

Draft Cork City
Development Plan
Submission

Ballyvolane

Cork

Zoning and Use
Submission

Oct 2021

Submission to Cork City Council by

Longview Estates Ltd
Unit 74, Penrose Wharf, Cork
T23HF51

LONGVIEW ESTATES LTD





Table of Contents

1.0	Introduction.....	3
1.1	What Are We Requesting?.....	4
2.0	Submission Summary.....	7
2.1	Zoning Alterations Proposed - Summary.....	7
2.2	Policy Alterations Proposed - Summary.....	8
2.3	Car Parking Alterations Proposed – Summary	8
2.4	Density Alterations Proposed – Summary.....	9
2.5	Map Corrections.....	10
3.0	Proposed Zonings	12
3.1	Rational For Amending Zonings	12
3.2	The Changes and the Core Strategy.....	16
3.2.1	Rational for Neighbourhood Centre and PCC Zoning.....	24
3.2.1.1	Retail Need	25
3.2.1.2	Primary Care Centre	29
3.2.1.1	Employment Generation	30
3.2.3	Rational for Residential Lands Zoning	31
3.2.3.1	Reallocating Uses within the Land Holding	31
3.2.3.2	Making Corrections to the Draft Plan Residential Zones to reflect Permissions	31
3.2.4	Rational for Open Space / Amenity Lands Zoning	32
4.0	Proposed Policy Alterations.....	34
5.0	Car Parking – A Critical Development Management Standard.....	35
6.0	Density – Housing per Ha,.....	37
7.0	Conclusion	39
Appendix A	Irish Water Correspondence	41
Appendix B	GL Hearn and CSR Planning Reports	48
Appendix C	Consent and Section 47 Lands	49
Appendix D	Topography Plans / Survey	50
Appendix E	School Location Guidance – Wellbeing for Students / Children	54
Appendix F	Correspondence from Dept of Education Re Schools Provision	55



1.0 Introduction

Longview Estates control one major landbank of 200+ acres in the Ballyvolane area.

This is one of the largest, if not the largest contiguous landbank, in a single ownership in the City. It is larger than the Port of Cork's land bank in Tivoli for example¹; 130 acres in Tivoli v. 200+ acres in our contiguous landbank.

With positive engagement from Cork City Council and Cork County Council, planning permission has been obtained from An Bord Pleanála under the SHD process for over 750 homes in April 2020. This consent (and its land bank) ABP Ref TA28.306325, is the largest single permission in the north side of the City and it cornerstones investment in Ballyvolane for Irish Water.

We also provide for access to lands zoned for a primary and secondary school and our consent provides for the initial phase of a Regional Park that is envisaged in the current Cobh Local Area Plan.

Since consent was issued, we have been resolving compliance matters, for agreement with Cork City Council, and advancing the Irish Water Tender for the works that will service the overall Urban Expansion Area. Irish Water are now in receipt of a Tender for the approved drainage works and are to advance construction of same on foot of this and ongoing works by Longview Estates.

We are the keystone development for Irish Water's services for the area with a major Strategic Pumping Station consented as part of our permission; this will be delivered, under a Tender review process that is now complete, by Irish Water. This Pumping Station and Rising Main has been designed to serve 3,200 units with potentially 10,000 in due course with further network extensions and enhancements to serve Blarney and Monard.

Our company has lands currently zoned for Residential Use, Education Use, Business / Employment Use and Amenity (Passive Park Areas). In our planning permission we demonstrated, that by working with the area's topography and other major constraints, such as the 110 kv power corridors and planned road alignments, that the delivery viability of lands in this area can be maintained while also addressing the area's needs.

We respectfully submit that rezoning the lands as we now propose, allows the lands to form the basis of a new focus centre for the community based on the '15 minute' city settlement concept.

This "15 minute City" aim is a provision of the City Plan and the Regional Strategy. The Current Draft Plan zoning does not allow that to occur as it replicates the old "County" zonings. We are proposing a scheme and layout of land uses that allows a range of community facilities and services to be centrally located in "Ballyvolane West" all in a manner that maximises access for pedestrians and cyclists while also being accessible to quality public transport services. To do this however, we submit that some re-zonings are necessary to locate some uses more centrally to the emerging population centres and to reflect the challenges created by the areas baseline topography.

¹ An area with multiple leaseholders unlike our lands



1.1 What Are We Requesting?

Zoning Alterations

- a) We are requesting that the zoning of our land bank is amended to reallocate uses to different locations that are more in keeping with the area's topography (See Map 5 following – Page 20).
- b) The changes will still generally provide for the same amount of lands to be allocated to the same uses within our landbank.
- c) The changes to our land holding will have no impact on Core Strategy objectives.
- d) We are proposing to reduce the residential land take in our landholding and maintain employment areas & job potential.
- e) Our proposed amended zoning will ensure that the land use pattern reflects the 15 minute City concept, placing uses core to serving a community (i.e. school lands, neighbourhood centre, employment lands) in a more central & accessible location to new housing and public transport routes. (See Map 6, Figure 2 and Appendix B). There is a demonstrable need for a new Neighbourhood Centre to serve the emerging housing areas and consents north of Lower Dublin Hill. Much of it is outside the 15 minute catchment of Ballyvolane DC. The Irish Water Drainage Area Plan for the area serves 3200 units. There are currently 1400-1500 units consented or in planning and all of these units are generally located outside the 15 minute walking catchment of Ballyvolane District Centre (which serves a much wider remit). Retail Impact Assessments submitted previously for the permitted Ballyvolane District Centre (Cork City Council Refs 07/32606 & 13/35651) demonstrate massive expenditure leakage which, even at 2013 projections would be more than sufficient to support a Neighbourhood Centre even in the absence of all the new development.
- f) In summary the changes that we are seeking allow for;

Residential Lands (-1.1 Ha)

Business and Employment (-0.22 Ha) – offset by the employment generated by a Primary Care Centre and Neighbourhood Centre which will generate higher employee density per sq. m.

Neighbourhood Centre (+2.6 Ha or -0.2Ha. if offset against reduction in Retail Space in Ballyvolane District Centre); not all this area is deliverable due to 110 kv Power line corridors to the west and soft ground / watercourses to the east.

School Lands (- 1.0 Ha); subject to detail boundary work can be changed to have a zero change – i.e. swap like for like (See Map 5 following)

Public Open Space (-2 Ha) Offset by Improved and extended "Greenway" connectivity and more usable open space as opposed to lands on sloping ground. Also offset by an additional +2.6 Ha of Open Space in the Glen Valley, adjacent to the Fox and



Hounds and +108 Ha in new park lands adjacent to the Barn Restaurant and Lauriston House / Rathcooney².

Policy and Objective Alterations

- g) We also request that changes are made to Objective 10.73 of the Draft Development Plan so as to refine / omit references to Framework Plans for Ballyvolane. Objective 10.73 as written does not reflect the fact that many parts of Ballyvolane do not require a Framework Plan; as consents and infrastructure proposals largely predefine the allocation of uses and future pattern of development. (Refer Section 4.0 – Page 32 of this Submission)
- h) We ask that the proposed Car Parking Standards are relaxed. The standards proposed are challenging for some uses, i.e. convenience retail, and reflect areas that have mature and comprehensive public transport and other modal choice opportunities. We submit that the Council allows itself the “policy” space to either relax standards on a case-by-case basis or refine what is proposed to reflect accessibility and availability of public transport. (Refer Section 6.0) We also request in Section 6.0 that changes are made to food retail sales car parking provisions (to allow car parking on the basis of 1 space per 20 sq.m.) and the designation of Ballyvolane as a Zone 2 area in advance of the provision of Bus Connects. The submission in this respect asks for changes to Tables 4.6 and Sections 11.13 of the Draft Plan.
- i) We ask that the Council allows itself the “policy / decision” flexibility to manage density proposals on a case-by-case basis by having regard to companion measures of density, i.e. the number of Rooms per Ha. as opposed to solely the number of Units per Ha. For example, some schemes may deliver a mix of units that may be desirable in meeting the Council’s *Housing Needs Demand Assessments*. However, they may “fail” density calculations (i.e. be less than 35 Units per Ha) but still provide the same number of rooms that a “compliant” scheme may. (Refer Section 6.0)
- j) Amend Section 11.83 *Draft Cork City Development Plan* to omit the distinction between Duplexes accessed from public and common areas. (Refer Section 2.4 of this submission – Footnote No. 5)

Correct Errors in the Draft Plan

- k) A small portion of residentially zoned lands on our land holding which is zoned for Tier 3 provides for 135 consented homes and apartments. Tier 3 zoning in this respect appears to be an error. These lands should be identified as Tier 1 / 2. (Refer Section 2.5 and Figure 2).
- l) We note that in simple map terms (see Figure 1 following) the *Housing Needs Demands Assessment* has the Ballyvolane UEA area split between the “North East Suburbs” and the “City Hinterland”; simply reflecting historic Electoral Ward boundaries. Our consent (ABP

² Please refer to proposals for the North East Regional Park 10.331 and Section 10.285 which states that “Over the long term, a North East Regional Park is proposed to accommodate the active recreational needs of Glanmire, Ballyvolane and Mayfield residents. This is discussed in more detail under North East Regional Park. In terms of the proposed growth to the south, additional open space (including local and pocket parks) and community sports ground will be required”



Ref TA28.306325) is actually located in the City Hinterland but is functionally part of the North East Suburbs. The Draft City Plan must address this. This can be done by;

- correcting Figure 2.10 of the Plan, or
- confirming that the City Regeneration and Expansion Areas on Figure 2.8 of the Plan to include greenfield areas that have live consents that will see them integrate with existing Neighbourhoods. This can be done by including a footnote to Figure 2.10 stating "**Mayfield (NE) Area 10 and The Glen (NE) Area 12 include areas of new consented housing in the adjoining Hinterland**". (Refer Section 2.5)

m) We ask that the Council, given the legal Section 47 Agreements that it has entered into with us on foot of ABP Ref TA28.306325 and the 750 + homes permitted on our holding, acknowledge and confirm that the Ballyvolane UEA is part of the *North East Suburbs*; the Section 47 spans lands in both areas, the *North East Suburbs* and the *City Hinterland* as currently expressed.



2.0 Submission Summary

The Ballyvolane Urban Expansion Area is a major opportunity for the City to support investment in the northern suburbs of the City.

The area is currently a focus for new investment and homes provision due to its close proximity to the City Centre.

However, all housing development must be balanced and supported by a range of uses including education, employment and services such as retail and healthcare. We have the capacity to do this on our land bank in a manner that provides for integration in delivery of services.

The following submission will ask for a number of changes to the Draft Development Plan with respect to the Ballyvolane Expansion Area. The changes are generally minor in nature and seek to amend the zonings on site, so that they can be realistically delivered, while keeping the same quantum of zoned lands.

We shall provide evidence for the changes in Section 3 onwards but will set them out in summary in the following section.

2.1 Zoning Alterations Proposed - Summary

We ask that the zonings that apply to the area are changed to enable a better balance in the mix and distribution of uses so as to reflect the need for the *15 minute City Concept*; this will be illustrated on a Map 6 which is included later in this submission.

The current Draft City Plan zonings generally replicate the previous Cork County Council LAP (which did not adequately address the 15 minute concept, topography or other critical constraints to delivery, i.e. 110kv lines). While some changes have been made, there are now large consents, active proposals and Irish Water Services and commitments that will ensure the delivery of 3000 + units; perhaps more, depending on density.

Such development will address the population targets of the Council for the North East Suburbs and provide Irish Water infrastructure to serve Monard and Blarney in due course.

We can play an important part in delivery, for example;

1. We own 200+ acres of land in Ballyvolane; there are no challenges with fragmentation or negotiation.
2. We have Section 47 agreements with Cork City Council, where we have mutually agreed certain matters on land and services delivery.
3. We have agreed compliance proposals and are transferring lands to IW for the delivery of critical infrastructure. The successful delivery of our lands actually underpins the delivery of services for Blarney and Monard.
4. Our land directly provides for a planning permission obtained from An Bord Pleanála, under the SHD process, for over 750 units in April 2020.



5. We have Neighbourhood Centre Retailers and Primary Care Centre providers who are willing and able to deliver on our lands (in line with the suggested zoning plans that we are presenting) and these uses are also supported by IW (Appendix A).

Providing for these ancillary uses is important.

2.2 Policy Alterations Proposed - Summary

There are currently 1500+ housing units either consented or active in the planning process.

While we acknowledge and support the Council's intent to deliver Active Land Management though Framework Plans, the current consents and Section 47 agreements with Cork City Council, for this company and third parties, largely define the framework of uses in the area.

In this respect, we submit that Framework Plans, as proposed in **Objective 10.73** of the Draft Plan, for Ballyvolane (in particular in the vicinity of Ballyhooley Rd) are not immediately necessary. We will suggest minor changes to the Draft Development Plan text in this respect in Section 3.2 following.

2.3 Car Parking Alterations Proposed – Summary

We have concerns that the Council's proposed car parking standards will stymie commercial development for services, offices and other employment generators.

The Draft Car Parking standards, while proposed to be subject to review, represent a very strict standard if applied without any safeguards in the event of public transport enhancements not occurring. If development, employment and residential development stops, it is hard to restart it given the mobile nature of capital.

The standards that are proposed are in many instances stricter and harder to achieve than figures in London, Dublin or even Cork's direct regional competitors for investment, Limerick and Waterford. What is the strategic intent of such figures? Is it to drive modal shift, address climate change? We ask that this is considered further. Appendix B provides additional insight on car parking.

If stricter car parking is to be achieved we submit that it is important that the Plan allows the City to move gradually to the ambitious standards that are sought and to allow for measures that allow for flexibility on density and car parking in particular.

The standards are for example, stricter than what is being delivered in London for example for food retail, a City with higher density and very effective and mature public transport (see Appendix B). In all urban areas, there are certain retail activities that will always tend towards vehicular transport, i.e. food retailing is almost exclusively catered for via the private car or taxi for central City located food retailers (Dunnes Stores and Tesco in Cork City Centre). Busses are not generally the modal choice for food retailing. In such cases, we submit that more relaxed standards should apply to food shopping and neighbourhood centres.

In summary, the car parking standards proposed are:

1. Stricter than our immediate competitors (Limerick / Waterford),
2. Stricter or comparable to the Dublin Local Authorities (who have better public transport and more modal shift); and



3. Stricter than London (an area with very mature public transport) for food retail.

Safeguards have to be applied so that car parking standards do not stymie delivery of necessary uses. The standards also have to be changed and to allow for flexibility in the application of such strict standard; particularly for food retail.

An option is to use *Accessibility Matrices*, such as in the UK, where more relaxed parking standards are used in areas with less public transport. Using such an approach would provide flexibility and address the real challenge of providing for modal shift through Bus Connects as it is delivered over time.

If Bus Connects is delayed, or the routes are not where anticipated, how then do you reconcile demanding parking standards with no Public Transport?

We submit that it is more appropriate to progressively move to strict standards rather than seek to impose them day one.

2.4 Density Alterations Proposed – Summary

Section 3.24 of the Draft City Plan states that “*as a general rule the minimum density shall be 35 dwellings per hectare (nett density)*”.

