

# Submission on Draft Cork City Development Plan 2022-2028

For Zoning of lands at Clogheen Cross.



*Conceptual Character Sketch at Clogheen Cross.*

## Introduction:

This submission has been prepared by CBA Architecture in response to public notices inviting submissions from interested parties on the Draft Cork City Development Plan 2022-2028. We welcome the opportunity to participate in the plan making process which will be key in the future development of Cork City.

This submission focuses on the zoning objectives of the north-western environs area of Clogheen.

We note there are lands West of the existing Clogheen Business Park proposed to be zoned ZO 10 *Light Industry and Related Uses* however we believe the existing residential neighbourhood of Clogheen needs to be protected, maintained and enhanced. With that we propose 2 zoning proposals to the plan at Clogheen.

## Context:

Clogheen is located c. 4km from Cork City Centre. Clogheen is located almost on the edge of the old city boundary. See Fig. 1 Cork City Boundary Extension Map below. Following a boundary extension in May 2019 Clogheen is now under the administration of Cork City Council. Blarney, Kerrypike and Tower are some of the nearby towns and settlements in the north west environs. With the city boundary extending so far out now to include Blarney and Tower and Kerrypike etc. it seems reasonable to include Clogheen Cross as a sustainable neighbourhood with it being almost immediately adjacent the original city boundary.

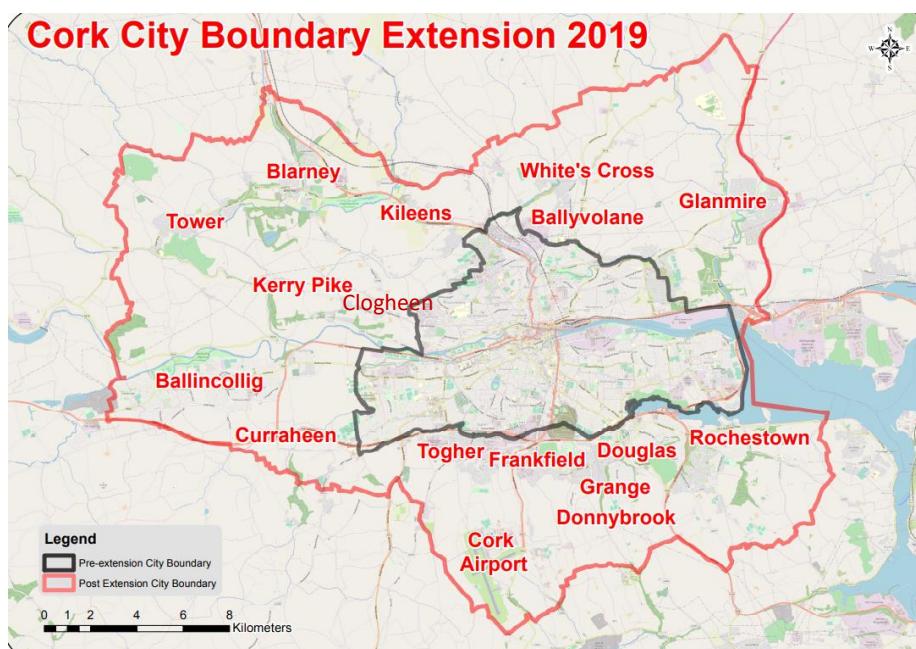


Fig. 1 - Cork City Boundary Extension Map

The existing built up area proposed for ZO 01 Sustainable Residential Neighbourhood in this submission measures approx. 5 acres. The area proposed for ZO 02 New Residential Neighbourhood in this submission measures 9 acres. Clogheen's proximity to the city centre allows for pedestrian routes and can encourage a more sustainable work life balance.

## Proposed zoning in Draft Development Plan:

The draft development plan envisages a substantial extension of the existing industrial zoned lands to the east right up to the first houses that form the cluster of dwellings that forms the nascent settlement node of Clogheen Cross. The area to be rezoned ZO 10 Light Industry & Related Uses is highlighted in blue on Fig. 2 below.



