



Submission to Draft Cork City Development Plan 2022 -2028

Provision for New Residential Land Use at Model Farm
Road, Cork

Montip Horizon Ltd.

September 2021

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Connecting places.**

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01. Introduction

1.1 SUBMISSION PURPOSE

This submission has been prepared on behalf of Montip Horizon Ltd in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 (Draft CDP) and in particular in relation to the draft policies and zoning objectives for lands in our client's land ownership at Model Farm Road which will form part of the Cork City Development Plan 2022-2028. For reference, the extent of lands subject to this submission are outlined in red in Figure 1.1.



Figure 1.1 Subject Lands outlined in red.

1.2 SUBMISSION CONTEXT

HW Planning made a submission to Cork City Council at the Stage 1 (Pre Draft Public Consultation) for the review of the Cork City Development Plan 2015 – 2021 on behalf of our Montip Horizon Ltd. The key point put forward in the submission was that the function of western section of the metropolitan greenbelt, in the vicinity of Model Farm Road, needed to be re-evaluated having regard to emerging planning policy.

The lands which were formerly within the functional area of Cork County Council are proposed to be zoned as ZO 21 – City Hinterland in the Draft Cork City Development Plan. It was highlighted at the Pre-Draft Stage that the current Cork County Development Plan, 2014 - 2020

identified a number of Strategic Land Reserves to accommodate the anticipated economic and population growth in the county. The subject lands are located within SLR 7 where future expansion was most likely to be delivered and where lands are not dependent on any of the necessary infrastructure delivery needed for this planned urban expansion to take place.

The lands are adjacent to Model Farm Road and existing residential estates and are ready to accommodate residential development independent of the wider planning policy context. The lands are also well placed to benefit from existing transport connectivity and proximity to major employment, educational and service centres at Ballincollig, Bishopstown and Curraheen.

We are of the opinion that the Draft Plan has failed to recognise the development potential of our client's lands which we consider would support the principles of compact growth and contribute to the delivery of housing over the lifetime of the forthcoming development plan.

1.3 SUBMISSION REQUEST

We request that the lands subject to this submission, as identified at Figure 1.1., are rezoned from ZO 21 – City Hinterland where the objective is “*to protect and improve rural amenity and provide for the development of agriculture*” to ZO 02 - New Res Neighborhoods where the objective is “*to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure*”.

The pertinent planning considerations which establish the subject lands appropriate for residential development are discussed at Section 02 of this submission. An extract from the Draft City Development Plan is provided below to identify our client's lands.

