

Submission to Draft Cork City Development Plan 2022-2028

For Development at Vienna Woods Hotel, Glanmire,
Cork

on behalf of Pallas Taverns Ltd.

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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Pallas Taverns Ltd., in response to public notices inviting submissions from third parties and interested parties on the Cork City Development Plan review in accordance with section 12(2)(b) of the Planning and Development Act 2000. Our client welcomes the publication of the Draft Cork City Development Plan 2022-2028 and the opportunity to participate in the plan making process which will inform the future development of Cork City. Accordingly, this submission requests the following provisions in the forthcoming CDP for Glanmire:

- Amendment of draft Zoning Map 05 to remove our clients' lands from the Landscape Preservation Zone and zone the lands as ZO1 Sustainable Residential Neighbourhood.
- Amendment of the landscape policies contained in the forthcoming CDP to have regard for national and regional planning policy which promotes compact and sustainable growth within urban areas within/close to the existing built-up area, on brownfield land or infill sites.

This submission is structured as follows:

- Site Context
- Planning Policy
- Rationale for Submission Request
- Conclusion

2. Site Context

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

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

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

Set within the townland of Lotamore, Glanmire, Co. Cork, the subject site is situated to the west of the R639 Glanmire Road with the Glashaboy River beyond. The extensive site is home to the well-established Vienna Woods Hotel, a protected structure (RPS ID 00474), which lies to the south of the site and a small number of private residences, 8 no. dwellings of which were previously used as holiday home for short-term letting, that lie to the west of the site. The remainder of the site is covered in extensive woodland. The site is accessible via an existing entrance situated on the R639.



Fig 1: Location of Site at Lotamore, Glanmire, Cork.

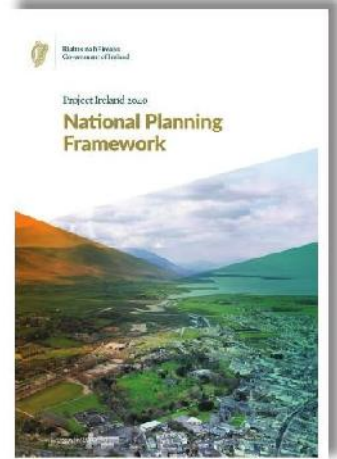
Vienna Woods first opened its doors in 1963 and has been in operation as a hotel ever since. The hotel is a family run business and has been providing employment in the Glanmire area since the opening of the hotel. Over the years the hotel has seen some expansion, with the most recent expansion project being granted by Cork City Council under Ref. 21/40113.

3. Planning Policy Context

3.1 National Planning Framework – Project Ireland 2040

In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027. These plans aim to achieve balanced regional development by outlining a clear hierarchy for the urban centres outside the greater Dublin area, with Cork being promoted as the State's second city, fulfilling a nationally important role in counterbalancing the Capital.

The NPF provides a policy framework for the future development of Ireland, taking into account a projected 1 million increase in the Country's population, the need to create 660,000 additional jobs to achieve full employment and a need for 550,000 more homes by 2040.



National Policy Objective 6 states that “...cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area should be regenerated and rejuvenated.”

It is a goal of the NPF to enhance amenities and heritage as:

“This will ensure that our cities, towns and villages are attractive and can offer a good quality of life. It will require investment in well-designed public realm, which includes public spaces, parks and streets, as well as recreational infrastructure. It also includes amenities in rural areas, such as national and forest parks, activity-based tourism and trails such as greenways, blueways and peatways. This is linked to and must integrate with our built, cultural and natural heritage, which has intrinsic value in defining the character of urban and rural areas and adding to their attractiveness and sense of place”.

A core objective of the National Planning Framework is to build an average of 25,000–30,000 new homes annually to meet future planned needs of the population and deal with the demand-supply imbalance over recent years, in effect a doubling of annual housing output from 2016/2017 levels. According to the National Development Plan, Cork is expected to increase its population by 125,000 by 2040, which will require the provision of additional housing to accommodate 2,400 people every year up to 2040.

