

## Submission to the Draft Cork City Development Plan 2022-2028



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## 1.0 EXECUTIVE SUMMARY

1.1 This submission makes several planning arguments in favour of the lands at Ballinveiltig, Curraheen, Bishopstown being zoned as 'New Residential Neighbourhood' within the 'Compact Growth' area rather than the 'Hinterland' area of Cork City Metropolitan Area. The subject lands adjoin the established built-up area of Bishopstown and are between Bishopstown and the town of Ballincollig. The immediate area to the east of the site has been the subject of numerous grants of planning permission in recent years [Ardrostig] and the development/zoning of the subject lands are the logical next step. The subject lands are put forward as a viable location for residential development based on their sustainable location in proximity to the western public transport network.

1.2 The submission presents a multi-faceted and robust case in favour of the designation of the subject lands as residential/within the compact growth area. A planning case is presented in favour of the zoning of the lands, and it is considered that the subject lands are the optimum choice for residential for a number of reasons:

- **Location of the lands:** the subject lands constitute the logical extension of the contiguous built-up area of Cork City and the settlement of Bishopstown – the currently vacant lands to the southwest of Bishopstown are now all in the process of being developed/obtaining planning permission and as such, in order to continue to provide for growth additional lands in this area should be zoned. The lands are located within the functional area of Cork City Council and soon will bound substantial residential development. Two third level colleges, hospitals, future hospitals and their constituent employees and students are all in close proximity to the subject lands. Many of these employees and students in these institutions are currently traversing the city to / from work because they can't find suitable/available accommodation locally. The potential of the available lands so close to these employment and student hotspots is not being exploited. Development should be pursued in this area where there is future capacity for development. To accommodate growth in sustainable locations, in terms of both housing and employment growth, zoning of suitable land in the right locations is of upmost importance, the subject lands are deemed most suitable for a compact growth/new residential neighbourhood designation – at the very least a 'future residential neighbourhood'/Tier 3 designation should be considered.
- **Ambitious Population and Housing Targets:** In the context of the significant supply-side challenges currently facing both the housing and planning sectors, evidence is presented in this submission that substantiates the view that more proactive measures are needed to meet the population and housing targets set out at a regional level. In order to meet these targets, the local authority [through the act of land use zoning] is required to provide sufficient and suitable lands in sustainable locations for which this development can happen. It is considered that the city council have adopted a very conservative approach in their attempt to achieve the significant and considerable growth which is earmarked for Cork. The 'hinterland' area in particular is considered extremely short sighted and the local authority are pleaded with to view the 'hinterland' for what it was intended to be when the boundary extension occurred which is - a future development area for which to accommodate the long term growth of Cork City over the next few development cycles – this 6 year plan seems to adopt a very rural view akin to a county council authority and could be very difficult to reverse and accommodate growth into the future.
- **Availability of Development Land:** Residential zonings in some instances [where infrastructure is not in place] can sterilise prime development lands in extremely sustainable locations that are developable in an immediate context and is, in effect, constraining housing provision in Cork City Metropolitan Area over the last number of years. This is illustrated by drawing attention to the disproportionate amount of single houses to scheme units constructed recently and further compounded by the fact that housing

targets have not been achieved any year since the early 2000's City Development Plan. Therefore, it is important that available sites such as the subject lands are considered for development as many of the zoned sites nearby are not available.

- It is suggested that the forthcoming Draft Cork City Development Plan have sufficient regard to the amount of land which is zoned but undevelopable in the next 1-3 years due to said land being in receivership/NAMA/bought by an international investor who intends to retain it for a period amid speculation that the market in Cork is set to increase and also the lands which needs significant investment to be developed. This is particularly true in the Ballyvolane and Docklands Areas of Cork City – the Docklands in particular is not likely to be solution to the short-term housing supply problem rather it is more likely to be an incremental process led by developers. The contemporary economic reality behind the non-development of many key 'special policy areas' and 'key growth areas' designated for significant development is that they carry a premium in terms of value – the economic impact of land use zoning has not been adequately considered – zoning all suitable site up to a maximum of X housing units would be a more appropriate response. Strategic thinking is necessary to stand a chance of achieving the ambitious housing targets. As such, in the presence of substantial demand and unprecedented under-supply it is considered that it is the legislative responsibility of Cork City Council to ensure that there is sufficient developable and available land in order to meet regional and national population and employment targets.
- **Short term delivery:** the site owner is in a financial position to provide development on site in the short term if the lands were zoned for residential development.
- **Planning Policy Context:** the national, regional, and local planning context provides a strong context for the inclusion of the subject lands within the compact city development boundary/new residential neighbourhood designation. The NPF states that: "Where greenfield development is necessary it should take place through the logical extension of existing cities, towns and villages". This is particularly important in the context of this submission as it presents the case, at a national level for greenfield development to occur on the periphery of/with the boundaries of, urban areas. The fact is that the city needs to expand and grow, Bishopstown West is growing and the moment and the subject lands are the next logical step. There is currently insufficient land zoned within the Cork City area in order for it to achieve its projected population targets. This needs proactive action to remedy.

### Principal Point

1.3 Considering the evidence presented and, ultimately in the interest of proper planning and sustainable development the submission strongly recommends that the subject lands are designated as being zoned as 'New Residential Neighbourhood' rather than the 'Hinterland' area of Cork City Metropolitan Area. The Hinterland designation is very rural in nature and will be very hard to reverse. The advocates of the boundary extension sought an appropriate area for the city to grow but the hinterland designation seems to be doing the opposite.

### Secondary Point

1.4 It is considered that an over emphasis has been placed on the development of the Ballyvolane/Northeast Suburbs and the Docklands areas. Owing to the obvious and well – known infrastructural constraints with these areas Cork City Council is warned that this will most likely lead to a failure to achieve housing targets. A 2-year review should occur in order to monitor and review the progress of achieving growth – we cannot afford to wait another 6 years for a new plan if this plan fails to deliver. After 2 years all development proposals should be considered provided, they can be delivered, the lands are available and developable and sustainable [connected to public transport network]. The future light rail from Ballincollig to Mahon via the City Centre [and the subject lands] means that development should be relentlessly pursued following a west to east growth settlement strategy.

## 2.0 INTRODUCTION

2.1 Butler O'Neill has been commissioned by landowners Tony Looney and Edward Carey to prepare a submission to the Draft Cork City Development Plan 2022-2028.

2.2 This submission is framed within the context that the draft plan proposes that the subject lands are not suitable for development – despite being located 5 minutes from Bishopstown and the Wilton District Centre and 5 minutes from the key city town of Ballincollig the subject lands are somehow incredulously not part of the area earmarked for future development rather in located within a somewhat restrictive ‘hinterland’ designation.

2.3 This it is felt, is incongruous with its location directly adjoining the contiguous built-up area of the city at Bishopstown/Ballinaspig, existing residential uses as well as the town of Ballincollig. It is suggested the site should be zoned as within the ‘compact city’ area designated as ‘new residential neighbourhood’.

2.4 The forthcoming plan will be the principal planning document for the future development of Ireland’s Second City for the next 6 years and in the context of a changing urban environment where ambitious housing targets and employment growth have led to a greater need for residentially zoned lands in sustainable areas that are in close proximity to employment nodes in accordance with the National Planning Framework it is argued that the proposed lands are closer to schools and local services than residentially zoned land in the North East of the city or permitted developments in Ballingleanna Glanmire and as such the failure of the local authority to zone these lands is questioned. The subject lands are located along a future high quality public transport corridor and should in no way be de-prioritised for residential development over and above more peripheral lands to the north and south of the city in particular where there is no quality public transport provision planned [now or future].

