

Submission to Draft Cork City Development Plan 2022-2028

Amendment to Zoning at Hollyhill, Cork City
on behalf of James O' Mahony and others

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Document Control Sheet

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Table of Contents

1. Introduction	3
2. Site Context.....	3
3. Planning Policy	4
3.1 National Planning Framework – Project Ireland 2040	4
3.2 Regional Spatial & Economic Strategy for the Southern Region	5
3.3 Cork Metropolitan Area Transport Strategy (CMATS), 2020	5
3.4 Cork City Draft Plan 2022-2028.....	5
4. Rationale for Submission Request	10
4.1 Compact Settlement/Suitability of Site	10
4.2 Support Infrastructure and Employment Facilities	11
5. Conclusion	13

1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of James O' Mahony, Frank Kenny, Colm O'Connell in response to public notices inviting submissions from third parties and interested parties on the Cork County 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 including the delivery of homes in the lifeline of the plan and beyond. Accordingly, this submission requests the following provisions in the forthcoming CDP for Hollyhill:

- **The rezoning of the subject lands from 'Public Open Space' to 'ZO 03 Tier 3 Residential Neighbourhoods'**. Our client's lands are currently zoned as Public Open Space under the Draft Plan. However, it is considered that the lands are entirely suitable for future development which is addressed further in this submission.

This submission is structured as follows:

1. Introduction
2. Site Context
3. Planning Policy
4. Rationale for Submission Request
5. Conclusion

2. Site Context

Our client's lands which measure approx. 3.5ha in total lie within the North Environs of Cork City and occupy an important strategic position within Metropolitan Cork. The subject lands are surrounded by a built-up area with a mixed use of residential and business employment uses. Directly south of the site lies the headquarters of Apple Operation Europe which is Cork's largest offices and most important employers which has a population of 6,000 employees.

The subject lands currently comprise of a greenfield site and located to the east are established residential areas and a number of recreational facilities such as St Vincent's GAA and Casteleview AFC. The area has experienced significant growth in recent years due to its proximate location to the city centre, Apple, and the various business and industrial estates estate which adjoins the southern site boundary.



Figure 1. Site Location Aerial Image – lands highlighted in red

3. Planning Policy

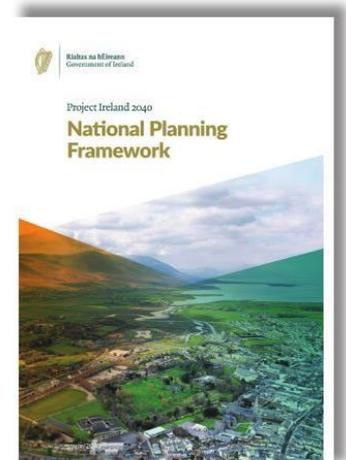
3.1 National Planning Framework – Project Ireland 2040

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 2,400 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. This compact growth model focuses on the prioritisation of housing development in locations within and **contiguous**

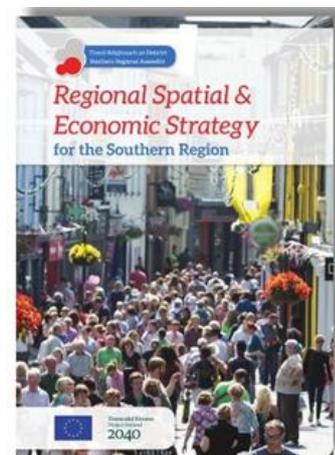


to existing urban footprints where it can be served by public transport, walking and cycling.

3.2 Regional Spatial & Economic Strategy for the Southern Region

The RSES is a strategic document which provides the roadmap for effective regional development. The RSES introduces the concept of a Growth Framework to achieve this integration because regional growth cannot be achieved in linear steps.

The sustainable growth of Metropolitan Cork requires consolidation, regeneration, infrastructure led growth and investment in each of the following locations: city centre (including the Docklands and Tivoli), potential light rail transit (LRT) corridor, strategic bus network corridor and suburban area nodal points and corridors along the Ballincollig to Mahon LRT line, district centres, **north and south environs**, Glanmire, city and suburban area expansion (sustainable and infrastructure led).



