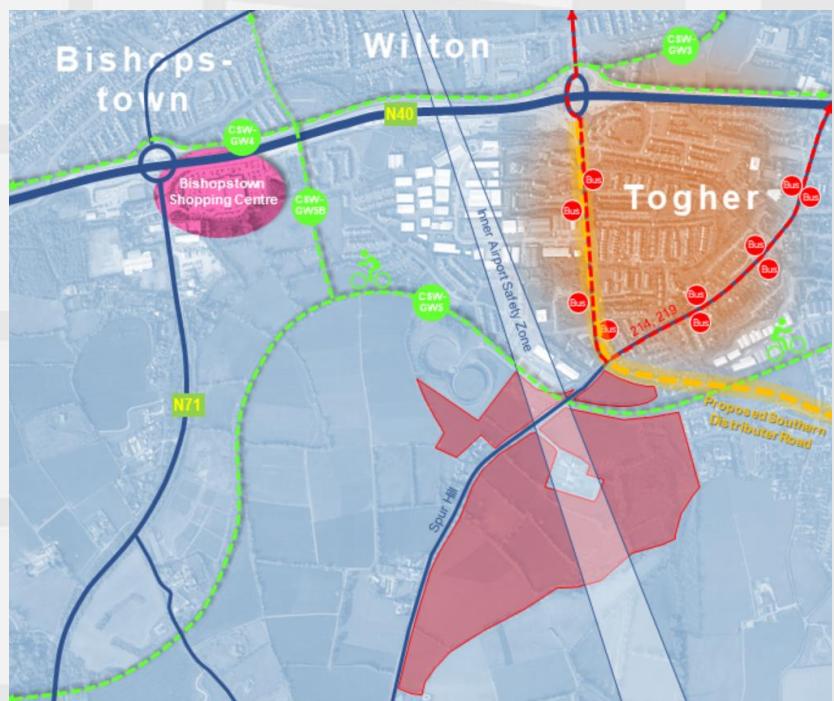


Submission to Draft Cork City Development Plan 2022-2028

Amendment to Zoning of South City Environs at Spur Hill, Doughcloyne, Togher

on behalf of Society of African Missions Trustees (SMA)

October 2021



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Society of African Missions Trustees (SMA) 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. Accordingly, this submission requests the following provisions in the forthcoming CDP:

- We request that the southern portion of our client's lands be zoned as Tier 3 "ZO-03: Residential Neighbourhood" in order to optimise the development potential of this strategic development area.
- Our client's lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs at Spur Hill, Doughcloyne, Togher. Our client welcomes that the northern portion of their landholding continues to be zoned residential "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.
- It is considered that the lands are entirely suitable for development as the site is identified as a Strategic Land Reserve (SLR 5) in the current Ballincollig Carrigaline Local Area Plan 2017.

This submission is structured as follows:

1. Site Context;
2. Planning Policy;
3. Rationale for Submission Request; and
4. Conclusion.

2. Site Context

The subject lands are located within the townland of Doughcloyne which is located on the south western fringe of the South Environs of Cork City. Doughcloyne is located approximately 5.3km southwest of the Cork City Centre. The site is located 800m to the south of Sarsfield Road Roundabout on the N28

South Ring Road and Wilton District Centre. Sarsfield Road is an important arterial route linking Doughcloyne and Togher to Wilton and the South Link Road.

