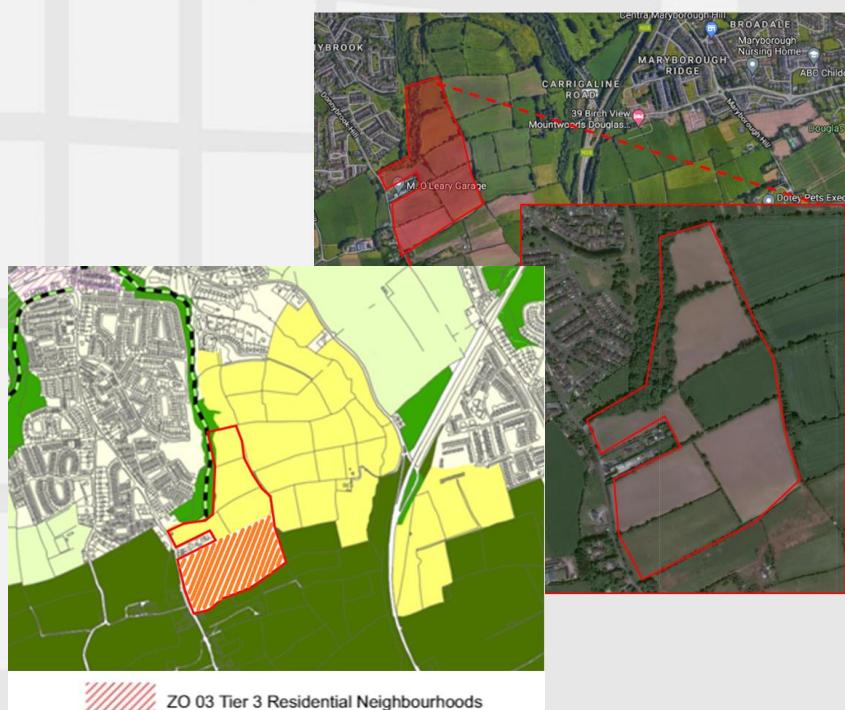


Submission to Draft Cork City Development Plan 2022-2028

Amendment to Zoning of South City Environs at Castletreasure

October 2021



Document Control Sheet

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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Tadhg Cashman in response to public notices inviting submissions from third parties and interested parties on the Cork County 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 including the delivery of homes in the lifeline 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 Castletreasure, Douglas. Our client welcomes the proposed zoning of the northern end of their lands as "*ZO-02 New Residential Neighbourhood*".
- The draft plan includes a Tier 3 zoning, 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. The southern end of our client's lands are currently zoned as the Metropolitan Greenbelt under the Draft Plan. However, it is considered that these lands are perfectly suited to be zoned as "*Tier 3 - ZO-03: Residential Neighbourhood*".
- We request that the remainder of our client's lands be zoned as "*Tier 3 - ZO-03: Residential Neighbourhood*".

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. 19ha in total lie within the South Environs of Cork City and occupies an important strategic position within Metropolitan Cork, forming part of the city's suburbs. The site is located approx. 1.5km south of Douglas Village and approx. 5km south-east of Cork City Centre. The area has experienced significant growth in recent years due to its proximate location to the city centre as well as Ringaskiddy located approximately 7km south-west along the N28. The subject site is located on sloping, undulating land within the townland of Castletreasure and bounds long established residential areas to the northwest, the recently permitted Cairn Homes SHD to the north, the N28 Cork Ringaskiddy Road, and MARYBOROUGH Ridge SHD to the east and undeveloped agricultural land to the south and east.

