

Submission to Draft Cork City Development Plan 2022-2028

Amendment to Zoning at Ardarostig, Bishopstown, Cork
on behalf of O'Keeffe, Creedon and Babbinswood Ltd

October 2021



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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Tony O'Keeffe, Grace O'Keeffe, Regina Daly Creedon, Dominic Creedon and Babbinswood Ltd 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 lifeline of the plan and beyond.

This submission relates to lands at Ardarostig, Bishopstown, Cork. The boundary of our client's site is outlined in red in Figure 1 of this submission.

This submission requests the following provisions in the forthcoming CDP for Ardarostig:

- Extend the ZO 02 New Residential Neighbourhoods zoning to include our clients' lands. Our clients' lands are currently zoned as the City Hinterland under the Draft Plan however the subject site occupies an important strategic position with Metropolitan Cork which is in close proximity to commercial, business and employment areas. The subject lands are within close proximity to Cork Airport, the N71, N22, public transport, neighbourhood shopping centre and existing residential area.
- It is considered that the lands are entirely suitable for development as the site is identified as a Strategic Land Reserve (SLR 6) in the current Ballincollig Carrigaline Local Area Plan 2017.
- The rezoning of our client's site would deliver a socially inclusive and economically vibrant urban present within an existing neighbourhood and working environment. It would also provide physical, social and amenity infrastructure with new housing and promote permeability through the site to integrate the location more successfully with the adjoining community to site directly adjoining our clients lands to the north and north west.

This submission is structured as follows:

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

2. Site Context

Our client's lands which measure approximately 12ha in total lie within Ardrostig, Bishopstown which is located southwest of Cork City and occupies an important strategic position within Metropolitan Cork. The subject lands are surrounded by a built-up area with a mixed use of residential, commercial uses such as Bishopstown Court Neighbourhood Centre and business employment uses. Directly to the west of site is the Bandon Road (N71), to the north of the site lies the Bandon Road Roundabout which provides direct access to the N22, N40 and the South Ring Road. The lands to the north are established residential and commercial uses and to the south are agricultural lands. Immediately to the north west of the site lies a recently permitted Strategic Housing Development (SHD) for a development consisting of 276 no. residential units and a creche facility granted by An Bord Pleanála dated 06th September 2021 (ABP Ref: 310274).

Development along the N71 generally comprises a mix of commercial and low-density residential development, with only pockets or infill sites left to be developed.

The site comprises of a single dwelling and offers a very significant opportunity to provide a residential development in close proximity to the N40 South Ring Road and Cork International Airport.



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

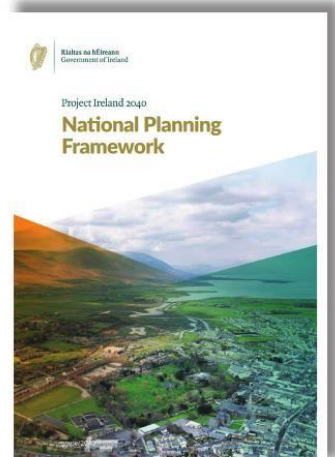
3. Planning Policy

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 centers 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 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.

Compact Growth Objectives within the NPF outline the following:

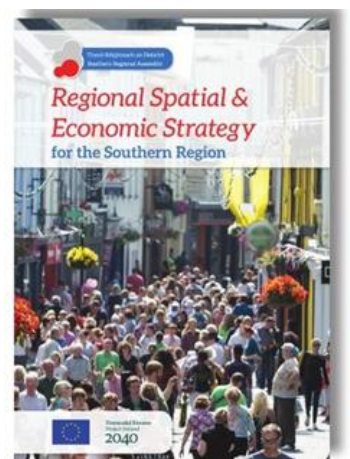
- Targeting a greater portion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas**; and
- Future homes are required to be located where people have the best opportunities to access a high standard quality of life.

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

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.

The sustainable growth of Metropolitan Cork requires consolidation, regeneration, infrastructure led growth and investment in each of the following locations: city centre (including the Docklands and Tivoli), potential light rail transit (LRT) corridor, strategic bus network corridor and suburban area nodal points and corridors along the



Ballincollig to Mahon LRT line, district centres, north and **south environs**, Glanmire, city and suburban area expansion (sustainable and infrastructure led).