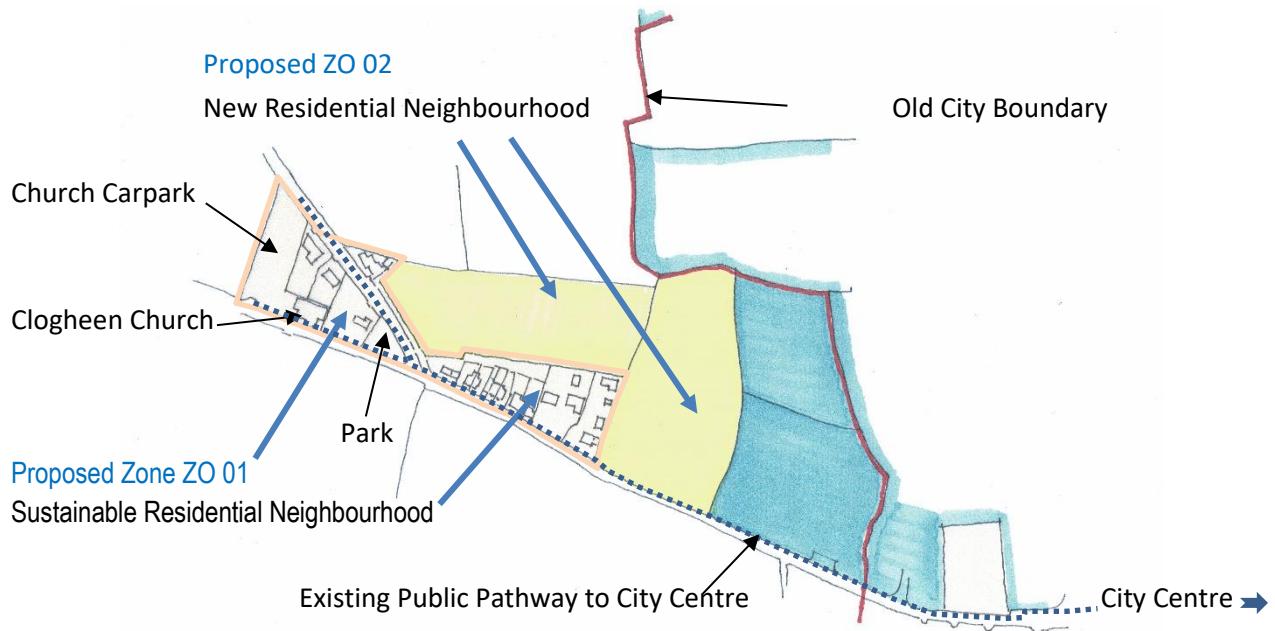
*Fig. 2 - Current Proposed Industrial Rezoning*

We take the view that this proposed rezoning is problematic and will adversely impact on the residential amenity of the existing dwellings and prevent future development that could produce more beneficial planning outcomes. In that regard we note the following:

1. "Clogheen Cross" is essentially an existing settlement node centred around the local Parish Church (Church of the Most Precious Blood). In addition to being a religious focus, the building and in particular the car park is used for more prosaic purposes such as circuit training and as a 'trailhead' for running and walking activity. In that regard it is worth noting there are benefits from excellent pedestrian connectivity back to the city centre. The public footpath finishes at the church car park and as such is frequently the turnaround or starting point for exercise activities.
2. Whilst small in area there is a strong community focus and identity in this area centred around sporting, social groups and activities.
3. Clogheen Cross did have a local shop which closed some time ago but it is reasonable to suggest that the proposed rezoning detailed below would provide impetus for development of local services.

4. The existing area of Clogheen that abuts zoned land in the Draft Cork City Development Plan including the church and its adjacent grounds, the adjacent houses, the green/small park at Clogheen Cross, and the houses down the hill that lead into the city is an existing "Residential Neighbourhood". We believe it should be recognised as such, and zoned as ZO 01 Sustainable Residential Neighbourhood.
5. In that regard it is worth noting that along with the rest of Ireland at this time there is a pent up demand for residential development and this is equally true in the area around Clogheen Cross which is adjacent to Apple, which is the biggest employer in Cork.
6. This demand for housing in this area has led to pressure to permit 'one-off' houses which is contrary to the goal of retaining compact urban footprints and preventing urban sprawl into rural areas.
7. The current iteration of the Draft Development Plan will do nothing to assuage this pressure and justified aspiration for people to live close to their home place or close to their employment locations. A quick review suggests that the nearest land to Clogheen Cross that is zoned for expansion of residential development appears to be Kerry Pike which is 3km away with no pedestrian connectivity to the city. No residential zoned land is proposed in practical proximity to Clogheen Cross. Substantial amount of lands around the city are already Zoned for Industrial and large areas of land are proposed to be Zoned ZO 10 for Light industry and Related uses North of Apple and at Blarney Business Park. See Appendix Map.

