

Submission to the Draft Cork City Development Plan

For Development at Coolymurraghure, Kerry Pike,
Cork

on behalf of Niall Twomey

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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 Niall Twomey and relates to lands at Coolymurragh, Kerry Pike, 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 Kerry Pike:

- Our client's lands are currently zoned as the City Hinterland under the Draft Plan. However, it is considered that the northern portion of our client's lands are suitable for development and should be afforded as *Tier 2 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 to the south of Kerry Pike village centre. The site is located to the west of Clonlara estate which is currently under construction and located to the south of Michelscourt Estate. The site is located approximately 350metres to the west of Clogheen National School and approximately 400 metres to the south west of Gleann na Laoi GAA Grounds.

The site is within easy walking distance to the centre of Kerry Pike village. The site is also located approximately 4.5km to the south of Blarney and 7km to the northwest of Cork City Centre. The area surrounding the site is characterised by a mix of uses, but is primarily residential in character, with the lands immediately adjoining the site to the north, west and east having all been developed for residential uses comprising a mix of house types. To the south and south west lie agricultural lands.



Figure 1 Extent of our client's landholding at Coolymurragh, Kerry Pike, Cork

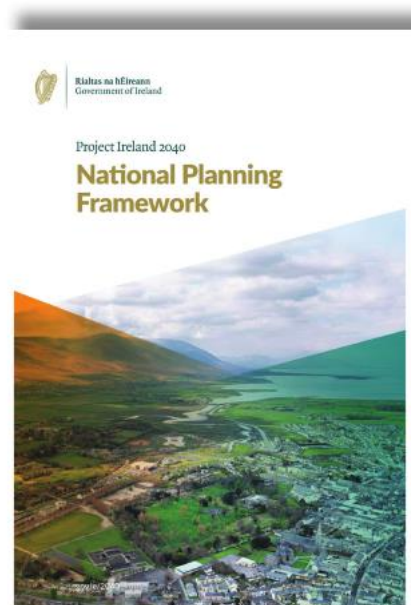
3. Planning Policy

3.1 Project Ireland 2040 – National Planning Framework (NPF)

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 over 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. 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.

Key Facts and Figures:

- The Population of Ireland will increase by around one million people or by 20 % over 2016 levels by 2040;
- The population aged over 65 will more than double; and
- Need for at least an additional half a million new homes by 2040.

Compact Growth Objectives:

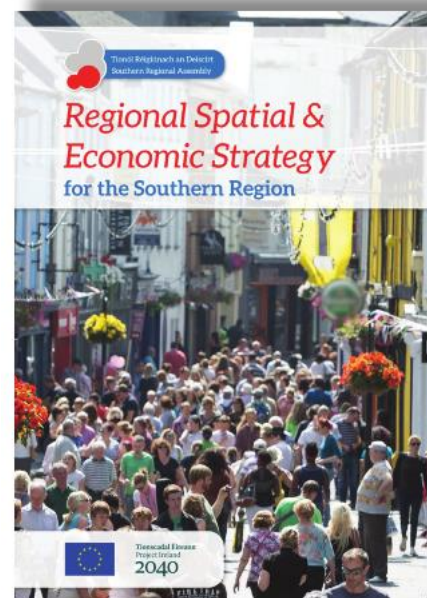
- Targeting a greater portion (40%) of future warehousing development to be within and close to the existing 'footprint' of built-up areas; and
- Future homes are required to be located where people have the best opportunities to access a high standard quality of life.

The NPF further notes that is a core strategy to reverse town and village and rural population decline by encouraging new roles and functions for buildings, streets and sites.

3.2 Regional Spatial & Economic Strategy for the Southern Region (RSES)

The 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.

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.

A key outcome from the Strategy which relates to Kerry Pike includes:

- 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 Kerry Pike – Apple – City Centre service with a peak frequency of 10 minutes

