

Submission to Draft Cork City Development Plan 2022-2028

For Development at Douglas, Cork

on behalf of O'Flynn Construction Co. Unlimited Co. (OFC)

October 2021



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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of O'Flynn Construction Co. Unlimited Company (OFC), in response to public notices inviting submissions from third parties and interested parties on the Cork City Development Plan review in accordance with section 11(2)(bc) of the Planning and Development Act 2000. Our client welcomes the publication of the Draft Cork City Development Plan 2022-2028 and the opportunity to participate in the plan making process which will inform the future development of Cork City.

This submission requests the following amendments relating to lands at Douglas:

- **Re-instate the 'ZO 07 Urban Town Centre' zoning on our clients' site to the east of Douglas Court Shopping Centre.**

This submission is structured as follows:

- Site Context
- Planning Policy
- Rationale for Submission Request:
- Conclusion

2. Context

Our clients' lands are located in Douglas, east of Douglas Court Shopping Centre and lies within the area defined as Douglas Village in the Ballincollig-Carrigaline Municipal District Local Area Plan.

Access to our client's site can be achieved via the Douglas Court Shopping Centre access off the R610 or via Belgard Downs estate located to the south of the site. The site is located within close proximity to the N40 National route. Douglas is located c. 4km from Cork City Centre with the 220-bus service operating at a high frequency. Douglas Village serves a significant population base with large residential areas surrounding the urban centre.

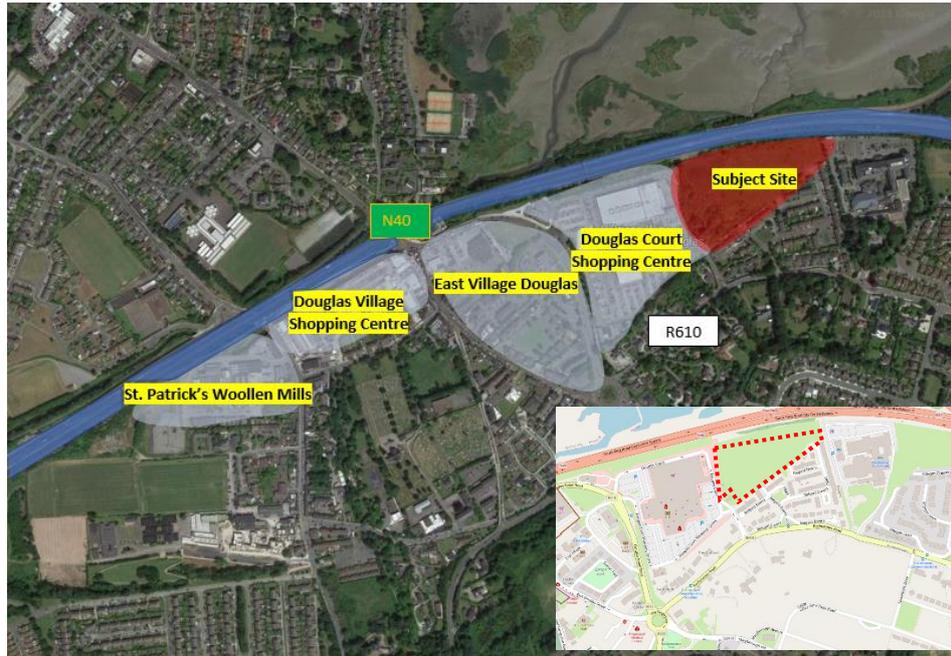
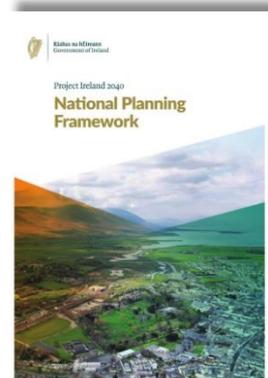


Figure 1: Site Context – indicative location of Site shaded in red and red dashed lin in map inset

3. Planning Policy Context

3.1 Project Ireland 2040 – National Planning Framework (NPF)

In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027. These plans aim to achieve balanced regional development by outlining a clear hierarchy for the urban centres outside the greater Dublin area, with Cork being promoted as the State's second city, fulfilling a nationally important role in counterbalancing the Capital.



