

CONSTRUCTION INDUSTRY FEDERATION

CORK BRANCH SOUTHERN REGION

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Kevin O'Connor
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City Hall, CORK

1st October 2021

Re: Submission to the Draft Cork City Development Plan 2022 - 2028

Dear Mr O'Connor

As Director of the Construction Industry Federation (CIF), Southern Region, I welcome the opportunity to make this submission to the Draft Cork City Development Plan 2022 - 2028 (dCDP).

The CIF is the representative body for construction companies and contractors working across all sectors in Ireland. This submission is based on wide consultation of CIF members in the Southern Region and is submitted in a spirit of partnership for the future development and economic growth of Cork City.

As submitted during the Issues Paper consultation phase, the CIF is a key stakeholder in delivering the ambitious growth targets for Cork City set out in the National Planning Framework (NPF) and Regional Economic and Spatial Strategy for the Southern Region (RSES). Much of the projected growth in the city will be dependent on private sector investment and construction. Targeted growth rates for Cork City will not be achieved if the construction industry cannot demonstrate financial viability to the investment sector. It is therefore key that Cork City Council provide a planning policy framework that enables construction of housing and employment developments in the immediate term.

Broadly the CIF support the objectives of the draft City Development Plan and acknowledge the challenges for the Planning Authority providing a unitary planning policy framework for the extended city boundary.

The submission is structured as follows:

- 1 Housing Demand
- 2 Residential Land
- 3 Brownfield / Infill Land
- 4 Distribution of Core Strategy Targets
- 5 Employment Land



- 6 Commercial Parking Standards
- 7 Infrastructure Provision / Implementation
- 8 Building Heights & Density
- 9 View Management Framework
- 10 Development Management Requirements
- 11 Implementation

1 Housing Demand

We note that the housing supply targets given in Table 3.2 are 3,023 per annum, which is in line with projected average annual output estimated in our submission to the Issues Paper document. We welcome recognition that this level of dwelling output will be required if the projected population growth rate for Cork City is to be achieved.

It will be challenging to achieve the targets, particularly considering the impacts of the Covid-19 pandemic. Nonetheless the CIF looks forward to working with Cork City Council and other stakeholders to grow Cork in line with growth targets.

Continued monitoring of the delivery of the housing supply targets will be essential to ensure that Cork City is on track to achieve the ambitious growth targets set in the NPF and RSES. The construction industry is entering a period of considerable upward pressure on costs associated with labour and raw materials, with the impacts of Brexit and Covid-19 providing volatility and uncertainty to the market. Linesight's Ireland Handbook 2021¹ reports that Brexit has resulted in:

"...Supply chain issues and associated costs, certification and risk allocation of contracts is undoubtedly challenging. We are seeing significant increases in the cost of key materials such as steel, insulation and timber, largely driven by increase logistics costs and supply chain constraints." (p.15)

The report notes that the impact of Covid-19 has been both far-reaching and significant, and it likely to impact the domestic economy and labour market for the foreseeable future. Labour and material inflationary pressures threaten the viability of developments and the affordability of housing coming to the market. It is therefore critical that the planning policy framework actively facilitates and enables development to support the viability and affordability of residential and commercial output, including:

- Ensuring that sufficient residential and employment land is available to meet market demands.
- Facilitating the delivery of infrastructure to ensure lands are serviceable.
- Having regard to market demands in the context of density requirements.
- Ensuring planning gain requirements on developments are balanced and equitable having regard to the benefits to new and existing residents

¹ Ireland Handbook 2021, Construction Trends & Insights, Linesight



2 Residential Land

The CIF welcome the approach of the draft City Development Plan to retain the residential zoning status of most of the land previously zoned in the Cork City Development Plan 2015 – 2021 (2015) CDP and the relevant Cork County 2017 Local Area Plans (2017 LAPs). It is noted that the zoned land has been categorised into Tier 1 (serviced), Tier 2 (serviceable within lifetime of the development plan), Tier 3 (long term residential lands) and Tier 4 (long term strategic regeneration).