2.5 The site in question spans circa 7 hectares and benefits from its proximity to the existing settlement of Bishopstown and Ballincollig – zoning land as suitable for development in the right places is not over-zoning. Only zoning enough land for development take place affects land prices, does not account for availability, and does not befit the legal obligation which Cork City Council has been tasked with ensuring Cork City doubles in size by 2040.

2.6 This submission considers the relevant national, regional, county, and local level planning policy contexts relating to the subject lands. Furthermore, statistical datasets in relation to housing, employment and development generally will be outlined to provide substantive justification for the ensuing recommendations.

2.7 The submission outlines that there exists an opportunity to further improve the pattern and nature of urban development within the Cork City functional area and its immediate environs and makes suggestions in relation to the area’s ability to accommodate projected growth within appropriate and sustainable locations with specific reference to the subject lands. The Hinterland area needs to be considered a ‘future growth /future development area’ if the population growth earmarked is to be achieved.

2.8 The report concludes by urging both the executive and reserved facets of the Local Authority to consider zoning the subject lands for residential development/future development. The site’s strategic location in close proximity to the existing city [Bishopstown] and the Key town of Ballincollig as well as employment and residential uses, highlights its suitability to accommodate projected growth. The submission concludes by requesting that the site is redesignated so that development can occur in a sustainable location in the

immediate to short term, as it may be a long period of time before the areas capable of taking large proportions of the proposed development [such as the Docklands] are developed because of infrastructure deficits.

2.9 The development of the subject lands in the timeframe of the next development cycle would provide much needed development within close proximity to well established residential communities, key employment areas, public transport hubs, existing infrastructure and local services and facilities.

2.10 The zoning of lands for development will provide for much needed additional housing units and employment growth within the area which is a sustainable location to accommodate future growth. Additional residential units within this area will assist Cork County Council in meeting their ambitious population targets and provide an ideal location for people in the Cork City area to live.



Figure 01 Site Outline

### The Site

2.11 The subject lands are strategically located near the existing settlement of Bishopstown to the immediate west of the Ardrosig area which is an area undergoing significant change at the moment with the recent grant [8<sup>th</sup> of September] of 276 units and a number of other sites in this area with extant or pending planning permissions/applications. The site is also near the Ballincollig area and the entire area between both settlements is suitable for development – the city boundary was expanded to allow for and facilitate growth, not constrain and restrict it.

2.12 The subject lands benefit from strong infrastructure links such as the N40 which leads to the Jack Lynch Tunnel. The area is also served by a bus route to the city centre. More significantly the area is set for a transformative public transport scheme introduced by CMATS which constitutes a light rail system [justified on the basis of a rail-based growth settlement strategy] starting in Ballincollig traversing close to the subject lands to the city centre and further southeast to its terminus in Mahon. It is contended that the growth

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strategy should be concentrated along this area to consolidate this national exchequer funding rather than in areas not served well by public transport such as Carrigaline. As such it is considered that as possible infill opportunities for residential development should be explored along [and in proximity to] public transport corridors in line with the principles of proper planning and sustainable development.

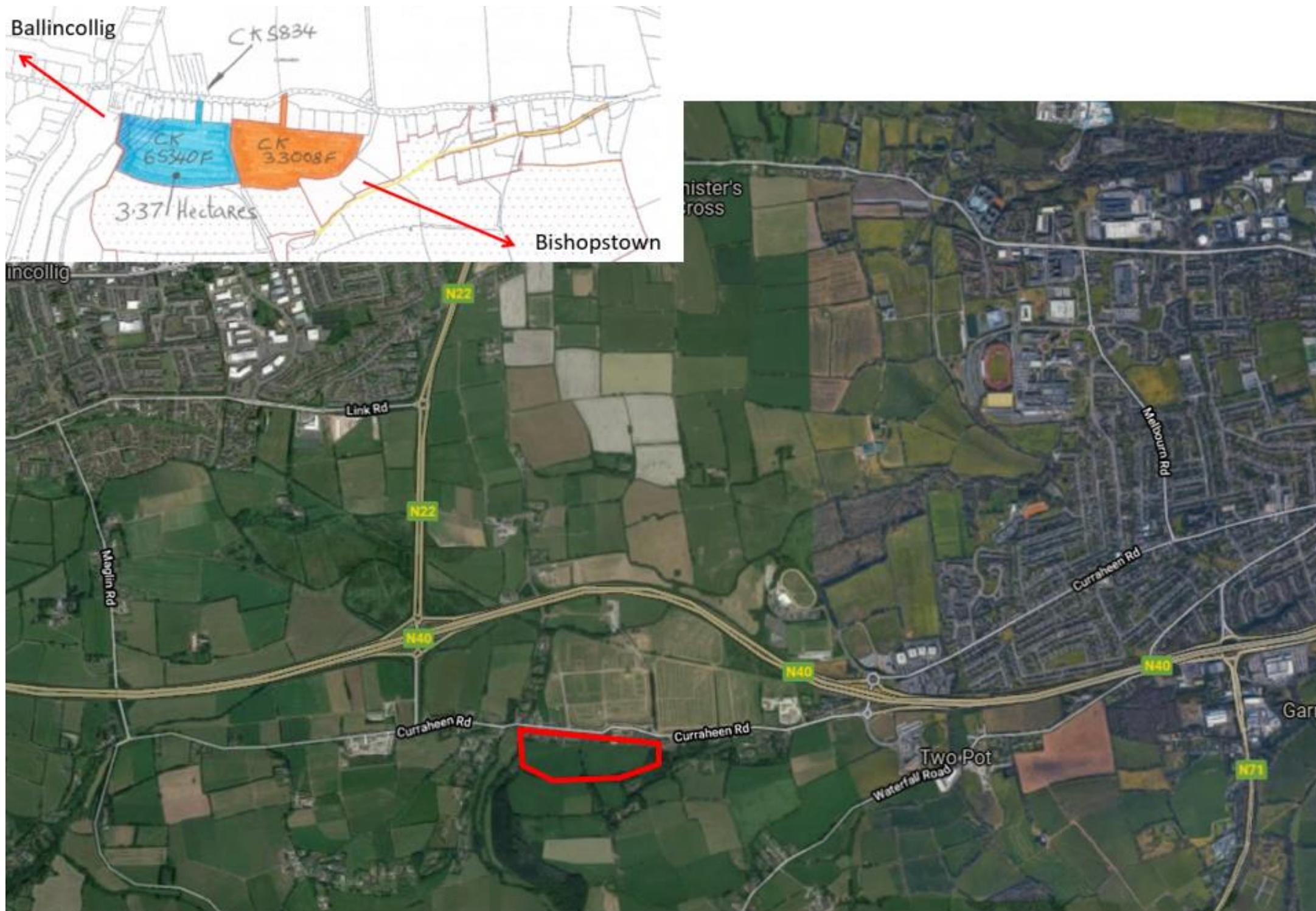


Figure 02 Outline of the Site within a more local context [Source: adapted from Google maps]

### 3.0 PLANNING POLICY CONTEXT

#### National Planning Framework

3.1 The 'National Planning Framework' provides the National Planning Policy Context for the proposed scheme [Ireland 2040], which succeeds the National Spatial Strategy. This document has legal standing and forms the overarching document in the hierarchy of plans in Ireland. It provides guidance for national planning priorities and streamlines relevant Government policies and informs investment on national and regional development imperatives.

