



h w p l a n n i n g

Submission to the Draft Cork City Development Plan 2022-2028

Zoning Submission – Lands at Knockacorbally, Blarney, Cork

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Contents

	1
01 Introduction	2
01.1 Purpose of Submission	2
01.2 Submission Context	2
01.2.1 Settlement Context	2
01.2.2 Site Context	3
01.2.3 Submission Request	5
02 Planning Policy Context	7
02.1 Project Ireland 2040 – National Planning Framework (NPF)	7
02.2 Regional Spatial and Economic Strategy (RSES)	8
02.3 Draft Cork City Development Plan 2022-2028 (Draft CDP	9
03 Assessment	10
03.1 Suitability of Subject Lands to Accommodate Development	10
03.2 Over Reliance on Stoneview and Ringwood UEA's in Delivering New Residential Development	11
03.3 Consistency with Core Objectives of the Draft CDP	13
04 Request	15
04.1 Summary	15

01 Introduction

01.1 Purpose of Submission

This submission has been prepared on behalf of St John Cremin. It has been prepared in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 (Draft CDP). This submission is in response to the Council's draft policies and zoning objectives for the settlement of Blarney. Specifically, this submission requests that the lands in our client's ownership in the townland of Knockacorbally be zoned for residential development in the future Cork City Development Plan 2022-2028. The extent of the subject lands is outlined in red below.



Figure 01.1 Subject Lands outlined in red.

01.2 Submission Context

01.2.1 SETTLEMENT CONTEXT

Our client welcomes the opportunity to make a submission to the Draft CDP and considers it a critical juncture in re-evaluating the strategic roles of all settlements in the city. We consider it an opportune time to re-evaluate the strategic planning role of Blarney, including related policies for the delivery of population and housing targets over the period of 2022-2028. The Local Government Act of 2019 and the associated expansion of the City boundary has resulted in a changed context for Blarney which is now located within the Cork City administrative area. Blarney will play a strategic role in meeting the ambitious growth targets for Cork City as outlined in the National Planning Framework.

Prior to the city boundary extension, Blarney was identified for significant population and housing growth targets, largely centred around Stoneview Urban Expansion Area and Ringwood. Due to the infrastructural constraints presented by both locations as detailed in the current Blarney Macroom Municipal District Local Area Plan (LAP) and Draft CDP, population and growth targets have not materialised in Blarney. A review of recent planning history for the entire settlement confirms that housing delivery has fallen well short of targets during the current County Plan cycle and is likely to be repeated over during the 2022-2028 City Development Plan without appropriate policy interventions.

This is a concerning trend, particularly with the Core Strategy of the Draft CDP identifying such ambitious housing and population growth targets for Blarney by 2028. This evidenced in tables 2.2 and 2.3 of the Draft CDP which identifies the following growth targets for the settlement.

- Blarneys population is to grow to 5,581 no people by 2028, representing a 131% increase from 2016 census figures.
- Blarney is to accommodate an additional 1,338 no. dwellings on tier 1 and 2 zoned lands by 2028.

We consider that the 2022-2028 Cork City Development Plan should remain ambitious in seeking delivery of new housing and infrastructure in Blarney in a manner which recognises its substantial amenity value, potential for growth and strategic location along the rail corridor. However, is considered that a fresh approach needs to be adopted for the town which reflects a '*delivery orientated strategy*', maximising the delivery of new residential development at appropriate locations.

Evaluation of the deliverability of residential lands is a key objective of the National Planning Framework. We consider the City Development Plan should identify additional lands for future residential development in Blarney which are deliverable during the lifetime of the plan. This includes the identification of our clients' lands in Knockacorbally for future residential development where it has been demonstrated in recent times that that residential development can be delivered in the area. The subject lands can be serviced and accessed during the lifetime of the plan and possesses strong connectivity advantages that can serve future residents and is reflective of the emerging pattern of residential development in this area.

01.2.2 SITE CONTEXT

The subject lands of circa 3.2 hectares in area are situated to the north of Blarney and are currently in agricultural use with an existing dwelling house (permitted by Cork County Council planning reference 03/3272) to the southeast corner of the site. The subject lands have traditionally only been accessible via the Castleowen residential development to the south which has limited the previous development potential of the site.

The site is situated in an evolving development context which results that residential development can be accommodated during the lifetime of the 2022-2028 plan. This includes the construction of the Cluain Ard residential development of 78 no. residential units immediately east of the site which is nearing completion. Cork County Council Planning Reference 16/7122 and An Bord Pleanála reference PL 04.248614 refer.

Cluain Ard represents one of the only large-scale residential developments to have been delivered in Blarney during the lifetime of the current LAP. Cluain Ard is accessed from the Monacnappa Estate which in turn leads onto the 'Blarney River Walk Loop' on the

Waterloo Road. Cluain Ard will also deliver a pedestrian link to the south onto Mangerton Terrace satisfying a strong desire line to the south.