The CIF support the provision in the dCDP that Tier 3 lands may be brought forward during the lifetime of the plan in exceptional circumstances. Ensuring that there is a strategic provision for zoned lands is vital to provide certainty to the development process and to avoid constraining land supply, which would lead directly to increases in the purchase price of zoned lands. Objective ZO 3.2 provides that Tier 3 lands may be brought forward in exceptional circumstances. While this policy is supported, there is a need for some further qualification to ensure the implementation of the policy is not unduly restrictive. There are two considerations here, related to capability and proximity.

Capability: While zoned lands are often technically capable of being developed in terms of policy and infrastructure provision, there may be other reasons, such as landownership, or access to finance that they are not being brought forward. The dCDP applies a yield of 80% to Tier 2 sites to “...capture more realistic delivery up to 2028”. The CIF consider that this yield is unlikely to be realised within the lifetime of the development plan and that there is a need for ensure flexibility to respond to residential lands not being released onto the market for development.

Proximity: Each category of zoned land is distributed throughout the city boundary. The assessment of the whether lands are being brought forward should be assessed on an area basis, rather than the overall quantum / city basis.

Taking the above considerations into account it is submitted that Objective ZO 3.2 is amended as follows:

- (i) *that Tier 1 and Tier 2 serviced or serviceable lands zoned for residential uses, **within the vicinity of comparable Tier 3 lands**, are not ~~capable~~ of being delivered during this Development Plan period, and*
- (ii) *how the proposed development lands will be serviced during this Development Plan period.*



3 Brownfield / Infill Land

The CIF welcome the recognition in the dCDP that increasing the supply of housing on brownfield sites is challenging for a variety of reasons, including site constraints, complexity, and viability. It is noted that the Objective 3.4 provides an ambitious objective for seeking to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork and a series of active land management measures are outlined to detail how this is to be achieved.

While the development of brownfield lands and active land management are laudable objectives, the CIF consider that there is currently insufficient experience, resources, and financial framework in Ireland to deliver the quantum of output sought by the NPF. The CIF has consistently called for a more realistic, transitional approach to the target output on brownfield lands, because an over-reliance on this policy will result in a lack of supply of zoned lands. Clear incentives, including tax incentives, demonstration projects, willingness to use CPO powers and adequately resourced 'Active Land Management Units' are all required if we are to come anywhere close to achieving 33% of housing output on brownfield lands during the next 6-year period.

The CIF recognise that national policy is informing local policy objectives on brownfield lands and note that a City Capacity Study was undertaken to assess the capacity of lands, including greenfield, brownfield and infill sites. However, the Capacity Study was not included in the suite of supporting documents published for consultation and therefore the CIF are not able to comment on the detail and its conclusions.

The CIF remain of the view that the objective of achieving 33% of output on brownfield / infill sites over the lifetime of the development plan is unrealistic and request that the Objective 3.4 includes a commitment to monitoring output, revising targets, and zoning additional residential lands if necessary. The following amendment is requested:

*Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork. **The delivery of new homes within brownfield sites will be actively monitored to ensure that no shortage of land supply occurs during the period of the development plan.***

4 Distribution of Core Strategy Targets

The Core Strategy provides an allocation of 11.2% of total growth in Cork City to the City Docks by 2028, with a target output of 2,238 residential units. This is an extremely ambitious target and the CIF consider that it is unachievable within the projected timelines.



The draft CCDP sets out extensive infrastructure requirements to deliver the development in the City Docks and recognises that existing Seveso industries need to be relocated to unlock the full development potential. The draft CCDP itself recognises that the targets for the City Docks may not be achieved, stating in section 10.128:

*The actual timing for the completion of each tranche will be subject to wide variety of factors. Cork City Council's target it to achieve the build-out of the City Docks between 2021 and 2040 **but recognises that this may not be achievable.** (Emphasis added.)*

Historically, unrealistic growth targets for the City Docks have limited investment and zoning of lands elsewhere in the city, resulting in a shortage of available and deliverable land. Given the robust growth targets for Cork, and the continuing and growing crisis in the availability of housing, it is incumbent on the City Council to ensure that lands allocated in Tier 1 and Tier 2 will deliver development by 2028.

