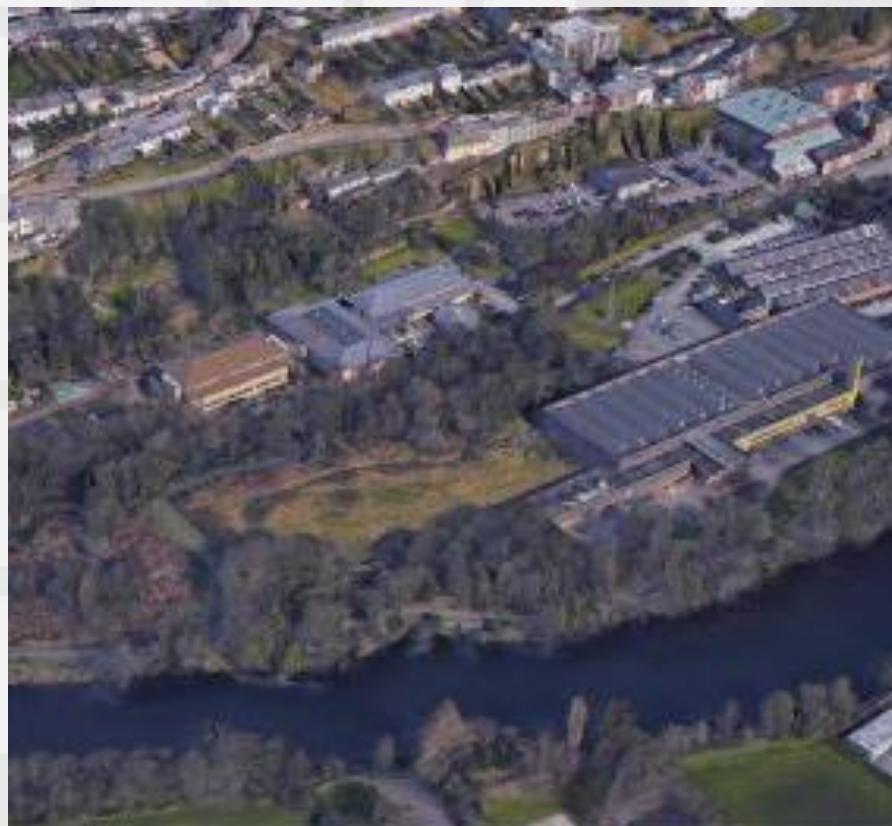


Submission to Draft Cork City Development Plan

Re: North Mall Campus Lands

on behalf of University College Cork & Mercy University Hospital

October 2021



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Summary

1.1 Submission Request

University College Cork (UCC) and Mercy University Hospital (MUH) make this joint submission to the draft Cork City Development Plan and request that the Cork City Development Plan:

- A. **Designate the North Mall Campus as a Strategic Employment Site**, suitable for the development of further education, health, and research employment opportunities, with potential to accommodate approximately 1,250 FTE jobs¹.
- B. Review the section on Key Employment Types provided in Chapter 7 and include a specific category related to Health, Education, and Innovation. This category of employment is a major employer in the City and the growth of the sector is vital to the City's economic success. The sector is too significant to be considered a sub-category of 'offices'.
- C. Include additional text in chapter 7, under the heading 'Support Innovation, Research and Development – An Innovation City', to **support the development of the North Mall Campus for Health, Education and Innovation uses, as part of a joint development between the University College Cork and Mercy University Hospital**, in line with an agreed masterplan. The North Mall campus is a key site with growth potential along the emerging 'Innovation Corridor' outlined in section 7.25. Its development should be explicitly supported in line with the existing provisions of the 2015 Cork City Development Plan and Cork MASP Policy Objective 2.
- D. **Explicitly identify the North Mall Campus at part of the emerging Innovation Corridor in Objective 7.3c.** The North Mall Campus is identified in the Innovation Corridor mapping of the supporting document 'Cork City Strategic Employment Location Study', but this is not reflected in Objective 7.3c.
- E. Revise the Density and Building Heights Strategy to **include the North Mall Campus lands within the Primary Urban Corridor** and Principle Towns category. The categorisation of the lands as 'Inner Urban Suburban' is inappropriate given its development potential and existing urban context.
- F. Review the View Management Framework, map 3 to **remove the Protected View from St Vincent's Sunday's Well to St Finbarre's Cathedral**, as it is inappropriate in the context of growth objectives for Cork and existing development which already impacts the view. **The appropriateness of other protected views should also be assessed.**

¹ See section 4.1 for discussion.

