

Submission to the Draft Cork City Development Plan

For Development at Sandbrook, Wilton, Cork

on behalf of Minkbury Investments Ltd

September 2021



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CHARTERED PLANNING CONSULTANTS

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1. Introduction

This submission to the draft Cork City Development Plan is prepared by McCutcheon Halley Chartered Planning Consultants in response to public notices inviting submissions from third parties and interested parties on the Cork City Development Plan review in accordance with section 12(2)(b) of the Planning and Development Act 2000. Our client welcomes the publication of the Draft Cork City Development Plan 2022-2028 and the opportunity to participate in the plan making process which will inform the future development of Cork City.

This submission is prepared on behalf of Minkbury Investments Ltd., and relates to lands at Sandbrook, Doughcloyne, Wilton, Cork. Our client's landholding is located within the south environs to the south of Wilton District Centre, north of the N40 South Ring Road and west of St. Finbarrs Hurling and Football Club. The approximate site boundary of our client's site is outlined in red in Figure 1 below.

This submission requests the following in the forthcoming Development Plan for Sandbrook:

- The zoning of our clients' land to be retained for residential use in the upcoming Cork City Development Plan

This submission is structured as follows:

- Site Context
- Existing Planning Policy
- Rationale
- Summary and Submission Request

2. Site Context

The subject site is located c.2.8km to the southwest of Cork City centre before the junction of the South Ring Road. The site is 0.64ha in area and is currently an unutilised piece of residentially zoned lands within the urban fabric of Cork City comprising trees and scrub. The site is broadly rectangular in shape and is bound by the Southbury Road estate to the north, the South Ring Road to the south as well as a number of existing residential uses to the west including four three storey semi-detached blocks of apartments at Sandbrook. St. Finbarrs Hurling and Football Club is also located to the east.

The site is located in close proximity to the CUH, which is located c.750m to the northwest along the Sarsfield Road. The Cork University Hospital campus also comprises the Cork University Maternity Hospital and the Cork University Dental School Hospital as indicated on Figure 1 below. These are all within a 10-15minute walk time and connected to the proposed development via numerous bus routes which pass the site at South Bury Road, Summerstown Road, Sarsfield Road and Bishopstown Road.

Furthermore, the Wilton District Centre as well as the University College Cork campus and Cork Institute of Technology campus are all within a reasonable walking distance with exceptional bus and cycling connections readily available.

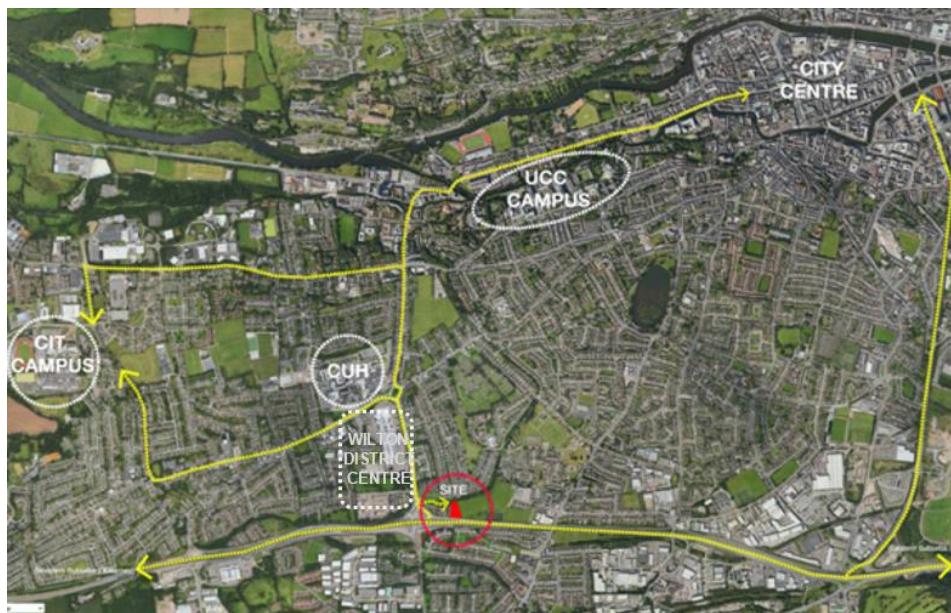


Figure 1 – Clients landholding at Sandbrook, Doughcloyne, Wilton, Cork

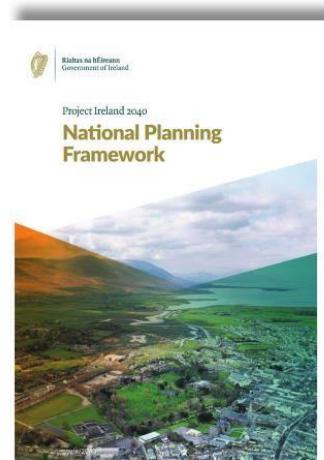
3. Existing Planning Policy

3.1 National Planning Framework – Project Ireland 2040

In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027. These plans aim to achieve balanced regional development by outlining a clear hierarchy for the urban centres outside the greater Dublin area, with Cork being promoted as the State's second city, fulfilling a nationally important role in counterbalancing the Capital.

