

Submission to the Pre-Draft Consultation

Submission relating to Strategic Issues for Glanmire, Cork

August 2020



Prepared on behalf of
DCN Developments Ltd.

1. Introduction

This submission to the Cork City Development Plan Pre-Draft Consultation process is prepared by McCutcheon Halley Planning Consultants on behalf of DCN Developments Ltd. In accordance with section 11(2)(b)(c) of the Planning and Development Act 2000, this submission is made in response to public notices inviting submissions from interested parties on the Issues Paper for the new Cork City Development Plan 2022.

The submission will focus on the following strategic issues:

- A strong population growth target for Glanmire to reflect its status as a Metropolitan Town;
- An appropriate allocation of the percentage of residential units to be delivered on infill / brownfield lands, having regard to the City Capacity Study and challenges of bringing such sites / units forward.
- The provision of sufficient headroom in zoned lands to ensure that no shortage in supply arises during the lifetime of the development plan. In support of this principle, to provide for a Strategic Land Reserve to ensure that the longer-term development objectives for Glanmire can be realised.
- Prioritise the zoning of lands within the forthcoming development plan that are deliverable, accessible and consolidate existing and approved development.

This submission is structured as follows:

1. Introduction
2. Location
3. Planning Policy
4. Rationale for Submission Request
 - 4.1. Increased Population Targets for Glanmire;
 - 4.2. Appropriate allocation of units to be delivered on infill / brownfield lands;
 - 4.3. Ensuring there is sufficient a sufficient supply of zoned lands in Glanmire
 - 4.4. Prioritising lands which are readily available for development.
5. Conclusion

2. Location

Glanmire is located c. 9km from Cork City Centre with the settlement running parallel to the M8 Cork to Dublin motorway. Glanmire is comprised of several areas including Glanmire Village, Hazelwood, Riverstown and Sallybrook and is a large residential area located within Metropolitan Cork. The population of Glanmire, as indicated in the Issues Paper is 9,903 persons, making it the second largest of the four new 'Urban Towns' forming part of the expanded city area. Following a boundary extension in May 2019, the entire Glanmire area is now under the administration of Cork City Council.

The area is separated from the old city boundary by a narrow strip of green belt land which has played a strategic role in keeping the city suburbs and Glanmire separate and has helped maintain agricultural/open space land between the two areas. Glanmire was once a collection of small villages but has grown to become an important settlement within Metropolitan Cork and now within the expanded city area.

Glanmire is a local service centre for the town and its wider hinterland with a strong retail presence and significant numbers employed in the service sector. The area is home to a number of Small-Medium Size Enterprises (SMEs) with many located at the Glanmire Business Park, Brooklodge Business Park and Sallybrook Industrial Estate. Its proximity to the large employment areas of Little Island and Carrigtwohill, as well as Cork City Centre, coupled with good connectivity to the wider metropolitan area, makes Glanmire an attractive location in which to reside.

As can be seen from figure 1 below, our clients lands area located in the townland of Sallybrook. The site is served by the R639 which runs through Glanmire. The site is located to the northern end of Glanmire to the east of the R639 and the west of the M8 Cork – Dublin Motorway.

The area surrounding the site is characterised by a mix of uses including residential, retail, industrial and agricultural. The subject site sits between the residential developments known as ‘Glashaboy View’, ‘Glashaboy Woods’ and ‘Crestfield’.



Fig. 1 Location of site at Sallybrook, Glanmire, Cork.

3. Planning Policy

3.1 Project Ireland 2040 - National Planning Framework (NPF)

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 centres 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.

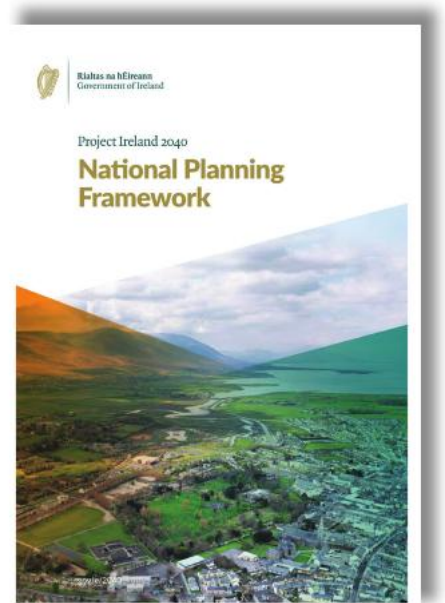
The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. According to the NDP, a key tenet to achieving these ambitious housing targets is through compact growth. This compact growth model focuses on the prioritisation of housing development in locations within and contiguous to existing urban footprints where it can be served by public transport, walking and cycling.