The rationale for this submission request is detailed in section 4, while section 3 provides strategic context for UCC's and MUH's objectives and discusses the existing national, regional and local planning policy framework.

1.2 Structure of submission

This submission is structured as follows:

1. Summary & Submission Request
2. Introduction
3. Strategic Context
4. Rationale

2. Introduction

McCutcheon Halley Planning Consultants have been commissioned by University College Cork (UCC) and Mercy University Hospital (MUH) to make this joint submission to the draft Cork City Development Plan. The submission is made in respect of UCC and MUH's joint masterplan for the North Mall Campus, as illustrated in Figure 1².

Each institution will be making a separate submission to the draft review process related to wider strategic issues.

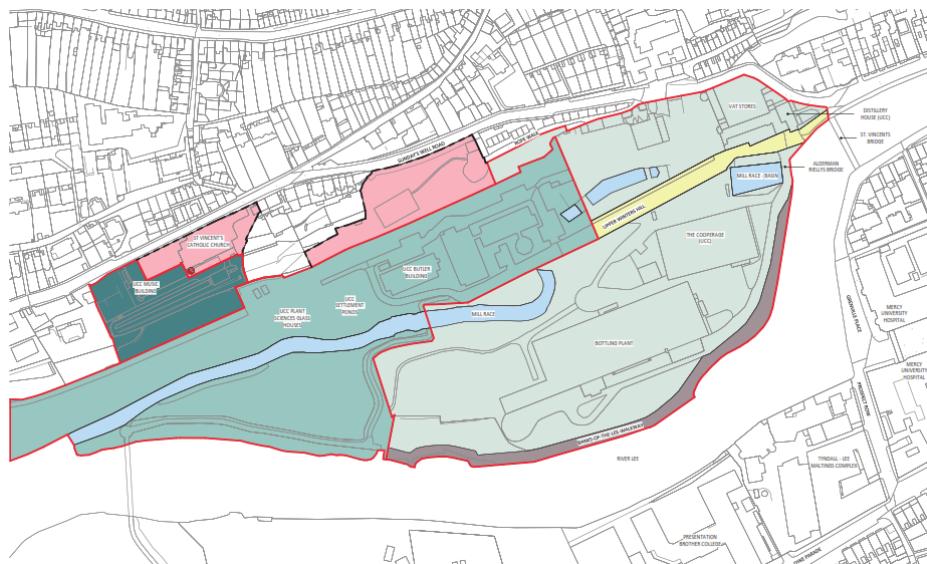


Figure 1: North Mall Campus lands

This submission is informed by UCC & MUH's joint Preliminary North Mall Campus Masterplan (copy attached).

In summary the Preliminary North Mall Campus Masterplan details how the shared vision of UCC & MUH for development of the site as **a world-class University and Hospital Campus** can be achieved, while respecting and enhancing the site's assets, and delivering the planning policy objectives for the site which discussed in section 3.4.3.

² Refer to Figure 1.1 North Mall Campus Masterplan.

3. Strategic Context

3.1 Shared Vision

The shared vision and strategic objectives of UCC and MUH for the North Mall Campus are set out in section 4 of the Preliminary North Mall Campus Masterplan. In summary the shared vision is:

- To develop the North Mall Campus site into a world-class University and Hospital campus, which supports and reinforces the outstanding reputation of the two institutions and delivers quality modern and functional services and facilities that will benefit Cork City and the wider region.
- To provide an opportunity for the integration of health and learning functions of the two institutions to provide mutual benefits.
- To develop the former industrial site to provide an attractive extension of Cork City Centre.
- To enhance the natural environment of the North Mall Campus site and to provide a recreational amenity for residents of Cork.
- To capitalise on the history of the North Mall Campus site and its architectural heritage and to set a new standard for contemporary architectural and landscape design in Cork.
- To integrate the site into Cork's movement network, providing safe and convenient pedestrian and cycle routes to and from destinations in the west of the city centre.