A core objective of the National Planning Framework is to build an average of 25,000-30,000 new homes annually to meet future planned needs of the population and deal with the demand-supply imbalance over recent years, in effect a doubling of annual housing output from 2016/2017 levels.

According to the National Development Plan, Cork is expected to increase its population by 125,000 by 2040, which will require the provision of additional housing to accommodate approximately 6,000 people every year up to 2040.

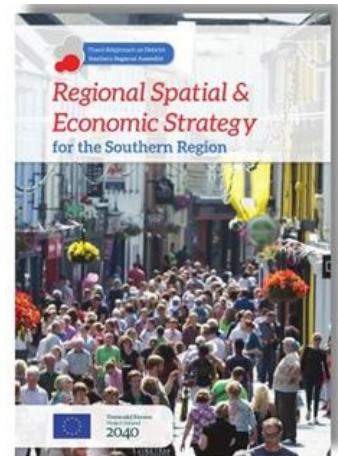


The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. According to the NDP, a key tenet to achieving these ambitious housing targets is through compact growth and targeting a greater portion (40%) of future housing development to be within and close to the existing '**footprint of built-up areas**'; and that future homes are required to be located where people have the best opportunities to access a **high standard quality of life**.

3.2 Regional Spatial & Economic Strategy for the Southern Region

RSES is a strategic document, which identifies high-level requirements and policies for the Southern Region, setting out the high-level statutory framework to empower each local authority to develop CCDPs, Local Area Plans (LAPs) and LECPs that are coordinated with regional and national objectives.

The RSES also includes a Metropolitan Area Strategic Plan (MASP) which includes *"identifying infill and regeneration opportunities to intensify housing development in inner city and suburban areas, supported by strengthened public transport connectivity, public realm and urban amenity projects."*



3.3 Cork County Development Plan 2014

The 2014 Cork County Development Plan 2014 (CCDP) includes a number of objectives which are particularly relevant to the Cork City South Environs. In the CCDP, the South Environs is located within the Cork Gateway area. Objective HOU3-1b states that it is an objective of the CCDP to promote development which prioritises walking, cycling and public transport including rail:

"Promote development which prioritises and facilitates walking, cycling and public transport use, both within individual developments and in the wider context of linking developments together and providing connections to the wider area, existing facilities and public transport nodes such as bus and rail stops"

Objective CS 4-1 of the 2014 County Development Plan sets out the key objectives for the Cork Gateway, which includes the following:

"CS 4-1 a) Recognise the importance of the role to be played by Metropolitan Cork in the development of the Cork 'Gateway' as a key part of the Atlantic Gateways Initiative and, in tandem with the development of Cork City, to promote its development as an integrated planning unit to function as a single market area for homes and jobs where there is equality"

of access for all, through an integrated transport system, to the educational and cultural facilities worthy of a modern and vibrant European City,”

The CCDP also illustrates that the South Environs should be developed to complement Cork City:

“Develop the Cork City Environs so that they complement the City as a whole. In the south, priority should be given to consolidating the rapid growth that has occurred in recent years by the provision of services, social infrastructure and recreation facilities to meet the needs of the population”

The subject site at Sandbrook lies within the South Environs of Cork City. Objective 3-1 of the Cork County Development Plan (CCDP) 2014 states that the strategic aim of the City Environs (North and South) is to:

“Growth in population and employment so that the Cork Gateway can compete effectively for investment and jobs. Develop to complement & consolidate the development of the city as a whole and providing enhanced potential to rebalance the City through new development in the north.”
In terms of residential density, the CCDP states that a Medium 'A' (i.e. 20-50 dwellings per hectare) will be applicable in *“city suburbs, larger towns over 5,000 population and rail corridor locations”*.

- It promotes development which prioritises and facilitates walking, cycling and public transport use by providing pedestrian and cycle connections to the existing footpath network in the area.
- The proposed density of 73.4 units per hectare is in accordance with the Medium 'A' (i.e. 20-50 dwellings per hectare) objective for *“city suburbs, larger towns over 5,000 population and rail corridor locations”*.

The current residential zoning for the site should be retained given the sites proximity to local services and employment zones.

3.4 Ballincollig Carrigaline Municipal District Local Area Plan 2017

In the 2017 Ballincollig Carrigaline Municipal District Local Area Plan (LAP), the South Environs forms part of the Cork Gateway. It notes that the strategy for the area is to grow in population in tandem with the expansion of the employment base to compete effectively for investment and jobs. There is a target dwelling output of 1,285 from 2017 to 2023.

In the 2017 LAP, the lands form part of the SE-R-13 zoning, with the following specific objective:

“SE-R-13: Medium A density residential development, subject to satisfactory vehicular and pedestrian access arrangements.”