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.



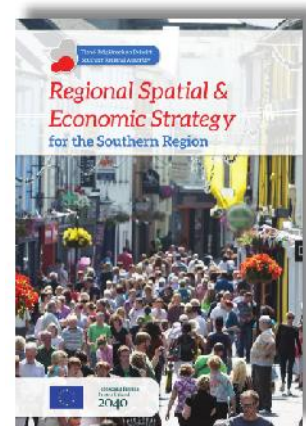
3.2 Regional Spatial & Economic Strategy for the Southern Region (RSES)

RSES is a strategic document, which identifies high-level requirements and policies for the Southern Region, setting out the high-level statutory framework to empower each local authority to develop CCDPs, Local Area Plans (LAPs) and LECPs that are coordinated with regional and national objectives.

RSES describes Glanmire as a:

“main town and key growth centre in Metropolitan Cork set in an attractive, historic, woodland environment in close proximity to City Centre, the railway-line and Little Island Strategic Employment Area.”

It is an objective of the RSES: *‘To strengthen the role of the Cork Metropolitan Area as an international location of scale, a complement to Dublin and a primary driver of economic and population growth in the Southern Region’.*



3.3 Cork County Development Plan 2014

The Cork County Development Plan 2014 identifies Glanmire as being a Metropolitan town. The objective of the Cork County Development Plan 2014 is to:

“CS 4-1: Recognise the importance of the role to be played by Metropolitan Cork in the development of the Cork ‘Gateway’ as a key part of the Atlantic Gateways initiative and, in tandem with the development of Cork City, to promote its development as an integrated planning unit to function as a single market area for homes and jobs where there is equality of access for all, thorough an integrated transport system, to the education and cultural facilities worthy of a modern and vibrant European City.”

The Cork County Development Plan (CDP 2014) establishes a hierarchical network of settlements in the County, allocating related population and housing growth projections. Glanmire is located within the Metropolitan Cork Area and is designated as a ‘Metropolitan Town’ which forms part of the ‘Cork Gateway’ and is located where major population, employment and housing development is encouraged and where the following strategic objective applies:

“Critical population growth, service and employment centres within the Cork “Gateway”, providing high levels of community facilities and amenities with infrastructure capacity high quality and integrated public transport connections should be the location of choice for most people especially those with an urban employment focus.”

Policy CS 4-1 prioritizes certain locations, including Glanmire, to accommodate the planned population growth in the Cork Gateway region:

“n) In the Cork Gateway, development to provide the homes and jobs that are necessary to serve the planned population will be prioritized in the following locations... Glanmire (Dunkettle),...”

The County Development Plan 2014 establishes a population target of 10,585 for Glanmire representing growth of just 1,205 people on Census 2011 figures (8,924). In order to accommodate this level of population growth, it is estimated that an additional 1,320 housing units will be required during the period 2011-2022.

3.4 Cobh Municipal District Local Area Plan 2017

Glanmire is designated as a ‘Main Town’ in the current Cobh Municipal District Local Area Plan (LAP) 2017. The Cobh Municipal District LAP sets out a clear vision for the town of Glanmire as follows:

“Glanmire is one of the key growth centres in Metropolitan Cork. The vision for the Metropolitan area, as set out in the Cork County Development Plan 2014, is to facilitate its development as the main engine of population and employment growth in the South West region. Glanmire will play a significant part in realizing the overall aims for Metropolitan Cork by delivering additional population growth in tandem with incremental retail growth, high quality social and community facilities and improved transport linkages while protecting its attractive woodland setting transport system, to the education and cultural facilities worthy of a modern and vibrant European City.”

The LAP acknowledges that the town has the potential to play a significant future role in the development of Metropolitan Cork, considering its ability to provide a strong supply of housing and business land in close proximity to the City.

The subject lands are located within the settlement boundary of Glanmire as defined by Zoning Map of the 2017 Cobh Municipal District Local Area Plan.