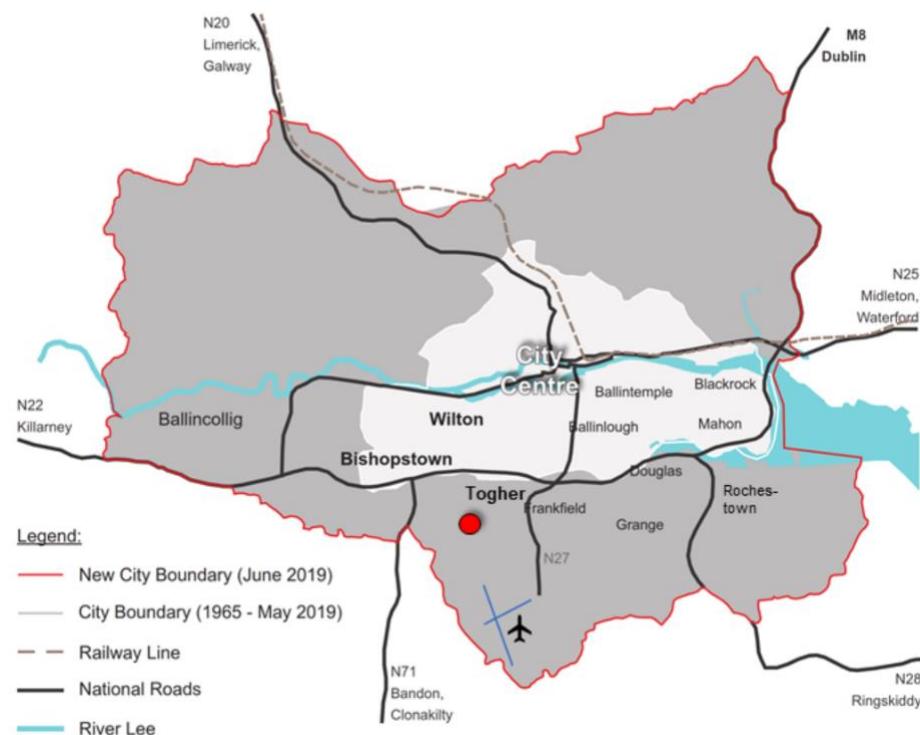


Figure 1: Map illustrating wider location of lands at Togher

The site is an undeveloped greenfield site in agricultural use which is bound by a local road - L2452. The old Bandon/Kinsale Railway line lies to the north of the site. The surrounding area to the north and east of the site is predominantly residential in character with some commercial and industrial properties. A church and a funeral home are located 300m from our client's lands on Sarsfield Road. The area south and west of the site is predominantly rural in character. The Fellowship House which is not in the ownership of our client is located within the centre of this landholding and does not form part of this submission as illustrated in figure 2 below.

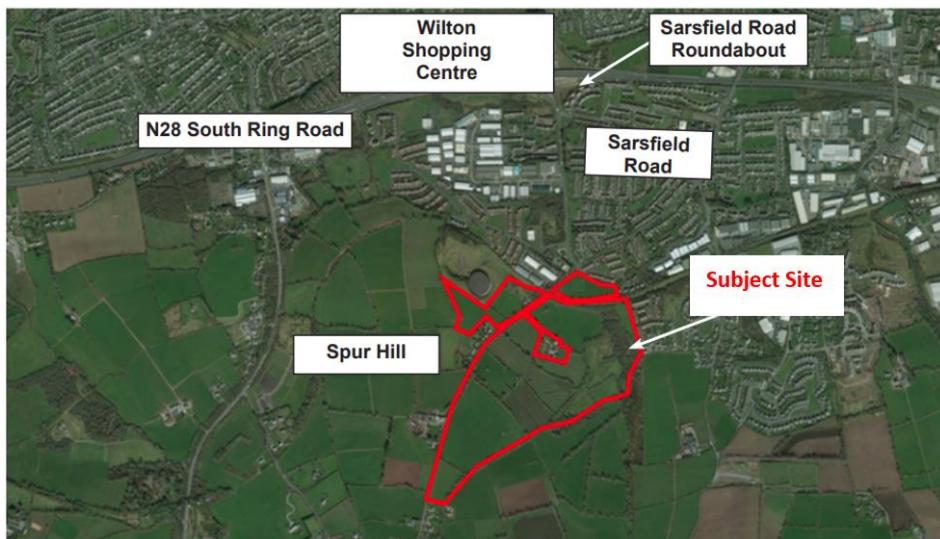


Figure 2: Site Location Aerial Image – site outlined in red.

