

Submission to the Draft Cork City Development Plan

For Development at Shean Lower, Blarney, Co. Cork

on behalf of Horgan Family Partnership

October 2021



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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 Horgan Family Partnership and relates to lands at Shean Lower, Blarney, Co. Cork. 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 Blarney:

- The re-zoning of our clients' lands from 'ZO 03 Tier 3 Residential Neighbourhoods' to '**ZO 02 New Residential Neighbourhood**' 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.7km to the north east of Cork City centre at Shean Lower, Blarney. The site is currently an unutilised piece of residentially zoned lands within the urban fabric of Blarney and Cork City comprising trees and scrub. The site is irregular in shape and is bound by the R617 and detached residential dwellings to the south, to the east and north by agricultural land and Ring Wood and to the west by detached residential dwellings. A number of services and facilities are located within 300m walk of the subject site at Ashdale House including a Medical Centre, Pharmacy, retail outlets, restaurants, service station, ATM and hairdressers.

The site is located in close proximity to the 215-bus route connecting the site to Cork City Centre and Jacobs Island. The site is also located in close proximity of schools, amenity areas and Blarney GAA Grounds. The site also benefits from immediate access to a public footpath network on the R617.



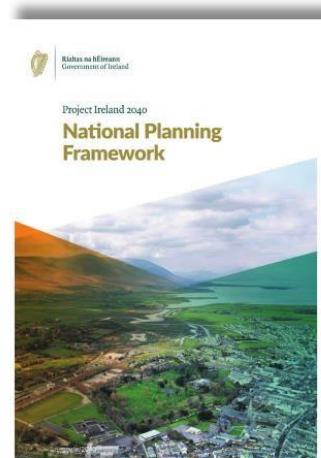
Figure 1 Clients landholding at Shean Lower, Blarney, Co. Cork

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.

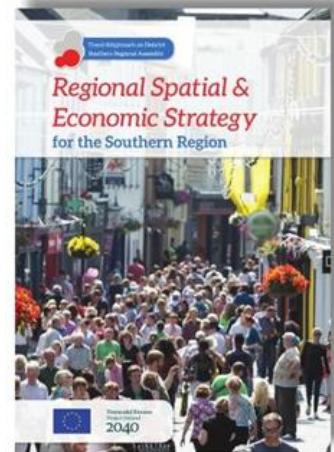
The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. According to the NDP, a key tenet to achieving these ambitious housing targets is through compact growth and targeting a greater portion (40%) of 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 identifies Cork City as a national primary driver and an engine of economic and population growth. The sustainable growth of Corks requires strengthened regional connectivity to enhance the integration for the Cork Metropolitan area with the Atlantic Economic corridor. This will regenerate and develop Cork as a smart city and metropolitan area, enhance high quality environment, vibrant city centre, compact suburbs and metropolitan towns.



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 Metropolitan Area Transport Strategy 2020

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 Bus Connects Corridor is to be established in close proximity of the subject site. the Bus Connect Corridor will provide the delivery of crucial bus corridors, enhanced services, cashless fares and account-based ticketing.

This supporting service will include a Mahon - Blarney service with a peak frequency of 10 minutes.

Similarly, a Suburban Rail network is to be developed to support the needs across the Cork Metropolitan Area. this strategy proposed to maximise opportunities offered by the existing suburban rail network and maximise the potential of the rail corridor which will further support the better integration of land use planning and public transport. It is envisaged that a Park and Ride station and associated rail line will be developed at Blarney/Stoneview.



Figure 2 Extract from CMATS showing suburban rail network.

3.4 Cork County Development Plan 2014

The Cork County Development Plan (CCDP) 2014 establishes a hierarchical network of settlements in the County, allocating related population and housing growth projections. The CCDP identifies Blarney as a Metropolitan Town within the Metropolitan Cork Strategic Planning Area. Policy CS 3-1 emphasises the strategic aim of achieving growth the Metropolitan towns:

Critical population growth, service and employment centres within the Cork "Gateway", providing high levels of community facilities and amenities with infrastructure capacity high quality and integrated public transport connections should be the location of choice for most people especially those with an urban employment focus

Objective CS 4-1 of the Plan notes the following in relation to Blarney:

In the Cork Gateway, development to provide the homes and jobs that are necessary to serve the planned population will be prioritised in the following locations, Carrigaline (Shannon Park), Midleton (Waterock) and Carrigtwohill (North of the Railway), Ballincollig (Maglin), North Environs (Ballyvolane), Glanmire (Dunkettle), Blarney (Stoneview), Monard and Cobh.