We take the view that a more modest extension of the industrial zoned land complemented by a parallel residential rezoning illustrated in Fig. 3 below would provide a more beneficial planning outcome.



*Fig. 3 - Alternative Zoning at Clogheen Cross.*

We believe that these changes to the draft development plan would have the following positive outcomes.

1. The ZO 01 Sustainable Residential Neighbourhood zoning in the immediate Clogheen Cross Area would define and acknowledge what is in effect an existing settlement node. This could also provide potential for more housing on large existing sites.
2. We note that Cork City Council has adopted this approach in regards to the area at Mount Desert along the Lee Road and it is reasonable to suggest that a similar approach is justified here.
3. The proposed ZO 02 New Residential Neighbourhood could then be fitted between Clogheen Cross and the extended industrial zoned area. This could have the double benefit of providing opportunities for people to buy houses close to their work or community and at the same time with possible design shown at Fig. 4 below provide a buffer between the residential and industrial areas. Many of the making places objectives can be met with a similar approach to that suggested in the layout below at Fig. 4 and indeed the Character sketch Fig. 6 further on.
4. The positioning of this buffer/open space will have a huge added benefit of protecting the visual amenity that exists on this "Gateway" into the city and allowing the more elevated land to screen to lower lying land ZO 10 Light Industry and Related Uses which is more suitable for buildings of the associated scale and height of Industrial.
5. The construction of a new residential neighbourhood would reduce the pressure for approval of 'one-off' houses in the area and the consequent increase in urban sprawl.
6. It would still allow a substantial extension to the industrial zoned lands and provide consequent employment opportunities.



*Fig. 4 - Indicative Residential Layout to complement Alternative Rezoning*

## Commentary on compliance with objectives of ZO 01 Sustainable Residential Neighbourhoods - proposed alternative rezoning:

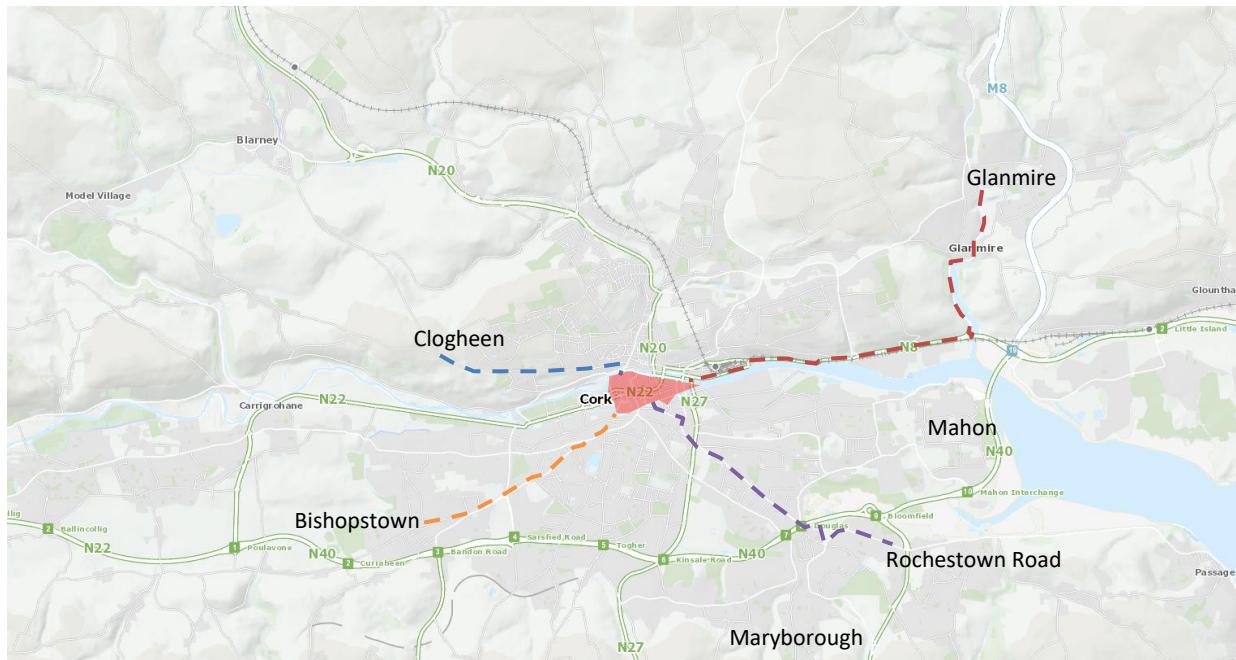
ZO 01 Sustainable Residential Neighbourhoods	
Objectives	Comment
<b>Zoning Objective 1:</b> To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.	Clogheen Cross is a small established settlement node focussed on the local Church. It has a strong community identity and rezoning to ZO 01 would secure its identity and amenity values into the future.
<b>ZO 1.1</b> The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City's built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents.	Clogheen Cross meets many of these traits with community facilities available and an established community ethos.
<b>ZO 1.2</b> Development in this zone should generally respect the character and scale of the neighbourhood in which it is situated. Development that does not support the primary objective of this zone will be resisted.	Clogheen Cross is an established residential cluster / nascent settlement node immediately adjacent to the biggest employer in Cork with strong pedestrian connectivity both to employment areas and to the City Centre.
<b>ZO 1.3</b> Primary uses in this zone include residential uses, crèches, schools, home-based economic activity, open space and places of public worship.	Clogheen Cross meets these requirements with existing Church, sporting and social networks. With the additional suggested zoning there will be an opportunity to add to the open space, amenity routes and to build community and neighbourhood centres to strengthen these existing networks.
<b>ZO 1.4</b> Uses that contribute to sustainable residential neighbourhoods are also acceptable in principle in this zone provided they do not detract from the primary objective of protecting residential amenity and do not conflict with other objectives of this Development Plan. Such uses include but are not limited to: small-scale local services including local convenience shops; community facilities; cultural facilities; hotels and hostels; live-work units; service stations (petrol filling stations); local medical services; third level education institutes; community based enterprise or social enterprises, health facilities including hospitals.	Clogheen Cross is adjacent to large scale employment opportunities. The proposed alternative rezoning would serve to demarcate it and allow for the development of local services in a residential area adjacent to industrial zoned areas but buffered from them. The current proposed zoning could arguably lead to the existing residential environment being subsumed into the industrial zone which would be detrimental to other planning objectives such as existing scenic / tourist routes, pedestrian connectivity and residential amenity values.
<b>ZO 1.5</b> Where it can be suitably justified, the expansion of zoned Neighbourhood and Local Centres is open for consideration in this zone provided they meet the criteria for such centres set out in Chapter 7 Economy and Employment.	Neighbourhood and Local Centres are not the primary focus in this submission however they can be facilitated in any application regarding new residential in the area identified for ZO 02. Clogheen Cross as referenced previously is immediately adjacent to the Hollyhill Industrial Estate which contains Apple which is the biggest employer in Cork. The proposed alternative residential rezoning would complement this activity.
<b>ZO 1.6</b> The employment policies in Chapter 7. Economy and Employment designate particular locations for offices, office-based industry and major retailing development, and these uses are not generally permitted in this zone, unless they are community-based enterprises or social enterprises.	Clogheen Cross as referenced previously is immediately adjacent to the Hollyhill Industrial Estate which contains Apple which is the biggest employer in Cork. The proposed alternative residential rezoning would complement this activity. Community based enterprises or community centres can be considered as part of any proposed development within the area identified for ZO 02 New Residential Neighbourhood.

**ZO 1.7**

Many green areas of open space in residential estates in Cork City area included in this zone. There will be a presumption against development on all open space in residential estates including any green area or public amenity area that formed part of an executed planning permission for development and was identified for the purposes of recreation or amenity open space, including land which has been habitually used as public open space. Such lands shall be protected for recreation, open space and amenity purposes.

