

## **Submission to Draft Cork City Development Plan 2022-2028**

Proposed Neighbourhood Centre

on behalf of Melbourne Management Company Ltd.

**October 2021**



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## Document Control Sheet

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# 1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Melbourne Management Company Limited (MMC), in response to public notices inviting submissions. 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 in relation to our clients lands at Melbourne Business Park, Model Farm Road:

- **Rezone Melbourne Business Park from Light Industrial to 'ZO 09 Neighbourhood and Local Centre'.**

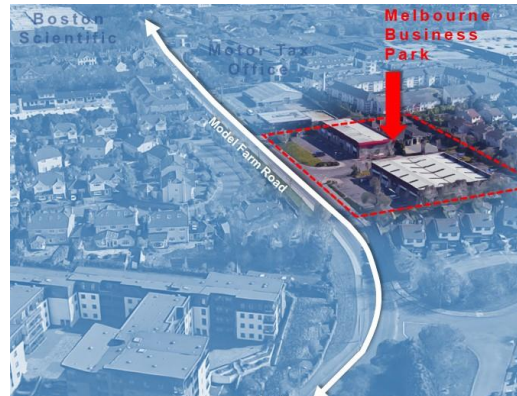
This submission is structured as follows:

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



# 2. Context

Melbourne Business Park is located within the Western suburbs of Cork City which benefit from an easy access to the City Centre and the proximity to some of Cork's main employers such as Cork Institute of Technology, Cork University Hospital and University College Cork. Our client's lands consist of two adjacent commercial sites comprising approximately 0.7 Hectares.

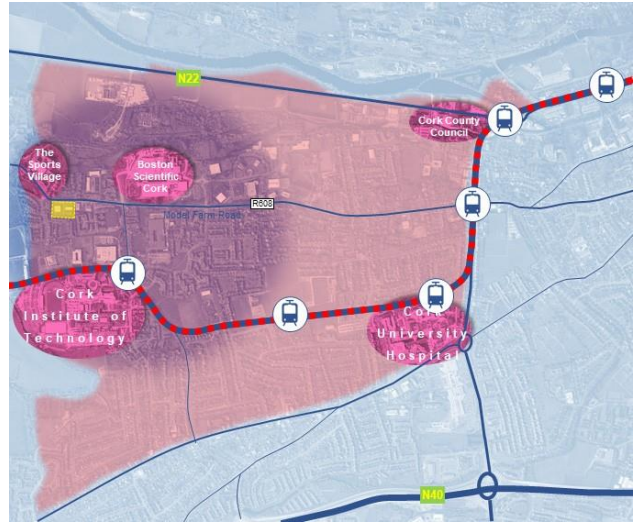


There is a very significant and growing catchment population in this part of Bishopstown as demonstrated in the table below:

ED Name	ED ID	Total Population 2006	Total Population 2011	Total Population 2016
Bishopstown A	17006	1694	1326	2223
Bishopstown B	17007	2116	1950	1934
Bishopstown C	17008	4988	4726	4925
<b>TOTAL</b>		<b>8798</b>	<b>8002</b>	<b>9082</b>
<b>Change</b>			<b>-9.1%</b>	<b>+13.5%</b>

Table 1: Catchment Population

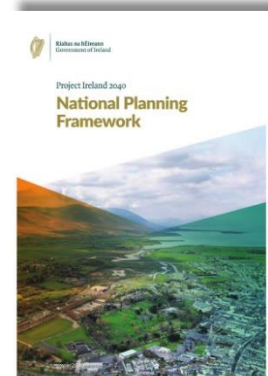
The subject lands are located on the western side of Cork City, approximately 4km from the city centre. The site (marked yellow) is also easily accessed from Ballincollig via Model Farm Road which is a dedicated high frequency and 24 hour BusConnects route and is also located within very close proximity to the proposed Light Rail Corridor. The site can be accessed within a 5min walk from the proposed stop at CIT.



## 3. Planning Policy Context

### 3.1 Project Ireland 2040 – National Planning Framework (NPF)

Project Ireland 2040 was published by the Government of Ireland in February 2018 with the objective to provide details for the new national planning and capital expenditure plans. 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.



