

Submission to Draft Cork City Development Plan 2022-2028

For Development at Lehenaghmore, Togher, Cork
on behalf of OBR Developments Ltd.

October 2021



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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of OBR Developments Ltd., in response to public notices inviting submissions from third parties and interested parties on the Cork City Development Plan review in accordance with section 11(2)(bc) 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.

Our client is progressing an application on the residential zoned lands to the northwest and the infrastructure, access (including a Part 8 road/footpath scheme by Cork City Council) and services being provided as part of that development have all been appropriately designed and sized to service the lands subject of this submission.

That makes the lands subject of this submission fully serviced and 'ready to go'. As demonstrated by the demand for the houses currently under construction, there is a huge demand for residential development in this location in Leghenaghmore and we would ask the City Council to include these lands for residential development as an amendment to the draft Plan.

Accordingly, this submission requests the following provisions in the forthcoming CDP for Leghenaghmore:

- Extend the ZO 01 Sustainable Residential Neighbourhood or the ZO 02 New Residential Neighbourhoods zoning to include our clients' lands.**

This submission is structured as follows:

- Site Context
- Planning Policy
- Rationale for Submission Request:
 - Suitability of Site for Residential Development
 - Supporting Infrastructure
 - Retention of a Compact Settlement
- Conclusion

2. Site Context

The subject site is located in the townland of Lehanaghmore to the south west of Cork City Centre. The proposed site is located to the south of the N40 and Cork Airport and a 15 minute walk from Togher and Wilton. Lehanaghmore is a mature residential area which is accessed from the Togher Road. The area comprises a mix of house types including detached and semi-detached, single storey, dormer and two storey houses. The subject site is bound to the west by the Pouladuff Road with agricultural lands beyond, to the south by Leghenaghmore Park, to the north by The Gates residential estate and to the east by agricultural land.

Leghenaghmore is located within the South Environs of Cork City, and it has experienced a rapid population growth in recent years due to its close proximity to the City Centre and the surrounding employment base located in Ringaskiddy and Mahon.

The lands subject of this submission currently comprises a number of different field parcels, laid to pasture. The northern portion of the lands are located within the development boundary of the Cork City South Environs with the remainder sitting within the Metropolitan Greenbelt. The site is located to the south of the N40 South Ring Road and to the west of the N27 Kinsale Road/Airport Hill and is strategically located at a midway point between Cork International Airport and the N40 approximately 1km to both.

The site is currently vacant and offers a very significant opportunity to provide a residential development in close proximity to the N40 South Ring Road and Cork International Airport.

The northern portion of the lands are zoned for open space use (SE-O-04-). A Part 8 for local road and public transport improvements in the area surrounding the site is at an advanced stage by Cork County Council and is to be delivered in the short term. Playing fields and amenities are provided to the south of the lands at the recently developed Leghenaghmore amenity area.



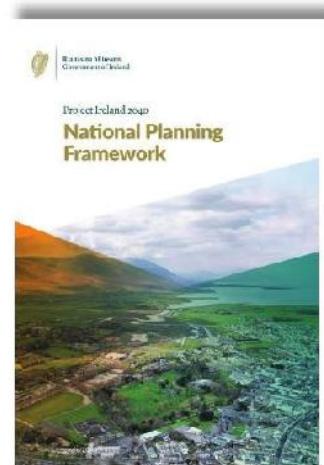
Fig 1: Subject lands at Leghenaghmore outlined in red.

3. Planning Policy Context

3.1 National Planning Framework

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. 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:

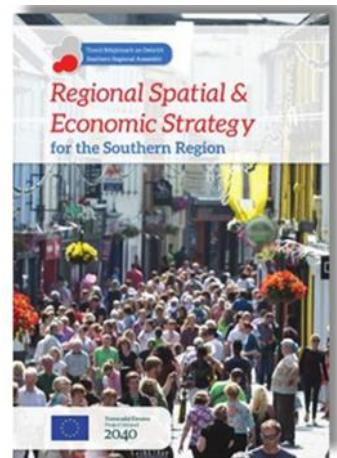
- Targeting a greater portion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas**; and
- Future homes are required to be located where people have the best opportunities to access a high standard quality of life.