The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. According to the NDP, a key tenet to achieving these ambitious housing targets

is through compact growth. This compact growth model focuses on the prioritisation of housing development in locations within and contiguous to existing urban footprints where it can be served by public transport, walking and cycling.

Key Facts and Figures:

- The Population of Ireland will increase by around one million people or by 20 % over 2016 levels by 2040;
- The population aged over 65 will more than double; and
- Need for at least an additional half a million new homes by 2040.

Compact Growth Objectives:

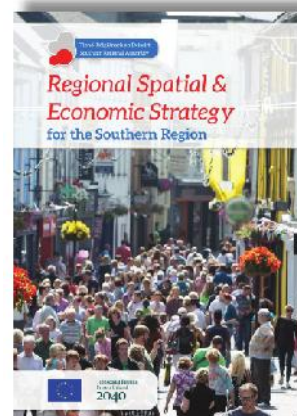
- Targeting a greater portion (40 %) of future housing development to be within and close to the existing 'footprint' of built-up areas; and
- Future homes are required to be located where people have the best opportunities to access a high standard quality of life.

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

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

RSES describes Glanmire as a:

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



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

Section 6.6 of the RSES notes that tourism plays a vital role in both the economy and enhancing the quality of residents, employees and visitors to Cork.

Regional Policy Objective, RPO 51, on 'Tourism' states that it is an objective of the RSES to:

"Enhance provision of tourism and leisure amenity to cater for increased population in the Region including recreation, entertainment, cultural, catering, accommodation, transport and water infrastructure inter alia;

Promote activity tourism;

Sustainably develop the road network and public transport services and facilities for improved visitor access, longer dwell times due to improved connectivity to ports and airports and tourism growth;

Sustainably develop walking and cycling trails opening greater accessibility to the marine and countryside environment by sustainable modes and promote the sustainable designation and delivery of Greenway and Blueway Corridors.

Facilitate appropriate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, prioritising sustainable projects that achieve maximum impact and connectivity at national and regional level;

Identify and map catchment areas concerning Culture, Heritage and Tourism of regional significance/scale. Such catchments should have the potential to deliver small scale economic development and using wider local services such as Post Offices and local public transport.

Support the relevant authorities in the development of specific monitoring protocols for visitor pressure to ensure that tourism activities are maintained within sustainable limits for the European sites in the region”.

3.3 Cork County Development Plan 2014

The Cork County Development Plan 2014 identifies the proposed site as being located within the Metropolitan Greenbelt Area. Objective RCI 5-1 of the CDP 2014 provides the following guidance with regard to development in the greenbelt:

“Maintain the Metropolitan Cork Greenbelt (as shown on Figure 4.1 in this Plan) which encompasses the City and its suburbs together with the satellite towns, villages and countryside of Metropolitan Cork.”

This designation was formally known as A3 Greenbelt under the CDP 2009. Although it is an objective to preserve these areas from development, Objective RCI 5-6 recognises that there have been long established commercial uses within the Greenbelt and that naturally, these businesses may need to expand to meet future demands. Objective RCI 5-6 states the following:

“Recognise the requirements of long established commercial or institutional uses located entirely within the Greenbelt which may make proposals for expansion / intensification of existing uses. Such expansion proposals of an appropriate scale would only be considered in special circumstances, having regard to the overall function and open character of the Greenbelt and where development would be in accordance with normal proper planning and sustainable development considerations.”

The Vienna Woods Hotel is identified as a Protected Structure in the Cork County Development Plan 2014, RPS ID – 00474.

Chapter 8 of the CCDP 2014 focuses on Tourism and states that the overall aim is to:

“Promote a sustainable and well managed tourism industry with associated economic benefits throughout the County. Identify and develop new and diverse tourism products - particularly those associated with heritage and environment, arts and culture and acknowledge the need to spread appropriate tourism growth and tourist related enterprises beyond established resorts and larger towns to rural areas.”