3.3 Ballincollig Carrigaline Local Area Plan 2017

Our clients' lands formed part of the Cork County Development boundary until the Cork City Boundary extended in 2019. The 2014 CDP identified a significant lack of headroom available for residential development in the County Metropolitan Cork Strategic Planning Area. In anticipation of the projected growth within Metropolitan Cork, the County Council undertook a review of lands in the Metropolitan Area which identified 12 potential sites which could accommodate the additional headroom required to ensure a stable supply of residential lands. The existing Ballincollig Carrigaline Municipal District Local Area Plan 2017 identifies the northeast corner of the landholding within the settlement boundary which is zoned as 'Existing Built Up Area' and the majority of the holding forms part of Strategic Land Reserve 6 – 'Chetwynd and Ardarostig', which is described in the LAP as follows:

"These sites comprise approximately 100 ha of land either side of the N71 at the Bandon Road Roundabout. The lands are quite elevated in sections and are visible across a wide area of the City. The lands are within the metropolitan green belt around Ardarostig to west and have remained largely intact. The majority of the lands are currently in agricultural use. A number of submissions have been received for zoning of the land into residential development."



Figure 2 Extract of the LAP zoning with subject lands outlined in blue.

3.4 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, Ardarostig is situated within the City Suburbs and 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, cyclin and public transport access. deliver uses, layouts and densities that enhance existig 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."

As shown in Figure 3 below, the Draft Plan has indicated a proposed zoning of City Hinterland (ZO 21) for the subject lands where it is an objective to "protect and improve rural amenity and provide for the development of agriculture."



Figure 3 Extract of Zoning Map in Draft Plan (subject lands dashed 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 maintains 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. ZO 02 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.

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 2021, the subject lands are included within the South-West 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 42,543 by 2028 for the area, an increase of 2,306 or 6%, and a housing target of 926 units. It is stated that the South-West 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 availability of development land entails that the South-West Suburbs will be important for delivering continued demand for private rented accommodation in the area as well as for purpose built student accommodation. Delivery of housing for the City across all streams is important to ensure appropriate housing quality and tenure mix.

4. Rationale for Submission Request

Our client's lands are currently zoned as the City Hinterland under the Draft Plan as shown in figure 2 above. The purpose of this submission is to request that Cork City Council zone our client's entire landholding for residential use (ZO 02 New Residential Zoning). This section of the submission discusses and provides a rationale for this request.

The lands surrounding area are included within the 'South West Suburbs'. The subject site is in close proximity to a recently permitted Strategic Housing Development comprising of 276 no. units which is located to the north west of our clients site. The lands are in close proximity to the existing Bishopstown Neighbourhood Shopping Centre. Vehicular access to the site can be accommodated from the existing road directly adjoining the western boundary of the site and connectivity and permeability of the area can be improved through an integrated design of the permitted SHD application located to the north west of the site and the rezoned ZO 02 New Residential

Neighbourhood lands located directly to the north of the site as shown in figure 2 below in this submission.

