substantial capital equipment investment, such as Southern Milling. It will be necessary, therefore, to ensure that the substantial costs of relocation, site acquisition, rebuilding, replacement of capital equipment etc. would be justified by the planning yield which would arise from the redevelopment of such industrial processing sites. The City, in fairness, has already acknowledged this problem in its Docklands studies and reports.

In the light of present circumstances regarding uncertainty regarding future office and other market trends, therefore, this submission to the review process simply asks that the Planning Authority should not be overly prescriptive in terms of detailed site-specific objectives but should consider that any mixture of residential/office/enterprise/business use is acceptable and that there should be no predetermined maximum figures set for plot ratios or building heights.

My clients would request a meeting to discuss these issues with officers of the Planning Authority to assist in formulating the new development plan.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tony Dunlea', written over a horizontal dashed line.

Tony Dunlea B.Eng C. Eng MIEI  
Murphy McCarthy Consulting Engineers Ltd

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