

CUNNANE STRATTON REYNOLDS

Submission to Draft Cork City Development Plan 2022-2028

On behalf of O'Callaghan Properties

by

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1.0 Introduction

Cunnane Stratton Reynolds makes this submission to Cork City Council on behalf of O'Callaghan Properties (OCP), 21 Lavitt's Quay, Cork.

Our client welcomes the opportunity to make a submission on the Draft Cork City Development Plan 2022-2028 which is currently subject to public consultation until 4th October 2021.

2.0 Executive Summary

As owners of strategic lands within the Cork South Docklands, O'Callaghan Properties is a key stakeholder in the preparation of the Cork City Development Plan 2022-2028 under which the development of the Docklands must commence in order to meet the significant population and employment growth rates that have been set out for Cork City to 2028 and beyond in Project Ireland 2040.

O'Callaghan Properties is progressing with plans for the development of its significant landbank at South Docklands and this submission relates specifically to this strategic part of Cork City Centre that has been earmarked as the largest regeneration project in Ireland.

Our client's sites in Cork Docklands will be amongst first to be developed in a logical sequence emanating from the City Centre and availing of its proximity to high frequency public transport. Their development will act as a catalyst for further development of the City Regeneration and Expansion Area in Cork Docklands identified in the Draft Plan. It will also bolster the economic rationale for the public investment in infrastructure necessary to realise the ambitions for this long-identified strategic area.

As an established, experienced property development company operating in Cork City, O'Callaghan Properties asks that Cork City Council carefully consider the recommendations and comments within this submission that seek to support the sustainable of the Cork Docklands, a common objective for both organisations.

The key points of this submission have been set out under the following sections below:

- Draft Plan Land Use Zonings South Docklands
- Draft Plan View Management Framework
- Draft Plan Car Parking Standards
- Call for publication of Supporting Documents

3.0 Proposed Land Use Zonings South Docklands

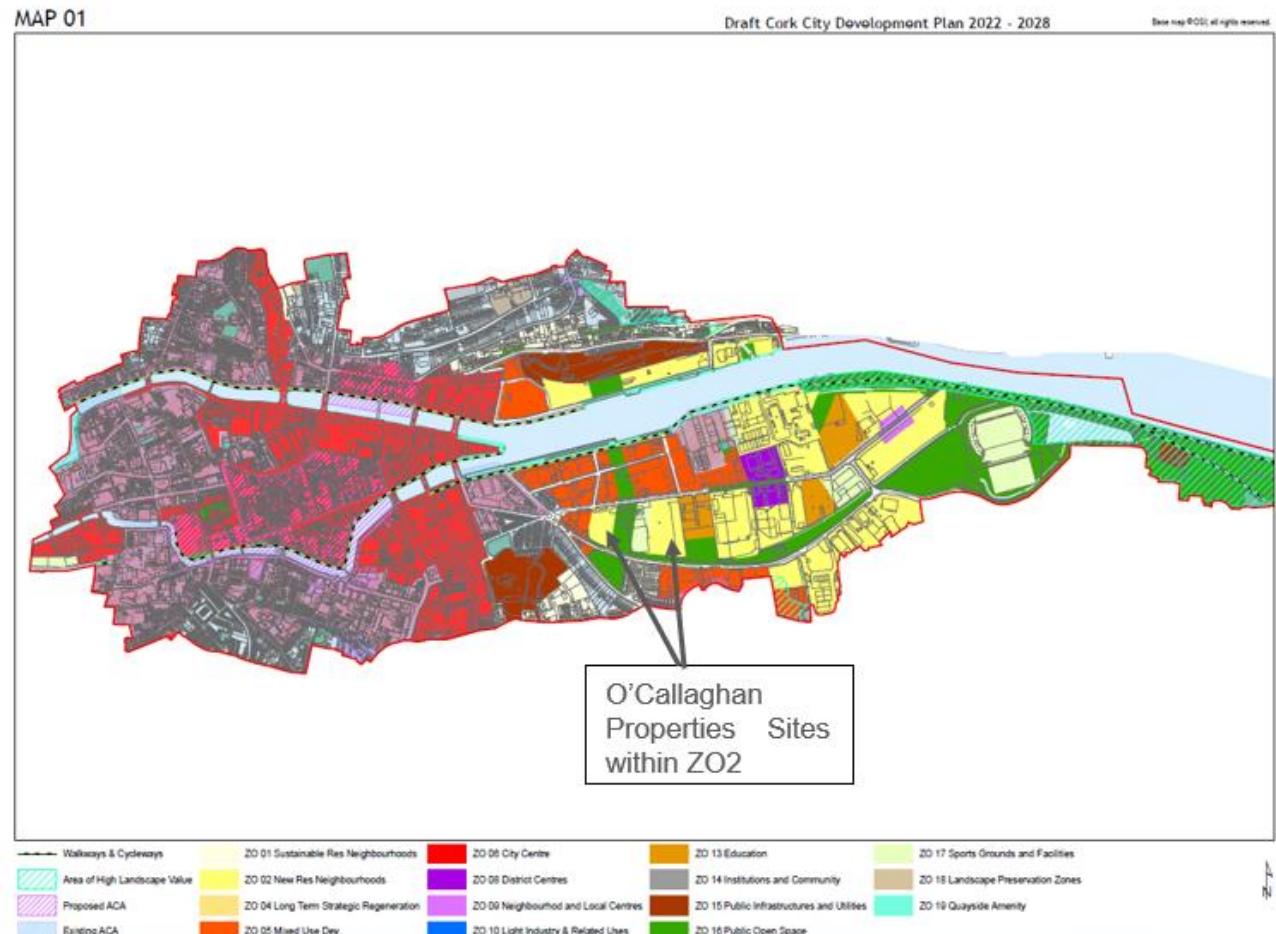
3.1 OCP Sites to Retain Mixed Use Zoning

The Draft Plan proposes a number of changes in land use zoning for the South Docklands. Of most concern is the significant amount of land, including some sites within the ownership of O'Callaghan Properties, that is being proposed within "ZO2 New Residential Neighbourhood". In the Draft Plan, this land use zoning objective replaces the Mixed-Use zoned sites as the predominant zoning within the Docklands.

Draft Development Plan objective ZO2 seeks “*to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure*” on these sites.

It is acknowledged that there is some flexibility within the ZO2 New Residential Neighbourhood zoning objectives for the development of supporting residential infrastructure, however, the Draft Plan clearly indicates that developments will be ‘primarily residential’.

Figure 1 Map 06 in the Draft Cork City Development Plan



The previous South Docklands Local Area Plan combined mixed use zonings and non-prescriptive residential/ non-residential ratios. In the current Cork City Development Plan, the vast majority of the South Docklands is zoned for mixed use development (Figure 2). This flexibility in land uses creates a lively and sustainable extension to the City Centre in accordance with the vision for the development of the Docklands as “a vibrant mixed use and socially inclusive urban quarter”. It also confers the flexibility that enables the planning authority, developers and other stakeholders to react and adapt to changing circumstances over time, given the rapid change and uncertainties that characterise the external environment of Cork. In addition, as a result of recent developments in how technology is used, people’s lifestyles are changing rapidly and will continue to do so.

It is submitted that this flexibility should be maintained in the emerging Cork City Development Plan 2022 to stimulate and encourage appropriate development within the City Centre and South Docklands. This flexibility will enable the development management process to respond creatively to the needs of regeneration in areas such as the Cork Docklands.

This theme is explicitly stated in the current and draft National Development Plan Guidelines which recommend sufficient flexibility in the application of zoning and development management policies and standards (e.g. enabling compatible mixed uses) to ensure that development plans actively promote rather than inhibit regeneration.

The proposed application of the New Residential Neighbourhood zoning to a large proportion of sites within the South Docklands as indicated in Figure 1 will result in mono/single use developments comprising predominantly residential land use arising. This would be a surprising and sub-optimal outcome for an area long designated by Cork City Council in its policy documents as an extension of the city centre. We believe that the proposed zoning approach for the South Docklands in the Draft Plan will not create conditions conducive to the required large-scale regeneration of this area. It has the potential to undermine the vision for the development of the docklands as set out in the National Planning Framework (NPF) and the Southern Regional Spatial and Economic Strategy (RSES), both of which set the strategic context for the Draft Plan.

The NPF includes the mixed-use development of the South Docklands as a Key Future Growth Enabler as follows:

“Delivering ambitious large-scale regeneration projects for the provision of new employment, housing and supporting infrastructure in Cork Docklands (City Docks and Tivoli) as integrated, sustainable developments, including relocation of two ‘Seveso’ sites from the City Docks”.

The Southern RSES lists South Docklands as a Strategic Residential (including mixed use) and Regeneration Area:

“The redevelopment of the North and South Docklands and Tivoli is one of the most significant urban regeneration schemes in Ireland. It will require significant investment in supporting infrastructure to proceed. The City Docks, over 160 ha, comprises the North and South Docks. Through Local Area Plan process, Cork City Council are seeking to regenerate the brownfield site as a sustainable, vibrant, mixed use socially inclusive quarter, an extension of the city centre, capitalising on its waterside setting, access to city centre and public transport networks. Strong urban design and place making principles are at the core of the regeneration initiative. The regeneration of the Cork City Docks provides significant opportunities for new enterprise and employment uses”.

The proposed zoning approach for South Docklands also conflicts with the wider objectives within the Draft Development Plan including Objective 2.8 which seeks to create a 15-Minute City:

“To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City’s liveability”.

Furthermore, section 10.45 of the Draft Plan that indicates that the *“City Docks land use strategy reflects the City Docks Vision to develop an extension of the City Centre, a new sustainable residential neighbourhood and to create a green lung for the City”*.