Details of the proposed development will be set out in Master Plan studies and Local Area Plans as appropriate.

Paragraph 14.3.2 of the Cork County Development Plan details that proposals brought forward in such areas shall be considered in relation to the following:

Within the development boundaries of the main towns, in areas that are not subject to specific zoning objectives, proposals for development will be considered in relation to the following:

- *The objective of this plan;*
- *Any general or other relevant objectives of the relevant local area plan;*
- *The character of the surrounding area; and*
- *Other planning and sustainable development considerations considered relevant to the proposal or its surroundings.*

It is the Council's policy to limit 'one-off housing' in the Metropolitan Greenbelt. Our clients' site, which will make provision for a small number of units or serviced sites will create a **credible alternative** to one-off rural housing in close proximity of an existing town centre, thereby, reducing the pressure for housing in unserved greenbelt locations in this part of Metropolitan Cork.

3.5 Blarney Macroom Municipal District Local Area Plan 2017

The site is located within the townland of Shean Lower within the Blarney Development boundary. Blarney is identified as a Main Town in the Blarney Macroom Municipal District Local Area Plan (LAP) 2017.

The site is zoned BL-R-08 in the current LAP where it is an objective to provide:

Medium B Density Residential Development with provision for pedestrian and cycleway linkages to adjoining residential and open space areas.

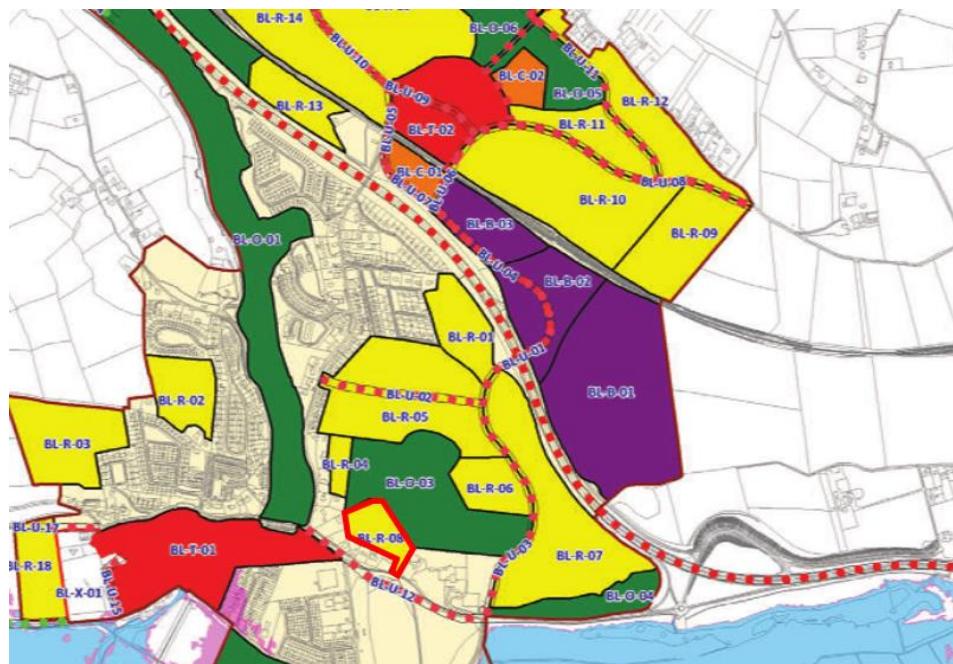


Figure 3 Extract from the Blarney Macroom LAP - Site outlined in red

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 Tier 3 Residential Neighbourhoods under ZO 03 where it is an objective to *"provide for new residential development in the long term, in tandem with provision of the necessary social and physical infrastructure."*

