



h w p l a n n i n g

Submission to Draft Cork City Development Plan 2022 - 2028

Inclusion within Tier 3 Zoning

Client Corkery Family

September 2021

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Connecting places.

Contents

01	Introduction	1
01.1	Submission Purpose	1
01.2	Submission Context	1
01.3	Submission Request	3
02	Summary of Policy Context	4
02.1	National Planning Framework (NPF)	4
02.2	Regional Spatial and Economic Strategy 2020 (RSES)	4
02.3	Cork Metropolitan Area Transport Strategy (CMATS)	5
02.4	Draft Cork City Development Plan	5
03	Key Planning Considerations	6
03.1	Access and Catalyst Development	6
04	Conclusion	7

01 Introduction

01.1 Submission Purpose

This submission has been prepared on behalf of the Corkery Family in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 - 2028 (Draft DP). This submission is in response to the Council's draft zoning objectives for the south-western city suburban area, specifically the lands off Model Farm Road, between Ballincollig and the western city suburbs, which will form part of the Cork City Development Plan 2022-2028.

Our clients welcome the recognition that the c. 220 hectares of lands in this area, which includes c. 20 hectares in their ownership (as identified in Figure 01.1) are a strategic future growth location for Cork City and support the proposed multi-disciplinary, comprehensive and co-ordinated approach to their development.

In this context they welcome the zoning of 20 hectares to the south of their lands for *ZO 03 Tier 3 Residential Neighbourhood* use, and the recent permission for 89 no dwellings in the lands immediately adjoining theirs. In view of the excellent access that their lands enjoy they consider that they should be similarly zoned to act as an enabler for the development of adjoining lands to the south.

01.2 Submission Context

The subject lands off Model Farm Road form part of the Strategic Land Reserve (SLR) 7, identified in the 2017 Ballincollig Carrigaline Local Area Plan (LAP) as being a preferred location for population and housing in the metropolitan area. The expansion of the Cork City boundary and the City Development Plan Review Process represent an ideal opportunity to re-evaluate the development potential of these lands, which have been designated as metropolitan greenbelt for several decades, thereby maintaining a separation between the western extent of the city and Ballincollig. With Ballincollig and Curraheen now included within the city area and the Cork Science and Innovation Park (CSIP) planned to the south, all connected by a proposed Light Rail Transit (LRT) ¹, the function of these lands needs to be re-evaluated and policies put in place to guide the development of what is an emerging urban and transportation corridor.

Significant infrastructural investment, including delivery of roads, cycle infrastructure and public transport are planned in order to fully realise the development potential of SLR 7 in the medium to long term. However, we consider that within the lifetime of the upcoming development plan, pockets of this strategic land reserve could be released for development serving as a catalyst for the wider master planning of the area and contributing towards the realisation of population targets for Metropolitan Cork.

Our client's lands at the northern end of the strategic land reserve have the potential to provide multiple traffic, cyclist and pedestrian access points to the land reserve. The proposed vehicular access can be achieved through minimal interventions to the existing road network.