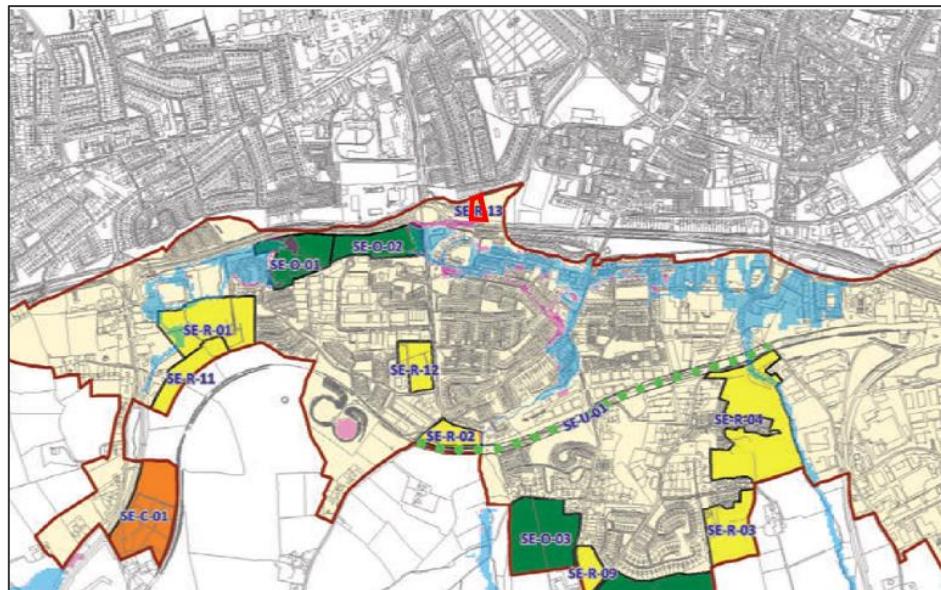


Figure 2 Extract from the 2017 Zoning Map for the Cork City South Environs

A portion of the access route into the proposed site is located within the Cork City Development boundary as defined by the Cork City Development Plan 2015-2021. It is important to note that the access to the overall site now forms part of the Cork City Administrative boundary since May 2019. The Cork City Development Plan 2015-2021 (CDP) includes a number of objectives which are particularly relevant to the access to the site. Objective 5.1 states that it is an objective of the plan to:

- b. To reduce the percentage of persons who drive to work to 60% by 2021;*
- c. To invest in transport infrastructure based on the transport user hierarchy: pedestrians, cyclists, public transport users, freight, delivery and waste vehicles; private vehicle users;*
- d. To encourage and facilitate cycling and walking for short/local trips by providing appropriate infrastructure, promoting "soft-measures" that influence change in transport behaviour, and by encouraging proximate, compact land uses;*
- e. To encourage increased use of rail services, bus, and carpooling/ car sharing for longer journeys by providing local access infrastructure to key transport nodes, by using information, pricing mechanisms and other "soft-measures" to influence change in transport behaviour, and by encouraging public- transport orientated development;*
- f. To develop a Bus Rapid Transit system from Ballincollig to Mahon via the City Centre and Docklands;*
- g. To work with transport stakeholders to further integrate transport modes and facilitate multi-modal trip chains;*

- h. To protect the capacity, efficiency, and safety of national roads and associated junctions while maintaining and enhancing the economic vibrancy of Cork City;*
- i. To provide new local roads, streets, upgraded streets, and pathways where required to increase connectivity;*
- j. To actively manage capacity of the city's street system to reduce the negative impacts of congestion and to maximise the use of the existing street network;*
- k. To control the supply and price of all parking in the city in order to achieve sustainable transportation policy objectives, while recognising the need to maintain economic vibrancy until more gaps in the existing alternative transportation systems are filled;*
- l. To encourage the use of innovative measures to reduce the requirement for car parking;*

The only access option to the site is on lands zoned as "Public Open Space" under the current Cork City Development Plan, where it is an objective to:

"Protect, retain and provide for recreational uses, open space and amenity facilities, with a presumption against development land zoned public open space areas for alternative purposes, including public open space within housing estates."