This 35 units per ha. figure is obviously derived from the *Sustainable Residential Development in Urban Areas* which in turn evolved from the *Residential Density Guidelines 1999*. While delivering housing at this density is possible, the National Standard is simply derived from UK guidance. The basic 35 units per ha standard is too blunt and while there is flexibility in the national guidance to go lower, we submit that the Council should allow for flexibility in planning decisions surrounding housing delivery by including the density matrix from the *Urban Design Compendium Homes and Communities Agency UK*; this simply acknowledges alternative calculations of density.

Irish Guidance is influenced by UK guidance³ which delves further into the discussion of density by also looking at Habitable rooms Per Hectare. Table 1 is a Density Matrix extracted from the “*Urban Design Compendium Homes and Communities Agency UK*”. Put in simple terms,

- Ireland has used UK density guidance for a Per Ha figure.
- The UK uses design standards that allow more smaller units per Ha; i.e. smaller rooms, less storage, smaller gardens and plots gives more units per Ha using conventional, less expensive (more viable) building solutions.
- Irish design guidance does not allow for “small houses” such as in the UK but still seeks to use the UK 35 Per Ha standard. This drives building types such as apartments and duplexes that are difficult to deliver in a viable manner – a matter compounded in Cork City alone (*11.83 Draft Cork City Development Plan*)⁴ now by the decision to call a duplex served off a public street a house but one served off a private common area an apartment – this approach

³ For example Urban Design Compendium Homes and Communities Agency UK 2000

⁴ We submit that this should be changed to delete the following marked text “*Duplexes are defined as homes over two-storeys that are not houses (duplexes can also be called maisonettes, double-lowers / uppers). A triplex is a home over three storeys. Where duplexes front onto a street directly and have own door access onto the street they are defined as a duplex house and will have living accommodation over them. Where they are accessed from common areas they will be defined as apartments.*”

changes the split of apartments to houses in a scheme or drives the arbitrary introduction of common areas.

Using the 35 Per Ha standard without reference to the flexibility that is allowed by the *Urban Design Compendium Homes and Communities Agency UK* will lead to constrained housing supply as delivery focusses on density criteria that are difficult to make viable in all locations.

To have regard to rooms per Ha as a tool in the decision making process reflects a more nuanced approach to density than the raw calculation of housing density as a function of units per Ha.

The area of Density is more fully considered in Section 6.0 of this submission.

Table 1: Extract from *Urban Design Compendium Homes and Communities Agency UK*

		Option 1	Option 2	Option 3
Car Parking Provision		High 2-5 spaces per unit	Moderate 1.5-1 space per unit	Low less than 1 space per unit
Redominant Housing Type		Detached & linked houses	Terraced houses & flats	Mostly flats
Location	Setting			
Sites within Town Centre 'Ped-Shed'	Central			
			240-1100 hr / ha 240-435 u / ha	
			Ave. 2.7 hr / u	
	Urban		200-450 hr / ha 55-175 u / ha	450-700 hr / ha 105-275 u / ha
			Ave. 3.1 hr / u	Ave. 2.7 hr / u
			240-250 hr / ha 35-60 u / ha	250-350 hr / ha 80-120 u / ha
Sites along Transport Corridors & Sites close to a Town Centre 'Ped-Shed'	Urban		Ave. 4.2 hr / u	Ave. 3.0 hr / u
			200-300 hr / ha 50-110 u / ha	300-450 hr / ha 100-150 u / ha
	Suburban	150-200 hr / ha 30-50 u / ha	Ave. 3.7 hr / u	Ave. 3.0 hr / u
			200-250 hr / ha 50-80 u / ha	
Currently Remote Sites	Suburban	Ave. 4.6 hr / u	Ave. 3.8 hr / u	
		150-200 hr / ha 30-65 u / ha		
		Ave. 4.4 hr / u		

Table 3.3 Density matrix

Average densities are based on case studies analysed as part of the *Sustainable Residential Quality: Exploring the housing potential of large sites* research (LPAC, DETR, GOI, LT and HC, 2000)

2.5 Map Corrections

There are a number Map Corrections that must be addressed or acknowledged.

Item 1

We will, in due course, refer to a mapping error in the Draft Plan that has part of our serviced, consented land bank zoned as Tier 3. This Tier 3 area is where 130 houses and apartments have been permitted. This Tier 3 must be corrected so that they are Tier 1 – 2 as the lands have a permission, are consented and have an IW services plan and are part of a Section 47 agreement with Cork City Council. **It is illogical to have a permitted consent as Tier 3**; please refer to Section 3.2.3.2 following.

Item 2

We note that in simple map terms (see Figure 1 following) the *Housing Needs Demands Assessment* has the area split between the “North East Suburbs” and the “City Hinterland”; simply reflecting historic Electoral Ward boundaries. **Our consent⁵ is actually located in the City Hinterland but is functionally part of the North East Suburbs. The Draft City Plan must address this.**

We ask that the Council, given the legal Section 47 Agreements (Appendix C) that it has entered into with us on foot of ABP Ref TA28.306325 and the 750 + homes permitted in the area, acknowledge and confirm that the Ballyvolane UEA is part of the *North East Suburbs*; the Section 47 spans lands in both areas, the *North East Suburbs* and the *City Hinterland* as currently expressed. This can be done by;

- correcting Figure 2.10 or
- confirming that the City Regeneration and Expansion Areas on Figure 2.8 include greenfield areas that have live consents that will see them integrate with existing Neighbourhoods. This can be done by including a footnote to Figure 2.10 stating **“Mayfield (NE) Area 10 and The Glen (NE) Area 12 include areas of new consented housing in the adjoining Hinterland”.**

The current Draft Plan has the housing areas that are part of a live consent arbitrarily outside of the natural development area due to the boundary line for the Local Ward. This addresses historic boundaries rather than the future and current legal status of the lands. **This must be corrected / addressed.**

Figure 1: DED Boundary Map overlayed on current LAP Zoning and Permitted Consent



⁵ ABP Ref TA28.306325



3.0 Proposed Zonings

Map 1, following, shows the general arrangement of the permitted scheme (ex some compliance alterations which have been approved by the City Council). That consent (ABP Ref TA28.306325) was designed so as to be compliant with zoning. However, it was compromised in doing so as the zoning did not reflect topography or other major constraints in the area, i.e. power lines.

In summary, Cork County Council's zonings, which the City inherited, were framed without reference to detailed topography. We have that information now, it was provided with ABP Ref TA28.306325 and is also included as Appendix D.

We are proposing zoning changes that seek to address these constraints and place community uses at the centre of what is a 15 minute city concept in Ballyvolane. The changes proposed (see Section 3.5 following) make no significant material changes to the quantum of zoned lands but instead represent a more deliverable arrangement having regard to permitted consents, infrastructure and topography.

3.1 Rational For Amending Zonings

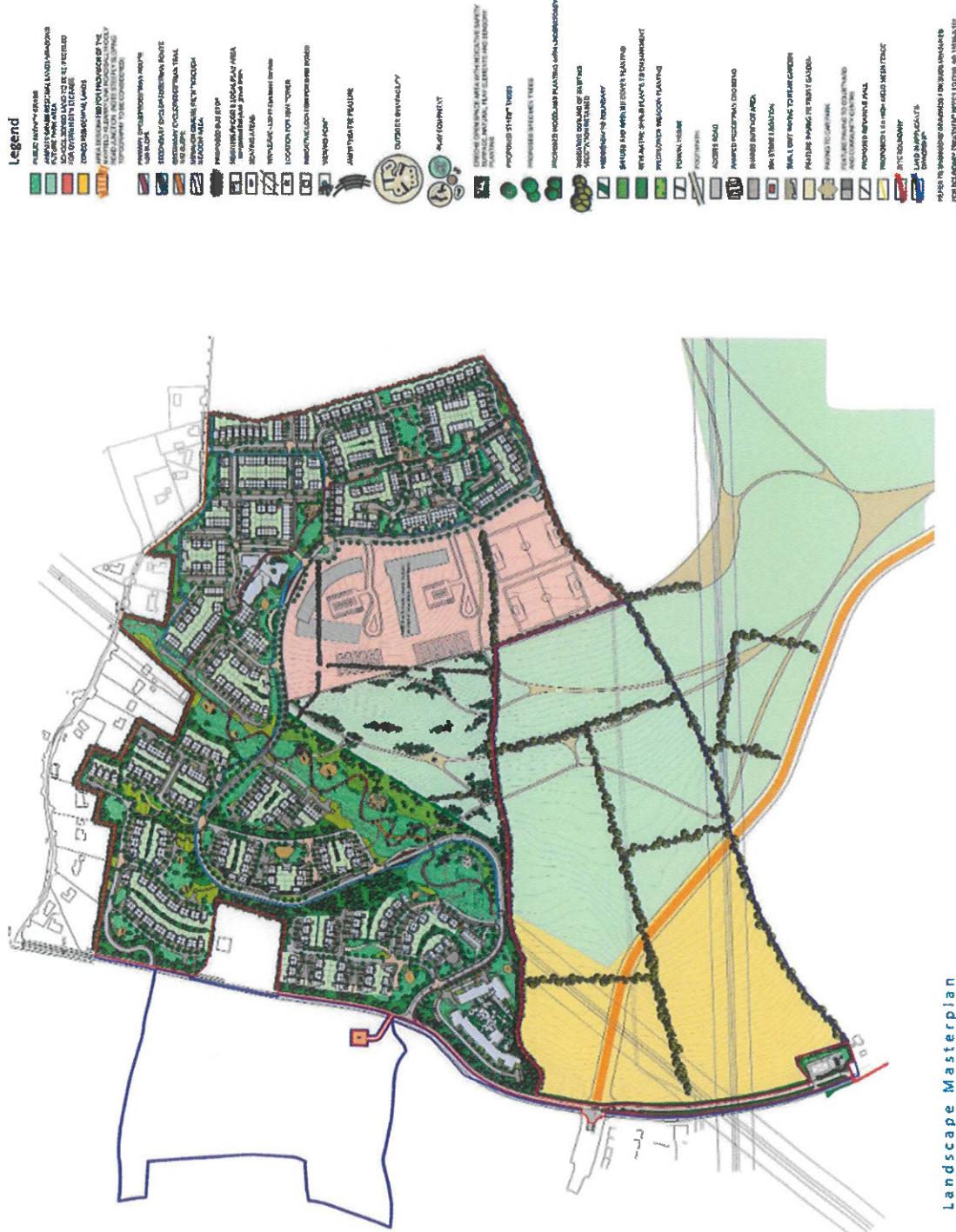
1. At present the area will accommodate thousands of new homes and these need new services and amenities in central locations that are walkable and within cycling distance.
2. There are no notable retail facilities within easy access of the consented and emerging areas. The area needs a new neighbourhood centre supporting the 15 minute city concept.
3. The school lands are currently located at a high point in the area at a distance from existing and new housing. Children and cars will travel some distance, uphill to access the school.
4. We want to address all these issues in a simple manner that reflects our landholding and detailed knowledge of the area. Topography has to be respected.

To assist in understanding the proposed zoning changes, we commissioned a model that shows;

- The topography of the area and our Permitted Consent (Figure 2 following).
- The general reprofiling of the topography to create more viable delivery parcels (see Figure 3 following).
- An alternative alignment of the Inner Northern Distributor Road as it crosses our site (Figure 2 and 3 following); the Autocad files for this have been previously shared with the Infrastructure Dept. of Cork City Council to assist them in their work on the Inner Northern Distributor Road. This alignment creates substantially less cut than the alignment currently on the Draft Plan – approx. 60k m3 v. 300k m3 of excavation and is identified here to assist the Council in their forthcoming discussions and consultations on the route.



Map 1 General Arrangement of Permitted Consent ABP Ref TA28.306325



- Figure 3 shows the revised levels / profiles that can be achieved on the residual lands in our ownership. It also shows a potential alignment for the Inner Northern Distributor Road. These residual lands can allow for the delivery of viable development parcels. With respect to the Inner Northern Distributor Road, whether the road takes a northerly or southern alignment, as it traverses out lands on the way to Banduff Road, it can still accommodate the zoning proposals that we are suggesting.

Figure 2: Existing Permission



Figure 3: Permission with Partial Alternate Inner Northern Relief Route

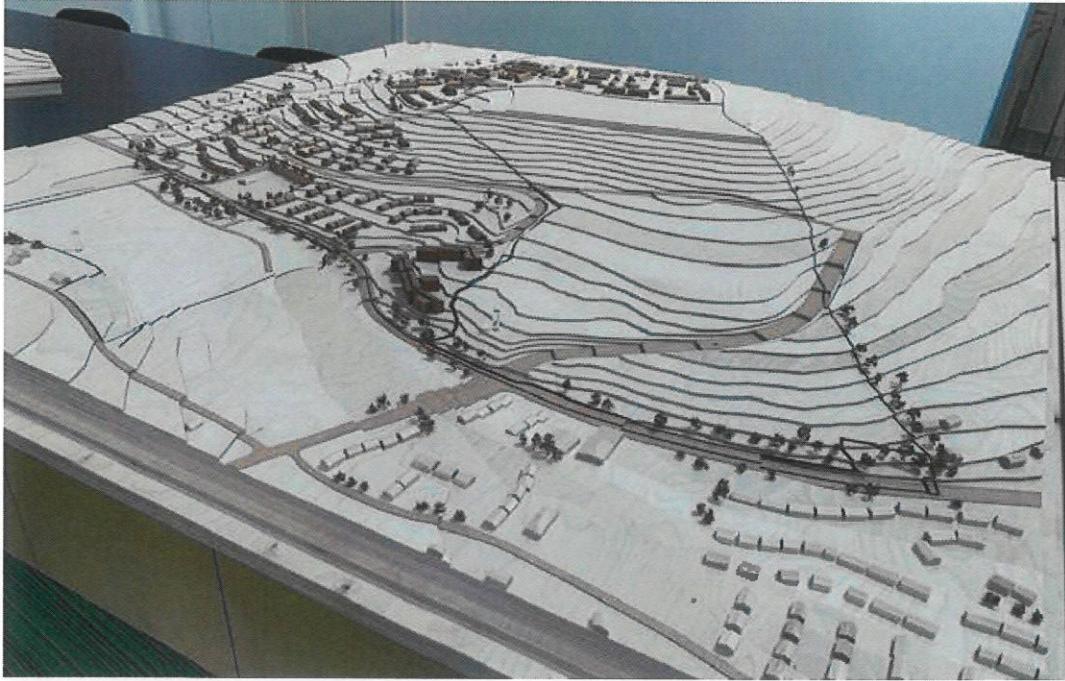
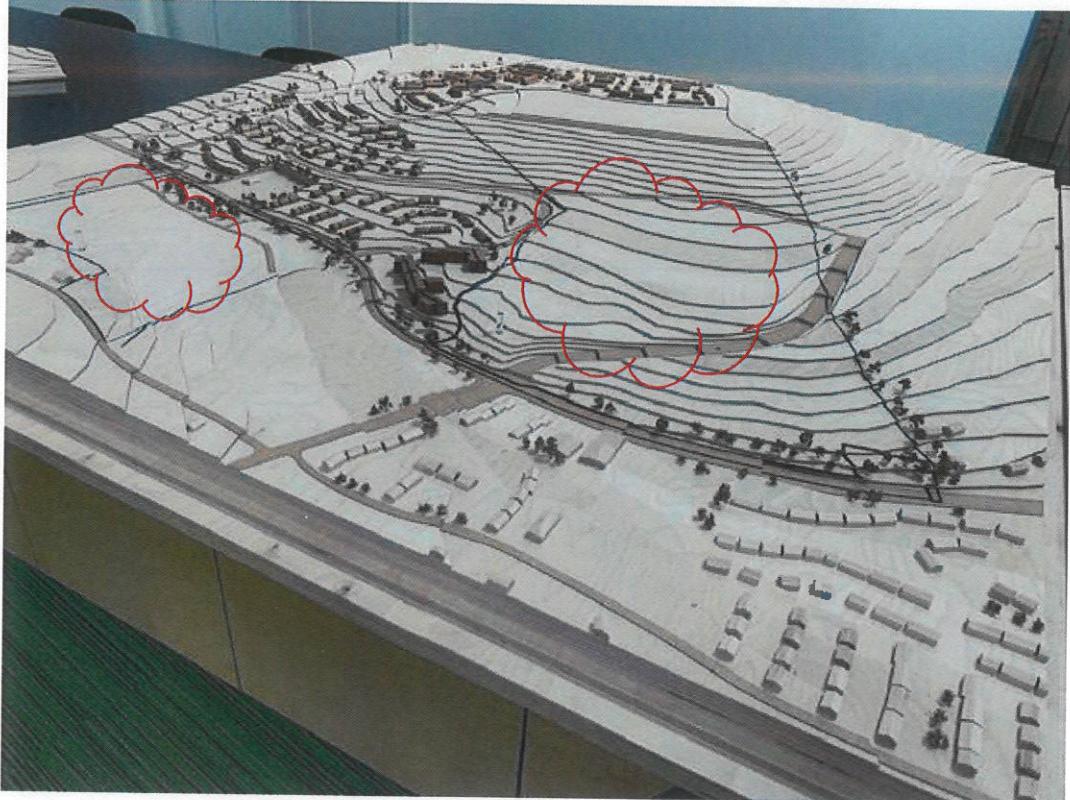