The CIF therefore submit that:

The Core Strategy target for the City Docks of 11.2% of Total Growth by 2028 should be revised downward given the ongoing constraints to delivering units in the Docklands. A corresponding higher growth target should be allocated to the City Suburban areas. Targets set for the City Docks should be kept under continual review during the lifetime of the Development Plan. Any shortfall in delivery of units in the City Docks should be addressed by bringing forward Tier 3 lands in the City Suburbs.

5 Employment Land

We note that the Cork City Strategic Employment Locations Study was published on the City Council website on 16th September as part of the public consultation process. The late publication of this document has prevented a detailed analysis of its findings and conclusions. Nonetheless, the CIF broadly support its findings and welcome the policy approach in the dCDP to identify seven new Strategic Employment Locations and provide a greater distribution of employment lands throughout the city. The principle of promoting higher density mixed use developments is also supported.

6 Commercial Parking Standards

The car parking standard proposed in the draft CCDP represent a significant change in the standards from the 2015 City Development Plan and have serious implications on the ability of Cork to attract commercial development. The current car parking standard for offices in Cork City is a maximum of 1 space per 200 sqm of floor space. The draft CCDP proposes to amend this to 1 space per 500 sqm, reducing the potential car parking provision by over half. The CIF support the objectives for a modal shift to high-capacity public transit, which will enhance the commercial attractiveness of Cork City Centre and make the city a more sustainable environment.



However, the mass transit envisaged for Cork City will not be implemented until well beyond the timeline of the forthcoming Development Plan. It is premature and counter productive in terms of economic growth strategies to put in place parking policies based on the assumption of a high performing public transport system that does not yet exist.

Cork City is being asked to compete with Dublin and provide a realistic alternative for economic and population growth. Dublin has the existing benefit of excellent public transport connectivity, which is far exceed provision in Cork. To attract commercial development during the lifetime of the forthcoming Development Plan, Cork City must be attractive to the market. While the potential delivery of existing high-capacity public transit in the medium to long term will be a factor in the decision-making process for inward investors, the determining factor will be how businesses can operate in the immediate term. Flexibility in the provision of car-parking for new commercial developments is necessary to help attract inward investment to Cork.

The CIF therefore submit that a transitional phase should be applied to the proposed car-parking standards for new office developments. It is submitted that the forthcoming City Development Plan should retain the current standard of 1 parking space per 200 sqm for office developments. A provision could be included in the Development Plan that car parking above the target of 1 space per 500 sqm will be permitted on a temporary basis for a period of 10 years and that, subject to implementation of proposed public transport improvements, these spaces should then be discontinued. This would provide a flexible, transitional policy which would be consistent with national planning objectives for a modal shift to public transport use, but not put Cork City at a commercial disadvantage pending the implementation of proposed improvements.

7 Infrastructure Provision / Implementation

As noted in our submission to the Issues Paper, the CIF recognise that infrastructure investments require co-ordination of priorities across several different Government Departments and agencies, particularly Transport Infrastructure Ireland; National Transport Authority; and Irish Water. It is frustrating that the spatial development objectives of Planning Authorities are not always fully supported by infrastructure investment priorities of state agencies.

The dCDP details the importance of infrastructure led development and the need for sustained co-ordination with relevant stakeholders to achieve the objectives of the Core Strategy. Nonetheless, the draft plan is light in detail on how delivery of infrastructure is to be co-ordinated. It is stated on p. 543 that a Docklands' Delivery Office is being established in partnership with the Land Development Agency to co-ordinate the development of the Docklands. However, there is no commitment for a Delivery Unit to promote the Active Land Management of Tier 1 and 2 lands, or brownfield lands, elsewhere in the city. There is a commensurate need for a focus on implementation and delivery throughout the city if the Core Strategy Growth targets are to be delivered.