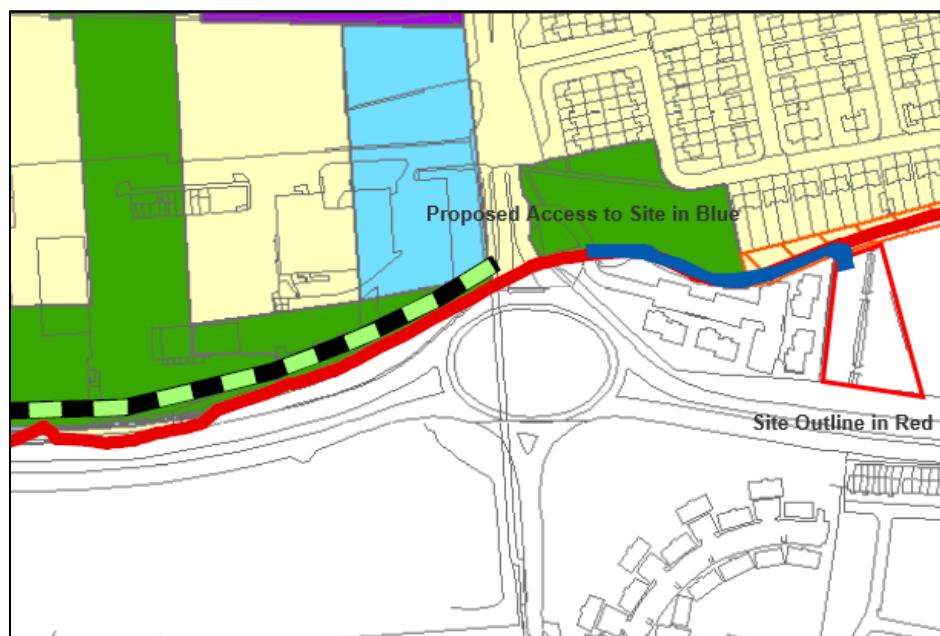


Figure 3 Subject site outlined in red within former Cork County Council administrative area. Proposed access outlined in blue within Cork City Council administrative area and zoned part of Public Open Space

A portion of the site is identified as being an 'area of high landscape value' where it is an objective to:

"Conserve and enhance the character and visual amenity of Area of High Landscape Value (AHLV) through the appropriate management of development, in order to retain the existing characteristics of the landscape, and its primary landscape assets. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape. There will be a presumption against development where it causes significant harm or injury to the intrinsic character of the Area of High Landscape Value and its primary landscape assets, the visual amenity of the landscape, protected views, breaks the existing silhouette; the character and setting of buildings, structure and landmarks; and the ecological and habitat value of the landscape."

Any new development in areas identified as high landscape value must respect the character and the primacy and dominance of the landscape while also complying with the underlying land use zoning.

In terms of the size and scale of development, section 16.13 of the plan provides indicative plot ratios (i.e. the amount of floor space proportionally in relation to the site area), which provide a useful indicator when considering the capacity of a development site and ascribing building volumes to be placed on a site. Section 16.14 and Table 2.1 of the plan provides indicative standards of plot ratio for certain parts of the City, which are set out in Figure 4.

Table 16.1 Indicative Plot Ratio Standards

Location	Plot Ratio
City Centre	1.5 - 2.5
Docklands (north and south docks)	1.5 - 2.5
Suburban Key Development Areas	1.0 - 1.75
Inner Suburban (pre-1920 city)	1.0 - 1.5
Neighbourhood and District Centres	1.5 - 1.75
Suburban Offices	0.75 - 1.0

Table 1 Extract from Table 16.1 from the 2015 Cork City Development Plan.

Section 16.59 of the CDP states:

"To make the most sustainable use of existing urban land, the planning authority will consider the appropriate development of infill housing on suitable sites on a case by case basis taking into account their impact on adjoining houses, traffic safety etc. In

general, infill housing should comply with all relevant development plan standards for residential development, however, in certain limited circumstances; the planning authority may relax the normal planning standards in the interest of developing vacant, derelict and underutilised land. Infill proposals should:

- *Not detract from the built character of the area;*
- *Not adversely affect the neighbouring residential amenities;*
- *Respect the existing building line, heights, materials and roof profile of surrounding buildings;*
- *Has an appropriate plot ratio and density for the site;*
- *Adequate amenity is proposed for the development.”*

3.5 CMATS

The Cork Metropolitan Area Transport Strategy (CMATS) 2040 was developed by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council.

CMATS represents a coordinated land use and transport strategy for the Cork Metropolitan Area to cover the period up to 2040. It takes its lead from the NPF 2040 and the National Development Plan (NDP) 2018-2027 which envisages that Cork will become the fastest-growing city region in Ireland with a projected 50% to 60% increase of its population by 2040.

The Strategy provides a coherent transport planning policy framework and implementation plan to support the planning authorities land use zonings and to help promote higher densities along transport corridors.

As part of the strategy a Light Rail Route Alignment is proposed in close proximity of the subject site. The Light Rail Route Alignment will provide an east-west corridor from Mahon, through the City Centre to Ballincollig. CMATS notes that this transport system will be delivered in the short-term to underpin higher development densities along the corridor.