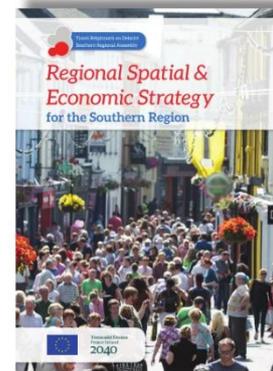
The NPF notes that the employment growth in Ireland is subject to our capacity to accommodate it. The NPF promotes the increase in population growth whilst also seeking to improve urban infrastructure and amenities, enterprise opportunities and the built environment. This will ensure that we can continue to provide an attractive range of enterprise development opportunities in the face of changing employment activities and sectors.

National Policy Objective 10a states that "Regional and Local Authorities are to *identify locations for strategic employment development in the cities identified in Table 4.1*" which include Cork City's suburbs.

The NPF further notes that is a core strategy to reverse town and village and rural population decline by encouraging new roles and functions for buildings, streets and sites.

3.2 Regional Spatial & Economic Strategy for the Southern Region (RSES)

RSES is a strategic document, which identifies high-level requirements and policies for the Southern Region, setting out the high-level statutory framework to empower each local authority to develop CCDPs, Local Area Plans (LAPs) and LECPs that are coordinated with regional and national objectives.



The RSES identifies Cork City as a national primary driver and an engine of economic and population growth. The sustainable growth of Corks requires strengthened regional connectivity to enhance the integration for the Cork Metropolitan area with the Atlantic Economic corridor. This will regenerate and develop Cork as a smart city and metropolitan area, enhance high quality environment, vibrant city centre, compact suburbs and metropolitan towns.

The RSES notes that Cork Metropolitan area is a priority location for retail services within the region and that it is important that future provision of retail affirms the hierarchy of retail locations. MASP Objective 16 **defines Douglas as a Level 2 District Centre** retail area similar to Blackpool, Wilton and Mahon Point.

3.3 Cork County Development Plan 2014

Our clients lands in Douglas are located within the South Environs of Cork City. Objective 3-1 of the Cork County Development Plan (CDP) 2014 states that the strategic aim of the City Environs (North and South) is to:

"... Growth in population and employment so that the Cork Gateway can compete effectively for investment and jobs. Develop to complement & consolidate the development of the city as a whole and providing enhanced potential to rebalance the City through new development in the north."

Objective CS 4-1 of the 2014 County Development Plan sets out the key objectives for the Cork Gateway, which includes the following:

"CS 4-1 a) Recognise the importance of the role to be played by Metropolitan Cork in the development of the Cork 'Gateway' as a key part of the Atlantic Gateways Initiative and, in tandem with the development of Cork

City, to promote its development as an integrated planning unit to function as a single market area for homes and jobs where there is equality of access for all, through an integrated transport system, to the educational and cultural facilities worthy of a modern and vibrant European City,”

3.4 Ballincollig Carrigaline Municipal District Local Area Plan 2017

In the 2017 Ballincollig – Carrigaline Municipal District Local Area Plan (LAP), the site in Douglas forms part of the southern suburbs of Cork City. The 2017 LAP states that the strategic aim of the South Environs is the:

“...consolidation of the southern suburbs within the existing development boundary. The promotion of the suburban centres as important locations for residential, community and recreational facilities. Ensure the clear demarcation of the inner metropolitan greenbelt. Finally, support appropriate proposals for urban regeneration initiatives in Douglas and elsewhere in the Environs”

As can be seen from Figure 2 below, the site is located within an area zoned as ‘Town Centre’ in the Local Area Plan, where the following policy objective applies:

“It is recommended that an Overall Planning or Development Scheme be prepared for the entire site and which can be implemented on a phased basis. This shall include comprehensive proposals for a mixed-use development which caters for a variety of town centre type uses including offices, retail (including urban format retail warehousing in a mixed-use building), retail services and some residential.