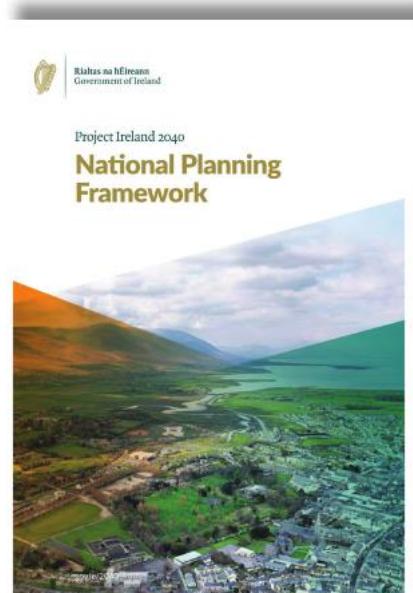
The site is located 7km north east of Cork Airport and the Airport Business Park. The area is served by a good quality bus services, with Bus Eireann being the primary public bus transport provider with the company operating two services, the 214 and the 219-bus route in the vicinity of the site.

3. Planning Policy

3.1 National Planning Framework – Project Ireland 2040

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. It is expected that a significant portion of these homes will be required in Cork Metropolitan areas, such as the Cork South Environs.

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.

A new tiered approach to land zoning was established in the NPF, with National Policy Objective (NPO) 72a stating:

"Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan".

The NPF states that further lands may be included in development plans that cannot be serviced during the life of the plan based on an infrastructural assessment of the planning authority. These cannot be categorized as Tier 1 or Tier 2 and should not be zoned for development or included within a development plan core strategy for calculation purposes.

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.

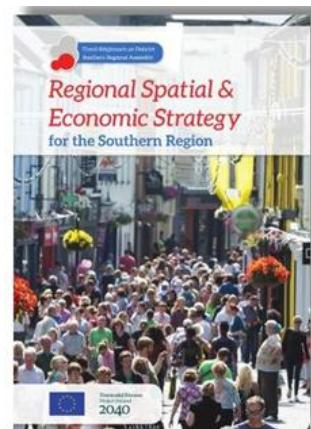
Compact Growth Objectives:

- 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.

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.

Objective 1b of the Cork MASP seeks to promote the Metropolitan Area as a cohesive area where population and employment growth are integrated. The RSES promotes the concept of the 'Right Location' which prioritises the provision of new homes at the right location that can support sustainable development at an appropriate scale. The RSES also supports the concept of sustainable, employment-led growth in settlements in the Cork MASP and wider region.



3.3 Cork County Development Plan 2014

Prior to the Cork City Boundary extension in 2019, the subject lands were part of Cork County and under the existing Cork County Development Plan (CDP) 2014.

According to the CCDP, Doughcloyne lies within the South Environs. Objective 3-1 of the 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.”

Togher 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.”***
(emphasis added)

1.3 Ballincollig Carrigaline Municipal District Local Area Plan (LAP) 2017

Our client's lands form part of the existing settlement boundary of the South Environs in the Ballincollig Carrigaline MD LAP 2017. In the 2017 Ballincollig Carrigaline MD LAP. The strategic aim and vision for the South Environs is as follows:

- 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; and
- Support appropriate proposals for urban regeneration initiatives in Douglas and elsewhere in the Environs.

As illustrated in Figure 3 below, the northern portion of our client's lands (land parcel 'A') is currently zoned Medium A density Residential and is within the development boundary of the Cork City South Environs. Objective SE-R-02 of the LAP sets out the following objective for the site:

‘Medium A density residential, estate type layout.’

Below the Medium A density residential zoning lies a utility zoning within the South Environs. Objective SE-U-01 of the LAP sets out the following objective:

‘Maintain pedestrian walk on route of old railway line.’

The north western portion of our client's lands (land parcel 'B') is zoned existing built-up area in the Ballincollig Carrigaline MD LAP 2017. Objective ZU 3-1 of the

CDP 2014 establishes the following framework with respect to the 'Existing Built-up Areas':

'Normally encourage through the Local Area Plans development that supports in general the primary land use of the surrounding existing built up area. Development that does not support, or threatens the vitality or integrity of, the primary use of these existing built up areas will be resisted.'

Land parcel 'C' is located within the 'Prominent and Strategic Metropolitan Greenbelt Area' as set out in the Cork County Development Plan 2014.