3.2 The NPF is predicated on the assumption that by 2020 there will be an additional one million persons in Ireland and to effectively plan for and manage this growth it is important that key priorities are set out at the highest level to be implemented by all local authorities in the pursuit of a shared vision for the planning and development landscape of the country.

3.3 The key message of the 2040 NPF is threefold:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

3.4 National Planning Framework also has statutory bases. Unlike the National Spatial Strategy (NSS) 2002 which was not a legal document it was a 20-year spatial plan direct development and investment to those locations that had the infrastructural capacity to take development. It designated a series of hubs and gateways which were earmarked for significant growth which appeared to be an unpopular choice amongst those who were not within these areas and was an ineffective attempt to counterbalance the strong growth that had occurred in the Dublin region in the years leading up to the NSS.

3.5 The objectives of the NPF are applied on a regional basis through Regional Spatial and Economic Strategies [RSESSs]. These will also be statutory and will set out regional level aspirations for our key areas and growth centres.

3.6 According to the NPF "**There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside**" [2017:8] **The area in question is essentially an infill development.**

3.7 One of the key aspirations of the NPF is to address the issue of our regional cities and to ensure that all of the regional cities grow at ambitious rate. The NPF states that the regional cities of Cork, Limerick, Galway, and Waterford are growing but not at the scale or pace required to operate "as realistic alternatives to Dublin" and that this needs effective and coordinated action to remedy.

3.8 According to the document, The ESRI projects that the population of Ireland will increase by almost one million people or by 20% over 2016 levels, to around 5.75 million people by 2040 which will give rise to a need for an additional half a million new homes by 2040.

3.9 The ESRI is also projecting an additional 660,000 jobs to 2040 to occur and in line with international trends, that there will be a shift towards a knowledge economy as well as an expanding role for the services sector.

The NPF makes ambitious targets for the four cities outside of Dublin stating that: "Cork, Limerick, Galway and Waterford [need] to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale. This means enabling the four cities to grow by more than twice as much to 2040 as they did over the 25 years to 2016. Focusing investment to improve the collective 'offer' within each of the four cities, i.e., infrastructure, liveability and choice in terms of housing, employment and amenities."

City	Population 2016	Population Growth to 2040 <sup>27</sup>		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

Figure 03 Population Targets for Ireland's Cities [Extract Table 4.1 Ireland 2040]

3.10 The population targets in the NPF certainly set out in an ambitious aspiration for Cork, in order to achieve this, it states that Cork needs to be an internationally competitive and sustainable urban environment. The NPF is also quite strong in stating that Irish towns can accommodate a significant amount of future population growth. Ireland 2040 states that "There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth" [Ireland 2040:58].

3.11 National Policy Objective 9 states that : In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to: Agreement (regional assembly, metropolitan area and/or local authority as appropriate); Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services. [Ireland 2040:63].

3.12 It is contended that the development of infill serviced lands within development boundaries of towns and extensions of established built up areas of towns and settlements as proposed by this current zoning proposal addresses the key messages as outlined in the NPF and the achievement of the targets projected.

#### REGIONAL PLANNING CONTEXT

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3.13 The Regional planning context is provided by way of the Southern Regional Economic Spatial & Economic Strategy which is currently in draft form. The RSES sets out that by 2040 the population of the southern region will most likely grow by 380,000 to almost two million people rendering the need for a considerable amount of new jobs as well as new homes.

3.14 The RSES states that the region is well placed to capitalise on a changed approach. The RSES Vision is to:

- Nurture all our places to realise their full potential;
- Protect, and enhance our environment;
- Work to achieve economic prosperity and improved quality of life for all our citizens;
- Accommodate expanded growth and development in suitable locations; and
- Promote the region's international reputation as one of Europe's most creative, innovative, greenest, and liveable regions. [2019:23].

3.15 According to the RSES Metropolitan Cork has existing critical mass and is an emerging international centre of scale driven by the State's second city of Cork at the core supported by a network of metropolitan towns and strategic employment locations. It states that sustainable higher densities must be delivered, especially at public transport nodal points. National growth targets will see an additional 75,000 to 2031 (c. 283,700 population by 2031) in the City and Suburbs. The Rest of Metropolitan Area will see an additional 29,657 people by 2031 (c. 125,000 population by 2031).

3.16 In relation to housing and regeneration the RSES state that: "The sustainable growth of Metropolitan Cork requires investment into each of the following locations:

- (i) City Centre Consolidation and Regeneration (City Centre revitalisation, Cork North and South Docklands and Tivoli);
- (ii): Potential Light Rail Transit Corridor City Suburban Area (in addition to city centre area, nodal points and corridors on a potential Light Rail Transit Corridor from Ballincollig to Mahon via the City Centre, North and South Environs, District Centres, Glanmire and further regeneration and consolidation initiatives),**
- (iii):City and Suburban Area Expansion (active land management will be required to identify further development opportunities to facilitate sustainable, infrastructure led growth);**
- (iv): Metropolitan Towns on Rail Corridor: (Monard SDZ as a new metropolitan town requiring rail access and road access to the national road network, regeneration, compact growth and infrastructure led urban expansion areas in Midleton, Cobh, Carrigtwohill and Blarney);
- (v): Other Metropolitan Towns: (including Carrigaline). As such realising development on these lands is in line with the key aspirations of the RSES.

3.17 The central element of the strategy is on strengthening the Cork Metropolitan area and the Cork MASP element of the RSES it states that "Cork is emerging as an international centre of scale and is well placed to complement Dublin, but requires significantly accelerated and urban focused growth to more fully achieve this role"

### SUB-REGIONAL PLANNING CONTEXT:

#### CORK COUNTY DEVELOPMENT PLAN 2014

3.12 Currently the Cork County Development Plan 2014 provides the sub-regional planning context and a more local planning policy framework within which to contextualise the proposed rezoning justification. The lands

are within the Metropolitan Greenbelt an area designated as being under severe pressure from urban generated demand for housing owing to the proximity to the city centre.

3.13 The growth strategy articulated in the Development Plan aims to position Cork Metropolitan Area as:

- A principal complementary location to Dublin with a strong international role;
- A primary driver of economic and population growth in the region;
- A Metropolitan Area strengthening the vibrancy of its City Centre;
- A compact metropolitan area with increased regional connectivity; and
- A City Region focusing growth on the delivery of sustainable transport patterns.

3.14 The extension of Cork City Councils administrative boundary in May 2019, expanded the city by five times its previous size, increasing its population to 210,853 persons. Cork is now defined as a medium sized European Port City, comparable to Malmo, Bilbao, Aarhus and Bremerhaven in terms of scale and function. The NPF recognises this status, setting out bold new growth targets reflecting the city's critical role in enhancing Ireland's metropolitan profile. To effectively fulfil this role, the NPF requires the city to have ambitious vision that maximises its potential as an internationally competitive and sustainable growth city in a best practice European context.