3.3 Cork Metropolitan Area Transport Strategy (CMATS), 2020

The CMATS aims to deliver an integrated transport network that addresses the needs of all modes of transport, offering better transport choices, resulting in better overall network performance and providing capacity to meet travel demand and support economic growth.

Key outcomes from the Strategy which relate to the Apple Campus include:

- Short Term (1-5 years) improvements to the bus network to include improvements to the Hollyhill (Apple Campus) to City Centre. The frequency of this service is noted as every 30 minutes;
- A Core Radial Bus Service, which will form part of the wider city BusConnects Network, connects the external corridors to the City Centre. This supporting service will include a Mahon – Apple and Rochestown – Apple service with a peak frequency on 10 minutes; and
- Four high frequency orbital services are being proposed including a Northern Orbital Route with a 10 minute frequency that will service the Apple Campus.

3.4 Cork City Draft Plan 2022-2028

The Draft Cork City Development Plan (CDP) sets out Cork City Council's policies for the development of Cork City to 2028 and beyond. It establishes the following vision for Cork City:

“The Strategic Vision is for Cork City 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 with placemaking, communities and quality of life at its heart.”

As shown in figure 2 below, the Draft Plan has indicated a proposed zoning of Public Open Space (ZO 16) for the subject lands (light green) where it is an objective to “protect, retain and provide for passive and active recreational uses, open spaces, green networks, natural areas and amenity facilities.”

The lands located to the west of our clients site which are in ownership of Apple are zoned as ‘Light Industry & Related Uses’ (dark blue) and lands to the south and west are zoned “Sustainable Residential Neighbourhood” (light yellow).

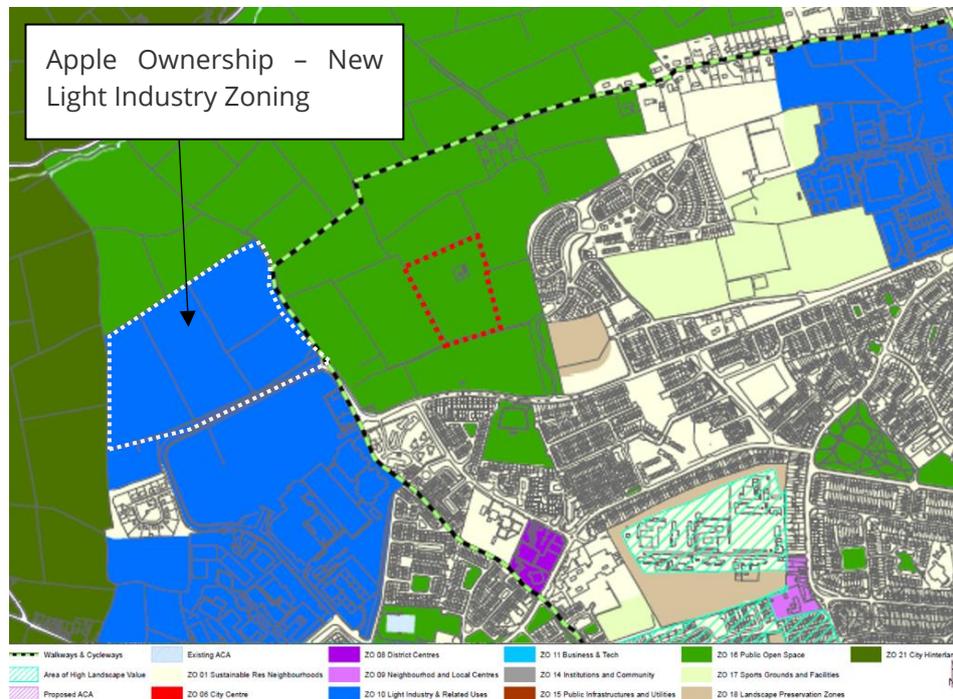


Figure 2: Extract of Zoning Map under Draft Plan – subject lands outlined in red

Under this open space objective, the following is also noted in the Plan:

ZO 16.1 – This zone includes strategic public open space and amenity lands. Lands in this zone comprise a wide range of passive and active recreational and amenity resource for the community including parks, sports and water sports, leisure facilities, amenity areas and natural areas including ecological networks, woodlands and other habitats. The primary purpose of this zone is to preserve all land in this zone for open space and amenity use.