The redevelopment of the site should only result in an increase of 25% to the floorspace to the footprint of the existing buildings. If the developer wishes to increase this density of development, they will have to prove that there will be no negative net impact to the proposed improvements to the existing transport network.

The site can cater for an additional 70 dwellings. If the developer wishes to increase this density of development they will have to prove that there will be no negative net impact to the proposed improvements to the existing transport network.

The redevelopment of the site shall create linked pedestrian routes which will provide safe permeability and

connectivity and which shall follow the preferred desire lines to the existing village.

Traffic calming management to reduce the severance effect from the Woollen Mills to the Douglas Village Shopping Centre including additional crossing points.

Car parking for new development should follow the revised car parking standards of the County Development Plan.

The existing historic buildings will be protected and where possible enhanced.”

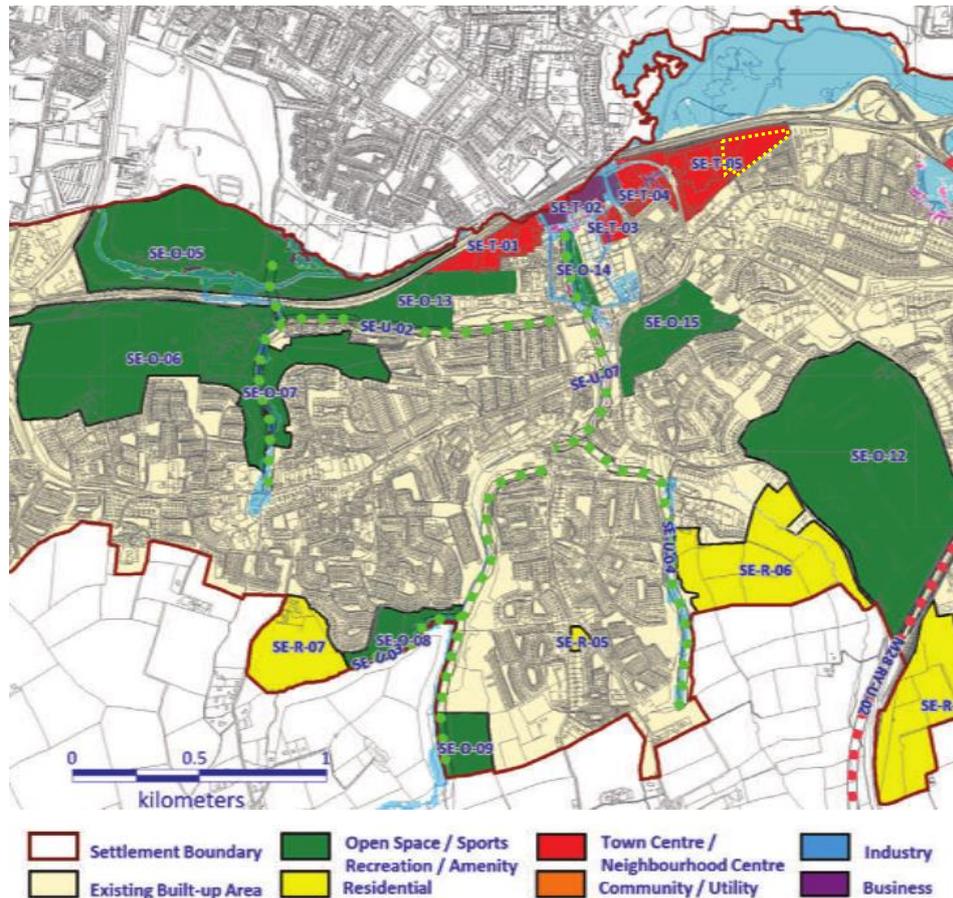


Figure 2: Extract from 2017 LAP - Site dashed yellow line.

