

CUNNANE STRATTON REYNOLDS

CSR Ref: 96601/EMP/011021

Forward Planning,
Planning Department,
Cork City Council,
City Hall,
Anglesea Street,
Cork

4th October 2021

Submission Through the Consultation Portal

Dear Sir/Madam,

Submission on the Draft Cork City Development Plan 2022-2028 on Behalf of Paul Twohig in Respect of Lands at Killeens, Cork.

I refer to the above and request the City Council consider this submission on the emerging Cork City Development Plan 2022-2028.

Our client Paul Twohig of Stoneview, Blarney, Cork City, owns a site in Killeens of some 2.1ha which we believe is capable of being developed within an extended development boundary for Killeens.

The Site

The extent of our client's site is shown in Figure 1 below. It is a broad site of undulating pasture with some relatively level ground currently in pasture on the south eastern side. It is relatively well screened with mature hedgerows. The site is elevated allowing gravity drainage and has no chance of flooding.

The site is not visible from Blarney and is shielded by land undulation so no impact visually from the N20 Mallow Road, Blarney village or western surrounds.

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Figure 1: Extent of Our Client's Site



Location

The site is located to the north east of Killeens and importantly from a planning perspective is contiguous to an industrial plant owned by our client's late uncle to the south and is contiguous to existing development to the west. As stated below Killeens is a lower order settlement within the City Council boundary and that is located in a rural area within the defined City Hinterland.

National Planning Policy and Guidance

National Planning Framework (NPF) 2018

The National Planning Framework (NPF) is a key national planning policy document, providing a broad planning framework for development and population growth in Ireland. The NPF provides a series of contextual planning objectives, taking into account the future long term population growth and development needs of Ireland to 2040.

The residential development of our client's site would be fully consistent with a number of key National Policy Objectives (NPO's) that will deliver the NPF's overarching objective of compact growth, including the following specific objectives:

- NPO 3a – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- NPO 4 – Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- NPO 33 – Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

More balanced growth which is a key aim of the NPF means more concentrated growth. We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In the NPF those five cities will represent for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas (including Killeens) accommodating the other 50% of growth.

The National Planning Framework (NPF) provides an overarching planning policy framework for the State. It sets significant targets for Cork and suburban area with a population growth of 105,000 – 125,000 and a minimum population of 314,000 by 2040 which equate to a 50% population growth also by 2040 (it should be noted that the RSES has a population target date of 2040 and the RSES a population target date of 2031). This growth is to be spread on basically a proportional basis accordingly to settlement size and function.

It is stated in the NPF that all settlements should receive an allocation of population commensurate with available and prospective services, soft and hard infrastructure, amenities and facilities.

Regional Planning Guidance

Regional Spatial and Economic Strategy for the Southern Region (RSES) 2020

Regional Spatial and Economic Strategies provide a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework. In supporting the NPF, the RSES prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. The RSES seeks to ensure that rural locations including those such as Killeens within a city administrative boundary are vital and vibrant places to live and work.

Provisions of the Draft Cork City Development Plan 2022-2028

This site is located within the defined Hinterland of the City administrative area. Within this defined hinterland the following applies:

'Growth in the city hinterland is managed through the delivery of scaled community, housing and local employment developments in the settlements of Killeens, Upper Glanmire and Kerry Pike. Any development proposals in the remainder of the hinterland will be closely managed to protect against unnecessary and unplanned urban sprawl.'

Para 2.56 entitled 'Role in the Core Strategy' states that the City Council will:

'Allow for the sustainable growth of Killeens, Glanmire Upper and Kerry Pike through infill, brownfield or edge of centre development within defined settlement boundaries.'

Within the settlements of Killeens, Glanmire Upper it is stated that some key sites would be expected to cater for growth of 15% within the three hinterland settlements.

The key deliverables for such Hinterland settlements (HSs) are as follows:

1. Consolidated village centres; and,
2. Apply Sustainable Growth targets.

Objective 2.29 deals specifically with development in the HSs and states that development in the city hinterland settlements shall be managed through the delivery of scaled community, housing and local employment development in the settlements of Killeens, Upper Glanmire and Kerry Pike.

Specific mentions of Killeens in the Draft City Plan are as follows:

'10.343

Killeens is located approximately 2 kms north of the built up part of the City and lies directly adjacent to the main N20 Cork to Limerick road. The village is bound to the south by the N20 and is set against a backdrop of elevated hills to the north. Significant residential development has taken place on the settlement's fringes mostly within an estate to the north east of the village. Services are limited with only a public house and a bus service from the City.

10.344

The vision for Killeens up to 2028 is to secure a small increase in the population of the settlement to retain and improve local services and facilities, to create a sense of place and character, and to strengthen infrastructure provision and public transport connections.

10.346

The existing population of the village from the most recent census data is 765 people with 258 households. New development in Killeens over the Plan period should not exceed 10% of the existing village population. This requirement is to fulfil projected population targets but also to allow new development to respect the scale, character, pattern and grain of existing development.'

Whilst the above would suggest that there is limited development potential attributed to the HSs, including Killeens, there are some grounds for being optimistic that Killeens could accommodate a greater quantum of development under certain circumstances. The longer term potential of Killeens is identified in para 4.69, in relation to enhancement of suburban rail. Para 4.69 states the following:

'Suburban Rail'

Maximising the potential of the rail corridor will support better integration of land use planning and public transport. This approach provides justification for new greenfield development at Blarney / Stoneview, brownfield development at Tivoli and an examination of the potential for future development in the North West Corridor of the City such as Killeens. The provision of new train stations at Blackpool, Blarney and Tivoli is consistent with Cork City Council's policy and objective to significantly intensify development around these locations. As the Suburban Rail will utilise the existing mainline between Mallow and Kent and onto Midleton is important to ensure that the provision of additional suburban rail stations and services will not preclude the ability of train providers to increase the speed or frequency on this line.'