**Existing greenspace is presumed to be retained and greenspace, amenity routes and visual amenity are a key focus in this submission.**

It is noted that proximity of Clogheen Cross to the City Centre is closer than many other successful residential neighbourhoods



*Fig. 5 - Map showing Clogheen Cross close proximity to City Centre*

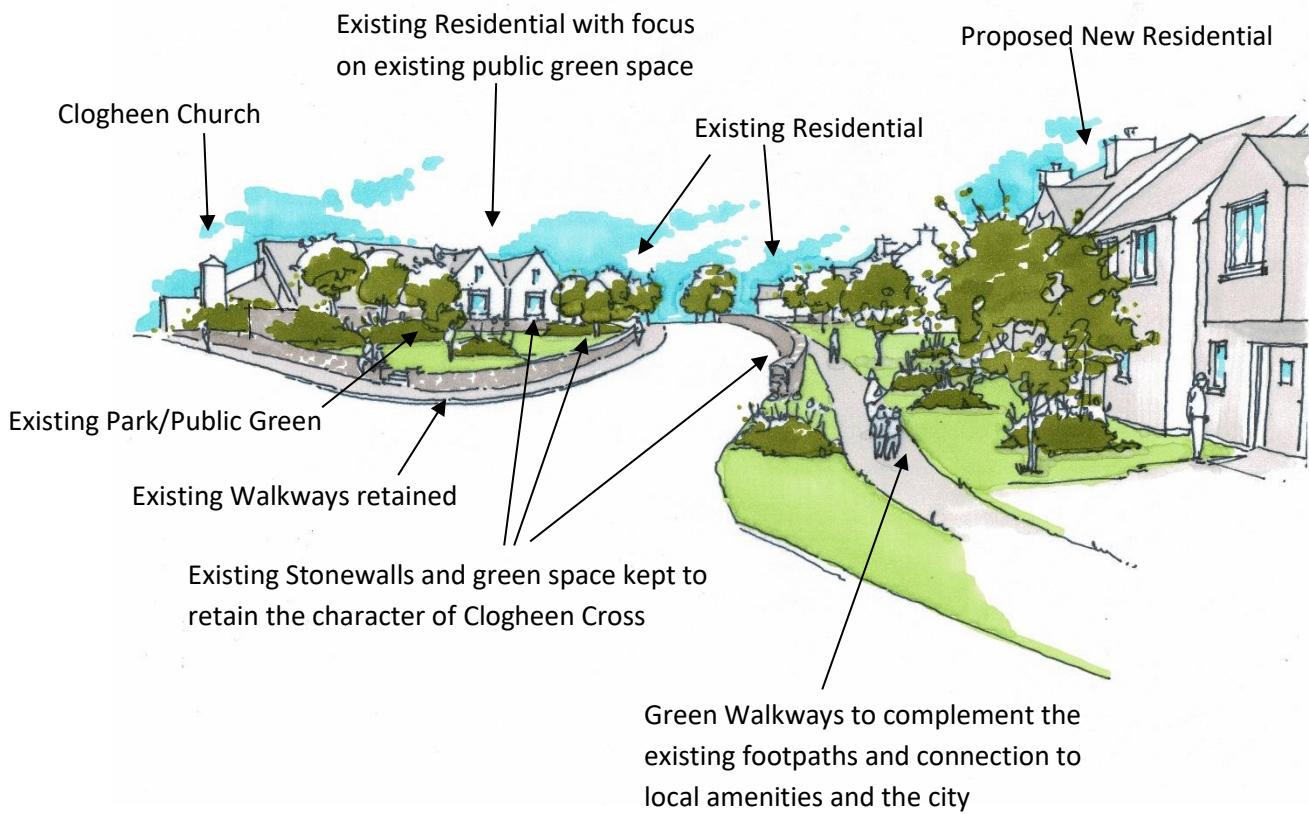
- Clogheen ————— 3.8km to City Centre
- Bishopstown ————— 5.6km to City Centre
- Glanmire ————— 8km to City Centre
- Rochestown ————— 6.5 km to City Centre

## Commentary on compliance with objectives of ZO 02 New Residential Neighbourhoods - proposed alternative rezoning

ZO 02 Sustainable Residential Neighbourhoods	
Objectives	Comment
Zoning Objective 2: To provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.	Clogheen Cross already has some social and physical infrastructure - the proposed alternative rezoning would provide impetus to supplement them.
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.	As referenced previously there is justification for residential development in this area.
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.	Clogheen Cross is a nascent settlement zone with some existing community facilities and networks. The proposed alternative rezoning will open the potential to meet the other provisions by utilising some of the greenfield sites whilst protecting the visual amenity on this "Gateway" into the city centre.
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.	As outlined above the proposed alternative rezoning will provide demarcation from existing uses and their proposed extension. It will recognize an existing settlement pattern and identify its extent allowing it to provide a buffer to the adjoining industrial use and at the same time contribute to the goal of compact urban settlement patterns by reducing pressure / justification for one off houses and consequent ribbon development.