Figure 4: Areas of Potential Reprofiling





3.2 The Changes and the Core Strategy

Our proposal, apart from some minor corrections to Tier 1 / 2 & Tier 3 designations on our land involves placing uses that are important to building communities at the centre of all development lands – Cork County Council's historic plans did not do this, neither did they reflect the 15 minute City Concept.

To apply this 15 Minute City concept the "old zonings" cannot simply be replicated.

Permitted development, and proposed zonings, are included on following Plans which illustrate our current permission (that Cork City Council has entered into a Section 47 agreement on (with us)).

In our proposed zoning changes, a key issue in our view is to justify the changes / relocation and alteration in the zones, by making the changes as "neutral" as possible from a regulatory viewpoint. In total, we do not propose to alter the overall quantum of zoned lands in our land holding. The changes proposed, essentially repackage the area land uses to reflect;

1. Topography.
2. The permitted consents.
3. Future Infrastructure provisions (such as distributor roads, cycleways and bus corridors) – which essentially absorb zoned lands.

In broad terms the approx. proposed changes are as follows:

<u>Residential Lands</u>	(-1.1 Ha)
<u>Business and Employment</u>	(-0.22 Ha) – offset by the employment generated by a Primary Care Centre and Neighbourhood Centre which will generate higher employee density per sq. m.
<u>Neighbourhood Centre</u>	(+2.6 Ha or -0.2Ha. if offset against reduction in Retail Space in Ballyvolane District Centre); not all this area is deliverable due to 110 kv Power line corridors to the west and soft ground / watercourses to the east.
<u>School Lands</u>	(- 1.0 Ha); subject to detail boundary work can be changed to have a zero change – i.e. swap like for like (See Map 5 following)
<u>Public Open Space</u>	(-2 Ha) Offset by Improved and extended "Greenway" connectivity and more usable open space as opposed to lands on sloping ground. <u>Also offset by an additional +2.6 Ha of Open Space in the Glen Valley, adjacent to the Fox and Hounds and +108 Ha in new park lands adjacent to the Barn Restaurant and Lauriston House / Rathcooney</u> ⁶ .

⁶ Please refer to proposals for the North East Regional Park 10.331 and Section 10.285 which states that "Over the long term, a North East Regional Park is proposed to accommodate the active recreational needs of Glanmire, Ballyvolane and Mayfield residents. This is discussed in more detail under North East Regional Park. In terms of the proposed growth to the south, additional open space (including local and pocket parks) and community sports ground will be required"



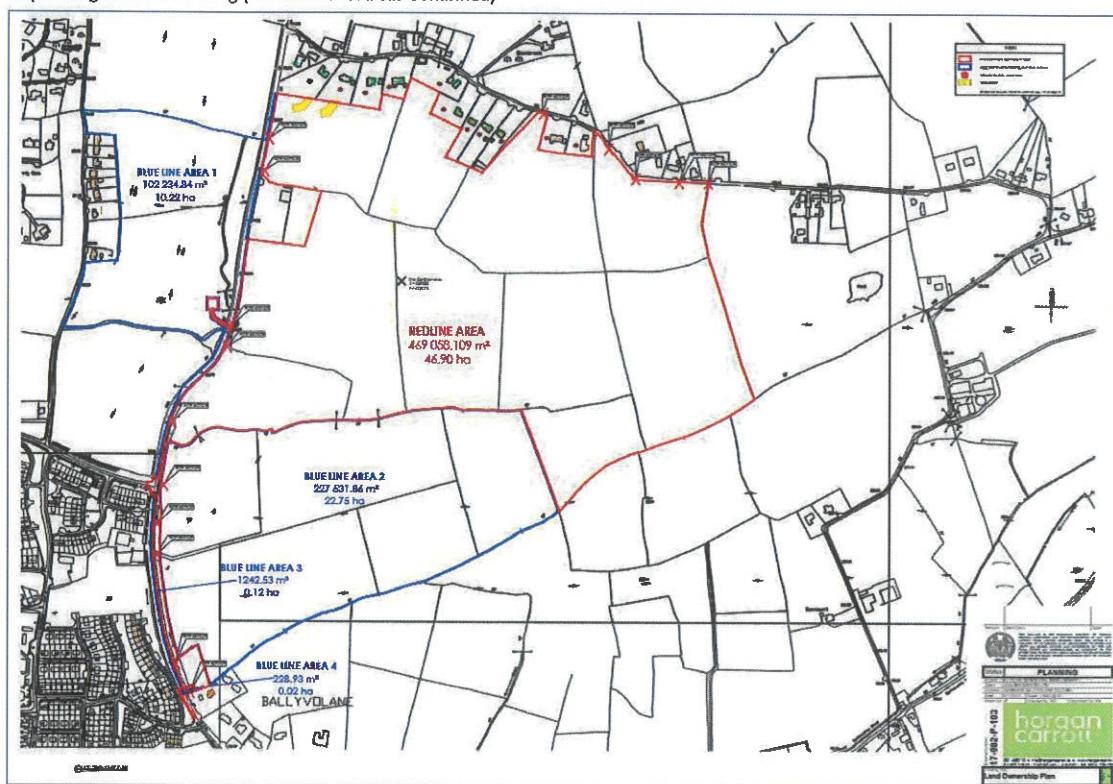
These changes are illustrated in the following Maps

- Map 1 Longview Landholding
- Map 2 Existing Zoning
- Map 3 Proposed Zoning
- Map 4 Changes
- Map 5 Schools Indicative Layout

Supporting details on schools, Neighbourhood Centres and Primary Care Centres are provided on pages following the maps.

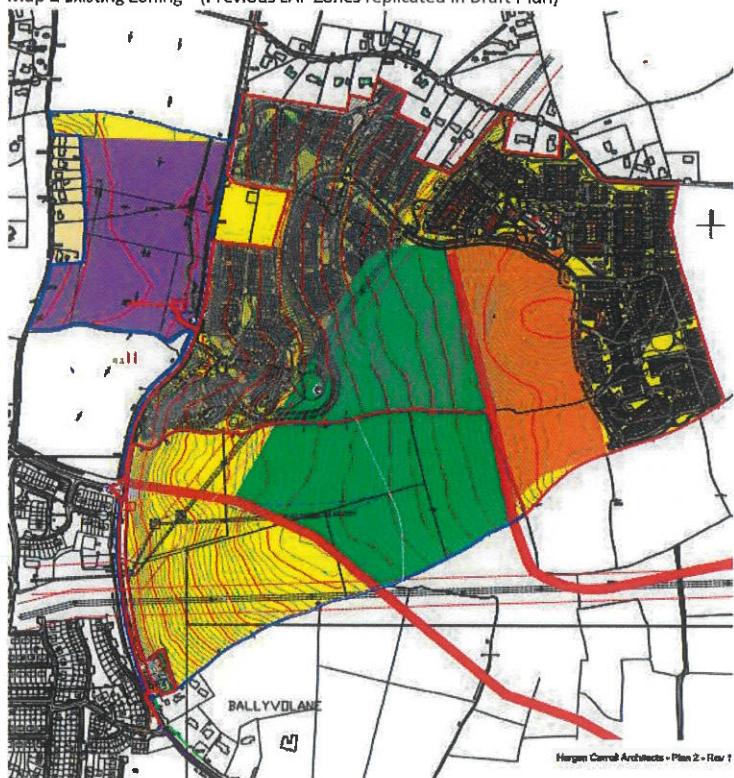


Map 1 Longview Landholding (Red and Blue Areas Combined)





Map 2 Existing Zoning (Previous LAP Zones replicated in Draft Plan)



Problems with Proposed Draft Plan Zones

(Note. The Draft City Plan replicates the Previous Zones but leaves out the Distributor Road Network (in thick red lines) that the County Council used to define boundaries between zones. Some lands are identified as Tier 3.

Image opposite shows the original LAP Zones (Cork County Council) with the permitted Longview consent super-imposed on the zoned areas.

Original zones did not reflect in an ideal manner the topography or challenges in delivering the mix of use proposed.

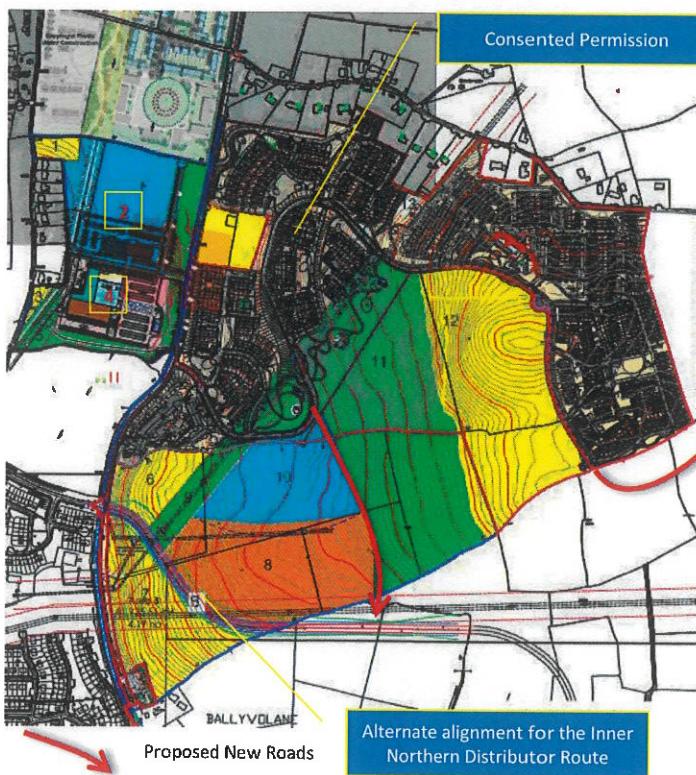
The school lands for example are located at the top of a hill with a 70 m level change from the Ballyhooley Rd to the School area.

This school area would also have challenging pedestrian and vehicular linkages to the lands to the south with approx. 2000 pupils going up and down hill by car or foot. Better logic therefore to locate the school centrally in the southern area of our landholding.

Limited provision of employment spaces in central locations and similarly with neighbourhood uses and ancillary support uses.



Map 3 Proposed Zoning- What we are requesting for inclusion on the City Plan Map



Area 1 = Remains Residential / Potential infill or sheltered housing type use; 3538.26m²

Area 2 = Remains Business and Employment with Primary Care Centre Objective; 47,936.63m². Western area compromised by 110kv corridor. Potential for Greenway connection to lands to north as lands compromised by 110kv corridor.

Area 3 = Changes to Residential; 1,079m².

Area 4 = Neighbourhood Centre. Anchor and ancillary retail / storage / distribution; 26,294m². Western area compromised by 110kv corridor.

Area 5 = Changes to Open Space; 20,376m²

Area 6 = Remains Residential – 14,450m²

Area 7 = Remains Residential (but about 15% compromised by 110kv lines) – 39,797m²

Area 8 = School Lands (Primary and Secondary School) – 60,450m² (Naturally larger depending on final alignment of Mayfield Kilbarry Link Rd – i.e. whether it goes north or south of the school)

Area 9 = Greenway extension to Park lands set up by Longview consent with option to extend further as it follows 110kv corridor – 10863.18m².