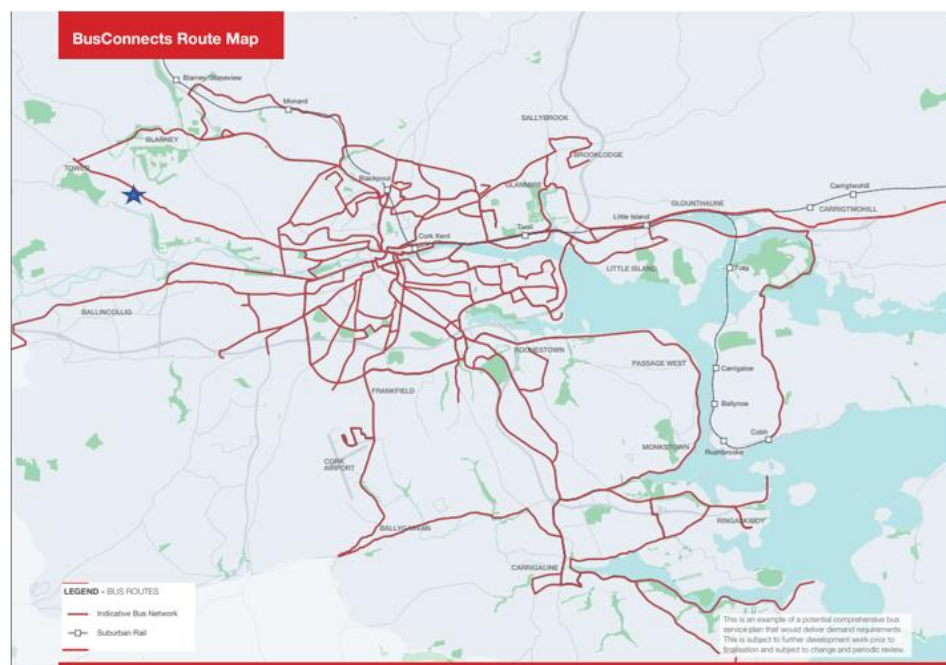


Figure 2 Extract from CMATS showing BusConnects Route – Site indicated in blue star

3.4 Cork County Development Plan 2014

While the site is located within the Cork City Councils administrative boundary, the policy for the area is the Cork County Development Plan 2014 and the Cobh Municipal District Local Area Plan 2017. The upcoming policy for the site will be the Cork City Development Plan 2022.

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 Kerry Pike as being a 'village' in the Metropolitan Cork Strategic Planning Area. Policy CS 3-2 emphasises the strategic aim of achieving growth in villages:

Encourage and facilitate development at a scale, layout and design that reflects the character of each village, where water services and waste water infrastructure is available and support the retention and improvement of key social and community facilities within villages, including the improved provision of interurban public transport.

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, thereby, reducing the pressure for housing in unserved greenbelt locations in this part of Metropolitan Cork.

3.5 Cobh Municipal District Local Area Plan 2017

The site is located within the townland of Coolymurragh in Kerry Pike, Co. Cork and is located just outside of the Kerry Pike development boundary. Kerry Pike is designated as a 'village' in the current Cobh Municipal District Local Area Plan (LAP) 2017. The Cobh Municipal District LAP sets out a clear vision for the Village of Kerry Pike as follows:

The vision for Kerry Pike to 2023 is to secure a modest increase in the population of the settlement to retain and improve local services and facilities and to strengthen infrastructure provision and public transport connections.

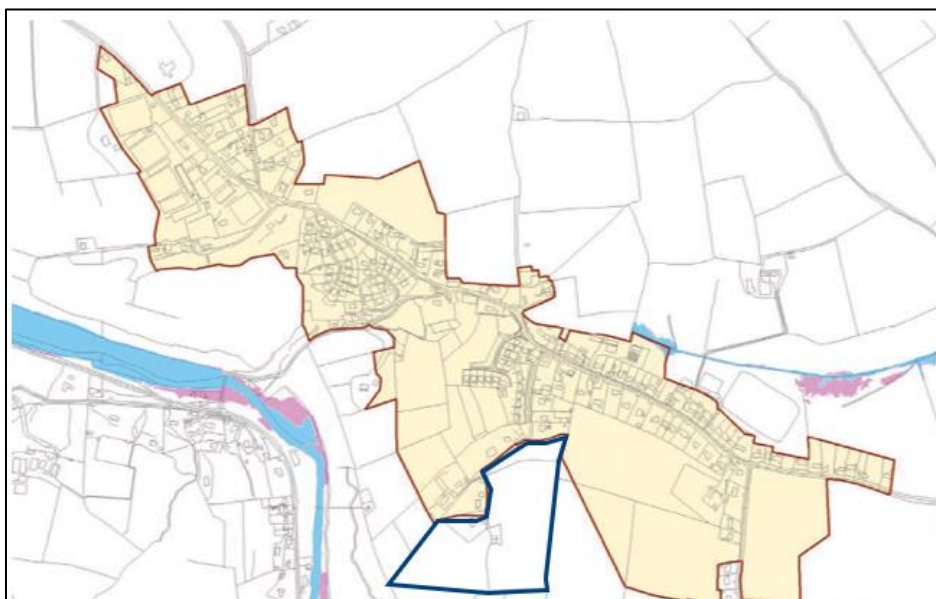


Figure 3 Subject Site in the context of existing settlement boundary for Kerry Pike