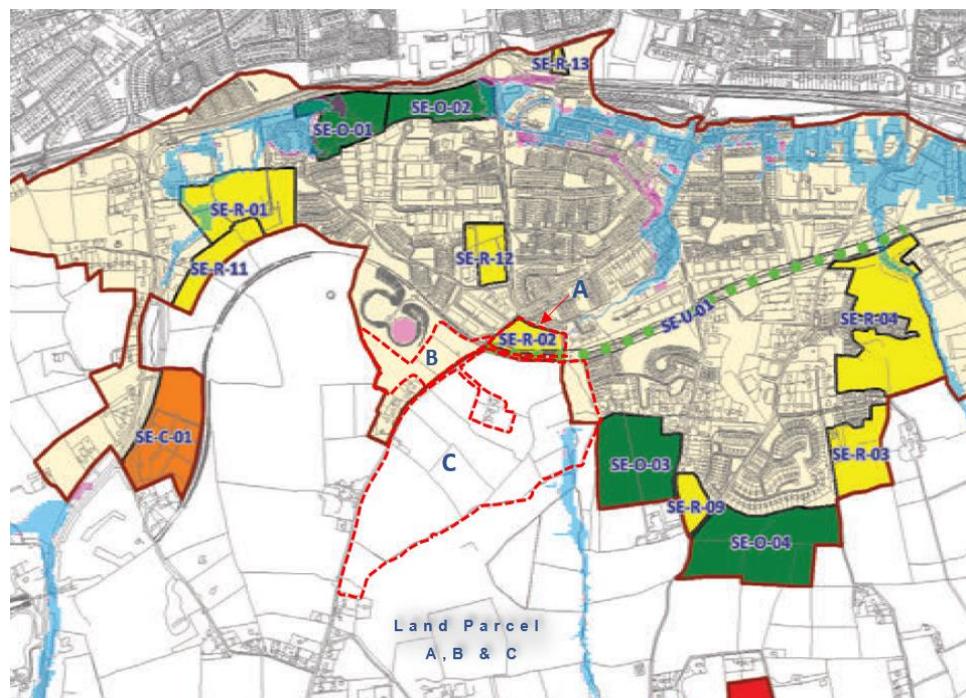


Figure 3- Extract from 2017 Ballincollig Carrigaline MD LAP (site outlined in red)

1.4 Strategic Land Reserve

The strategic area of the southern suburbs has potential to accommodate strategic residential development to accompany the existing employment development within the area which is consistent with national and regional planning policy objectives for compact growth, based on sustainable travel modes, and providing a high quality mixed use living environment.

As part of the initiative by Cork County Council, set out in the Ballincollig-Carrigaline Municipal District Local Area Plan 2017 (LAP), a 'Strategic Land Reserve' (SLR) was identified across 12 potential sites in Metropolitan Cork. This is to ensure that the county not only has sufficient residential zoned lands to meet its stated housing and population targets, and the anticipated economic and population growth in the State over the coming decades, which is very likely to be concentrated at locations like Metropolitan Cork which are best positioned to drive increased economic activity.

The subject lands were included as a portion of the lands identified as 'SLR 5 – Togher/Doughcloyne' in the LAP. A detailed assessment of the SLR's was undertaken to identify the lands that many have the best chance of delivering housing. As a result of the detailed assessment, it has been noted within the site assessment process that these sites '*have a long-term potential to contribute to compact urban growth and can be considered in future reviews of the City Development Plan.*'

3.4 Cork Metropolitan Area Transport Strategy (CMATS) 2040

The CMATS aims to deliver an integrated transport network that addresses the needs of all modes of transport, offering better transport choices, resulting in better overall network performance and providing capacity to meet travel demand and support economic growth.

Key outcomes for Doughcloyne in the strategy include:

- Southern Distributor Road (SDR) - which would address the significant shortfall in local connectivity in the Southern Environs;
- A primary cycle network within the Southern Distributor Road;
- Improvements to the lower Pouladuff Road to Togher Road cycle network;
- A greenway route following Tramore River, including Douglas, Tramore Valley Park and Togher;
- A greenway cycle network comprising of a traffic free repurposed derelict railway at the Old Bandon/Kinsale Railway line; and
- A radial bus service, which will form part of the wider city BusConnects Network. This supporting served by a new bus service going via Dublin Hill to Togher and it is expected to operate at a frequency of every 15 minutes.