Objective 10.91 in respect of Hinterland Settlements states that it will be an aim of the local authority:

'To limit the development of residential developments in the hinterland settlements of Kerry Pike, Killeens and Upper Glanmire to no more than 10% population growth over the lifetime of the Plan. Any further residential proposals must set out how developments will tie into the village and provide adequate pedestrian and cycling linkages to the village.'

The potential for population growth is set out in Figure 2 below which is taken from the Draft Plan.

Figure 2: Population Growth for Hinterland Settlements

Core Strategy 2028: Compact Liveable Growth ¹						
Cork City	Baseline Populations (2016)		Future Population Growth (2028)		Actual Population Growth (2028)	
	Existing Population	% of Total Population	Future Population	% of Total Growth	Actual Population Growth	Proportionate Growth Rate
City Centre	22,732	10.8%	26,218	7.0%	3,486	15%
City Centre Regeneration (new build)	–	–	23,945	2.4%	1,213	5%
City Centre Consolidation (re-use)	–	–	2,273	4.6%	2,273	10%
Docklands	1,667	0.8%	7,737	12.2%	6,070	364%
City Docks	1,667	0.8%	7,239	11.2%	5,572	334%
Tivoli Docks	0	0.0%	498	1.0%	498	–
City Suburbs	141,808	66.7%	160,289	37.3%	18,481	13%
North East Suburb	26,841	12.7%	35,561	17.6%	8,720	32%
North West Suburb	23,125	11.0%	23,728	1.2%	603	3%
South East Suburb	51,605	24.5%	58,457	13.8%	6,852	13%
South West Suburb	40,237	19.1%	42,543	4.7%	2,306	6%
Urban Town	33,886	16.1%	54,650	41.9%	20,764	61%
Ballincollig	18,159	8.6%	29,003	21.9%	10,844	60%
Blarney	2,550	1.2%	5,881	6.7%	3,331	131%
Glanmire	9,903	4.7%	15,329	10.9%	5,426	55%
Tower	3,274	1.6%	4,437	2.3%	1,163	36%
Hinterland	10,521	5.0%	11,300	1.6%	779	7%
Hinterland Settlements (3)	1,792	0.8%	1,971	0.4%	179	10%
City Hinterland (Single Dwellings)	8,729	4.1%	9,329	1.2%	600	7%
NET Total (-25% site area)	210,853 ²	100%	260,194	100%	49,580	24%

The ability, and indeed the lack of ability, for Killeens to accommodate any further development within what is an exceedingly tight and restrictive defined settlement boundary. That boundary is shown below in Figure 3.

Figure 3: Defined Settlement Boundary Around Killeens



Our Clients Request

Our client requests that the development boundary of Killeens be extended to include the precast concrete site between our client's site and the development boundary and that the development boundary be extended further to incorporate our client's site. The google maps view shows the field marked with an 'x' above and the remaining lands could facilitate parkland and open space for Killeens.

It is clear that the settlement of Killeens cannot extend to the south as the N20 establishes a clear boundary to further development and it would not be appropriate to have development extend to the other side of the N20. It is clear that the area marked as cream colour as a brown field site but for some reason located outside the development boundary should be brought back into that defined boundary. That is a serviced site that would then facilitate the development of our client's site immediately adjacent and contiguous without leapfrogging. Access can be provided through that site or alternatively from the north.

Why the need to extend the boundary? It is clear from the above that there is a very substantial population growth anticipated for Cork and its hinterland to the

period 2040 covered by the NPF of 105,000 to 125,000 persons. Within the period of the 'new' or emerging plan until 2028 there is a requirement evident from Figure 2 above that there is an additional population of 50,000 to be accommodated within the emerging plan period. We strongly disagree that only an increase of 179 new persons is to be accommodated covering all 3 no. HSs within an overall figure of 50,000 as shown in Figure 2 below. This equates to 60 persons for each of Killeens, Upper Glanmire and Kerry Pike.

There is clearly an inherent contradiction between an increase of 60 persons over the 6 years of the emerging plan with the insistence in 10.346 that growth over the plan period be limited to 10% of the existing population which is acknowledged para 10.346 above as 765. That would permit some 77 people by way of future growth or some 26 new housing units assuming a household size of 3 persons.

Within the very tightly drawn boundary there is relatively little opportunity to meet that housing requirement within the existing defined settlement boundary. In fact, it should be noted that the largest area, free of development, and that would be capable of comfortably accommodating new development is the area of zoned green space which we believe is entirely over-proportionate to the size of the settlement and its rural location. On the basis of that open space designation being retained within the settlement we feel it is imperative that the development boundary is extended initially to include the Twohig precast concrete facility and also our client's site.

We understand that a submission will be made to include the precast concrete factory site within a request for a boundary extension in this location.

In summary we would point out that the allocation of growth for Killeens is wholly inadequate and entirely arbitrary and in these circumstances the vitality and viability of this as a settlement and indeed as a location for public transport is entirely cast in doubt. The growth envisaged is entirely insufficient in our view to support and sustain public transport.

We trust that you will consider the above in your deliberations on the above and we await acknowledgement of safe receipt.

Yours sincerely,



Eamonn Prenter MIPI MRTPI
Director
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