



h w p l a n n i n g

Submission to Draft Cork City Development Plan 2022 - 2028

Extension of Light Industry and Related Uses Zoning at Clogheen,
Cork

Client Michael O'Regan

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01 Introduction

01.1 Submission Purpose

This submission has been prepared on behalf of Michael O'Regan in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 -2028 (Draft DP). This submission is specifically in response to the Council's draft employment zoning objectives for the Cork City north-western environs area of Clogheen which will form part of the Cork City Development Plan 2022-2028.

Our client welcomes the inclusion of his lands at Clogheen within the 7 no. new strategic employment locations identified in the Draft DP. However, while the eastern portion of the subject lands, comprising c. 4.8 hectares has been zoned *ZO 10 Light Industry and Related Uses* and forms the majority of the 6.7 hectares identified as the Clogheen Business Park Extension, the remaining 1.8 hectare portion of the subject lands has been zoned separately as *ZO 21 City Hinterland*. Given, that the entire subject site was identified in the Cork Strategic Employment Locations Study 2021 (SELS) as suitable for strategic employment zoning, our client considers the *ZO 10 Light Industry and Related Uses* should be extended to reflect this.

01.2 Submission Context

The principle of the extension of the Clogheen Business Park is based on the recommendation of the SELS, where it is considered a Tier 1 site that would provide for decanting opportunities of existing enterprises from the Cork Docklands and assist positively in providing additional jobs in an area of high unemployment. The Draft DP in addition identifies its adjacency to a successful employment hub as providing employment clustering opportunities in line with national and regional policies. The extent of the zoning recommended in the SELS was 9 hectares, which included all of the subject lands. However, this has been reduced in the Draft DP to 6.7 hectares and excludes the western portion of our client's lands.

From Objective 7.10 of the Draft Plan *New Strategic Employment Sites*, we understand this reduction is most likely due to consideration of other Draft DP objectives relating to transport and movement, specifically the indicative route of the proposed Northern Distributor Road as illustrated in the Cork Metropolitan Area Transportation Plan (CMATS).

Since the publication of the CMATS in 2019 significant progress has been made in relation to the route selection of the proposed Northern Distributor Road. We are aware that RPS Consulting Engineers Ltd. have been appointed to carry out this route selection process which is due to be completed by Q4 2021. We understand that it is highly unlikely, due to topographic constraints, that the preferred route will reflect the CMATS indicative route. We consider therefore that the reduction of the *ZO 10 Light Industry and Related Uses* in Clogheen, based on the presence of the indicative route, places unnecessary constraints on the expansion potential of this established employment hub. As the preferred route will be determined prior to the completion of the Development Plan Review Process we ask the Council to have regard to this when finalizing the zoning provision for the area, in order to optimize the development potential of this strategic employment area.

01.3 Submission Request

- That the Council facilitate and support the optimal development of the new Strategic Employment Location, “**Clogheen Business Park Extension**”, and extend the zoning ZO 10 Light Industry and Related Uses to include the 1.8 hectare western portion of our client’s lands, subject to the conclusion of the Northern Distributor route selection process which is due to be completed by Q4 2021.