'Strategic Objective 1' of the NPF relates to Compact Growth:

*"Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority."*

The need for planned and sustainable growth with access to services is a major tenet of the NPF:

*"There is a need to address the legacy of rapid unplanned growth in expanded commuter settlements of all sizes, by facilitating amenities and services, jobs growth and/or improved sustainable transport links to the cities, together with a much slower, more sustainable rate of population growth than in recent decades."*



### 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 Development Plans and Local Area Plans.

The RSES states that the sustainable growth of Metropolitan Cork requires consolidation, regeneration, infrastructure led growth and investment in each of the following locations: city centre (including the Docklands and Tivoli), potential light rail transit (LRT) corridor, strategic bus network corridor and suburban area nodal points and corridors along the Ballincollig to Mahon LRT line, district centres, north and south environs, Glanmire, city and suburban area expansion (sustainable and infrastructure led).

### 3.3 Retail Planning Guidelines

The Retail Planning Guidelines for Planning Authorities issued in 2012 identifies a number of key criteria which need to be assessed when undertaking the appropriateness of new retail developments (commonly known as the sequential test):

*"In adopting the sequential approach in formulating development plans planning authorities must liaise with retailers, landowners and developers to ensure that development plan proposals are practicable and reasonable... Sites suggested for development should therefore be capable of being accessed and serviced. They should be viable for the proposed use and likely to become available within a reasonable period of time."*

### 3.4 Metropolitan Cork Joint Retail Strategy (MCJRS)

The MCJRS prepared jointly by Cork City and County Council is based on the following Retail Hierarchy for Metropolitan Cork:

Level 1 Cork City Centre

Level 2 District Centres

Level 3 Small Metropolitan Towns

**Level 4 Neighbourhood centres**

**Level 5 Local centres, corner shops**

The MCJRS defines **Neighbourhood Centres** as centres that provide important top-up and day-to-day shopping and retail service requirements and play an important role in serving the needs of those without access to a car, particularly the elderly. They are typically characterised by small scale convenience offer and ancillary retail services (typical uses include a newsagent, supermarket, grocery store, sub-post office) and serve a small, localised catchment population. They normally serve a pedestrian catchment

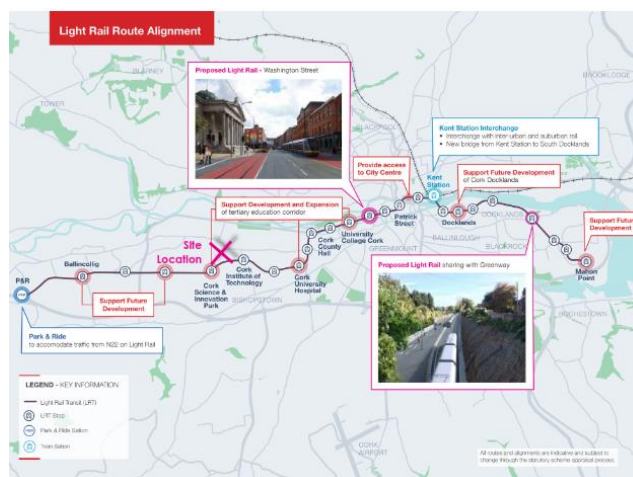
of approximately 800m and new centres will generally be anchored by a small/medium sized convenience store.

The MCJRS also states that **Local Centres** provide a valuable local and walk in role and function to the local communities that they serve. They generally have a pedestrian catchment of approximately 400m.

### 3.5 Cork Metropolitan Area – Transport Strategy 2040 (CMATS)

The 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.

A major component of CMATS is a proposed BRT/LRT between Mahon and Ballincollig via Model Farm Road. The location of Melbourne Business Park is identified with an "X" above within the context of this corridor.



### 3.6 Draft Cork City Development Plan 2022

One of the core objectives of the draft CDP is to provide a compact city with walkable neighbourhoods based around 15-minute catchments:

*"SO 1: Compact Liveable Growth: Deliver compact growth that achieves a sustainable 15-minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city."*

Section ZO 9.1 of the draft states that 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**.

In the draft CDP, on sites zoned ZO 9 Neighbourhood and Local Centres it is an objective *"to protect, provide for or improve local facilities."* The draft also states that 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.