3.6 Draft Cork City Development Plan

The Draft Cork City Development plan (CDP) identifies Kerry Pike as part of the Hinterland Settlements within the Cork Strategy. Under Objective 2.56, the plan notes that the Hinterland Settlements will “allow for the sustainable growth of Killeens, Glanmire Upper and **Kerry Pike** through infill, brownfield or **edge of centre development** within defined settlement boundaries” as part of its role in the Core Strategy.

Objective 2.29 relating to Development in Hinterland Settlements notes that “Development in the city hinterland settlements shall be managed through the delivery of scaled community, housing and local employment development in the settlements of Killeens, Upper Glanmire and Kerry Pike.”

Objective 10.91 of the Draft Plan relates to Hinterland Settlements including Kerry Pike:

- a) *To limit the development of residential developments in the hinterland settlements of Kerry Pike, Killeens and Upper Glanmire to no more than 10% population growth over the lifetime of the Plan. Any further residential proposals must set out how developments will tie into the village and provide adequate pedestrian and cycling linkages to the village*
- b) *Within the village development boundaries housing development must meet the following criteria:*
 - i. *The number of houses in any particular individual scheme should have regard to the scale and character of the existing village.*
 - ii. *In the absence of a public wastewater treatment plant, only the development of individual dwelling units served by individual treatment systems will be considered subject to normal planning considerations. Any new dwellings with individual wastewater*

treatment must make provision for the connection to the public system in future and have a sustainable properly maintained private water system, unless a public supply is available. Such proposals will be assessed in line with the appropriate EPA code of practice and will have regard to any cumulative impacts on water quality.

- iii. Encourage new development to be designed to ensure that water resources and the natural environment are protected. Protection and enhancement of biodiversity resources within the receiving environment of the villages is also to be encouraged. Development will only be permitted where it is shown that it is compatible with the protection of sites, designated or proposed to be designated, for the protection of natural heritage.*
- iv. Where possible, all development should be connected to the public water supply, the public waste water treatment system and make adequate provisions for storm water storage and disposal.*
- v. Development within the core of the villages shall be designed to a high standard and reinforce the character of the existing streetscape. Where appropriate development should be in the form of small terraced development courtyard schemes.*
- vi. Residential development in other areas shall provide for small groups of houses, detached housing, serviced sites or self-build options.*
- vii. Retail and local services development should be accommodated within the core of the village and should make adequate provision for off street parking*
- viii. The development of lands closest to the village centre is proposed in the first instance, and the development of good pedestrian and amenity links with the village core/main street are considered to be an important part of any proposed scheme.*
- ix. Extend footpaths and public lighting to serve the wider village and where practical, to provide for the under- grounding of utilities.*
- x. Roadside development within the villages should be sited and designed to ensure that the development potential of backland sites is not compromised and that suitable vehicular and pedestrian access to these lands is retained.*
- xi. Encourage additional retail and community services within the village to coincide with the needs of any future growth.*
- xii. Any proposals for development within areas identified as being at risk of flooding will need to comply with the provisions of the Ministerial Guidelines – 'The Planning System and Flood Risk Management'.*

Objective 10.94 of the Draft Plan notes the following in relation to the protection of settlements:

- a) *Retain the identity of towns and settlements, to prevent sprawl, and to ensure a distinction in character between built up areas and the open countryside by maintaining the integrity of the Hinterland.*
- b) *The Hinterland areas that lie in the immediate surroundings of towns and settlements will generally be used for agriculture, open space or recreation uses. Where European sites (formally Natura 2000 sites) occur within the Hinterland, these shall be reserved for uses compatible with their nature conservation designation.*
- c) *Ensure that the approach roads to towns and villages are protected from inappropriate development which would detract from the setting and historic character of these settlements, and to prevent linear roadside frontage development on roads leading out of towns and villages.*

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.

The site within our client's ownership has been zoned as part of the City Hinterland under ZO 21 where it is an objective "to protect and improve rural amenity and provide for the development of agriculture."