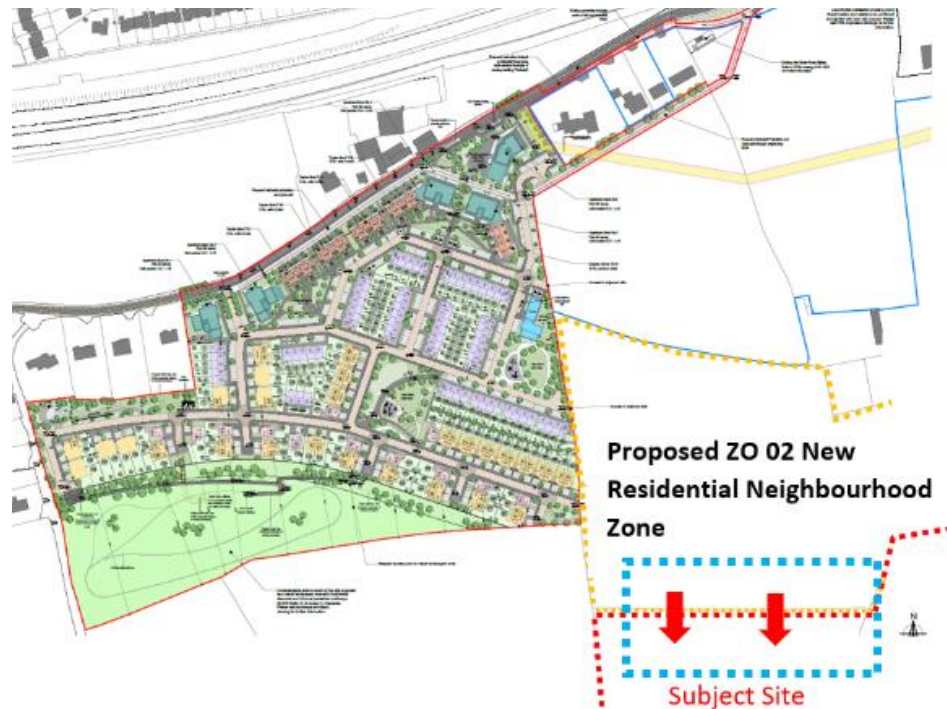


Figure 4 Extract from site layout for the Ardarostig SHD and New Residential Neighbourhood Zoning to the North of our clients' lands

The strategic importance of Bishopstown in Cork City is undisputed and there is there is significant potential for capitalisation on the extant sustainable transport infrastructure, in line with national and regional policy through the activations of residential zoned development lands. The NPF outlines the crucial importance of progressing higher density housing development on greenfield sites close to public transport corridors, particularly with regard to creating sustainable communities. Our clients' lands would promote permeability through the site and would integrate the location more successfully with the adjoining sites and community which would facilitate improved sustainable travel in a west to east and north to south direction.

4.1 Suitability of Site for Residential Development

Our client's lands are currently zoned as City Hinterland under the Draft Plan Hinterland where it is an objective "*to protect and improve rural amenity and provide for the development of agriculture.*". However, it is considered that the zoning 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 extend the boundary and zone our client's lands as "ZO-02 New Residential Neighborhood".

It is considered that the lands are entirely suitable for ZO 02 New Residential Neighbourhood Zoning due to the following :

- The subject site is currently zoned as a Strategic Land Reserve (SLR 6) in the current Ballincollig Carrigaline Local Area Plan 2017.
- Our subject lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs Bishopstown, Cork;
- The subject lands are within close proximity to the surrounding road network and are immediately south west of two primary routes, the N40 and N71, existing residential and employment areas. The western portion of the subject lands adjoin the N71 providing excellent connectivity to the national road network as well as Cork Airport and surrounding 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, Marymount Hospital, Cork University Hospital, Cork Science and Innovation Park and Wilton Shopping Centre, Cork Institute of Technology and University College Cork. All of which provide are major employers of the City.

In terms of settlement typology, our clients site lies south of 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.

As outlined above, the site, the subject of this submission, is strategically located to the south of the proposed ZO 02 New Residential Neighbourhood zoned lands and existing residential developments. Our client site is within walking distance of key services and would play a pivotal role in providing initial access to the lands located to the north and north west as shown in Figure 4.

It is imperative that the forthcoming development plan is cognisant of the important role Ardaraostig 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.

It is considered that the zoning of the subject lands as "Tier 3 – ZO-03: Tier 3 Residential Neighbourhood" would ensure the ambitious growth targets set out in the NPF and would be well placed to provide housing in tandem with the job creation envisioned for the area such as the Science Park. Accordingly, we request that the Council zone this area as "ZO-03 Tier 3 Residential Neighborhood".

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:

- Need
- Policy Context
- Capacity of Water
- Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- 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 Ardarostig have access to existing foul and storm water drainage and can cater for immediate residential development.