During pre-application discussions with Cork County Councils regarding 16/7122, the need for Blarney to expand and the development potential of our clients' lands was recognised. It was requested by the Planning Authority that the applicants in the matter ¹ allow for future access to our clients' lands with a view of facilitating future development. This was reflected in the permitted site layout of 16/7122 and PL 04.248614 where future vehicular and pedestrian access to the subject lands were provided.



Figure 01.2 Permitted Site Layout 16/7122 and PL 04.248614 demonstrating future connectivity to our clients lands

¹ O'Leary & O'Sullivan Developments Ltd

We also note that in December 2020, An Bord Pleanála refused permission for a strategic housing development of 150 houses at the lands immediately south of the subject site in the townland of Monacnappa. An Bord Pleanála reference ABP-308156-20 refers ². The Board had no objection to the principle of the proposed development but refused the scheme on administrative and technical grounds due to the public notices relating to the development not indicating that the proposed density materially contravened the County Development Plan objective for the site. We understand the applicant in the matter is advancing with plans to submit another SHD at the lands and received an Opinion from the Board on 09/07/2021, that a development of 143 no. units represented a '*reasonable application basis*'. An Bord Pleanála Reference TC28.310013 refers.

01.2.3 SUBMISSION REQUEST

This submission requests that the development boundary of Blarney be extended to include the subject lands, and that they be included within the ZO-02 'New Residential Neighborhood' zoning objective in the new Cork City Development Plan.