3.2 UCC – Strategic Objectives

UCC is ambitious in its objectives for growth and world leading innovation, as detailed in its Strategic Plan 2017 to 2022, supporting the national Higher Education Strategy and Project Ireland to 2040. It aims to grow its student numbers to 23,000 by 2022 and to continue to grow in line with demographic demands thereafter. To accommodate this growth UCC plans to increase its building stock by 20% and the expansion of the North Mall Campus is a core element of the university's expansion plans. UCC estimate that they will require approximately 34,200 m² of additional building space to be accommodated within the North Mall Campus site. Of this space approximately 16,000 m² is required for the extension of the Tyndall Institute, incorporating incubation units for industry and exhibition space to provide more direct engagement between the Tyndall's research (microsystems, photonics, nanotechnology), the business community and the public.

Further context of UCC's strategic objectives is provided in section 4 of the Preliminary North Mall Campus Masterplan.

3.3 MUH – Strategic Objectives

The MUH Campus Plan ‘*A Plan for the Delivery of Expanded Clinical Services and Facilities at MUH (and Distillery Fields) Cork*’ outlines the scope and potential for service development on the MUH Campus, including the North Mall Campus site in Cork. It outlines the hospital’s vision for the development of the totality of the MUH site from both a clinical and infrastructure perspective, while creating options for future investments as medical interventions evolve in the years to come. The Campus Study was developed in a practical manner to support the transformation of healthcare in Cork as envisaged in Sláintecare and Project Ireland 2040.

This plan supports the development of a modern responsive and integrated health system in Cork which will optimise patient safety, patient experience and effectiveness of care.

The MUH Campus Plan identifies the North Mall Campus site as being the preferred location for future clinical and research facilities.

Further context of MUH’s strategic objectives is provided in section 4 of the Preliminary North Mall Campus Masterplan.

3.4 Planning Policy Context

3.4.1 National Planning Framework

The National Planning Framework 2040 (NPF) sets out a policy framework for the development of Ireland to 2040. It is focused on targeting growth to Ireland’s five cities and urban areas, with a rebalancing of growth away from Dublin and towards Cork, Limerick, Galway, and Waterford.

The NPF provides ambitious growth targets for the southern region, which are to be focused on compact growth to ensure sustainable development. It identifies Cork as a city emerging as an international centre of scale, well placed to complement Dublin but in the need of **significant accelerated and urban focused growth** to achieve this role more fully. The NPF recognizes that to accommodate the level of growth required there will have to be a more **dynamic approach to urban land use** and that the existing character of land in urban areas may be subject to change.

The NPF supports, compact growth with an emphasis on the redevelopment of brownfield sites and a presumption in favour of development that can encourage more people and generate more jobs and activities within cities.

National Policy Objective 13 states that in urban areas, planning and related standards, including building height and car parking should be **based on performance criteria** that seek to achieve well-designed high-quality outcomes to achieve targeted growth.

3.4.2 Regional Planning Framework

The Regional Spatial and Economic Strategy for the Southern Region (RSES) translates the National Planning Policy objectives and sets out a medium-term strategy to include:

- **Compact growth:** strengthening and growing cities and metropolitan areas.
- **A strong economy:** building a competitive, innovative, and productive economy, and
- **Healthy and learning region:** achieving improved education health and public services and facilities for all citizens and communities.
- **Sustainable Mobility:** transforming our transport systems towards well-functioning, sustainable integrated public transport, walking and cycling and electric vehicles.

RSES identifies the attributes of Metropolitan areas as being accessible with national and international connectivity, strong business core, innovation, education, retail, health, and cultural role.

For Cork the RSES identifies the higher education institutions of UCC and CIT and elite research centres, including the Tyndall, as a key attribute of the City and its metropolitan area.

The Cork Metropolitan Area Strategic Plan (Cork MASP) is provided as part of the RSES. The Cork MASP identifies that Cork City has a planned growth rate of 50% to 60% to 2040 and that the City and suburban area must grow by two to three times the national average to achieve this growth. It re-emphasises the NPF's position that there is a need for **significant accelerated and urban focused growth** to fulfil this potential.