## Commentary on the combined benefits for Clogheen and adjoining areas:

It is demonstrated in the submission particularly in Fig. 4 and Fig. 6 below how the existing settlement of Clogheen can benefit and be strengthened with the inclusion of additional ZO 02 land to ultimately function as one cohesive neighbourhood building on the existing social networks that exist in this community. This zoning can contribute to National Policies as well as local needs and encourage sustainable living.



## Conclusion:

We would be appreciative if Cork City Council could give consideration to the benefits of including our proposal in their preparation of the 2022-2028 Development plan.

We ask that the existing area of Clogheen that abuts zoned land in the Draft Cork City Development Plan including the church and its adjacent grounds, the adjacent houses, the green/small park at Clogheen Cross, and the houses down the hill that lead into the city be zoned ZO 01 Sustainable Residential Neighbourhood. We ask that adjacent lands as identified in this submission be zoned ZO 02 new residential neighbourhood to protect and maintain the existing residential amenity.

As outlined in detail above, We believe Clogheen Cross is an established residential cluster / nascent settlement node immediately adjacent to the biggest employer in Cork (Apple)with strong pedestrian connectivity both to employment areas and located only 4km from the City Centre. Our proposal allows for strengthening pedestrian routes and can encourage a more sustainable work life balance. Our proposal would appear to be the only opportunity currently put forward to address the housing demand within walking distance of existing and growing employment.

The NPF highlights the urgent requirement for a major increase in the delivery of housing within our city boundaries and to utilise existing neighbourhoods more effectively to provide housing.

We respectfully request that the Planning Authority give consideration to the proposals presented in this carefully considered submission and we trust it will be taken into account as part of the consultation process for the review of the Cork City Council Development plan.

Please contact us if you have any questions on our submission.

Yours Sincerely

Stephen Brennan

For and On Behalf Of

CBA Architecture

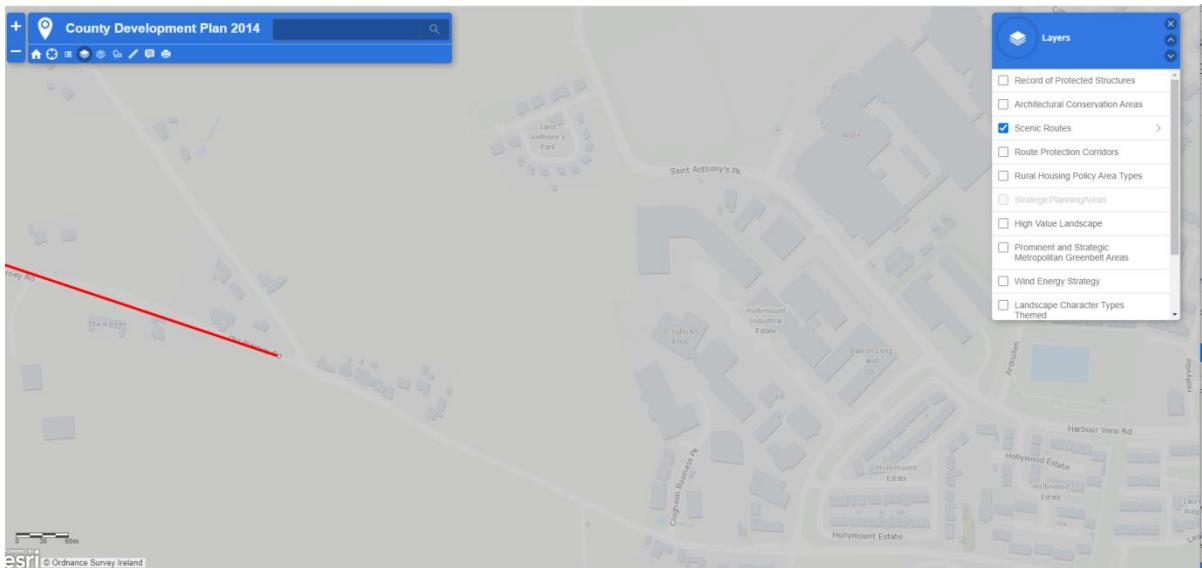
## APPENDIX:

### National Policy Context:

"A core objective of the National Planning Framework is to build an average of 25,000-30,000 new home annually to meet future needs and to deal with the current demand supply issues caused in the last decade. Many experts argue that 25,000-30,000 may still not be enough. Notwithstanding this, the NPF highlights the urgent requirement for a major increase in the delivery of housing within our city boundaries and to utilise existing neighbourhoods more effectively to provide housing."