Figure 4 Extract from the Draft Cork City Development Plan – Site 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.

4. Rationale

The Draft Cork City Development Plan proposes to exclude our clients' site from the development boundary. The purpose of this submission is to request that Cork City Council include our client's lands to be zoned as "ZO-02: *New Residential Neighbourhood*" to allow for medium density residential development.

The subject lands adjoin the currently under construction Clonlara development to the east with the subject lands in close proximity of Clogheen National School and Gleann na Laoi GAA Grounds. Vehicular access to our client's site can be accommodated through the Clonlara development currently under construction or from a local access road to the west.

The Clonlara development provides for footpaths and public lighting within proximity of our clients site. Similarly, it is envisaged that a direct link can be made between our client's lands and the permitted development under Ref. No. 18/7417 as demonstrated in Figure 6 below.



Figure 5 Development permitted under 18/7417. Clients site immediately west of red line boundary



Figure 6 Potential connection between permitted development and site at Coolumurragh, Kerry Pike.

Our client's lands are currently zoned as City Hinterland under the Draft Plan. However, it is considered that the zoning of the northern part of the subject lands as "Tier 2 – ZO-02: New Residential Neighbourhood" would ensure the ambitious growth targets set out in the NPF.

Similarly, in accordance with CMATS, a 'Bus Connects' corridor is proposed to provide priority for public bus services, including dedicated bus lanes. As can be seen from Figure 7 below, a dedicated bus connects corridor is proposed along the Kerry Pike Road.

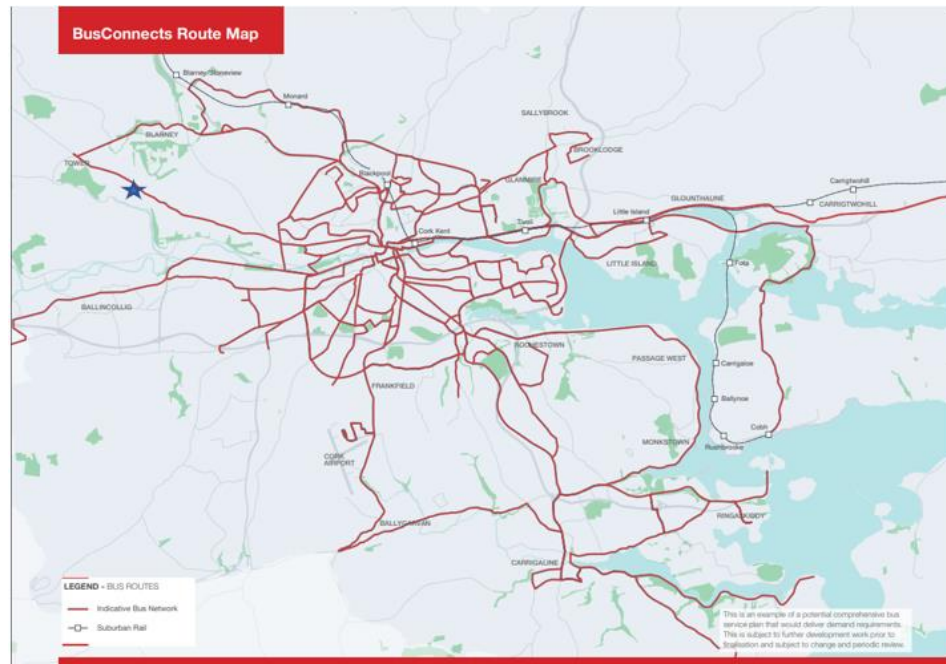


Figure 7 Extract from CMATS showing BusConnects Route – Site indicated in blue star

Accordingly, we request that the Council extend the boundary of Kerry Pike and zone our client's lands as "ZO-02 New Residential Neighborhood" as shown in yellow below in Figure 8.



Figure 8 Additional land to be included in Tier 2 zoning hatched Yellow

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 zoning our clients site in the forthcoming Development Plan. The main points of this submission are summarised as follows:

- Our client's lands are currently zoned as the City Hinterland under the Draft Plan. However, it is considered that the northern portion of our clients lands are entirely suitable for development and should be afforded as *Tier 2 ZO-02: "New Residential Neighbourhood"* in the upcoming Cork City Development Plan

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.

Please do not hesitate to contact us if you have any queries.

Yours sincerely

Andrea McAuliffe

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