¹ Cork Metropolitan Area Transport Strategy 2019

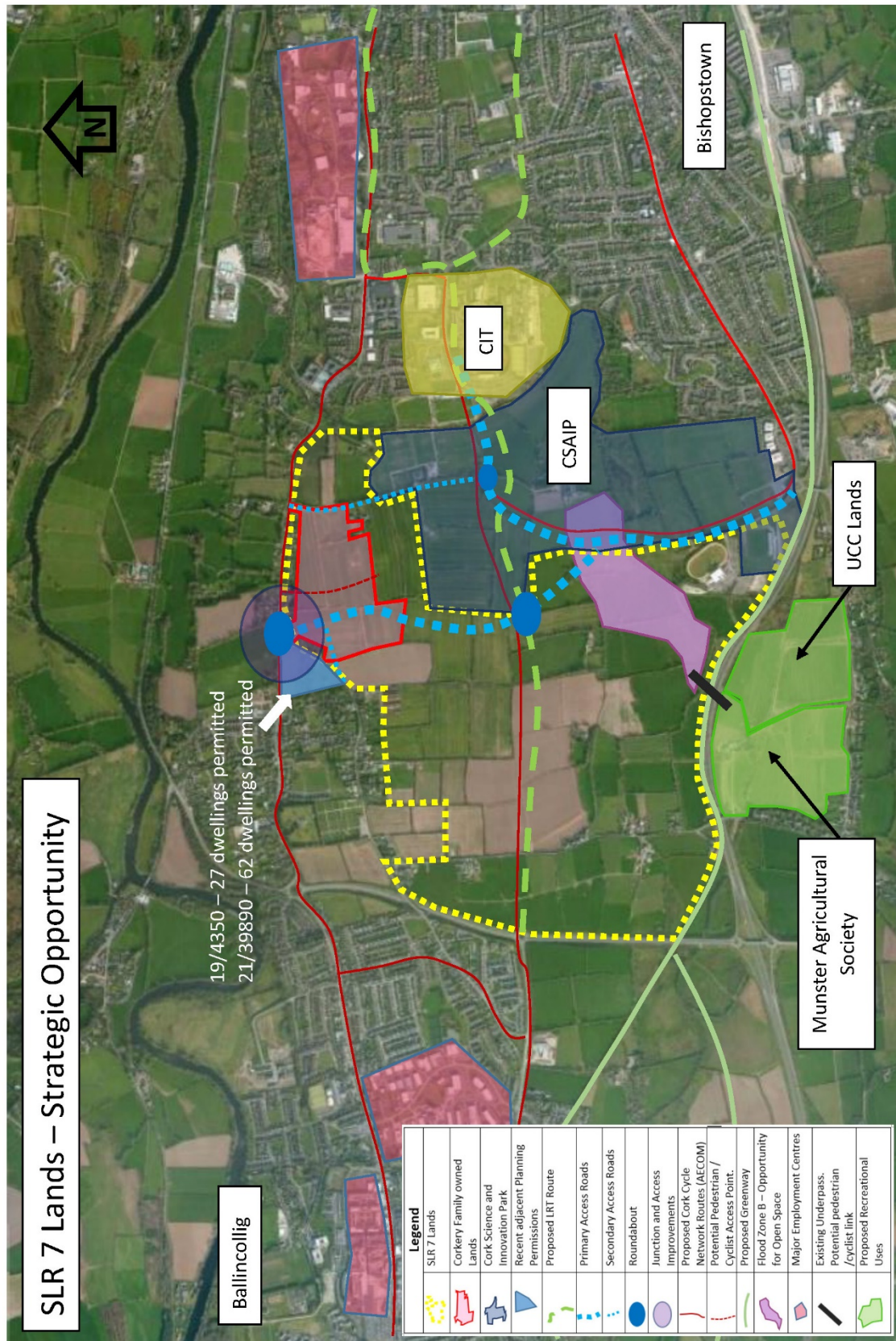


Figure 01.1 Subject Site in Context of SLR 7 and other Strategic Land use and Transport Proposals.

01.3 Submission Request

- That the Council include the subject lands in the ZO 03 Tier 3 Residential Neighbourhood zoning (as indicated in Figure 01.3).