3.15 The Cork boundary extension took the majority of 'Metropolitan Cork' into the City Council Functional area as it was considered that the city boundary [pre-extension] was too constrained and that the de facto city has expanded beyond the historic boundary and the constrained size was limiting the ability of Irelands second city to grow as a restrictive growth policy was in place around Metropolitan Cork. The boundary was expanded to allow for ambitious and much needed growth to happen in order to counterbalance the overconcentration of development happening in the Greater Dublin Area [areas over 45mins commuting distance to the city]. In order to achieve this – Cork is tasked with doubling in size between now and 2040. To do this sustainably all areas along good public transport corridors should be tenaciously pursued for residential development.

3.16 The Draft City Development Plan 2022-2028 highlights a number of very useful evidence bases for which to contextualise this submission and justify the redesignation of the subject lands.

**An Analysis of Housing Completions in Cork Since 1970**

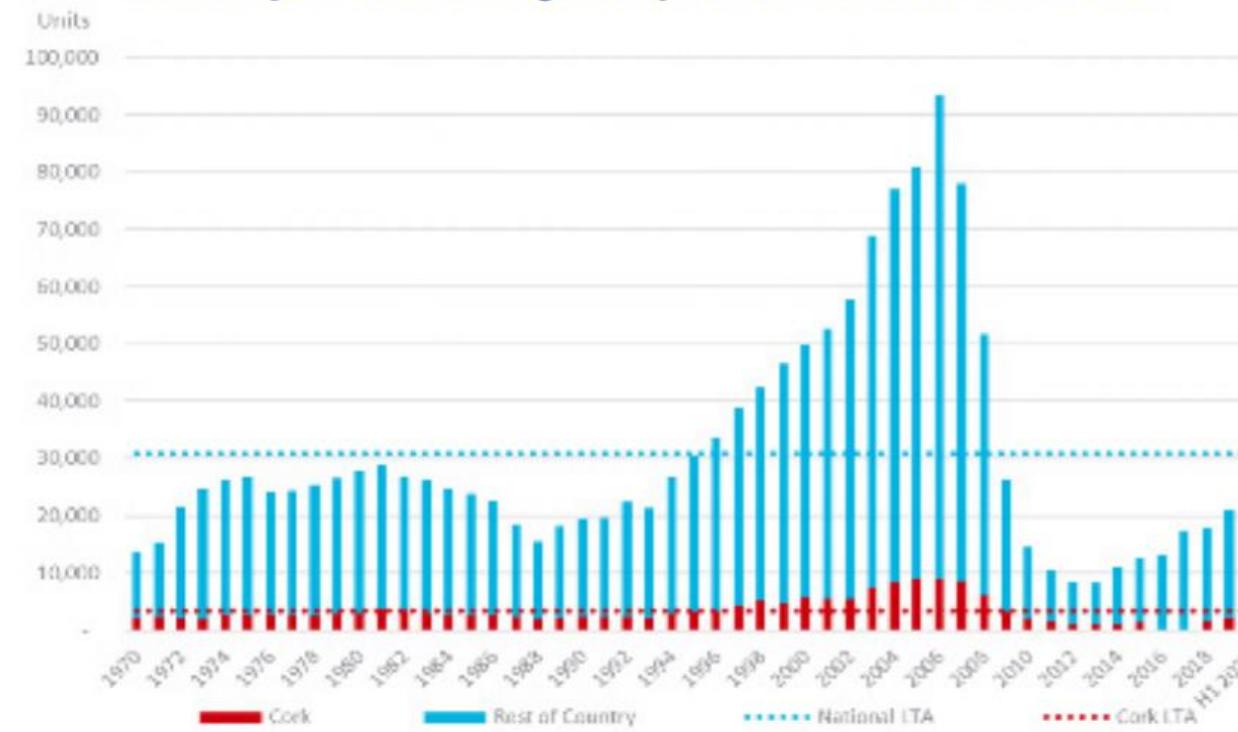


Figure 04 Housing Completions in Cork Since 1970

3.17 As can be seen from examining Figure 04, the number of houses completed last year and over the last few years in Cork is staggeringly low. Since the publication of the NSS in 2002 National Policy has dictated that the overconcentration of housing growth in the Greater Dublin Area needs to be balanced by significant growth in Cork. This simply has not been pursued with the vigour and tenacity [through the forward planning system] that it should be.

3.18 Development Management Planners can only react to the planning applications which are lodged. There is a need for the plan to be more ambitious and more serious about its obligation to be consistent with regional and national policy. Over zoning /overdevelopment is not problematic in the right places where there is a high-quality public transport system [particularly rail] in place. These areas will inevitably be developed that is good planning – zoning these areas with a restrictive zoning such as ‘hinterland’ is particularly damaging as it does not show the vision or long-term strategic view that was the reason for the boundary extension which was that this area is a ‘future development area’, ‘strategic growth area’ and [in the areas that benefit from quality public transport links] ‘new residential neighbourhood’.

3.19 The draft City Development Plan states that: “The delivery of Light Rail Transit (LRT) and its interaction with the Lee to Sea greenway, suburban rail network, orbital bus routes and strategic bus corridors will deliver transport orientated development in key areas such as Blackpool, Ballyvolane, Mahon and South Ballincollig and an integrated multimodal city transport system.... Longer term strategic planning and delivery of growth in areas such as Tramore Road, Stoneview and the lands located between the City and Ballincollig will further enhance the delivery of growth in Cork City and align with the NPF’s strategic objectives and population growth targets out to 2040.” Here it is clear that someone sees the logical development of these lands as sustainable. Every town around the Dublin City area does not have a buffer/hinterland, that is just the nature

of compact and sustainable urban development. The lands along the LRT should be promoted for development now in order to strengthen and support the delivery of same.