Chapter 8 states that the sustainable development and promotion of a successful well managed tourism industry is critical to the economy of County Cork and summarises the main aims of the CCDP 2014 as follows:

“Develop, enhance and protect new and existing tourism assets, products, attractions and tourism infrastructure;

Maximise the tourism diversity of the County and promote sustainable tourism related development;

Develop strong, year-round, high quality integrated tourist products and promote the potential of underdeveloped areas for tourism”.

The CCDP 2014 notes that it is a policy to “facilitate the development of the tourism sector and provide for the delivery of a unique combination of tourism opportunities drawing on the network of attractions in Cork County and potential future attractions”. (Policy TO 1-2)

The CCDP further recognises that tourism can generate great benefits to the local economy and that it is important to provide tourists with well maintained and good quality accommodation to encourage longer stays. The plan also acknowledges that improvement may be required where necessary. Policy objective TO 10-1 states as follows:

“Encourage holiday accommodation to locate within established settlement boundaries and that such development relates sympathetically to the scale and level of development and facilities in the locality.”

The CDP 2014 also recognises that some developments are not suited to be in a city and are suitable for development within the Greenbelt.

“RCI 5-7: Strategic and Exceptional Development

Recognise that there may be development of a strategic and exceptional nature that may not be suitably located within zoned lands and that such development may be accommodated successfully in Greenbelt locations. In such circumstances, the impact on the specific functions and open

character of the Greenbelt should be minimised. During the lifetime of the plan consideration will be given to the establishment of a Showgrounds, and ancillary facilities, located on the Munster Agricultural Society grounds, at Curraheen."

The site lies just outside the development boundary for Glanmire. Under Objective ZU 2-3, Land Use Zoning of Other Lands, of the Cork County Development Plan 2014, it is an objective of the plan that:

"Where lands have not been explicitly zoned, in either the adopted Local Area Plans or the adopted Special Local Area Plans, the specific zoning shall be deemed to be that of the existing use of the lands (if such a use is not an unauthorised use under the Planning Acts) or, if such a use is unauthorised, that of the most recent authorised use of the lands."

3.4 Draft Cork City Development Plan 2022-2028

The Draft Cork City Development Plan (CDP) sets out Cork City Council's policies for the development of Cork City to 2028 and beyond. It establishes the following vision for Cork City:

"The Strategic Vision is for Cork City to take its place as a world class city, driving local and regional growth, embracing diversity and inclusiveness and growing as a resilient, healthy, age-friendly and sustainable compact city with placemaking, communities and quality of life at its heart."

In the Draft CDP Glanmire is identified as one of the four 'Urban Towns'. The Role in the Core Strategy of the Urban Towns is as follows:

"Phased delivery of strategic sites by targeting growth proportionate to the existing population within the four urban towns. All development shall focus on prioritising walking, cycling and public transport use. Apply a mixed-use approach to regenerating key underutilised locations. Use a range of designs and densities that reflect and enhance the individual character of each town."

Our clients' lands are situated outside the development boundary of Glanmire town and are zoned ZO 18 Landscape Preservation Zone where the following objective applies:

"To preserve and enhance the special landscape and visual character of landscape Preservation Zones."

Section ZO 18.1 of the draft plan goes on to state that:

"These areas have been identified due to their sensitive landscape character and are protected due to their special amenity value, which derives from their distinct topography, tree cover, setting to historic structures or other landscape character."

With regards development of these sites, Section ZO 18.2 of the draft plan states:

"Many of these sites have limited or no development potential due to their landscape character. There is a presumption against development within this zone, with development only open for consideration where it achieves the specific objectives set out in Chapter 6 Green and Blue Infrastructure, Open Space and Biodiversity."



Fig 2: Subject Lands outlined in red.

The Vienna Woods Hotel is identified as a Protected Structure in the Draft Cork City Development Plan, RPS ID PS1188. Objective 8.9 of the draft Plan states that the Council will:

"Maintain a Record of Protected Structures (RPS) which shall include structures of parts of structures which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and which is it an objective to protect..."

