

Administrative Officer,
Planning Policy Unit,
Cork City Council,
City Hall,
Angleasa Street,
Cork

4th October 2021

RE: SUBMISSION TO THE DRAFT CORK CITY DEVELOPMENT PLAN 2022

Dear Sir / Madam,

We enclose a submission in connection with the Draft Cork City Development Plan.

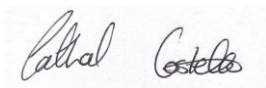
The submission is made on behalf of Cork County GAA Board and relates to the policies and zoning objectives for a site at Kilbarry on the northside of Cork City.

Our clients welcome the opportunity to make a submission to the Draft Plan and would be pleased to meet with the project team should they wish to discuss any of the matters raised.

It is trusted that the submission will be seen as a constructive and productive contribution to the preparation of the final Plan, and, in this regard, we request that it is given favourable consideration.

Please direct all correspondence in this matter to this office.

Yours Sincerely,



Cathal Costello,
Coakley O'Neill Town Planning Ltd.

1.0 EXECUTIVE SUMMARY

- 1.1 The purpose of the submission is to request the rezoning of lands at Kilbarry to a 'Zo 02 New Residential Neighbourhoods objective.
- 1.2 The subject lands are located in Kilbarry approximately 3km north of Cork City Centre and approximately 1km north of the proposed Railway Station at Blackpool.
- 1.3 The lands are located within the development boundary of the city and have existing zoning objectives in relation to Open Space, Residential, Sports and Light Industry and Related Uses development.
- 1.4 This submission relates to areas of the site, which is proposed to be zoned Light Industry and related uses, sports, and public open space. The extent of these zonings, as proposed, does not reflect land ownership boundaries, nor do they reflect the extend of the adjoining business park or the character and nature of the lands themselves.
- 1.5 The consideration of the merits of whether to amend the zoning of the lands should first be undertaken within their wider planning policy context. This context is, in our view, extremely favourable given the strategic national and regional planning objectives for the development of Metropolitan Cork.
- 1.6 It is submitted that the amendments suggested will help realise the early development of the lands for residential uses and thus help meet identified housing targets set out for the city of Cork at national and regional level.
- 1.7 The subject lands have the benefit of a number of key planning and sustainable development attributes that warrant their rezoning for a density of residential development appropriate to their context.
- 1.8 They have access to existing services, including water, wastewater and broadband. They are located close to established community and recreational facilities including sports clubs and schools. They lie adjacent existing employment areas. They have access to road infrastructure. As a result, they have development potential in the short term to secure the delivery of housing units to the market.
- 1.9 On all of these grounds, both strategic and practical, the subject lands represent a strong case for development for residential uses and thus the facilitation of the minor amendments proposed to their zoning.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The subject lands are located in Kilbarry approximately 3km north of Cork City Centre and approximately 1km north of the proposed Railway Station at Blackpool.
- 2.2 The lands are 15.29ha (37.8 acres) in area and are in disuse. They comprise open fields with established boundaries. Their extent and location is illustrated below.