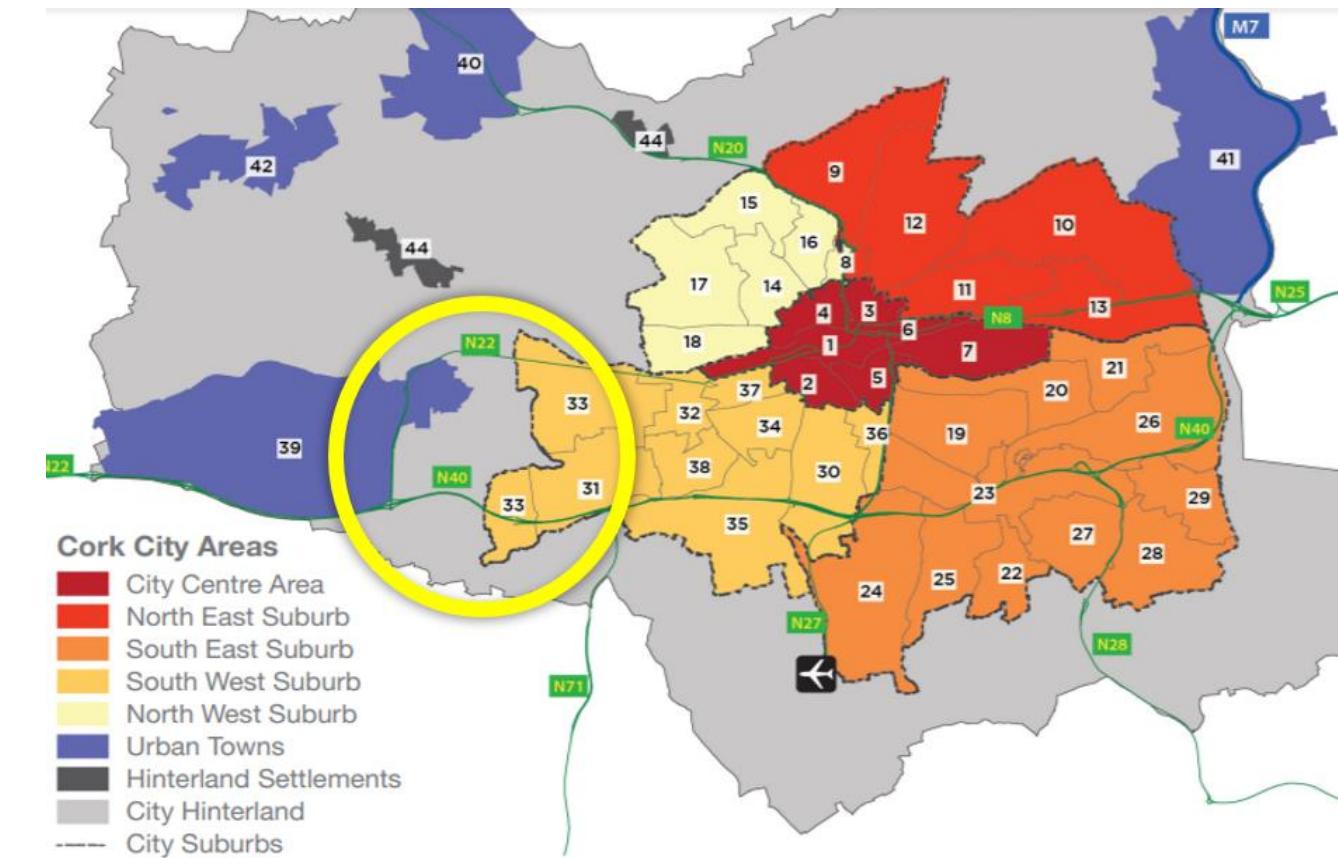


Figure 05 The subject area between Ballincollig and the City along the LRT corridor

3.20 As can be seen from the 2040 Concept Diagram South Ballincollig is earmarked as an Expansion Area with the lands north of the N40 Designated as a long-term growth area. The subject lands continue to be designated as hinterland when, in effect, the city to the north, east and west will have grown around it, leaving an undeveloped pocket along a quality public transport route – this is without logic.

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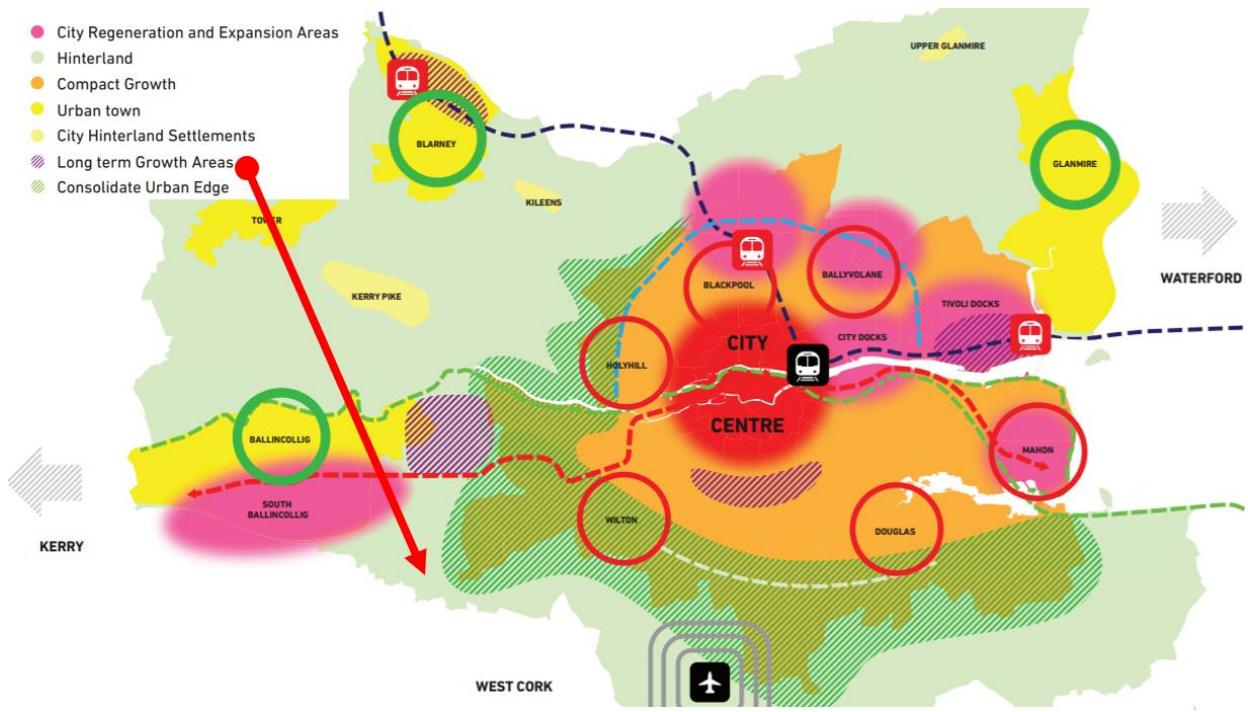


Figure 06 2040 Concept Diagram – Draft Development Plan [RED ARROW POINTS TO SUBJECT LANDS]

3.21 The long-term growth area should be expanded southwards to take in the entire area including the subject lands. The current pattern of development in this area is more heavily residential to the south of the N40. Figure 07 indicates the Hinterland area between Ballincollig and the western extent of the city centre within which the subject lands are located. The red areas [small dots] indicate the proliferation of housing which currently exists within the Greenbelt [future hinterland]. The area to the north of the N40 indicated in Figure 07 is earmarked as a long-term growth area. The area where the subject lands are located south of the N40 [also indicated in figure 07] are not despite this area being largely residential in nature.

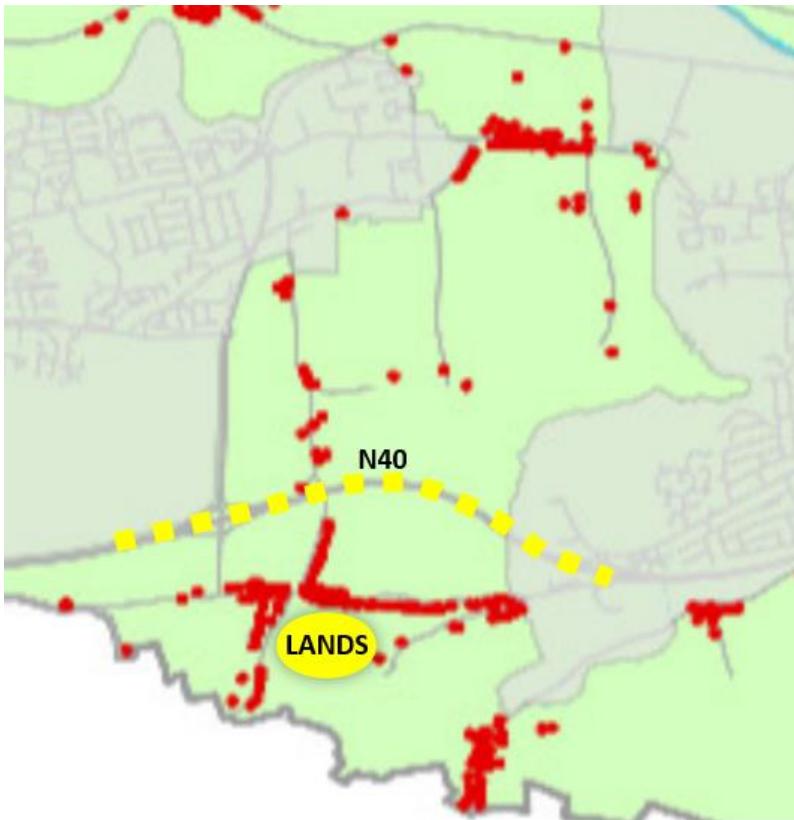


Figure 07 location of subject lands relative to existing houses & N40

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 <sup>2</sup>	100%	260,194	100%	49,580	24%