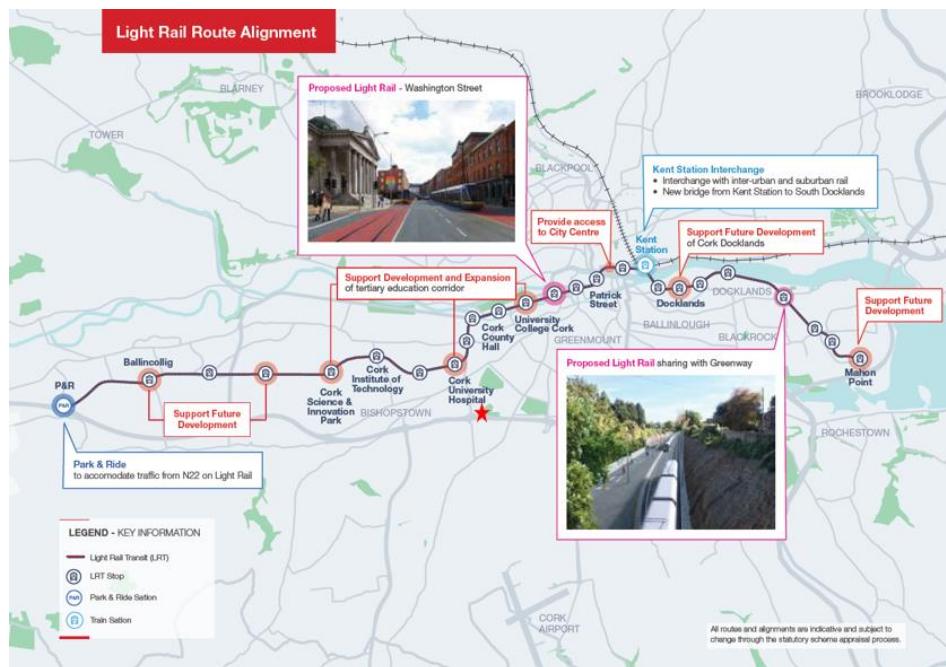


Figure 4 Light Rail Route Alignment map from CMATS- Subject site outlined in red star

3.6 Draft Cork City Development Plan 2022-2028

In the Cork City Draft Development Plan 2022 the site is proposed to be zoned for Sports Grounds and Facilities under ZO 17 where it is an objective to *"protect, retain and enhance the range and quality of sports facilities and grounds."*

The access to the site is zoned under ZO 16 Public Open Space and notes a section of the access is part of and Area of High Landscape Value



Figure 5 Extract from the Draft Cork City Development Plan Map 8

4. Rationale

The 2022 Draft Cork City Development Plan proposes to remove the site's existing residential zoning. The purpose of this submission is to request that Cork City Council reinstate the residential zoning for our client's landholding and to zone the entire site for residential use.

4.1 Suitability of site for residential development

As noted in Section 2 above, the site is located within close proximity of a range of existing services and facilities with easy access to sustainable modes of transport.

The subject site is currently zoned SE-R-13 – Medium A density residential development with subject to satisfactory vehicular and pedestrian access arrangements within the current Ballincollig Carrigaline Municipal District LAP and is suitable for immediate residential development. As part of the Draft Cork City Development Plan, it is proposed to remove the residential zoning on the lands and rezone the site for Sports Grounds and Facilities. Our client is strongly opposed to this rezoning of the site for residential development.

The subject site at Sandbrook is strategically located in proximity of Wilton District Centre and a range of services and facilities including schools, colleges, hospitals, medical centres, churches, post offices, childcare facilities, convenience shops, retail units, community centres, public houses and several amenities.

In terms of public transport, the 216-bus route is located approximately 450m to the north at Southbury Estate. Similarly, the 214, 219, 220X and 223 bus routes are located approximately 550m north west of the site outside Wilton Shopping Centre along the Sarsfield Road. There are existing footpaths and public lighting along these routes.

The Cork Metropolitan Area Transport Strategy (CMATS) 2040 was developed by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council. CMATS represents a coordinated land use and transport strategy for the Cork Metropolitan Area to cover the period up to 2040. It takes its lead from the NPF 2040 and the National Development Plan (NDP) 2018-2027 which envisages that Cork will become the fastest-growing city region in Ireland with a projected 50% to 60% increase of its population by 2040.

The Strategy provides a coherent transport planning policy framework and implementation plan to support the planning authorities land use zonings and to help promote higher densities along transport corridors. As part of the strategy a series of 'Bus Connects' corridors are proposed where existing transport corridors will be upgraded to provide priority for public bus services, including dedicated bus lanes. As can be seen from Figure 6 on the following page, a dedicated bus connects corridor is proposed along the R641 Sarsfield Road