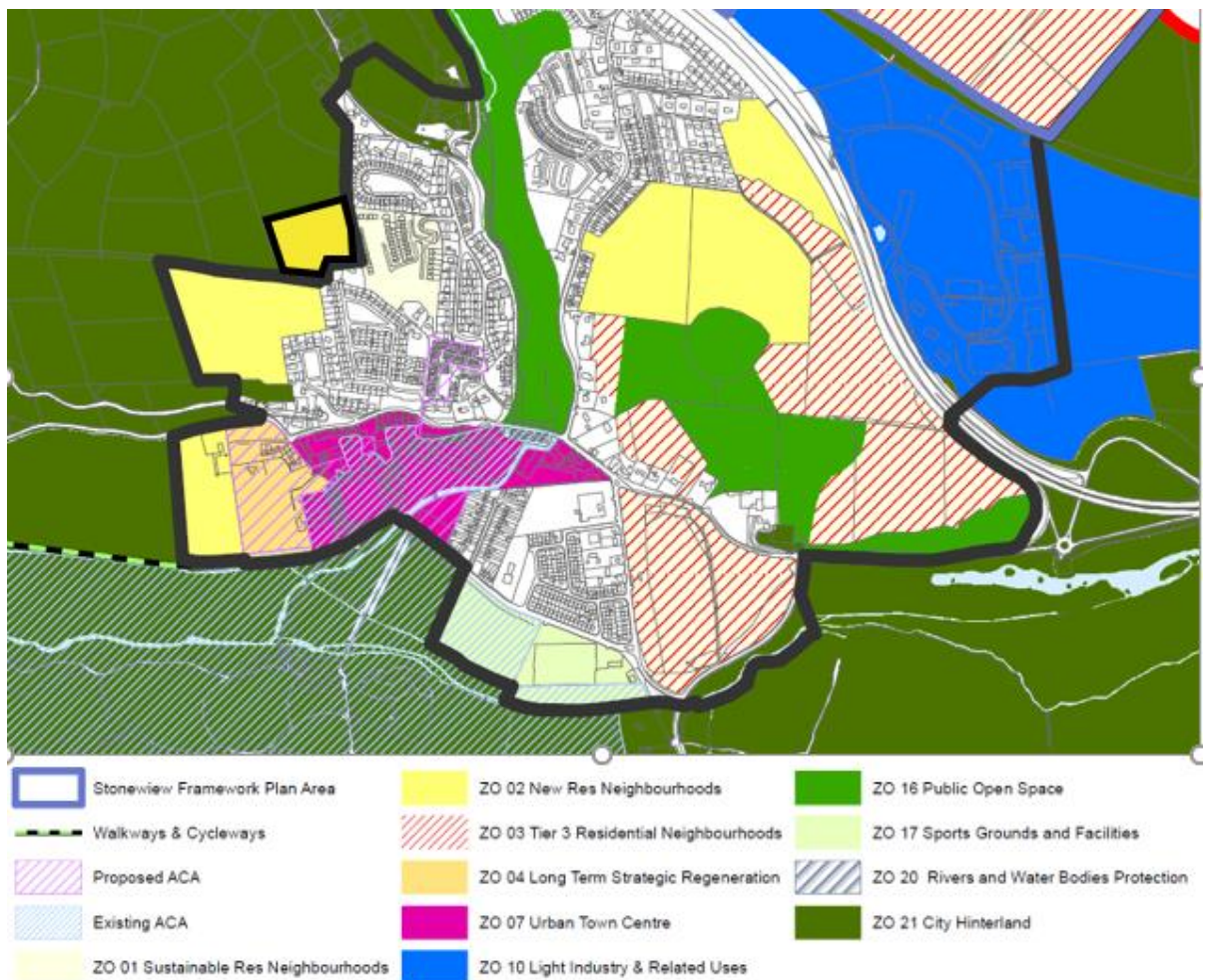


Figure 01.3 Proposed Zoning Map

We consider the extension of development boundary and inclusion of the lands within the ZO-02 objective is appropriate for the following reasons.

- The subject lands represent a natural extension of the existing settlement of Blarney and will contribute to a more compact settlement.

² www.monacnashd.ie

- The Monacnappa/ Knockacorballly area is a natural expansion area with the recent delivery of Cluain and the potential future SHD to the south. The subject lands link both of these sites and create opportunities for a future pedestrian permeability and which integrates with the existing pedestrian infrastructure in the area.
- Blarneys inclusion within the City Boundary Extension Area and identification as an *'Urban Town'* in the settlement hierarchy of the Draft CDP, means the settlement needs to play a leading role in delivery increased levels of new housing. The subject lands are deliverable in the short term and future development can assist in addressing the recent shortfall in new housing in the settlement.
- There has been a long-term over-reliance on the delivery of the Stoneview and Ringwood Urban Expansion Areas for Blarney to meet its housing and population growth targets. While it is acknowledged that development at Stoneview and Ringwood will address much of Blarneys long term housing needs, due to the infrastructural works needed, they are unlikely to be delivered during the lifetime of the 2022-2028 Plan. Sites which are serviceable and within walking distance of the town centre should be prioritised for residential development during the lifetime of the plan to address Blarneys short-medium term housing shortage.

02 Planning Policy Context

02.1 Project Ireland 2040 – National Planning Framework (NPF)

The NPF includes a list of ‘shared goals’ across the country framed as 10 National Strategic Outcomes, which include, inter alia, the development of compact growth and sustainable mobility. Section 2 of the NPF calls for significant ambition to realise the potential of places, and within this, the need to prioritize growth in key regional centres and towns to lead the development of their regions and complement the role of Ireland’s main cities including Cork.

The **National Policy Objective 3c** requires that at least 30% of new homes that are targeted in settlements other than the five Cities and their suburbs, be delivered within their existing built-up footprints including brownfield and greenfield infill.

National Policy Objective 6 the NPF advocates that cities, towns and villages of all types and scale should be regenerated and rejuvenated 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.

Under **National Policy Objective 9**, the NPF formalizes the requirement to identify certain settlements in each Regional Assembly area for “*significant rates of population growth*” as part of a tailored approach to strengthening Ireland’s urban structure.

National Policy Objective 33 states that the locations of new homes should be prioritised at locations where sustainable development patterns can be encouraged and to reduce commuting times and congestion which negatively effects people’s lives.

National Policy Objective 68 sets out that a Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to:

- any relocated growth being in the form of compact development, such as infill or a sustainable urban extension.

National Policy Objective 72a - Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

Section 3.4 of the NPF indicates that within the CASP study area, which approximates the Cork Metropolitan Area, there will be a greater focus on achieving ‘*balanced and compact, connected growth*’. This requires that future housing delivery should be based on factors including access to amenities and sustainable transport modes, in order to avoid long-distance commuting patterns and quality of life impacts.

The NPF identifies a number of key future growth enablers for Cork City and its Metropolitan Area including:

- 'Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors.

02.2 Regional Spatial and Economic Strategy (RSES)

The RSES profiles the Southern Region and establishes a strategy to improve the Region through 9 distinct strands which include:

- 'Compact Growth'
- 'Strengthening and growing our cities and metropolitan areas, building on the strong network of towns throughout the region and supporting our villages and rural areas';
- 'Enhancing regional accessibility through upgraded transport infrastructure and digital connectivity allied to transformed settlement hierarchy';
- 'Providing infrastructure and services in a sustainable, planned and infrastructure-led manner...'

RPO 152 of the RSES 'Local Planning Objectives' lists a number of principles that need to be assessed in a local context when considering the interrelationship between land use and transport. RPO 152 lists the following as one of the specific areas where land use and transport integration will guide development:

Planning at the local level will prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools'.