Roads Infrastructure

In relation to the strategic road's infrastructure Ardarostig has benefited from the N40 and N71, which has improved increased accessibility to Cork City and other areas such as Cork Airport and employment areas. The site is situated to the west of the N71. CMATS has also made a provision for a Park and Ride facility at the Bandon Road Roundabout which will improve access to the City with high frequency services using the Bus Connects network which will provide sustainable options for the population within the South West Suburbs.

Supporting Infrastructure and Facilities

Ardarostig has good access to a wide range of facilities. Facilities within the area include a neighbourhood shopping centre, a service station and convenience store, schools and universities, hospitals and commercial showrooms. 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 N71. The site will promote permeability through the site which would integrate the location more successfully with the adjoining sites. It is therefore considered that our clients lands are pivotal

in providing initial access to the recently zoned land immediately north of the site to ensure successful access onto the N71.

Sequential Test

The lands lie adjacent to the proposed zoning immediately north of the site 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.

4.2 Compact Settlement

As noted previously, the vision for Cork is to grow the city as a sustainable compact city. Ardarostig is located to the southern periphery of Cork City within the City Hinterland. The site represents a significant area of underutilised land within Ardarostig. The proposed site is one of the largest tracts of land which has the potential to accommodate a successful residential development. Rezoning of the land would promote the protection of the surrounding greenbelt 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...”

Figure 2.21: Growth Strategy Map 2022-2028.

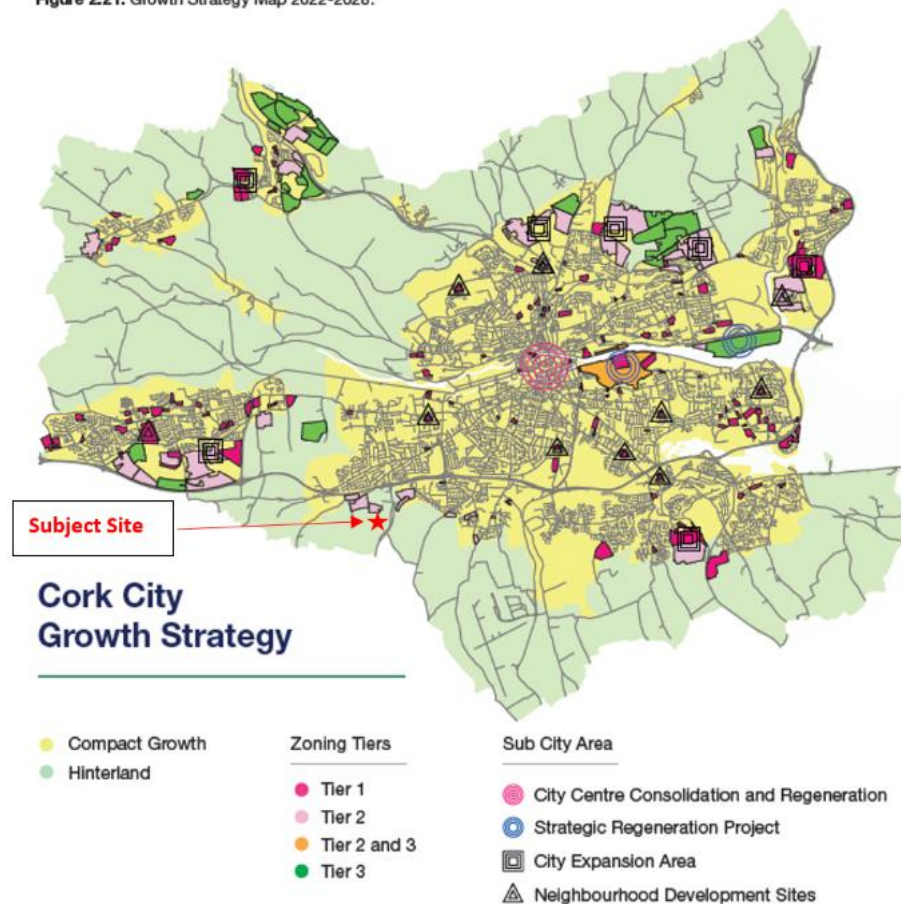


Figure 5: Extract of Figure 2.21 Growth Strategy Map 2022-2028 (site outlined in red)

The Core Strategy of the Draft Plan the 'South West Suburbs' sets a population target of 42,543 by 2028 for the area, an increase of 2,306. It is considered the growth rates and residential land use zonings to be unbalanced in the context of the City suburbs and unsustainable with regard to the existing level of available services and facilities. Our client considers there is scope to reconsider the approach to allow for a greater flexibility in how the future development within the south west suburbs are managed and consideration should be given the aggregate projected population in accordance with Section 10(2A) of the Planning and Development Act (as Amended).