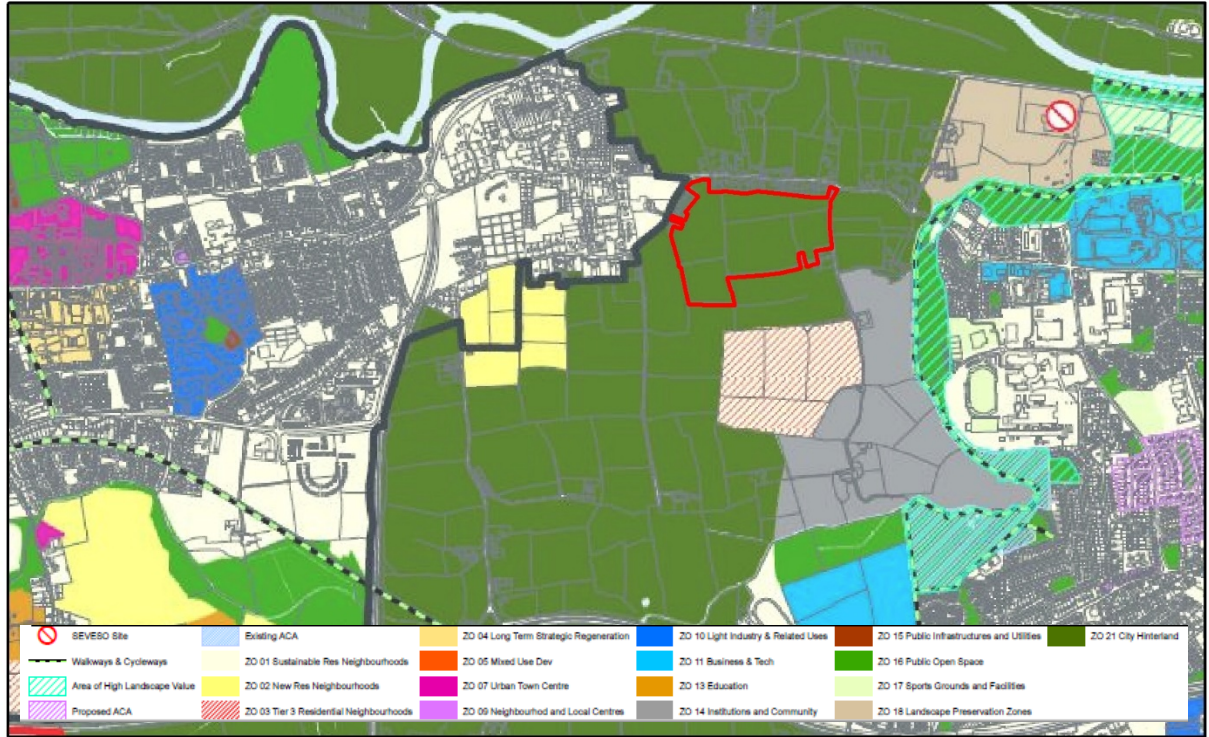


Figure 01.2 Draft DP Zoning at Model Farm Road

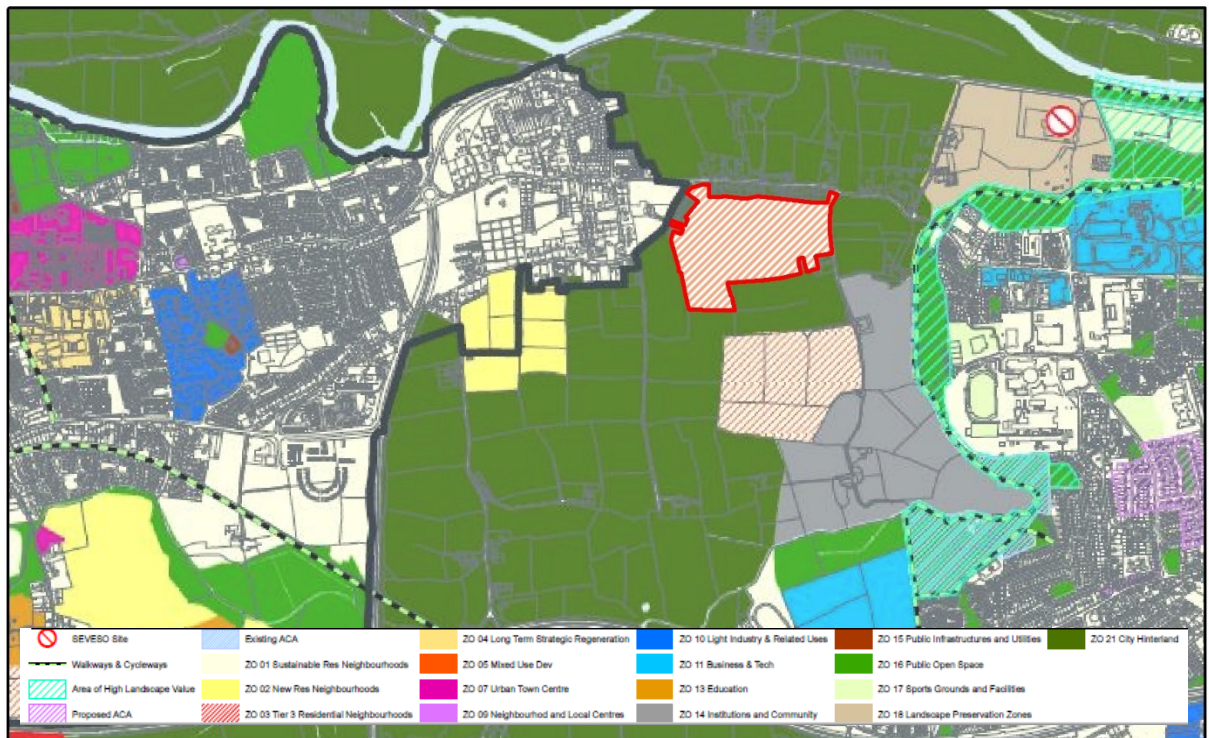


Figure 01.3 Proposed Employment Zoning at Model Farm Road

02 Summary of Policy Context

02.1 National Planning Framework (NPF)

There are numerous objectives contained in the NPF of relevance to the future development and planning policy of Cork City and suburbs including areas around the Model Farm Road now located within the City Boundary. However, we consider NPO 2a, 3b, 5 relating to targeted growth in the existing Cities and towns to be of particular significance. In addition, NPO 72 (a,b,c) refers to the need to assess deliverability of zoned lands based on existing services or potential to service the lands within the lifetime of the Development Plan.

National Policy Objective 2a

- A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs¹⁵.

National Policy Objective 3b

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints¹⁸.

National Policy Objective 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.

National Policy Objective 72b

When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.

National Policy Objective 72c

When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

A new tiered approach to land zoning was established in the NPF, with National Policy Objective (NPO) 72a stating:

Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

The NPF states that further lands may be included in development plans that cannot be serviced during the life of the plan based on an infrastructural assessment of the planning authority. These cannot be categorized as Tier 1 or Tier 2 and should not be zoned for development or included within a development plan core strategy for calculation purposes.

02.2 Regional Spatial and Economic Strategy 2020 (RSES)

The RSES follows on from the NPF in promoting development with access to quality public transport opportunities. In particular section 6.3.5 of the RSES summarises the regional policy objectives for the integration of transport planning with spatial planning policies, which includes consolidating and intensifying new residential and employment

development to render it serviceable by public transport and ensuring that it is accessibility by walking and cycling².