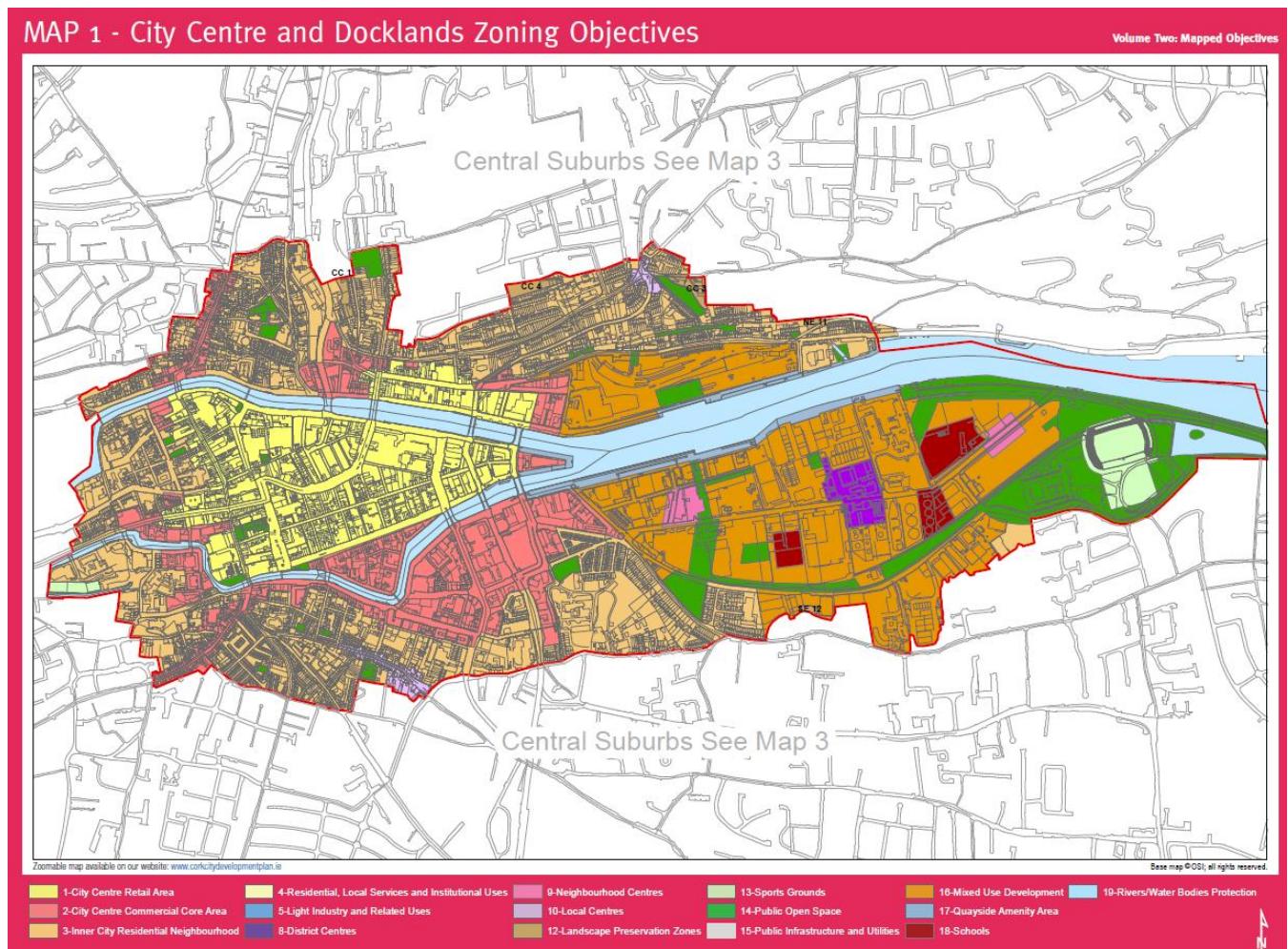
Moreover, Objective 10.26 *Specific Land Use Objectives* states that it is an objective of Cork City Council to ensure that live ground floor uses are provided in appropriate locations and restricted in all other areas to ensure a good quality of residential amenity in the new residential neighbourhood.

Such appropriate locations include Centre Park Road and Monahan Road as indicated at Section 1.47 of the Draft Plan:

“Live ground floor frontage will be considered appropriate within the Mixed-Use Zone area and the zoned District Centre and neighbourhood centres. Live ground uses can bring positive benefits to key locations including...Centre Park Road and Monahan’s Road; Key corners; and Frontage onto key spaces”.

The viability of residential development continues to be challenging and it is submitted that the achievement of live ground floor frontage will be more difficult at Centre Park Road and Monahan Road on sites that are zoned for New Residential Neighbourhoods and intended to consist of primarily residential development.

Figure 2 Map 1 in Current Cork City Development Plan 2015 showing Mixed Use Zoning



Similarly, flexibility is required to be applied to the ‘target land use split’s’ set out within Table 10.3 and Tables 10.6-10.13 of the Draft Plan to prevent the South Docklands becoming a predominantly residential dormitory extension of Cork City Centre that fails to achieve a truly vibrant area through a mix of uses as envisaged. It is noted that the residential floorspace ratio for certain character areas is particularly high.

Figure 3 Table 10.3 of the Draft Cork City Development Plan 2022-2028

Character Area	Indicative Floorspace Capacity	Indicative plot ratio – Floor Area Ratio (FAR)	Residential Floorspace %	Non-Residential Floorspace %
Lower Glanmire Quarter	50,000	2	90	10
Warehouse Quarter	75,000	2.25	30	70
Ford-Dunlop Quarter	210,000	2.25	30	70
Wharf Quarter	175,000	2.25	85	15
Marina Walk	90,000	2.5	90	10
Monahan's Quay	165,000	2	90	10
Canal Walk	160,000	2	80	20
Polder Quarter	160,000	2.25	95	5
City Docks	1,085,000	2.25	65	35

Having regard to the above, it is submitted that if Cork City Council is to realise its vision for the South Docklands (as articulated since at least 2001) as an extension to Cork City Centre comprising a full range of typical city centre uses, the policies and objectives, including in particular land use zoning objectives, within the emerging plan must not be overly prescriptive in terms of the possible future development of sites.

It is submitted that a Mixed-Use zoning objective can and will deliver truly sustainable residential development within the South Docklands as set out in the emerging plan zoning objective ZO5 which seeks “*to provide and promote a mix of residential and other uses to ensure the creation of a vibrant and sustainable urban area*”.

As stated in the Draft Plan, the mixed-use zoning objective intends to facilitate the development of a dynamic mix of uses, including residential elements, which will interact with each other creating a vibrant urban area with residential, employment and other uses. It is noted that a vertical and horizontal mix of uses should occur where feasible, including active ground floor uses and a vibrant street frontage on principle streets.

O'Callaghan Property lands are strategically located. They are the first large development sites on Monahan Road and to the south of Centre Park Road as one approaches from the city centre. These sites also adjoin the proposed Kennedy Spine. We believe such sites at the entrance to the South Docklands and situated on principal, higher order streets would be more appropriately zoned to facilitate mixed use, including residential development, as envisaged by our client rather than predominantly residential development with potential for some, but limited ancillary uses.

For the above reasons, it is requested that our client's sites between Centre Park Road and Monahan Road that are indicated within the New Residential Neighbourhood Zoning should retain their extant a Mixed-Use land use zoning objective. Please refer to Figure 4 which outlines in red the sites requested to remain within a Mixed-Use land use zoning objective category.

Figure 4 OCP Sites on Centre Park Road and Monahan Road

3.2 ZO 16 Public Open Space and ZO 17 Sports Grounds and Facilities in South Docklands

The main concerns in relation to zoned public open space and sports grounds and facilities are the extent of land allocated for these purposes within the OCP landholding; the implications these zonings will have on the development of other zoned lands within our client's ownership; and the proposed requirement for at least 15% public open space within South Docklands developments.

In 2020 O'Callaghan Properties prepared a draft masterplan for the development of their landholding at South Docklands with Henry J Lyons Architects. Henry J Lyons have carried out a full review of the proposed zoning changes in the Draft Cork City Development Plan. A summary of this review is at Appendix 4 of this submission.

It is immediately evident that the proposed rezoning from mixed use to sports grounds and facilities and the proposed increase in width of Kennedy Spine will have a direct impact on the development capacity of our clients' lands.

As indicated at Appendix 4 of this submission, in the current Cork City Development Plan our clients' sites on Marina Walk, Centre Park Road and Monahan Road comprise 24.7% of public open space within the development site area or a ratio of 2.5:7.5 green space: development lands.

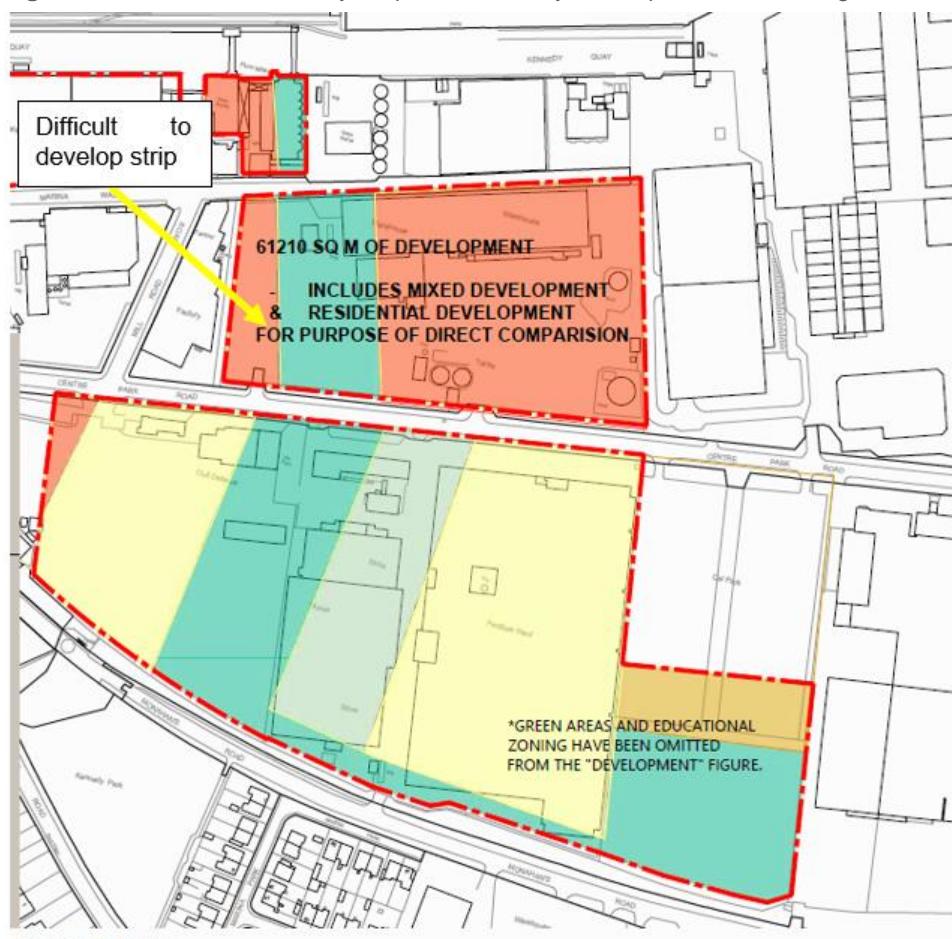
The comparison with the Draft Plan indicates that this would increase to 40.5% public open space and sports facilities on our clients' lands or a ratio of 2:3 green space: development lands. This is a substantial increase in public open space and amenity facilities especially when one considers the provision of public open space further west within South Docklands. The proposed substantial increase

in the open space zoning within the South Docklands is not justified. It is understood that Cork City Council are seeking to provide more open space within the core of the City Centre where existing provision is limited. It is submitted that the provision of these additional open spaces within the core of the city centre would be more appropriate in the interests of proper planning and sustainable development. There is sufficient zoned open space for the South Docks in the current City Development Plan and this is additional to the communal open spaces that will be included within developments.