The overall strategy of the Cork MASP has been directly influenced by a number of 'National Enablers' identified in Section 4.0. One of the key 'enablers' which will assist the Cork MASP in realising its full potential and strategic functions is by focusing new residential areas along the Cork Metropolitan Rail Corridor.

The realisation of the vision for the Cork MASP will need to be led by a number of Guiding Principles identified in Section 3.2 of the Cork MASP which include:

- **'Metropolitan Engine'** -Targeted growth will occur in Metropolitan Cork which has significant capacity within its hierarchy of settlements and strategic employment locations along public transport corridors.....
- **Integrated transport and land use**-Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects under the development of a Cork Metropolitan Area Transport Strategy.....
- **Accelerate housing delivery** - Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based design standards as supported by NPF National Policy Objective 13 to achieve higher densities in the urban built up areas, supported by better services and public transport.'

Section 5 of the Cork MASP identifies ambitious housing and population targets for the Cork MASP up to 2031. These can be summarised as follows:

- 20,281 no. people will be accommodated within the 'Rest of Cork Metropolitan Area' by 2026, increasing to 29,657 no. people by 2031.

The RSES places a key emphasis on place-making and creating sustainable and inclusive communities for future residents. Regional Policy Objective (RPO) 176 '10 minute City and Town Concepts' aims to "attain sustainable compact settlements with the "10-minute" city and town concepts, whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services".

02.3 Draft Cork City Development Plan 2022-2028 (Draft CDP)

The Draft CDP is based on a number of key strategic principles identified in Section 1.5 of the Plan including:

Compact growth - Integrate land-use and transport planning to achieve a compact city with 50% of all new homes delivered within the existing built-up footprint of the City on regenerated brownfield, infill and greenfield sites identified in the Core Strategy, and to achieve higher population densities aligned with strategic infrastructure delivery.

A city of neighbourhoods and communities - Develop a sustainable, liveable city of neighbourhoods and communities based on the 15-minute city concept, ensuring that placemaking is at the heart of all development.

Strategic Objective SO1 – Compact Liveable Growth aims to:

"Deliver compact growth that achieves a sustainable 15 minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city."

Blarney is identified as an of four 'Urban Towns' in the Draft CDP. Regarding 'urban towns' strategic functions table 2.5 of the Draft CDP states the following.

City Area	Role in the Core Strategy	Some Key Sites	Key Deliverables
Urban Towns	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.	Expansion of South Ballincollig (Maglin), South Glanmire (Ballinglanna). Opportunities to repurpose underutilised sites within town centres.	1. Framework plans for South Ballincollig and South Glanmire. 2. Heritage led plans for Blarney and Tower. 3. Action plans for key sites (Neighbourhood Development Sites). 4. Plan for the long-term delivery.

Paragraphs 10.231 – 10.235 of the Draft CDP refers to 'Population and Housing' considerations for Blarney during the lifetime of the Plan. The significant infrastructural deficiencies at Ringwood and Stoneview are acknowledged. It is recognised in paragraph 10.234 of the Draft CDP that much of the population and housing growth for Blarney will occur in the Waterloo Road/Monancappa areas of the settlement, in the area of the subject lands.

10.234 - "It is therefore expected that residential development in Blarney will largely be confined to areas adjoining the built-up area along Waterloo Road/Monancappa for the initial period of growth for Blarney."

03 Assessment

03.1 Suitability of Subject Lands to Accommodate Development

We consider the future strategy for Blarney in the new Development Plan should be a renewed focus on delivery of housing and population targets at appropriate locations. This includes our clients' lands at Knockacorbally which are immediately adjacent to existing residential areas and the recently delivered Cluain Ard residential development. The subject lands are adjacent to the existing development boundary of Blarney, within a short, accessible distance of the town centre, but also at an appropriate separation so as to minimise its potential impact the historic core of the town.

The development potential of our client's lands can be unlocked with limited intervention in terms of infrastructural improvements. Vehicular access to the lands can be provided via the existing Castleowen residential development to the south and via the Cluain Ard development to the east. The subject lands are in close proximity to both the Blarney water treatment works and to nearby serviced estates, thereby minimising the costs of servicing the lands. In comparison to the infrastructural requirements that are involved with unlocking the Stoneview and Ringwood UEA's in Blarney, we consider the subject lands present a much more realistic prospect of delivering housing within the lifetime of the upcoming City Development Plan.

The inclusion of the subject lands within a general ZO-02 'new residential neighbourhood objective will not only assist in delivering additional residential development in Blarney, but also promote connectivity and permeability within the settlement. The subject lands are approximately 500 metres north west of Blarney town centre and offers strong connectivity links to the town centre, compatible with the 10-minute neighbourhood principle, as outlined in the RSES and the 15-minute settlement objective in the Draft CDP. Future residents at the subject lands would have direct access to the 'Blarney River Walk Loop' on the Waterloo Road through Cluain Ard and the Monacnappa residential developments providing for a safe and attractive amenity that will encourage walking and cycling as viable means of transport from the site.

