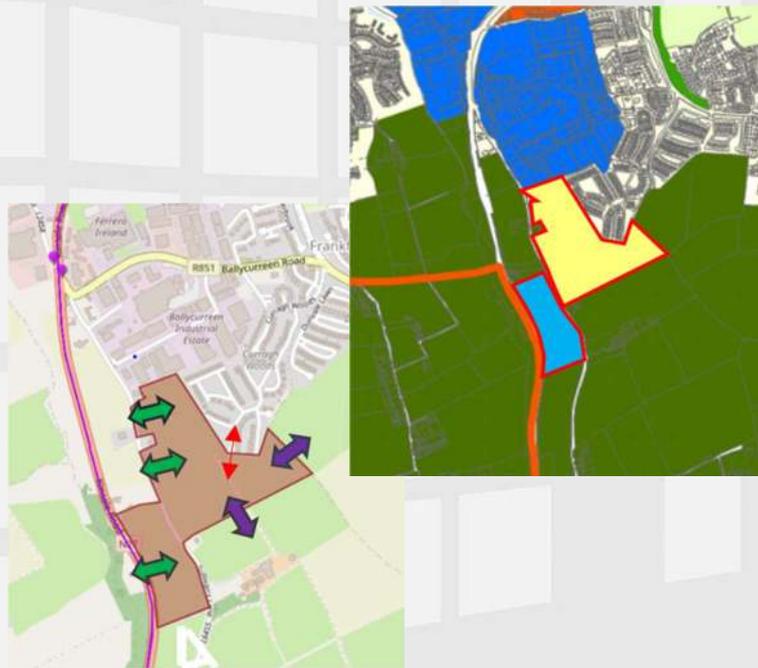


## Submission to Draft Cork City Development Plan 2022-2028

Amendment to Zoning of South City Environs at Ballycurreen, Kinsale Road

October 2021



McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS

# Document Control Sheet

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# 1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of The O’Sullivan Family 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 lifetime of the plan and beyond. Accordingly, this submission requests the following provisions in the forthcoming CDP:

- Our client’s lands occupy an important strategic position within Metropolitan Cork, forming part of the city’s suburbs at Ballycurreen, Kinsale Road. The subject lands are within close proximity to Cork Airport, the N27 and surrounding road network, public transport and existing residential and employment areas;
- Our client’s lands are currently zoned as the City Hinterland under the Draft Plan. However, it is considered that the lands are entirely suitable for development. The suitability of the north eastern portion of the subject lands for residential development has already been acknowledged by Cork County Council as they are currently zoned as a Strategic Land Reserve (SLR4) under the current Ballincollig Carrigaline MDLAP 2017.
- In addition, objective 3.3 of the Draft Plan states that provision will be made for at least 17,118 new homes to be built in Cork over the Development Plan period, 2,752 of which are envisaged for the Southeast Suburbs.
- Accordingly, we request this portion of our client’s lands be zoned as “ZO-02: *New Residential Neighbourhood*”.
- The western portion of the subject lands adjoin the N27 providing excellent connectivity to the national road network as well as Cork Airport and surrounding employment areas. The subject lands are within close proximity to zoned Industrial lands to the north as well as the existing “Business and Tech” zoned lands of Cork Airport Business park to the southwest and Airway Technology Park to the south. Accordingly, we request that the western portion of the subject lands be zoned as “ZO-11: Business & Technology”

This submission is structured as follows:

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

## 2. Site Context

Our client's lands which measure approx. 17.2ha in total lie within the South Environs of Cork City and occupy an important strategic position within Metropolitan Cork. The subject lands are located on the eastern side of N27 approx. 1km southwest of Kinsale road roundabout, approx. 3.8km south of Cork City Centre and 2km northeast of Cork airport. The subject lands currently comprise relatively flat to gently sloping agricultural land within the townland of Ballycurreen and bound long established residential areas to the northeast with further undeveloped agricultural lands to the south. The area has experienced significant growth in recent years due to its proximate location to the city centre, Cork airport, Cork Airport Business park and the various business and industrial estates including Ballycurreen Industrial estate which adjoins the northern site boundary. The subject lands are highly accessible adjoining the national road network and local road Sullivan's lane and are in close proximity to 2 no. frequent bus routes / stops (routes 226A & 206).