To address rural decline, a significant proportion of national population and economic growth will be targeted at building up the fabric of our network of smaller towns, villages and rural areas with much of that happening by redeveloping derelict and under-utilised lands inside small towns and villages.

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.

RSES identifies towns as the local drivers for their surrounding areas. It is an objective of the RSES to ensure that development plans tailor the appropriate planning response to the scale, nature and location of the settlement.



3.3 Cork County Development Plan 2014

Leghenaghore lies within the South Environs of Cork City. Objective 3-1 of the Cork County Development Plan (CDP) 2014 states that the strategic aim of the City Environs (North and South) is to:

“... grow its population to 20,000 as envisaged by the NSS. Develop as a major integrated employment centre so that it fulfils its role at regional and county level and should be a location of choice for most people especially those with an urban employment focus.”

Leghenaghmore sits within the County Metropolitan Strategic Planning Area, which is noted as the main engine of population and employment growth for the region (Para 2.2.22). In this regard, Objective CS 4-1 prioritises certain locations, including the South Environs, to accommodate the planned population growth in the Cork Gateway region:

“g) 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.”

In line with this aspiration, the CDP goes on to state that up to 2022, there is a targeted growth of 31,308 persons. This represents a decrease of 1,327 from 32,635 persons in 2011. It should be noted that the population increased by 2,533 persons in the last intercensal period between 2006 and 2011. However, taking into account the household formation trends towards smaller household sizes, the CDP put forward a housing unit requirement of 1,284 units up to 2022.

"a) Secure the development of a mix of house types and sizes throughout the County as a whole to meet the needs of the likely future population in accordance with the guidance set out in the Joint Housing Strategy and the Guidelines on Sustainable Residential Development in Urban Areas."

3.4 Ballincollig Carrigaline Municipal District Local Area Plan

In the 2017 Ballincollig – Carrigaline Municipal District Local Area Plan (LAP) Lehenaghmore forms part of the southern suburbs of Cork City. The current Local Area Plan (LAP) states that the strategic aim of the South Environs is the:

"...consolidation of the southern suburbs within the existing development boundary. The promotion of the suburban centres as important locations for residential, community and recreational facilities. Ensure the clear demarcation of the inner metropolitan greenbelt."

Policy SE-GO-01 establishes objectives for the quantum of development to be accommodated in the South Environs area over the plan period. It is an objective of the plan:

"To secure the development of 1,285 new dwellings in the South-Environs between 2017 and 2023."

The site is zoned 'Open Space' in the Ballincollig-Carrigaline Municipal District Local Area Plan 2017 and is within the development boundary of the Cork City South Environs. Objective SE-O-04 of the Local Area Plan sets out the following objective for the site:

"Open space for public recreation including provision of playing pitches."

The southern portion of the site sits outside the development boundary within the Metropolitan Greenbelt.