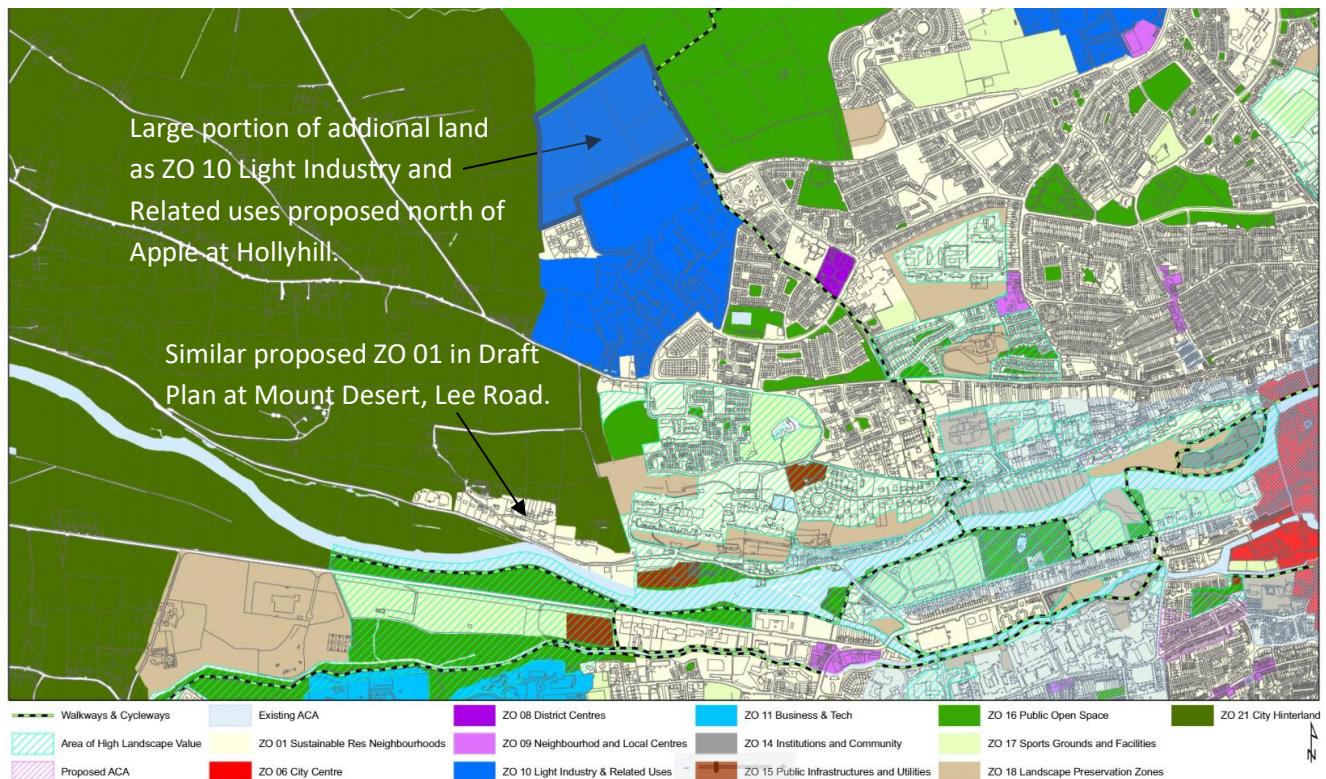
### Adjacent Scenic Route:

Cork County development plan 2014-2020 shows a scenic route which runs from Clogheen Cross, through Kerrypike, out to Tower and loops around to Blarney. Low lying, low to medium density residential zoned land within an already established neighbourhood would be more suitable rather than Light Industry with warehousing and naturally largely scaled buildings.



A new area just south of Clogheen Cross at Mount Desert on the Lee Road has been included as Sustainable residential neighbourhood in the Draft Development Plan. If this area at the Lee Road qualifies for ZO 01 then the same should apply for the area at Clogheen Cross where there is a residential neighbourhood based around a church and has easy access into the city on foot.

Map showing large Industrial Zoned north of Apple and similar ZO 01 approach proposed in Draft Cork City Development Plan:



Photos:



