

Submission to the Draft Cork City Development Plan

For Development at St. Patrick's Woollen Mills,
Douglas, Cork

on behalf of St. Patrick's Woollen Mills Ltd

October 2021



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CHARTERED PLANNING CONSULTANTS

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Contents

1. Introduction	3
2. Site Context.....	3
3. Existing Planning Policy.....	4
3.1 Project Ireland 2040 – National Planning Framework (NPF).....	4
3.2 Regional Spatial & Economic Strategy for the Southern Region (RSES) 5	
3.3 Cork County Development Plan 2014.....	5
3.4 Ballincollig Carrigaline Municipal District Local Area Plan 2017.....	6
3.5 Metropolitan Cork Joint Retail Strategy	8
3.6 Cork Metropolitan Area Transport Strategy.....	8
3.7 Cork Cycle Network Plan.....	9
3.8 Draft Cork City Development Plan 2015.....	11
4. Rationale for Requests	12
5. Conclusion	15

1. Introduction

This submission to the draft Cork City Development Plan is prepared by McCutcheon Halley Chartered Planning Consultants in response to public notices inviting submissions from third parties and interested parties on the Cork City Development Plan review in accordance with section 12(2)(b) 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 is prepared on behalf of St. Patricks Woollen Mills and relates to the District Centre of Douglas, Cork. Our client's landholding is located to the west of Douglas Village Shopping Centre. The approximate site boundary of our client's site is outlined in red in Figure 1 below.

This submission requests the following in the forthcoming Development Plan for Douglas:

- The zoning of our clients' land to be afforded a District Centre zoning in the forthcoming Development Plan

This submission is structured as follows:

- Site Context
- Existing Planning Policy
- Site History
- Rationale
- Summary and Submission Request

2. Site Context

St. Patrick's Woollen Mills is located in west central Douglas Village, adjacent to Douglas Village shopping centre and lies within the area defined as Douglas Village in the Ballincollig-Carrigaline Municipal District Local Area Plan. Access to the Woollen Mills is via the R851 with good connections 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 district centre.

The Woollen Mills was originally a fabric mills exporting to locations around the world and today comprises a mix of uses ranging from retail, light industrial and commercial. These include kitchen and home furnishings, a veterinary clinic, a medical centre, picture framers and a café. The complex is made up of a series of buildings comprising different unit sizes with car parking located around the units. A large public car park, serving the village of Douglas is located at the western end of the complex.

Similarly, a Medical Centre which serves the Douglas area is located at St. Patrick's Woollen Mills and provides medical services including a walk-in clinic 7 days a week.

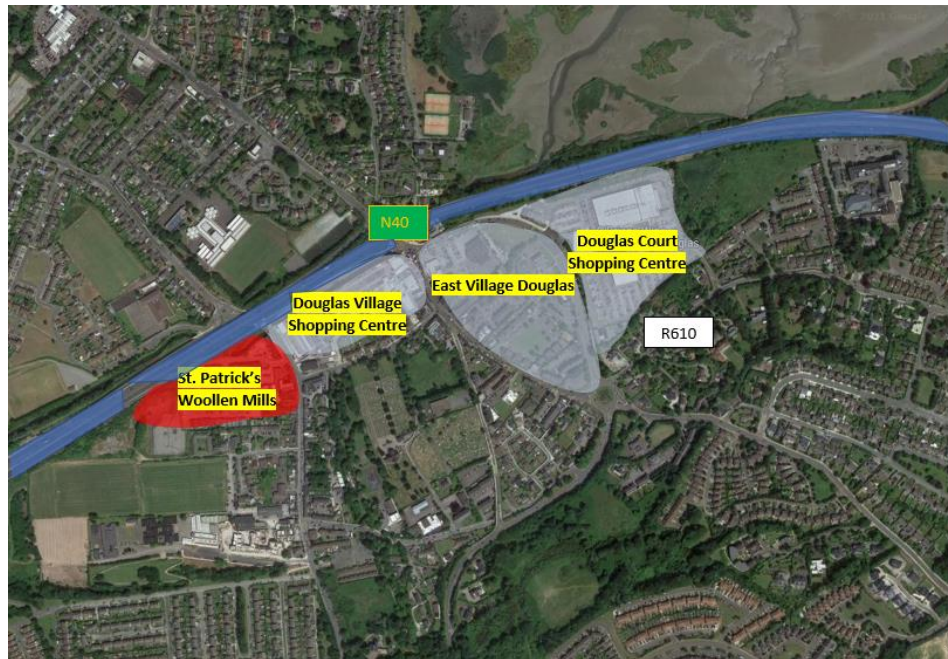
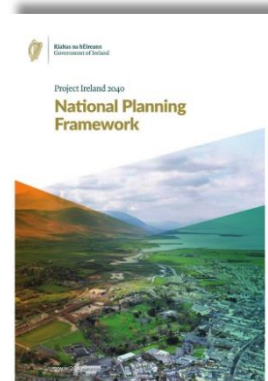