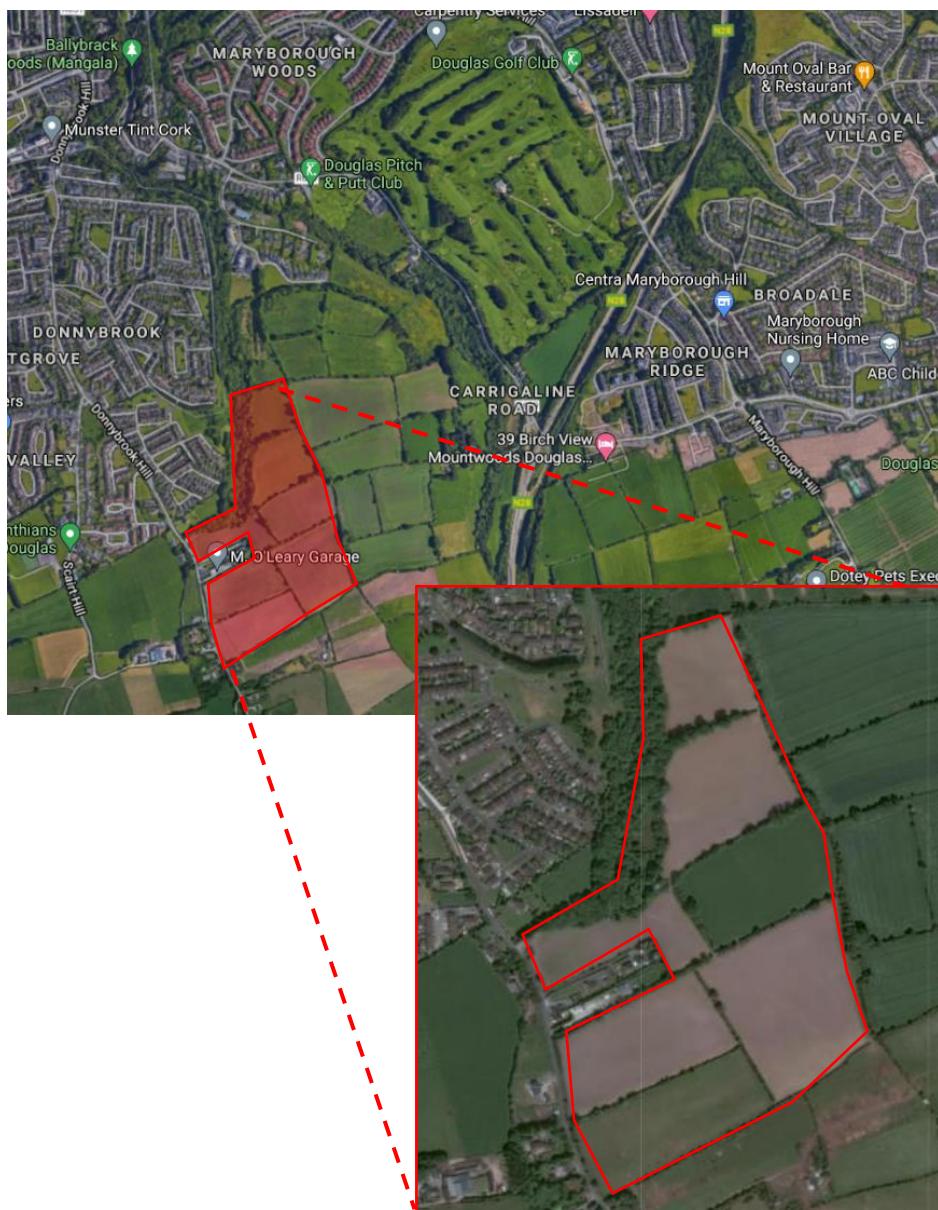


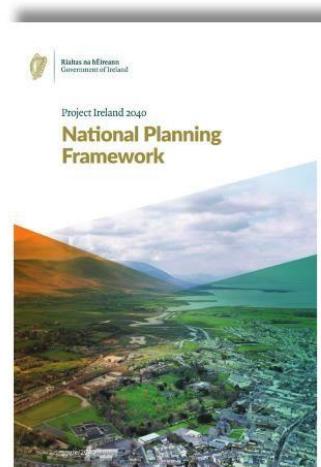
Figure 1. Site Location Aerial Image – lands highlighted in red

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.

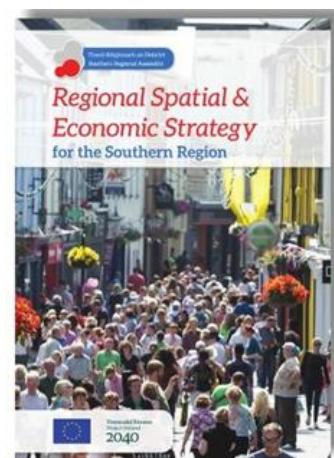
A core objective of the National Planning Framework is to build an average of 25,000-30,000 new homes annually to meet future planned needs of the population and deal with the demand-supply imbalance over recent years, in effect a doubling of annual housing output from 2016/2017 levels. According to 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 Cork County Development Plan 2014

Up until the City Boundary extension in 2019, the majority of the subject lands were part of Cork County and under the existing Cork County Development Plan 2014, the subject lands were zoned as Metropolitan Greenbelt as shown on the following page in figure 2.