The proposed development also provides unique opportunities to facilitate increased permeability and interconnectivity between various emerging development areas in Blarney. As referenced previously the subject lands are situated between the Cluain Ard residential development to the east, the Castleowen residential development to the south and the potential future SHD site at Monacnappa. Future residential development at the subject lands provide an opportunity to provide an integrated series of pedestrian/cycle connections in by linking the SHD/Castleowen and Cluain Ard lands. This would facilitate the creation of a pedestrian/cyclist loop in the northern environs of Blarney, satisfying natural desire lines to the town centre and the amenity walkway on the Waterloo Road.

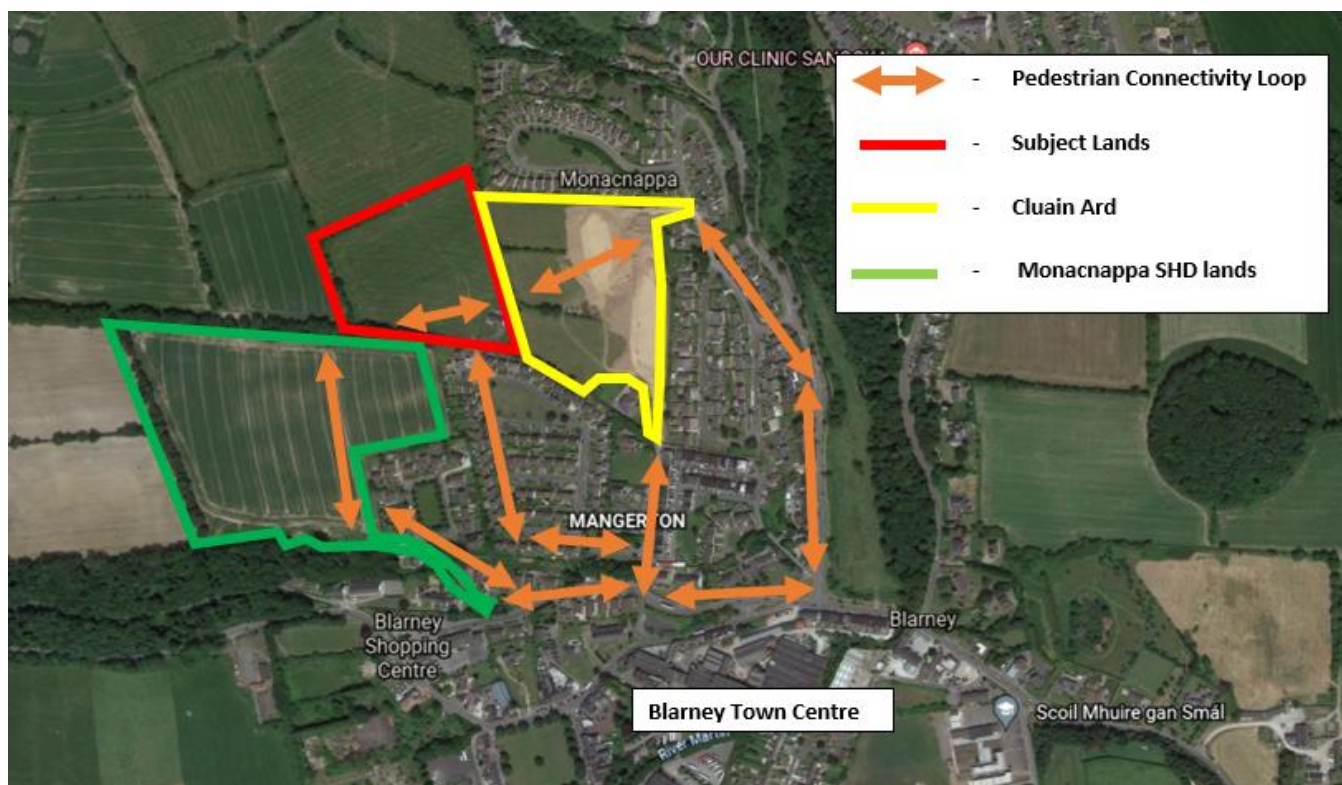


Figure 03.1 Potential future Pedestrian/Cyclist loop through the subject lands

03.2 Over Reliance on Stoneview and Ringwood UEA's in Delivering New Residential Development

As referenced in Section 01 of this submission, tables 2.2 and 2.3 of the Draft CDP outline the housing and population growth targets for Blarney and the other settlements in the city area. An overview of the targets outlined in the Draft CDP Core Strategy confirms significant uplift in the delivery of new residential development in Blarney is not only of local significance, but of wider strategic importance for the city. Tables 2.2 and 2.3 confirm that with the exception of the city docklands, Blarney is the settlement which is identified to accommodate the largest rate of population growth in the future CDP.