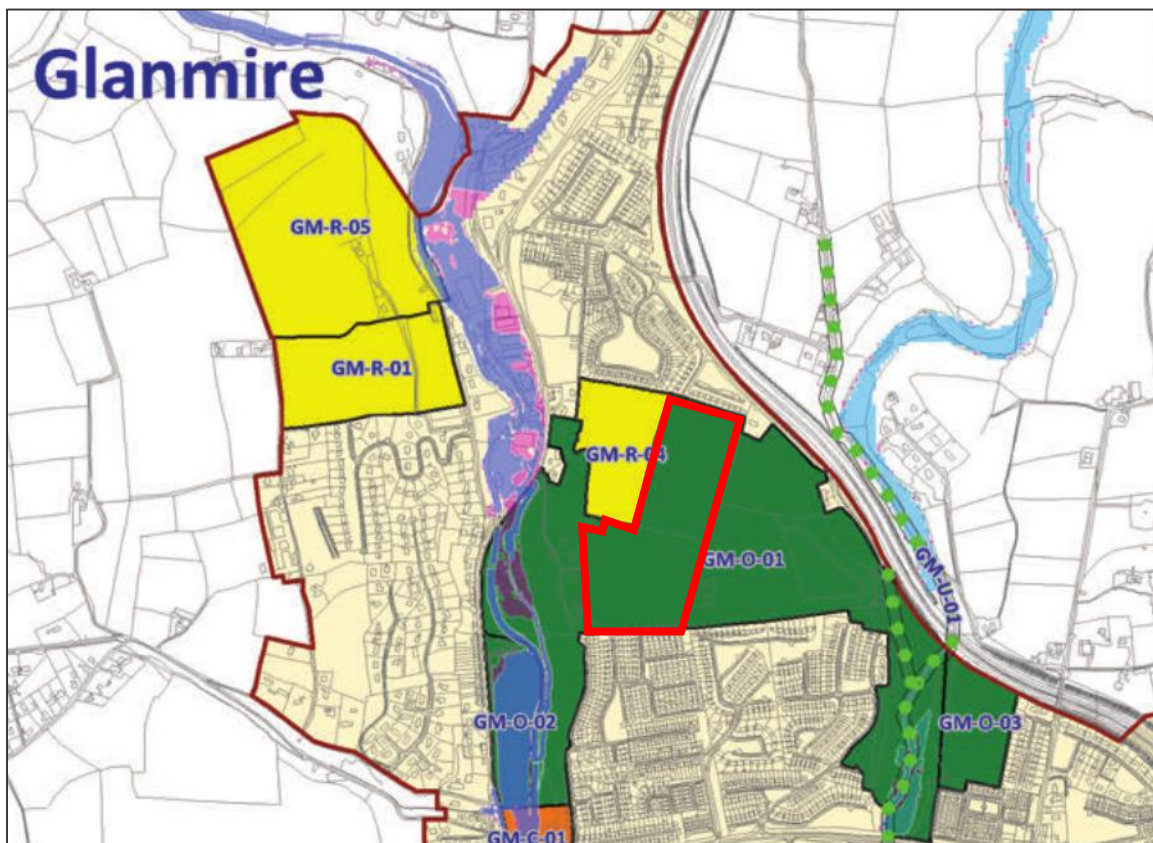


Fig. 2 Extract from Cobh Municipal District local Area Plan.

4. Rationale for Submission Request

This section of the submission discusses and provides a rationale for each of the submission points. Our client has a strategic land holding in Glanmire that is fully serviceable and available for development. Irish Water have confirmed capacity for an additional 150 no. units in this area and the site has access to all relevant infrastructure including a foul and surface water network which has been sized to cater for additional units on this land. The lands also have access to vehicular and pedestrian routes which have again been sized cater for additional units. If Glanmire is to deliver on its strategic function as one of the four 'Urban Town's', driving growth at a sub-regional level, the strategic planning policy context must support viable housing development during the lifetime of the forthcoming Development Plan, on lands such as our clients' land holding.

4.1 Increased Population Targets for Glanmire

Chapter 3 of the Issues Paper focuses on growth within Cork City. The Issues Paper acknowledges that the population of Cork has increased and will continue to increase in the future and poses the following key question:

Should future population growth be allocated in line with recent population trends within the city, or should specific parts of the city be considered for concentrated growth? If so, where?

In the 2014 County Development Plan the core strategy for the County including the town of Glanmire, resulted in a population target of 10,585 by 2022 for Glanmire. At a national level the population growth targets set within the context of the NSS planning framework were not realised, largely due to the economic downturn. Notwithstanding the slower growth rate and constraints relating to infrastructure capacity, Glanmire achieved a higher than average rate of growth when compared to the rest of Cork City and the state, as illustrated in Table 1. During the inter-censal period 2006 to 2011, Glanmire had a growth in population of 6.4%, and between 2011 to 2016 the growth rate was 10.9%. The comparable growth rates for Cork City were -0.2% (2006 to 2011) and 5.3% (2011 to 2016); and for the State they were 8.2% (2006 to 2011) and 3.8% (2011-2016).

