

Development Plan Submission
Strategic and Economic Development
Cork City Council
City Hall
Anglesea Street
Cork
T12 T007

Monday, 4th October 2021
[By Online submission]

-: CORK CITY DRAFT DEVELOPMENT PLAN 2022 – 2028:-

Dear Sir/Madam,

RE: SUBMISSION TO THE CORK CITY DRAFT DEVELOPMENT PLAN 2022 – 2028 IN RESPECT OF LANDS AT R852, LOUGHMAHON TECHNOLOGY PARK, MAHON, CORK

Lidl Ireland GmbH – Site Specific Zoning Policy Submission to provide for specific convenience use(s) as part of the *ZO 5 – Mixed-Use Development Zoning*, associated with the Subject Lands at Loughmahon Link Road [R852], Loughmahon Technology Park, Mahon, Cork City

1.0 INTRODUCTION

The Planning Partnership, The Coach House, Dundanion, Blackrock Road, Cork City are instructed by **Lidl Ireland GmbH**, Head Office, Main Road, Tallaght, Dublin 24, to prepare this *Site Specific Submission* in relation to the ongoing Cork City Development Plan Review process and the publication of the subsequent *Cork City Draft Development Plan 2022-2028*.

1.1 Focus of the Submission

The purpose of this submission is to seek the inclusion of **Convenience Retail** use within the **Zo 5 – Mixed-Use** Zoning Objective within the *Cork City Draft Development Plan 2022 – 2028*, and that such be reflected/presented within the new *Cork City Development Plan 2022 – 2028*.

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective for **Zo 5 – Mixed-Use Development** land use zoning is to provide and promote a dynamic mix of residential and other uses which will interact with each other, to ensure the creation of a vibrant and sustainable urban area. Subject to the key retail tests in terms of the *Retail Planning Guidelines* (2012), the location of new Foodstores should be promoted to complement the fulfilment of the local shopping function.

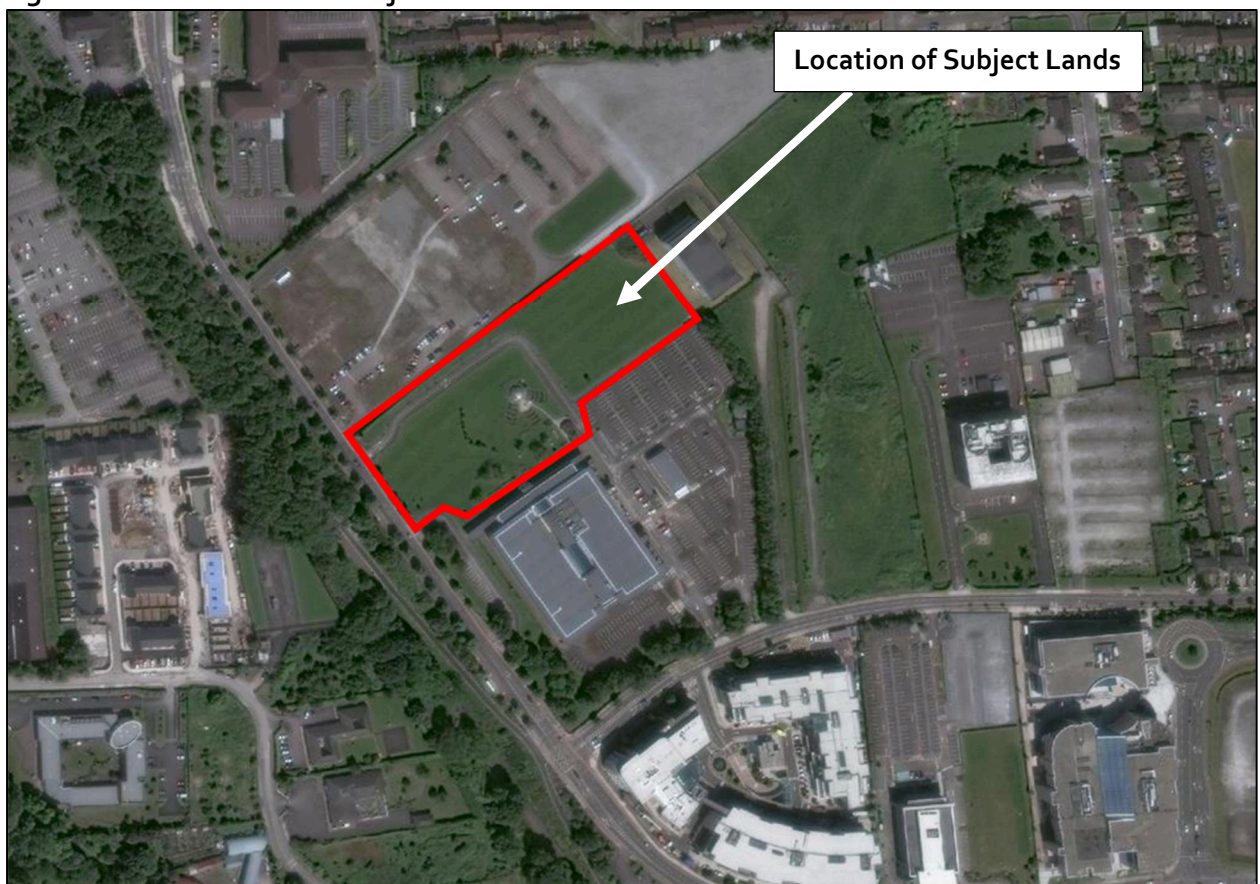
In terms of the *Retail Planning Guidelines* (2012), new convenience space should be accommodated in areas where such need can be demonstrated through the key retail tests:

- Justifying Need;

- Impact;
- Sequential Test; and
- Ensuring that the development is of an Appropriate Scale (that such additional space can be accommodated).

The location and extent of the subject lands are identified within **Figure 1.1** below.

Figure 1.1: Location of the Subject Lands



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership, October 2021

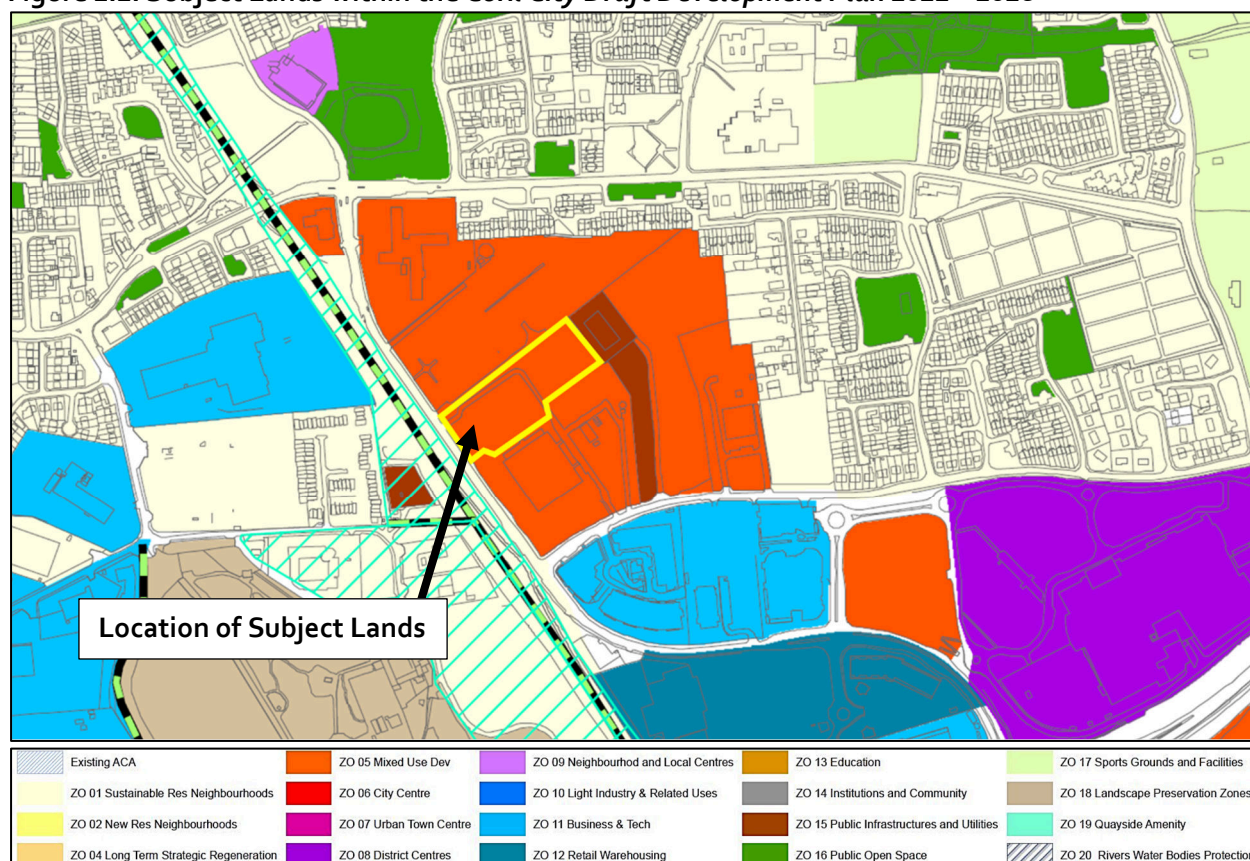
1.2 Executive Summary: *Our Request*

We request that paragraph **ZO 5.2** under the **ZO 5 – Mixed-Use Development** zoning objective of the *Cork City Draft Development Plan 2022 – 2028* be amended to **include for Convenience Retail** use as a permissible use within future Mixed-use Development Proposals on the Subject Lands.

Additional text is identified in **red**, and deleted text identified in **blue** with paragraph **ZO 5.2** to read as follows:

ZO 5.2:

*The range of permissible uses within this zone includes residential, general offices, local services **including local convenience shops**, conference centre, education, hospital, hotel, commercial leisure, cultural uses, civic institutions, childcare services, local medical facilities, business and technology / research uses and community and civic uses. The range and scale of uses proposed must be commensurate to the scale of the zone.*

Figure 1.2: Subject Lands within the *Cork City Draft Development Plan 2022 – 2028*

Source: *Cork City Draft Development Plan 2022 – 2028*, Zoning Map – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

2.0 NATIONAL AND LOCAL PLANNING CONTEXT

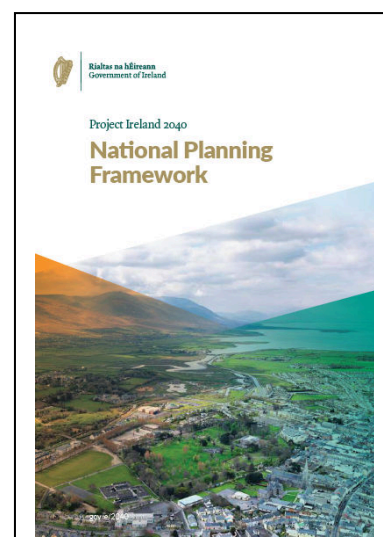
The following relevant extracts from national and local policy supports the current submission.

2.1 National Planning Framework – Project Ireland

NPO 4: *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

NPO 5: *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

NPO 6: *- Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

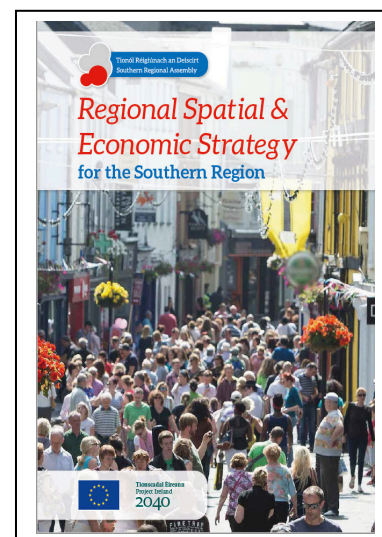


NPO 11: - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPO 28: - Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

2.2 Regional Spatial Economic Strategy for the Southern Region

RPO 2 Planning for Diverse Areas: The RSES recognises the strategic role played by all areas, both urban and rural, in achieving the set regional and national targets and objectives. The RSES supports sustainable enterprise growth, services, physical and social infrastructure investment and the sustainable growth of all communities in the Region. The overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region's strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage.



RPO 9: It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including: Water services, digital, green infrastructure, transport and sustainable travel, community and social, renewable energy, recreation, open space amenity, climate change adaptation and future proofing infrastructure including flood risk management measures, environmental improvement, arts, culture and public realm.

RPO 10 Compact Growth in Metropolitan Areas: To achieve compact growth, the RSES seeks to:

- a. Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.
- b. Identify strategic initiatives in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP. Such strategic initiatives shall comply with MASP Goals to evolve innovative approaches for all MASPs. Initiatives may include:
 - Support the creation and role of Active Land Management Units with a remit to focus on the metropolitan areas and compact growth targets;
 - Partnerships with the Land Development Agency to progress housing and employment delivery in city and town centres, focusing on co-ordinating and developing large, strategically located, publicly owned land banks, reducing vacancy and increasing regeneration of key sites;
 - Support the role of the local authority as a development agency to kick start regeneration processes;

- *Seek design competitions for key strategic sites that deliver greater density, mixed uses where appropriate, sustainable design, smart technology, green infrastructure and public gain through good design;*
- *The identification of public realm and site regeneration initiatives which combine, on an area wide basis, opportunities for regeneration of private owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm areas; and*
- *Creation of continually updated databases identifying brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets. Through active land management initiatives, identify strategic locations for residential growth responding to the growth targets and achievement of compact growth and employment growth.*

RPO 55 Retail: *It is an objective to:*

- Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations in regeneration / public realm projects and other measures;*
- Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category;*
- Prepare Retail Strategies in accordance with the Retail Planning Guidelines including Joint Retail Strategies where applicable. Proposed public realm or urban regeneration projects should be assessed for potential impacts on the receiving environment including capacity of existing services at project level. Where public realm or urban regeneration projects would significantly increase shopper/visitor numbers, planning authorities should ensure that projects include sustainable management of increased demand for access to city/town centre locations.*

RPO 62 Location for Employment Development: *It is an objective to: b- Identify future locations for strategic employment development having regard to accessibility by sustainable transport modes and environmental constraints.*

2.3 Mahon Local Area Plan 2014

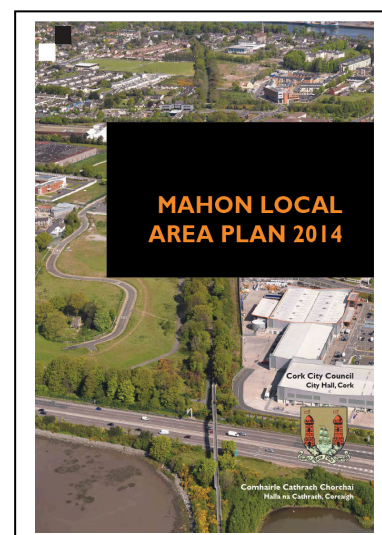
4.2.5 Sub-Area 4: Lough Mahon Technology Park Land use strategy: *Zoning objective definitions are set out in the current Cork City Development Plan. The vision for the area is to see its continued transformation from low density employment / greenfield sites to higher density employment uses supported by necessary local services and community services to meet the needs of those working in the area, with buildings grouped to frame and improve the qualities of the streets - Mahon Link Road, Saint Michael's Drive and Skehard Road. For urban design reasons the preferred location for higher density development will be along the main road frontages.*