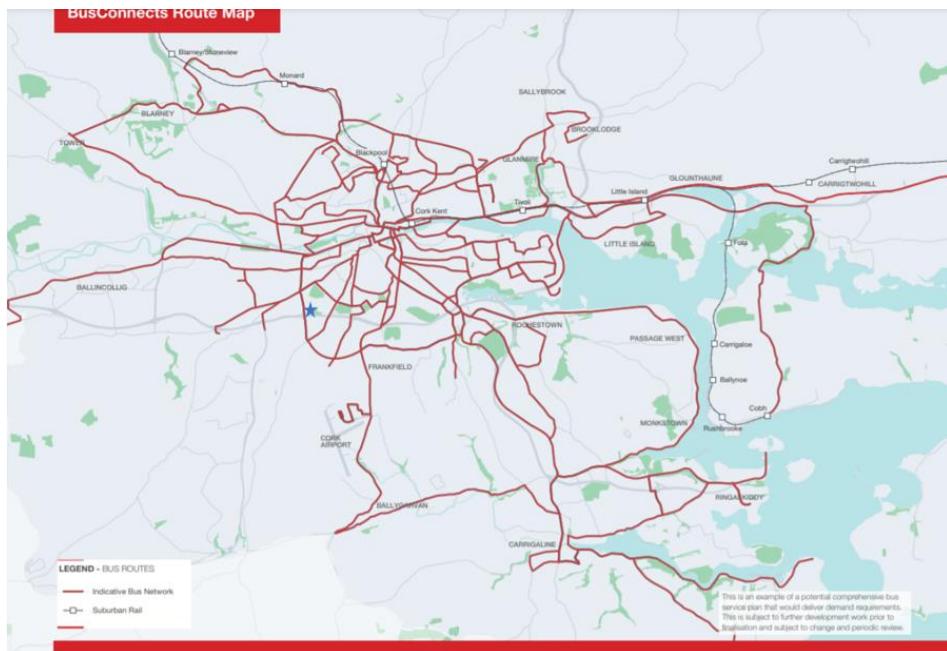


Figure 8 Extract from CMATS showing BusConnects Route – Site indicated in blue star

As shown the subject lands are located in an important strategic position within Cork City and benefit from an array of existing services. The site also has access to key infrastructure services.

It is imperative that the forthcoming development plan is cognisant of the important role Cork will play in the future in accordance with National guidance. It will be critical that the new core strategy sets robust policy guidance to ensure sufficient land is available to meet the projected increase in market demand. Furthermore, our client's site is within separate ownership of St. Finbarr's Hurling and Football Club.

Our client's site, is available and deliverable and will provide the opportunity to design residential development that prioritises walking, cycling and public transport and reduces car dependency, as well as contributing to local infrastructure improvements. This is in line with key national objectives to achieve compact and sustainable led growth.

Paragraph 4.12 of the Development Plan Guidelines advises that the following criteria should be used to determine whether a particular parcel of land should be zoned:

1. Need
2. Policy Context
3. Capacity of Water
4. Drainage and Roads Infrastructure
5. Supporting Infrastructure and Facilities
6. Physical Suitability
7. Sequential Approach
8. Environmental and Heritage Policy

The need and policy context have already been discussed above. This section will therefore address the criteria listed under items 3 to 8 above

Capacity of the Water Network & Wastewater Drainage

Our clients land at Sandbrook have access to existing foul and storm water drainage and can cater for immediate residential development. A new surface water system can be provided for the development site and can be separated from the foul water sewer network. This can be done through gravity to an attenuation tank. Similarly, a foul network can run parallel to the storm network and connect to the existing foul gravity sewer north of the subject site.

Roads Infrastructure

In relation to the strategic road's infrastructure, the R641 has been subject to recent upgrades with several other routes in the area also benefitting from infrastructure improvements. The site is also located within close proximity of the N40 South Ring Road providing direct access to several locations in Cork.

All roads in the area are of sufficient width and can cater for additional traffic resulting from the development of the subject lands.

Physical Suitability

Our clients' lands have a number of advantages that make them ideally suited for residential development. They have access to existing services and infrastructure to facilitate an immediate delivery of residential development and there is easy access to the R641 Sarsfields Road and N40 South Ring Road.

Sequential Test

The lands lie adjacent to the existing developments of Sandbrook Apartments and Southbury Road making the subject lands a natural progression for the development of the area. The subject will integrate and successfully link existing and proposed future development sites providing for a compact development form, which maximises strategic locational benefits.

Environmental and Heritage Policy

The site is not affected by any environmental and/or heritage designations and therefore is eminently suitable for development.

We therefore request that the zoning of our client's land be retained for residential use or at a minimum zoned as part of the Sustainable Residential Neighbourhoods under zoning objective Z0 01 where it is an objective to *"protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses"*.

4.2 Supporting Infrastructure

The accessibility of new development, both in terms of access to services and existing and proposed transport routes should be a key principle in terms of zoning lands for development in the forthcoming development plan. Our client's site has access to existing foul and storm water drainage and can cater for immediate residential development. The subject lands at Sandbrook

benefit from excellent connections in terms of accessibility to Wilton District Centre and surrounding key employers such as CUH, CUMH and CIT. The site is also located within proximity to existing schools and services in the area.

The subject site is well served for pedestrians with pedestrian footpaths existing along Sarsfield Road and Sandbrook Road. A cycle facility is also provided for along the Sarsfield Road connecting to other locations in the City. The footpath network extends the full length of the Sarsfield Road connecting the site to Wilton District Centre.

As part of the CMATS strategy a Light Rail Route Alignment is proposed in close proximity of the subject site. The Light Rail Route Alignment will provide an east-west corridor from Mahon, through the City Centre to Ballincollig. CMATS notes that this transport system will be delivered in the short-term to underpin higher development densities along the corridor.