It is an objective of the plan to attract more leisure tourists to Cork City. Section 7.75 of the plan states that *"that availability of a choice of visitor accommodation across a range of accommodation types is a key enabling factor in fostering tourism growth As the city's demographic expands with the commensurate increase in economic growth, there is likely to be more demand for accommodation to support commercial and leisure tourism and this will need to be supported by visitor accommodation growth into the future."*

3.5 Local Planning Policy relating to Landscape Preservation Zones

Landscape, while addressed in previous Cork City Development Plans (CDP), was first afforded proper protections via the introduction of a series of dedicated policies in the Cork City Development Plan 2004. This included the identification

of areas in need of protection due to their sensitive character, identified in the plan as 'Landscape Protection Zones'. Table 1.8 of the plan identified the four different categories as follows:

- A. *Visually important land, including land forming the setting for existing landmark buildings.*
- B. *Land with amenity value which has potential for development as open space.*
- C. *Areas with existing woodlands or significant tree groups, or areas with potential for new woodlands.*
- D. *Areas which provide a habitat for wild flora and fauna.*

The CDP 2004 stated that there was a general presumption against development in these zones, unless it could be demonstrated by means of a landscape assessment and appropriate landscape and building design proposals that any proposal would protect and enhance the overall character of the site and its visual context.

'Landscape Preservation Zones' (LPZ) were first introduced in the CDP 2009 following a series of recommendations contained in the Cork City Landscape Study (CCLS) 2008 by Mitchell and Associates. While the CCLS, which was prepared to inform the review of the previous CDP 2004, made no specific reference to the introduction of such preservation areas, this revised policy approach was introduced which identified LPZs as specific areas to be **preserved rather than protected**. The LPZ policy included in the previous CDP 2009 read as follows:

"To preserve and enhance the special landscape character and visual amenity of Landscape Preservation Zones there will be a presumption against development within them. Development will be considered only where it achieves the Specific Objectives set out in Table 10.2." (Policy 10.6)

The policy and supporting text contained in the current CDP 2015 was further revised, taking a similarly conservative approach to development. The specific objective included in the current CDP 2015 reads as follows:

"To preserve and enhance the character and visual amenity of Landscape Preservation Zones through the control of development. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape and achieves the respective site-specific objectives, as set out in Table 10.2." (Objective 10.5)

The supporting text in the plan offers additional insight into the approach that is expected to be taken to development within the LPZs. LPZs are described as "areas in need of special protection as their character and amenity value is considered to be to highly sensitive to development and as such have limited or no development potential" (Para 10.20). This character and amenity value typically combine landscape assets such as topography/slope, tree cover, setting of historic structures / other open spaces and landscape assets. Those assets pertaining to each LPZ are identified clearly in Table 10.2 of the plan.

As a result, it is stated that there is a **general presumption against development** within the LPZs, with any development limited in scope and character to the respective site-specific objectives as outlined in Table 10.2 of the plan, or in exceptional circumstances, there may be limited scope for the adaption of existing structures to cater for evolving occupant requirements (i.e. change of use and/or minor extensions).

There is a total of **64 LPZs** identified in the current CDP 2015, comprising approximately **184.5 hectares** of land within the built footprint of the city.

While this submission relates to the general approach to LPZ's, particular reference is being made to the Vienna Woods Hotel site at Lotamore, Glanmire. This property is a well-established hotel surrounded by residential developments to the west. In 2021, planning permission has been granted for the extension to the existing hotel, Ref. No. 21/40113. Vienna Woods is listed as a Protected Structure (Reference number RPS ID-00474). The subject site did not form part of the 2008 CLS nor was it designated a Landscape Preservation Zone in the current County Development Plan so therefore we would question the justification for the proposed LPZ designation.