3.5 Draft Cork City Development Plan 2022-2028

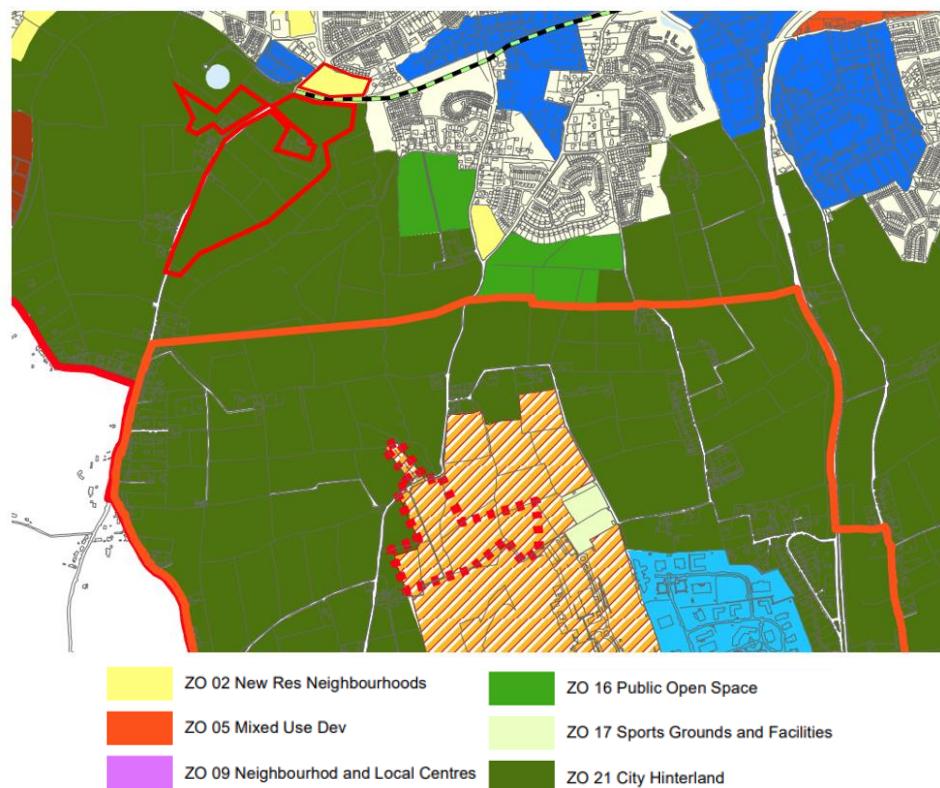
3.5.1 Land Use Zoning

According to the Draft Cork City Plan 2022-2028, the northern portion of our client's lands are zoned as Tier 1 "ZO-02 New Residential Neighbourhood" as shown in yellow Figure 4 below, and 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."

As illustrated in green below, the southern and western portion of our client's lands have been zoned as "ZO 21 City Hinterland", to which the following objective applies:

"Zoning Objective 21: To protect and improve rural amenity and provide for the development of agriculture".



In accordance with National Policy Objective 72(a) of the NPF, the Draft City Plan applies a tiered approach to land management. Tier 1 sites are zoned lands that are currently serviced by physical infrastructure. Tier 2 sites are zoned land that are considered serviceable by physical infrastructure within the life of the Plan.

Zoning Objective 2, which relates to Tier 1 and Tier 2 lands states:

"To provide for new residential development in tandem with the provision of the necessary social and physical infrastructure."

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.

Tier 3 lands are strategic lands necessary for long-term planning of infrastructure, given the ambition growth target set out in the NPF.

Zoning Objective 3, which relates to Tier 3 lands states:

"To provide for new residential development in the long term, in tandem with the provision of the necessary social and physical infrastructure".

Tier 3 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.

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".

3.6 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

We request that the southern portion of our client's lands be zoned as Tier 3 "ZO-03: Residential Neighbourhood" in order to optimize the development potential of this strategic development area.

This section of the submission discusses and provides a rationale for our submission request.

Our client's lands on Spur Hill, Doughcloyne form part of the Strategic Land Reserve (SLR 5), identified in the 2017 Ballincollig Carrigaline Local Area Plan (LAP) as having long-term potential to contribute to compact urban growth within Metropolitan Cork. It is considered that the expansion of the Cork City boundary and the review of the Cork City Development Plan presents an opportunity to re-evaluate the development potential of these lands, which are currently designated as Metropolitan Greenbelt.

4.1.1 Population Growth

A strong population growth for the South Environs will be vital to ensure that the area can effectively function as one of the key suburban areas in Cork and achieve its strategic objectives. The Draft Plan estimates a population increase of 49,581

persons up to 2028 in Tier 1 and Tier 2 lands, and a population increase of 52,250 persons on Tier 3 lands up to 2028.

The significant increase in population in the area in recent years clearly indicates the growing importance of the Southern Environs due to its strategic location and natural extension to Cork City. The South Environs is well suited to the delivery of a mix of housing types at a sustainable density in accordance with the prevailing national and regional planning policy context. It is imperative that the strategic nature of these lands is recognised within the final CPD to enable Cork City to increase the population in accordance with the projected targets.

We consider that if the South Environs, and particularly Spur Hill, is to effectively function as one of the key suburban areas of the City, the Council should extend the Tier 3 "ZO-03: Residential Neighbourhood" zoning to include the subject lands in order to optimize the development potential of this strategic development area.

4.1.2 Optimising Infrastructure Investments

Optimising the return in infrastructural investment is a key principle in the NPF and RSES. It is recognised that there is a need to focus on zoning lands which will support investment in infrastructure, public transport improvements and will be brought forward to the market for development. The delivery of the Cork Metropolitan Area Transport Strategy will require considerable investment, but as highlighted by the RSES will be a 'game changer' for Cork. It is prudent that other infrastructure investments are focused on areas that will benefit for the CMATS investment, therefore clear objectives to prioritise infrastructure investments in line with the CMATS strategy is key to maximise the growth potential of Cork.

This site has the potential to offer multi modal opportunities for accessing local trips generating services, existing and proposed public transport and strategic employment areas. Our client's lands occupy an important strategic position with easy access via Spur Hill. The site has been identified as an area which could provide the Southern Distribution Route (SDR) which will provide multi model transport within the southern environs. The route also has the potential to link the N71 via Spur Hill and provide enhanced connection to Cork Airport as a secondary access point. The SDR will necessitate the upgrade of the existing route and the creation of a new road link between Rochestown and Sarsfield Road, via the Carrigaline Road, Grange Road and Airport Road, and a proposed new link between the N27 and Sarsfield Road with the potential to also link to the N71 via Lehenaghmore and Spur Hill. The road will ultimately provide the basis for the Southern Outer Orbital bus route connecting Rochestown with CIT whilst also enabling interchange with radial bus routes and providing connection to the proposed Light Rail Transit (LRT). Our client's lands would support investment in infrastructure, public transport improvements and should be brought forward to the market for development.

The principles of the NPF and RSES are to promote compact growth within and close to the existing 'footprint' of built-up areas of urban settlements. In line with this principle, future zoning should prioritise areas which consolidate existing and permitted developments. The northern portion our clients' land is zoned and the remaining area to the south would be contiguous and well connected to the existing 'built-up area' of the South Environs. Furthermore, the subject site will

benefit from the planned infrastructure improvements as espoused in CMATS (2020) to further connect the South Environs.