The Cork MASP identifies the need for 65,000 additional jobs to 2031. In the context of its strategic objectives for Employment and Enterprise the Cork MASP states that:

*Strategic locations and drivers for economic growth in the metropolitan area will include intensification of employment in the city centre, docklands, city suburban areas, **Higher Education Institutes** (UCC & CIT) and international centres of **research and innovation such as Tyndall, Rubicon, MaREI, Cork Science & Technology Park, Mahon, Ringaskiddy, Marino Point, Carrigtwohill, Little Island and Whitegate. Strategic assets supported include Tier 1 Port of Cork, Cork Airport, Health Infrastructure and Cork University Hospital...** (p. 40, emphasis added.)*

The Cork MASP provides several Policy Objectives to deliver the vision of the NPF and RSES including the following two objectives which have specific relevance to the development objectives for the North Mall Campus:

Cork MASP PO 2:

*k. Support investment in strategic national innovation enabling assets within the city, **specifically the expansion of Tyndall National Institute to the North Mall** and the development of UCC's new Cork University Business School in the city centre. (Emphasis added).*

Cork MASP PO 21

*c. Seek **investment in health service infrastructure** within Cork MASP to meet existing and future regional population growth including facilities for Cork University Hospital, the Southern Region's tertiary referral centre and other existing hospitals, the sustainable development of a new acute hospital and **new elective hospital** to service the increasing population of the metropolitan area and wider Region. (Emphasis added).*

3.4.3 Local Planning Framework

The 2015 Cork City Development Plan (2015 CDP) specifically supports development on the North Mall Campus as part of a joint development between the University College Cork and Mercy University Hospital, subject to development respecting the landscape character, built and natural heritage of the site, amenities of adjoining uses, and taking account of the site-specific objectives which are:

- To create a publicly accessible riverside open space with significant ecological value as part of a campus development.
- To provide an additional public pedestrian bridge to access the development site at the eastern end of the distillery site from the Lee Maltings site.
- To provide an additional public route along through the centre of the site along the Mill Stream.

In the 2015 CDP the lands are partially zoned as 'Residential Local Services and Institutional Uses' RLSIU where the objective is:

To protect and provide for residential uses, local services, institutional uses, and civic uses, having regard to employment policies outlined in Chapter 3."

The RLSIU lands are designated as an Area of High Landscape Value, remaining parts of the site are zoned as a Landscape Preservation Zone.

The draft Cork City Development Plan 2022-2028 (draft 2022 CDP) proposes to amend the RLSIU zoning objective to 'Institutions and Community', where the objective is:

ZO 14 Institutions and Community: *to provide for and protect institutional and community uses.*

This objective generally applies to large educational, healthcare, and other institutions. It is noted that they are generally locally or nationally important, long-established uses and play an important role in providing key strategic services in the city. This zone seeks to protect and facilitate the sustainable development of such uses. It is noted that these zones would benefit from a **masterplan-led approach** to development their lands and facilities. The draft 2022 CDP does not propose any changes to the site-specific assets or objectives identified for the lands.

4. Rationale

4.1 Strategic Employment Site

UCC and MUH request that the draft Cork City Development Plan
Designate the North Mall Campus as a Strategic Employment Site, suitable for the development of further education, health, and research, employment opportunities, with potential to accommodate approximately 1,250 FTE jobs ³ .

The draft 2022 CDP identifies seven new Strategic Employment Sites, informed by the Cork City Strategic Employment Locations Study (SELS) 2021. However, the SELS has failed to recognise either the strategic importance of further education, health, and research related employment, or the capacity and potential of the North Mall Campus to provide strategic employment growth, consist with the objectives of the NPF and RSES to provide accelerated urban focused growth which:

- Delivers compact employment growth on a brownfield site, adjoining the city centre.
- Provides a strategic employment site where the joint owners have specific objectives to deliver development and where national level funding has already been earmarked to expand the Tyndall Institute as part of NDP Strategic Investment Priorities 2018-2027.
- Is consistent with National and Regional policy objectives to develop further education, research, and health care facilities, and the specific RSES objective to develop the Tyndall Institute within the North Mall campus, in line with Cork MASP PO 2.
- Is proximate to the proposed Light Rail Transit network and would support sustainable mobility, in terms of the existing and proposed public transport network and pedestrian and cycling connectivity.
- Would deliver high-quality jobs in the heart of Cork city contributing to its international profile and economic strength.
- Would provide capacity to deliver a new elective hospital for Cork City in line with Cork MASP PO 21