Vienna Woods Hotel is located within a designated 'Landscape Preservation Zone'. This zoning is completely at odds with the previous permissions granted on site and would prevent any future expansion/development of the existing hotel. The designation of LPZ's have defined site specific objectives for each zone and the objectives for the Lota Landscape Preservation Zone (NE 18) are as follows:

"This Zone is visually important as it:

- *Forms part of an attractive gateway entrance to the city,*
- *Is home to significant cultural heritage assets in the form of protected structures (including Lota House and Lotabeg House) and scheduled monuments,*
- *Provides setting to Tivoli Docks,*
- *Lies adjacent to the Glashaboy River (Cork Harbour Special Protection Area),*
- *Provides local biodiversity benefit and*
- *Forms part of the wider landscape setting from the southern side of the River Lee.*

There is potential to add to and extend mixed native woodland within and adjoining this zone for both visual landscape and biodiversity benefits. For these reasons, there is a pre-sumption against development within this zone."

4. Planning History

There are 9 no. applications / permission relating to the subject site. These are outlined below.

[Cork County Council Ref. No. 03/3401](#)

On the 2nd September 2003, planning permission was granted to John and Darina Gately for the construction of a dwelling house and waste water treatment unit at Lotamore, Glanmire, Co. Cork. This permission was never constructed.

[Cork County Council Ref. No. 04/9694](#)

On September 19th 2005, John Gately was granted permission for the construction of 8 no. two storey holiday homes for short term letting by Cork County Council at The Vienna Woods Hotel, Lotamore, Glanmire subject to 26 no. Conditions. Condition No. 2 set out the following in relation to the proposed development:

The proposed buildings shall be used for self-catering apartments in conjunction with the adjacent hotel and not as individual holiday homes.

[Cork County Council Ref. No. 04/9736](#)

John Gately was again granted permission by Cork County Council for the construction of leisure and fitness centre comprising swimming pools, steam room, sauna, jacuzzi, changing rooms, treatment rooms, aerobic room, yoga room, gymnasium, creche and associated office/utilities accommodation and associated works at The Vienna Woods Hotel, Lotamore, Glanmire on September 19th 2005. The decision was made subject to 27 no. conditions.

This permission was never enacted.

[Cork County Council Ref. No. 07/6693](#)

On the 30th March 2007, Pallas Taverns Ltd., applied for permission for the construction of a single storey extension to the rear and side of existing function room to incorporate new kitchen, storage areas, toilets, new bar area to existing function room and for an increase in floor area of existing function room and associated site works. This was granted by Cork County Council on 8th October 2007. The decision was made subject to 45 no. conditions.

[Cork County Council Ref. No. 09/4170](#)

Following on from this, in November 2009, Michael Magner was granted planning permission for the construction of a dwelling house at Lotamore, Glanmire, Co. Cork.

[Cork County Council Ref. No. 12/4382](#)

On The 25th April, 2012, Cork County Council granted permission to Michael & Anette Magner for the Construction of two storey side extension, first floor extension, alterations to existing elevations, detached domestic garage and all associated site works to dwelling house on the grounds of Vienna Woods, Lotamore, Glanmire, Co. Cork. This grant was subject to 18 no. conditions.

[Cork County Council Ref. No. 19/5399](#)

On the 13th, November 2011 Cork County Council granted permission to Emma Sheehan for the demolition of an existing dwelling house and the construction of a new dwelling house within the same site. The existing house is currently served by public water and wastewater services which will be reused to serve the new dwelling house. Works also include the extension of the existing driveway to the new dwelling house and all other ancillary site works which are all within the current Vienna Woods estate.

[Cork County Council Ref. No. 19/5380](#)

Pallas Taverns Ltd., applied for permission in May 2019 for a change of use of the 8-no. short term holiday letting dwellings (permitted under Planning Reg. No. 04/9694) to residential dwellings, permission was also sought for the construction of new boundary walls to the dwellings and all associated site works. Permission was granted by Cork county Council on March 19th, 2020.