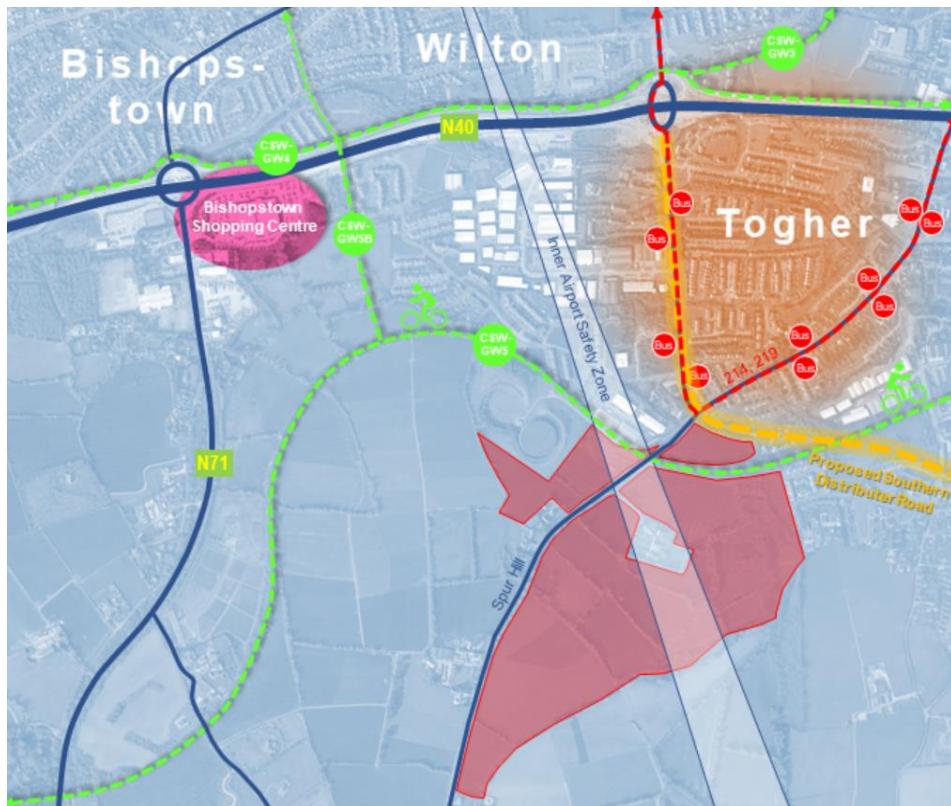


Figure 5: Location of services/facilities in context of site. Site outlined in red.

4.1.3 Connectivity

The area of Togher is already served by good quality and frequent bus services with Bus Eireann being the primary public bus transport provider to the area. As detailed within the recently published CMATS document, these services will be further improved through the planned enhancement of bus connectivity through the provision of the Southern Outer Orbital bus route.

The site itself is located in close proximity to the existing significant residential area to the north of the site, commercial and educational facilities. The lands also have the potential to provide a secondary access to Cork Airport which would provide any future residents to a number of vehicular and pedestrian options to access Cork Airport. The lands have the potential to provide a wide network of footpaths to facilitate connection to the Sarsfield road which connects to the N28 South Ring Road, facilitating accessibility to amenities within the area including Wilton District Centre and promote permeability to the wider area to encourage walking and cycling in the locality.

Additional sustainable travel options such as the Greenway Cycle Network as identified in CMATS, will further enhance and connect the South Environs to the wider Metropolitan area. The amenity walkway/cycleway which runs to the east of the site would create a pathway that feeds into the surrounding residential neighbourhoods to the east of the site.



Figure 6- Existing and Proposed Connections- Site outlined in red.

4.1.4 Prioritise housing and employment development in locations within and contiguous to existing city footprints

Compact growth is a key deliverable of the NPF. To achieve compact growth, RSES seeks to prioritise housing and employment in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling. 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.

National Strategic Outcome 1 (NSO 1) in the National Planning Framework (NPF) sets out a clear objective on compact growth targeting a greater proportion of future housing development to be within and close to the existing 'footprint' of built-up areas.

As illustrated in Figure 7 below, our client's lands have the capacity to accommodate a range of house types which will form a continuation of the existing residential development and deliver an accessible development which prioritises pedestrians and cyclists and established a connection to the existing bus stop on Spur Hill. The development of this site would 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.

The zoning of our client's lands which are contiguous with approved and existing developments would ensure that future growth continues to consolidate the urban footprint of the south environs.





5. Conclusion

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

As demonstrated throughout this submission, 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 and infrastructure.

- We therefore request that the southern portion of our client's lands be zoned as Tier 3 "ZO-03: Residential Neighbourhood" in order to optimize the development potential of this strategic development area.
- Our client's lands occupy an important strategic position within Metropolitan Cork, forming part of the city's suburbs at Spur Hill, Doughcloyne, Togher. Our client welcomes that the northern portion of their landholding continues to be zoned residential "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.
- It is considered that the lands are entirely suitable for development as the site is identified as a Strategic Land Reserve (SLR 5) in the current Ballincollig Carrigaline Local Area Plan 2017.

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.