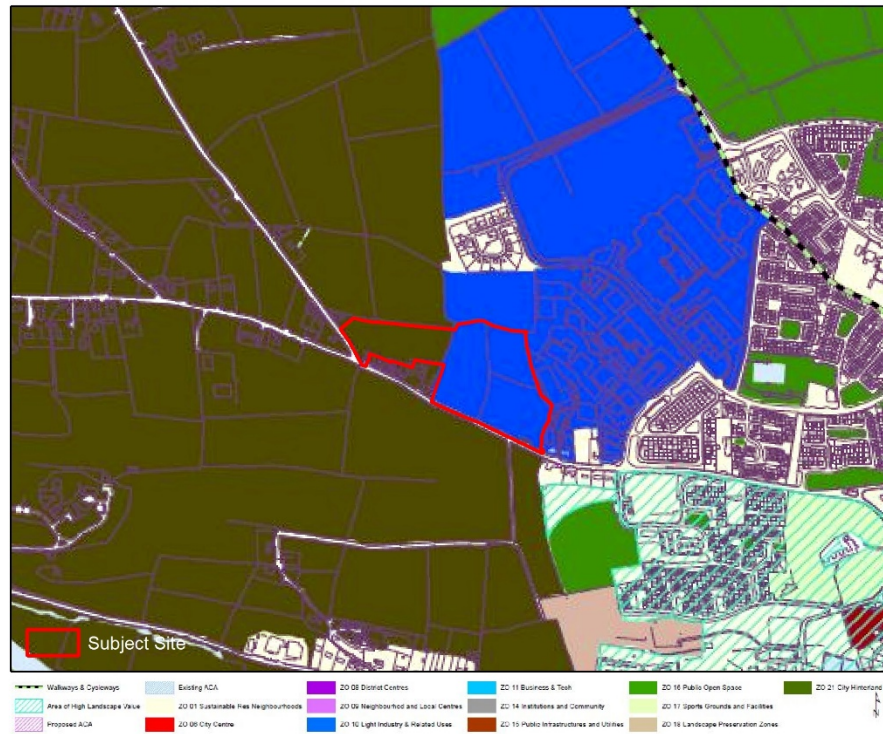


Figure 01.1 Draft DP Employment Zoning at Clogheen

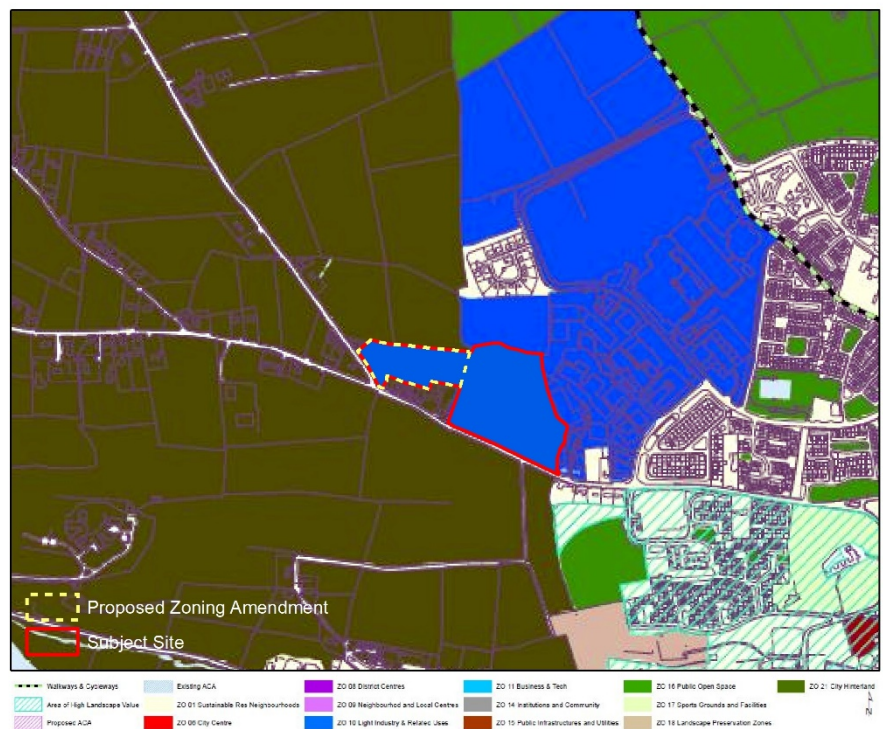


Figure 01.2 Proposed Employment Zoning at Clogheen

02 Summary of Policy Context

The SELS notes that planning policy context in Cork has been rapidly evolving in recent years with the publication of the National Planning Framework in 2018 and more recently the release of The Regional Spatial and Economic Strategy (RSES) for the Southern Region, the Cork Metropolitan Area Strategic Plan (MASP) and the Cork Metropolitan Area Transport Strategy (CMATS). The NPF set the scene for a rapid expansion of the City's population over the coming two decades. The RSES has further expanded on these growth objectives and outlines guiding principles in terms of strategic employment growth. A number of common themes have emerged among all policies namely:

- The need to ensure that there is a strong coordination between land use and transport planning.
- Ensuring that identified locations for strategic employment are infrastructure-led.
- That traditional models of delivering employment lands need to be revisited with an approach that is orientated towards placemaking and meeting the needs of the modern workforce.
- Areas for growth and smart specialization should be further explored, as well as the potential to partner with existing third level and healthcare institutions to achieve synergies.
- Encouraging the growth of clusters and co-location of Small and Medium size Enterprises (SMEs) with Multi National Corporations (MNCs) to enhance mutual benefits to both.

Section 7.17 of the Draft DP

In addition to quantifying the jobs target and the level of employment land, the Development Plan through the spatial distribution of new employment lands has sought to positively respond to wider challenges that includes targeting neighbourhoods where there are relatively high levels of unemployment, creating inclusive and sustainable communities and anticipating likely market trends over the period to 2028.

Section 7.17(d) states that the Draft DP incorporates SELS recommendations and identifies 7 new strategic employment locations, including Clogheen, which it states have been 'identified owing to the proximity to successful employment facilities or where there is market demand for a location alongside the strategic road network'.

04 Key Planning Considerations

04.1 Proposed Northern Distributor Route

As noted in Figure 04.1, the indicative route of the proposed Northern Distributor Road, as identified in CMATS in 2019, bisects the subject site. We believe this is the underlying rationale behind the Council's reduction of the *new Strategic Employment Location*, "*Clogheen Business Park Extension*", from 9 hectares as identified in the SELS to 6.7 hectares in the Draft DP.