ZO 16.2 – There is a presumption against developing land zoned Public Open Space for Alternative purposes.

ZO 16.3 – Ancillary and incidental uses such as small cafes and other amenities that add to the vitality and support the public open space and public recreational infrastructural role of an appropriate public open space, such as a park, may be open for consideration. Such ancillary and incidental service facilities shall be commensurate to the nature and scale of the public open space and must integrate with the public open space and not conflict with the primary zoning objectives.

ZO 16.4 – Many green areas in residential housing estates throughout the City function as public open spaces and amenity areas but are zoned ZO 1 Sustainable Residential Neighbourhoods (or another land use zoning objective). For zoning objectives relating to these areas, refer to Zo 1 Sustainable Residential Neighbourhoods above, and to the paragraph on ‘Open Spaces in Residential Areas’ above.

Under Table 6.11 of the Draft Plan, Hollyhill is identified as a new City Park, however the Draft Plan outlines the Proposed Park still requires a ‘Park Masterplan and planning permission during the lifetime of the Plan.’

Objective 3.3 of the Draft Plan relating to **New Housing Supply** states that:

Provision will be made for at least 17,118 new homes to be built in Cork over the Development Plan period.

Under the draft plan residential zoning has been divided into 3 tiers. ZO 3 relates to “Tier 3 Residential Neighbourhoods” with the objective being “To provide for new residential development in the long term, in tandem with the provision of the necessary social and physical infrastructure”. Under this objective the following is also noted in the Plan:

ZO 3.1 Lands in this zone are designated as longer term zoned lands. Any development proposal must satisfy the requirements for developing on Tier 3 lands set out in Chapter 2 Core Strategy, and below.

ZO 3.2 This zone covers primarily greenfield, undeveloped lands for new sustainable residential areas, mainly deliverable in the longer term. Only in exceptional circumstances will long term residential neighbourhood sites be considered for development in this Development Plan period, as substitution for Tier 1 and Tier 2 lands, and any development proposals on these lands must demonstrate:

- (i) *That tier 1 and Tier 2 services or serviceable lands zoned for residential uses are not capable of being delivered during this Development Plan period and*
- (ii) *How the proposed development lands will be serviced and delivered during this Development Plan period.*

ZO 3.3 Development in this zone, while primarily residential, must provide an appropriate mix of housing types, and tenures along with the amenity, social, community and physical infrastructure required to promote compact growth, balanced communities and sustainable, liveable communities.

ZO 3.4 Uses set out under ZO1 Sustainable Residential Neighbourhoods are appropriate under this zone subject to such uses supporting the creation of sustainable communities and not conflicting with the primary objective of this zoning.

Under 2.51 of the Draft Plan, it identifies Tier 3 lands zoned but considered as being unlikely to be serviced during the lifetime of this Plan and are considered as long-term strategic sites needing long term planning and service delivery. They are identified to ensure active land management by safeguarding and strategically planning for longer term growth needed to achieve the NPF growth targets. Table 2.4 of the Draft Plan details the location and quantum of Tier 3 lands:

Cork City - Tier 3 Lands ⁴		
Location	Underutilised Sites (Net Hectare's)	Potential Tier 3 Yield (Units)
City Centre	0.0	0
Docklands	86.9	12,527
City Docks	36.6	7,775
Tivoli Docks	50.3	4,752
City Suburb	152.8	3,008
North East Suburb	132.7	2,479
North West Suburb	0.0	0
South East Central Urban Area	0.0	0
South West Central Urban Area	20.1	529
Urban Town	161.8	5,463
Ballincollig	26.1	850
Blarney	116.5	4,071
Glanmire	13.9	332
Tower	5.3	210
Total	401.5	20,998

Table 2.4: Table of Tier 3 Lands.