The CIF submit that the dCDP should provide a commitment to the development of a well-resourced Implementation Unit to promote the Active Land Management of residential lands throughout Cork City.

In situations where there is a deficit in wastewater infrastructure, a developer led solution can provide development capacity, pending future investment by Irish Water. It is noted that Objective 9.3 of the dCDP states that:

Residential development that requires the provision of private wastewater treatment facilities (i.e., Developer Provided Infrastructure), other than single house systems will generally not be permitted.

The CIF consider that this provision is unduly restrictive and could prevent otherwise viable lands being brought forward during the lifetime of the development plan. The option of developer led wastewater treatment facilities should be permissible if the proposed solution is acceptable to Irish Water. We therefore request that Objective 9.3 is amended to read:

Unless approved by Irish Water, residential development that requires the provision of private wastewater treatment facilities (i.e., Developer Provided Infrastructure), other than single house systems will generally not be permitted.

6 Building Heights and Density

6.1 Height

In the present market, the viability for tall residential developments in Cork City is limited and the CIF welcome the fact that there will not be a requirement for significant increases in height throughout the city. However, we consider that the policy approach in the dCDP is unduly restrictive to respond to site specific opportunities, or market changes that may occur during the lifetime of the development plan. Prescriptive policies in respect of building heights restrict the capacity of developers to respond to site specific opportunities and market demands.

We have not had the opportunity to fully appraise the Cork City Urban Density Building Height and Tall Building Study (Density & Height Study) which has informed the dCDP strategy on building height and density, as it was only made available for review on 16th September. It would, however, seem that the Density & Height Study has taken a conservative approach to the potential for tall buildings to be considered. In line with SPPR3 of the Building Height Guidelines 2018, tall buildings should be permitted where it can be demonstrated that a proposal complies with development management criteria in terms of its appropriateness:

- At the scale of the relevant city / town
- At the scale of the district / neighbourhood / street
- At the scale of the site / building



The Density & Height Study states that:

Tall Buildings however will only be appropriate in a very limited number of locations. Meeting the acute housing needs of the city will require higher density developments across many parts of the city, not just those which might be more suitable for tall buildings. It is therefore important to devise an approach to building heights across the Cork City Council administrative area as a whole. Establishing a range of appropriate building heights across all areas will help to ensure the best use of land is made, particularly in locations considered appropriate for higher density development.

...

The urban character of Cork is varied and complex. Tall can only therefore be understood as a relative term when we consider the whole of the administrative area of Cork City. Policies relating to building heights should acknowledge this.” (p.55)

This position is reflected in paragraph 11.51 of the dCDP, which states that:

Tall buildings should only be developed in suitable locations identified in the development plan. Tall buildings outside of the location specified are not generally considered to be appropriate as they would likely conflict with the overall building height strategy for Cork.

This statement conflicts with provisions of the Building Height Guidelines 2018, which provide:

There is therefore a presumption in favour of buildings of increased height in our town / city cores and in other urban locations with good public transport accessibility.

The CIF submit that the Tall Building strategy in the dCDP should be reviewed to be less prescriptive in terms of the suitability of locations. We submit that the principles set out in paragraph 11.51 should be amended as follows:

*Tall buildings ~~should only be developed in~~ **will be supported and encouraged in** suitable locations identified in the development plan. Tall buildings outside of the location specified **should demonstrate compliance with development management criteria as set out in SPPR3 of the Building Height Guidelines 2018.** ~~are not generally considered to be appropriate as they would likely conflict with the overall building height strategy for Cork.~~*

6.2 Density

In general terms, the CIF support the dCDP strategy for increased density to have regard to the context of their surroundings and welcome the recognition that there should be a range of density levels within Cork City to respond to different household demand. However, we consider that the density levels required throughout the city boundary do not provide sufficient flexibility to respond to market demands for family style housing.