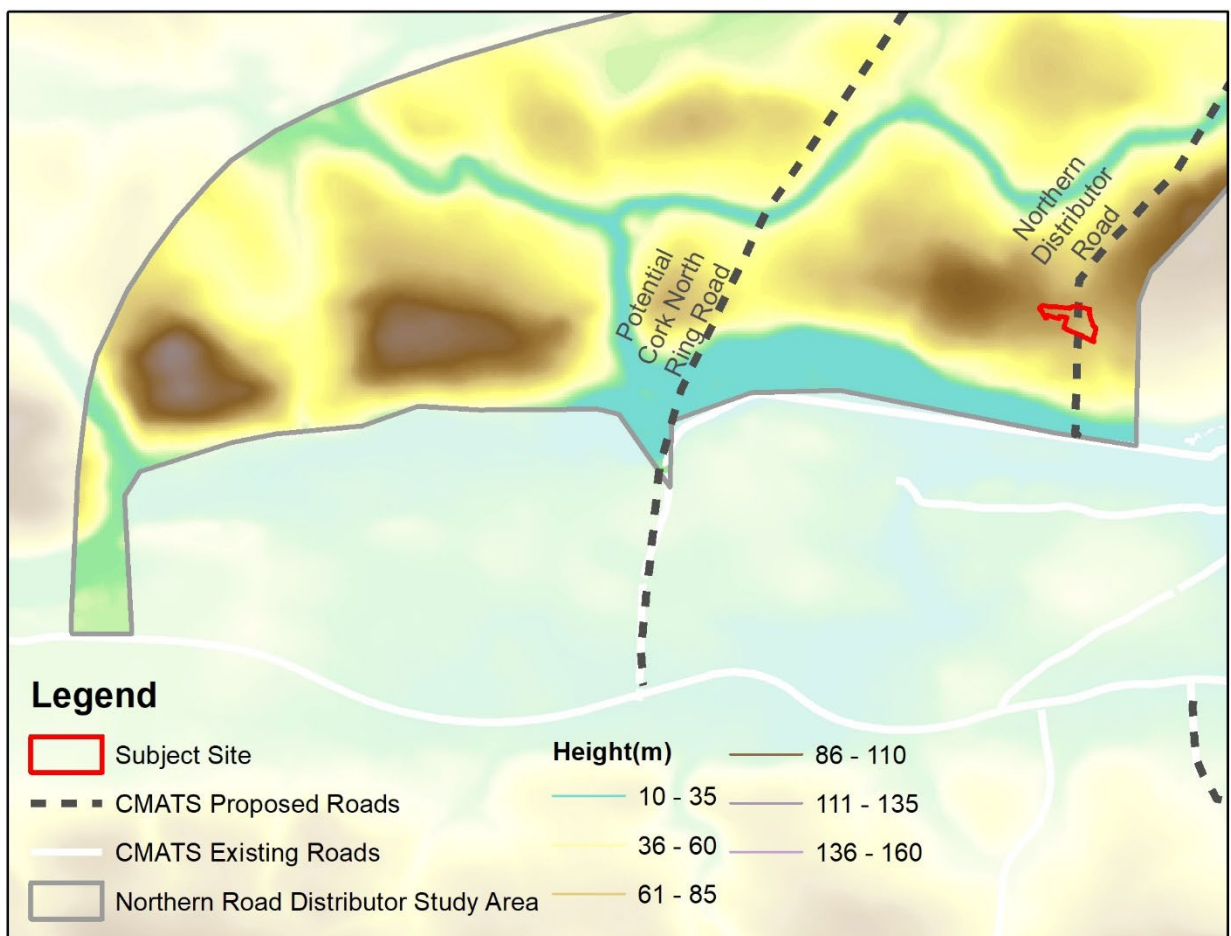


Figure 04.1 Subject Site in Context of CMATS Indicative Distributor Road, the Route Selection Study Area and the Topography

However, we ask the Council to note that the indicative nature of the CMATS alignment is underlined in the Project Brief for the *Provision of the Preferred Route Selection Report for the Proposed Cork Northern Distributor Road* produced in June 2020, in which the study area in the vicinity of the subject site extends to a c. 3.7km corridor (ref Figure 04.1 and 04.2).

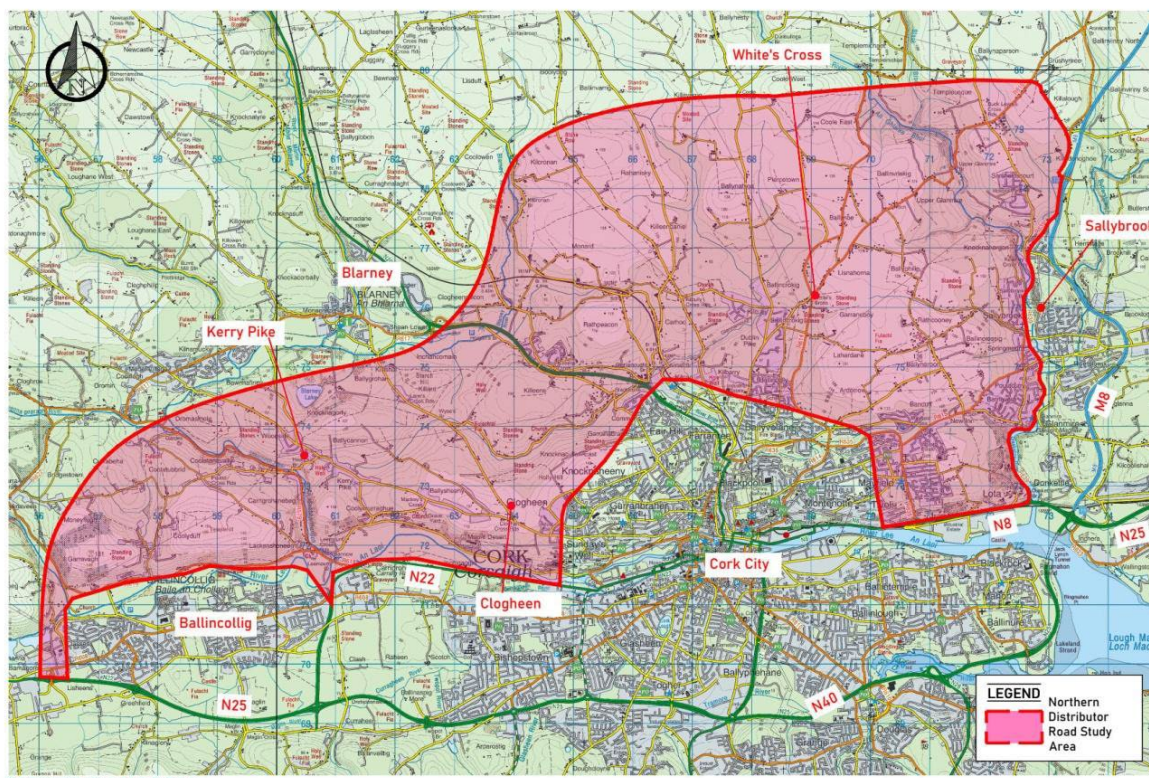


Figure 04.2 Route Selection Project Brief Study Area Map

The Project Brief notes that CMATS proposes that the Northern Distributor Road provide connectivity to the west with the existing N22. It concludes:

to achieve this, the link would need to address several topographical and environmental considerations including the River Lee and its associated floodplain, the requirement for a new bridge and a desire to avoid severing the Lee Fields parklands.

It is evident from Figure 04.1 that the topography in the vicinity of the subject site is at its most challenging in relation to connectivity with the N22 to the south. In view of this constraint, we understand that it is extremely unlikely that the preferred route that RPS Consulting Engineers Ltd. are currently identifying, will reflect the CMATS indicative route.

As the timeframe for the completion of the route selection is Q4 2021, the preferred route alignment will be known to the Council prior to the finalising of the Cork City Development Plan. In the probable scenario that the route will not be in the vicinity of the subject lands, we ask the Council to ensure that the recommendations of the SELS are fully implemented in this context and that the ZO 10 *Light Industry and Related Uses* is extended to include the 1.8 hectares of the subject lands which are excluded in the Draft DP.

05 Conclusion

Our client welcomes this opportunity to make a submission on the employment objectives contained within the Draft DP. Our client and the Council are aligned in the goal to support the growth of employment and enterprise in the Cork Metropolitan area, and in particular in the north-western environs, where the socio-economic review in the SELS identifies a clear juxtaposition between high job numbers and high unemployment rates with available jobs not catering for the skillsets of the local demographic.

In this context our client supports the identification of Clogheen as one of 7 no. strategic employment areas and the zoning of 6.7 hectares of land for *ZO 10 Light Industry and Related Uses* in the Clogheen Business Park Extension. However, we note that the SELS recommends that all of the subject lands be included within the Clogheen Business Park Extension.

Having reviewed the Draft DP we note the recommended zoning has been reduced having regard to the CMATS indicative alignment of the proposed Northern Distributor Road, which bisects the site. However, we consider that based on topography in the vicinity of the subject site it is probable that the preferred route will be located further to the west within the 3.7 km study area corridor that applies to this section of the route, where the topography is more suitable.

We ask the Council to note that the route selection process is due to be complete by Q4 2021. Subject to the preferred route not impacting on our client's site, we ask the Council to ensure that the recommendations of the SELS are fully implemented and our client's lands are all included within the *ZO 10 Light Industry and Related Use* zoning.

In view of the strategic employment area designation of the Clogheen site we consider it beholden upon the Council to maximise the provision for suitably scaled, employment zoned lands at this location in the Cork City Development Plan 2022-2028.