In the Cork City Draft Development Plan 2022 the site is proposed to be zoned 'ZO 10 Light Industry and Related Uses' where it is an objective to *"to provide for light industry and related uses."*

The primary purpose of this zoning objective is to provide for and protect dynamic light industry and manufacturing employment areas. Primary uses in this zone where the primary activity is the manufacturing of a physical product and which activity is compatible with being located near to residential areas. Primary uses include light industry; small to medium sized manufacturing and repairs; wholesaling; trade showrooms; retail showrooms where ancillary to manufacturing, fitting and business to business activity; car showrooms; and incubator units. Other uses may include warehousing, logistics, storage and distribution, subject to local considerations. Offices ancillary to the main light industry, manufacturing or employment use are also acceptable. Ancillary uses such as childcare facilities and small-scale local services, where they serve the local area, are open for consideration at an appropriate scale where they are subsidiary to the main employment uses and do not conflict with the primary zoning objectives. Pure retailing, retail warehousing, stand-alone offices and office-based industry will not generally be acceptable in this zone.

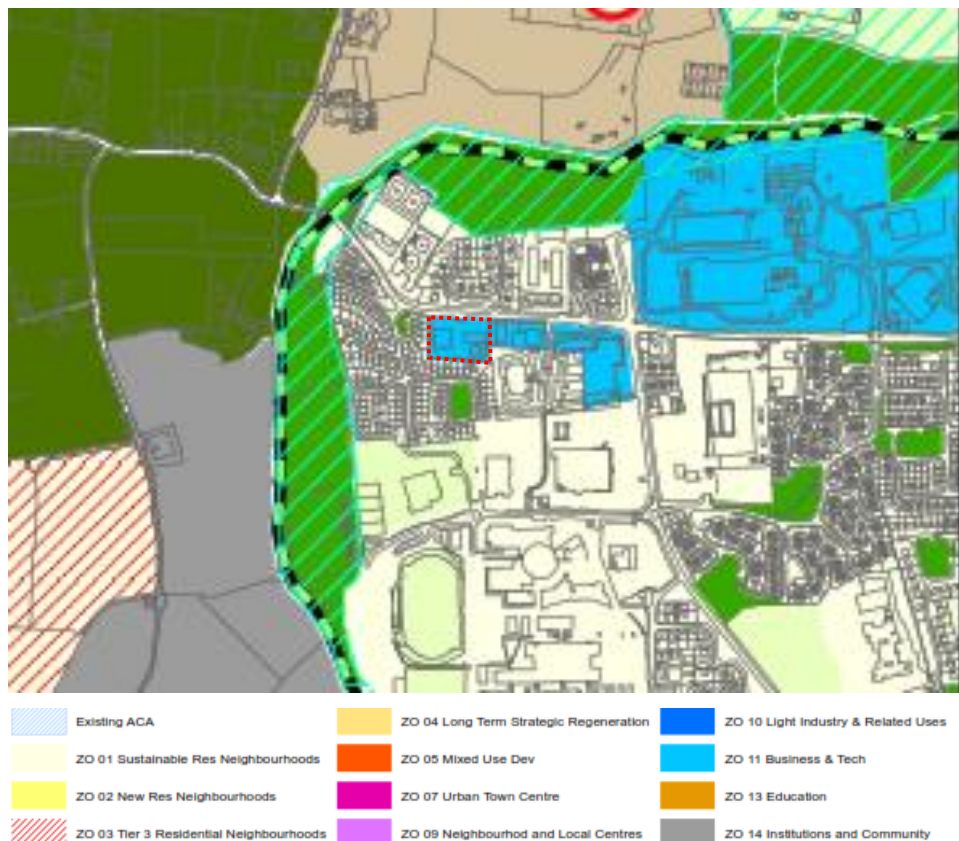


Figure 1: Extract from Cork City Draft Plan 2022 zoning map – MBP outlined in dashed red line



## 4. Rationale

This submission proposes to rezone Melbourne Business Park (MBP) from Light Industrial to 'ZO 09 Neighbourhood and Local Centre' for the following reasons:

- **The Model Farm Road area has a very significant catchment population which is not served by any local/neighbourhood centre**
- **A new local/neighbourhood centre on Model Farm Road in line with the Council's objective to provide a walkable City**
- **The need for a new local/neighbourhood centre on Model Farm Road was identified by the Council as far back as the 2007**
- **The provision of a neighbourhood centre is fully in accordance with the 2012 Retail Planning Guidelines**