[Cork City Council Ref. No. 21/40113](#)

On the 28th, July 2021 Cork City Council granted permission to Pallas Taverns Ltd. for extensions to the hotel to provide for 42 no. additional bedrooms, spa and ancillary guest facilities. The permitted development consisted of the construction of 2 no. single storey extensions to the sides of the hotel to provide a lobby and pre-reception/event space, an extension to the existing dining room and additional circulation space, a 3 storey extension over the existing ground floor ballroom to include a spa, guest facilities and terrace at 3rd floor level, retention of the conservatory to the front of hotel and all ancillary site development works including 1 no. ESB substation.





Fig 3: Permitted Development under Ref. 21/40113.

As can be seen from the above images the permitted development have little to no impact on the protected structure or the landscape value of the site. As stated by the area planner in her report dated June 14th, 2021 *"the hotel is set on elevated and wooded lands above Glamire Village, and due to its mature vegetation is only visible in glimpses."* She goes on to state that *"the impact on the wider landscape is negligible, given the mature wooded vegetation the hotel sits within."*

5. Rationale for Submission Request

As highlighted previously, the most recent development plans, including the current CDP 2015, have tended to focus on preserving areas perceived as being of high landscape quality. However, the thrust of national policy, which focuses on compact growth and the realisation of the development potential of currently under-utilised land within our towns and cities, provides scope for broadening the landscape argument for the city. Rather than seeking to preserve these areas of aesthetic quality in their current state, we consider that such areas have the potential to contribute to the sustainable growth and development of the city in a manner that retains the identity of the site while also maintaining the particular landscape characteristics recognised as being worthy of protection

Section 2.30 of the Draft Plan states that the Plan has been based on an evidence-based approach and in the preparation of the plan Cork City Council have “*carried out a series of supporting strategies and studies to provide an evidence based approach, where possible, to reflect on best international practice.*” We would question the evidence-based approach in relation to the identification of the new Landscape Preservation Zones as there does not appear to be any studies or any evidence provided to propose new LPZ’s.

The purpose of this submission is to request that Cork City Council remove our clients’ lands from the Landscape Preservation Zone and zone our client’s entire landholding as **ZO1 Sustainable Residential Neighbourhood**. Our client has a well-established hotel with a number of residential uses on lands in a strategic location within the Urban Town of Glanmire. If Glanmire and Cork City are to deliver on their strategic aims, the strategic planning policy context must support flexible development during the lifetime of the forthcoming Development plan, on lands such as our clients land holding at Vienna Woods Hotel.

The vision for Cork City in the Draft City Development Plan is to:

“take its place as a world class city, driving local and regional growth, embracing diversity and inclusiveness and growing as a resilient, healthy, age-friendly and sustainable compact city with placemaking, communities and quality of life at its heart.”

The inclusion of this land within the LPZ inhibits our client from expanding their business in the future and contributing to the realisation of the vision for Cork City. Therefore, it is requested that the Council modifies the zoning to include our clients lands in the ZO1 zoning.

Our clients land benefits from a well-established use with the Vienna Woods Hotel in operation at this location for 57 years. The hotel provides a service and vital employment for the ‘Urban Town’ of Glanmire. The hotel industry has seen significant negative impacts and loss of business due to the Covid-19 pandemic. The effects of the pandemic will be felt well into the future therefore it is imperative that the hotel sector is supported in the forthcoming plan by ensuring that there is a more flexible and positive approach to development adopted in the plan. To ensure the plan supports the development of these lands it would be beneficial to remove these lands from the LPZ and afford the lands a more

appropriate zoning. Hotel development should be given the opportunity to grow and expand their services and this should be supported in the forthcoming plan.

These lands currently benefit from a mix of uses which include the well-established hotel use as well as 11 no. residential dwellings. It is considered that the site has the capacity to accommodate additional residential uses which could be used as staff accommodation or as private residential units. A more flexible zoning approach to allow for the expansion of residential uses on site would be welcomed. We therefore consider that it is of vital importance to provide clear objectives for the development of these lands. As mentioned previously the hotel is a protected structure which is afforded sufficient protections for the building and its curtilage within the current and draft plan. As mentioned in section 4 above it has been shown that development can be achieved on this site in a sensitive manner. The provision of a Landscape Preservation zoning will be counterproductive in terms of ensuring the longevity of well-established businesses which provide vital employment for the town of Glanmire and the wider area.