Figure 3: Extract of Tier 3 Lands under Draft Plan

It is considered that the potential Tier 3 yields within the City is unbalanced in the context of locations and unsustainable with regard to the existing level of available services and facilities. Given the additional zoning of Industrial Lands (Apple's ownership) which will increase employment within Hollyhill, the additional need for housing is justified to ensure the strategic vision of the Cork City Development Plan is achieved. The rezoning of our clients' lands would encourage sustainable and active travel as future development would be in close proximity to employment uses. Chapter 4 of the Draft Plan states that there is a slightly higher than average dependency on private cars to commute to school and work at 62.6% with a lower than average uptake of 9.1% for public transportation. In line with the primary objectives of CMATS, the Draft CDP seeks to increase the modal share to public transport from its current level to over 26% by 2040. The Draft Plan indicates that there will be a focus on new residential and employment development in areas with *'...good access to the planned public transport network...'*

We therefore consider there is scope to reconsider the approach within Hollyhill and to allow for a greater degree of flexibility in how the future development and population growth is managed. It is noted that a significant quantity of land zoned as Tier 3 lands are located at more remote locations on the fringe of towns and villages such as Blarney which is contrary to national and regarding objectives to provide for compact growth (NPO3c, NS01 and RS02).

4. Rationale for Submission Request

Our client’s lands are currently zoned as the Public Open Space under the Draft Plan as shown in figure 2 above. The purpose of this submission is to request that Cork City Council zone our client’s entire landholding for residential use (Tier 3 Residential Lands). This section of the submission discusses and provides a rationale for this request.

4.1 Compact Settlement/Suitability of Site

The subject lands and surrounding area are included within the ‘North West Suburbs’. As shown in Table 2.4 of the Draft Plan, there is no provision for Tier 3 lands within the North West Suburbs during the lifetime of the plan, yet as identified within Figure 2.21 of the Draft Plan, the subject lands are included within the ‘Compact Growth’ area. It is also noted that some Tier 3 areas are located outside the compact growth area which is contrary to provisions set out in the NPF.

Figure 2.21: Growth Strategy Map 2022-2028.