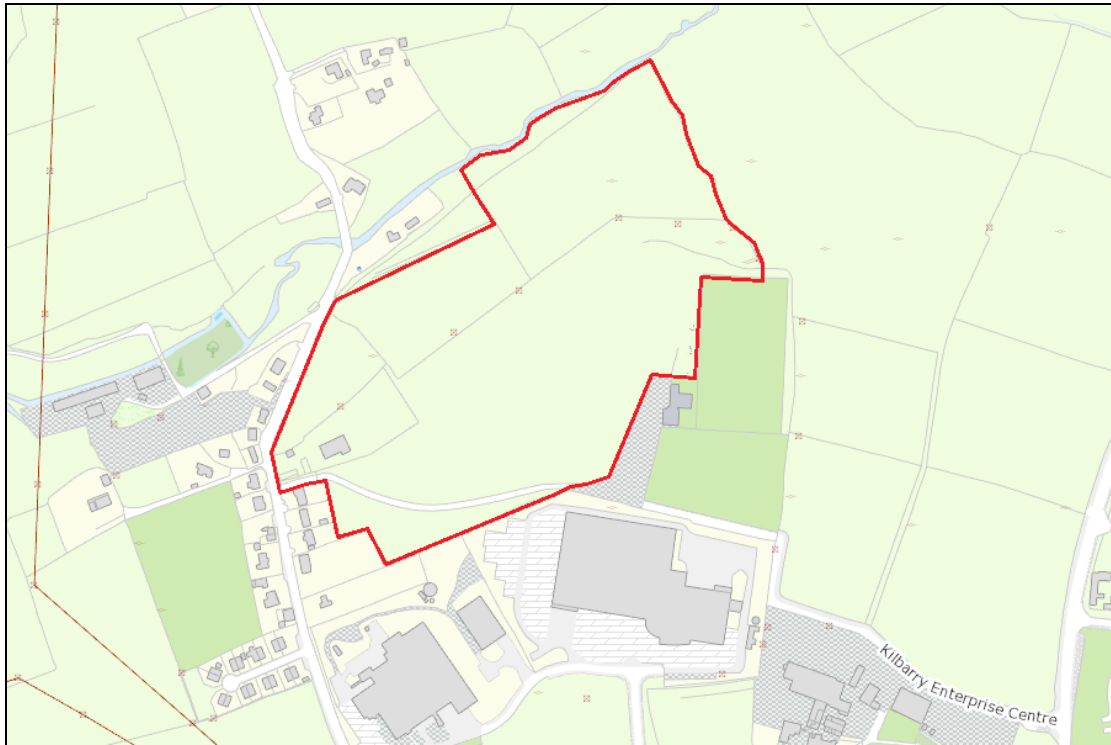


Figure 1: Site Location



Houses at Western Entrance to Site



Site Looking Eastward



Access Roadway at Western End



Site Looking Westward



Western Entrance



Vacant Ciste Na Banban factory

- 2.3 The lands are bounded to their north by the Glenamought River and Valley. Here, the lands slope steeply down to the river and informal walking paths are evident. To the east, the lands are bounded by the Delaney Rovers GAA grounds.
- 2.4 Along their southern boundary runs an old access roadway. To the south, and also to the northeast beyond the GAA grounds, lie the IDA employment lands at Kilbarry. Those lands to the northeast are undeveloped and in agricultural use.
- 2.5 The lands have an existing vehicular access from the Old Whitechurch Road. In this area, and also included within the subject lands, are located two houses fronting onto the road and a vacant factory building and site formerly used for the manufacture of hurleys (Ciste Na Banban Factory).
- 2.6 The southern part of the lands, which are at a higher level, are currently zoned for Residential with the lands to further south of the internal roadway zoned Light Industry and Related Uses.
- 2.7 Outline planning permission was granted for light industrial development and the lands was marketed, without success, for such use in the late 1970s. In 2002 another outline planning application was made (Application Register Reference: S/02/5924), which again sought permission for light industrial units. This application was withdrawn in 2004 prior to a decision being made. There have been no other applications for development on the site since.

3.0 PLANNING POLICIES AND OBJECTIVES

- 3.1 The **National Planning Framework** (NPF) was published in February 2018 and sets out the Government's high-level strategic plan for shaping the future growth and development of Ireland to 2040.
- 3.2 The NPF sets out ambitious population and employment targets for the Country and particularly so for Cork City and its suburbs. Table 4.1 indicates that Cork is to grow by between 50% to 60% by the year 2040, which will result in an additional 105,000 - 125,000 people living in the city and suburbs.
- 3.3 Following on from the publication of the NPF in February, the Southern Region's **Regional Spatial and Economic Strategy** (RSES) which included the **Cork Metropolitan Area Strategic Plan** (MASP) came into effect on 31st January 2020. The Cork MASP outlines the Regional Assembly's vision for the Cork Metropolitan Area.
- 3.4 As per Policy Objective 7 of the MASP, it is a policy to achieve the National Strategic Outcomes outlined in the NPF through sustainable and infrastructure led regeneration and the consolidation and growth of strategic residential, employment and nodal locations along a Cork Suburban Rail Corridor. This objective has direct relevance to the planning of the subject site having regard to the proposed railway station at Kilbarry.
- 3.5 Section 7.3 of the Cork MASP highlights the importance of the North Environs to the strategic residential growth of the city, noting that Kilbarry and the Old Whitechurch Road areas have opportunities for significant residential development providing a northern gateway to the city from the Limerick Road.
- 3.6 While the subject site lies within the administrative boundary of Cork City Council following the city boundary extension in June 2019, the site is still subject to the planning policies contained within the **Cork County Development Plan, 2014** (CDP).
- 3.7 The CDP, as per Objective CS4-1, highlights the important role the development of North Environs must play in the rebalancing of the City in terms of future population and employment growth.
- 3.8 The subject site is located within North Environs in the Cobh Municipal District and is therefore subject to the **Cobh Municipal District Local Area Plan, 2017** (LAP). The LAP establishes that the vision for Cork City North Environs to 2020 is to reinvigorate the northern suburbs of the city as a significant location for future residential development.
- 3.9 Table 3.4.1 of the LAP indicates that 2,281 new housing units are required up to the period 2023. And accounting for dwellings already built, the LAP notes that an additional 2,057 units are required to meet the target population for the period 2017 to 2023.