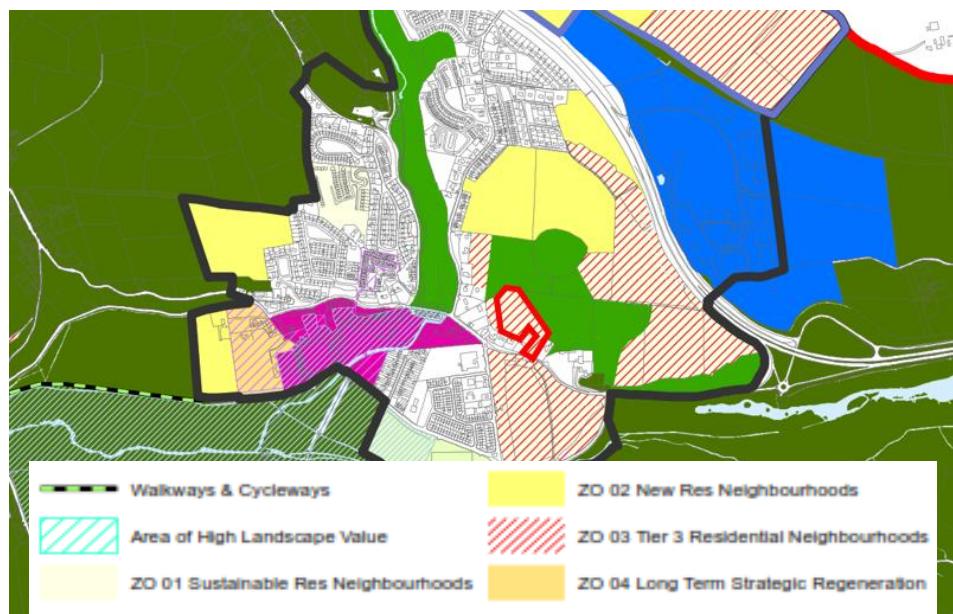


Figure 4 Extract from the Draft Cork City Development Plan Map 11

The following is also noted under this objective:

ZO 3.1 - *Lands in this zone are designated as longer-term zoned lands. Any development proposals 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 serviced 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 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.

Section 12.13 of the draft CDP (Tiered Approach to Land Zoning) states that the City Council have taken a tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the Plan. Tier 1 comprises serviced zoned lands that is sufficiently serviced to accommodate new development. Tier 2 lands are serviceable zoned lands that are not currently fully serviced but have the potential to become fully serviced within the life of the Plan. The draft CDP also includes a Tier 3, which are strategic lands necessary for long-term planning of infrastructure, given the ambition growth target set out in the NPF, but also provide for substitution of Tier 1 or Tier 2 lands that do not come forward for development within this Plan period, where appropriate.

4. Rationale

The 2022 Draft Cork City Development Plan proposes to remove the sites existing residential zoning. The purpose of this submission is to requests that Cork City Council re-zone our clients' lands from 'ZO 03 Tier 3 Residential Neighbourhoods' to '**ZO 02 New Residential Neighbourhood**' in the upcoming Cork City Development Plan.

4.1 Suitability of site for residential development

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

The subject site is currently zoned BL-R-08 - Medium B density residential development with provision for pedestrian and cycleway linkages to adjoining residential and open space areas within the current Blarney Macroom Municipal District LAP and is suitable for **immediate residential development**. As part of the Draft Cork City Development Plan, it is proposed to rezone the site for Tier 3 Residential Neighbourhoods. Our client is strongly opposed to this rezoning of the site for residential development.

The subject site at Shean Lower is strategically located within proximity of Blarney Town Centre with a range of services and facilities available including schools, medical centre, churches, shops, retail units and restaurants along with several amenities.

In terms of public transport, the 215-bus route is located approximately 300m to the south west of our client's site on the R617. 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 5 below, a dedicated bus connects corridor is proposed along the R617.