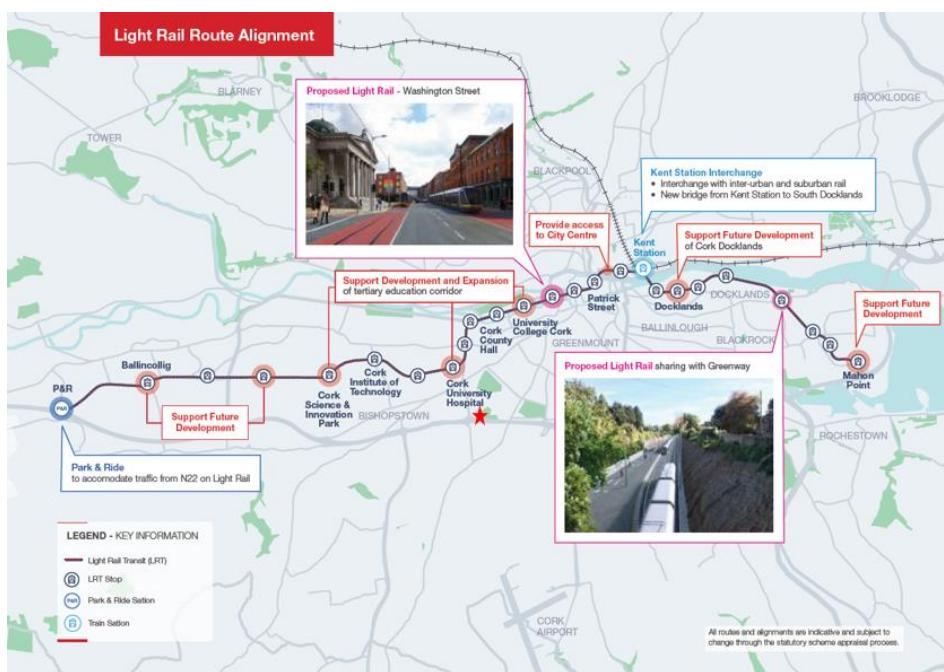


Figure 6 Light Rail Route Alignment map from CMATS- Subject site outlined in red star

The development of our clients' lands will free up lands for residential development and allow the sequential development of our client's site. This is consistent with the RSES which notes that "*where practicable, development within the metropolitan area should be carried out sequentially, and lands which are, or will be, most accessible by walking, cycling and public transport*". The integration of appropriate footpaths and cycling infrastructure, would provide a safer and more accessible environment for residents to access the town and would also enhance connectivity.

We therefore request that the zoning of our client's land be retained for residential use or at a minimum zoned as part of the Sustainable Residential Neighbourhoods under zoning objective Z0 01 where it is an objective to "*protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses*".

4.3 Compact Growth

As noted previously, the vision for Cork is to grow the city as a sustainable compact city. Sandbrook is located in the City Suburbs of Cork City. An example of this is shown in Figure 7 and 8 below where the subject lands are included within the 'Compact Growth' area. The subject site represents an area of underutilised land which is readily available for development. The site is also one of the few sites available which has the potential to accommodate residential development. The rezoning of the land would be consistent with the vision of the draft plan which promotes compact development.