4.0 DRAFT CORK CITY DEVELOPMENT PLAN 2022

4.1 The Draft Development Plan proposed to continue the current zoning regime for the lands, namely:

- An Open Space to the North along the boundary to the river
- A Residential zoning Centrally
- A Light Industry and Related Uses zoning to the south of the internal Road.
- A small area to the east to be zoned Sports

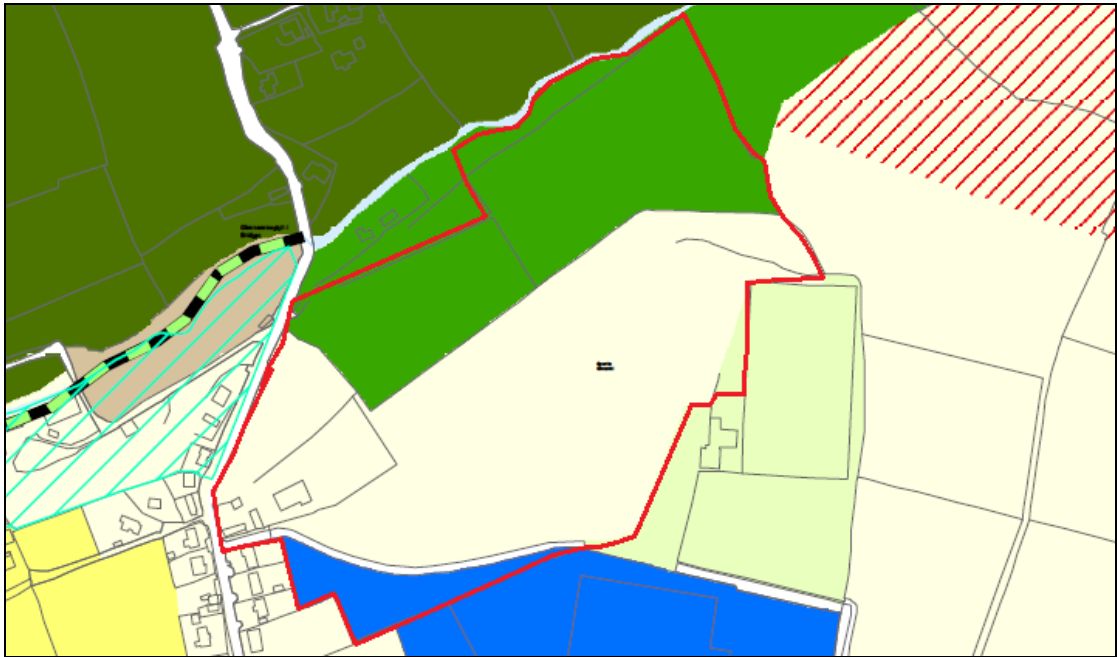


Figure 3: The zoning located on our Clients Site with the submission area outlined in Red.