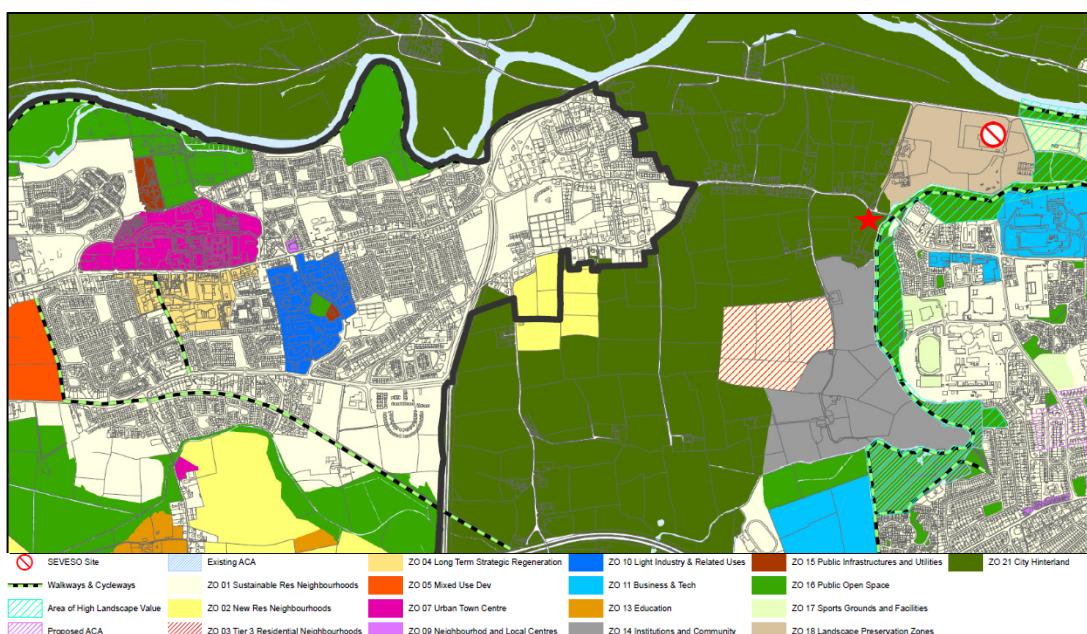


Figure 1.2 Proposed Zoning Map (Map 8) identifying the location of our client's lands.

02. Planning Considerations

The subject lands are excellently placed to facilitate residential development during the lifetime of the forthcoming development plan. As is well documented, there is an acute shortage in the delivery of residential development and we question whether the lands currently selected in the Draft Plan are best placed to provide for the critical shortage and meet the housing targets as set out in the Core Strategy.

The lands subject to this submission are well serviced by existing infrastructure and served by two of Cork City's most frequent bus services the 220 and 208. The lands are also well placed to utilise and support existing social and community infrastructure as required for the zoning of residential lands.

The zoning and subsequent development of the lands subject to this submission would represent the proper sequential development of the city suburbs. We highlight that the lands subject to this submission are not reliant on the delivery of third party infrastructure to bring much needed homes to the market.

2.1 SEQUENTIAL RESIDENTIAL DEVELOPMENT

The subject lands are eminently suited to the delivery of residential development in an area which is a sequential extension of the existing urban area. The attached letter from OBR (Model Farm Road) Developments Limited highlights that our clients have secured the relevant consent in order to extend access and services via the adjacent Riverside Farm housing development. Our clients' lands are capable of delivering residential units in the short term due to the existing infrastructure services in the area. The lands in question are more akin to residential development than rural amenity and agricultural use as result of their receiving context abutting ZO 14 – institutional and community uses to the south and established residential community and open space to the west.

The Draft Development Plan does not identify any Objective ZO 02 – New Residential Neighbourhood zoned lands in the vicinity of Model Farm Road (south-western suburbs). We note that lands south and east of Ballincollig have been identified, as have lands to the south of the N40 (along Waterfall Road) for new residential development.

The Planning Authority will be aware that Appendix 3 of the National Planning Framework (NPF) which sets out the national guidance for a two-tier approach to land zoning. Tier 1 lands are those capable to connect to existing development services including roads, footpaths, public lighting and drainage. Such lands are identified as being *"generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands...Inclusion in Tier 1 will generally require the lands to within the footprint of or spatially sequential within the identified settlement."* Tier 2 lands are those that are *"not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e the lands are currently constrained due to the need to deliver some or all development service required to support new development, i.e road or footpath access including lighting...These lands may be positioned with the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where requirement to fulfil the*

spatially sequential approach to the location of new development within the identified settlement.”

Our client's lands are both serviceable by physical infrastructure in the short term and supported by community infrastructure which would in our professional opinion meet the criteria for Tier 2 lands as set out in the NPF.

The Planning Authority will note the attached letter from OBR (Model Farm Road) Developments Limited which highlights that our clients have secured the relevant consent in order to extend access and services via the adjacent Riverside Farm housing development. This demonstrates that the development of the subject lands would be contiguous to existing Tier 1 zoned lands and comply with the requirements of the NPF in terms a spatially sequential approach to the development of land.

2.2 ALIGNMENT WITH THE CORE STRATEGY

The Draft Plan stipulates in its core strategy that the population of the South West Suburbs, in which the subject lands are located, is expected to reach 42,543 no. persons by 2028 i.e., an increase of 2,306 no. persons. In reference to the South West Suburbs, the Joint Cork Housing Strategy and the Housing Needs Demand Assessment (HNDA) states that *“Given the amount of land available, the area will be important in delivering a range of housing types and tenures to meet overall demand in the City, including social housing delivered through Part V and direct delivery. The South-West Suburbs contain both of Cork’s major third-level institutions, UCC and MTU, as well as other major public institutions such as Cork University Hospital. There will therefore likely be continued demand for private rented accommodation in particular in the area as well as for purpose-built student accommodation. Delivery of this housing will be important to meet this demand, provided it is delivered in accordance with the policies of the Cork City Development Plan to ensure appropriate housing quality and tenure mix.”*