Area 10 = New Business and Employment Area centrally located and to offset change by Neighbourhood Centre Area 4 – 35,058m²

Area 11 = Passive Amenity Area - 134178.93m²

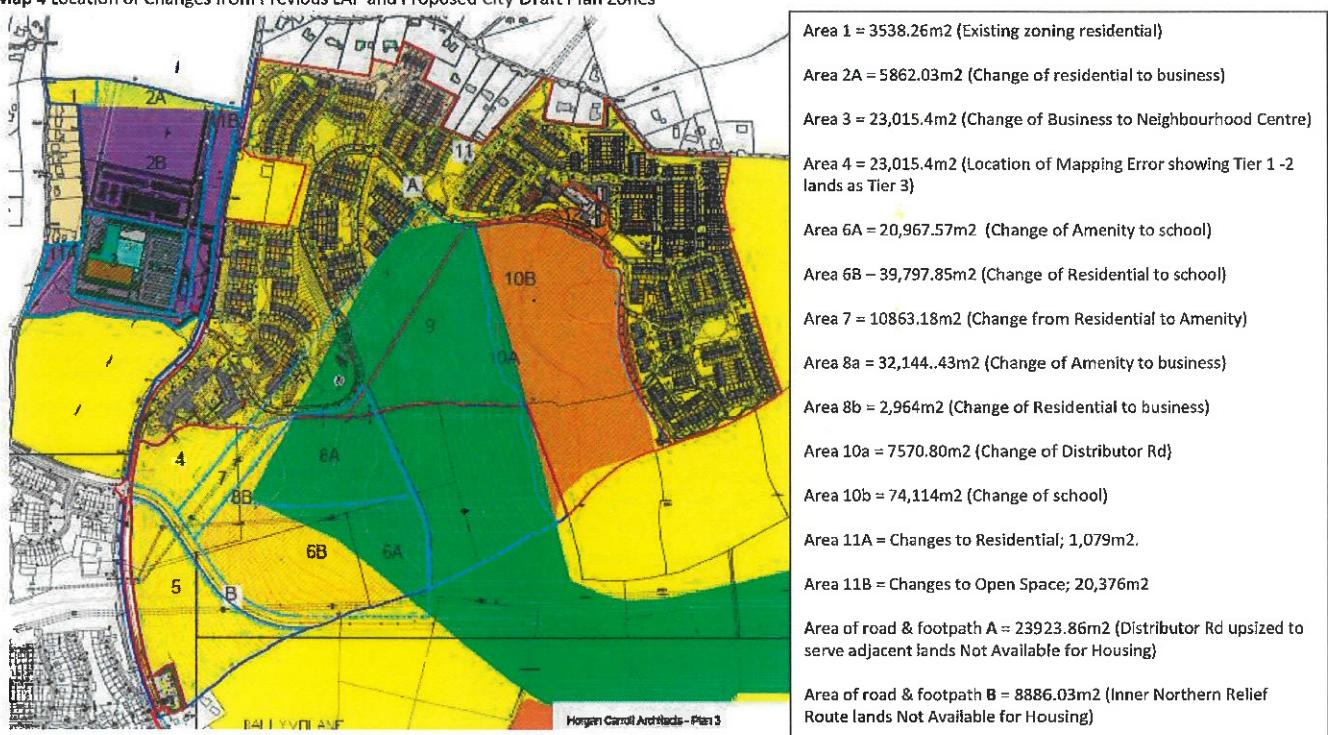
Area 12 = Residential Lands lost elsewhere reallocated to former School site - 85882.63m²

Area 13 = Permitted Housing, Creche, Community Space, GP / Local Shop - 305740.19m² (Includes Distributor Road)

Area of road & footpath A = 23923.86m² (Distributor Rd upsized to serve adjacent lands Not Available for Housing)

Area of road & footpath B = 8886.03m² (Inner Northern Relief Route lands Not Available for Housing)

Map 4 Location of Changes from Previous LAP and Proposed City Draft Plan Zones





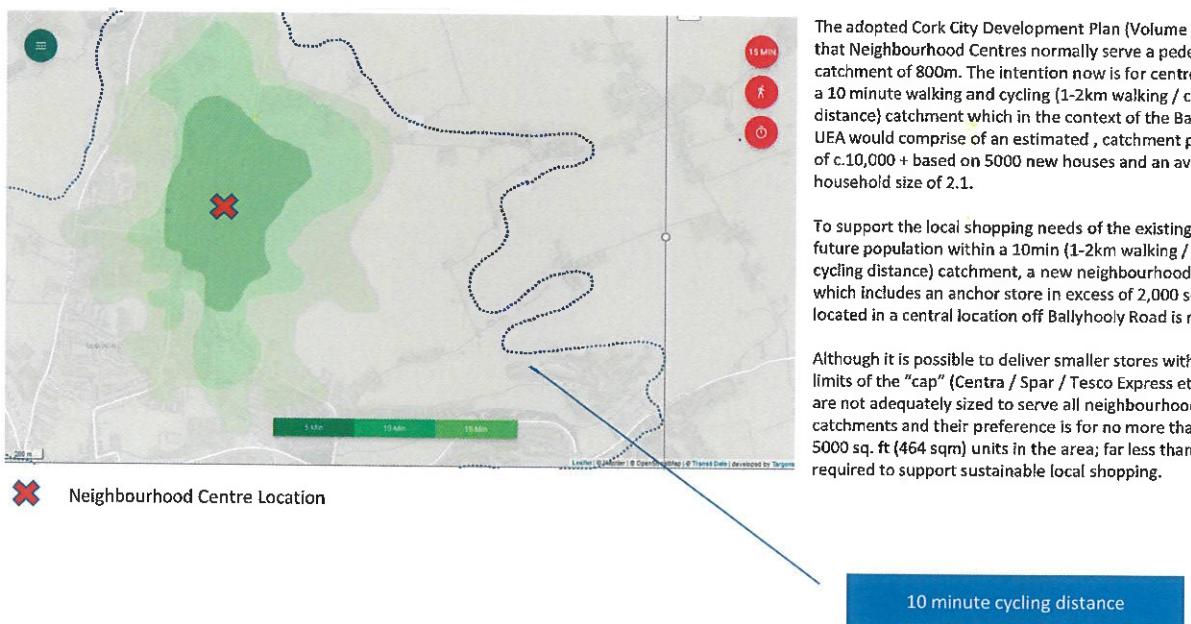
Map 5 Potential School and Employment Zone Layout





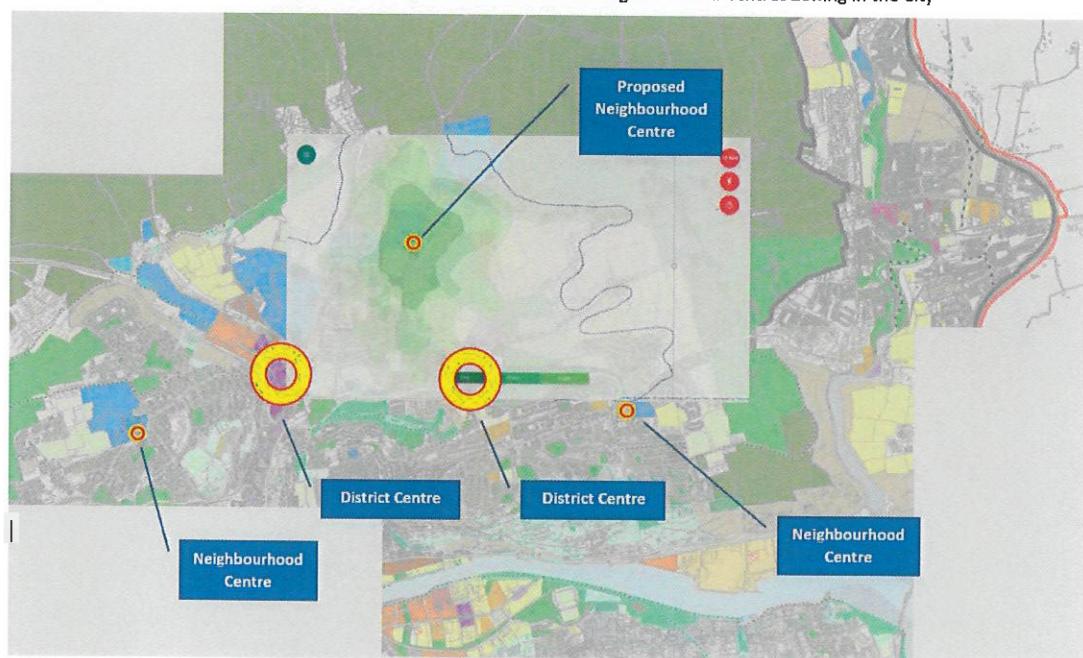
Map 6 Patterns of Movement 5-15 minutes (Walking Isochrones) & 10 Minute Cycle Distance

app.targomo.com & Extrapolation for Mayfield Kilbarry Link Rd and future estates





Map 7 Sequential Provision of Neighbourhood Centre & Distribution of Neighbourhood Centres Zoning in the City



Location of Proposed Neighbourhood Centre is consistent with pattern of need (with new development) and other centre locations relative to the two large District Centres on the North side of the City. All are generally equidistant from each other in servicing local need.



3.2.1 Rational for Neighbourhood Centre and PCC Zoning

We have Neighbourhood Centre retailers and Primary Care Centre (PCC) providers who are willing and able to deliver on our lands (in line with the suggested zoning plans that we are presenting).

They have prepared site plans and layouts that express the general arrangement of their facilities; included in this submission – see Map 3 – western side of Ballyhooley Rd.

The area of land proposed to be zoned for Neighbourhood Centre is only approx. 2.6 Ha. This is the volume of land is needed to accommodate a modest store, ancillary storage, warehousing and other retail along with necessary car parking, access etc. Overall retail volumes acceptable will have to be defined by a Retail Impact Assessment, as set out in the Draft Development Plan, but the general physical area zoned allows for a retail space that is consistent with other Neighbourhood Zones in the City.

We have co-located them to the west of Ballyhooley Rd so as to maximise the manner in which they can interact with, and service, lands to the north and west and provide for synergies from a servicing perspective. While there is a land take from *Business and Tech Zonings* to provide these uses, they will still create significant employment opportunities and would generate more employees (approx. 400 jobs in total due to their shift patterns) than a “business zoned” use would ordinarily generate on the same area of land.

These uses are also supported by Irish Water (Appendix A). The PCC can be accommodated in the *Business and Tech Zone* as it stands however, co-locating both can provide for synergy in public services, Public Transport and car parking.

Providing for these uses is important for building a community. In the location proposed, they will serve areas that are within easy reach of surrounding neighbourhoods by all modes of transport but in particular by those walking and cycling.

The proposal's / plans and drawings, also envisage and will allow for linkage and permeability to adjoining third party schemes and lands.

3.2.1.1 Retail Need

Retail Need

With respect to retail need, Ballyvolane District Centre is located to the south of Lower Dublin Hill and services a wide urban catchment for a predominantly weekly shop position. We submit that;

- a new Neighbourhood Centre is needed north of Lower Dublin Hill to serve the emerging area purely on the basis of a 15 minute City Concept.

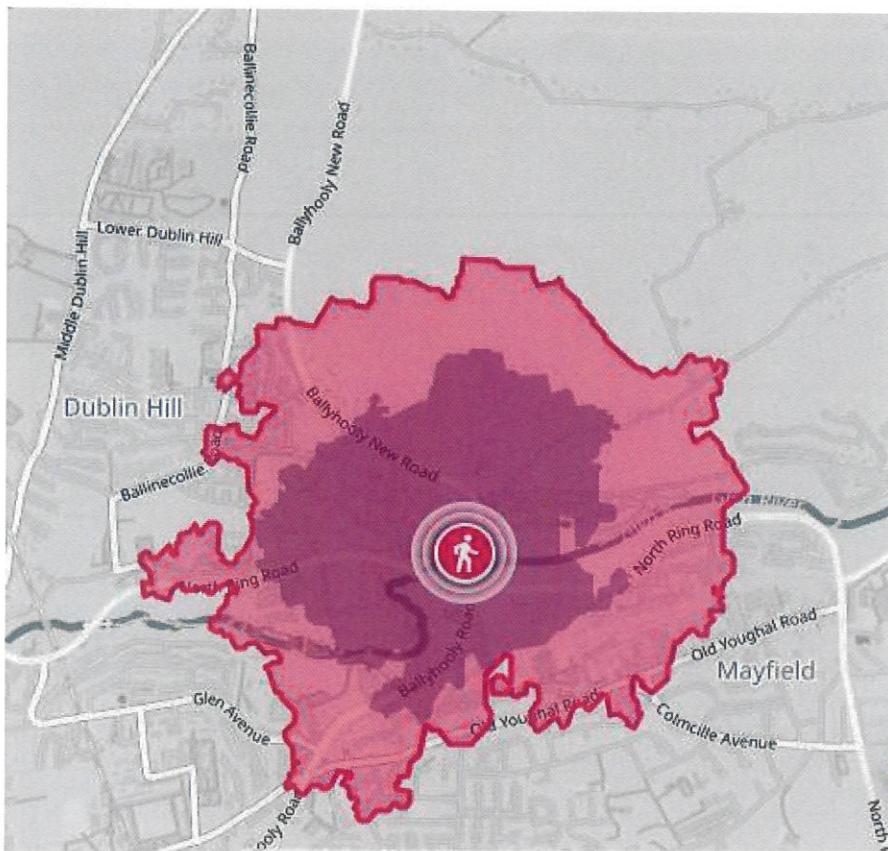
We will address this under the following headings, which reflect Objective 7.30 of the Draft Plan.

- a) A Demonstrable Need for New Retail / New Neighbourhood Centre
- b) Sequential Test
- c) Access / Transport

The existing Ballyvolane District Centre is located at some distance from the new residential areas and fulfils what would be described as a “weekly shop” function. It is not within walking or cycling

distance of the bulk of residential areas to the north so as to fulfil a 15 Minute City concept (See Figure 2 overleaf).

Figure 2: Ballyvolane Notional Service Area & 10 minute walk



Town Centre / District Centre zoning has also been reduced in the Fox and Hounds area; 2.8 Ha has been changed to Open Space from Town Centre. While that area was also a flood risk location, so is much of the City Centre and Blackpool area so it is a real loss of retail lands to amenity use.

There is scope for more Neighbourhood Centre zoning as a result to serve residential areas to the north; the area that we seek to be changed in our land holding to Neighbourhood Centre is approx. 2.6 Ha.

a) A Demonstrable Need for New Retail / New Neighbourhood Centre

The adopted Cork City Development Plan (Volume 1) states that Neighbourhood Centres normally serve a pedestrian catchment of 800m. The intention now is for centres to serve a 10 minute walking and cycling (1-2km walking / cycling distance) catchment which in the context of the Ballyvolane UEA would comprise of an estimated , catchment population of c.13,000 + based on 5000 new houses and an average household size of 2.63. New / additional retail is needed in locations close to the residential development.



We also note that an additional 17 Ha of lands has been zoned as residential north of Kilbarry. This site is also well located to meet that areas needs also with the construction of the Inner Northern Distributor Rd.

There is also a notable local catchment in development. However, the Draft Cork City Development Plan (Volume 1) states that neighbourhood centres normally serve a pedestrian catchment of 800m (or a 10-minute walk).

Currently, the nearest centre to the Ballyvolane UEA is Ballyvolane District Centre, an older centre with larger food and non-food mixes which serves a large catchment area spanning the northern fringe of the City. However, when applying both the 10-minute and 15-minute concept by foot to the existing District Centre, the catchment fails to incorporate the 753 residential dwellings coming forward to the east of Ballyhooly Road, as well as the wider residential development to the north and east comprising; refer to Map 6.

Locally, there is an additional consent north of the Longview landholdings with 74 units consented and under construction and an additional 95 units in planning. There are a further 380 units in planning at ABP to the south for O'Flynn Construction and proposals adjoining Lower Dublin Hill for additional units. Combined, there are an additional approx. 1400+ units in process or consented that will need services in the future. That equates to approx. 3600 persons at 2.63 persons per household.

In addition, Retail Impact Assessments submitted previously for the permitted Ballyvolane District Centre (Cork City Council Refs 07/32606 & 13/35651) demonstrated a large volume of trade leaking out of the Ballyvolane area and a significant under provision in retail floor space which has never been addressed. In fact, a larger volume of floorspace was permitted under the 07 consent which was unbuilt; the 2013 consent was significantly smaller.

The only retail development that has occurred in Ballyvolane since the early 2000's are extensions to the Dunnes Stores and the Lidl. No new retail floorspace has been developed to provide for need ("leakage" from the area), where even under the accepted Dunnes Stores Retail Impact Assessment projections, there was over €158.9 Million in expenditure (comparison and convenience) projected to leak out of the catchment for 2013. This leakage will have increased with traditional expenditure models for retail sales.

1. This floorspace should be well located close to proposed housing.
2. In the 10 minute (Dunnes Stores) Drive Time, in 2013, there was already an under-provision; for example of food retailing saw approx. €30 mil in expenditure available outside of the main providers of Dunnes Stores and Lidl.
3. There are approx. 2100 housing units either consented or in planning in the area. The Irish Water Drainage Area Plan for the Ballyvolane UEA provides for at least 3,200 persons. At 2.63 persons per household (average household occupancy for the City under the Joint Housing Needs Assessment) one can expect this to generate at least €27m in expenditure on food alone. This in modest terms would equate to at least a need for 2300 sq. m. nett of convenience floorspace.