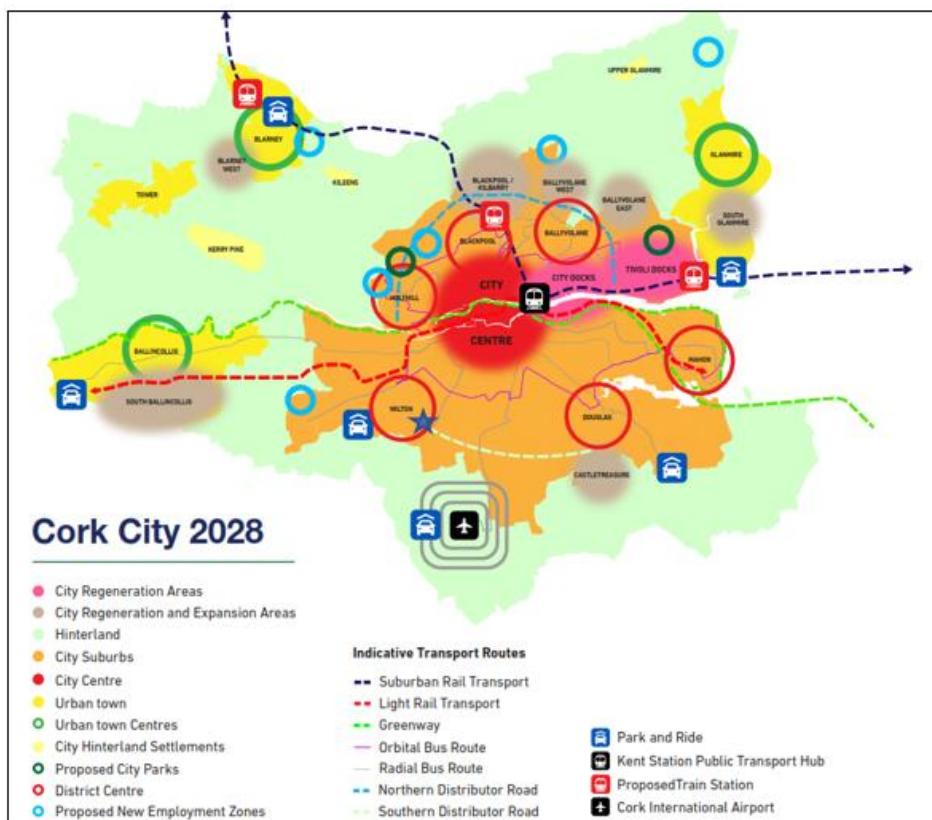


Figure 7 Extract from Draft Cork City Development Plan – Core Strategy Map. Indicative location of site marked blue star

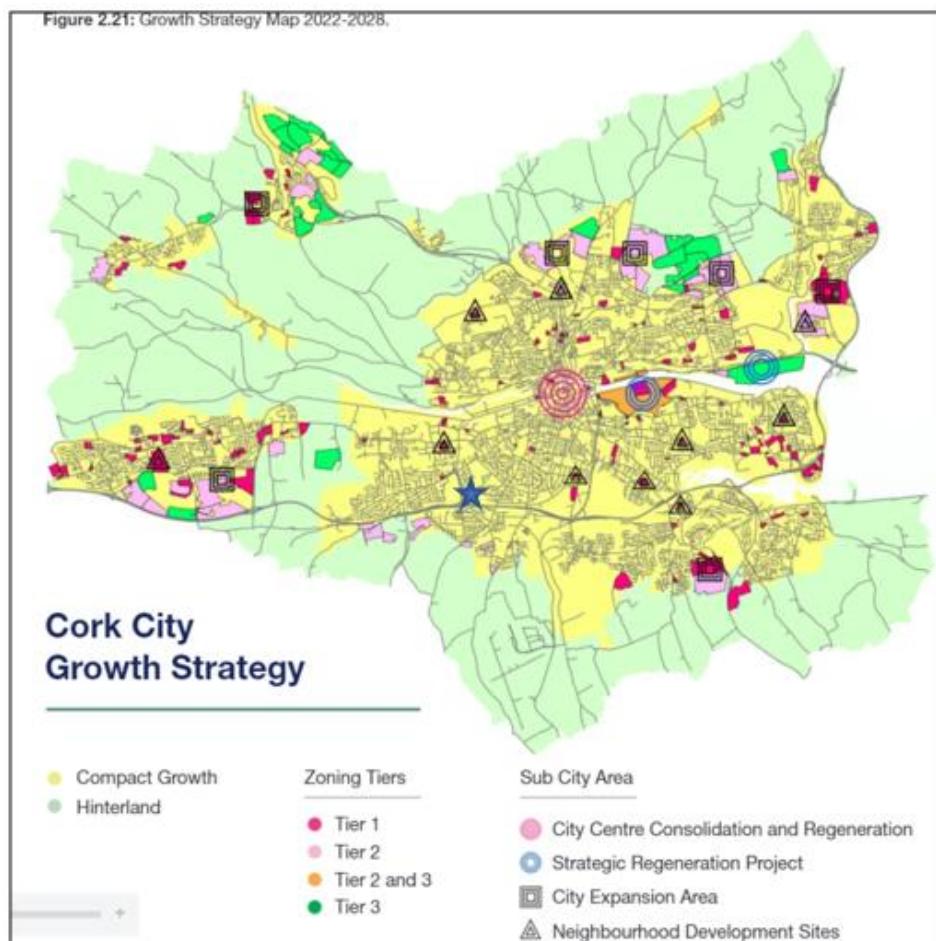


Figure 7 Extract from Draft Cork City Development Plan – Growth Strategy Map. Indicative location of site marked blue star

By zoning this land for residential development or as part of the Sustainable Residential Neighbourhoods under zoning objective Z0 01 where it is an objective to *“protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses”*, Cork will achieve its vision to 2028 to take its place as a world class city, driving local and regional growth, embracing diversity and inclusiveness and growing as a resilient, healthy, age-friendly and sustainable compact city.

We therefore request that the zoning of our client's land be retained for residential use or at a minimum zoned as part of the Sustainable Residential Neighbourhoods under zoning objective Z0 01 where it is an objective to "protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses".

5. Conclusion

On behalf of our clients, we would be grateful if this submission could be given careful consideration during the preparation of the Cork City Development Plan 2022-2028.

As set out in detail above, we submit that the forthcoming Cork City Development Plan should consider the following:

- The zoning of our clients' land to be retained for residential use in the upcoming Cork City Development Plan

We would welcome the opportunity to discuss this submission in greater detail with the City Council's planning officials. If you require any additional information, please do not hesitate to contact the undersigned.

Yours sincerely,

Andrea Mc Auliffe

Andrea Mc Auliffe

McCutcheon Halley