Notwithstanding the above, Section 2.53 of the Draft Plan states that the Growth Strategy *“... has a lower potential population yield than set out in the Core Strategy Table (Table 2.2), when the AHS of 2.49 is applied. This difference is based on the expected increased densities on sites with extant planning permissions. This will be achieved by way of future planning permissions granted in accordance with the objectives set out in this plan.”*

The Growth Strategy for the South West Central Urban Area (under City Suburbs) indicates that Tier 1 and 2 zoned lands have the potential to deliver 561 no. units as below.

Growth Strategy 2028 (Tier 1 & 2) ³				
Location	Underutilised Sites (Net Hectare's)	Potential Tier 1 & 2 Yield (Units)	Tier 1 Potential Yield (Units)	Tier 2 Potential Yield (Units)
South West Central Urban Area	32.4	926	365	561

The Tier 1 and 2 zoned lands therefore have the capacity to accommodate 2,305 no. persons based on the average of 2.49 no. persons per unit.

Having regard to the emphasis placed in the Joint Cork Housing Strategy and the Housing Needs Demand Assessment (HNDA) on the importance of the South West Suburbs to meet the overall demand of the city, we are of the opinion that the quantum of residential zoned lands should be increased, in particular Tier 2 lands.

We understand that a range of assumptions have been applied to the structure of the growth strategy however it is our opinion that appropriate lands should be identified as Tier 2 where they can demonstrate the capacity to deliver much needed residential development. The serviced lands located in the South West Suburbs and subject to this submission are in a position to be developed during the lifetime of the forthcoming Development Plan and would contribute to the acute shortage of residential units.

2.3 PROVISION FOR A COORDINATED LAND-USE AND TRANSPORT STRATEGY

The subject lands are situated in a sustainable location and can be accessed via the adjacent Riverside Farm housing development. As demonstrated in the extracts below from the Cork Metropolitan Area Transport Strategy (CMATS), the area of the subject site is well connected by existing bus services and positioned in close proximity to primary and green cycle and walking routes.

Figure 2.1 Extract from CMATS Cycle Network Map (indicative site location indicated with a red star)

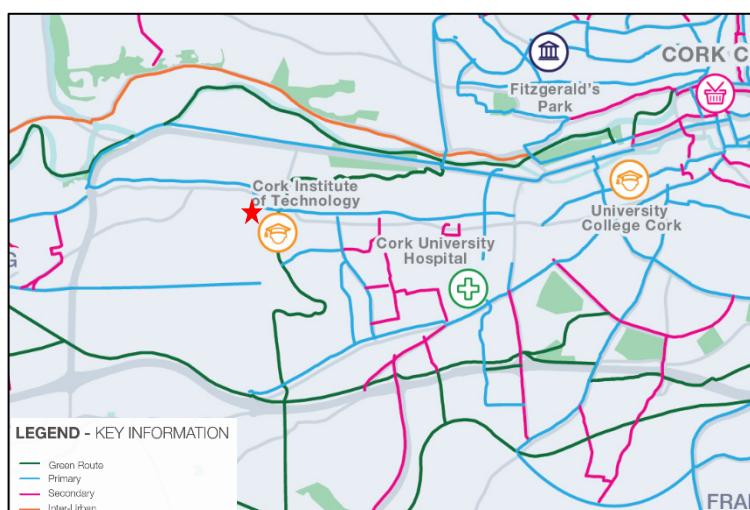
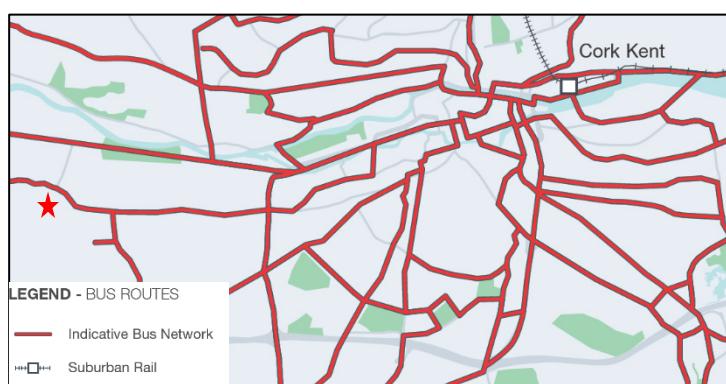