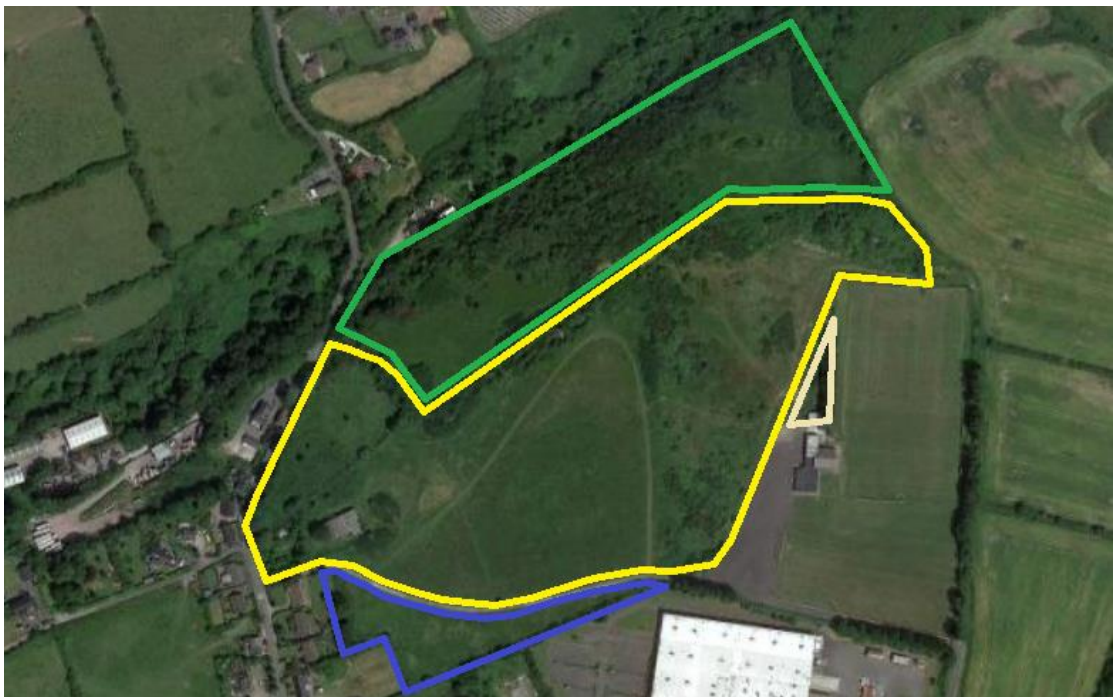


Figure 4: Aerial View with Proposed Zonings Highlighted

4.2 The Draft development plan states the following with relation to the light industrial zoning objective.

Zoning Objective 10: *To provide for light industry and related uses.*

ZO 10.1 *The main purpose of this zoning objective is to provide for and protect dynamic light industry and manufacturing employment areas. Primary uses in this zone where the primary activity is the manufacturing of a physical product and which activity is compatible with being located near to residential areas. Primary uses include light industry; small to medium sized manufacturing and repairs; wholesaling; trade showrooms; retail showrooms where ancillary to manufacturing, fitting and business to business activity; car showrooms; and incubator units. Other uses may include warehousing, logistics, storage and distribution, subject to local considerations. Offices ancillary to the main light industry, manufacturing or employment use are also acceptable.*

ZO 10.2 *Ancillary uses such as childcare facilities and small-scale local services, where they serve the local area, are open for consideration at an appropriate scale where they are subsidiary to the main employment uses and do not conflict with the primary zoning objectives. Pure retailing, retail warehousing, standalone offices and office-based industry will not generally be acceptable in this zone.*

4.3 The Draft Plan states the following in relation to development and zoning boundaries.

Development Close to Zoning Boundaries 12.9

While land use zones are delineated on the Zoning Maps with clear and distinct boundaries, there are interdependencies between land use zones. Development in one zone may impact upon the existing environment in another zone, particularly near boundaries between different zones. In order to avoid abrupt transitions in scale, densities and use, when dealing with development proposals near zoning boundaries, consideration must be given to existing development in adjoining zones. This is particularly relevant for more environmentally sensitive zones such as residential zones, and special consideration must be given to scale, density and use in order to protect existing residential amenities.

5.0 SUBMISSION

- 5.1 Based on the lands character and local context, the case for amending the proposed zonings to properly address their development for new residential development is, in our view, robust. Below we set out a more detailed consideration of the subject lands in their immediate context. This context is illustrated below.



Figure 3: Site within its Local Context

- 5.2 The subject lands have a number of sustainable development attributes that render them suitable for residential development.
- The lands are located within a strategic development area on the northside of the City. The lands are located within a development boundary and do not represent a new extension to a settlement. They are zoned. The proposed change amounts to a more appropriate use of existing zoned land.
 - Their development for residential uses residential will help meet an identified and urgent need for housing.
 - An Bord Pleanála's assessment of a nearby application for over 300 dwellings provides a clear indication of the development management issues involved in the consideration of the subject lands for residential uses. The Board considered that traffic matters could be successfully addressed, that the amenities of existing uses and properties would be protected and that visual amenities were not unduly impacted.

- The subject lands are available for development immediately. All necessary services are available on the public road. They can be easily accessed. The Municipal District Consultation Document confirms that Irish Water services are in place with broadly adequate existing water services capacity.
- The lands are located in close proximity to a public transport corridor and near to the proposed railway station at Kilbarry. They can be developed without significant investment in existing road infrastructure. In relation to traffic, it is notable that the subject lands incorporate a substantial roadside boundary, providing ample flexibility to secure appropriate sightlines.
- There are no natural heritage designations on the subject lands and they are not located on a designated scenic route in the County Development Plan. There are no protected structures on, or immediately adjacent, the site. There are no national monument designations on the subject lands.
- The lands proposed are positioned within a short commute of large employers at Kilbarry and Blackpool and thus present the potential of sustainable commuting patterns.