Figure 08 Core Strategy Table indicating growth targets to 2028

3.22 The delivery of the Docklands is [and should be] the key priority for Cork City Council [and Cork County Council as well as at a national level] it is 166 hectares of prime development land within a city centre and is a unique opportunity to deliver scale and quality development of an internationally recognised standard. The Seveso designations, the continued operation of Goulding's Fertiliser plant and the reliance upon the Port of Cork to keep to their timeline for the relocation of the Port of Cork, are all variables which Cork City Council cannot control which may affect the capacity of the Docklands to deliver the growth intended. There

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is no back up plan, the failure of the Docklands to deliver will result in a minimum under provision of 11% of the required growth [assuming all other areas grow as targeted]. It is understood that the relocation of the Port of Cork is contingent upon the M28 Motorway being developed, at judicial review stage construction has not even begun and, as such, it is contended that a contingency for the Docklands not being developed Growth Projections.

3.23 The Docklands should be developed as the number 1 priority – in Irelands second city the development of the docklands is an obvious aim and can and should happen in parallel to all other growth – it is suggested that contingency lands be zoned so that in the event of one or more failures to deliver available land in sustainable locations should be considered for development.

3.24 Figure 09 highlights the number of planning permissions [live commenced, live not commenced and in process] for residential development in the Cork City Functional area. It is contended that only the 3,173 figures [commenced units] is counted. The 5,263 could relate to a change of planning permission to the permissions granted and commenced/granted and live. They could relate to individual dwellings in the restricted hinterland area. The lodged permissions could also relate to live planning permissions.

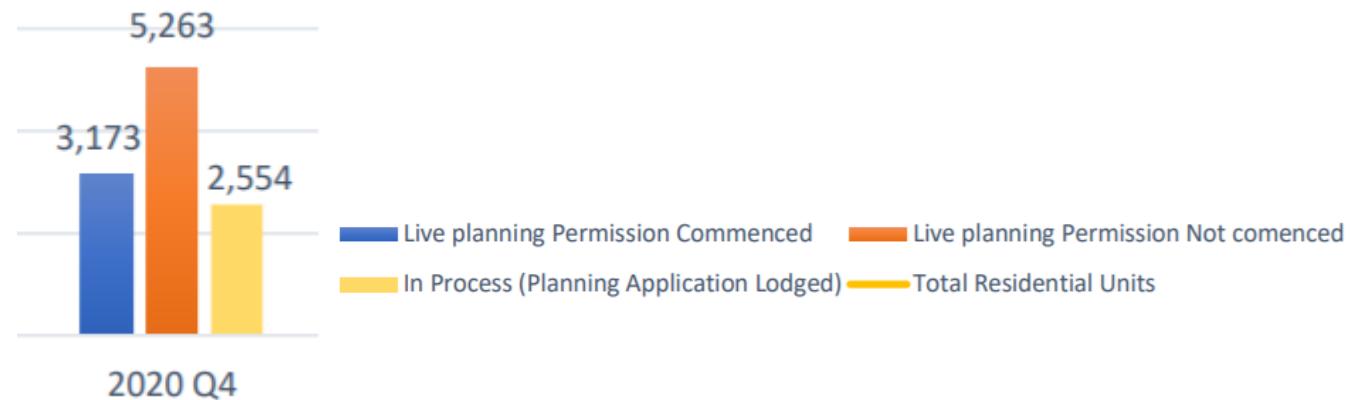


Figure 09 Overview of Planning Permissions in Cork City

## 5.0 THE SUBMISSION

Cork City needs to accommodate significant levels of sustainable growth according to the NPF. This can only be delivered by intervening actively to facilitate development to locate in areas close to existing transport infrastructure and existing employment. At present, the most accessible and deliverable housing opportunities are in the Metropolitan region and in particular along the rail corridor/future Light rail system, which has significant capacity to deliver urban housing that is well-located, sustainable and urban in nature. The successful achievement of the growth targets will require strong leadership from the forward planning section and active planning and management to release and realise. It is considered that there are a number of key arguments to be made in favour of the subject lands being designated for housing/future development in order to accommodate growth.

### The Current Context

- 5.1. The strength of demand for both rental accommodation and property for sale remains the most prominent feature of the housing market in Cork City and County, which is not surprising considering it is a major national employment and population centre. However, this demand is coupled with an ongoing shortage of available stock. In this regard, Sherry Fitzgerald recorded a 22% reduction since last year in housing stock supply in Cork, this is worrying and will undoubtedly ensure the rising pressure on rental and sales prices will be sustained.
- 5.2. 2020 and the first half of 2021 saw unprecedented upheaval across all of Irish society as a result of the Covid-19 pandemic. The housing market didn't escape this upheaval, with the number of homes put up for sale in the first of the year [2020] down by over 50%. While things improved in the third quarter of the year, as the economy reopened, the volume of listings in any given month never even matched the same month in 2019, let alone offered signs of catch-up. For the year as a whole, just 49,000 homes were advertised – the lowest total in over five years [recent data from Ronan Lyons - Daft Quarterly Report Q4 2020].
- 5.3. It would appear that there is a high level of demand for housing in Cork City and County, indicated by a low level of supply of high quality dwellings in both the rental and sales sectors and consistent quarter on quarter price increases - there is an extreme shortage of properties in the city which is having a consequent impact on the price of housing/accommodation to the extent that, we are now facing an affordability crisis in the private rental and sales sector.
- 5.4. It could be argued that this is due to the lack of supply of newly constructed units and the private rental sector is being overcrowded as a result this constrained supply is ensuring prices are kept inflated. There is an urgent need for proactive measures to remedy the current supply-side situation which is characterising and dominating the planning and housing landscape in the Cork City-region at the moment.

### Housing Targets

- 5.5. The Regional Indicators Report provides a useful contemporary statistic context upon which some of the high-level arguments pertaining to the subject lands can be framed which illustrates that the demand for housing is rising. The average household size in 2011 was 2.45 persons. This was down from 2.61 in the 2006 Census and now is up to 2.77 persons probably because of lack of housing availability as children are living with their parents longer etc. In general, the demand is for more units accommodating fewer people. The provision of a range of housing types and sizes in the city and metropolitan area will increase in importance as trends continue to show a decline in family housing and an increase in elderly and single person households.