³The Draft City Development Plan references the UK Homes & Communities Agency 'Employment Density Guide', which includes an Employment Density Matrix giving an indication of the likely full time equivalent jobs per sqm of space by employment category. The Employment Density Guide suggests that Research and Development Space has an employment density of 1 FTE (full time equivalent jobs) per 40 to 60 sqm of space. The matrix notes that lower densities will be achieved in units with higher provision of shared or communal spaces. Public Sector general office space has a much lower employment density of 1 FTE per 12 sqm of space. The Employment Density Guide does not provide an estimate for third level educational uses, or health services. It is assumed that the average employment density of the future North Mall Campus will be approximately 1 FTE per 50 sqm of space. Based on the floor area capacity demonstrated by the North Mall Campus masterplan for new education, health and research space of approximately 62,620 sqm, the site has the potential to cater for approximately 1,250 FTE jobs.

4.2 Key Employment Types

UCC and MUH request that the draft Cork City Development Plan

Review the section on Key Employment Types provided in Chapter 7 and include a specific category related to Health, Education, and Innovation. This category of employment is a major employer in the City and the growth of the sector is vital to the City's economic success. The sector is too significant to be considered a sub-category of 'offices'.

Chapter 7 of the draft 2022 CDP identifies a series of Key Employment types, but fails to include 'Health, Education and Innovation' as a specific category. Health and Education are not referenced within any of the employment categories, while 'research and development' are referenced as one of a wide range of activities that fall within the category of 'Offices' as a key employment type.

This categorisation fails to recognise either the significance of the health, education, and innovation sector to Cork's economic, or their unique requirements in terms of development space, which include:

- High quality working environments, often with specialised facilities associated with health care, research, or lecturing.
- Accessibility to excellent public transport and active travel modes to facilitate ease of access by employees, patients, students, and business collaborators.
- The importance of clustering and co-location with associated activities.

To recognise the significance and growth potential of the Health, Education, and Innovation sector for Cork, there is a need for Chapter 7 to include the sector as its own 'Key Employment Type' category.

4.3 Support North Mall Campus

UCC and MUH request that the draft Cork City Development Plan

Include additional text in chapter 7, under the heading 'Support Innovation, Research and Development – An Innovation City', to support the development of the North Mall Campus for Health, Education and Innovation uses, as part of a joint development between the University College Cork and Mercy University Hospital, in line with an agreed masterplan. The North Mall campus is a key site with growth potential along the emerging 'Innovation Corridor' outlined in section 7.25. Its development should be explicitly supported in line with the existing provisions of the 2015 Cork City Development Plan and Cork MASP Policy Objective 2.

The 2015 CDP provides explicit support for development on the North Mall Campus as part of a joint development between the University College Cork and Mercy University Hospital. However, the draft 2022 CDP removes any specific reference to the development of the North Mall Campus, despite its clear potential to deliver high quality employment in the city core and strengthen the health, education, and innovation sectors of Cork.

There is a statutory requirement under s. 10 (1A) of the Planning and Development Act 2000 (as amended) that Development Plans are consistent, where practicable, with National and Regional Planning Policy Objectives. Cork MASP Policy Objective 2 provides to:

k. Support investment in strategic national innovation enabling assets within the city, specifically the expansion of Tyndall National Institute to the North Mall and the development of UCC's new Cork University Business School in the city centre. (Emphasis added).

The upgrade of the Tyndall Institute is also identified as a strategic investment priority of the National Development Plan 2018 to 2027, in line with the strategy of the NPF (Project Ireland 2040).

The attached North Mall Campus masterplan sets out how the campus lands could be developed to achieve the joint vision of UCC and MUH, which would include the extension of the Tyndall Institute.

To be consistent with national planning policy objectives, strategic investment priorities and the provisions of Cork MASP Policy Objective 2, the draft 2022 CDP should be amended to provide explicit support to the development of the North Mall Campus.