As we stated in our submission to the Issues Paper, there is an established market resistance to higher density developments and particularly apartment developments in locations outside the core of the City centre. The impacts of Covid-19, the need for social distancing and collective memory of the lockdown will serve to strengthen this market resistance in the short to medium term. We noted that density objectives outside the City Centre and Docklands areas should provide for an appropriate range, to ensure sustainability and viability in terms of market demands. The balance between the number of apartments / duplex units required in a development shift dramatically around the density of 32 / 33 units per hectare. Density levels of 30 to 32 units per hectare can be achieved with a mix of 70% to 80% housing and 20% to 30% apartments / duplex units. Achieving a density of 33 units per hectare and above requires a considerable shift in the balance towards apartments / duplex units of around 50% or over. This balance of apartments / duplex units is not reflective of the demographics or market demands in Cork outside the City Centre and Docklands areas.

We reiterate our position that there is a continued need to provide new housing suitable for families within the city boundary and to support home-working trends and that:

- Outside the City Centre, Docklands and public transport corridors, development areas in Cork should have a general density range of 30 to 35 units per hectare.
- Within public transport corridors, while there should be no upper limit on density, densities in the range of 35 to 50 units per hectare should be considered, where it can be demonstrated that developments are contributing to self-sufficient neighbourhoods and / or supporting home-working trends.

7 View Management Framework

The View Management Framework set out in the dCDP looks to be based primarily on the landscape study that informed the 2009 Cork City Development Plan. This framework provides for several protected views and prospects throughout the city and has informed the identification of locations suitable for tall buildings. However, there does not appear to have been any detailed reappraisal of the landscape study to take account of:

- The national planning policy framework for Cork, which provides for strong compact growth to 2040.
- The Building Height Guidelines 2018, which provide for a presumption in favour of tall buildings.
- Developments that have taken place since 2009 and have changed the view framework of Cork City.

The CIF agree that Cork City offers a visually striking landscape and that it is important to retain the elements of the city that make it a unique and attractive place to live and work.



Nonetheless, there is a need to recognise that the strong growth objectives for the city cannot be achieved without impacting the existing landscape character of the city and that new development can provide positive strategic and local landmark buildings.

The CIF submit that Objective 6.10 should be amended to ensure that focus of the forthcoming City Landscape Strategy is on how to facilitate growth within Cork, while maintaining a positive landscape character. The following revised objective is suggested:

Cork City Council will undertake a City Landscape Strategy during the life of this Plan, which will consider how strong growth objectives can be achieved while having regard to the value of the existing landscape, its character, distinctiveness, and sensitivity. The Landscape Strategy will consider the potential of development to provide new landmark opportunities.

8 Development Management Requirements

The dCDP introduces several new development management requirements on new residential developments, including:

- Developments of more than 50 required to comply with dwelling size mix.
- Developments of more than 100 houses will be required to provide a Community Infrastructure Assessment and address deficiency on-site.
- All developments with flat or gently sloping roofing will be encouraged to incorporate green roofs or solar panels, with solar panels having priority.
- All future planning schemes of 50 or more homes (or 1,000 sqm of commercial space) in the Docklands, Tivoli or CSIP will be required to be supported by an assessment of district heating opportunities.

The CIF recognise the need for responding to development issues related to climate change and social structures (such as housing mix and community infrastructure). Nonetheless, there is a need for balance in measures sought to be applied to individual proposals to ensure that the viability of developments is not compromised.

In the context of the housing mix requirement, there should be flexibility for developments to provide an alternative mix of units, if it is re-addressing an existing area of homogenous house types / sizes. It is therefore submitted that Objective 11.2 should be amended as follows:

*All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances, **such as providing balance to an existing area of homogenous dwelling types / sizes.***



New residential developments already have planning gain / development contribution levied on them related to Part V housing, provision of creche facilities, general and special contributions, all of which impact the viability and affordability of new housing. Provision of community infrastructure within new developments should be commensurate with the requirements generated and should not be used to address deficits in the wider environs.