Figure 1 Site Context – indicative location of Site outlined in red

3. Existing Planning Policy

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.



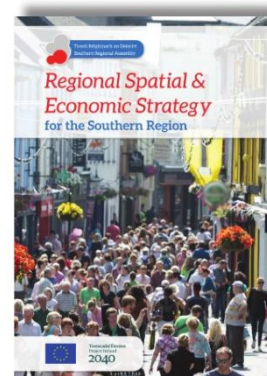
The NPF notes that the employment growth in Ireland is subject to our capacity to accommodate it. The NPF promotes the increase in population growth whilst also seeking to improve urban infrastructure and amenities, enterprise opportunities and the built environment. This will ensure that we can continue 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

The Douglas Woollen Mills Complex lies 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,”

The Douglas Woollen Mills Complex sits within the County Metropolitan Strategic Planning Area, which is noted as the main engine of population and employment growth for the region (Para 2.2.22). In this regard, Objective CS 4-1 prioritises certain locations, including the South Environs, to accommodate the planned population growth in the Cork Gateway region:

“g) Develop the Cork City Environs so that they complement the City as a whole. In the south, priority should be given to consolidating the rapid growth that has occurred in recent years by the provision of services, social infrastructure and recreation facilities to meet the needs of the population.”

3.4 Ballincollig Carrigaline Municipal District Local Area Plan 2017

In the 2017 Ballincollig – Carrigaline Municipal District Local Area Plan (LAP), the Douglas Woollen Mills forms part of the southern suburbs of Cork City. The current Local Area Plan (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."