An over provision of open spaces and pitches within the South Docks could have a detrimental impact on the wider objective of the Docklands regeneration project which aims to create a sustainable extension to Cork City Centre. The provision of large open spaces could result in a more suburban character not typical of docklands regeneration projects. Some of the most successful docklands developments in the world have delivered amenity in the form of waterfront promenades; civic parks and square and pocket and linear parks that are well linked rather than larger open spaces.

The location and configuration of the proposed sports grounds and open spaces will further frustrate the development of the OCP landholding. For example, Figure 5 shows that the relocated Kennedy Spine which has been substantially increased in width results in a narrow strip of land in OCP ownership that will be very difficult to develop. The increased width of Kennedy Spine is not necessary. It is requested that it is maintained in width as per the current Cork City Development Plan. We also respectfully request that the City Council consider the relocation of the proposed Kennedy Spine which will comprise a linear amenity park combining urban zones with green open space further west within the South Docks as indicated within Figure 10.8 of the Draft Plan (and included at Figure 6 below).

Figure 5 OCP Lands overlain by Proposed Draft City Development Plan Zonings



In relation to South Docklands in addition to the zoned public open spaces, paragraph 10.98 of the Draft Plan states that "*Developments will be required to provide (at least) 15% of their net developable area*

as public open space. Developments will be required to incorporate small-scale ARI (e.g. MUGAs / sports halls) commensurate to the scale of the proposed development and to meet the needs of the community. Outdoor facilities can be provided within public open spaces, streets, communal courtyards or at rooftop level".

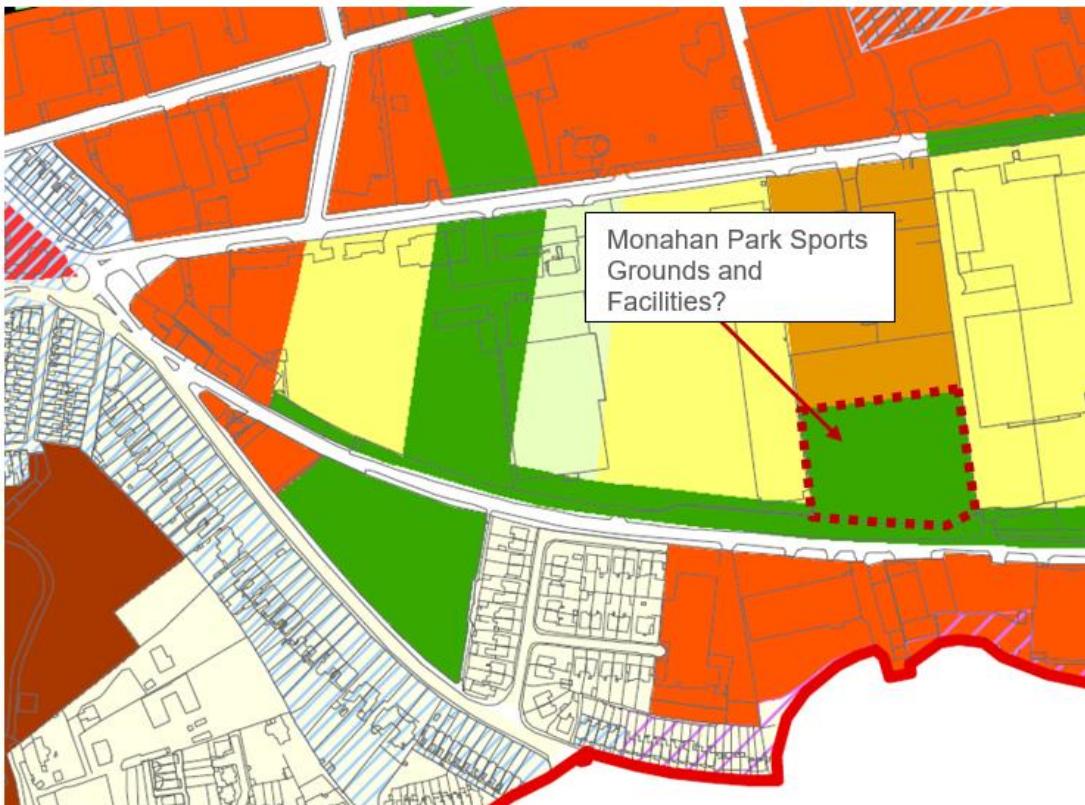
This is an increase of 5% on the general open space provision requirement of 10% in the current City Development Plan and table 11.11 of the Draft City Development Plan. This standard is considered to be high when compared to other Local Authorities and it could be detrimental to the vision for a new urban city quarter at South Docks. It is requested that general public open space provision of 10% should be maintained within the emerging plan for brownfield sites to encourage development. It is further submitted that some of the public open requirement should be met by the extensive quayside amenity areas and parts of the River Lee, as was the case in the South Docks Local Area Plan 2008 and the Cork City Development Plan 2009. The River Lee in particular has enormous active and passive recreation potential.

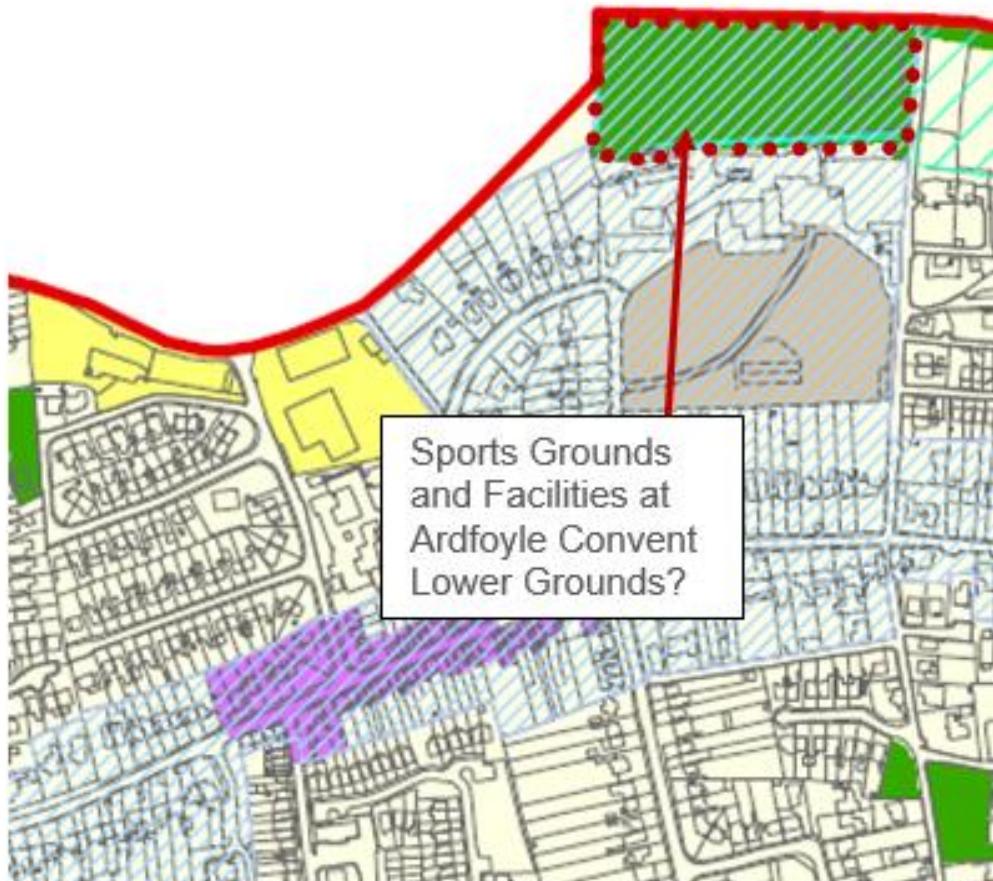
The Draft City Development Plan indicates that Cork City Council will support the provision of sports pitches at four locations as follows:

- Kennedy Spine (south);
- Monahan's Park (south of the western primary school);
- Ardfoyle Convent Lower Grounds; and
- Marquee Road / Centre Park Road / Monahan's Park

It is noted that the proposed Sports Grounds and Facilities for Monahan Park and Ardfoyle Convent Lower Grounds are indicated within the ZO16 Public Open Space in the Draft Plan zoning maps when they should be included within the Sports Grounds and Facilities zoning.

Figures 6a and 6b Proposed Sports Grounds and Facilities in Draft Cork City Development Plan 2022-2028





We do not believe that it is appropriate to include the land directly to the east of the proposed Kennedy Spine between Centre Park Road and Monahan Road within a Sports Grounds and Facilities Zoning from a land use planning perspective due to the close proximity of a proposed pitch as part of Monahan Park adjoining the school site to the southwest.

It is noted that the amenity assessments supporting the Draft Plan production do not identify a requirement for a playing pitch at this Kennedy Spine location:

- The Cork City Active Recreation Infrastructure (ARI) Study (Draft June 2021) for the draft plan does not identify a need for playing pitches at the site. At 9.10 of the ARI Study it is stated that; *“building new pitches within new designated areas is only one way to account for this demand,”* and does not identify a need for a playing pitch either at 10.15 Future Provision or 10.19 Policy Recommendations.
- The Cork City Green and Blue Infrastructure (GBI) Study (Draft July 2021) does not identify a need for sports grounds at City Docks at figure 14.3 or amongst the *City Scale GBI Priority Projects for Cork City* that focus on *City Docks and Tivoli Docks Urban Drainage Strategies*.

As mentioned, the Draft Cork City Development Plan envisages Kennedy Spine as the creation of a linear park extending from Kennedy Park to Kennedy Quay and also on Horgan's Quay, to the north of the River Lee. It is intended that the park will combine urban zones with green open spaces. Albeit indicated further west in location, Figure 7 below extracted from the Draft Development Plan presents an image of how Kennedy Spine could look with the proposed extension of Kennedy Park northwards towards the river and beyond and comprising linked urban green spaces in the form of a linear park.

The inclusion of land for Sports Grounds and Facilities directly adjacent to Kennedy Spine will create a much more expansive and wider green corridor at this location between Centre Park Road and Monahan Road. We believe this will have a negative impact on the vision for the spine as a linear urban

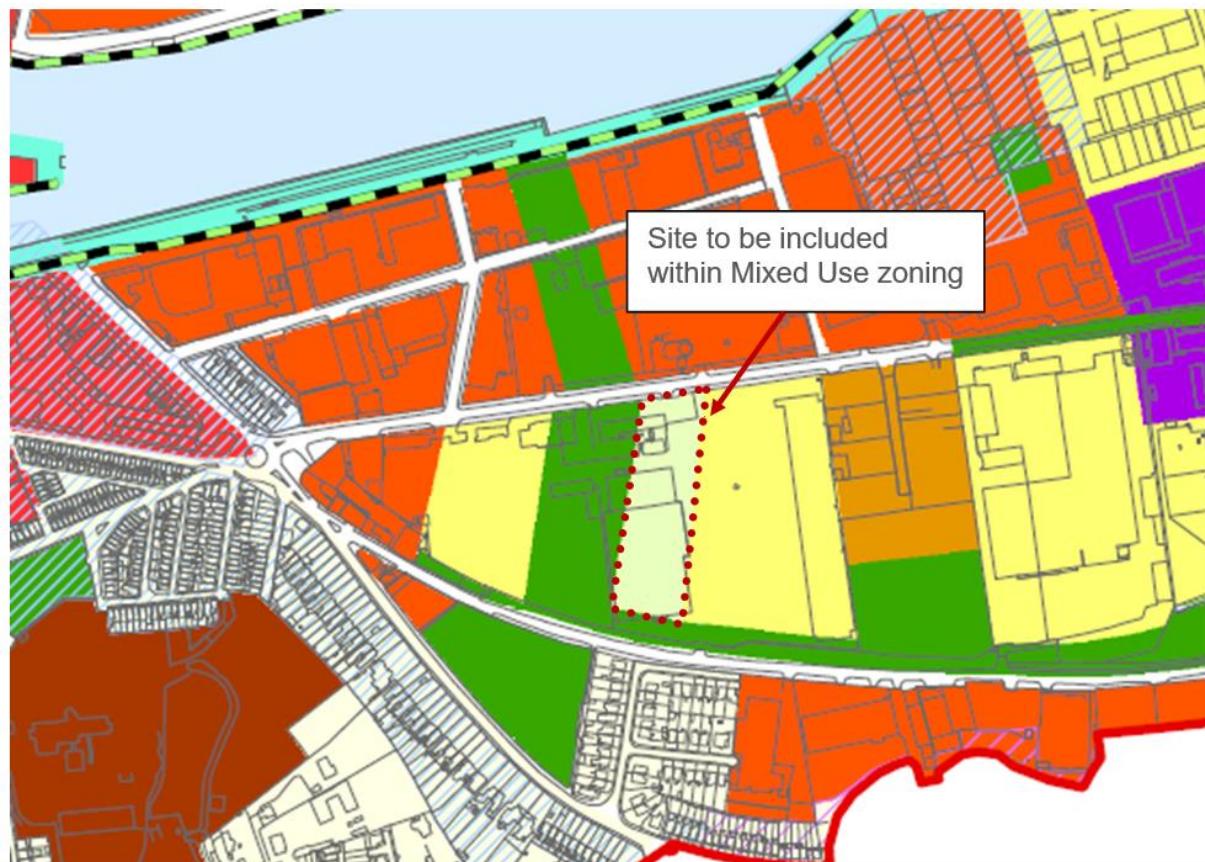
park that provides a place to rest and play and that draws people through dense docklands development towards the quayside. It will also create an unpleasant micro climate for those using it.

Figure 7 Extract from Draft Cork City Development Plan 2022-2028 (Figure 10.8)



In addition, we submit that sufficient land would appear to have been included for the provision of pitches at the three other locations identified above. As indicated within the Draft Plan these types of facilities are best suited to locations adjoining schools, where possible. The inclusion of the site to the south of the proposed school will ensure that sports grounds and facilities are evenly distributed across the Docklands area.

On the basis of the arguments made above, we request that Cork City Council remove the part of our client's site from within the Sports Grounds and Facilities land use zoning category as it is we believe surplus to requirements and instead include this within a Mixed-Use land use zoning category which would be considered more suitable land use to optimise development at this location within the docklands. It is further requested that the width of the proposed Kennedy Spine is maintained as per the current Development Plan and that it is relocated further west as previously envisaged.

Figure 8 Request to include Site in Mixed Use Zoning

4.0 Draft View Management Framework

The current Development Plan 2015 – 2021 is organised into 3 no. volumes: 1 written statement, 2 zoning and objectives map, and 3 built heritage objectives supported by SEA and AA Screening.

This format is repeated in the draft 2022 – 2028 Plan with an additional separate supporting SFRA. This mirroring is commended for the purposes of iteration and comparison.

Volume 3 Built Heritage of the current and draft Plans is summarised at Appendix 1 of this submission.

It is noted that the current *Protected Views and Prospects* have evolved into a *View Management Framework* in the emergent Draft Plan. This evolution is to be generally welcomed alongside the walkable neighbourhood and communities approach as a means to encourage greater densification of the City without loss of its defining socio-geographic personality. The use of neighborhoods and View Management Framework as strategic development management parameters will cumulatively amplify the uniqueness of Cork City in its further compact growth development where reuse of underutilised brownfield lands is encouraged.

This submission requests the clarification and revision of the Draft View Management Framework and associated lists and mapping. To aid the authority in actioning this request, it is broken down to match the sections of the draft Plan at the end (section 4.3) of this part of this submission.

4.1 Depiction of current Protected Views and Prospects compared to draft View Management Framework

The current plan contains maps that depict Views and Prospects which are also presented in list format. The draft Plan View Management Framework is also mapped and presented in list format. For illustration purposes, Appendix 2 of this submission records the content of each of the Draft View Management Framework Tables as it refers to the South Docklands area.

It is submitted that the draft View Management Framework lists do not appear to match the draft mapping and that the maps themselves lack the clarity of those in the current Plan.

The views and prospects scheduled in Tables 1 through 7 of the current Plan are mapped as *Views and Prospects* in Volume 2 of the current Plan on Maps 12 through 17. Each identifies: Landmark Buildings, Linear Views, River Prospects, Landscape / Townscape Views, Primary Approach Road, Old City Approach Road and Panoramic Viewpoint.

Further aid is provided as each view indicated by a line is numbered. Each of these views (linear, river, landscape / townscape, primary approach road, and old city approach road) views have a direction, indicated by an arrow.



The views and prospects scheduled in the Draft Plan are mapped on 6 no. *View Management Framework* maps in Volume 2. Each identifies: Strategic Landmark Buildings, Local Landmark Buildings, Strategic Viewing Locations, Strategic Linear Views and Viewing Location of linear views of special amenity value.



Not all of the lines on the maps are named and none are numbered.

None of the *viewing locations of linear views of special amenity value* are mapped with arrows, therefore the direction of the protected view is not clear, including if it is interpreted to be reciprocal.

The mapped designation of *viewing locations of linear views of special amenity value*, is combine a viewing location and linear view. There is no mapped symbol to indicate the origin of the linear view.

4.2 Conflation of building protection with view protection in draft View Management Framework

In the Draft Plan it is stated that the “*policy framework*” for Cork City’s *View Management Framework* is set out in Volume 1, Chapter 6 *Green and Blue Infrastructure, Open Space and Biodiversity* and advises that the policy framework be read in conjunction with Tables 1 to 4 of Vol. 3.

It is submitted that the Draft Plan, Volume 3 View Management Framework Tables and Maps at Volume 2 do not entirely correspond with one another having regard to the category labels in the tables and the map legend. It is submitted that this creates confusion and if unremedied, will naturally create inconsistency in the development management application of the View Management Framework. This lack of clarity for developers and designers that will lead to confusion in relation to development potential that will, in turn, delay or entirely frustrate the development and redevelopment proposals that the Draft Plan seeks to promote.

There are 14 no. ‘Landmark Buildings’ in the current views and prospects protection strategy. The number of landmark buildings appears to have more than doubled to 30 no. (Table 2 has 12 no. Strategic Landmark Buildings + Table 3 has 18 no. Local landmark Buildings) in the draft View Management Framework. It is noted that of the 12 no. ‘Strategic Landmark Buildings’ that nos. 6 and

11 appear to record more than one building. Relevant to South Docks is no. 6 “*City Docks Industrial Landmarks: R&H Hall Silo / Odlum’s Mill*”.

Having regard to the text at Chapter 6 *Green and Blue Infrastructure, Open Space and Biodiversity* to which the reader is referred from the View Management Framework, it is not clear on what basis ‘buildings’ were categorised into ‘Strategic Landmark Buildings’ or ‘Local Landmark Buildings’.

Legislation allows for the designation of individual buildings as Protected Structures by record (RPS), whose curtilage and therefore setting is automatically protected. It further allows for the designation of Architectural Conservation Areas (ACA) where collective sets of buildings and streetscapes can be protected. These designations are encouraged to coincide with statutory Plan making in the interests of efficiency, consideration of context and transparency. However, such building(s) are subject to their own adoption procedures that can be invoked outside of a statutory plan making process as prompted by the quality of the building(s) themselves. Though Protected Structure and ACA designations place a burden of responsibility on their owners and the authority, they are subject to subventions to encourage their conservation. The legislation, policy and designations supporting these designations are set out at Chapter 8 *Heritage, Arts and Culture* of the Draft Plan.

It is submitted that buildings named as strategic or local landmark buildings in the View Management Framework in the Draft Plan will subvert considerations, policies and designations of some of these buildings under architectural heritage designations elsewhere in the Plan. It is submitted that in essence, view and prospect *management* appears to have reduced to view *protection* in the Draft Plan and more seriously has conflated the protection of buildings with that of views.

At Section 6.30 of the Draft Plan it is stated that “*Strategic and local landmark buildings have been identified so that linear views of these buildings can be protected through the management of development. Strategic landmark buildings are those that are widely appreciated due to their visual prominence and the role that they play in helping people to orientate themselves within the City. Local landmark buildings are important within the City’s neighbourhoods due to their local visual prominence.*”

This statement appears to translate to item (e) of Objectives 6.14 Cork City View Management Framework; “*e) Strategic and local landmark buildings will need to be considered in the scoping of views to identify the potential impacts of development proposals.*” This statement creates the impression that it is the buildings and not the views that are to be protected.

It is noted that section 6.30 of the draft plan goes on to state that ‘*an illustrative list of local landmark buildings, is provided...*’ and will be added to in the plan lifetime. It is noted that the only thing approximating that list in the Draft Plan or the relevant supporting document (Green and Blue Infrastructure) is View Management Framework, Table 3 of Volume 3. There is a list of ‘strategic landmark buildings’ incorporated at Table 2 that is not mentioned in the written statement of the plan. It is requested that this section of 6.30 is deleted as it is misleading and further casually states an intention that ‘*..other local landmark buildings will emerge during the Plan period through the development management process, and where these are identified important linear views to these buildings will need to be taken into consideration.*’ Any further ‘buildings’ that ‘emerge’ over the plan period, or for that matter new views that should be the subject of this section of the Plan, would each have to be subject to the making of a variation to the Plan and cannot be added without due process.

It is submitted that in the interests of meeting Development Plan scope requirements under S10(2)(e) of the Planning and Development Act, 2000 as amended [the Act] that the View Management Framework should manage views and prospects as part of the objectives of Chapter 6 *Green and Blue Infrastructure, Open Space and Biodiversity*, rather than risk having this be conflated with architectural heritage objectives of Chapter 8 *Heritage, Arts and Culture* required to be part of the Plan under S10(2)(f)(g) of the Act. i.e. the view management framework should not undermine the development potential buildings and / or sites that are not protected structures (RPSs), or within ACAs by referring to buildings that do not themselves hold a RPS or ACA status.

Having regard to the above it is specifically submitted that draft plan Strategic Landmark Building no. 6 is “*City Docks Industrial Landmarks: R&H Hall Silo / Odlum’s Mill*”, requires revisiting to either delete ‘R&H Silo’, or clarify in text that it is the R&H Silo site that is a view terminus, rather than the structure itself. In this way, the R&H Silo site can be put to a sustainable reuse, designed in a manner to evoke the silo’s form and prominent scale for a role that promotes the docklands redevelopment.

Odlum’s is RPS ref. PS856 in the Draft Plan as it is in the current Plan. R&H Silo has not been similarly designated, despite being available for RPS record since the inaugural National Inventory of Architectural Heritage (NIAH) complied after the enactment of Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999. The lack of designation of the Silo as a Protected Structure is intentional on the part of Cork City Council given the detailed scrutiny of these issues in the preparation of the South Docks Local Area Plan 2008. On this note, we would request that Cork City Council remove the inclusion of the silo building as key built heritage from figure 10.9 South Docks Drainage Strategy Placemaking and Landscape Concept of the Draft City Development Plan .

The NIAH appraisal notes the visual significance of the building from many parts of the city and that it serves to define the remaining commercial docks area of the city from some distance.

As the Port of Cork are well advanced in their relocation from the city, the commercial dock activity is no longer relevant. This area is to become a new urban quarter that will accommodate a population of c. 25,000 and create 20,000-25,000 jobs.

The replacement of the defunct R&H Hall Silo building with a distinctive building of similar scale and height can and will reflect the utilitarian design and former role of the South Docklands while signifying its importance as an international mixed use regeneration project that includes for the repurposing of the former commercial quays for the crossing of the proposed light rail from the North Docklands and an amenity quayside. It is proposed that this building would be visible during the day and night from many parts of the city.

4.3 Summary of requested review of draft View Management Framework

As noted, it is recognised that as the city becomes more compact and densified, the maintenance, amplification and creation of strategic views and prospects will be a strategic benefit to ensure that growing city delivers a unique cityscape. It is further recognised that the Draft Plan seeks to have a coherent View Management Framework for this purpose.

Having regard to the foregoing, it is however submitted that the View Management Framework requires the following review interventions that include requests for alterations:

- **That Section 6.30 of the Plan be revised as follows, to avoid the Plan stating that the View Management Framework will be subject to update and addition, without due process:**

“6.30

Strategic and local landmark buildings have been identified so that linear views of these buildings can be protected through the management of development. Strategic landmark buildings are those that are widely appreciated due to their visual prominence and the role that they play in helping people to orientate themselves within the City. Local landmark buildings are important within the City’s neighbourhoods due to their local visual prominence. While an illustrative list of local landmark buildings is provided, other local landmark buildings will emerge during the Plan period through the development management process, and where these are identified important linear views to these buildings will need to be taken into consideration.”

- That the schedule of Strategic Landmark Buildings, part of Tables 1 and 2 of View Management Framework at Volume 3 of the Draft Plan be audited to remove buildings that are not Protected Structures. This action is required for the S&H Silo building, which is not a protected structure but lies within the docklands neighbourhood for which urban regeneration is a priority.

Where the authority wishes to keep buildings that are not protected structures within the category of Strategic Landmark Buildings as part of the View Management Framework, it is requested that each be followed by the word 'site' in order to demonstrate that those buildings occupy locations that are associated with protected views but their redevelopment is expected. In this way the requirements for a careful collaborative design approach with the local authority for these locations to maintain the associated view in the future cityscape will be communicated.

- That the View Management Framework map legend symbols at Volume 2 of the Draft Plan match the categories and items names in the View Management Framework Tables at Volume 3 of the Plan.
- That the View Management Framework maps at Volume 2 of the Draft Plan be reviewed to include view directions and nomenclature in order they may be individually identified and audited against the views and prospects scheduled at the View Management Framework Tables at Volume 3 of the Plan.

5.0 Proposed Car Parking Standards

The current Cork City Development Plan sets out a car parking standard of 1 space per 150 sq.m in car parking Zone 2A (Within 500m of Blackpool Station and Kent Station) and 1 space per 100 sq.m for the remainder of South Docklands outside Zone 2A.

It is noted that the City Council are proposing changes to the car parking standards within South Docklands, and Cork City generally, in the emerging Development Plan. In accordance with Table 10.5 of the Draft Plan, O'Callaghan Properties sites are within the South Docks City Transition area and the South Docks Central area. Table 10.5 as indicated below sets out the maximum car parking standards for destination parking on an employee density basis and residential parking on the basis of bedroom numbers.

Firstly, we note that the proposed car parking standards for South Docklands are based on an employee ratio whereby 1 person equates to 16 sq.m of office space. The employment car parking standards for the remainder of the city are based on sqm of development akin to the current plan. In the interest of transparency, we believe that the emerging plan should include a consistent approach to car parking calculation that is easily understood. It is requested that the car parking standards for South Docklands are also based on sqm of proposed development.

Figure 9 Table 10.5 of the Draft Cork City Development Plan 2022-2028

Parking Zones	Destination Parking	Residential Parking (Spaces Per Unit)	
		1 Space Per	1 Bed
North Docks	20 employees (5% provision)	0-0.15	0-0.3
South Docks City Transition	20 employees (5% provision)	0-0.15	0-0.3
South Docks Central	7 employees (14.3% provision)	0-0.2	0-0.4
South Docks East	6 employees (16.66% parking)	0.025	0-0.5

Secondly, our client supports the aims at national, regional and local planning policy levels to reduce dependency on the private car and encourage a shift to public transport to assist Ireland in meeting its CO2 emission reduction targets. However, it must be acknowledged that this shift is not going to occur in the short term as the public transport infrastructure is not yet in place to support such a significant change in transport patterns. The application of car parking standards in the emerging city development plan must address the timeframe of the plan, i.e., to 2028. The alternative sustainable transport modes will not be in place by then.

Our client is gravely concerned with the maximum standard being proposed for destination parking within the South Docks City Transition area which is where they intend to lodge planning applications for mixed use development in the short term. As per Table 10.5, the standard being proposed in this area is 1 no. space per 20 no. employees (this equates to 5% provision).

If car parking standards in the current Development Plan were based on employee density, this would be 1 space per 320 sq.m floorspace.

The corresponding car parking standard in the current plan of 1 space per 100 sq.m would equate to 1 space per 6.25 employees (15% provision). This is over a third of a reduction in car parking provision allowable.

We have prepared a comparative of the proposed standards against current and proposed standards in other Local Authorities (see Appendix 3). We note in particular the comparison between the proposed standards in the Draft Cork City Development Plan and the corresponding standards in adopted and draft Development Plans for Dublin Local Authorities.

The proposed standards for South Docklands in the Draft Cork City Development are almost comparable to Dublin City Centre standards and much more restrictive than either South Dublin or Dun Laoghaire Rathdown.

When comparing the high-capacity public transport infrastructure, Dublin is far more advanced than Cork albeit that there are significant proposals for Cork as the second city. Dublin City has an operational light rail system comprising red, green and cross city routes. Dublin City and the surrounding area is already well served with future high-quality proposals for Metro. It is also noted that bus connects pilots have been implemented in Dublin.

In the current absence of high frequency public transport and adequate park and ride facilities outside the city centre in Cork, the proposed approach to car parking in the draft plan is considered to be premature when many people are forced to commute using the private car as they do not have alternative options to access the city centre. This may create inequity in relation to access to

employment opportunities. The current traffic issues experienced in parts of the city are largely due to the public transport deficiencies and not car parking.

Subsequently, this has the potential to substantially hinder commercial development within the South Docklands when locations within car parking Zones 3 and 4 and in Cork County are likely to be much more appealing for investors.

Until such a time as the above infrastructure is in place, the Cork City Development Plan must allow for a degree of flexibility in the application of car parking standards. An uncompromising approach whereby new development is forced to have a very low level of car parking, could result in commercial investors opting to locate in peripheral locations where they can have more car parking to accommodate employees, or to avoid Cork altogether. This would be very detrimental. The level of car parking to be provided as part of any new development should be assessed on a case by case basis within an overall framework.

We submit that a reduced car parking requirement for new developments be linked to the delivery of the proposed public transport and facilities infrastructural improvements over the lifetime of the 2022-2028 Development Plan. The South Docks ABTA parking standards are appropriate for the longer-term development of the docklands, with a phased approach intended for the roll-out of enhanced public transport services commencing with high frequency bus services and upgrading to Bus Rapid Transit and ultimately Light Rail Transit in the period to 2040.

It is accepted that ABTA car parking standards will become applicable as the docklands develops. However, as highlighted, the existing standard of public transport provision serving the site is limited.

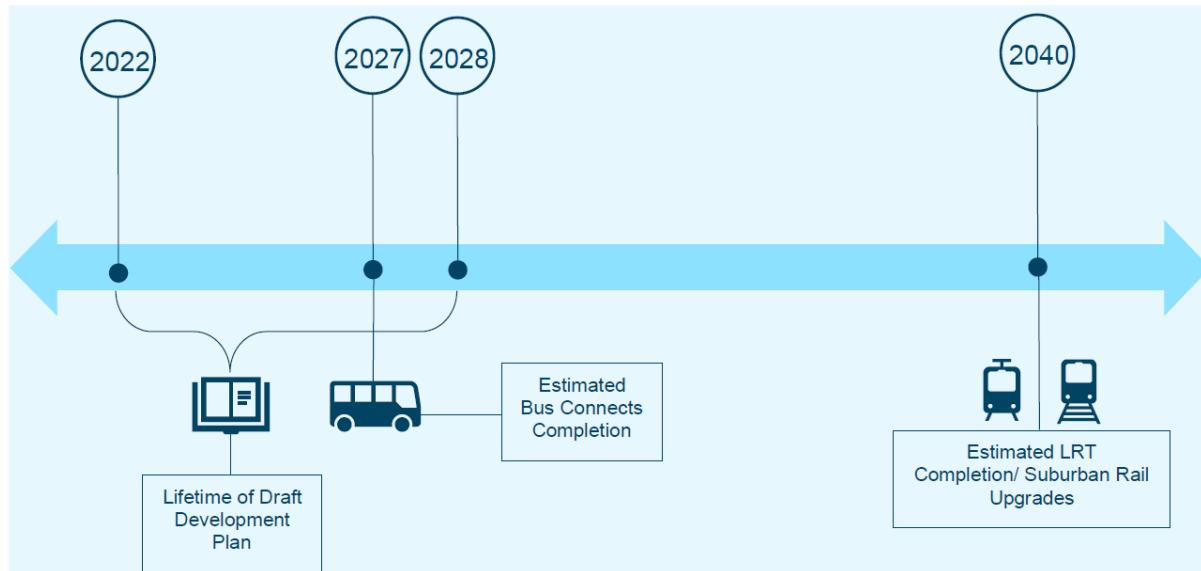
As noted, O'Callaghan Properties is currently exploring design options for its extensive landholding in the South Docks. Our client sees the reduction of car parking over time as public transport alternatives to the private car are delivered as the most realistic way of reducing the need for car parking in the city. **This would be a phased reduction in car parking as the lands are developed commensurate with the likely phasing of improvements to public transport serving the area over the short, medium and long-term. This approach to car parking would mean that the overall parking provision will be consistent with the longer-term aspirations for the area as set out in ABTA, whilst also responding to the improvements to public transport services in the locality.** This approach to car parking has already been considered appropriate in the recent granting of permission for a large mixed use development at the Former Ford Distribution site in South Docks.

In our client's experience dealing with commercial operators elsewhere in the city, including at Navigation Square, the availability of car parking is an important consideration when they are selecting locations for new offices.

This is echoed in the submission prepared by WS Atkins Ireland Limited on behalf of John Cleary Developments to the Draft Cork City Development Plan that raises significant concerns with regard to the car parking standards proposed in Cork City. That submission, which JCD shared with O'Callaghan Properties, assesses the implications of the proposed car parking standards on development in Cork City. One finding is that under the Draft Development Plans, office developments constructed in the Cork County Council area will be serviced with five times more parking than office developments constructed in Zone 4 of the city (which allows for the most car parking). This difference in standards between the County and City Development Plan will likely result in office developments locating outside the city where parking standards are significantly more attractive.

This submission also includes a comparative review of car parking standards in other local authorities which shows that parking standards are more restrictive in the Draft Cork City Development Plan than the Dublin City Council's most restrictive standards for Dublin City Centre, a location with significantly better public transport links than Cork City.

The Atkins submission sets out the proposed timelines for CMAT's public transport infrastructure against the timeline of the emerging Cork City Development Plan. It is clear that the majority of the proposed infrastructure will not be delivered within the lifetime of this Development Plan.

Figure 10 Cork City Public Transport Infrastructure Indicative Timeline

We ask that Cork City Council adopts a flexible approach to car parking in the first phases of development in the South Docklands in the absence of the public transport that is proposed to serve this extension of the City Centre. Car parking for these initial phases of development should be aligned with the current standards in the current plan until the public transport provision is in place and as described above a phased approach to car parking corresponding with the delivery of public transport improvements over the short, medium and longer term

Similar to our own conclusions, the Atkins submission states that the introduction of the excessively restrictive car parking standards is premature given the existing and proposed public transport available during the lifetime of the plan. This in turn could result in unforeseen economic impacts in terms of viability of office developments and for Cork achieving its employment targets as set out in Project Ireland 2040.

6.0 Call for publication of Supporting Documents

It is submitted that the draft Plan makes reference to a number of supporting or companion studies, some of which will directly impact the development management approach for certain City areas.

The Draft Plan and the Strategic Flood Risk Assessment (SFRA) refer to Urban Drainage Strategies as do some of the supporting assessment prepared for the Draft plan e.g. Cork City Green and Blue Infrastructure (GBI) Study (Draft July 2021) refers to both the City Docks and Tivoli Docks Urban Drainage Strategies. It is submitted that these urban drainage strategies are essential to understand, design and build sustainable development and may even have the effect to put blocks of land currently zoned for development beyond use.

Similarly, the Draft Plan refers to the Docklands Area Based Transport Assessment (ABTA) which we understand is in preparation. The outcome of that assessment to even draft level is vital to inform the development strategy for strategic redevelopment areas of the City.

The Urban Drainage Strategies and Area Based Transport Assessment should be published forthwith and form part of the public consultation of the draft Plan.

It is further noted that the Draft Plan refers to the findings of a preliminary hydrogeology study completed as part of the Urban Drainage Strategy. This study was not provided so we can only comment on the associated statement.

It is stated that it will be vital to protect the integrity of the existing aquitard (alluvium) soil layer as part of the proposed redevelopment of the South Docks. The nature of the ground conditions and height of the buildings will require piling, and so the detailing of this in a way which maintains the integrity of the clay layer is vital. Equally, deep excavations for basements should be avoided. *Paragraph 10.119 states that development proposals must demonstrate that piling / structural design avoids penetrating the aquitard soil layer in any planning application.*

Given the nature of the buildings, their height and scale as well as the weak nature of the ground conditions it will be necessary to found the building on the gravel layers. In addition, the land use and densities proposed within the South Docks would suggest that basement construction will be necessary as previously undertaken at other developments in the area including Navigation Square, One Albert Quay and at Penrose Quay. It is clear that the intention of this statement is to protect the vicinity from localised flooding from ground water. During the construction works it will be necessary to penetrate this Aquitard layer in a manner similar to what has been undertaken elsewhere in recent years, but this excavation will be done in a controlled manner and without causing a permanent breach to the aquitard layer.

We would contend that it is not possible to avoid penetrating the Aquitard layer in order to carry out construction works for a building of any significance or mass and that this statement should be amended to reflect this reality.

7.0 Conclusion

Our client, O'Callaghan Properties (OCP) welcomes the opportunity to participate in the plan making process that will shape the future delivery of South Docklands that underpins the successful development of Cork to 2028 and beyond.

Our client has set out a number of specific recommendations within this submission for the consideration of the City Council to be incorporated into the revised Cork City Development Plan.

We trust that this submission is of assistance to Cork City Council and we look forward to its consideration of the above. We request that Cork City Council acknowledges receipt of this submission and include O'Callaghan Properties (info@ocallaghanproperties.com) on any mailing list for development plan preparation updates. Our client would welcome the opportunity to discuss any of the above recommendations in further detail with Cork City Council.

If any further information is required, please do not hesitate to contact us.

Appendix 1

Summary of Volume 3 (Built Heritage) of current and draft Development Plans

CURRENT 2015 – 2021 PLAN		DRAFT 2022 – 2028 PLAN	
SPECIFIC BUILT HERITAGE OBJECTIVES		BUILT HERITAGE OBJECTIVES	
Part 1	Architectural Conservation Areas (ACAs)	Part 1	Architectural Conservation Areas (ACA's)
Part 2	The Record of Protected Structures (RPS),	Part 2	Record of Protected Structures (RPS)
Part 3	the Record of Monuments and Places (RMP),	Part 3	Record of Monuments and Places (RMP)
Part 4	Views and Prospects	Part 4	View Management Framework
Part 4 Content		Part 4 Content	
Table 1	Protected Linear Views to Landmark Buildings	Table 1	Panoramic Views
	14 no. landmark buildings		5 no. Strategic Viewing Locations Referring to: - Strategic Linear Views - Strategic Cityscape Views, and - Strategic Landscape Views
Table 2	Protected Views within Panoramas	Table 2	Linear Views of Landmark Buildings: Strategic Landmarks and Local Landmarks, Strategic Landmark Buildings
	11 no. panoramic viewpoints		12 no. Strategic Landmark Buildings are recorded. (nos. 6 and 11, record more than one building).
Table 3	Protected River Prospects	Table 3	Local Landmark Buildings
	15 no. viewing locations (and directions)		18 no. Local Landmark Buildings
Table 4	Landscape & Townscape Views	Table 4	City Hinterland Views and Prospects for Protection
	14 no. viewing locations (and directions as the views are named)		7 No. Protected Linear Views are recorded with the prefix 'HV'.
Table 5	Approach Road Views - National Primary Routes		
	5 no. viewing locations		
Table 6	Approach Road Views - Old City Approach Roads		
	9 no. viewing locations		
Table 7	Views and Prospects for Protection		
	3 No. Protected Linear Views to Landmark Buildings 4 no. Protected River Prospect Viewing Locations 2 no. National Primary Route Viewing Locations		

Appendix 2

Draft Plan, View Management Framework Tables 1 to 4, Volume 3 for the south docklands area.

Panoramic Views, Table 1

Recording 5 no. Strategic Viewing Locations. One of the five locations is the Port of Cork consisting of the promontory at the apex of Anderson's Quay and Custom House Quay. The record of the Port of Cork Strategic Viewing Location is extracted below.

Strategic Location	Viewing	Strategic Linear Views	Strategic View	Cityscape	Strategic View	Landscape
Port of Cork						
	Kent Station Goods Depot					
	Saint Luke's Church					
	Marina ESB Power Station Chimney					
	Odlums					
	R&H Hall Silo					

Linear Views of Landmark Buildings: Strategic Landmarks and Local Landmarks, Table 2 – Strategic Landmark Buildings

Here, 12 no. Strategic Landmark Buildings are recorded. It is noted that nos. 6 and 11, record more than one building.

At no. 6 is "City Docks Industrial Landmarks: R&H Hall Silo / Odlum's Mill" as follows:

No.	Strategic Landmark Building	Viewing Location of Linear Views of Special Amenity
Port of Cork		
6.	City Docks Industrial Landmarks: R&H Hall Silo / Odlum's Mill	<ul style="list-style-type: none"> Lower Glanmire Road R&H Hall Silo / Odlum's Mill Water Street Kennedy Spine (proposed)

Table 3 – Local Landmark Buildings

18 no. Local Landmark Buildings are recorded, none of these occur within the land unit the subject of this submission.

Table 4 - City Hinterland Views and Prospects for Protection

7 No. Protected Linear Views are recorded with the prefix 'HV'.

Appendix 3

Local Authorities Comparative Car Parking Standards

Local Authority Development Plan	Offices, Enterprise and Employment Car Parking Standards
Draft Cork City Development Plan 2022 <i>South Docklands City Transition Area</i>	1 space per 20 no. employees (5% provision)
Adopted Cork City Development Plan 2015 <i>South Docklands (Zone 2A and 2B)</i>	1 space per 150 sq.m (gross) 1 space per 100 sq.m (gross)
Draft Cork County Development Plan 2022	1 space per 17 sq.m + 10% of staff parking for visitors
Cork County Development Plan 2014 <i>Cork City North Environs</i>	1 space per 25 sq.m + 10% of stall parking for visitors
<i>Rest of Cork County</i>	1 space per 17 sqm + 10% of staff parking for visitors
Dublin City Development Plan 2016 Parking Zone 1 is generally within an inner city location where transport corridors intersect, or that has significant interchange potential. Parking Zone 2 occurs alongside transport corridors	1 space per 400 sq.m GFA (Gross floor area) 1 per 1 space per 200 sq.m GFA
South Dublin Development Plan 2016 Zone 1 – General rate throughout the County Zone 2 - 2 (Non-Residential): More restrictive rates for application within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).	1 space per 50 sq.m GFA 1 space per 75 sq.m GFA
Draft South Dublin Development Plan 2022 Zone 1 – General rate applicable throughout the County. Zone 2 – (Non Residential): More restrictive rates for application within town and village centres, within 800 metres of a train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).	1 space per 50 sq.m GFA 1 space per 75 sq.m GFA
Dún Laoghaire-Rathdown Development Plan 2016 <i>General standards</i>	1 space per 50 sq.m GFA to include parking for visitors

<p><i>Designated along public transport corridors - This applies to developments located within a 1km catchment of a Priority 1 Quality Bus Corridor , a Luas, Bus Rapid Transit or DART station/stop and within a 500m catchment of an existing bus priority scheme</i></p>	<p>1 space per 100 sq.m GFA to include parking for visitors</p>
<p>Draft Dún Laoghaire-Rathdown Development Plan 2022 (4 proposed zones total)</p> <p>Zone 1 – This zone generally comprises the Major Town Centre areas of Dún Laoghaire and Dundrum together with the Blackrock District Centre area. These are areas, which are generally characterised by:</p> <ul style="list-style-type: none"> - Access to a high level of existing and planned public transport services (rail and bus) with good interchange potential. -A high level of service accessibility, existing and planned, by walking or cycling. -A capacity to accommodate high density retail, office and residential developments. <p>Zone 2 –</p> <p>These are areas, which are generally characterised by:</p> <ul style="list-style-type: none"> -Access to a good level of existing or planned public transport services. -A good level of service accessibility, existing and planned, by walking or cycling. -A capacity to accommodate a higher density of development than surrounding areas <p>*Includes areas within walking (5-10 minutes) bands/ catchments of proposed quality bus corridors</p>	<p>1 space per 200 sq.m GFA</p> <p>1 space per 150 sq.m GFA</p>
<p>Fingal Development Plan 2017</p> <p>Zone 1 relates to developments within 800m of a QBC or high quality bus service, or 1600m of an existing or planned Luas/DART/Metro/Rail station or within an area covered by a Section 49 Scheme, or in lands zoned Major Town Centre. Zone 2 relates to all other areas in the County</p>	<p>Offices General –</p> <p>1 space per 30 sq.m</p> <p>Reduce by 50% near public transport, metro economic corridor, major town centre, town centre</p>
<p>Draft Limerick Development Plan 2022</p> <p>Zone 1 City Centre, Central and Accessible Locations</p> <p>Zone 2 Intermediate Urban Locations/ Transport Corridors</p> <p>Zone 3 Suburban Edge</p>	<p>1 space per 200sqm</p> <p>1 space per 150sqm</p> <p>1 space per 150sqm</p>
<p>Limerick City Development Plan 2010</p> <p>Zone 1 Central Core</p> <p>Zone 2 Outer Core:</p>	<p>1 space per 50 sqm</p> <p>1 space per 35 sqm</p>

Between Mallow Street & Cecil Street. o Between Denmark Street & John's Street. o Between Sexton Street & William Street. o Gerald Griffin Street & Mulgrave Street. Zone 3 Suburban	1 space per 25 sqm
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*Draft Development Plans have been highlighted

Appendix 4

Henry J Lyons Comparative Review

Henry J Lyons

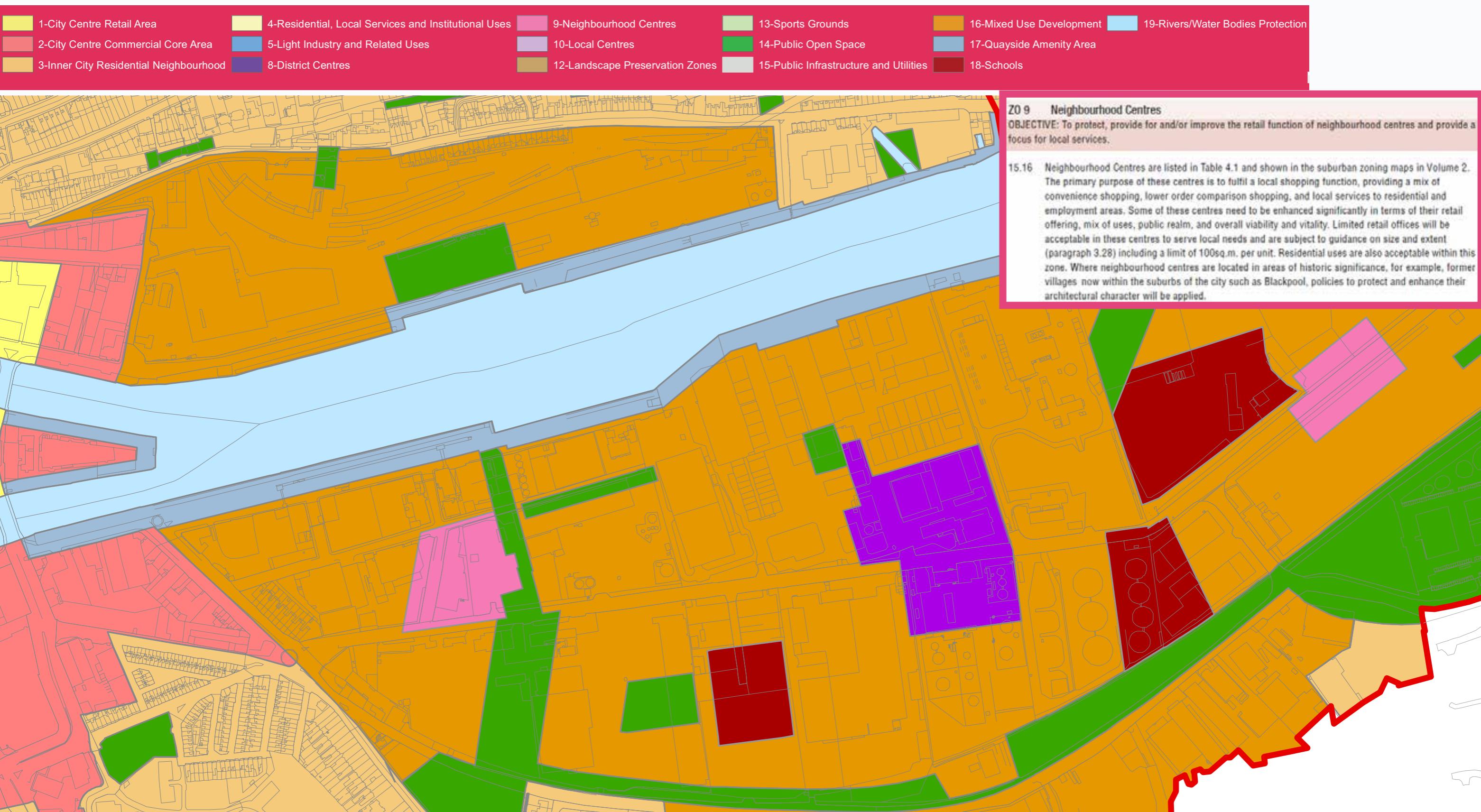
Cork South Docks

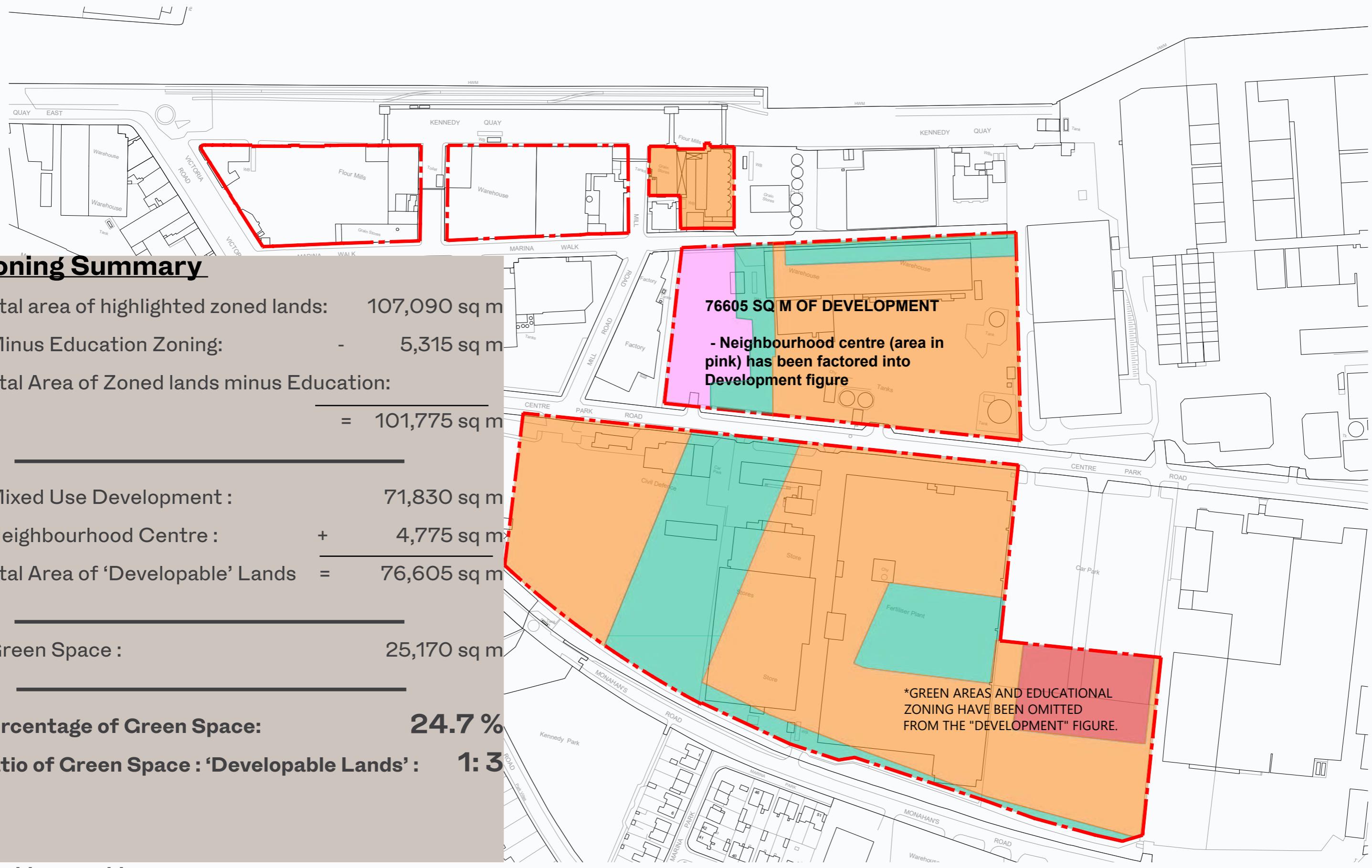
2015-21 VS. 2022-28 DEVELOPMENT PLAN
ZONING COMPARISON STUDIES



October 2021



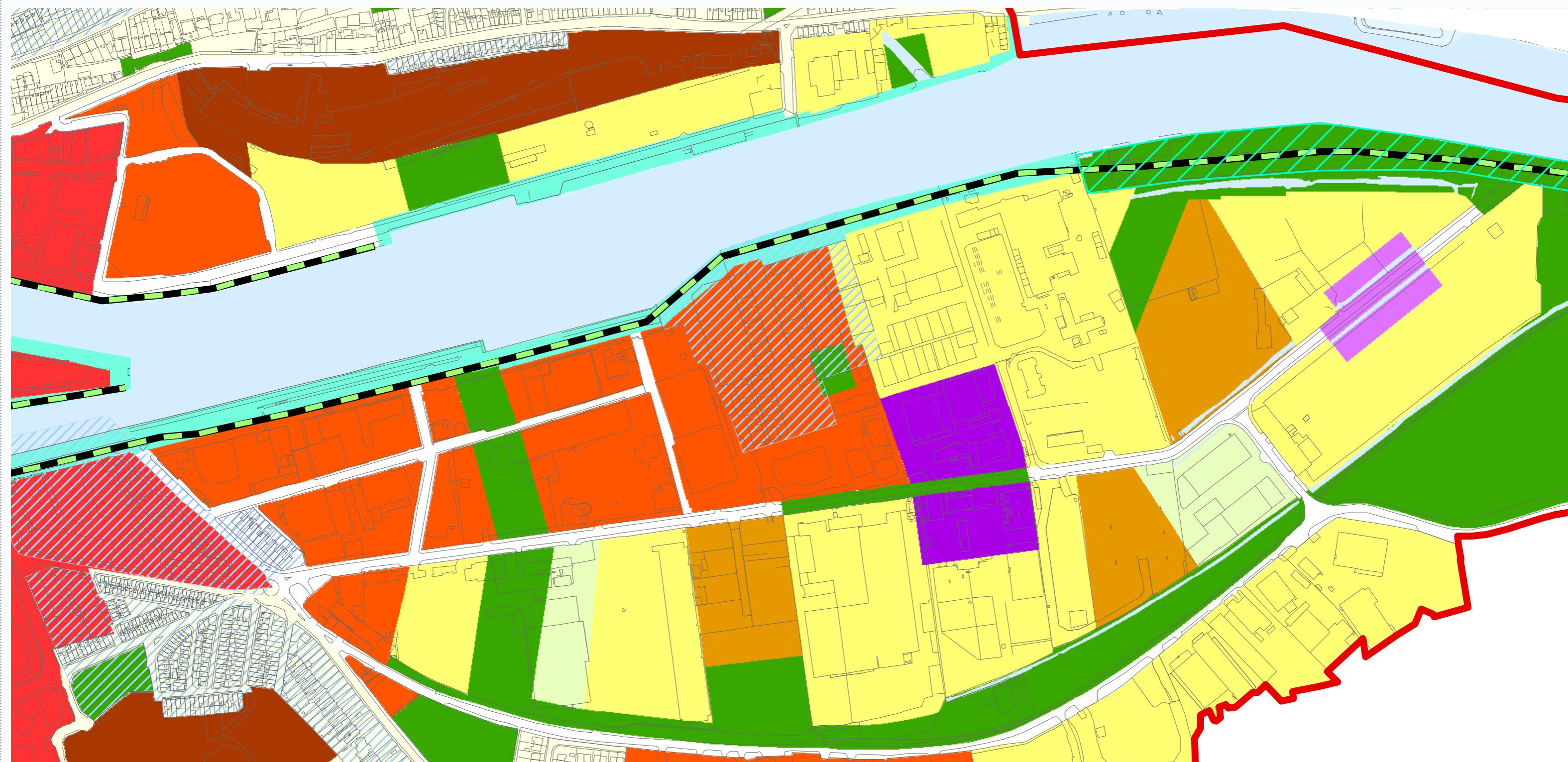


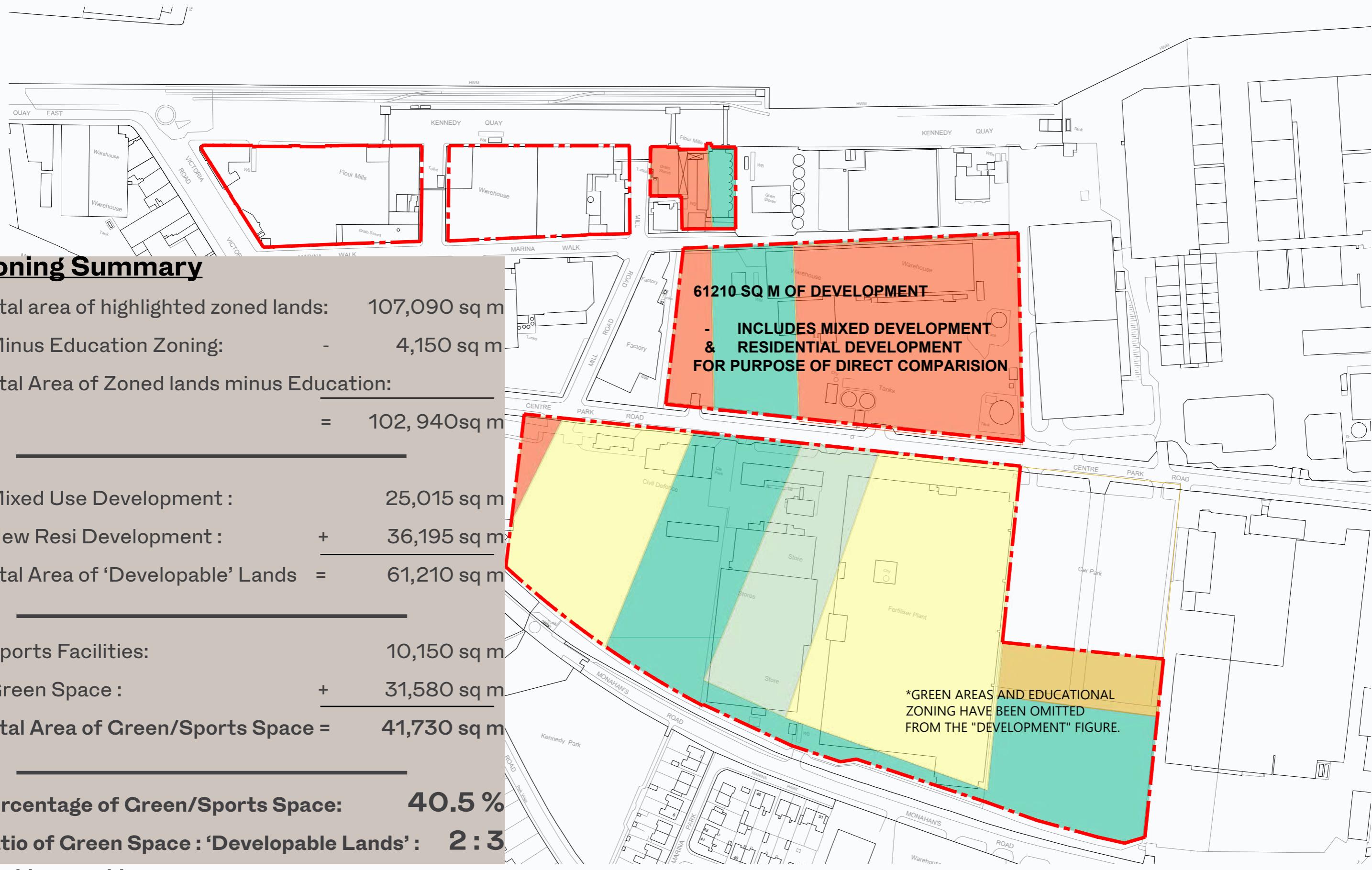


Masterplan

2022-28 Development Plan Zoning Map

Walkways & Cycleways	ZO 01 Sustainable Res Neighbourhoods	ZO 06 City Centre	ZO 13 Education	ZO 17 Sports Grounds and Facilities
Area of High Landscape Value	ZO 02 New Res Neighbourhoods	ZO 08 District Centres	ZO 14 Institutions and Community	ZO 18 Landscape Preservation Zones
Proposed ACA	ZO 04 Long Term Strategic Regeneration	ZO 09 Neighbourhood and Local Centres	ZO 15 Public Infrastructures and Utilities	ZO 19 Quayside Amenity
Existing ACA	ZO 05 Mixed Use Dev	ZO 10 Light Industry & Related Uses	ZO 16 Public Open Space	





Summary

Summary of Development Area Lost on OCP Lands:

2015-2021 Total Area of 'Developable' Lands:	76,605 sq m
2022-2028 Total Area of 'Developable' Lands:	- 61,210 sq m
Total	= 15,395 sq m

Summary of Percentage of Green Space on OCP Lands:

2015-2021 Development Plan Zoning Map:	24.7%
2022-2028 Development Plan Zoning Map:	40.5%

Summary of Ratio of Green Space : 'Developable' Lands:

2015-2021 Development Plan Zoning Map:	1 : 3
2022-2028 Development Plan Zoning Map:	2 : 3