The Cork MASP Objective 1b seeks to promote the Metropolitan Area as a cohesive area where population and employment growth are integrated. The RSES espouses the concept of the 'Right Location'³ which prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. The RSES also supports the concept of sustainable, employment-led growth in settlements in the Cork MASP and wider region⁴.

02.3 Cork Metropolitan Area Transport Strategy (CMATS)

Chapter 6 of the published CMATS refers to proposed improvements to walking infrastructure and includes the following listed objective:

Model Farm Road – improve links between schools, employment centres, CIT and bus / future light rail;

Model Farm Road is identified as a future primary cycle route in the final published CMATS. Primary routes have been designated as such because they experience the highest level of demand.

The Plan also outlines the rationale for delivery of the proposed light rail system in Cork, among them to:

Unlock strategic development areas in its catchment area including the Cork City Docks, Curraheen, Ballincollig and Mahon.

CMATS notes that the LRT will be preceded by a high frequency bus service between Mahon and Ballincollig to be delivered in the short-term to underpin higher development densities along the public transport corridor.

02.4 Draft Cork City Development Plan

Section 2.51 introduces a Tier 3 category of zoned lands that are considered to be unlikely to be serviced during the lifetime of this plan and are identified as long-term strategic sites needing long term planning and service delivery. They are identified to safeguard and strategically plan for the longer-term growth. Table 2.4 details the location and quantum of Tier 3 lands within the city. Within the South-West Central Urban Area only 20 hectares to the south of the subject site are identified as Tier 3 lands.

Sections 10.227 and 10.228 of the Draft DP address the future development of lands between Ballincollig and the western city suburbs, acknowledging this area represent a strategic future growth location for Cork City due to: its location between the City and Ballincollig; along the proposed LRT route; in proximity to services such as employment, higher education and health care; and adjacency to the proposed CSIP.