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

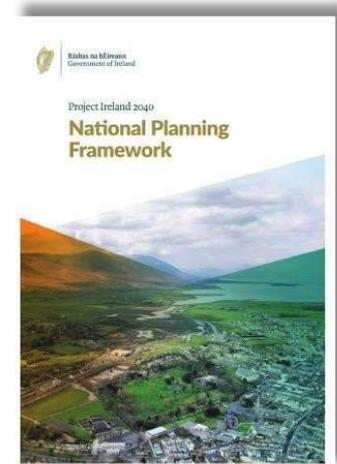
## 3. Planning Policy

### 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.

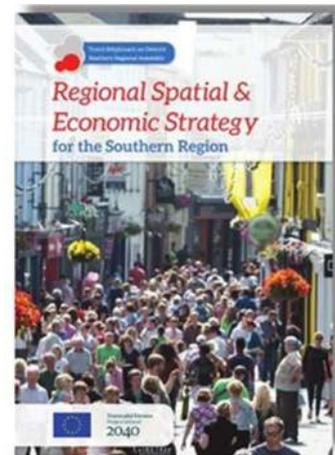
According to the National Development Plan, Cork is expected to increase its population by 125,000 by 2040, which will require the provision of additional housing to accommodate 2,400 people every year up to 2040.



### 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.

RSES 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.



### 3.3 Ballincollig Carrigaline MDLAP 2017

Up until the City Boundary extension in 2019, the subject lands were part of Cork County and under the existing Ballincollig Carrigaline Municipal District Local Area Plan 2017, the northeastern portion of the subject lands are zoned as a Strategic Land Reserve – SLR4 Frankfield /Grange as shown on the following page in figure 2. This zoning by Cork County Council acknowledges the development potential of the subject lands for residential development.

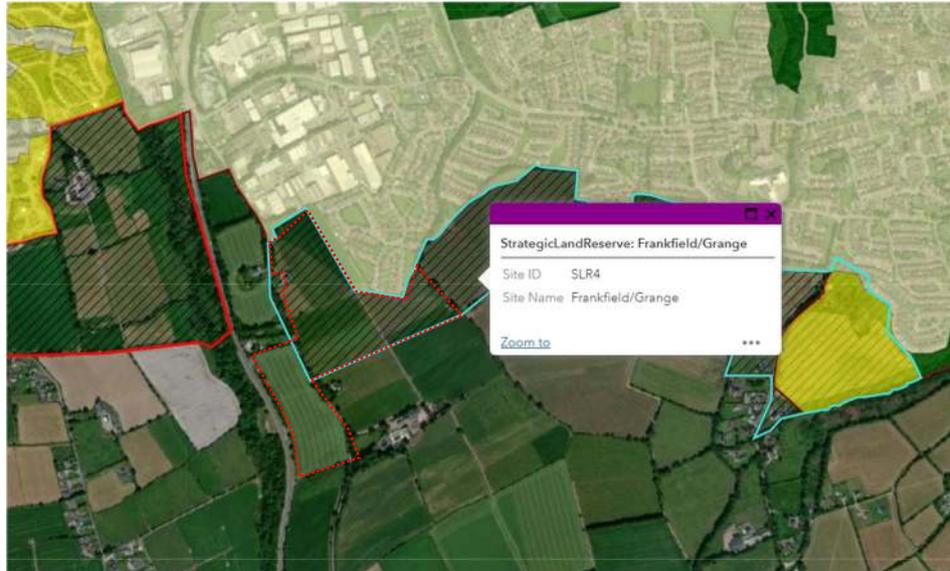


Figure 2: Northeastern portion of lands were zoned within SL4 under MDLAP2017- subjected lands outlined by dotted red line

### 3.4 Cork City Draft Plan 2022-2028

The Draft Plan has indicated a proposed zoning of City Hinterland for the subject lands (dark green) where it is an objective to “protect and improve rural amenity and provide for the development of agriculture.” The lands immediately north are zoned as ‘Light Industry & Related Uses’ (dark blue) and “Sustainable Residential Neighbourhood” (light yellow) while there is a large “Business & Tech” zoning (light blue) at Cork Airport Business Park to the southwest.



Figure 3: Extract of Zoning Map under Draft Plan – subject lands outlined in red

Under this objective the following is also noted in the Plan:

*ZO 21.1 - The primary objective of this zone is to preserve the character of the City Hinterland generally for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity. Rural-related business activities which have a demonstrated need for a rural location are also permissible. Any development associated with such uses should not compromise the specific function and character of the City Hinterland in the particular area.*

*ZO 21.2 - Other uses open for consideration in this zone include renewable energy development (wind turbines, solar farms), tourism uses and facilities, garden centres and nurseries, cemeteries and community and cultural uses, market gardening and food production ancillary to agricultural uses.*

*ZO 21.3 - The City Hinterland helps to maintain a clear distinction between urban areas and the countryside and avoid the harmful impacts of urban sprawl.*

*ZO 21.4 - Single housing in the City Hinterland will be facilitated only where the objectives and requirements on rural housing set out in Chapter 3 Delivering Homes and Communities are met. Housing must be based on exceptional rural housing need and on the core considerations of demonstrable economic or social need to live in a rural area. Other considerations including siting and design criteria are also relevant.*

Under the draft plan residential zoning has been divided into 3 tiers. ZO2 relates to "New Residential Neighbourhoods" with the objective being "to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure".