Section 3.5.38 of the LAP recognises the South Environs as an important district centre for shopping, employment and leisure. The plan further notes in Section 3.5.51 that the Douglas and Rochestown area should be the primary focus location for employment and economic activity and promote the mixed-use development and regeneration of brownfield sites.

In relation to town centre and retailing, the plan outlines the following:

- Douglas contains the highest provision of retail and service facilities in the South Environs;

- Douglas is an important employment and retail district;
- The Cork Metropolitan Joint Retail Strategy identified Douglas as a **District Centre**;
- The Douglas Land Use and Transportation Study envisaged Douglas continuing to develop as a mixed-use centre extending its range of comparison shopping;
- Future employment and economic activity in the Douglas/Rochestown area should be centred on Douglas Village.

3.5 Metropolitan Cork Joint Retail Strategy

In the Joint Retail Strategy for Metropolitan Cork (JRSMC), Douglas is identified as a District Centre:

“The overall strategy for the District Centres, which includes Blackpool, Douglas, Wilton, Mahon and a proposed new centre at Ballyvolane, is to provide for the ‘development of mixed-use urban centres to include retail, with urban design and access improvements.”

The JRSMC states that overall the District Centre performs well, especially in relation to convenience retail, but could improve in relation to comparison retail:

“Douglas performs well in terms of its role as a District Centre particularly in terms of convenience shopping. It is noted however, that it does not perform as well as other centres in terms of comparison shopping and ranks below Mahon and Wilton in this regard. The centre also has notable rates of vacancy. The retailing needs of the catchment population are well provided for in terms of both convenience and comparison retailing by way of the two shopping centres, Douglas Village Shopping Centre, which integrates well with the traditional village centre of Douglas, and Douglas Court Shopping Centre.”

3.6 Cork Metropolitan Area Transport Strategy

The Cork Metropolitan Area Transport Strategy (CMATS) aims to deliver an integrated transport network that addresses the needs of all modes of transport, offering better transport choices, resulting in better overall network performance and providing capacity to meet travel demand and support economic growth. CMATS is a significant investment package allocated for the Cork Metropolitan Area to include commuter rail, bus corridors, light rail, park and rides, walking and cycling infrastructure and road networks.

Key outcomes and transport investments for Douglas include:

1. Provide a strong east-west link from Mahon to both the City Centre and Douglas via the Boreenmanna Road and Well Road respectively;
2. Provide missing footpaths along Douglas Road to support access to substantially increased public transport frequencies;
3. To support existing public transport provision and potential windfall sites at South Douglas Road;
4. Improve Douglas Road as a key Primary Cycle Route in the Cork Metropolitan Area;
5. Improve Evergreen Street/Abbey Street/ Douglas Street as a Secondary Cycle Network
6. Improve a route following the Tramore River including Douglas, Tramore Valley Park and Togher at a Greenway Cycle Network;
7. A Core Radial Bus Service, which will form part of the wider city BusConnects Network connects the external corridors to the City Centre. This supporting service will include a new bus service going via Carrigaline to Cork City as well benefiting from higher frequency on the existing Ringaskiddy-MonkstownDouglas-City route;
8. Serving the Douglas Road corridor by a bus approximately every 3 minutes in the peak travel periods; and
9. The provision of a Southern Distributor Road to alleviate congestion at several pinch-points including Douglas Village and the Kinsale Road Roundabout. The Southern Distributor Road will provide dedicated walking and cycling infrastructure and support planned residential development in the South Environs area