Should additional community infrastructure be provided by agreement with a developer there should be an appropriate offset in development contributions. The CIF submit that paragraph 11.160 of the dCDP should be amended as follows:

*Development proposals for 100 or more homes will be required to prepare and submit a Community Infrastructure Assessment (CIA) in support of the planning application. It should assess the impacts of the development proposals on community infrastructure and where there is a deficit in community infrastructure having regard to existing or committed capacity improvements with the City Neighbourhood or larger catchment as the case may be depending on the type of infrastructure, the development proposals will be encouraged to address the deficiencies through on-site provision. Community facilities, **commensurate with the requirements generated by the new housing**, will be required to be provided in tandem with the development of large new residential areas. **An off set on development contribution requirements may be considered for the provision of additional community facilities which addresses a general deficit in the neighbourhood or catchment.***

9 Implementation

As noted in section 5 of this submission, the CIF consider that there is a need for Cork City Council to establish an Implementation Delivery Unit to promote the Active Land Management of Tier 1 and 2 lands, or brownfield lands, throughout the city.

We also note that the dCDP states in paragraph 1.14 that City Development Plan objectives may be developed in more detail at a local level through local area plans, framework plans, or development briefs, and that there is reference to the need for framework plans for several development areas, including:

- Blackpool / Kilbarry,
- Ballyvolane and
- Douglas
- South Ballincollig
- South Glanmire
- Blarney
- Stoneview
- Tramore Road / Kinsale Road,
- Hollyhill District Centre



No clarification is given in dCDP on the timeline for development of the Framework Plans, or what level of development may proceed in advance of their preparation. It is important that development potential of sites is not constrained pending the preparation of a series of local level Framework Plans. Clarity should be provided in the dCDP that development proposals will be considered prior to the preparation of Framework Plans by the Council, subject to developers providing an urban design framework to demonstrate how proposals sit within the context of the immediate neighbourhood. It is submitted that paragraph 1.14 of the dCDP should be amended as follows:

*Where appropriate, the City Development Plan objectives may be developed in more detail at a local level. This may be through local area plans; framework plans or development briefs. These will be prepared as the need arises and resources allow. **Where the need for a Framework Plan or development brief is identified in this plan, development proposals will be considered in the context of the submission of a developer led urban framework plan, as part of a planning application.***

10 Summary

The CIF welcome the opportunity to make this submission to the draft Cork City Development Plan 2002 – 2028 and look forward to working with Cork City Council as a key stakeholder in achieving the growth targets of the Core Strategy.

To achieve growth targets, it is critical that the planning policy framework actively facilitates and enables development to support the viability and affordability of residential and commercial output, including:

- Ensuring that sufficient residential and employment land is available to meet market demands.
- Facilitating the delivery of infrastructure to ensure lands are serviceable.
- Having regard to market demands in the context of density requirements.
- Ensuring planning gain requirements on developments are balanced and equitable having regard to the benefits to new and existing residents

The CIF submit that:

- To avoid a shortage of residential lands occurring during the lifetime of the development plan, Objective ZO 3.2 is amended, as follows:

*That Tier 1 and Tier 2 services or serviceable lands zoned for residential uses, **within the vicinity of comparable Tier 3 lands**, are not ~~capable~~ of being delivered during this Development Plan period, and*

- To further avoid a shortage of residential lands occurring during the lifetime of the development plan, Objective 3.4 is amended, as follows:



Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork. **The delivery of new homes within brownfield sites will be actively monitored to ensure that no shortage of land supply occurs during the period of the development plan.**