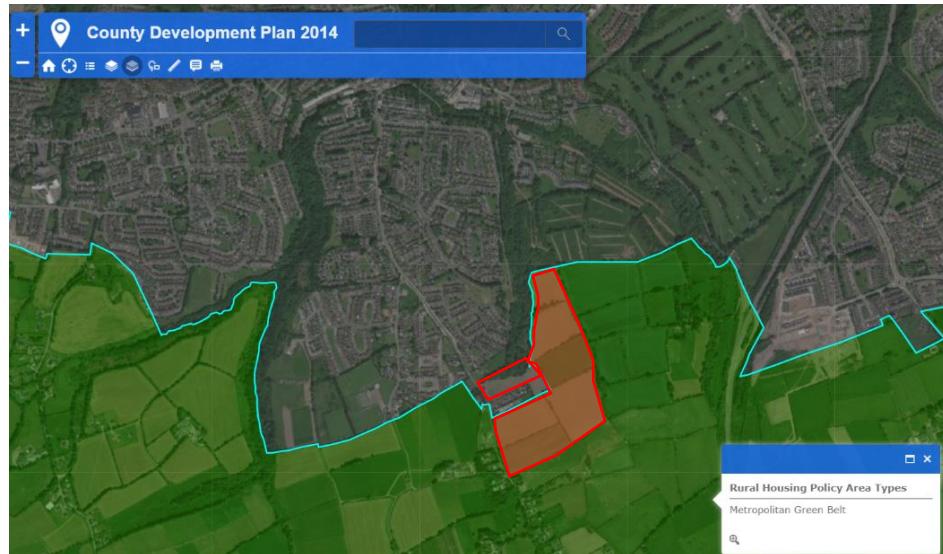


Figure 2: Subject lands outlined in red – majority of lands were in Cork County

3.4 Cork City Draft Plan 2022-2028

Our client welcomes the zoning of the northern portion of their lands as "ZO-02 New Residential Neighbourhood" as shown in yellow below in figure 3. to which the following objective applies:

ZO-02: Zoning Objective 2: "To provide for new residential development in tandem with the provision of the necessary social and physical infrastructure."

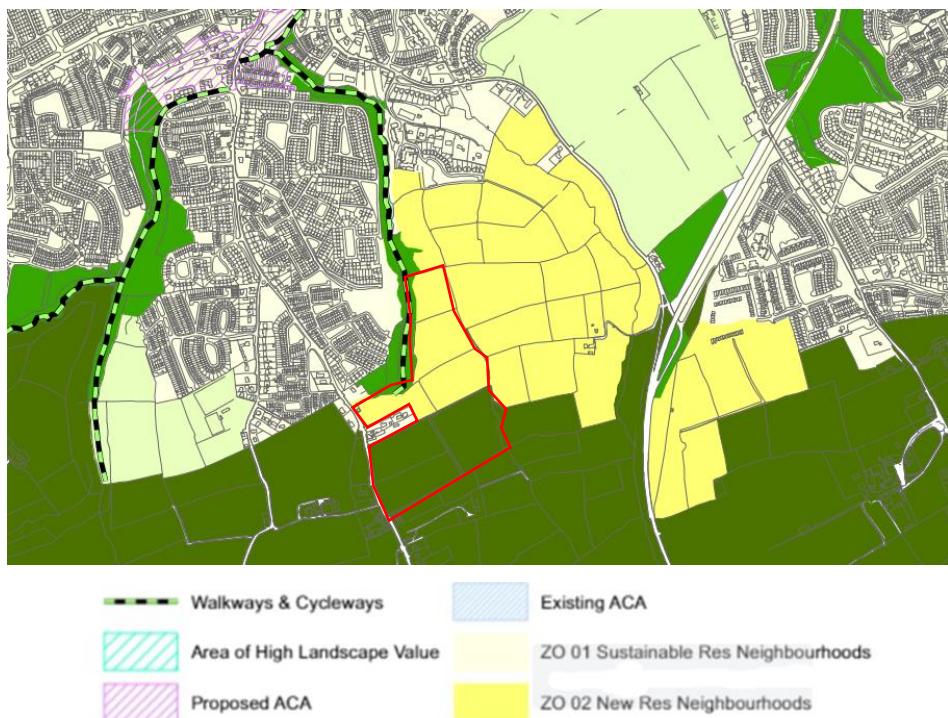


Figure 3: Extract of Zoning Map under Draft Plan

This Plan 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. This zoning covers primarily greenfield, undeveloped lands for new sustainable residential areas, mainly deliverable in the longer term. The draft plan states that 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.