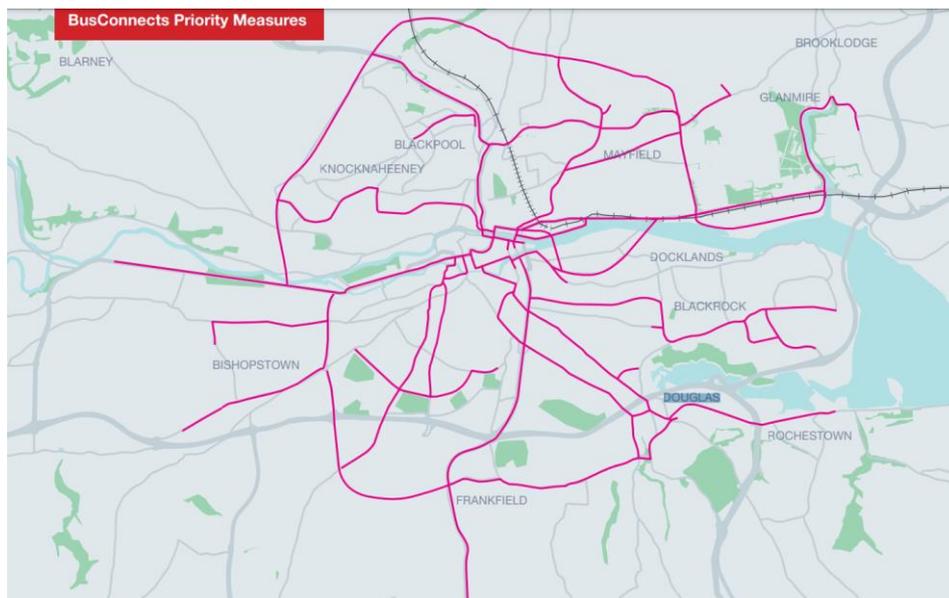


Figure 3: Extract from Cork Metropolitan Area Transport Strategy

3.7 Cork Cycle

There is a need to address the national targets for sustainable transport as set out in *Cork Cycle Network Plan*. The objective for this document is to provide a clear plan for the future development of the cycling network within

the Metropolitan Area to encourage greater use of cycling for trips to work, school, recreation and leisure.

Some of the Key priorities of the Cycle Network Plan are:

- Designating a coherent network of east-west and north south cycle routes across the Cork Metropolitan area which will provide access to all major trip generators;
- Enhanced connections to the Douglas area;
- At Douglas Road outbound it is proposed to upgrade existing cycle lanes and provide clearly defined mixed street sections where the road width cannot be provided for dedicated facilities. This route will provide a key link to Douglas from the City Centre and serve a number of schools
- One of the main routes proposed in Cork City South East is at Douglas Road outbound. It is proposed to upgrade existing cycle lanes and provide clearly defined mixed street sections where the road width cannot be provided for dedicated facilities. This route will provide a key link to Douglas from the City Centre and serve a number of schools.

Our client's lands are strategically well placed to encourage the use of sustainable development as the site lies within the catchment of a number of primary cycle routes (refer to Figure 4) with a focus on cycling facilities in the Douglas area.