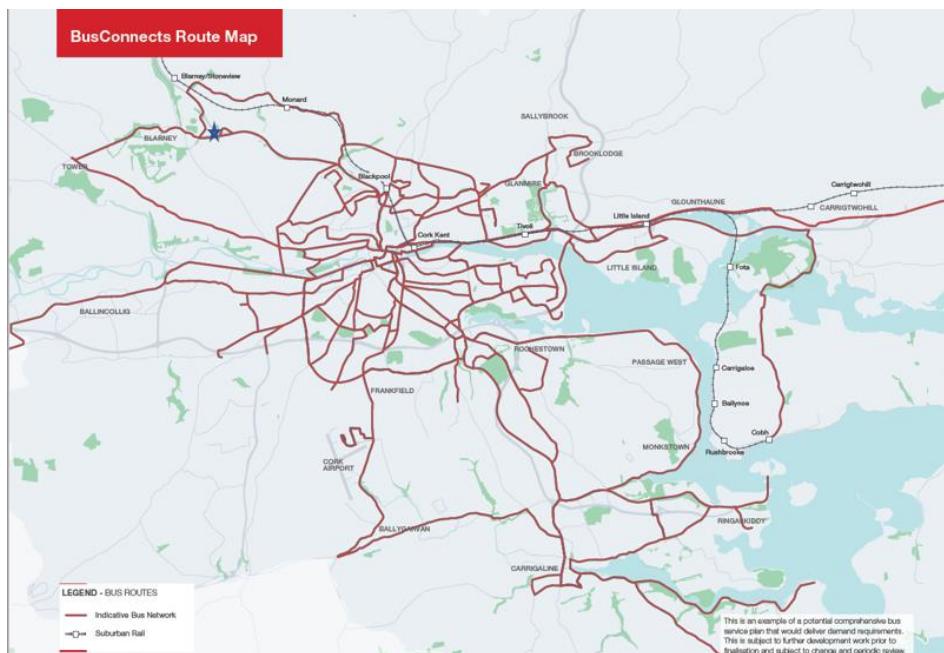


Figure 5 Extract from CMATS showing BusConnects Route – Site indicated in blue star

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 localised 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 Shean Lower 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. the site is located 90m from an existing foul sewer network with sufficient capacity for development. Similarly, Irish Water confirmed in 2019 that capacity was available to the Irish Water network for over 50 residential units.

Roads Infrastructure

In relation to the strategic road's infrastructure, the R617, 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 N20 national Road providing direct access to Cork, Mallow and several other locations in the City and County.

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 R617 and N20 and are within easy walking distance of the town centre.

Sequential Test

The lands lie in proximity of the existing services and facilities of Blarney town centre making the subject site a sequential and 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. In considering this submission, it is important to point out that our clients lands are located closer to the town centre than a number of site zoned 'ZO 02 New Residential Neighbourhood'.

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 ZO 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 Shean Lower benefit from excellent connections in terms of accessibility to Blarney Town Centre and surrounding employers. 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 the R617 and links up to the Town Centre.

As part of the CMATS strategy a Suburban Rail Route and BusConnects corridor is proposed in close proximity of the subject site. CMATS notes that this transport system will be delivered in the short-term to underpin higher development densities along the corridor.

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. Shean Lower is located in close proximity of the centre of Blarney town and is denoted in the Draft Plan as an urban town. An example of this is shown in Figure 6 and 7 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 immediate residential development. The rezoning of the land to 'ZO 02 New Residential Neighbourhood' would be consistent with the vision of the draft plan which promotes compact development.