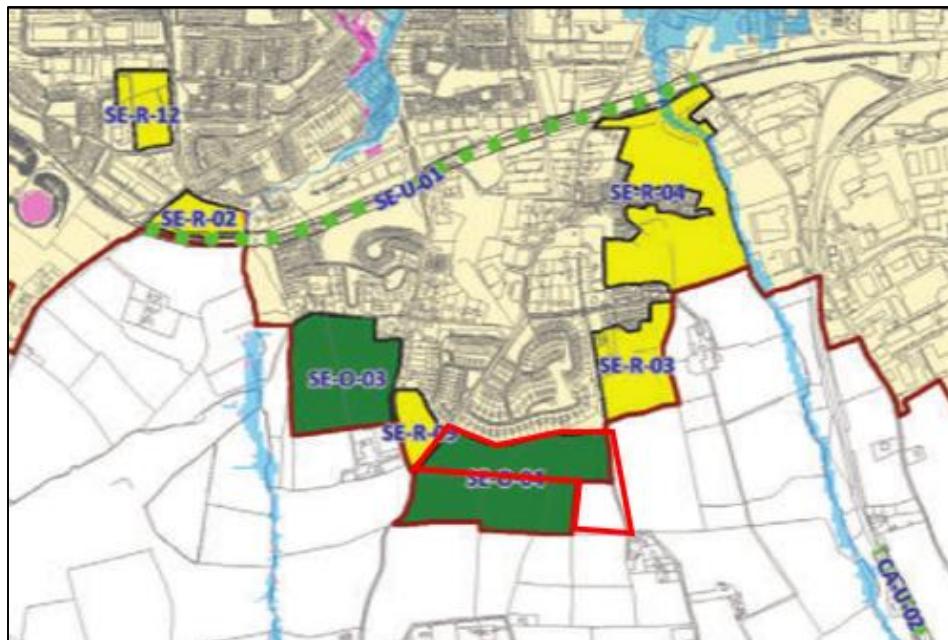


Fig 2: Extract from Ballincollig – Carrigaline Local Area Plan.

3.5 Draft Cork City Development 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."

In the Draft CDP Leghanaghmore is situated within the City Suburbs. The Role in the Core Strategy of the City Suburbs is as follows:

"Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS."

The northern portion of our clients' lands are zoned ZO 16 Public Open Space where the following objective applies:

"To protect, retain and provide for passive and active recreational uses, open space, green network, natural areas and amenity facilities."

The southern portion of our clients lands are zoned Z021 City Hinterland where the following objective applies:

"To protect and improve rural amenity and provide for the development of agriculture."



Fig 3: Subject lands outlined in red.

3.6 Cork Metropolitan Area Transport Strategy 2040

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 3, dedicated bus connects corridors are proposed for the Lehenaghmore/Togher area and along the proposed Southern Distributor Road (SDR) which runs to the south of the site.

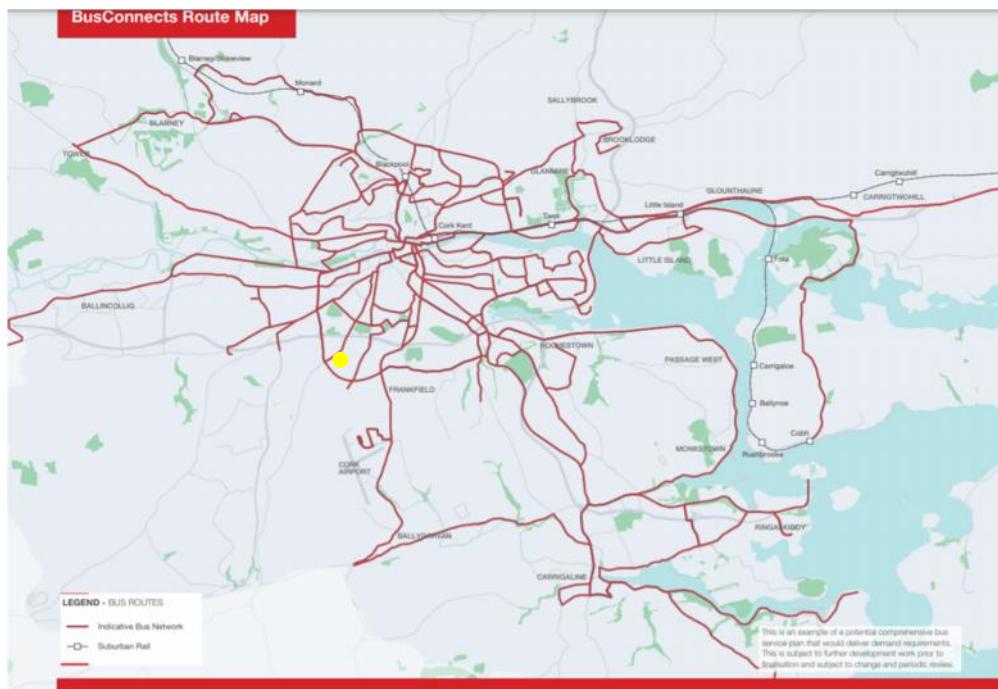


Figure 3: Extract of CMATS Bus Routes – site indicated as yellow dot

In addition to Busconnects, the proposed Southern Distributor Road (SDR) is identified as a priority project in CAMTS and will deliver a new strategic piece of infrastructure for the South Environs – see Figure 4 below.