Figure 2.2 Extract from CMATS BusConnects Route (indicative site location indicated with a red star)



Bus route no. 220 from Ballincollig to Carrigaline operates a 15 no. minute peak frequency service along Model Farm Road with existing bus stops located less than 200 m from the subject site. In addition, bus route no. 208 is accessible further east (c. 700 m) and provides a 10 no. minute peak frequency service from Ashmount to Curraheen.

In addition to the above, the subject site represents a significant opportunity to develop lands adjacent to a designated greenway walkway and cycleway. The Curraheen greenway to the east of the subject site, along the Curraheen River, is currently undergoing upgrade works (due to be completed Autumn 2021) and will provide c. 4.4 km of enhanced connectivity for pedestrians from Curraheen Road to Model Farm Road. The Curraheen greenway provides excellent connectivity towards Carrigrohane Road (c. 500 m to the north), the IDA Business Park (c. 700 m to the east) and the Muster Technological University (c. 500 m to the south-east). These large scale employers and educational facilities in the vicinity contribute to the desirable location of the subject lands.

The delivery of housing along existing transport corridors such as Model Farm Road would promote the successful implementation of a coordinated land-use and transport strategy. CMATS identifies Model Farm Road as a strategic walking route noting its purpose and upgrade proposal as "*improve links between schools, employment centres, CIT and bus/ future light rail*". We are of the opinion that integrating and directing development along key transport routes including bus corridors and greenways will provide more sustainable forms of travel.

Our client's lands are excellently located in an existing sustainable suburban neighbourhood that can be accessed from Model Farm Road. There is also a wide range of local facilities and amenities within close proximity that would further enhance the residential development of these lands. The designation of ZO 02 – New Residential Neighbourhood lands along key transport corridors, such as Model Farm Road, would consolidate the urban edge land uses and be in the interest of sustainable development.

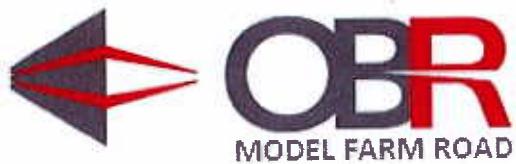
03. Request

As outlined in this submission to the Stage 2 Public Consultation Draft City Development Plan 2022-2028, we consider that the next phase of the Development Plan process should zone the lands off Model Farm Road, subject of this submission, as ZO 02 - New Residential Neighborhoods. As established, the subject lands are well placed to deliver residential development during the lifetime of the forthcoming Development Plan in accordance with the objective *“to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure”*.

The Draft Plan has failed to recognise the development potential of the south west suburbs in delivering housing to meet the anticipated population growth. It is our opinion that our client's lands would support the principles of compact growth and contribute to the delivery of housing in the urban edge over the lifetime of the forthcoming development plan.

The proposed development have the potential to be accessed and serviced via the adjacent Riverside Farm housing development and being contiguous to existing Tier 1 zoned lands, comply with the requirements of the NPF in terms a spatially sequential approach to the development of land.

We request that the lands subject to this submission, as identified at Figure 1.1., are rezoned from ZO 21 – City Hinterland where the objective is *“to protect and improve rural amenity and provide for the development of agriculture”* to ZO 02 - New Res Neighborhoods where the objective is *“to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure”*.



I, Dan O'Brien Director of OBR (Model Farm Road) Developments Limited ("the Company") hereby confirm that the Company is the legal owner of the property the subject of Folio CK17619 known as Riverside Farm, Model Farm Road, Cork and the relevant services pertaining thereto.

I can confirm that I am prepared to make available both access and relevant services to [McCarthy Developments Limited].

A handwritten signature in blue ink that reads "D. O'Brien".

Dan O'Brien

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