A number of uses will be open for consideration within the sub-area in addition to the primary land use objective of business and technology use. Live ground floor uses on key frontages with a strong relationship to the public realm will be considered favourably providing they are of a scale and use that conform to local services uses (as defined in the Development Plan). Thus local shopping, retail services, commercial leisure and community services will be considered favourably. The priority for new active street frontage will be the proposed building at the corner of Mahon Link Road and Saint Michael's Drive.

Objective MSA4: It is an objective of the City Council to seek to ensure that the Lough Mahon Technology Park is developed to provide a high quality working and urban environment.

The following projects will be promoted:

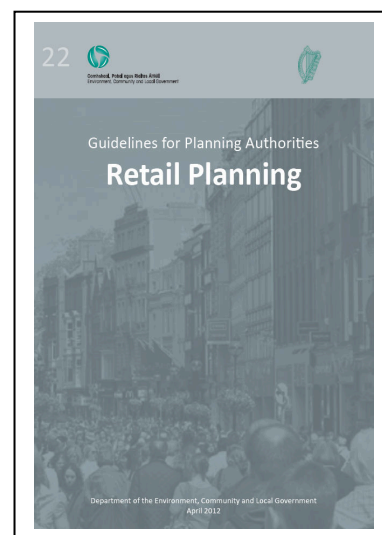
- To integrate the precinct into its context by means of the provision of additional connections and access points.
- To upgrade existing streets and provision of new streets and spaces to a high standard of public realm design, including consistent pedestrian / cycle friendly layout and significant tree planting;
- The development of sites in a manner that ensures plot ratio targets are not exceeded and streets are fronted onto by buildings.



2.4 Retail Planning Guidelines (2012)

2.5.3 Competitiveness in the Retail Sector: Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity.

The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.



2.5.4 Encouraging Sustainable Travel: While the private car tends to be attractive for activities such as more substantial convenience goods shopping or bringing home bulky goods, careful location of retail developments and attention to detail in terms of how they are connected by footpaths and cycle facilities to surrounding areas can substantially boost trips on foot or bicycle for smaller purchases and make a substantial difference in encouraging smarter travel in line with the Smarter Travel strategy.

2.5.5 Retail Development and Urban Design: Quality design aims to create attractive, inclusive, durable, adaptable places for people to work in, to live in, to shop in, or pass through.

Planning authorities should promote quality design in retailing in their development plan and/or retail strategies and then implement this through the development management process. This is of particular importance for retail development because of the dominant visual and use role it plays in a city, town or village streetscape.

3.3 Development Plans and Retailing: The function of the development plan is to establish an overall strategy for the proper planning and sustainable development of its area.

Specifically in relation to retailing, the development plan must be:

- *Evidence-based through supporting analysis and data to guide decision making;*
- *Consistent with the approach of these guidelines; and*
- *Clear and concise with regard to specific objectives and requirements.*

5- Set out strategic guidance on the location and scale of retail development to support the settlement hierarchy, including where appropriate identifying opportunity sites which are suitable and available and which match the future retailing needs of the area;

7 -Mobility management measures-- that both improve accessibility of retail areas while aiming to develop a pedestrian and cyclist friendly urban environment and vibrant street life.

4.11.6 Local Retail Units:

Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.

2.5 Cork City Draft Development Plan 2022 – 2028

Objective 2.8 The 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.

Objective 2.10 Mix of uses: Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.

Objective 7.36 Vibrant and Mixed-Use Centres:

- a- To encourage a vibrant mix of uses, while retaining a healthy mix of retail uses within the designated centres and ensure they appropriately serve their population catchments.
- b- To invest in and activate the public realm, while promoting accessibility and encouraging sustainable modes of transport as a means to travel to designated centres. This would encourage multi-purpose shopping, business and leisure trips as part of the same journey.