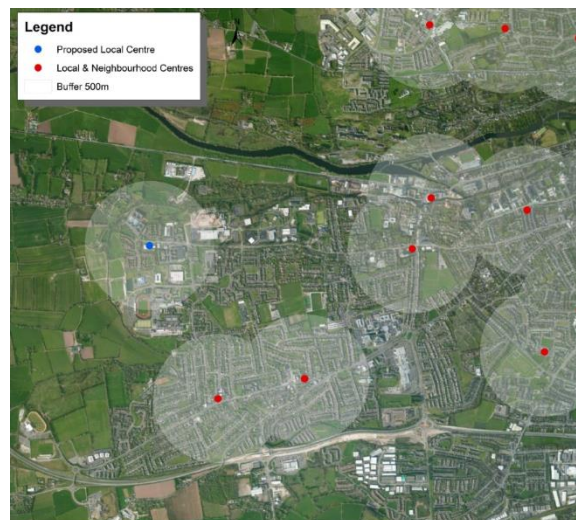
### 4.1 Retail Catchment

The Model Farm Road area has a very significant catchment population of approximately 9,000 (see Table 1) which is currently not served by a local centre/neighbourhood centre.

Based on a catchment of 5 minutes walking distance around the site, the population for the proposed neighbourhood/local centre would be in the order of 3,000. Based on a wider catchment of 10-15 minute walking distance from the site, the population for the proposed neighbourhood/local centre would be in the order of 9,000.

In addition to the very significant population, the area also has a very significant employment and student population, due to its proximity to Cork Institute of Technology and a number of large companies / employers such as Stryker and Boston Scientific. It is also situated close to areas proposed for the expansion of employment uses in Curraheen.

This catchment population is currently not served by any local or neighbourhood centre within walking distance. The Figure opposite indicates the 500 metre or 5 minute catchments surrounding the proposed Local/Neighbourhood centre on the MBP site (blue dot). This map, which also shows existing centres (red dot) clearly illustrates the gap in existing provision of a 'Neighbourhood/local centre' for the Model Farm Road area.



The nearest local or neighbourhood centre serving the area, is on average 1 kilometre from this catchment population. Model Farm Road does therefore have an unquestionable demonstrable need for a new local/neighbourhood centre.

The lack of any zoning/designation for a new local/neighbourhood centre on Model Farm Road in the draft CDP is completely at odds with the Council's objective to facilitate and support the development of new Neighbourhood/local centres where there is a demonstrable need.



## 4.2 Need for a Neighbourhood Centre

A local/neighbourhood centre for Model Farm Road was first identified by the Planning Policy Section of Cork City Council in the Bishopstown and Wilton Area Action Plan 2007. The objective to provide a new neighbourhood centre was then enshrined in to the 2009 City Development Plan, which sought to provide for a number of new 'Neighbourhood/local centres' to facilitate existing and emerging populations.

Since the 2009 City Development Plan, 'the lack of local retail services for the existing and rapidly expanding population in this part of the City has not been acknowledged. From a planning perspective, there is no rational planning explanation as to why the City Council would retreat from their previous commitment to provide a new neighbourhood/local centre on Model farm Road. In fact, since the 2007 LAP and 2009 CDP, there has been a significant increase in population in this part of the City, including a significant increase

in the student population, making the need for a new neighbourhood/local centre on Model farm Road even more apparent.

In considering this submission, it is important to point out that our clients had previously proposed a new neighbourhood/local centre on the Melbourne Business Park (MBP) site under Cork City Council Ref. 11/34947/ABP Ref.241794 in Block B, of the existing Business Park. This proposal was supported by the Council's planning officials but was opposed by a number of existing retail/commercial operators in the area and subsequently was not supported by the members of Cork City Council. On appeal, An Bord Pleanála's planning inspectorate again fully supported the proposed neighbourhood/local centre and while the Board initially granted permission for the neighbourhood/local centre, following a legal challenge of the Board's decision by a number of parties who had competing commercial interests, the Board rescinded its earlier decision to grant permission and decided that it was not technically open to the Board to grant permission (in accordance with section 37(2)(b)(ii) of the Act) as the site was not zoned for local/neighbourhood centre use.

In considering this submission, it is therefore very important to point out that from a planning perspective, the previously proposed neighbourhood/local centre on the MBP site was fully supported and was only refused by the Board, following a third-party seeking leave for judicial review against the Board's decision. Given the volume of support from a planning perspective for a new local/neighbourhood centre on Model Farm Road, there is absolutely no reason why the Council should row back from their previous commitment to provide a new local/neighbourhood centre on Model Farm Road.