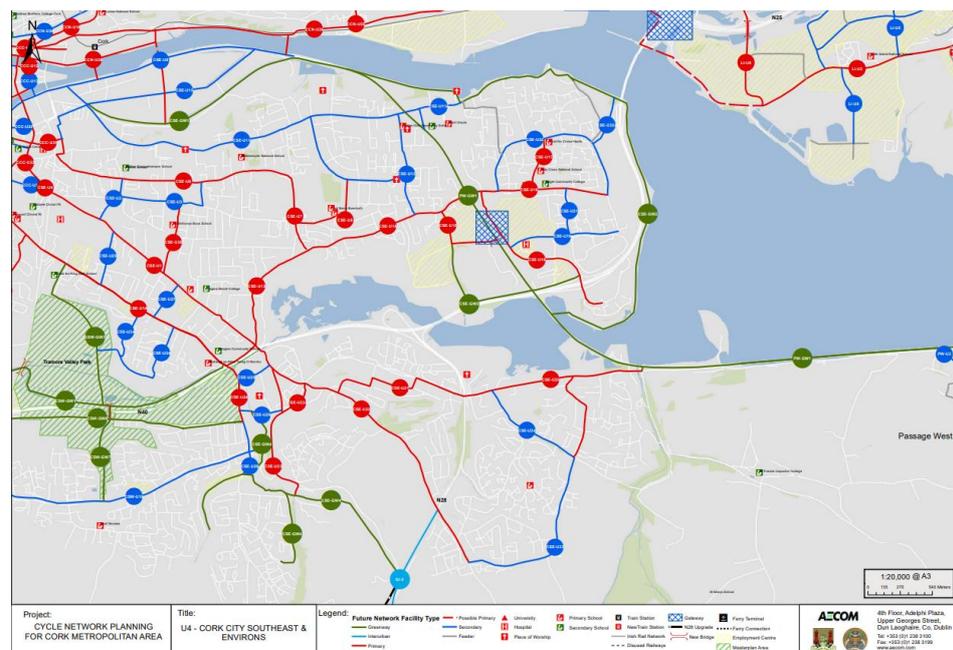


Figure 4: Extract from Cork City Cycle Plan 2017

3.8 Draft Cork City Development Plan 2022

In the Cork City Draft Development Plan 2022, the commercial core of Douglas is zoned 'ZO 7 Urban Town Centre' where it is an objective to *"consolidate and provide for the development and enhancement of urban town centres as primary locations for mixed use retail, economic and residential growth which also act as a focus for a range of services."*

In the draft CDP our clients' site is proposed to be rezoned from Town Centre use to Public Open Space under ZO 16 where it is an objective to *"protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas and amenity facilities."*

The primary purpose of this zone is to preserve all land in this zone for open spaces and amenity use.

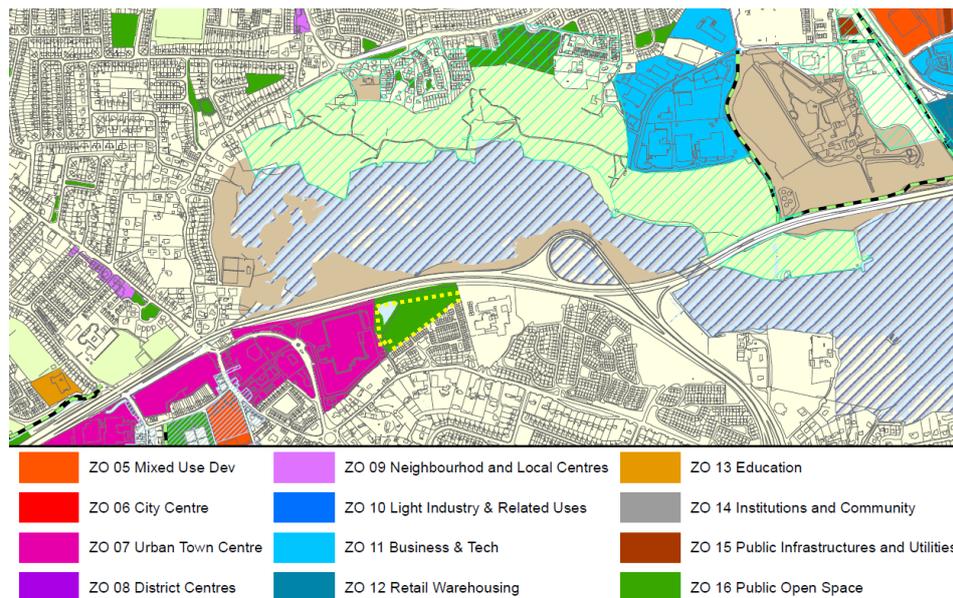


Figure 5: Extract from Cork City Draft Plan 2022 – site outlined in yellow

4. Rationale for Submission Request

The purpose of this submission is to re-instate the commercial/town centre zoning on our clients' site to the east of Douglas Court Shopping Centre.

Douglas is an important district centre for shopping, employment and leisure in the South Environs of the City and should be the primary focus location for employment and economic activity in the forthcoming CDP. The CDP also needs to promote the mixed-use development and regeneration of infill/brownfield sites within Douglas.