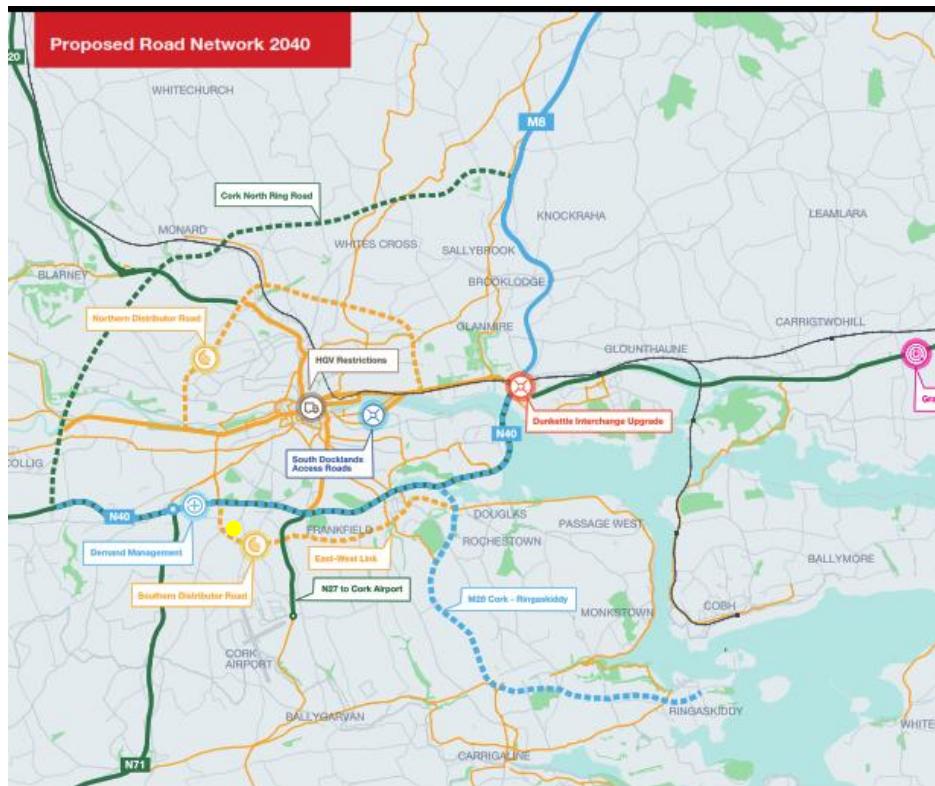


Figure 4: Extract from CMATS – proposed road network, including the SDR – site indicated as yellow dot

4. Rationale for Submission Request

The purpose of this submission is to request that Cork City Council zone our client's lands for residential use. This section of the submission discusses and provides a rationale for this request. Our client has a strategic land holding in Leghenaghmore that is fully serviceable and available for development. The site has access to all relevant infrastructure including a foul and surface water network which has been sized to cater for additional units on this land. The lands also have access to vehicular and pedestrian infrastructure which can cater for additional units. If the South Environs and Togher is to deliver on its strategic function as a City Suburb, driving growth at a sub-regional level, the strategic planning policy context must support viable housing development during the lifetime of the forthcoming Development Plan, on lands such as our clients' land holding.

4.1 Suitability of Site for Residential Development

The subject site is currently zoned 'SE-O-04' within the current Ballincollig Carrigaline Municipal District LAP. As part of the Draft Cork City Development Plan, it is proposed to zone the site as ZO 16 Public Open Space where it is an objective *"to protect, retain and provide for passive and active recreational uses, open space, green network, natural areas and amenity facilities"* and ZO 21 City Hinterland where it is an objective *"to protect and improve rural amenity and provide for the development of agriculture."*

In terms of settlement typology, Leghenaghmore is within the City Suburbs, where it is a vision for Cork 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. It is therefore necessary to reserve land readily available for development to facilitate these objectives.