	2006 (Source CCDP 2009)	2011 (Source CCDP 2014)	2016 (Census 2016)	Population change 2006-2011	Population change 2011-2016
Glanmire Settlement	8,385	8,924	9,903	6.4%	10.9%
Cork City	119,522	119,230	125,657	-0.2%	5.3%
State	4,239,848	4,588,252	4,761,865	8.2%	3.8%

Continued strong population growth for Glanmire will be vital to ensure that the town can effectively function as one of the four 'Urban Towns' and achieve its strategic objectives. The Issue Paper's Population and Housing Background Document targets a growth of 75,325 people for Cork City by 2031.

We submit that if Glanmire is to effectively function as one of the 'Urban Towns' it should be allocated an adequate portion of the growth allocation in the forthcoming development plan. It is also submitted that, in line with the principles of the NPF and RSES, a smaller portion of population growth should be allocated to hinterland areas than that provided for within previous plans. We submit that a maximum of 10% of growth

should be allocated to hinterland areas. This would also ensure that the Urban Towns such as Glanmire develops to a sufficient scale to grow its role as a significant influence.

4.2 Appropriate allocation of units to be delivered on infill / brownfield lands

The Issues Paper focuses on compact growth within Cork City. The Issues Paper acknowledges that the City of Cork is growing and will continue to do so in the future and poses the following key question:

How do we make our city more compact to avoid undesirable sprawl and increase the delivery of walkable city neighbourhoods and urban towns that are highly accessible by public transport?

How do we make the most of lands that are underutilised and undeveloped in the city centre, city suburbs and the urban towns, while retaining the character and environmental importance of the city's hinterland?

It is a target of the RSES to deliver at least 30% of all new homes within existing footprints shall be “...*evidence based on availability and deliverability of lands within the existing built up footprints.*” This is in line with Cork City Council's aim to make the city more compact and avoid undesirable sprawl.

The Issue's Paper indicates that Cork City Council is currently undertaking a City Capacity Study to help identify parcels of land currently zoned that have development potential. The study will also examine further sites which have development potential but may not benefit from existing zoning. The focus of this study is to investigate the potential for additional housing units within town centres and established built up areas. The study has to date indicated the towns of Ballincollig, Glanmire, Blarney and Tower as having the largest total area of underutilised and undeveloped land.

It would be unrealistic to assume that the full capacity of the sites identified will come forward during the lifetime of the forthcoming development plan. The Issues Paper notes that the delivery timeframe for some sites is difficult to ascertain given the nature of existing uses and other lands require servicing upgrades.

In calculating the zoned land requirement for Glanmire, we submit that the forthcoming development plan should use the baseline that will be established by the City Capacity Study, discounted to take account of constraints to the development of some of the identified sites. In the absence of incentives and initiatives to bring zoned sites forward, we submit that a maximum of 50% of the identified potential capacity should be assumed to be deliverable during the lifetime of the forthcoming development plan. The deliverability of infill / brownfield sites, such as our client's lands, should be kept under review for the duration of the development plan to ensure that no shortage of land supply occurs because of an over-reliance on existing zoned sites.

4.3 Ensuring there is a sufficient supply of zoned lands in Glanmire

Providing sufficient supply of zoned lands in Glanmire will be critical to ensuring that growth targets can be achieved and that land prices do not become artificially inflated, resulting in decreased viability. The NPF Implementation Roadmap suggests that there is no requirement for headroom on zoned lands, as its population projections include an allowance for headroom. However, the Roadmap goes on to state that there is scope for headroom, not exceeding 25% up to 2026, in counties where growth is projected to be at or above the national average baseline, including Cork.

Our client does not agree with the position of the NPF Implementation Roadmap in respect of headroom on zoned lands. There is an inherent need for flexibility in land supply to avoid market constraints. At an absolute minimum there is a need to apply the 25% headroom to the assessment of zoned lands required in Glanmire. In addition, we submit that there is a need to apply a Strategic Land Reserve (SLR) objective to additional lands in Glanmire.

A designation of SLR could be applied to appropriate lands which might be considered suitable as a second phase of zoned lands. Should there be evidence of a shortage in land supply during the lifetime of the development plan (such as lands not being released for development), an objective should be provided to allow planning applications on SLR lands to be considered.

4.4 Prioritising lands which are readily available for development.

The Issues Paper focuses on effectively utilising land within the city. The Issues Paper acknowledges that there are lands readily available for development which are underutilised. Our client's site is one of these key sites. It is a key infill site surrounded by residential developments, it is fully serviceable and readily available for development in the short to medium term. In relation to these sites the Issues Paper poses the following key question:

How do we 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?