10.328: Mahon is a well-connected, mixed-use suburb located within a 15-minute cycle from the City Docks and a 20-minute cycle from the city centre. It is a vibrant neighbourhood with a range of residential communities, businesses and community facilities. It accommodates a zoned District Centre that includes the Mahon Point Shopping Centre and adjoining retail park. The Core Strategy identifies Mahon as an area for growth consolidation and enhancement by providing a mix of new neighbourhood uses in suitable and underutilised locations.

Objective 10.85:

- To support the development of Mahon as an area for growth consolidation and enhancement by providing a mix of new neighbourhood uses.
- To support the sustainable development of the District Centre as a mixed-use centre in line with retail and other relevant objectives.
- To support the regeneration of the Avenue de Rennes Neighbourhood and Local Centre as a mixed-used development.
- To support the development of a library and youth facility to serve the Mahon and Blackrock areas to meet the growing needs of these communities. Cork City Council will work with stakeholders to realise these community assets.

2.6 Inclusion of Convenience Retail Use within the ZO 5 – Mixed-Use Zoning Objective is consistent with the Proper Planning and Sustainable Development within Mahon

As detailed within the *Cork City Draft Development Plan 2022 – 2028*, the objective and vision for **ZO 5 – Mixed-Use Development** land use zoning is:

Zoning Objective 5:

To provide and promote a mix of residential and other uses to ensure the creation of a vibrant and sustainable urban area.

ZO 5.1:

This zoning objective facilitates the development of a dynamic mix of uses which will interact with each other creating a vibrant urban area with residential, employment and other uses. A vertical and horizontal mix of uses should occur where feasible, including active ground floor uses and a vibrant street frontage on principle streets.

ZO 5.2:

The range of permissible uses within this zone includes residential, general offices, local services, conference centre, education, hospital, hotel, commercial leisure, cultural uses, civic institutions, childcare services, local medical facilities, business and technology / research uses and community and civic uses. The range and scale of uses proposed must be commensurate to the scale of the zone.