In summary, even taking the projected 2013 figures from the permitted Dunnes Stores Extension, one can see that there is a real need to plan for future retail floorspace. More retail floorspace, along with retail services, is needed to provide for emerging population needs. While this floorspace



will be years in delivery with design, planning and construction occurring before trading patterns are stabilised at the "design" year⁷, this has to be located in areas that offer the best possible accessibility to the emerging community.

We submit that the most appropriate retail location for a new Neighbourhood Centre is in the area that we have identified to the West of Ballyhooey Rd and North of Lower Dublin Hill. The small land holding has the potential to deliver, subject to design and retail impact assessment, an appropriately scaled facility that reflects the range in Neighbourhood Centres in the City (both pre-existing and expanded). For example, i.e. Super Valu in Frankfield is approaching 1,900 sq.m. and Supervalu and associated spaces in Glanmire (east of Ballyvolane) which has grown to approx. 4000+ sqm GFA over time.

b) Sequential Test

The site is well located outside the immediate area of influence for the District Centre (Ballyvolane). It has its own independent catchment for a 15 min walking distance (see Map 6 and Figure 2) and provides ready access to lands to the north. The Ballyvolane District Centre clearly fulfils a wider role; as set out in their Retail Impact Statements. However, the Neighbourhood Centre has to fulfil a more local role.

Siting one in this Ballyhooey Rd / Ballincollie Lane area is in this respect good planning, serving local areas, sub catchments and emerging growth with appropriate facilities. As a pattern of development it's is not uncommon in the City to have Neighbourhood Centres in proximity to District Centres, i.e. Togher, relative to Wilton; Hollyhill, relative to Blackpool, Bishopscourt, relative to Wilton and Dunnes Stores Bandon Rd. In this respect the proposal is consistent with Retail Impact Guidelines and on a positive side, does not deplete residential lands or compromise employment generation as it has the potential to generate more employees than traditional business spaces.

Map 7 also illustrates that the proposed Neighbourhood Centre location is correctly located spatially relative to other Neighbourhood Centres and pre existing District Centres. The District Centres service a wider catchment generally speaking while the neighbourhood centres are located locally but at similar separate distances from the District Centres. The separation distance generally reflects the fact that the Neighbourhood Centres will not trade well is located close to a District Centre which will provide a wider retail role.

c) Access / Transport

The proposed Neighbourhood Centre is well located relative to the proposed Ballyhooey Rd Bus Corridor proposals and cycleways. Additional cycleways are provided as per part of the Longview Scheme to the site boundary and adjoining schemes are all being designed . delivered on the basis of permeability to allow for high degrees of connectivity for all modes of transport but in particular pedestrians and cyclists under DMURS.

Good connectivity is also possible to the adjacent Ballincollie Lane and the housing areas to the north while the site is also close to the alignment of the Inner Northern Relief Road which will allow access to those residents using orbital bus routes to access the area.

⁷ normally approx. 12 months post actual opening



3.2.1.2 Primary Care Centre

There are active calls for proposals from the HSE for Primary Care Centres in this area.

Having regard to the large number of existing residents in the area and the large number of consents and planning proposals for the area we submit that medical facilities, such as a PCC, have to be accommodated. The existing zonings allow for them to be accommodated in most areas. However, we propose to co-locate a PCC (on Business and Tech Zoned lands) with the Neighbourhood Centre and have agreed terms with an operator to deliver same. Locating the facility where we propose will also be in line with the 15 minute City concept.

The location of a Primary Care Centre in this area will allow it easy access for residents to medical facilities, pharmacies, Dentistry, Occupational Therapy, Physiotherapy and other HSE and GP based medical services.

Having these facilities in locations that are central to local populations and accessible by all modes of transport for both ambulant and mobility impaired persons is an important consideration and locating them in this area, close to the proposed Inner Northern Distributor Road and close to housing and local bus routes and pedestrian / cycle ways allows for a sustainable pattern of delivery.

3.2.2 Rational for Schools and Employment Lands Zoning

Our approach also involves relocating School and Employment (*Business and Tech*) Lands, creating new Amenity Lands and allowing for a new Neighbourhood Centre to serve the local area.

With respect to school proposals, the current educational provision in our land bank provides for a Primary and Secondary School. These, whether necessary or not, are currently zoned in an area that is at an elevated location in the area, quite physically distant from other uses, homes and transport. Its location actually encourages more vehicular traffic into residential areas and “dead end” contexts.

Collocating these uses close to the Inner Northern Distributor Rd (INDR) also generates more synergy with the public transport corridors that will be on that road; providing immediate access for employees and students to the wider area.

We have engaged previously with the Dept of Education on zonings and they have advised that they will be guided by the City Council (see Appendix E & F). There is no logic in siting a school in a location that is some distance from the other residential development lands and areas on Ballyhooley Rd to the south. Children and cars would have to travel some distance, uphill to access the school. This would be contrary to Departmental Guidance (Appendix E).

In summary, relocating the current School Zone (Cobh LAP Zone NE-C-02 - a Primary and Secondary School designation – approx. 2000 pupils) to a location closer to Ballyhooley Rd and the potential alignment of the Mayfield Kilbarry Link Road will place the schools at the centre of the emerging area, close to public transport links, central to the residential permissions and emerging applications focussed on Ballyhooley Rd.

Similarly, we submit that (*Business and Tech*) employment lands must be brought into the community in a more central area. This is the reason for introducing this zoning into an area on the eastern side of the Ballyhooley Rd.



While we understand that exact zones may only be resolved once the alignment of the Inner Northern Distributor Road is determined, and the route selection report prepared by RPS published (now with the Council, October 2021), the basic aims that we are setting out can be accommodated through zonings we propose. For example,

- if a southern alignment INDR Route is selected as the road passes through our land bank, the Education and *Business & Tech Zones* can be located to the north of the road;
- if a northerly route is selected our proposed Education and *Business & Tech Zones* can straddle the route.

No matter which alignment is selected, we have ample lands to deliver the necessary uses in a manner that makes no material change to the quantum of zoned land. We appreciate that the final INDR alignment may have to be introduced by way of a Variation to the Development Plan, due to the different timelines that the Route Selection, Detailed Design and Statutory Plan are on; i.e. consultation with stakeholders and land owners on the Route Corridors is only expected October 2021.

However, we submit that the principle of what we are proposing is included the Draft Development Plan and appropriate amendments are made.

3.2.1.1 Employment Generation

Altering uses will have a positive impact on Job Creation.

Using "Employment Densities Guide" published by the Homes & Communities Agency in the UK. Under the proposed rezoning, employment will play an integral part in creating a sustainable community. It is noted that under the proposed Longview zoning, the levels of potential employment in the community increases.

The proposed Neighbourhood Centre and Primary Care Centre all create more jobs than the uses that a conventional Business / Tech zone would generate.

In assessing the impact on employment, the Full Time Equivalent number (m2) has been used. All of these calculations assume a 20% discount factor to reflect the Net Internal Areas.

The site Business and Tech zoned lands to the west of Ballyhooley Rd have the potential to accommodate three no 40,000 sq ft "blocks" of floorspace. These, see Table x below, will generate less jobs than the proposal now made to the Council for a Neighbourhood Centre.

Table 2: Employment Generation

Current Zoning		Proposed Zoning		Job Difference
Light Use 1	79	Neighbourhood Centre	305	+226
Light Use 2	79	PCC	144	+65
Light Use 3	79	Light Use 1	79	-
Total	239		465	+291



The potential employment impact under the proposed zoning has a positive impact on the employment numbers to the local community. An uplift of approx. 300 can be expected, offering a more sustainable employment impact in the new growing area.

The change will also be consistent with the "Strategy Recommendations" of the Council's supporting *Strategic Employment Locations Study* which stated that at least 228 Ha of employment lands were required. The change that we are proposing makes no material change other than reallocating employment zoned lands.

On a related matter, should the Council find itself under pressure with respect to the provision of residential lands, there is no reason why IDA lands in Kilbarry, that have been rezoned as residential in this Draft Plan, should not revert to Industrial Use. This would further bolster the provision of employment lands and reduce any perceived over provision of residential lands elsewhere. The Kilbarry landbank is a strategic location for employment and we suggest that with the provision of the Inner Northern Distributor Road & M20 that perceived deficiencies for access will be addressed in the future.

3.2.3 Rational for Residential Lands Zoning

3.2.3.1 Reallocating Uses within the Land Holding

In reallocating uses around the landholding, we are taking into consideration the loss of zoned residential lands to infrastructure proposals and other uses (such as the widening of the Ballyhooley Rd), loss of lands to the Distributor Road to service the adjoining areas in the SHD consent. We are also proposing to change residential lands to Business and Tech Zoning on the western side of the Ballyhooley Rd to reflect land ownership boundaries. To offset these changes and losses we are proposing that the educational zoned lands are changed to residential zoning.

Map, 3 Map 4 and Section 3.2 of this submission consider the changes in detail and identify the changes that are taking place.

When all area changes are taken into consideration there is actually a nett loss in residential zoned development lands in out 200+ acres. There are still ample lands available in the City to meet development needs for residential purposes and in this respect the change is immaterial in the context of the Core Strategy.

3.2.3.2 Making Corrections to the Draft Plan Residential Zones to reflect Permissions

A small portion of residentially zoned lands on our land holding which is zoned for Tier 3 is actually the home to over 135 consented homes and apartments. This has to be an error. These lands should be identified as Tier 1 / 2.

This area is highlighted in Figure 2 following. The area is also serviced by Irish Water and is therefore, in any respect Tier 1 / 2, and the lands have to be treated the same way as the O'Leary O'Sullivan lands and other lands in the area that were altered from Tier 3 to Tier 1-2 prior to the plan being published. Indeed, the lands have to be given a higher priority as they actually have a planning consent.

The Council should note that some areas identified as housing (Draft Plan Figure 2.21) in our scheme are actually Open Space or Education for the purposes of the Tables 2.3 and 2.4 of the



Draft Plan (Approx. 13 - 23 Ha.) while other lands are zoned for Business and Tech or have other real delivery constraints. They do not deliver housing. This creates the capacity to deliver housing elsewhere within our landholding.

In total, on our land holding, the Council appear to have identified approx. 13-23 Ha (in Figure 2.21 of the Draft Plan) for housing that will not be used for housing. This will have had an impact on housing yield calculations. We submit that this may merit further review by the Council but we would ask the Council to note that in any event, with respect to actual zoned lands with defined uses, we are proposing minor changes that see no notable nett changes; see Section 3.5 of this submission following.

3.2.4 Rational for Open Space / Amenity Lands Zoning

The proposed changes see less open space locally at our landholding but more overall is provided in the area by the City Council zonings.

Our consent delivers part of a 20 Ha Public Park that was mandated for the area under the previous Local Area Plan. Approx. 19 Ha of our lands are zoned for Passive Open Space and the overall area of Passive Open Space in the UEA amounts to 60+ Ha zoned.

That "Park" was proposed to provide for a Passive Amenity for over 3000 homes.

However, the Council has now zoned an additional +2.6 Ha of Open Space in the Glen Valley, adjacent to the Fox and Hounds and +108 Ha in new park lands adjacent to the Barn Restaurant and Lauriston House / Rathcooney⁸.

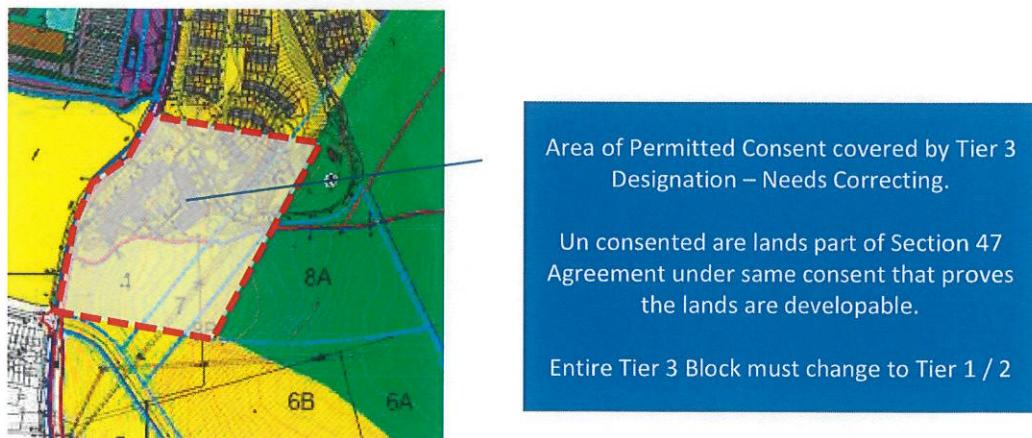
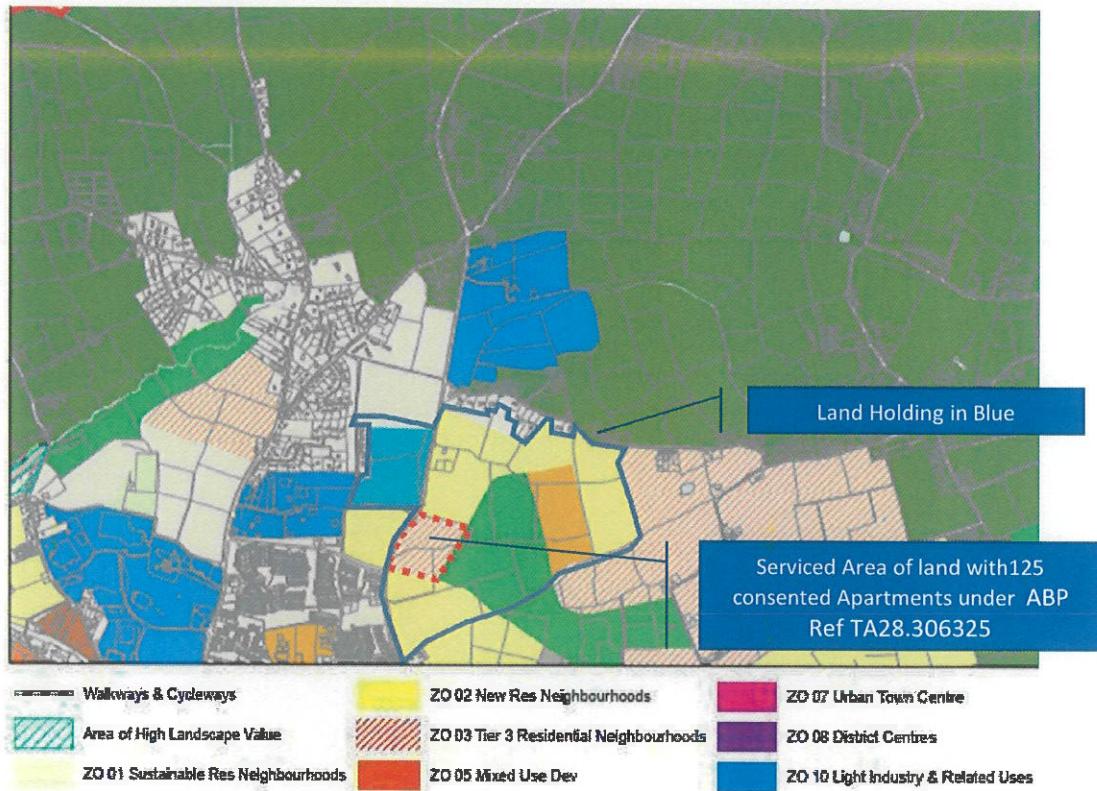
In the immediate area, the Longview lands "open space" forms part of one block currently zoned for Open Space NE-O-04 (a 35 Ha "block" of land). However, reducing this area allows for Education and Employment Uses to be delivered in central locations in a manner that integrates them with proposed greenways to the west, the open spaces to the east and the future public transport corridors such as the Mayfield Kilbarry Link Road. **This is a positive as the area is well provided with amenity spaces and there is no nett negative in the proposed zoning alterations to allow for more educational and employment lands given the additional 110+ Ha proposed to serve the area.**

Furthermore, we are proposing a more careful placing of some open space areas so as to allow them to;

- Be well placed to serve community needs.
- provide for delivery of uses in a sustainable pattern.
- provide for uses to be delivered in a manner that maximises links between areas through current and future public transport, pedestrian, cyclist and vehicular connectivity.