4. Rationale for Submission Request

Our client's lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs at Castletreasure, Douglas. Our client welcomes the zoning of the northern portion of their lands as "ZO-02 New Residential Neighbourhood".

The northern end of the subject lands adjoins the SHD recently permitted to Cairn Homes by An Bord Pleanala for a total of 472 no. residential units including 234 no. houses in a mix of semi-detached and terraced and 238 no. apartments/duplexes. As shown in figure 4 below pedestrian / vehicular connections can easily be made from the permitted development into the northern end of our client's lands.



Figure 4: Connectivity into permitted Cairns SHD

In addition, there is scope for multiple access points into the overall subject lands from both surrounding public roads, the proposed extension of the public road at the north-western corner as well as adjoining lands and permitted developments as indicated by the purple and green arrows in figure 5 to the right.

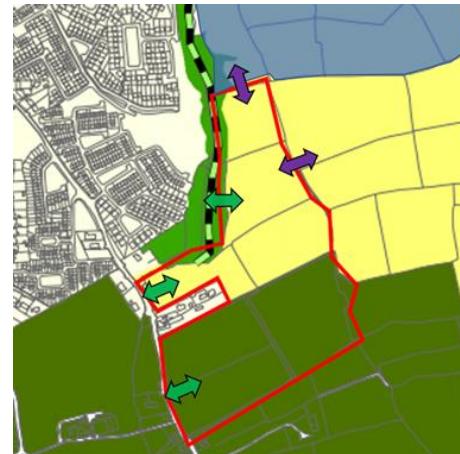


Figure 5: Access / Connectivity to and from subject lands

There is access to commercial, social and community services within walking distance of the lands, such as Ballybrack Woods, Douglas RFC Grounds and Corinthians Soccer Park and St. Columba's National School as shown below in figure 6

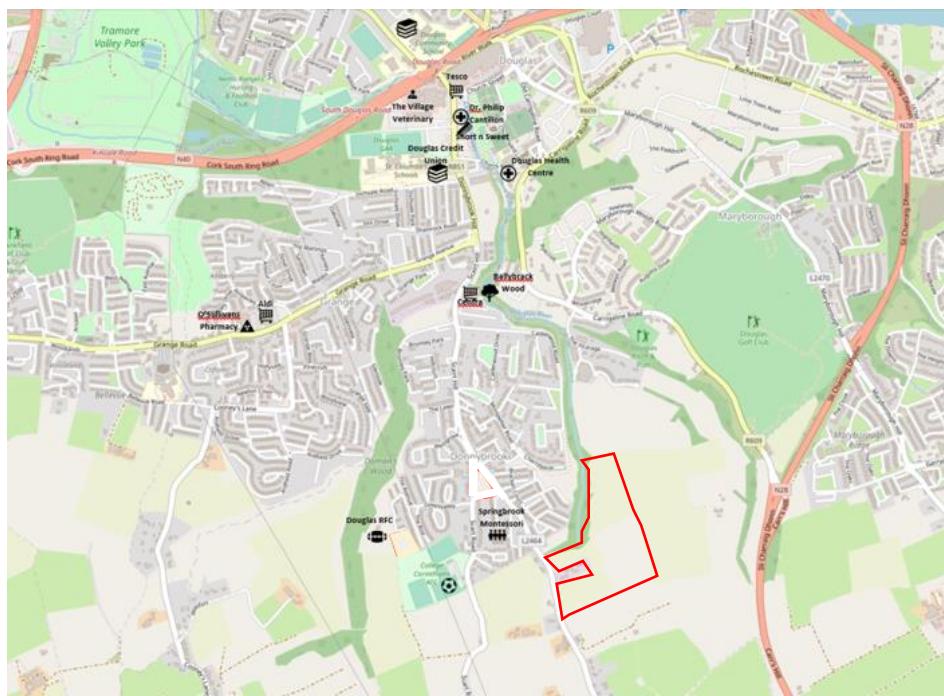


Figure 6: Location of services/facilities in context of site. Site outlined in red.