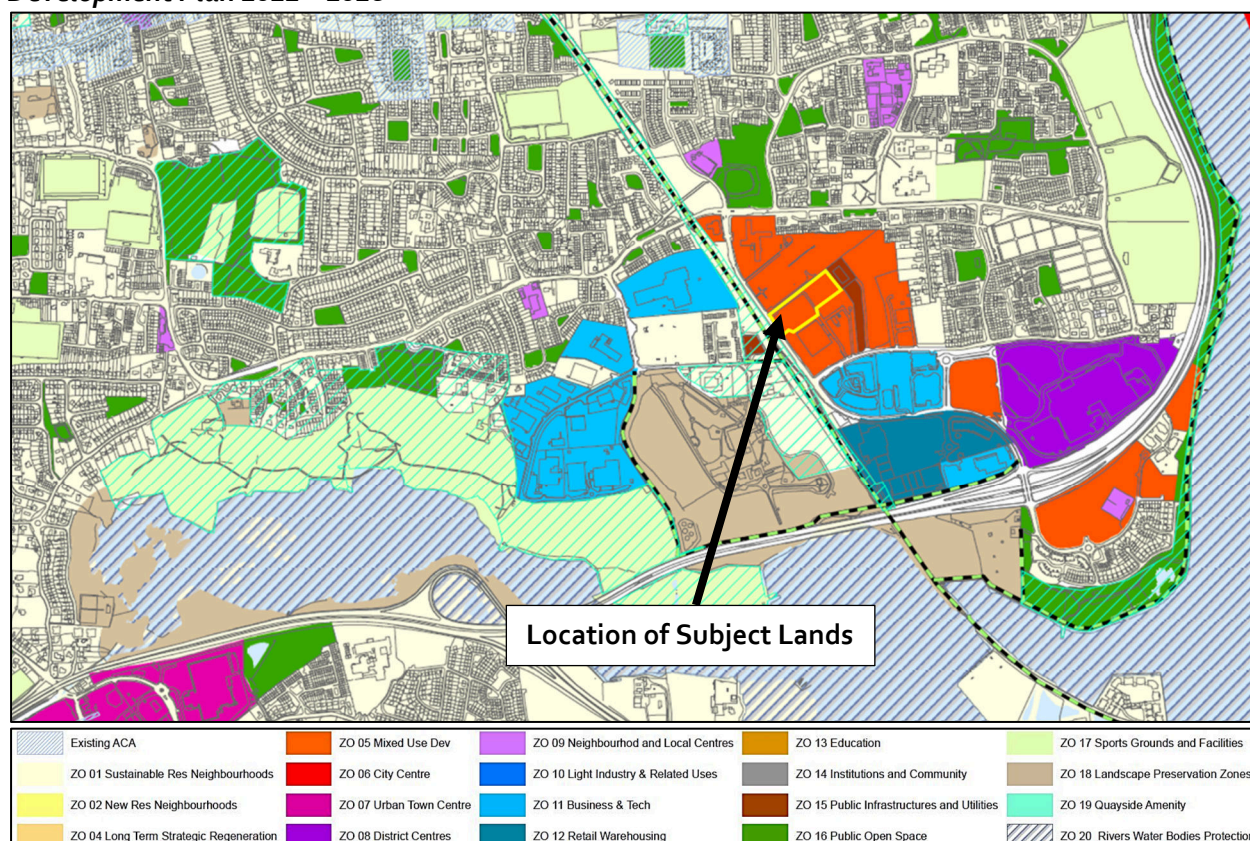
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The subject lands now proposed to be zoned as **Mixed-use Developments**, zoned 7 - *Business and Technology* in the Current City Development Plan, are surrounded by a wide range of other zoned land such as *Business and Technology; Sustainable Residential Neighbourhoods; Public Infrastructure and Utilities; Retail Warehousing; and Landscape Preservation Zones*, all within a 15-minute walking distance from the subject lands as illustrated in Figure 2.1 below.

Figure 2.1: Subject Lands within the wider area of Zoned Lands proposed within *Cork City Draft Development Plan 2022 – 2028*



Source: *Cork City Draft Development Plan 2022 – 2028*, Zoning Map – extracted, annotated and reproduced by The Planning Partnership under OS Licence No. AR0114721

Facilitating a real mix of uses, including convenience use, to be facilitated as part of the overall mixed use development of the subject lands which are in close proximity to existing residential neighbourhoods is consistent with the proper planning and sustainable development of Mahon Area.

3.0 CONCLUSION

Having regard to the foregoing and noting the object of the 15-minute walking distance to be served by mixed use facilities, the inclusion of **Convenience Retail** as a permissible use within future Mixed-use Development Proposals on the Subject Lands, as part of the **ZO 5 – Mixed-Use Development** zoning objective and vision of the *Cork City Draft Development Plan 2022 – 2028*, in close proximity to existing residential neighbourhoods, is consistent with the proper planning and sustainable development of Mahon Area.

The development of multiple Foodstores (i.e. different operators to facilitate local competition and consumer choice) should be encouraged which will add to the vitality and viability of the Mahon Area, enhancing the provision of a range of retail functions and provide a greater diversity.

Notwithstanding our client's successful operations in Cork to date, it is considered appropriate at this juncture to seek to update planning policy with regard to convenience shopping facilities, in line with the provisions of the *Retail Planning Guidelines (2012)*, and to ensure that there is a balance in the provision of uses being provided in specific locations by allowing competitiveness to occur by ensuring that a Retail Impact Assessment is properly carried out.

Should you have any queries or require any further information in relation to the above please do not hesitate to contact me.

Yours faithfully



Wessel Vosloo
Principal
The Planning Partnership