⁸ Please refer to proposals for the **North East Regional Park Section 10.331 and Section 10.285** which states that "*Over the long term, a North East Regional Park is proposed to accommodate the active recreational needs of Glanmire, Ballyvolane and Mayfield residents. This is discussed in more detail under North East Regional Park. In terms of the proposed growth to the south, additional open space (including local and pocket parks) and community sports ground will be required*"

Figure 2: Correction to Tier 1 on Ballyvolane Zoning Maps (See Appendix C for Consented Permission and Section Agreement 47 Lands)⁹



⁹ The Council should note that some areas identified as housing in our scheme are actually OS or Education for the purposes of the Tables 2.3 and 2.4 of the Draft Plan (Approx. 13 - 23 Ha.))



4.0 Proposed Policy Alterations

There are currently 1500+ housing units either consented or active in the planning process in the area. Overall in the area between existing and proposed homes there are approx. 4200 homes.

While we acknowledge and support the Council's intent to deliver Active Land Management through Framework Plans, the current consents and Section 47 agreements with Cork City Council, for both this company and third parties, define the framework of uses in the area.

In this respect, we submit that Framework Plans for Ballyvolane (in particular in the vicinity of Ballyhooley Rd) are not immediately necessary. We will suggest minor changes to the Draft Development Plan text in this respect in particular **Objective 10.73 Ballyvolane Framework Plan** which states that;

"Cork City Council will work with relevant stakeholders to produce a Framework Plan to support the sustainable growth of Ballyvolane and provide a coherent and coordinated land use plan for Ballyvolane and its immediate environs".

We request that this is changed to read:

"Cork City Council has been central to the design and layout of recent planning consents in the Ballyvolane area through the development management process; as the area's administration moved from Cork County Council to being part of the City Council's administrative area. There are significant consented permissions and significant landbanks in the area that are both serviced and serviceable and we will work with relevant stakeholders on proposals to produce a Framework Plan to support the sustainable growth of Ballyvolane and provide inclusive, sustainable and permeable proposals for new residential areas along with all necessary services and amenities a coherent and coordinated land-use plan for Ballyvolane and its immediate environs".

5.0 Car Parking – A Critical Development Management Standard

We have concerns that the Council's proposed car parking standards will stymie commercial development of services, offices and other employment generators.

The standards that are proposed, while proposed to be subject to review, present a strict standard "day one". If development, employment and residential development stops, it is hard to restart it given the mobile nature of capital.

We submit that it is important that the Plan allows the City to move gradually to the ambitious standards that are sought and to allow for measures that allow for flexibility on density and car parking in particular.

The standards are for example, stricter than what is being delivered in London for example, a City with higher density and very effective and mature public transport (see Appendix B). There are also certain retail activities that will always tend towards vehicular transport, i.e. food retailing is almost exclusively catered for via the private car or taxi for central City located food retailers. Busses are not generally the modal choice for food retailing. In such cases, we submit that more relaxed standards should apply to food shopping and neighbourhood centres.

Appendix B provides additional insight on car parking. In summary though, the car parking proposed is:

1. Stricter than our immediate competitors (Limerick / Waterford)
2. Stricter or comparable to the Dublin Local Authorities (who have better public transport and more modal shift); and
3. Stricter than London (an area with very mature public transport) for food retail.

Pragmatic solutions can be achieved to car parking standards though recognising the need to be flexible in advance of public transport provision.

Another option is to use *Accessibility Matrices*, such as in the UK, where more relaxed parking standards are used in areas with less public transport. Using such an approach would provide flexibility and address the real challenge of providing for modal shift though Bus Connects.

If Bus Connects is delayed, or the routes are not where zoning presupposed, how then do you reconcile demanding parking standards with no Public Transport?

We submit that it is wise to progressively move to strict standards rather than seek to impose them day one.

5.1 Specific Requests

On foot of the GL Hearn report (and CSR report which provides specific comparisons on Car Parking with other Irish locations) in Appendix B we recommend that car parking standards for food retail sales and warehousing suggested in Table 11.13 are modified to:

- a. 1 space per 20 sq m GFA for Convenience Retail for Zone 3 and
- b. 1 space per 30 sq m GFA for Convenience Retail for Zone 2, and
- c. 1 space per 20 sq m GFA for Convenience Retail for Zone 2 (where there is no major public transport in operation),

- d. Warehousing to be 1 Space per 100 sq. m. (This would match the County Plan standard and would ensure that there is adequate provision of car parking for distribution uses in the City).
- e. We also ask that Table 4.6 is altered to state that Ballyvolane will be in Zone 3 until Bus Connects is delivered.

Suggested Table 4.6 Edit / Revision (Edit Text in Bold)

Zone 2	Areas accessible to mass transit (existing or proposed Light Rail Corridor, Core Bus Network) Most City Suburbs, including Ballincollig, Ballyphehane, Ballyvolane (until Bus Connects is delivered Ballyvolane will be considered Zone 3) , Bishopstown, Blackrock, Blackpool, Douglas Mahon, Mayfield, Sundays Well, Togher
--------	---

6.0 Density – Housing per Ha.

Cork City should give itself the best possible means of meeting its housing needs in a viable manner.

Section 3.24 of the Draft City Plan states that “*as a general rule the minimum density shall be 35 dwellings per hectare (nett density)*”.

Arbitrary density numbers can be achieved in many ways but the costs of delivery differ significantly between different houses types and methods of construction. It is possible to design schemes that meet density objectives but also maintain viability having regard to topography and ground conditions.

For example, given that it is clear that the State will, under *Housing for All*, be taking a more active part in housing delivery, wouldn’t it be prudent for the state to give itself the best possible opportunity to deliver housing that offers the best number of units for cost of delivery.

Simple density (units per Ha) targets may not allow scope for designers to deliver schemes that are cost effective or viable.

The 35 units per ha. figure is obviously derived from the Residential Density Guidelines. While delivering housing at this density is possible the National Standard is simply derived from UK guidance. What we are advocating is that the Council should allow for flexibility in planning decisions surrounding housing delivery by including the density matrix from the *Urban Design Compendium Homes and Communities Agency UK* as a reference.

Irish Guidance, is derived from UK guidance¹⁰ which delves further into the discussion of density by also looking at *Habitable rooms Per Hectare*. Table 3 is a Density Matrix extracted from the “*Urban Design Compendium Homes and Communities Agency UK*”. Put in simple terms,

- Ireland has used UK density guidance for a Per Ha figure.
- The UK uses design / space standards that allow more smaller units per Ha. This is a fact.
- Irish design guidance does not allow for “small houses” such as in the UK but still seeks to use the UK 35 Per Ha standard.
- Using the 35 Per Ha standard without reference to the flexibility that is allowed by the *Urban Design Compendium Homes and Communities Agency UK* will lead to constrained housing supply as delivery focusses on density criteria that are difficult to make viable in all locations.

To have regard to rooms per Ha as a tool in the decision, making process reflects a more nuanced approach to density than the raw calculation of housing density as a function of units per Ha.

¹⁰ *Urban Design Compendium Homes and Communities Agency UK*

Table 3: Extract from *Urban Design Compendium Homes and Communities Agency UK*

		Option 1	Option 2	Option 3
Car Parking Provision		High 2-15 spaces per unit	Moderate 15-1 space per unit	Low less than 1 space per unit
Redominant Housing Type		Detached & linked houses	Terraced houses & flats	Mostly flats
Location	Setting			
Site within Town Centre 'Ped-Shed'	Central			240-1100 hr/ha 240-435 u/ha Ave. 2.7 hr/u
	Urban		200-450 hr/ha 55-175 u/ha Ave. 3.1 hr/u	450-700 hr/ha 105-275 u/ha Ave. 2.7 hr/u
	Suburban		240-250 hr/ha 35-60 u/ha Ave. 4.2 hr/u	250-350 hr/ha 80-120 u/ha Ave. 3.0 hr/u
Sites along Transport Corridors & Sites close to a Town Centre 'Ped-Shed'	Urban		200-300 hr/ha 50-100 u/ha Ave. 3.7 hr/u	300-450 hr/ha 100-150 u/ha Ave. 3.0 hr/u
	Suburban	150-200 hr/ha 30-50 u/ha Ave. 4.6 hr/u	200-250 hr/ha 50-80 u/ha Ave. 3.8 hr/u	
Currently Remote Sites	Suburban	150-200 hr/ha 30-65 u/ha Ave. 4.4 hr/u		

Table 3.3 Density matrix

Average densities are based on case studies analysed as part of the *Sustainable Residential Quality: Exploring the housing potential of large sites* research (LPAC, DETR, GOL, LT and HC, 2000)



7.0 Conclusion

The Ballyvolane Urban Expansion area is a serviced area suitable for development with consented permissions within 3 km of the Centre of the City.

It is serviced by consented infrastructure which under an Irish Water Drainage Infrastructure Plan provides for an additional 3,200 units on top of existing housing provisions.

The area is home to a range of land uses. However, these need to be enhanced and improved upon. We have engaged with providers of uses and facilities that can and will contribute to the area's growth as a community. However, they can only be provided in locations that address constraints and be accessible to communities.

On our 200+ acre landbank the current Draft zonings reflect, by in large, the previous Cork County Council LAP; they are **not ideal or workable due to topography, power lines or location / accessibility**. This has been clearly dealt with by Cork Co Co, Cork City Council and ABP on Strategic Housing Development Ref TA28.306325; our consent for Longview Estates.

However, now presents the appropriate time to address how facts and understanding on the ground have changed. In summary;

1. the zonings no longer reflect the permitted uses / layouts; **why not correct them?** – i.e. see Figure 2.
2. in cases they do not reflect property / or natural boundaries -i.e. on the western side of the Ballyhooley Rd – an orphan area of residential was created (Map 4 – see area 2A); **why not correct them?**
3. **the older zonings did not adequately address topography** or other critical constraints to delivery, i.e. 110kv lines). Repeating the previous "County Zones" will not address the need to develop a community which can only be addressed by relocating land uses in a manner that is deliverable and sustainable. – i.e. see Map 2 and Map 3.

Other changes must also be made to the plan to reflect facts and errors.

For example;

- a) **the Council has placed part of our live consent in Tier 3 zoning.** This has to be corrected to Tier 1 / Tier 2 as the land is serviceable – i.e. see Figure 2.
- b) **Some lands identified in the HNDA as housing lands are “lost” to infrastructure** (i.e. a 1600m distributor road in our consent (ABP Ref TA28.306325) has taken up nearly 2.5 Ha of residential development lands. – i.e. see Map 3.
- c) **The Council should note that some areas identified as housing (Draft Plan Figure 2.21) in our scheme are actually Open Space or Education for the purposes of the Tables 2.3 and 2.4 of the Draft Plan (Approx. 13 - 23 Ha.) while other lands are zoned for Business and Tech or have other real delivery constraints. They do not deliver housing. This creates the capacity to deliver housing elsewhere within our landholding.** In total, on our land holding, the Council appear to have identified approx. 13-23 Ha for housing that will not be used for housing. This will have had an impact on housing yield calculations. We submit that this



may merit further review by the Council but we would ask the Council to note that in any event, with respect to actual zoned lands with defined uses, we are proposing minor changes that see no notable nett changes; see Section 3.5 of this submission following.

Our requests are completely consistent with the Draft Plan objectives. In particular, Section 10.300 of the Draft Plan which states that;

"10.300 Significant areas of land on either side of Ballyhooly Road to the northeast of Ballyvolane are identified for future growth including residential, employment, local services and open space. The majority of this land rises in a north-easterly direction. This land release will require associated infrastructure, social and community services and facilities including education, community centre, sustainable and active travel, retail, community sports grounds and public open space".

With respect to the above objectives:

We have a live planning permission for:

1. 750 homes
2. A distributor road. Over designed for the purposes of our consent so that it can serve as part of the wider future network.
3. Set backs and permanent provision of cycleways and footpaths for the Ballyhooley Rd improvements.
4. The Irish Water infrastructure; including a Strategic Pumping Station that will serve Monard and Blarney in due course. This infrastructure, will provide for services for up to 10,000 units in due course with over 3200 units in their Drainage Area Plan for the Ballyvolane area.
5. Community Hall.
6. Parklands. Our consent commences the delivery of a 20 Ha Public Park that was an objective of the LAP. Our Section 47 agreement with City Hall provides for use to keep approx. 17 Ha of Open Space lands available for the Park.
7. Local shops; 2 small local shops are provided in our consent along with GP facilities.
8. Sustainable and Active Travel provisions including dedicated pedestrian and cyclist linkages throughout the scheme.
9. Access to school zoned lands.

What the area needs, and we can provide, to follow through on the objectives of 10.300 are:

- a) A centrally located Neighbourhood Centre.
- b) Medical Facilities, i.e. a PCC (Primary Care Centre).
- c) Centrally located Educational facilities.
- d) Centrally located Employment lands.

We have the landbank located in the right position to allow these to be provided in a manner that complies with the 15 minute City Concept and we ask the Council to support our proposed alterations.

Yours Sincerely

John Crean

Longview Estates Ltd, Unit 74, Penrose Wharf, Cork



Appendix A Irish Water Correspondence

RE: Longview
RE: Longview



Shane Moriarty

Carrig Mor House
10 High Street
Douglas Road
Co. Cork
T12KC68

26 July 2021

Uisce Éireann
Bóca CP.448
Oifig Stáitseachálaí
Cathair Chorca
Cathair Chorca

Irish Water
PO Box 448,
South City
Delivery Office,
Cork City

www.water.ie

Re: CDS21001218 pre-connection enquiry - Subject to contract | Contract denied

Connection for Business Connection of 1 unit(s) at Ballyhooley Rd, Ballyvolane, Co. Cork

Dear Sir/Madam,

Irish Water has reviewed your pre-connection enquiry in relation to a Water & Wastewater connection at Ballyhooley Rd, Ballyvolane, Co. Cork (the Premises). Based upon the details you have provided with your pre-connection enquiry and on our desk top analysis of the capacity currently available in the Irish Water network(s) as assessed by Irish Water, we wish to advise you that your proposed connection to the Irish Water network(s) can be facilitated at this moment in time.