An analysis of the proposed land-use zoning objectives in the Draft CDP identifies 5 no. significant greenfield land parcels in Blarney as Tier 2 (ZO-02) New Residential Neighbourhoods³. Of the five parcels, two are contained within the proposed Ringwood UEA and one at the Stoneview UEA. (Sites 3,4,5 on the marked-up zoning map as shown in figure 3.2).

³ Tier 1 comprises serviced zoned lands that is sufficiently serviced to accommodate new development. Tier 2 lands are serviceable zoned lands that are not currently fully serviced but have the potential to become fully serviced within the life of the Plan. Tier 3, which are strategic lands necessary for long-term planning of infrastructure, given the ambition growth target set out in the NPF, but also provide for substitution of Tier 1 or Tier 2 lands that do not come forward for development within this Plan period, where appropriate.

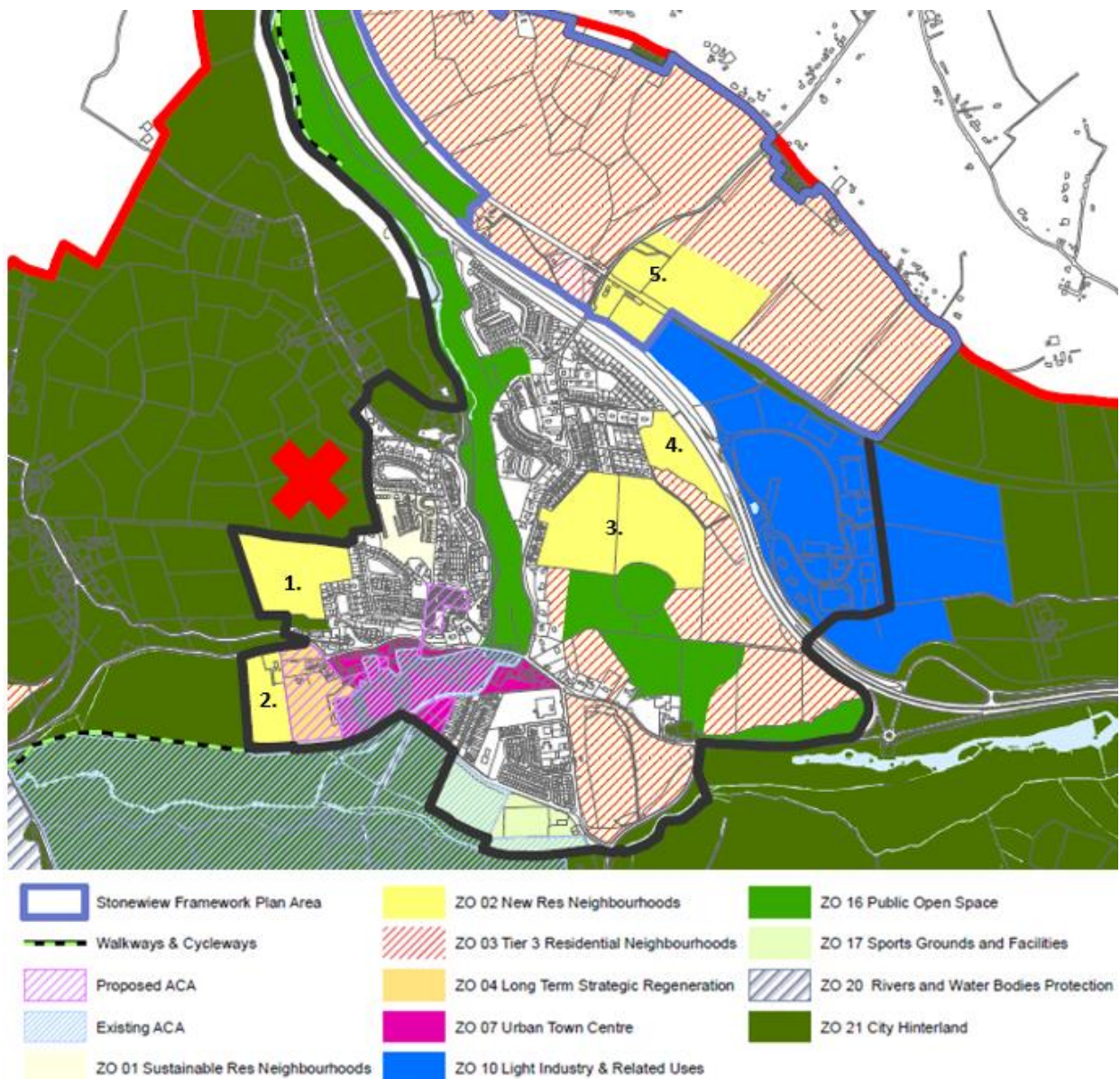


Figure 03.2 Location of proposed Tier 2 zoned lands in Blarney – subject lands marked with red X.