### 4.3 Compliance with 2012 Retail Planning Guidelines

The criteria for neighbourhood/local centres in the 2012 Retail Planning Guidelines (RPG's) includes serviceability, viability and availability, these criteria strongly support the provision of a neighbourhood/local centres within MBP:

**Capable of being accessed and serviced:** Melbourne Business Park (MBP) is already serviced and has good access and ample car parking provision (i.e. 95 no. existing car parking spaces). The area is served by BusConnects and a very frequent bus service, but most importantly the site is within easy walking distance for a substantial number of local residents, students and employees working in the area.

**Viable for the proposed use:** Given the very significant population and the very significant employment and student population for the area and the obvious deficiency of a local/neighbourhood centre in this part of the City, the viability of a new local centre on our clients' site is easily justified and that a new neighbourhood/local centre would not only be viable, but critical in terms of providing much needed local services in this part of the City Suburbs.

**Available for the proposed use:** One of the key criteria in undertaking a sequential test in accordance with the Retail Planning Guidelines is that the site has to be “likely to become available within a reasonable period of time”. If zoned, our client will develop a neighbourhood/local centre at MBP in the short term.

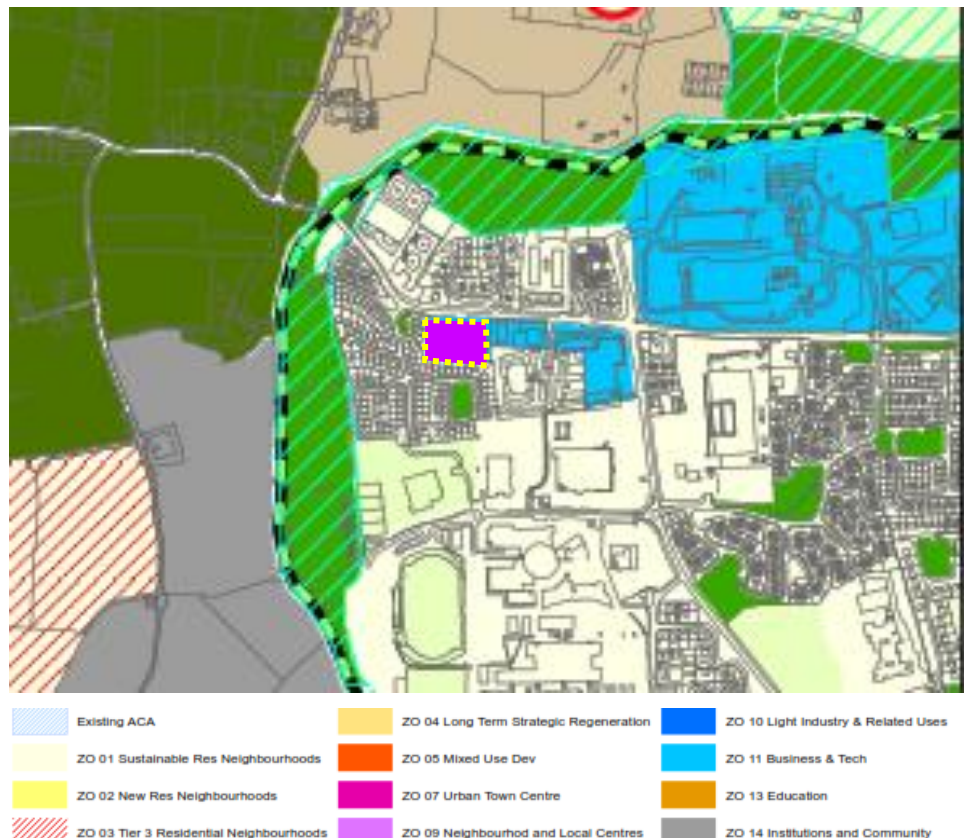
The provision of a neighbourhood centre on our clients’ site is therefore fully in accordance with the 2012 Retail Planning Guidelines, and would form an important part of the retail hierarchy for this part of the Metropolitan Cork Area.

## 5. Summary

We firmly believe that the provision of a neighbourhood/local centre on our clients’ lands at Melbourne Business Park on Model Farm Road is warranted and would have a very positive impact on the area. Based on need and sequential test of our clients’ site, we firmly believe that the Melbourne Business Park site is the most suitable and available site in this part of the suburbs to accommodate a new neighbourhood/local centre.

This submission therefore requests the following amendments

- **Rezone Melbourne Business Park from Light Industrial to ‘ZO 09 Neighbourhood and Local Centre’.**





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**