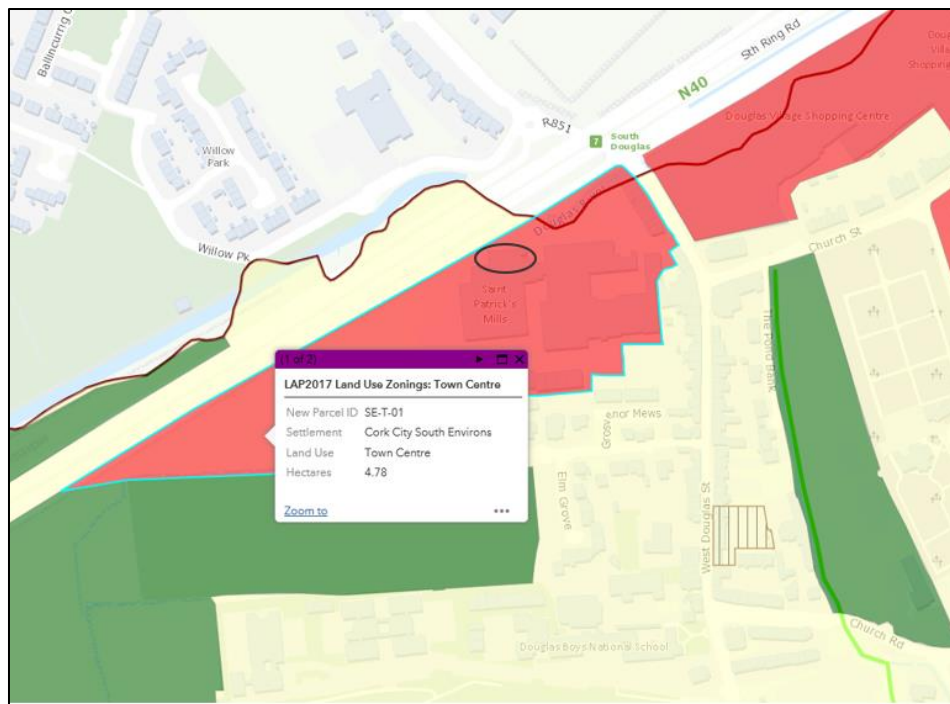


Figure 2 Extract from 2017 Ballincollig Carrigaline Municipal District Local Area Plan – Indicative location of site outlined in black.

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

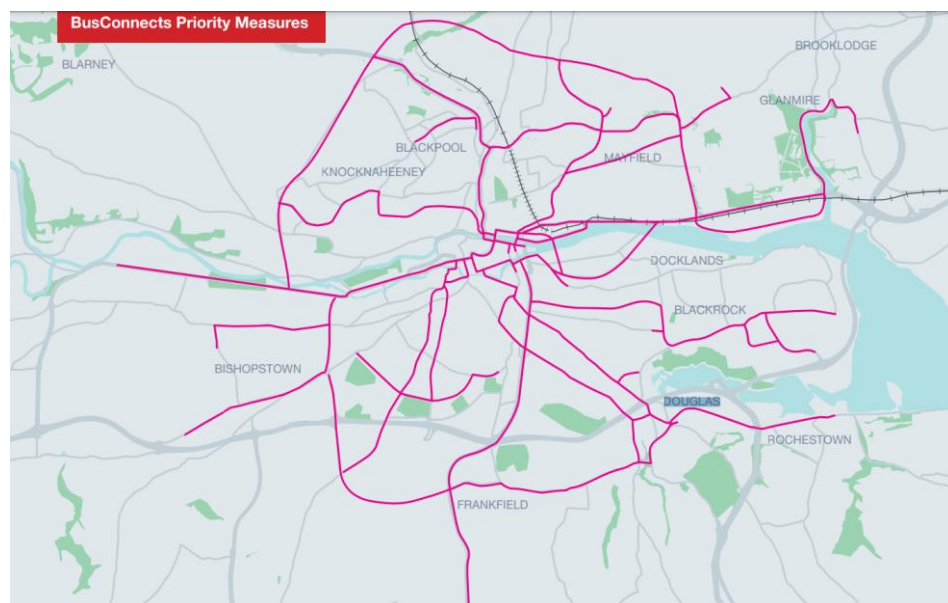


Figure 3 Extract from Cork Metropolitan Area Transport Strategy

3.7 Cork Cycle Network Plan

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

3.8 Draft Cork City Development Plan 2015

In the Cork City Draft Development Plan 2022 the site is proposed to be zoned for Urban Town Centre under ZO 07 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.”

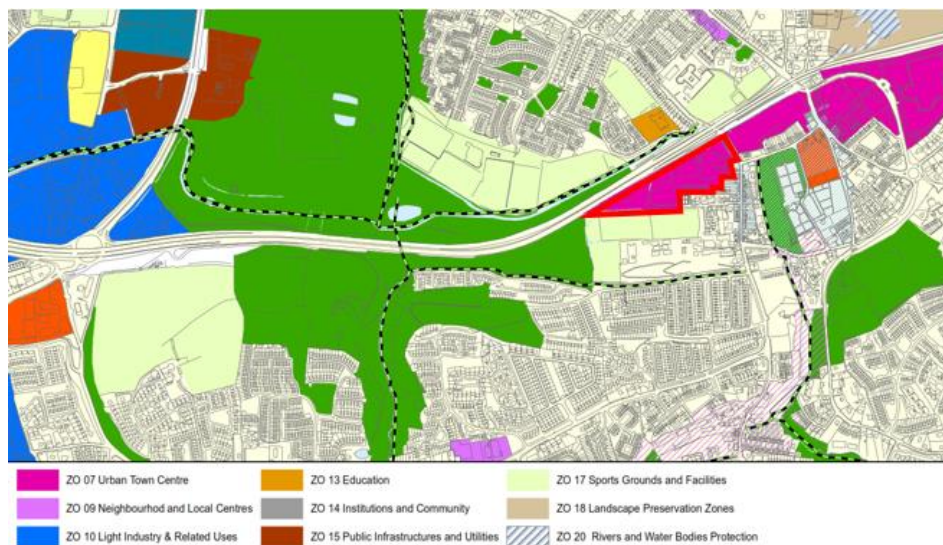


Figure 5 Extract from Cork City Draft Plan 2022

The following is also noted under this objective:

ZO 7.1 - This zone applies to the central areas of the major urban towns of Ballincollig, Blarney and Glanmire. These areas each have distinct characters and cultures and have great potential to contribute to the sustainable compact growth of Cork City. Chapter 7 Economy and Employment sets out further objectives for Urban Town Centres.

ZO 7.2 - The primary purpose of this zone is to consolidate and develop the existing urban town centre areas as primary locations for retail, economic, residential, cultural, community, leisure, civic and other related uses. The primary retail areas will form the main focus and preferred location for new retail development, appropriate to the scale and function of each centre. Residential development will be encouraged particularly in mixed use developments.

ZO 7.3 - Development proposals in this zone must demonstrate how the proposal would respect, reflect or contribute to the character and vibrancy of the particular urban town centre, commensurate with the nature and scale of the development. Developments must deliver a quality urban environment and public realm with a focus on accessibility and permeability.

Objective 10.81 of the Plan noted the following in relation to St. Patrick's Woollen Mills:

To support proposals which improve the urban environment, facilitate greater connectivity, permeability and synergy with the wider District Centre and enhance the mixed-use offering at the site.

4. Rationale for Requests

Our client has a strategic land holding in Douglas that is fully serviceable and available for further development. If Douglas is to deliver on its strategic function as an employment centre, the strategic planning policy context must support viable retail development during the lifetime of the forthcoming Development Plan, on lands such as our clients' land holding. We would therefore ask that the Council amend the draft Zoning Map 07 to include **all of our clients' lands** as part of Douglas District Centre in the forthcoming Development Plan.

The purpose of this submission to the Draft Cork City Development Plan is to demonstrate that there is a well-established District Centre use located within this area and to ensure the Plan protects and supports any future expansion/growth of this use.

The role of Douglas in the Draft Cork City Development Plan is to:

Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS

Figure 6 below denotes Douglas as Level 2 District Centre however this is not reflected in the zoning map for the lands.

Cork Metropolitan Area Retail Hierarchy (Cork City locations shown in black, Cork County locations shown in bold blue type)

Local Level	Type of Centre	Name of Centre
Level 1	Metropolitan Centre	Cork City Centre
Level 2	Planned District Centre	Ballyvolane
Level 2	District Centre	Blackpool
Level 2	District Centre	Douglas
Level 2	Planned District Centre	Hollyhill
Level 2	District Centre	Mahon Point
Level 2	District Centre	Wilton
Level 2	Large Urban Town Centre	Ballincollig
Level 2	Planned District Centre	Cork Docklands
Level 2	Large Metropolitan Town Centre	Carrigaline
Level 2	Large Metropolitan Town Centre	Cobh
Level 2	Large Metropolitan Town Centre	Midleton
Level 3	Small Urban Town Centre	Blarney
Level 3	Small Urban Town Centre	Glanmire
Level 3	Small Metropolitan Town Centre	Carrigtwohill
Level 3	Small Metropolitan Town Centre	Monard
Level 3	Small Metropolitan Town Centre	Passage West
Level 4	Neighbourhood / Local Centres and Large Village Centres	Identified on zoning maps

Figure 6 Extract from Draft Cork City Development Plan

Similarly, the Cork City Concept Plan also notes Douglas as a District Centre.