In terms of public transport, the 207 Bus Eireann route serves the subject lands terminating at Scairt Hill approx 400m northwest of the subject lands. There are existing footpaths and public lighting along this route.

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 7 on the following page, a dedicated bus connects corridor is proposed along Donnybrook terminating at Scairt Hill.

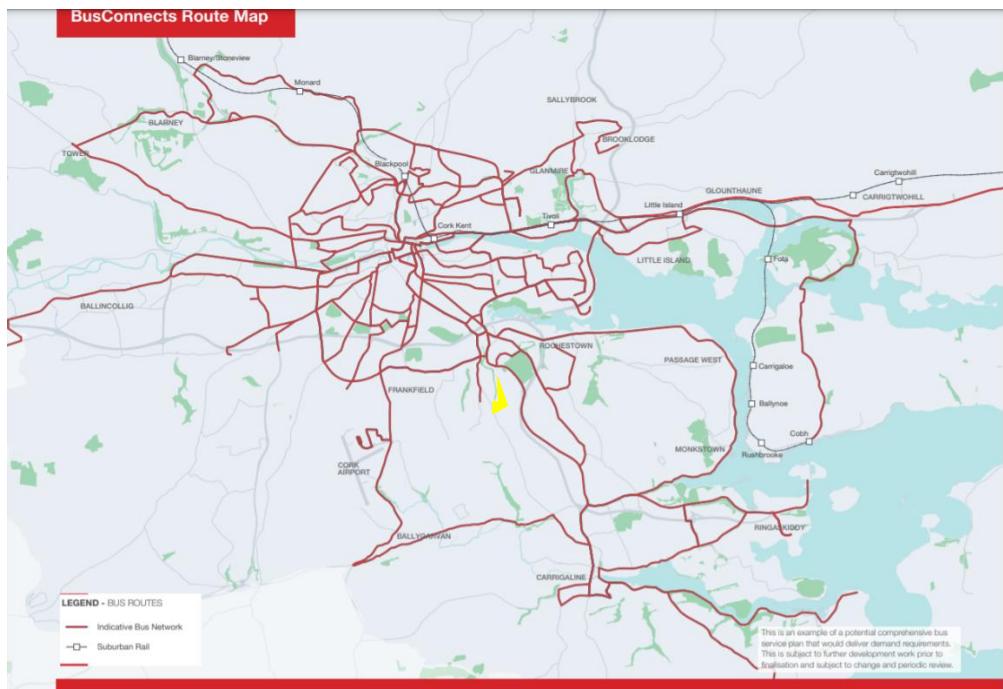


Figure 7: Extract of CMATS Bus Routes

As shown the subject lands are located in an important strategic position within Metropolitan Cork, forming part of the city's suburbs and benefit from an array of existing services. Again, our client welcomes the zoning of the northern portion of their lands as "ZO-02 New Residential Neighbourhood".

It is considered that the southern end of our client's lands should be zoned as a Tier 3,

The southern end of our client's lands are currently zoned as the Metropolitan Greenbelt under the Draft Plan. However, it is considered that the zoning of these strategic lands as "Tier 3 - ZO-03: Residential Neighbourhood" would ensure the long-term planning of infrastructure, given the ambition growth target set out in the NPF.

Accordingly, we request that the Council zone the remainder of our client's lands as "*Tier 3 - ZO-03: Residential Neighbourhood*" as shown on the following page in red in figure 8 on the following page.



Figure 8: Additional area (hatched in orange) to be included at Tier 3 Zoning

5. Conclusion

- Our client's lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs at Castletreasure, Douglas. Our client welcomes the proposed zoning of the northern end of their lands as "ZO-02 New Residential Neighbourhood".
- The draft plan includes a Tier 3 zoning, 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. The southern end of our client's lands are currently zoned as the Metropolitan Greenbelt under the Draft Plan. However, it is considered that these lands are perfectly suited to be zoned as "Tier 3 - ZO-03: Residential Neighbourhood".
- We request that the remainder of our client's lands be zoned as "Tier 3 - ZO-03: 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.