The draft CDP proposal to reduce the area of the town centre for Douglas runs against the strategic objectives for the area which recognises that:

- Douglas contains the highest provision of retail and service facilities in the South Environs;
- Douglas is an important employment and retail district;
- The Cork Metropolitan Joint Retail Strategy identified Douglas as a District Centre;
- The Douglas Land Use and Transportation Study envisaged Douglas continuing to develop as a mixed-use centre extending its range of comparison shopping;
- Future employment and economic activity in the Douglas/Rochestown area should be centred on Douglas Village.

In the Joint Retail Strategy for Metropolitan Cork, Douglas is identified as a District Centre which needs to expand and improve in relation to convenience and comparison retail.

In the 2017 LAP our clients site formed and integral part of the "Town Centre" zoning in Douglas as it was considered as a logical and sequential extension to the existing town centre area and had the capacity to provide mixed-use development such as offices, retail (including urban format retail warehousing in a mixed-use building), retail services and some residential.

The redevelopment of the site can create linked pedestrian and cycle routes which will provide safe permeability and connectivity and which shall follow the preferred desire lines to the existing Douglas village from the commercial/residential areas to the east.

From a land use and transportation perspective it does not make sense to rezone our clients lands from Town Centre use to ZO 16 Public Open Space where it is an objective to "*protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas and amenity facilities.*"

Our clients lands is the only location where the existing town centre at Douglas can expand in to. Given the level of transport and infrastructural investment earmarked for Douglas over the next 2 years or so, it makes no sense that the only major site to allow the expansion of the town centre be rezoned for open space use and we would strongly urge the City Council to reconsider the proposed open space zoning on our clients site.

5. Summary

This submission requests the following amendments relating to lands (outlined in yellow) at Douglas:

- **Re-instate the 'ZO 07 Urban Town Centre' zoning on our clients' site to the east of Douglas Court Shopping Centre.**

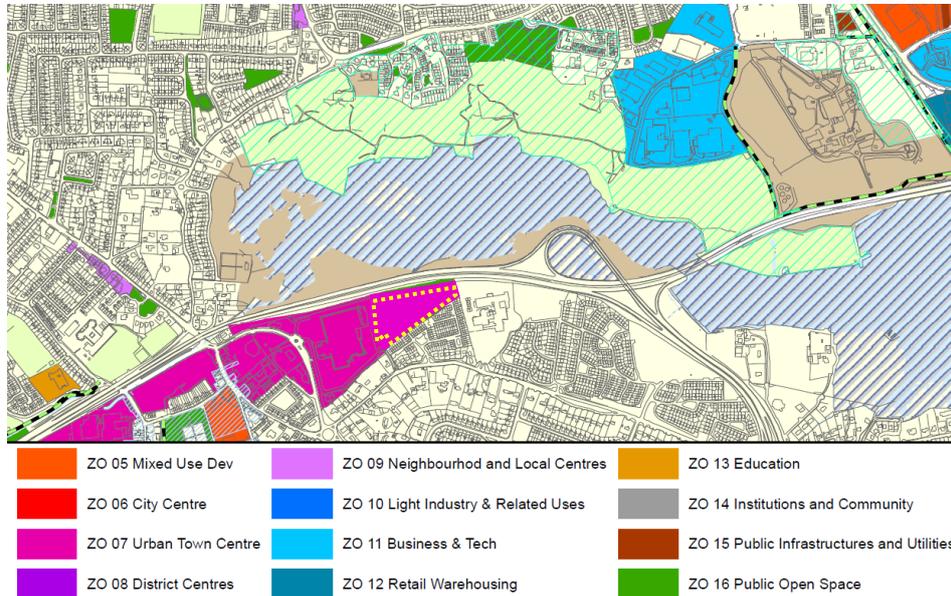


Figure 6: Proposed ZO 07 'Urban Town Centre' zoning outlined in yellow

On behalf of our clients, we would be grateful if this submission could be given careful consideration during the preparation of the Cork City Development Plan 2022-2028.

Please do not hesitate to contact us if you have any queries.

Yours sincerely,

Tom Halley

McCutcheon Halley