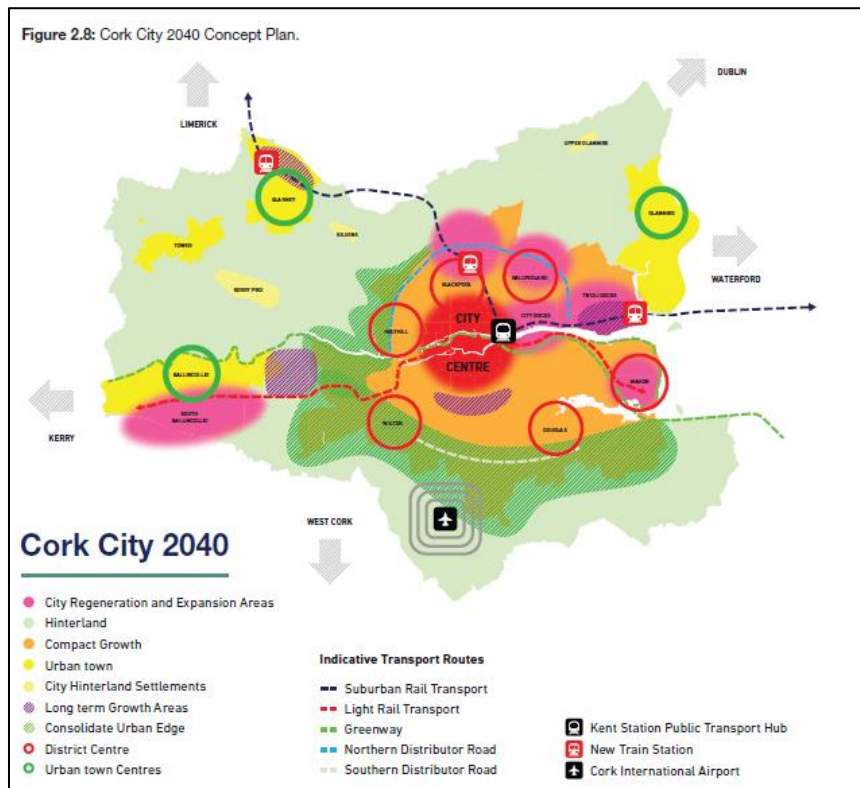


Figure 7 Extract from Draft Cork City Development Plan

District Centres and Large Urban Town Centres are at Level 2 in the Retail Hierarchy, performing a range of retail and non-retail service functions including the provision of a range of convenience shopping, a range of comparison outlets and local services such as banks, post office, restaurants, public houses, community and cultural facilities. They serve a localised function and provide for the weekly shopping needs of their catchment areas.

District Centres are the centres located within the City Suburbs (Blackpool, Wilton, Mahon Point and **Douglas**) and Large Urban Town Centres include Ballincollig Town Centre.

The inclusion of all of our client’s lands within the District Centre for Douglas is compliant with the above objectives. Our client’s site at Douglas Mills is already serviced and has good access and ample car parking provision. The area is served by a very frequent bus service, but most importantly the site is within easy walking distance for a substantial number of local residents and employees working in the area. Similarly, a number of transport improvements have been identified in the Cork Metropolitan Area Transport Strategy.

The site has good access to the local footpath network and public transport routes. In order to achieve the above objective, we request that our client’s entire landholding be included within the District Centre zoning. This will allow for any future growth/expansion to be supported by the City Development Plan.



Figure 8 Cork City Strategic Employment Location Study

Our client’s landholding is zoned for Urban Town Centre under ZO 07 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”,

but this is not consistent with the objectives set out in the Draft Plan where it is noted that Douglas is a **District Centre**.

Therefore, it is requested that the Council Amend draft Zoning Map 07 to include our clients' lands as part of the Douglas District Centre Zoning under objective ZO 8 where it is an objective to "*provide for the development and enhancement of district centres as mixed-use centres and as primary locations for retail, economic and residential growth.*"

5. Conclusion

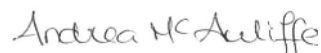
On behalf of our clients, we would be grateful if this submission could be given careful consideration during the preparation of the Cork City Development Plan 2022-2028.

As set out in detail above, we submit that the forthcoming Cork City Development Plan should consider the following:

- The zoning of our clients' land to be afforded a District Centre zoning in the forthcoming Development Plan

We would welcome the opportunity to discuss this submission in greater detail with the City Council's planning officials. If you require any additional information, please do not hesitate to contact the undersigned.

Yours sincerely,



Andrea Mc Auliffe
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