- The Core Strategy target for the City Docks of 11.2% of Total Growth by 2028 should be revised downward given the ongoing constraints to delivering units in the Docklands. A corresponding higher growth target should be allocated to the City Suburban areas. Targets set for the City Docks should be kept under continual review during the lifetime of the Development Plan. Any shortfall in delivery of units in the City Docks should be addressed by bringing forward Tier 3 lands in the City Suburbs.
- The dCDP should retain the current standard of 1 parking space per 200 sqm for office developments. A provision could be included in the Development Plan that car parking above the target of 1 space per 500 sqm will be permitted on a temporary basis for a period of 10 years and that, subject to implementation of proposed public transport improvements, these spaces should then be discontinued.
- The dCDP should provide a commitment to the development of a well-resourced Implementation Unit to promote the Active Land Management of residential lands throughout Cork City.
- To allow some flexibility in resolving wastewater infrastructure constraints, Objective 9.3 is amended as follows:

Unless approved by Irish Water, residential development that requires the provision of private wastewater treatment facilities (i.e., Developer Provided Infrastructure), other than single house systems will generally not be permitted.

- To be compliant with national guidelines, the Tall Building principles set out in paragraph 11.51 are amended as follows:

~~Tall buildings should only be developed in~~ ***will be supported and encouraged in*** suitable locations identified in the development plan. Tall buildings outside of the location specified ***should demonstrate compliance with development management criteria as set out in SPPR3 of the Building Height Guidelines 2018.*** ~~are not generally considered to be appropriate as they would likely conflict with the overall building height strategy for Cork.~~

- There is a continued need to provide new housing suitable for families within the city boundary and to support home-working trends and that:
 - Outside the City Centre, Docklands and public transport corridors, development areas in Cork should have a general density range of 30 to 35 units per hectare.



- Within public transport corridors, while there should be no upper limit on density, densities in the range of 35 to 50 units per hectare should be considered, where it can be demonstrated that developments are contributing to self-sufficient neighbourhoods and / or supporting home-working trends.
- That Objective 6.10 should be amended to ensure that focus of the forthcoming City Landscape Strategy is on how to facilitate growth within Cork, while maintaining a positive landscape character. The following revised objective is suggested:

Cork City Council will undertake a City Landscape Strategy during the life of this Plan, which will consider how strong growth objectives can be achieved while having regard to the value of the existing landscape, its character, distinctiveness, and sensitivity. The Landscape Strategy will consider the potential of development to provide new landmark opportunities.
- To allow for the housing mix within a development to provide balance to an existing area of homogenous dwelling types / sizes, Objective 11.2 be amended as follows:

*All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances, **such as providing balance to an existing area of homogenous dwelling types / sizes.***
- To ensure that the provision of community infrastructure within new developments is commensurate with the requirements generated by the proposals, paragraph 11.160 of the dCDP be amended as follows:

*Development proposals for 100 or more homes will be required to prepare and submit a Community Infrastructure Assessment (CIA) in support of the planning application. It should assess the impacts of the development proposals on community infrastructure and where there is a deficit in community infrastructure having regard to existing or committed capacity improvements with the City Neighbourhood or larger catchment as the case may be depending on the type of infrastructure, the development proposals will be encouraged to address the deficiencies through on-site provision. Community facilities, **commensurate with the requirements generated by the new housing,** will be required to be provided in tandem with the development of large new residential areas. **An off set on development contribution requirements may be considered for the provision of additional community facilities which addresses a general deficit in the neighbourhood or catchment.***



- Paragraph 1.14 of the dCDP should be amended as follows, so that the development potential of sites is not constrained pending the preparation of a series of local level Framework Plans:

*Where appropriate, the City Development Plan objectives may be developed in more detail at a local level. This may be through local area plans; framework plans or development briefs. These will be prepared as the need arises and resources allow. **Where the need for a Framework Plan or development brief is identified in this plan, development proposals will be considered in the context of the submission of a developer led urban framework plan, as part of a planning application.***

Thank you for the opportunity to comment on the CDP review process and for taking the time to consider this submission.

Yours sincerely,



Conor O'Connell

DIRECTOR – SOUTHERN REGION