Leghenaghmore is located adjacent to the N40 which is to the north of our client's landholding and Cork Airport which is to the south. The area has numerous bus services to Cork City, and beyond with frequent services throughout the day, Monday to Friday. The area also benefits from a range of local services including schools, church, post office, childcare facility, convenience shops, community centre and public houses. The lands have pedestrian and cyclist links to the wider area via existing footpaths within The Gates to the north of the site. These links will also enhance the amenity infrastructure for residents and promote more sustainable modes of transport within the area.

The site, the subject of this submission, is strategically located to the south of the existing residential developments. It is within walking distance of key services and less than 700m from a public transport corridor. The site also has access to key infrastructure services as detailed at Section 4.2 of this submission, including the proposed Southern Distributor Road which will deliver a new strategic piece of infrastructure for the South Environs.

It is imperative that the forthcoming development plan is cognisant of the important role Leghenaghmore will play within the settlement hierarchy in Cork City. It will be critical that the new core strategy sets robust policy guidance to ensure sufficient land is zoned to meet the projected increase in market demand and to ensure viability of the south environs. 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.

As can be seen from the image below our client's lands have the capacity to accommodate a range of house types which will form a continuation of the 'The Gates' development. These units can be provided in the short to medium term. The site has access to all relevant infrastructure including vehicular and pedestrian access and waste water and surface water drainage. The development of this site will ensure the most effective use of land, infrastructure and resources, while balancing the need to retain the character, landscape, urban form and environment qualities of Cork City.



Fig 4: Potential development at Leghenaghmore, Togher.

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 Leghanaghmore have access to existing foul and storm water drainage and can cater for immediate residential development. Both the foul sewer and the surface water system within the neighbouring development to the northwest have the capacity to cater for potential additional housing on the subject lands.

Roads Infrastructure

In relation to the strategic road's infrastructure Leghenaghmore has benefited from the N40, which has improved the environmental quality of the area and increased accessibility to Cork City and other areas. The site is situated less than 1.5km from the nearest junction which provides direct access to the N40.

The site also has good road access onto the Pouladuff Road which provides a direct link to the surrounding areas. The Council has recently undertaken a Part 8 road and footpath improvement scheme for the area and the Southern Distributor Road will deliver a new strategic piece of sustainable transport infrastructure for the area.

As can be seen from Fig 4 above, the lands have excellent links to the wider area. These connections, including direct footpath connections and pedestrian crossings to main services, have already been provided. Bus stops are also already in place within close proximity to the lands which facilitate the provision of regular bus services to Cork City centre and beyond.

Supporting Infrastructure and Facilities

Leghenaghmore also has good access to a wide range of facilities. Facilities within the area include shops, schools, a church, convenience shops, pubs and restaurant's, banks, credit unions and a post office. The area is also served by a frequent bus services to Cork City and beyond. The inclusion of the lands subject of this submission, which are in close proximity and within walking distance of important facilities will help to optimise the use of the infrastructure serving the town.

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 N40.

Sequential Test

The lands lie adjacent to the existing developments of The Gates making it a natural progression for the development of the area. It 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.

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 Leghenaghmore with a stronger approach to development. The main points of this submission are summarised as follows:

- **The Council extends the ZO 01 Sustainable Residential Neighbourhood or the ZO 02 New Residential Neighbourhoods zoning to include our clients' lands.**



Fig 5: Proposed area for zoning outlined in red.

As noted previously, the vision for Cork is to grow the city as a sustainable compact city. Leghenaghmore is located to the southern periphery of Cork City with the City Hinterland to the south, with minimal areas of developable land existing within the settlement itself. The proposed site is one of the largest tracts of land within the settlement boundary which has the potential to accommodate residential development. Rezoning of the land would promote the protection of the surrounding greenbelt/hinterland and be consistent with the vision of the draft plan which promotes compact development. This would support the role of the urban town which seeks to promote development that focuses on:

“... prioritising walking, cycling and public transport use...”

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,



Cora Savage
McCutcheon Halley