Do you think there are specific locations within the city that should be strategically identified for development to achieve balanced sustainable growth? If so, where and how?

Our client recognises that there may be a lesser requirement for zoned lands than currently provided in the 2017 Cobh Municipal District LAP, although as noted above it is critical that a Strategic Land Reserve is available to safeguard the delivery of targeted growth. In prioritising zoning of land, the principles of the NPF and RSES should apply in terms of deliverability, accessibility, and consolidation of the existing built environment.

4.4.1 Deliverability

The deliverability of growth is a key principle of the 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.

As an active housebuilder our client has an excellent record in bringing housing forward to the market and supporting strategic growth targets of Core Strategies. In Glanmire alone, our client is actively developing two developments – 'Glashaboy Woods' and 'Glashaboy View' and is actively pursuing planning on a site along the R639.

Our client remains committed to the delivery of housing in Glanmire in line with strategic growth projections. We submit that in the zoning of lands within the forthcoming development plan, priority should be given to lands, such as our clients land holding at Sallybrook, where there is a demonstrated willingness and capacity to deliver units.

As can be seen from the image below our client's lands have the capacity to accommodate a range of house types which will form a continuation of the 'Glashaboy View' development. These units can be provided in the

short to medium term. Irish Water have confirmed capacity for an additional 150 no. units in this area and the site has access to all relevant infrastructure including vehicular and pedestrian access and waste water and surface water drainage. The development of this site will 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.



Fig. 3 Possible development at Sallybrook, Glanmire.

4.4.2 Accessibility

The accessibility of new development, both in terms of access to services and existing and proposed transport routes should be a key principle in terms of zoning lands for development in the forthcoming development plan. Our client's landholding at Sallybrook benefits from excellent connections in terms of accessibility to the town centre and to existing schools and services in the area This is due to the location of this infill site which is situated between the Glashaboy View and Crestfield residential estates.

As can be seen below the lands have excellent links to the town centre. These connections, including direct footpath connections and pedestrian crossings to the main services within Glanmire, have already been provided. Bus stops are also already in place within close proximity to the lands which facilitate the provision of regular bus services to Cork City centre and beyond It is submitted therefore that the lands are fully serviced and available for development.



Fig. 4 Location of site in close proximity to town services.

It is submitted that in the zoning of lands in the forthcoming development plan, priority should be given to lands, such as our clients landholding at Sallybrook, where there is established accessibility relative to the town centre and amenities.

4.4.3 Consolidation

The principles of the NPF and RSES are to promote compact growth within the existing built up area of urban settlements. In line with this principle, future zoning should prioritise areas which consolidate existing and permitted developments. For example, our clients land holding in the Sallybrook area is contiguous with lands recently developed and approved for development to the north, west and south.

The zoning of lands which are contiguous with recently developed / approved lands, such as our client's landholding at Sallybrook, will ensure that future growth continues to consolidate the urban footprint of Glanmire.

5. Conclusion

On behalf of our clients, we would be grateful if this submission could be given careful consideration during the preparation of the Draft Cork City Council Development Plan 2022-2028.

As set out in detail above, we submit that the forthcoming Cork City Development Plan should consider Glanmire with a higher growth proportion given it is well served by infrastructure in comparison to other Metropolitan towns which are experiencing significant infrastructural holdups which is hindering development within the area.

As has been set out herein, the principles of the NPF and RSES are to promote compact growth within and contiguous to existing urban footprints where it can be served by public transport, walking and cycling. In line with this principle, future zoning should prioritise areas which consolidate existing and permitted developments. Our clients' land holding is contiguous with the built-up area of Glanmire, and benefits from excellent connections with the town core. It is therefore considered that concentrating development to the north of Glanmire should be prioritised to optimise these key infrastructure investments and to promote sustainable transport in the area.

It is respectfully submitted that the forthcoming development plan should prioritise the zoning of land according to the principles of the NPF and RSES with deliverability, accessibility, and the optimisation of existing infrastructure to be key considerations. As detailed above our client's lands, have the potential to deliver development in the short to medium term. Furthermore, our client's lands are eminently suitable to provide lands for residential uses serving as an alternative to one housing within the rural hinterland.

We respectfully request that the planning authority give consideration to the strategic issues raised in this submission and we trust that our submission will be taken into account as part of the consultation process for Issues Paper for the review of the Cork City Council Development Plan. Our clients thank you for the opportunity to engage with the Council in relation to these matters and trusts that due consideration will be given to the issues raised herein.

Please do not hesitate to contact us if you have any queries.

Yours sincerely,



Cora Savage

McCutcheon Halley