It is considered that the Hotel's location in the LPZ will limit the opportunities available for future development. There is no question that the hospitality industry in Ireland has suffered more than most in terms of the impact of Covid-19. It will take time for these businesses to re-establish and changes to public health guidelines may also require additional, unforeseen works to be required. It is considered that in order to ensure the future viability of the Hotel, that Vienna Woods should be recognised as playing an essential economic role in Glanmire in the City Development Plan and this should be reflected in how the site is zoned.

Our client's site is a key development site; it is fully serviceable and readily available for development in the short to medium term. In prioritising zoning of land, the principles of the NPF and RSES should apply in terms of deliverability, accessibility, and consolidation of the existing built environment.

Deliverability

The deliverability of growth is a key principle of the RSES. It is recognised that there is a need to focus on zoning lands which will support investment in infrastructure, public transport improvements and will be brought forward to the market for development.

As stated above the Vienna Woods Hotel has been in operation in this location since 1963. The current owner acquired the hotel in 2006 and has since expanded the hotel and developed some residential housing units on site.

Our client remains committed to the expansion of operations on the Vienna Woods site both of a hotel and residential nature. We submit that in the zoning of lands within the forthcoming development plan, priority should be given to lands, such as our clients land holding at Glanmire, where there is a demonstrated willingness and capacity to deliver development.

Our client's lands have the capacity to accommodate an expansion of the current hotel operations and potentially a range of residential house types which could form part of the hotel or be provided as private dwellings. This development can be provided in the short to medium term. The site has access to all relevant infrastructure including vehicular and pedestrian access and waste water and surface water drainage. As can be seen from the image below the site also benefits from the extensive infrastructure improvements planned for Glanmire. The development of this site will ensure the most effective use of land, infrastructure and resources, while balancing the need to retain the character, landscape, urban form and environment qualities of Cork City.

Fig 3. Proposed infrastructure improvements planned for Glanmire.



Accessibility

The accessibility of new development, both in terms of access to services and existing and proposed transport routes should be a key principle in terms of zoning lands for development in the forthcoming development plan. Our client's landholding at Glanmire benefits from excellent connections in terms of

accessibility to the town centre and to existing schools and services in the area. The site also has excellent vehicular and pedestrian connections to Cork City and will benefit from the ongoing Dunkettle interchange works.

Bus stops are also already in place within close proximity to the lands which facilitate the provision of regular bus services to Cork City centre and beyond. It is submitted therefore that the lands are fully serviced and available for development.

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

Consolidation

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

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

Having regard to the quantum of additional land designated as LPZs in the draft CDP this does not represent a good return on land which is serviced/readily serviceable in the short term. We consider that many of the LPZs, such as our clients lands, are situated in well-located urban areas that benefit from good connections to the city centre and local service centres. These are the types of sites that need to be considered for their development potential to deliver the targets set out in the NPF and RSES. Furthermore, development of such under-utilised lands (where relevant), where it can be shown that same is not to the detriment of existing landscape and built heritage, would support the sustainable transport measures outlined in CMATS as well as other infrastructural investments.

6. Conclusion

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

As set out in detail above, we submit that the forthcoming Cork City Development Plan should consider the following:

- Amendment of draft Zoning Map 05 to remove our clients' lands from the Landscape Preservation Zone and zone the lands as ZO1 Sustainable Residential Neighbourhood.
- Amendment of the landscape policies contained in the forthcoming CDP to have regard for national and regional planning policy which promotes compact and sustainable growth within urban areas within/close to the existing built-up area, on brownfield land or infill sites.

We respectively request that the planning authority give consideration to the issues raised in this submission and we trust that our submission will be taken into account as part of the consultation process for the review of the Cork City Council Development Plan.

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

Yours sincerely,



Cora Savage

McCutcheon Halley