The delivery of large-scale residential development at Stoneview and Ringwood follows on from long standing aspirations for the Blarney in recent County Development Plans and Local Area Plans. The Stoneview lands will require new services such as water and wastewater infrastructure and new roads, including significant upgrades to the N20 and a new grade separated interchange. This development had previously been proposed by a private developer (Cork County Council Planning Ref. 06/5518), the permission having since lapsed. A substantial element of these works will now be carried out by TII as part of the M20 project, which is still at early feasibility stages, and is identified as a medium-term goal in CMATS with a target delivery date of 2031.

In addition to the above, the ability of the lands in Stoneview to deliver the required housing is largely dependent on the re-opening of the railway station in Blarney. The recently published CMATS implementation strategy indicates that new stations will be delivered in accordance with land use development and indicates their delivery as a long-term goal, with an ultimate completion date of 2040.

Tables 3.4 & 3.6 of the current 2017 LAP provides a full outline of the various infrastructural requirements that will be needed to deliver development at these lands over various phases. The list is extensive and little progress has been made to date.

The challenges in delivering initial phases at Stoneview and Ringwood remains present as identified in paragraphs 10.232 and 10.233 of the Draft CDP which expand on the specific nature of the difficulties in delivering both UEA's

10.232 – "Stoneview, a large area earmarked for residential and employment development, requires investment in transport and utilities infrastructure to enable growth. Cork City Council recognises the potential Stoneview presents for public transport orientated development given its strategic position on the Dublin-Cork Railway line and will be preparing a framework plan in collaboration with relevant stakeholders including the NTA, TII, IDA and landowners which aims to address infrastructural constraints and allow for the development of this area."

10.233 – "Similarly, constraints have been identified at Ringwood, another large-scale development area located just outside the town centre on Station Road, and significant works will be required to allow for development of these lands."

10.234 - "It is therefore expected that residential development in Blarney will largely be confined to areas adjoining the built-up area along Waterloo Road/Monancappa for the initial period of growth for Blarney."

In light of the above, NPO 72 of the National Planning Framework should be considered by the Planning Authority when assessing the deliverability of existing zoned lands at Stoneview and Ringwood and alternatives should be explored in order to achieve short term targets for the settlement.

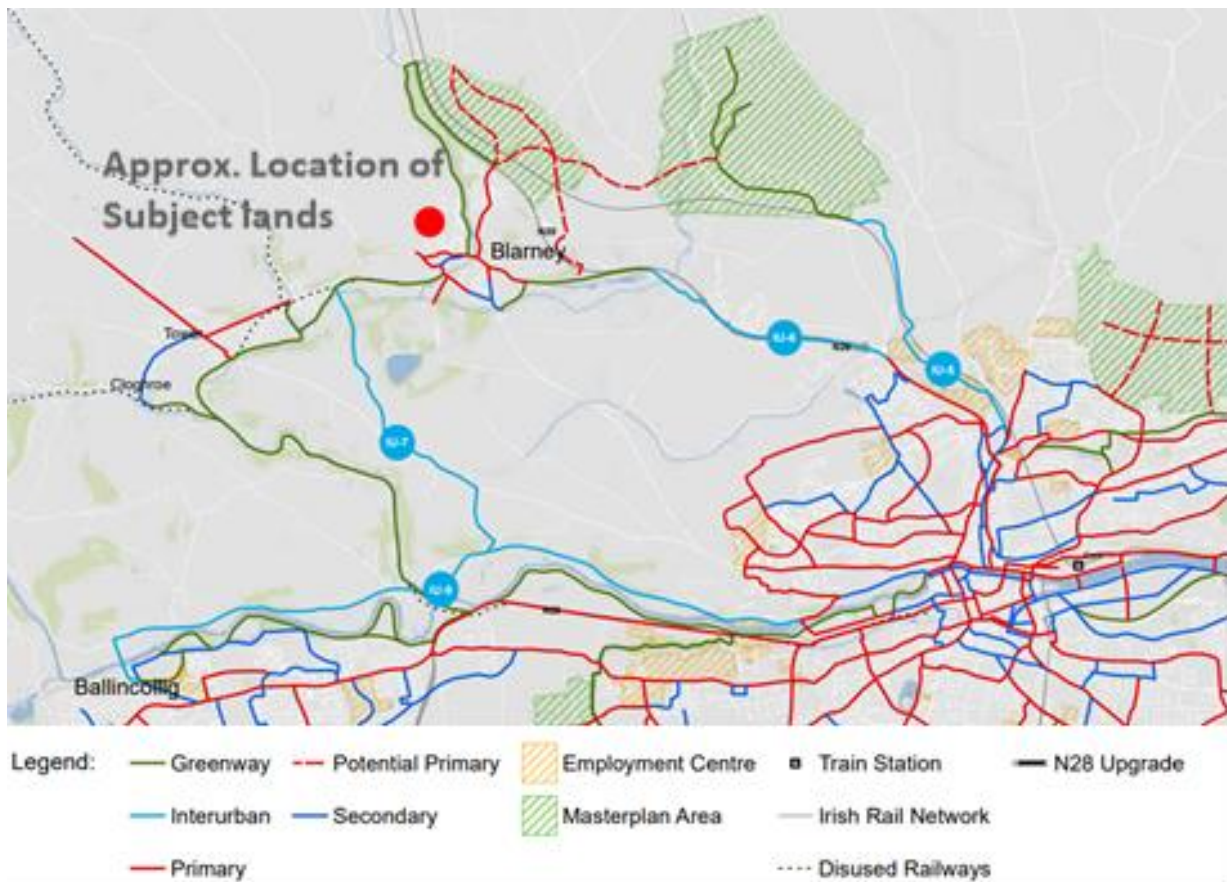
03.3 Consistency with Core Objectives of the Draft CDP

The identification of the subject lands as a New Residential Neighbourhood (ZO-02 zoning objective) is in accordance with core principles and objectives of the Draft CDP and national and regional planning guidance. Future residential development at the lands is consistent with Blarneys strategic role as an 'urban town' in the settlement hierarchy of the plan. Table 2.5 of the Draft CDP defines the objectives for the future growth of 'urban towns' and states

'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.'

The inclusion of the subject lands within a ZO-02 'New Residential Neighbourhoods' objective in the new City Development Plan is not only consistent with this vision but can positively contribute to the pedestrian and cycle network as a whole, enhancing the residential amenities of existing residents in Blarney. As referenced in section 3.1 of this submission, future development at the subject lands could facilitate a pedestrian/cycle loop linking existing, permitted and future developments in the area. This will not only serve future residents of the subject lands but satisfy natural desire lines from Cluain Ard and the future SHD lands to the town centre and schools to the south. This potential

pedestrian/cycle loop would also link into wider pedestrian and cycle upgrades for Blarney identified in CMATS which include the Waterloo Road, Blarney bypass road and along the



R617 to Tower.

Figure 03.3 Subject land's location relative to future cycle network upgrades in CMATS

Future development at the subject lands is also consistent with key strategic principles of the Draft CDP, RSES and NPF including the promotion of compact growth in settlements, the promotion of walking/cycling as viable alternatives to car-based travel and the delivery of new residential development in areas close to existing urban centres. Future residential development at the lands is in accordance with NPO's 3, 6 9, 33 and 68 of the NPF in addition to relevant RPO's in the RSES and objectives for the Cork MASP including the acceleration of housing delivery in Blarney.

04 Request

04.1 Summary

In summary the key points/ request of this submission are as follows:

- It is considered that the inclusion of the subject lands within the defined development boundary of Blarney and within a ZO-02 'New Residential Neighbourhoods' zoning objective is consistent with the core principles and objectives of the Draft CDP, RSES and NPF
- The subject lands represent a natural extension of Blarney with the lands, being located to the south and east by the current development boundary of the settlement. Future development at the subject lands will contribute to a compact town with residents having access to direct pedestrian links to the town centre.
- Future development at the subject lands provides an opportunity to enhance permeability and pedestrian/cycle linkages between the Cluain Ard development to the east and the future SHD lands/Castleown development to the south. This would benefit all existing and future residents in Blarney by creating more convenient and accessible pedestrian environment.
- Future residential development at the subject lands is consistent with Blarneys strategic role as an 'Urban Town' settlement in the settlement hierarchy of the Draft CDP.
- Blarney has consistently undelivered in the realisation of population and housing targets identified in recent Local Area Plans and County Development Plans. The Draft CDP identifies ambitious growth targets for Blarney with a target for a 131% increase in population from 2016 census figures. It is recognised that there has been a long standing over reliance on the delivery of the Stoneview and Ringwood UEA's to deliver the necessary quantum of housing to allow Blarney to fulfill its strategic functions in the Cork Metropolitan Area.
- It is considered that the Draft CDP should adopt a '*delivery orientated strategy*' for *Blarney* whereby lands that are not reliant on the delivery of critical infrastructure should be prioritised for development. The subject lands can be developed during the lifetime of the plan and would represent an appropriate extension to the northern environs of the settlement.