4.4 Emerging Innovation Corridor

UCC and MUH request that the draft Cork City Development Plan

Explicitly identify the North Mall Campus as part of the emerging Innovation Corridor in Objective 7.3c. The North Mall Campus is identified in the Innovation Corridor mapping of the supporting document 'Cork City Strategic Employment Location Study', but this is not reflected in Objective 7.3c.

The Cork City Strategic Employment Locations Study (SELS) identifies the potential of the emerging innovation corridor along the path of the planned east-west light rail transit corridor, as illustrated in Figure 2 (refer to SELS p. 84.) This potential is reflected in Objective 7.3c which aims to facilitate strategic innovation and competitiveness by supporting the prominence and expansion of existing economic clusters.



Figure 2: Extract from SELS - Innovation Corridor

The Innovation Corridor diagram in SELS identifies the Tyndall, the existing Mercy University Hospital, and the North Mall Campus lands as a 'Medical / Health' cluster. This is not reflected in the text of Objective 7.3c, notwithstanding the fact that the Tyndall is identified in the RSES as an elite research centre, globally recognised, and that MUH is a 'Model 3' city centre hospital, providing complex diagnostic, medical and surgical services at local, regional, and national levels.

MUH is also home to the Centre for Nurse Education, the Health Research Board Clinical Research Facility, Cork's (CRF-C) administrative centre and its Adult Research Unit. In addition, the North Mall Campus already houses several of UCC's Departments, as detailed in section 3.1 of the North Mall Campus masterplan.

The main existing clusters identified in the SELS diagram are referenced in objective 7.3c, and the potential role of the North Mall campus would be strengthened by its explicit reference within the objective.

4.5 Taller Buildings in Inner Suburban Areas

UCC and MUH request that the draft Cork City Development Plan

Revise the Density and Building Heights Strategy to include the North Mall Campus lands within the Primary Urban Corridor and Principle Towns category. The categorisation of the lands as 'Inner Urban Suburban' is inappropriate given its development potential and existing urban context.

The draft 2022 CDP identifies the North Mall Campus lands as falling with the 'Inner Urban Suburban' category in terms of the Density and Building Heights Strategy. The target building height for lands within this category is in the range of 3 to 5 storeys.

The categorisation of 'Inner Urban Suburban' is provided even though:

- The North Mall Campus lands are immediately proximate to the core of Cork City Centre.
- The lands adjacent to the North Mall Campus accommodate several buildings of scale including:
 - The Lee Maltings, built directly opposite on the south bank of the River Lee, and
 - MUH's existing campus, with a strong building line, high plot ratio and ranging in height up to 7 storeys.
- The cliff escarpment to the north of the lands provides a strong backdrop, which allows the site to accommodate buildings of scale.
- The lands are located within the emerging Innovation Corridor, close to the route of the proposed Light Rail System.

The NPF is clear that for growth objectives to be achieved there is a need for **significant accelerated and urban focused growth**. It states that to accommodate the level of growth required there will have to be a more **dynamic approach to urban land use** and that the existing character of land in urban areas may be subject to change.

The target building height for Inner Urban Suburbs at 3 to 5 storeys is very conservative and we would submit that it is not in keeping with national and regional objectives for compact growth, a dynamic approach to urban land use and National Guidelines that building heights should be assessed on performance-based criteria, rather than generic limits.

The categorisation of the North Mall Campus lands as 'Inner Urban Suburban' area is inappropriate given its development potential and existing urban context. It is therefore submitted that the lands should be included within the 'Primary Urban Corridor and Principle Towns' category.

4.6 View Management Framework

UCC and MUH request that the draft Cork City Development Plan

Review the View Management Framework, map 3 to remove the Protected View from St Vincent's Sunday's Well to St Finbarre's Cathedral, as it is inappropriate in the context of growth objectives for Cork and existing development which already impacts this viewpoint. The appropriateness of other protected views should also be assessed.

The View Management Framework of the draft 2022 CDP provides protected views running through the North Mall Campus, including a view from St Vincent's Catholic Church & Presbytery to St. Finbarre's Cathedral.

The objective for the Views and Prospects is for a presumption against development that would harm, obstruct, or compromise the quality or setting of linear views.