In line with the National Planning Framework, in particular NPO 1a, 3a and 3c and 6, the Planning Authority should review the overall population growth and achieve a more appropriate balance and distribution of growth, as can be seen in Table 2.2 of the Draft Plan below, there is a significant disparity between the City Suburbs as the North East Suburbs proposed a growth rate of 32% while the South West only allocates a growth rate of 6%.


Core Strategy 2028: Compact Liveable Growth ¹						
 Cork City	Baseline Populations (2016)		Future Population Growth (2028)		Actual Population Growth (2028)	
	Existing Population	% of Total Population	Future Population	% of Total Growth	Actual Population Growth	Proportionate Growth Rate
City Centre	22,732	10.8%	26,218	7.0%	3,486	15%
City Centre Regeneration (new build)	–	–	23,945	2.4%	1,213	5%
City Centre Consolidation (re-use)	–	–	2,273	4.6%	2,273	10%
Docklands	1,667	0.8%	7,737	12.2%	6,070	364%
City Docks	1,667	0.8%	7,239	11.2%	5,572	334%
Tivoli Docks	0	0.0%	498	1.0%	498	–
City Suburbs	141,808	66.7%	160,289	37.3%	18,481	13%
North East Suburb	26,841	12.7%	35,561	17.6%	8,720	32%
North West Suburb	23,125	11.0%	23,728	1.2%	603	3%
South East Suburb	51,605	24.5%	58,457	13.8%	6,852	13%
South West Suburb	40,237	19.1%	42,543	4.7%	2,306	6%
Urban Town	33,886	16.1%	54,650	41.9%	20,764	61%
Ballincollig	18,159	8.6%	29,003	21.9%	10,844	60%
Blarney	2,550	1.2%	5,881	6.7%	3,331	131%
Glanmire	9,903	4.7%	15,329	10.9%	5,426	55%
Tower	3,274	1.6%	4,437	2.3%	1,163	36%
Hinterland	10,521	5.0%	11,300	1.6%	779	7%
Hinterland Settlements (3)	1,792	0.8%	1,971	0.4%	179	10%
City Hinterland (Single Dwellings)	8,729	4.1%	9,329	1.2%	600	7%
NET Total (~25% site area)	210,853²	100%	260,194	100%	49,580	24%

Table 2.2: Core Strategy Table 2022-2028.

Figure 6 Extract from Draft Plan Core Strategy Table

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.

Our client's lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs at Ardarostig, Bishopstown. As set out in detail above, we submit that the forthcoming Cork City Development Plan should consider Ardarostig with a stronger approach to development. The main points of this submission are summarised as follows:

- **The Council extend the ZO 02 New Residential Neighbourhoods zoning to include our clients' lands.**

- Our clients' lands are currently zoned as the City Hinterland under the Draft Plan however the subject site occupies an important strategic position with Metropolitan Cork which is in close proximity to commercial, business and employment areas. The subject lands are within close proximity to Cork Airport, the N71, N22, public transport, neighbourhood shopping centre and existing residential area.
- It is considered that the lands are entirely suitable for development as the site is identified as a Strategic Land Reserve (SLR 6) in the current Ballincollig Carrigaline Local Area Plan 2017.
- The rezoning of our client's site would deliver a socially inclusive and economically vibrant urban present within an existing neighbourhood and working environment. It would also provide physical, social and amenity infrastructure with new housing and promote permeability through the site to integrate the location more successfully with the adjoining community to site directly adjoining our clients' lands to the north and north west.

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.