SERVICE	OUTCOME OF PRE-CONNECTION ENQUIRY
	<u>THIS IS NOT A CONNECTION OFFER. YOU MUST APPLY FOR A CONNECTION(S) TO THE IRISH WATER NETWORK(S) IF YOU WISH TO PROCEED.</u>
Water Connection	Feasible Subject to upgrades
Wastewater Connection	Feasible Subject to upgrades
SITE SPECIFIC COMMENTS	
Water Connection	A watermain extension is required to service the proposed development. It is currently envisaged that Irish Water will deliver these works subject to certain details being finalised. The programme for delivery of the works is to be confirmed at this point in time.
Wastewater Connection	Wastewater network upgrades are required to service the proposed development. It is currently envisaged that Irish Water will deliver these works subject to certain details being finalised. The programme for delivery of the works is to be confirmed at this point in time.

Stáitíocht / Directors: Cathal Ó hUalláin (Chairman), Niall Gleeson, Eamon Galvin, Yvonne Hanrahan, Brendan Murphy, Maria O'Dwyer
Cúllacháin / Registered Office: Tech Caorá, 24-26 Strand Theobald, Ballybray Climb, 1, 001 40000 / Cork Street, 24-26 Talbot Street, Dublin 1, D01 NP60
Is cumadach a ghríordachadh aonair i measc an stáitíochta a úsáidtear. Irish Water is a designated utility company, limited by shares.
Fionnraí Chúlairíteach in Éirinn / Registered in Ireland No: 230363



Ref:112

The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this development shall comply with the Irish Water Connections and Developer Services Standard Details and Codes of Practice that are available on the Irish Water website. Irish Water reserves the right to supplement these requirements with Codes of Practice and these will be issued with the connection agreement.

The map included below outlines the current Irish Water infrastructure adjacent to your site:



Reproduced from the Ordnance Survey of Ireland by Permission of the Government. License No. 3-3-34

Whilst every care has been taken in its compilation Irish Water gives this information as to the position of its underground network as a general guide only on the strict understanding that it is based on the best available information provided by each Local Authority in Ireland to Irish Water. Irish Water can assume no responsibility for and give no guarantees, undertakings or warranties concerning the accuracy, completeness or up to date nature of the information provided and does not accept any liability whatsoever arising from any errors or omissions. This information should not be relied upon in the event of excavations or any other works being carried out in the vicinity of the Irish Water underground network. The onus is on the parties carrying out excavations or any other works to ensure the exact location of the Irish Water underground network is identified prior to excavations or any other works being carried out. Service connection pipes are not generally shown but their presence should be anticipated.

General Notes:

- 1) The initial assessment referred to above is carried out taking into account water demand and wastewater discharge volumes and infrastructure details on the date of the assessment. The availability of capacity may change at any date after this assessment.
- 2) This feedback does not constitute a contract in whole or in part to provide a connection to any Irish Water infrastructure. All feasibility assessments are subject to the constraints of the Irish Water Capital Investment Plan.



- 3) The feedback provided is subject to a Connection Agreement/contract being signed at a later date.
- 4) A Connection Agreement will be required to commencing the connection works associated with the enquiry this can be applied for at <https://www.water.ie/connections/get-connected/>
- 5) A Connection Agreement cannot be issued until all statutory approvals are successfully in place.
- 6) Irish Water Connection Policy/ Charges can be found at <https://www.water.ie/connections/information/connection-charges/>
- 7) Please note the Confirmation of Feasibility does not extend to your fire flow requirements.
- 8) Irish Water is not responsible for the management or disposal of storm water or ground waters. You are advised to contact the relevant Local Authority to discuss the management or disposal of proposed storm water or ground water discharges
- 9) To access Irish Water Maps email datarequests@water.ie
- 10) All works to the Irish Water infrastructure, including works in the Public Space, shall have to be carried out by Irish Water.

If you have any further questions, please contact Dario Alvarez from the design team on + 353 2254621 or email dalvarez@water.ie For further information, visit www.water.ie/connections.

Yours sincerely,

A handwritten signature in black ink that appears to read "Yvonne Harris".

Yvonne Harris
Head of Customer Operations



Shane Moriarty

Carraig Mor House
10 High Street
Douglas Road
Co. Cork
T12KC66

27 July 2021

Uisce Éireann
Balla CIP 448
Cúig Sheacháilteach
Cathair Theas
Cathair Chorca

Irish Water
PO Box 448
South City
Delivery Office
Cork City

www.water.ie

Re: CDS21001217 pre-connection enquiry - Subject to contract | Contract denied
Connection for Business Connection of 1 unit(s) at Ballyhooley Rd, Ballyvolane, Co. Cork

Dear Sir/Madam,

Irish Water has reviewed your pre-connection enquiry in relation to a Water & Wastewater connection at Ballyhooley Rd, Ballyvolane, Co. Cork (the Premises). Based upon the details you have provided with your pre-connection enquiry and on our desk top analysis of the capacity currently available in the Irish Water network(s) as assessed by Irish Water, we wish to advise you that your proposed connection to the Irish Water network(s) can be facilitated at this moment in time.

SERVICE	OUTCOME OF PRE-CONNECTION ENQUIRY
	THIS IS NOT A CONNECTION OFFER. YOU MUST APPLY FOR A CONNECTION(S) TO THE IRISH WATER NETWORK(S) IF YOU WISH TO PROCEED.
Water Connection	Feasible Subject to upgrades
Wastewater Connection	Feasible Subject to upgrades
SITE SPECIFIC COMMENTS	
Water Connection	A watermain extension is required to service the proposed development. It is currently envisaged that Irish Water will deliver these works subject to certain details being finalised. The programme for delivery of the works is to be confirmed at this point in time.
Wastewater Connection	Wastewater network upgrades are required to service the proposed development. It is currently envisaged that Irish Water will deliver these works subject to certain details being finalised. The programme for delivery of the works is to be confirmed at this point in time.

Editorial / Directors: Caoilí Ó Siadhail (Chairman), Niall Gleeson, Eamon Galvin, Wayne Harris, Brendan Murphy, Mario Ó Dálaigh
Offic Chláiríochta / Registered Office: Teach Ceoil, 34-36 Sceilg Tharbhail, Baile Átha Cliath 1, D01 NPF0 / Coláiste Heisceir, 34-36 Talbot Street, Dublin 1, D01 NPF0
Is cuntas a gairid i mbarrach aonarach a fhaileann an scáileann a úsáid Eireann / Irish Water is a designated utility company, limited by shares
Síniú Chláiríochta in Éirinn / Registered in Ireland No: 530583

00000000000000000000000000000000

The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this development shall comply with the Irish Water Connections and Developer Services Standard Details and Codes of Practice that are available on the Irish Water website. Irish Water reserves the right to supplement these requirements with Codes of Practice and these will be issued with the connection agreement.

The map included below outlines the current Irish Water infrastructure adjacent to your site:



Reproduced from the Ordnance Survey of Ireland by Permission of the Government. License No. 3-3-34

Whilst every care has been taken in its compilation Irish Water gives this information as to the position of its underground network as a general guide only on the strict understanding that it is based on the best available information provided by each Local Authority in Ireland to Irish Water. Irish Water can assume no responsibility for and give no guarantees, undertakings or warranties concerning the accuracy, completeness or up to date nature of the information provided and does not accept any liability whatsoever arising from any errors or omissions. This information should not be relied upon in the event of excavations or any other works being carried out in the vicinity of the Irish Water underground network. The onus is on the parties carrying out excavations or any other works to ensure the exact location of the Irish Water underground network is identified prior to excavations or any other works being carried out. Service connection pipes are not generally shown but their presence should be anticipated.

General Notes:

- 1) The initial assessment referred to above is carried out taking into account water demand and wastewater discharge volumes and infrastructure details on the date of the assessment. The availability of capacity may change at any date after this assessment.
- 2) This feedback does not constitute a contract in whole or in part to provide a connection to any Irish Water infrastructure. All feasibility assessments are subject to the constraints of the Irish Water Capital Investment Plan.

- 3) The feedback provided is subject to a Connection Agreement/contract being signed at a later date.
- 4) A Connection Agreement will be required to commencing the connection works associated with the enquiry this can be applied for at <https://www.water.ie/connections/get-connected/>
- 5) A Connection Agreement cannot be issued until all statutory approvals are successfully in place.
- 6) Irish Water Connection Policy/ Charges can be found at <https://www.water.ie/connections/information/connection-charges/>
- 7) Please note the Confirmation of Feasibility does not extend to your fire flow requirements.
- 8) Irish Water is not responsible for the management or disposal of storm water or ground waters. You are advised to contact the relevant Local Authority to discuss the management or disposal of proposed storm water or ground water discharges
- 9) To access Irish Water Maps email datarequests@water.ie
- 10) All works to the Irish Water infrastructure, including works in the Public Space, shall have to be carried out by Irish Water.

If you have any further questions, please contact Dario Alvarez from the design team on +353 2254621 or email dalvarez@water.ie For further information, visit www.water.ie/connections.

Yours sincerely,



Yvonne Harris

Head of Customer Operations



Appendix B GL Hearn and CSR Planning Reports

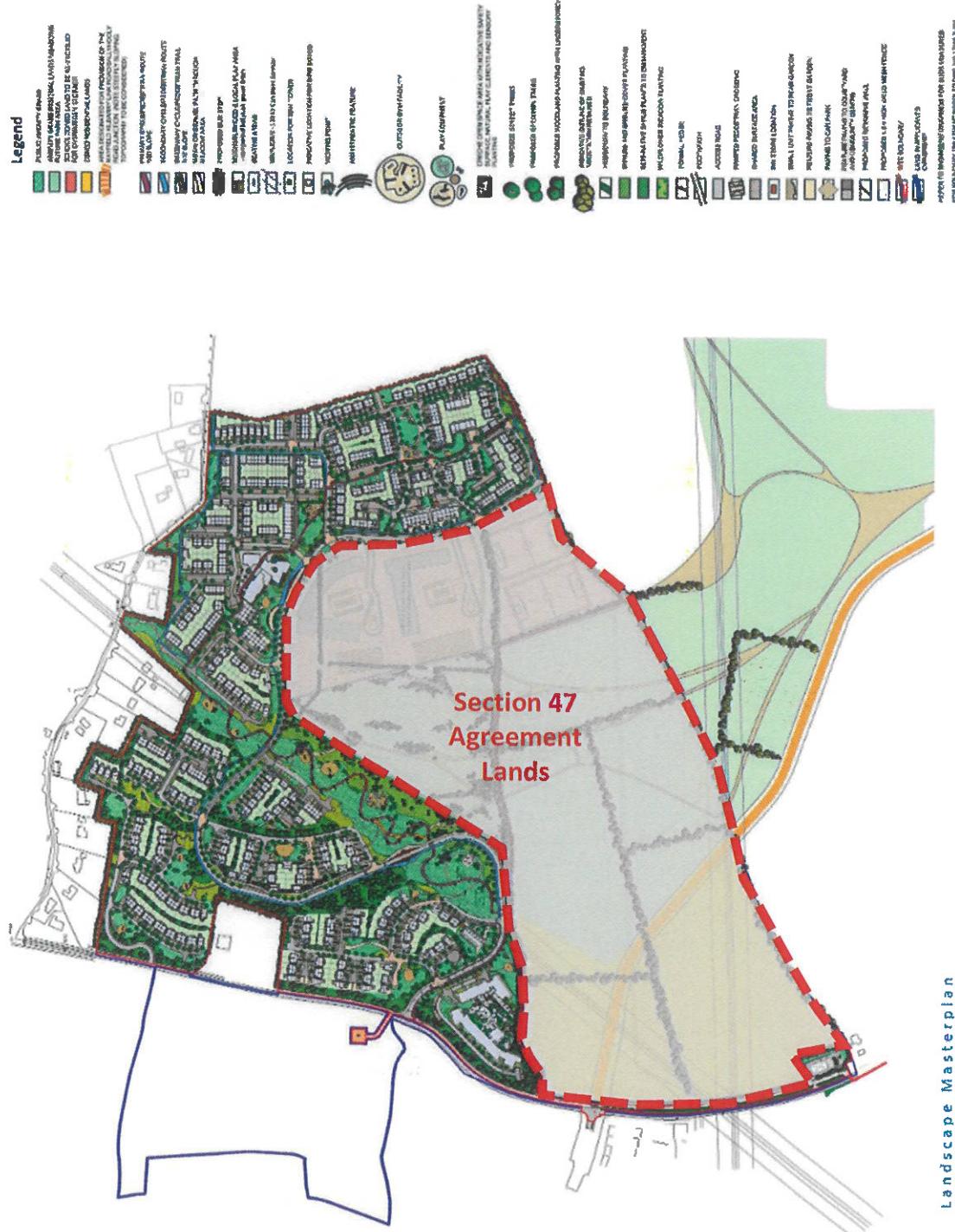
Appendix B 1 GL Hearn Report on 15 Minute City and Neighbourhood Centre