There are only fleeting opportunities to see the view from St. Vincent's to St Finbarre's. The potential public viewing point from Sundays' Well Road appears to be further west than indicated in the draft CDP and now has the River Lee Hotel development sitting in the foreground, see Figure 3.

In the context of developing high quality development for strategic employment growth in a transforming city, there is a need for a critical evaluation of the appropriateness of views which run through lands with potential for compact growth. The NPF states that to accommodate strong growth in cities, the existing character of land in urban areas may be subject to change.

We, therefore, submit that the St. Vincent's to St Finbarre's protected view should be removed from Map 3 of the View Management Framework, and, in the context of strong growth objectives for Cork City, the appropriateness of other protected views running through the North Mall Campus site should be critically assessed.

The North Mall Campus has the potential to provide new high-quality, prestigious development which will anchor the existing education, health, and innovation cluster of UCC, MUH and the Tyndall Institute, in the heart of Cork City.

The preliminary North Mall Campus Masterplan demonstrates how proposed development could provide a new urban quarter, while protecting the site's assets and creating a first-rate public amenity space adjacent to the River Lee. The provision of protected view corridors through the North Mall Campus lands should be critically assessed to ensure that they do not unduly limit the strategic growth potential along the emerging Innovation Corridor.

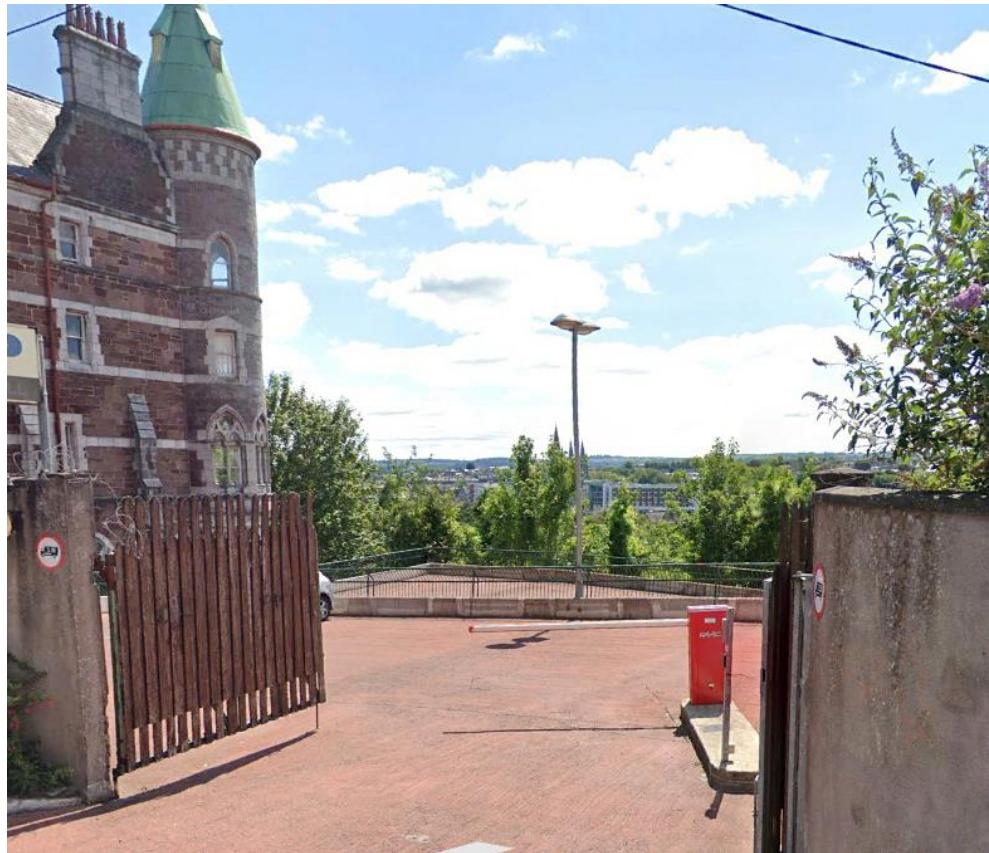


Figure 3: View St Vincent's to St Finbarre's (source: Google Street View)