However, it concludes that the scale of the site requires a multi-disciplinary master planning approach in order to provide for the comprehensive and co-ordinated development of these lands.

²RSES RPO 151

³ Section 3.9 RSES

⁴ Section 2.4 of the RSES

03 Key Planning Considerations

03.1 Access and Catalyst Development

The lands between Ballincollig and the western suburb are well placed to benefit from existing transport connectivity and proximity to major employment, educational and service centres at Ballincollig, Bishopstown and Curraheen. The future development of this area will centre around the proposed LRT route as outlined in CMATS and the emergence of the planned Cork Science and Innovation Park (CSAIP).

The development of large tracts of land such as this strategic growth area will require an incremental and targeted policy approach though the facilitation of catalyst projects. We note and welcome the proposed Tier 3 zoning of 20 hectares of lands to the south of the subject lands. However, we consider these lands currently have significant access constraints. Conversely, our clients' lands are located at Minister's Cross where the Clash Road meets the Model Farm Road. Model Farm Road is served by an existing high frequency bus service (route 220) connecting Ballincollig to the City Centre. This is an element of the high frequency bus service proposed in CMATS to precede the LRT and to deliver in the short-term to underpin higher development densities along the public transport corridor. The suitability of these lands for development is underlined by the recent granting of permission for 89 no dwellings in the immediately adjoining lands to the west (planning ref. 21/39890 and 19/4350).

We acknowledge that unlocking the overall 220 hectares of land between Ballincollig and the western city suburbs will require the delivery of internal access road infrastructure, however, we consider that the subject lands along Model Farm Road, can be developed with minimal intervention and act as an enabler of future development. We refer to the drawings enclosed with this submission as prepared by MHL and Associates Consulting Engineers. These drawings outline proposals to secure access to the subject lands with minimal interventions required to the existing road infrastructure. Indeed, due to the minimal nature of these interventions they could be funded privately.

The main thrust of the proposals is based around the provision of the roundabout at the junction between Clash Road and Model Farm Road. This would form the main entrance to the subject lands. Our clients have ownership of a residential property at the north-eastern corner of the lands facing onto Model Farm Road, where a secondary entrance to the subject lands could be provided if required. In addition, there is a further gap in development along model farm road which could be utilised to provide pedestrian and cycle access to the lands. Full details of these provisions are outlined on the accompanying MHL drawings.

As well as being able to provide access to their own lands with minimal intervention, the development of our client's land holding has the potential to unlock the remainder of these strategic lands. We therefore consider that these lands fulfill the objectives of the NPF in terms of short-term deliverability. The Tier 3 zoned lands in the Draft DP, to the south of the subject site are currently lacking an appropriate access to facilitate their development in advance of the construction of the CSAIP Access Road. Pending the construction of the CSAIP Access Road, Model Farm Road presents the best option for access to these lands.

04 Conclusion

Our client welcomes this opportunity to make a submission on the zoning objectives contained within the Draft DP. Our clients and the Council are aligned in the goal to support the growth of the lands between Ballincollig and the western city suburbs as a strategic growth area in the Cork Metropolitan area.

In this context our clients welcome the Council's identification of the requirement for a multi-disciplinary master planning approach in order to provide for the comprehensive and co-ordinated development of these lands and support the Tier 3 zoning of the 20 hectares site to the south of the subject lands. However, these lands are currently dependent on the construction of the CSAIP Access Road to facilitate their development.

Conversely, our clients' lands can be easily accessed and are serviceable without significant infrastructural interventions or investments, as is exemplified by the recent permission for 89 no. dwellings in the adjoining sites to the west. In addition, pending the construction of the CSAIP Access Road, Model Farm Road presents the best option for access to the wider landbank. Our clients' lands occupy a strategic location and can unlock adjacent lands and development potential.

We ask, therefore that the Council extend the ZO 03 (Tier 3) zoning to include the subject lands when finalizing the zoning provision for the area, in order to optimize the development potential of this strategic development area. In view of their recognition in the Draft DP that this area is a strategic future growth location we consider it beholden upon the Council to ensure that the optimal housing yield is realized from these lands in a timely manner by the provision of appropriate residential zoning at this accessible and serviceable location in the Cork City Development Plan 2022-2028.