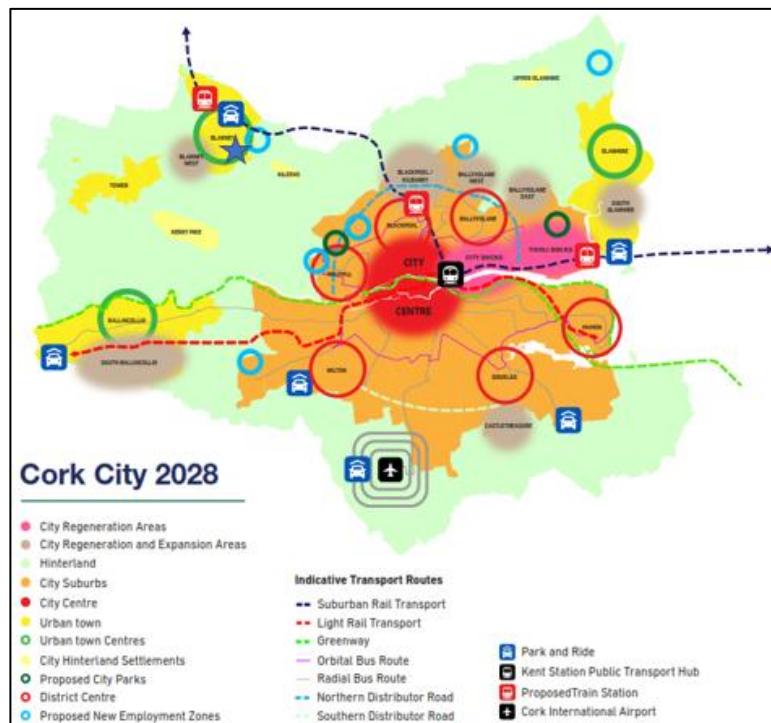


Figure 6 Extract from Draft Cork City Development Plan – Core Strategy Map. Indicative location of site marked blue star

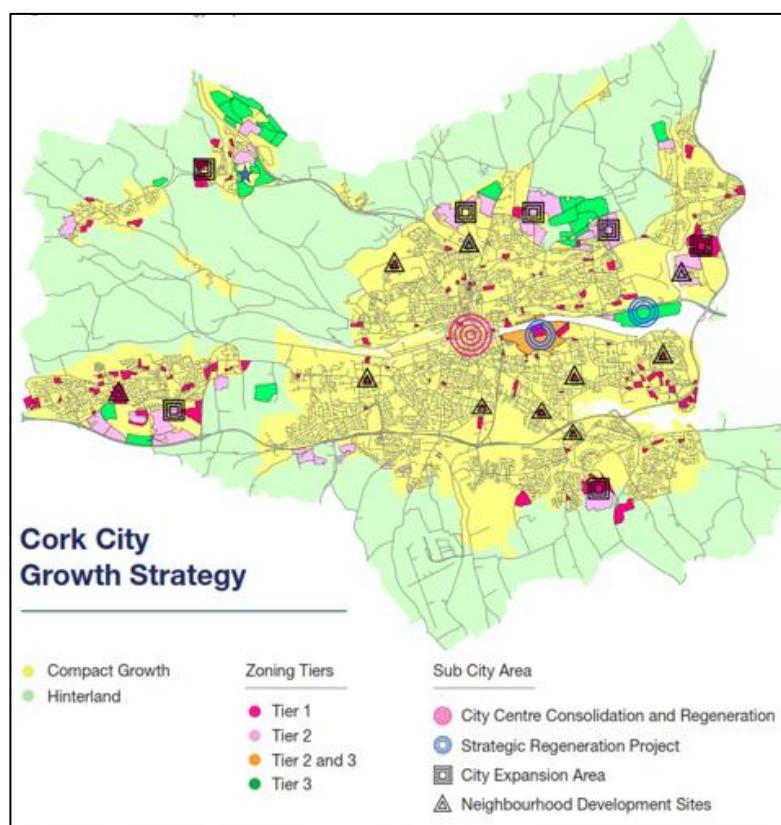


Figure 7 Extract from Draft Cork City Development Plan – Growth Strategy Map. Indicative location of site marked blue star

Furthermore, it is important to note that the land zoned ZO 02 New Residential Neighbourhoods to the west of the Blarney development boundary have both been subject to recent refusals by Cork City Council and An Bord Pleanála under Ref. No.'s (20/39597 and ABP-308156-20).

By zoning this land for residential development or as part of the Sustainable Residential Neighbourhoods under zoning objective ZO 02 where it is an objective to *"provide for new residential development in tandem with the provision of the necessary social and physical infrastructure"*, 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 ZO 02 where it is an objective to "provide for new residential development in tandem with the provision of the necessary social and physical infrastructure."**

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 re-zoning of our clients' land from 'ZO 03 Tier 3 Residential Neighbourhoods' to '**ZO 02 New Residential Neighbourhood**' 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 McAuliffe

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McCutcheon Halley