5.6. The regional indicators report reveals that the key factors likely to influence this demand will be the delivery of Sustainable, Inclusive Neighbourhoods. Sustainable, inclusive neighbourhoods serve as focal points for the surrounding community with a range of services and facilities, typically in a vibrant and attractive physical environment. They are places where people want to live and work, now and in the future.

5.7. The quantum of population growth is then [taking account of average household size and density] translated into a corresponding housing unit target. Between now and 2028 the housing target for growth within the Cork City Council functional area is 49,580 persons.

HOUSING DELIVERY IN CORK CITY 2016-2019					
YEAR	2016	2017	2018	2019	TOTAL
<b>TARGET</b>	2,000	2,000	2,000	2,000	<b>8,000</b>
<b>DELIVERED</b>	299	414	599	731	<b>2,043</b>
<b>SHORTFALL</b>	1,701	1,586	1,401	1,269	<b>-5,957</b>

Figure 10 Overview of Housing Delivery in Cork City 2016-2019

- 5.8. It is considered that in the context of the failures to achieve the growth targets set out at a national [NPF], regional [RSES's] and local [Core Strategy City Development Plan] level, consideration of housing on lands such as the proposed lands are crucial to addressing the lack of provision of residential development in the Cork City area.
- 5.9. In order to achieve these ambitious targets and grow at the pace and scale prescribed for in national policy there needs to be more flexibility in zoning terms in certain instances as well as more land considered for residential development [in certain instances] and it is considered of national importance that in instances where land is available, well connected to public transport and serviced then development on said lands should be considered for development.
- 5.10. To address the tangible [and worsening] housing shortage it is considered that proactive and coordinated action needs to be taken to ensure that sites that are indeed suitable for residential development should be supported and that those sites that are serviced and readily available for development are not precluded from being developed because of restrictive zonings within 10/15 mins drive from Irelands second biggest city. development. Locating residential development in proximity to employment locations and public transport is imperative to achieving sustainable development.
- 5.11. **If the ambitious targets are to be achieved There is a need to address the disproportionate amount of houses vs apartments within the city and metropolitan area in accordance with the principles of planning and sustainable development.** Houses generally are lower density and as such are less sustainable than apartments. 85% Housing in Irelands Second City is not sustainable.

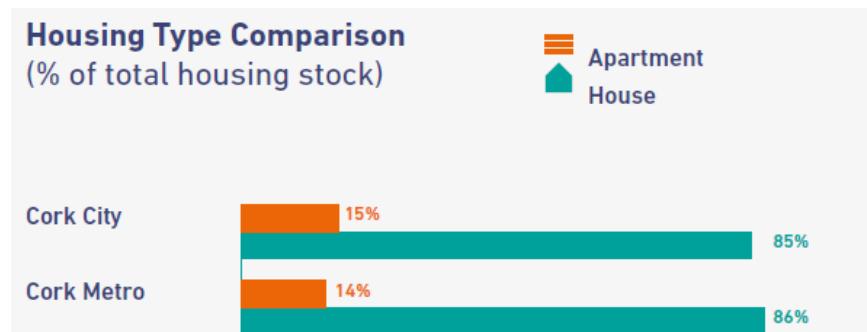


Figure 11 Breakdown of Housing Types [CSO]

5.12. Almost one million square ft of office space has been recently granted/is underway in the city at the moment [with more in Mahon and Little Island]

Developer	Location	Size
O'Callaghan Properties	Navigation Square Albert Quay	300,000 sq ft
John Cleary Developments	85 South Mall	49,514 sq ft
John Cleary Developments	Penrose Dock	247,570 sq ft
Clarendon and BAM	HQ @ Horgan's Quay	308,924 sq ft
Tower Holdings*	Prism on Clontarf Street	59,201 sq ft
<b>*38,255 sqft permitted at the Port of Cork site [not included]</b>		<b>Total 965,209 sq ft</b>

Figure 12 Recent Office Developments Completed/Under Construction in Cork City [Source Planning Enquiry System]

5.13. It is extremely unsustainable that the majority of these offices [if built occupied tomorrow] will be filled with people who will be commuting mostly by car to work as the majority of the new housing being built is in places like Carrigaline and Rural Glanmire. Whilst the Cork Metropolitan Area Transportation Strategy [CMATS] appears to address these issues of unsustainable transportation, the settlement strategy needs to align with the route of CMATS and be deliberately biased in favour of west-east development making Ballincollig, Bishopstown, the Docklands and Mahon the key future growth areas outside of the city centre. In simple terms, high quality housing is desperately needed in the city centre and in urban areas which are connected by green infrastructure/cycle routes. Zoning land [even in abundance] in the right locations has no negative impact however there appears to be a reluctance to zone in light of the over-zoning and overdevelopment issues that occurred in recent years, the only problem with that was that it was zoned in the wrong places.

5.14. Ireland 2040 was special for Cork as it outlined a clear hierarchy for the urban centres outside the capital, with Cork being promoted as the State's second city of international scale, fulfilling a nationally important role in counterbalancing the greater Dublin area. Limerick, Galway, and Waterford, in turn, are designated as key regional centres, and important locations for supporting the regional development agenda. Cork City alone is expected to accommodate population growth in the order of 55% [115,000], which equates to the combined growth of Limerick, Galway, and Waterford cities over the next 25 years.

5.15. This is both a massive challenge and a huge opportunity for Cork; accommodating another 115,000 people in Cork City means achieving an average annual growth rate of 2.3% over the next 24 years; by comparison, the average annual rate of growth over the last 24 years was only 0.8% [34,600 total]. This is an enormous

development and regeneration opportunity, requiring the provision of thousands of new homes and jobs in appropriate locations across the city region [Brady:2017].

5.16. Ireland 2040 was refreshing and hopeful as was not just concerned about population growth per se — as a planning vision, it was equally concerned with how and where this growth will occur. It took a very strong position in tackling suburban sprawl and dispersed development, and for the first time introduced national policy that prioritised the use of undeveloped and vacant sites in the urban centres; for Cork, these national targets require the provision of additional housing to accommodate 2,400 people every year up to 2040 — within the existing built-up area. Ireland 2040 quite correctly promotes policy for much more compact cities and towns, promoting developments in line with core planning principles relating to quality of life, access to services and public transport, place-making, employment-led growth, and environmental quality. By introducing defined targets for limiting suburban sprawl and dispersal, it is taking an ambitious step, and it means revisiting the way in which our urban areas have been evolving over the last few generations. However, 2 years since its publication we are still not meeting the targets prescribed in Ireland 2040. The new City Development Plan presents an important opportunity to guide Cork City sustainably to a situation of growth.



Figure 13 The Hinterland between Ballincollig and Bishopstown area is connected and essentially consolidating the urban edge

5.17. There is a real danger that in the attempts to solve the current housing crisis, there will be pressure to overlook the need for sustainable, appropriate forms of development. There is very little to be gained by trying to solve the housing crisis simply using a broken model based on "delivering units anywhere" rather than "making successful neighbourhoods" and there is a real possibility that development will be facilitated outside the city council area in the functional area of Cork County Council if sufficient land for housing is not made available. In a single housing market houses for sale in Bishopstown west or Ballinhassig will attract the same potential purchaser looking to travel to the city for work each day.

5.18. According to the Draft City Development Plan the Hinterland, if developed, will create sprawl, it states: "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." The subject lands are in-between two established built-up areas filling in this gap [figure 13] could be considered to consolidate the urban edge rather than constituting sprawl.