Under this objective the following is also noted in the Plan:

*ZO 2.1 Lands in this zone are designated as Tier 1 or Tier 2 zoned lands in the Core Strategy. Any development proposals must satisfy the requirements for developing on Tier 1 or Tier 2 lands set out in Chapter 2 Core Strategy.*

*ZO 2.2 This zone covers primarily greenfield, undeveloped lands for new sustainable residential areas. 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 2.3 Uses set out under ZO 1 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.*

**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 the objective for the **‘Business & Technology’** zoning ZO:11 states that it is an objective:

*“to provide for the creation and protection of high technology related office-based industry and enterprise, to facilitate opportunities for employment creation.”*

Under this objective the following is also noted in the Plan:

*ZO 11.1 The main purpose of this zoning objective is to facilitate opportunities for high technology office -based industry, advanced manufacturing, major office and research and development-based employment.*

*ZO 11.2 Primary uses could include software development, information technology, green technologies, creative technologies and emerging industries, telemarketing, commercial research and development, data processing, publishing and media recording and media associated activities. General offices where each office unit is in excess of 1,000 square metres is open for consideration in this zone subject to the objectives set out in Chapter 7 Economy and Employment.*

*ZO 11.3 Other uses that may be acceptable in this zone, subject to local considerations, include light industrial uses set out under ZO 10 Light Industry and Related Uses, primary healthcare centres and hospitals and commercial laboratories. Secondary uses such as residential uses, childcare facilities, leisure facilities and small-scale local services, where they serve the local area, are open for consideration at an appropriate scale where they are subsidiary to the main employment uses and do not conflict with the primary zoning objectives.*

*ZO 11.4 General industry and retailing will not normally be permitted in this zone.*

*ZO 11.5 Development proposals in this zone must create a high-quality built and landscaped environment and make use of sustainable energy solutions.*

### 3.5 Draft Cork Joint Housing Strategy & Housing Need Demand Assessment July 2021

Under the Draft Cork Joint Housing Strategy & Housing Need Demand Assessment July the subject lands are included within the South-East Suburbs and had a population of 51,605 in 2016 (24.5% of the total City population). The Cork City Development Plan 2022-2028 sets a population target of 58,457 by 2028 for the area, an increase of 6,852 or 13%, and a housing target of 2,752 units. It is stated that The South-East Suburbs are likely to deliver a mix of greenfield and brownfield or infill sites. Given the scale of land available, the area will be critical for delivering on all forms of housing need for Cork City across housing tenure, type and size. The South-East Suburbs currently have a mixed social profile including in terms of tenure, with owner-occupation predominant in areas like Frankfield and Turner’s Cross but higher concentrations of social housing in Mahon. The availability of development land entails that the South-East Suburbs will be important for delivering social and affordable housing for the City across all streams including Part V delivery and direct delivery, ensuring a continued social mix in the area overall.

## 4. Rationale for Submission Request

Our client’s lands are currently zoned as the City Hinterland under the Draft Plan as shown in figure 3 on p7 of this report. However, throughout Chapter 2 (Core Strategy) the subject lands and surrounding area are also included within the ‘South East Suburbs’. An example of this is shown in figure 4 where the subject lands are included within the ‘Compact Growth’ area with the ‘Hinterland’ shown to be further south to Cork Airport.



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

It is important to highlight that section 2.30 p39 of the Draft Plan notes that:

*“In preparing this Plan, Cork City Council carried out a series of supporting strategies and studies that provide an evidence-based approach to planning and, where possible, to reflect on best international practice.”*

This acknowledges that the subject lands are entirely suitable for development. Our subject lands occupy an important strategic position within Metropolitan Cork, forming part of the city’s suburbs at Ballycurreen, Kinsale Road. The subject lands are within close proximity to Cork Airport, the N27 and surrounding road network, public transport and existing residential and employment areas. 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, Scoil Niocláis Primary School as well as a number of creches and Montessori’s, Frankfield Golf Club and Cork Harlequins Hockey and Cricket Club.

There are existing footpaths and public lighting within 350m of the north-western corner of the subject lands along Sullivan’s lane. In addition, there is scope for multiple access points into the overall subject lands from both surrounding public roads as indicated by the purple as well as adjoining lands as indicated by the green arrows and existing residential development (red arrow) in figure 4 below.

In terms of public transport, the subject lands are in close proximity to 2 no. frequent bus routes / stops (routes 226A & 206) indicated by the purple line and bubbles below in figure 4.