Appendix B 2 GL Hearn Report on Car Parking

Appendix B 3 CSR Report on Zoning and Car Parking

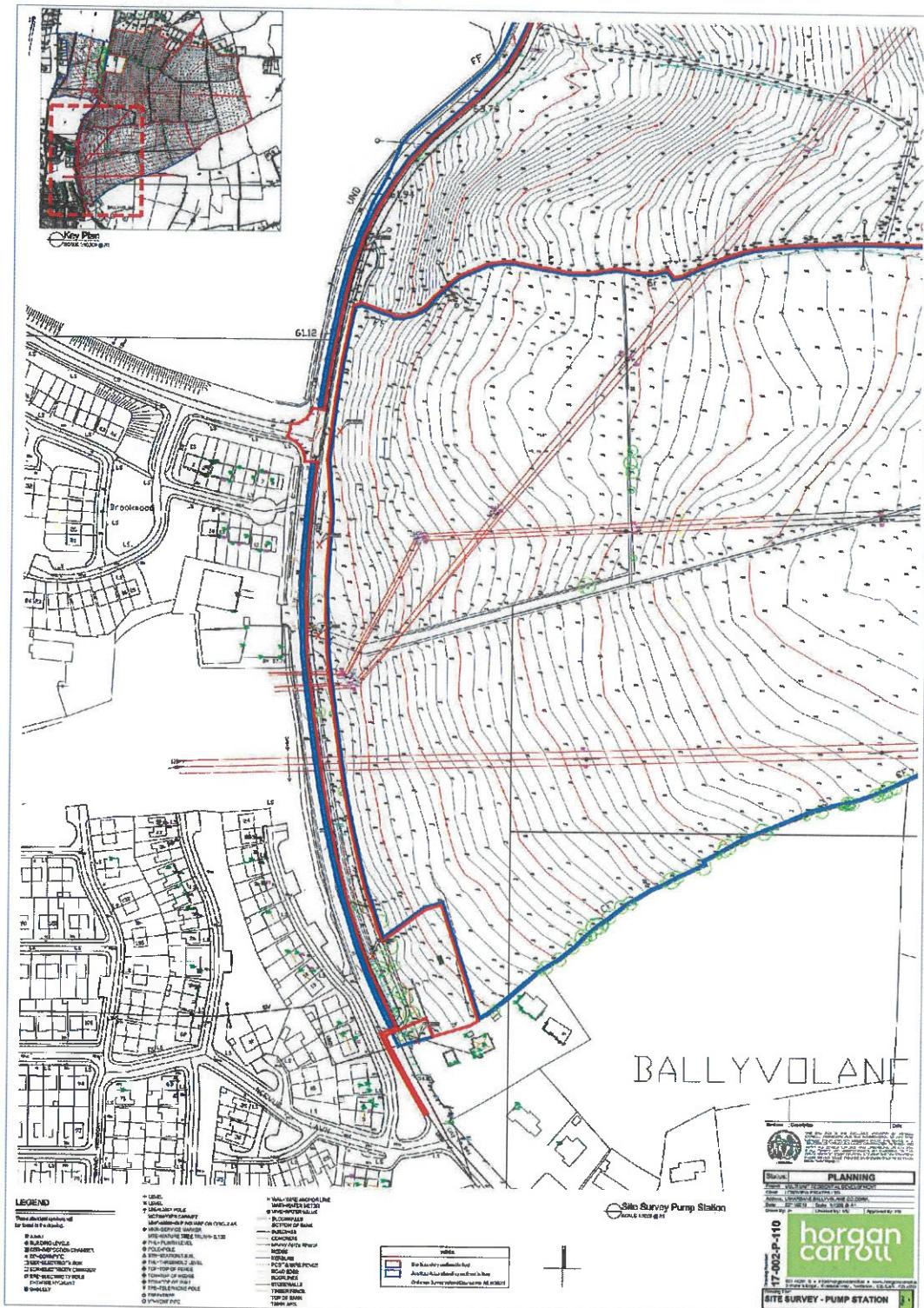


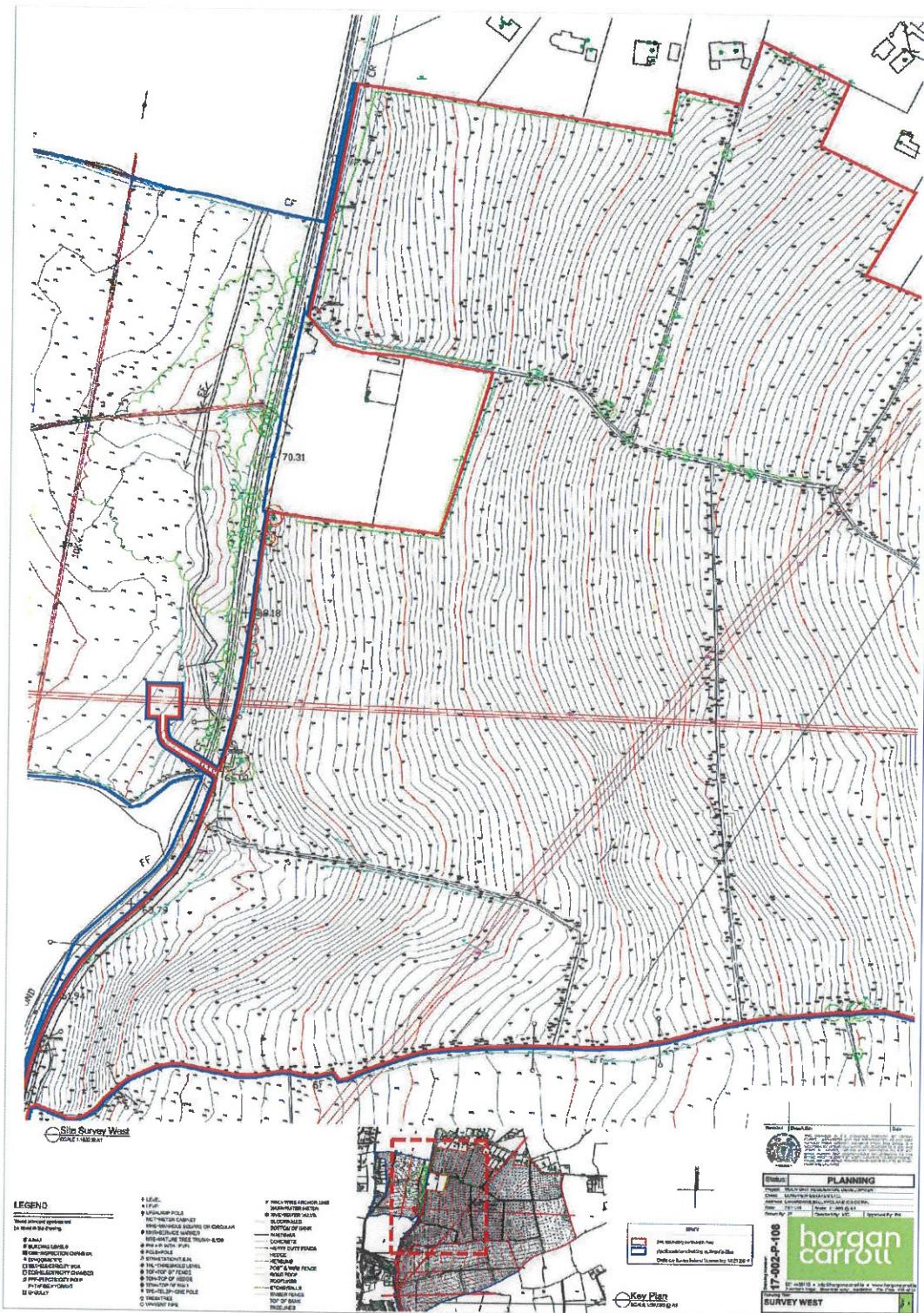
Appendix C Consent and Section 47 Lands

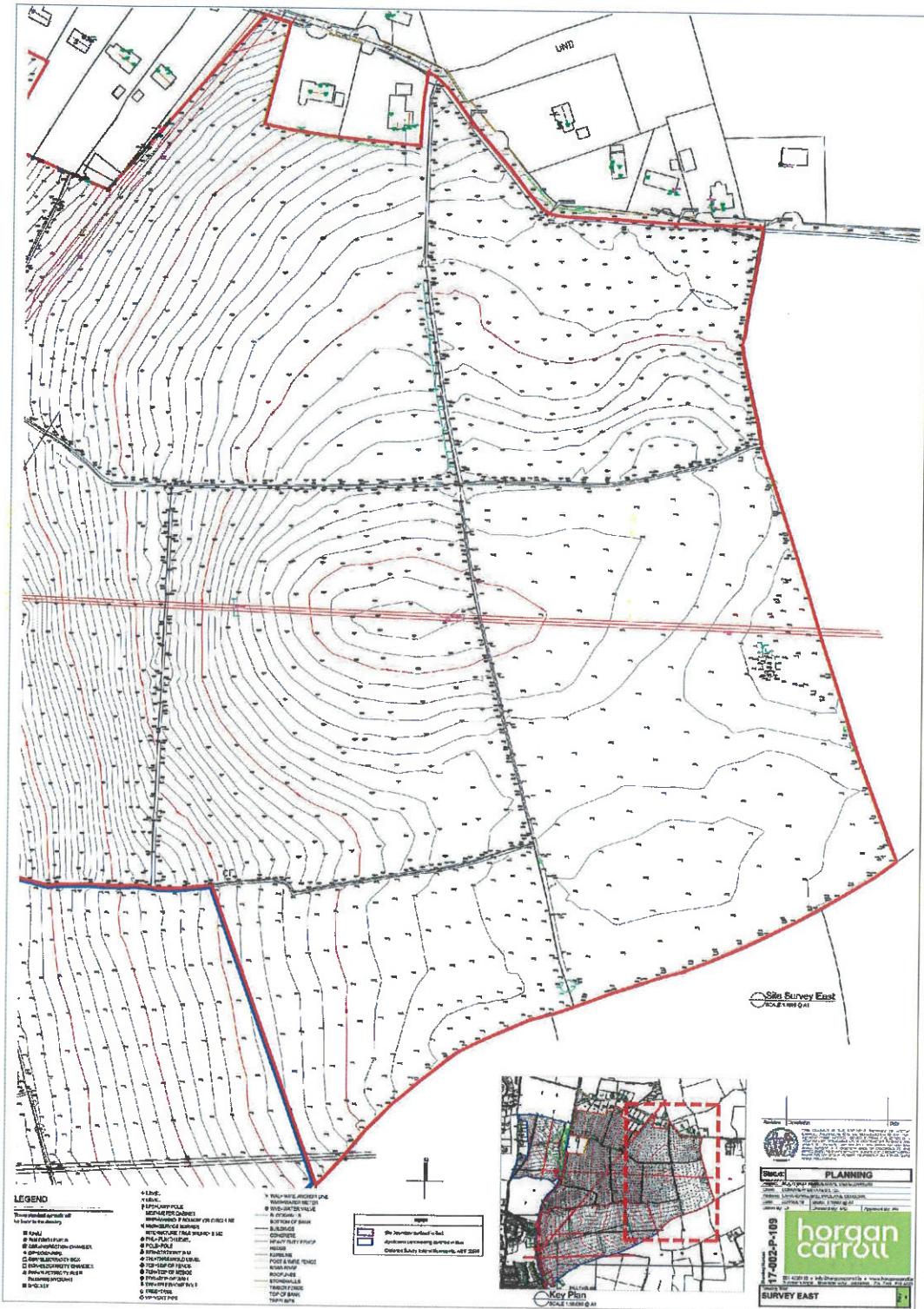


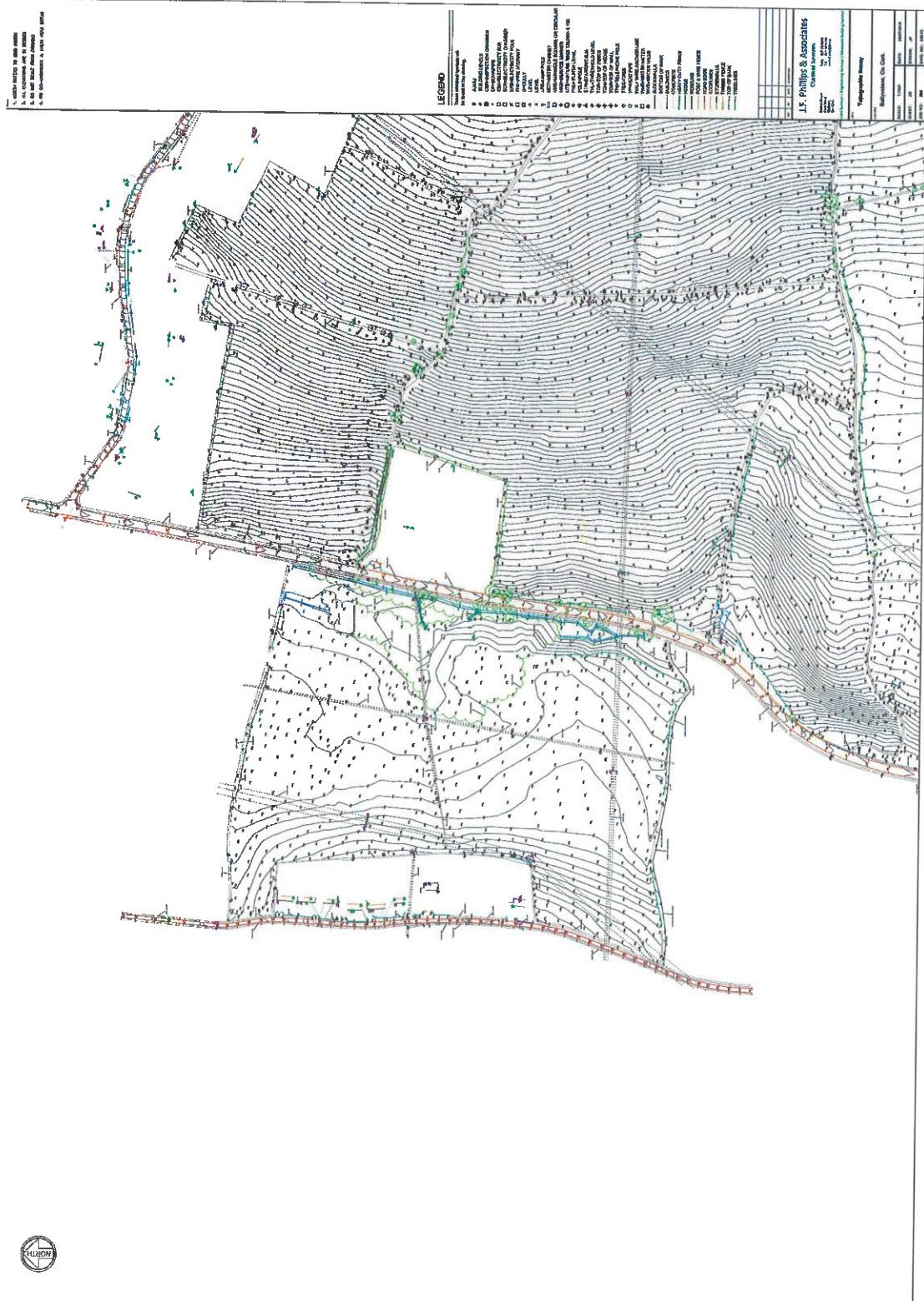


Appendix D Topography Plans / Survey









Appendix E School Location Guidance – Wellbeing for Students / Children

Relocating the School Lands

It is a well established fact that schools are a key attractor of traffic. Locating them at the centre of emerging residential areas with good connectivity to all modes of transport can only be a positive.

Over recent years many Department of Education and Skills documents have recognised this along with the role that the Statutory Plan Process has in area based transport planning. For example, the Department of Education and Skills *“Education for Sustainability’ The National Strategy on Education for Sustainable Development in Ireland - Report of Interim Review and Action Plan for Q4 2018-Q4 2020”*, the NTA / An Taisce *“Toolkit for School Travel”* and the TII’s *“Area Based Transport Assessment (ABTA) Guidance Notes”* all recognise that locating schools in a manner where they are integrated, rather than peripheral, has the potential to reduce car based movements to peripheral locations while also generating a wide range of positive effects both socially, in the areas of student “wellbeing”, and in influencing longer-term patterns of behaviour with respect to walking and cycling. These in turn can have even more benefits in the longer term in relation to health and fitness. The NTA / An Taisce *“Toolkit for School Travel”* goes into many of the benefits of moving away from car based trips to access schools. It states that;

- Cycling has many benefits which are not just limited to your health, happiness and local environment. Cycling emits less pollution than other modes of transport - for every short journey made by bicycle you can save 2kg on your CO2 emissions compared to travelling by car.
- 1 in 4 pupils live within 1 kilometre of their school. It takes only 10 to 15 minutes to walk 1 kilometre (CSO Census 2006).

The Department of Education and Skills ‘Education for Sustainability’ The National Strategy on Education for Sustainable Development in Ireland - Report of Interim Review and Action Plan for Q4 2018-Q4 2020” states that;

- The statutory plans incorporate sustainable land management and resource efficiency principles and standards for all developments. It is through the role of the DES as a statutory consultee that educational infrastructure will continue to improve its sustainability performance in terms of location and position within the community it services in terms of embodied energy, energy in use, and transport energy.

The Dept of Education and Skills report “Physical Education, Physical Activity and Sport for Children and Young People” aims to ensure “children are committed to regular participation in physical education, physical activity and sport, including walking or cycling for everyday travel needs”. This can be achieved by locating the school in a central area as demonstrated on Map 6.