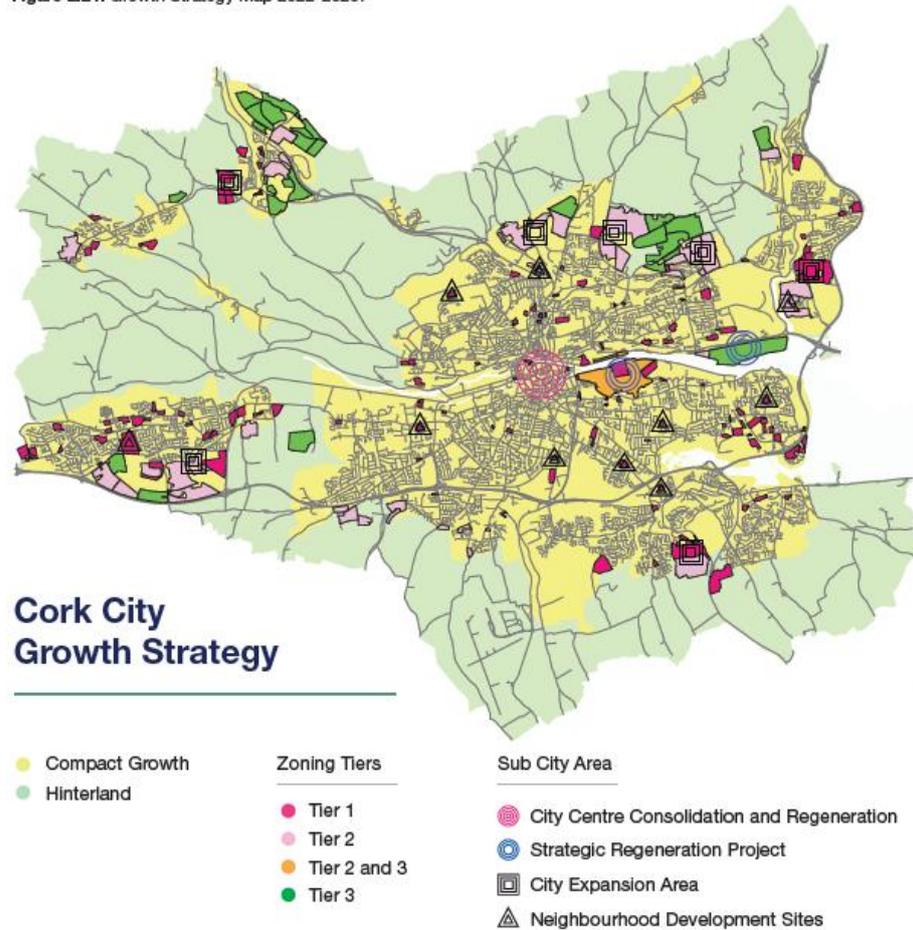


Figure 4: Extract of Figure 2.21 Growth Strategy Map 2022-2028

The strategic importance of Hollyhill (including the Apple Campus) in Cork City is undisputed and there is significant potential for capitalisation on the extant sustainable transport infrastructure, in line with national and regional policy through the activation of residential zoned development lands such as our clients lands due to the location and close proximity of employment uses. The NPF outlines the crucial importance of progressing higher density housing development on greenfield sites close to public transport corridors, particularly with regard to creating sustainable communities.

Our client welcomes the provision of an amenity route which was also outlined in the Cork County Development Plan 2014. However, the proposed pedestrian amenity route along Nashes Booreen in the Draft CDP which is located to the north of the site as shown in Figure 2 lacks security surveillance and may lead to security concerns and encourage antisocial behaviour. Our clients lands could offer passive surveillance through future design to ensure a secure and safe route will be provided within the area.

The basic premise of this submission is that Hollyhill area has been overlooked in terms of its potential to provide other uses including the expansion of residential uses to complement the existing employment uses and additional employment which will be created as part of the Draft Plan. Our clients' lands are physically suitable and have a number of advantages that make them ideally suited for future residential development. The site benefits in close proximity to one of Cork's largest and most important employers and occupies an important strategic position contiguous to the City boundary and on the City's Northern orbital route. Hollyhill comprises of one of the strongest areas of housing demand due to the high working population, young demographics and acute shortage of housing supply. The zoning of additional lands within our clients' lands will be most effective in providing housing within Metropolitan Cork.

4.2 Support Infrastructure and Employment Facilities

Within the Draft Plan, Hollyhill is designated as a strategic employment site. Given the location of the site, the future increase of employment uses due to the proposed new Industrial Zoning within Apple lands, it is considered vital to plan for the longer-term delivery of lands to be reserved within Hollyhill and protect these lands for strategic long-term growth to align with the increased employment uses within this area. It is considered that the lands are entirely suitable for Tier 3 due to the following:

- The lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs Hollyhill, Cork;
- The lands are within close proximity to the surrounding road network, public transport and existing residential and employment areas; and
- There is access to commercial, social and community services within close proximity of the lands, such as an array of retail outlets and grocery stores, medical and dental outlets, Apple Campus, Hollymount Industrial Estate, Strawberry Hill National School, as well

It is considered that the zoning of the subject lands as “Tier 3 – ZO-03: Tier 3 Residential Neighbourhood” would ensure the ambitious growth set out in the NPF. Accordingly, we request that the Council zone this this land as “ZO-03 Tier 3 Residential Neighborhood”.

5. Conclusion

- Our client’s lands occupy an important strategic position within Metropolitan Cork, forming part of the city’s suburbs at Hollyhill. The subject lands are within close proximity to major employment uses such as Apple and Hollymount Industrial Area, a surrounding road network, public transport and existing residential areas;
- Our client’s lands are currently zoned as Public Open Space under the Draft Plan. However, it is considered that the lands are entirely suitable for future development. Accordingly, we request this portion of our client’s lands be zoned as “ZO-03 Tier 3 Residential Neighbourhood”.

We respectfully request that the planning authority give consideration to the issues raised in this submission and we trust that our submission will be taken into account as part of the consultation process for the review of the Cork City Council Development Plan.