- 5.3 With regard to the urgent need to progress the supply of housing units, it is clear that Metropolitan Cork, which is acknowledged in policy (and indeed is in reality) as a single housing and jobs market, is not meeting its stated population targets.
- 5.4 In relation to the capacity of the Northern suburbs of the city to deliver necessary housing units in the short term, none of the residentially zoned lands within the North Environs in the 2011 Blarney Local Area Plan have been fully developed. Further, none would appear to have a prospect of being developed in the short term as no applications for development have been forthcoming.
- 5.5 With growing demand and the ongoing failure to secure the timely delivery of housing in appropriate locations within Metropolitan Cork, the capacity for the proper implementation of the Council's core strategy becomes ever more unlikely.
- 5.6 A first step in addressing this could be the identification of sites, within existing settlement development boundaries, where the conditions for the delivery of housing in the short term are evident and to prioritise same for development with appropriate residential zoning objectives.
- 5.7 We submit that the lands the subject of this submission present one such opportunity.
- 5.8 To realise this opportunity our clients have undertaken the preparation of a Strategic Housing Development application to An Bord Pleanála and have already undertaken the necessary consultations with the City Council to advance same.

- 5.9 The Draft site layout being progressed responds to the site's character and location in a more detailed and appropriate manner than the zoning proposed in the Draft Development Plan. As such, it represents a more suitable reflection of the zoning and development objectives which should be put in place. This layout is illustrated below.



Figure 4: Proposed Site Layout

- 5.10 The matters arising with respect to this and the proposed zonings for the site relate to the following:
- The incongruity of the proposed Light Industrial zoning at the southern extent of the lands
 - The inaccuracy of the extent of the proposed sports zoning at the eastern side of the lands
 - The unsuitability of the extent of public open space zoning at the northern side of the lands
- 5.11 To take the proposed light Industrially zoned area first, it is not part of the business park to its south. It is located within our site's legal boundary and on the opposite side of the established field boundary. It cannot be accessed from the business park side.
- 5.12 We submit that its zoning as a light industrial location is therefore inconsistent with the nature and character of the lands.

- 5.13 Further, the small extent of land zoned does not lend itself to the development of a light industrial use of any real prospect of delivering such uses, being as they are often requiring large floorplate building on large sites.
- 5.14 Finally, it is of relevance that the Draft plan proposes, immediately to the east, to rezone an extensive area of existing light industrial land to residential uses. This strongly suggest that there is no requirement or capacity for light industrial zoned lands in the immediate area.
- 5.15 On this basis, we ask the lands are rezoned to an ZO 01 residential zoning objective consistent with the central parts of the lands adjoining.
- 5.16 Secondly, the small area proposed to be zoned for sports use at the eastern side of the site is also within our client's lands and outside the boundary of the adjoining GAA grounds. It is not in use for sports and nor can it be.
- 5.17 This submission requests that this inconsistency is rectified in the final City Development Plan and the site zoned as Z01 – Sustainable Residential Neighbourhood. This will only properly reflect the nature and character of the lands in question.
- 5.18 Finally, in relation to the Public Open Space zoned area that the northern side of the lands, this submission asks that it is reduced by 16m southward to be consistent with the proposed site layout being progressed by our clients in the SHD process.
- 5.19 Such a reduction will have no material impact upon the quality of the public open space achieved at this location, in fact, it will allow for the positioning of residential units overlooking what is proposed as a riverside amenity park. These units will provide surveillance of the proposed amenity park and enhance activity along its boundary.
- 5.20 In this sense, the proposal will enhance the overall attractiveness of the public open space.

6.0 CONCLUSION

- 6.1 Our clients very much welcome the publication of a new Draft Cork City Development Plan and it is hoped that the points raised will be of benefit to the Council in the preparation of same.
- 6.2 The subject lands are located in Kilbarry approximately 3km north of Cork City Centre and approximately 1km north of the proposed Railway Station at Blackpool.
- 6.3 This submission relates to areas of the site, which is proposed to be zoned Light Industry and related uses, sports, and public open space. The extent of these zonings, as proposed, does not reflect land ownership boundaries, nor do they reflect the extend of the adjoining business park or the character and nature of the lands themselves.
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- 6.5 It is submitted that the amendments suggested will help realise the early development of the lands for residential uses and thus help meet identified housing targets set out for the city of Cork at national and regional level.