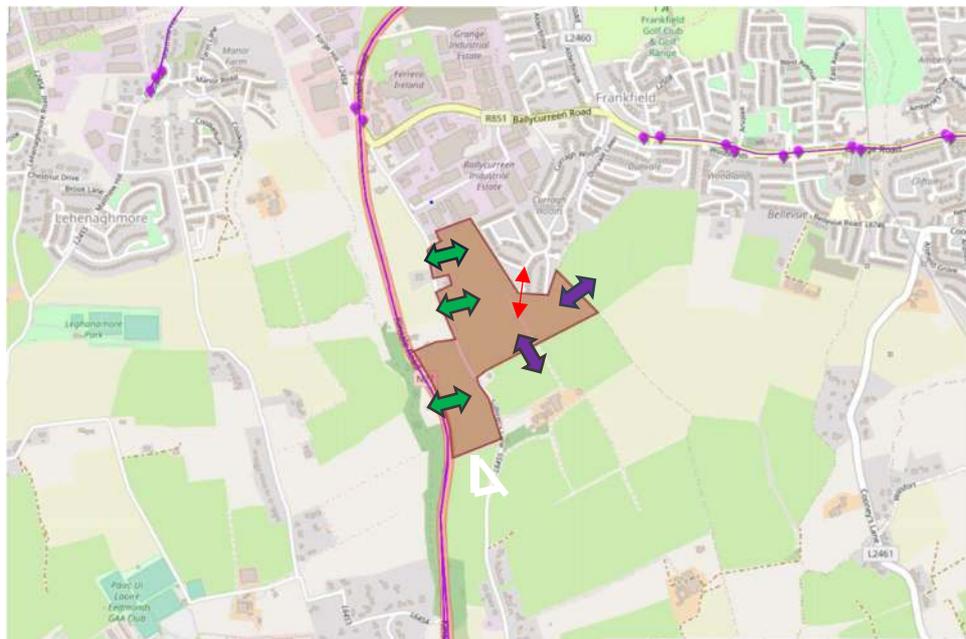


Figure 4: Location of services/facilities in context of site. Site highlighted in red.

The suitability of the north eastern portion of the subject lands for residential development has also already been acknowledged by Cork County Council as they are currently zoned as a Strategic Land Reserve (SLR4) under the current Ballincollig Carrigaline MDLAP 2017. It is considered that the zoning of this north-eastern section of the subject lands as “Tier 2 – ZO-02: New Residential Neighbourhood” would ensure the ambitious growth targets set out in the NPF.

Accordingly, we request that the Council zone this area as "ZO-02 New Residential Neighbourhood" as shown in yellow in figure 5 on the following page.

The western portion of the subject lands adjoin the N27 providing excellent connectivity to the national road network as well as Cork Airport and surrounding employment areas. The subject lands are within close proximity to zoned Industrial lands to the north as well as the existing "Business and Technology" zoned lands of Cork Airport Business park to the southwest and Airway Technology Park to the south. Accordingly, we request that the western portion of the subject lands be zoned as "ZO-11: Business & Technology" as shown in light blue in figure 5 below:



Figure 5: Proposed Zoning for subject lands – yellow area as ZO-2 New Residential and blue area as ZO-11 Business & Technology

## 5. Conclusion

- Our client's lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs at Ballycurreen, Kinsale Road. The subject lands are within close proximity to Cork Airport, the N27 and surrounding road network, public transport and existing residential and employment areas;
- Our client's lands are currently zoned as the City Hinterland under the Draft Plan. However, the lands are also included within the 'South East Suburbs' throughout the Core Strategy Chapter of the Draft Plan. The draft plan sets a population target of 58,457 by 2028 for the area, an increase of 6,852 or 13%, and a housing target of 2,752 units. It is stated that the availability of development land entails that the South-East Suburbs will be important for delivering social and affordable housing for the City across all streams including Part V delivery and direct delivery, ensuring a continued social mix in the area overall.

- it is considered that the lands are entirely suitable for development. The suitability of the north eastern portion of the subject lands for residential development has already been acknowledged by Cork County Council as they are currently zoned as a Strategic Land Reserve (SLR4) under the current Ballincollig Carrigaline MDLAP 2017. Accordingly, we request this portion of our client's lands be zoned as "ZO-02: "New Residential Neighbourhood".
- The western portion of the subject lands adjoin the N27 providing excellent connectivity to the national road network as well as Cork Airport and surrounding employment areas. The subject lands are within close proximity to existing zoned Industrial lands to the north as well as the existing "Business and Tech" zoned lands of Cork Airport Business park to the southwest and Airway Technology Park to the south. Accordingly, we request that the western portion of the subject lands be zoned as "ZO-11: Business & Technology".

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.