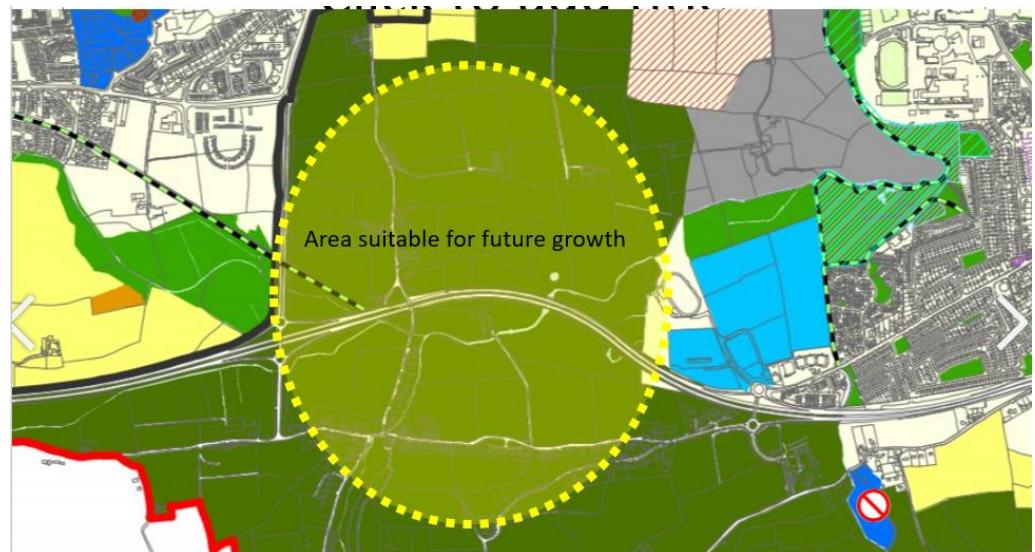


Figure 14 Area Between Bishopstown and Ballincollig suitable for development

## 6.0 CONCLUSION

6.1 Tony Looney and Edward Carey are pleased for the opportunity to make this submission to the Draft Cork City Development Plan 2022 and trusts that the evidence presented outlines the suitability of the subject site for inclusion within the Long-Term Growth Area zoning designation/ with a 'New Residential Neighbourhood Zoning Designation'

6.2 The information contained within this submission provides a comprehensive review of the suitability of the lands to accommodate some of the projected growth for Cork City framed within a number of 'bigger picture' arguments.

6.3 A key obstacle to providing residential development in the past has been the need for key infrastructure provision. The delivery of which can be cost prohibitive and therefore stall residential development. The lands in question are well positioned to accommodate some growth. There is no contingency built into the plan for the failure of the Docklands area to be developed in the short term. This has been an aspiration of Cork City Council since the publication the 1999 development plan. Not much has happened in residential terms in the last 20 years [bar aspirational planning applications] and as such it is highly recommended that the development of the subject lands be considered for residential development.

6.4 As has been demonstrated in this submission, there is a strong case, evidenced through adopted planning policy documents specifically the NPF, RESEs, the Cork City Development Plan and parts of the Draft Plan that there are ambitious and very challenging housing targets for Cork and the subject lands with their strategic location could and should be providing a proportion of the required housing units.

6.5 This submission makes several planning arguments in favour of the alteration of the current zoning designation of lands located at

6.6 In the context of the significant supply-side challenges currently facing both the housing and planning sectors, evidence is presented in this submission that substantiates the view that more proactive measures are needed

in order to meet the population and housing targets as well as employment targets set out at a regional level. One of the solutions to this is to zone appropriate land which is developable in the short term.

6.7 In conclusion and in light of the evidence presented and, ultimately in the interest of proper planning and sustainable development the submission strongly recommends that the subject lands be designated as EXISTING BUILT-UP AREA.

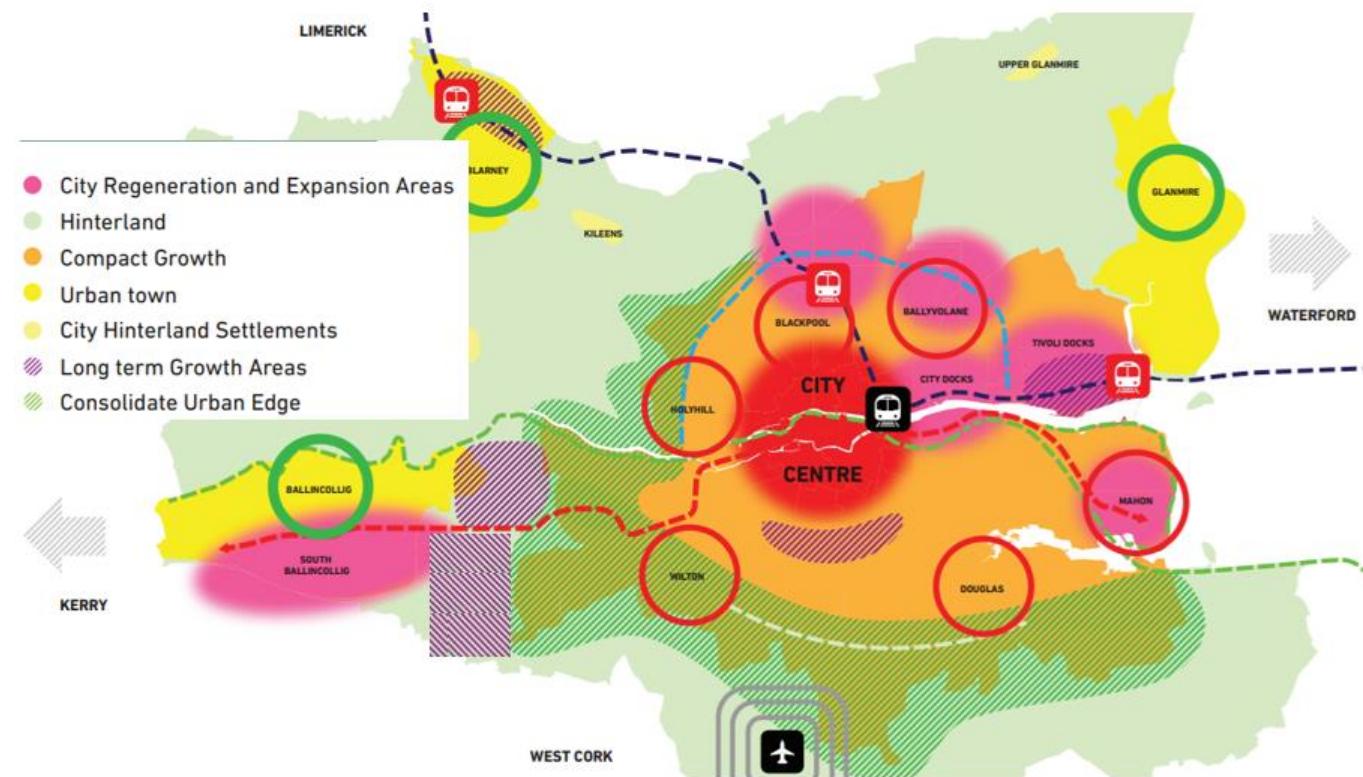


Figure 15 Suggested Amendment – add west Bishopstown/subject lands as a 'long term growth area'

THE END

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