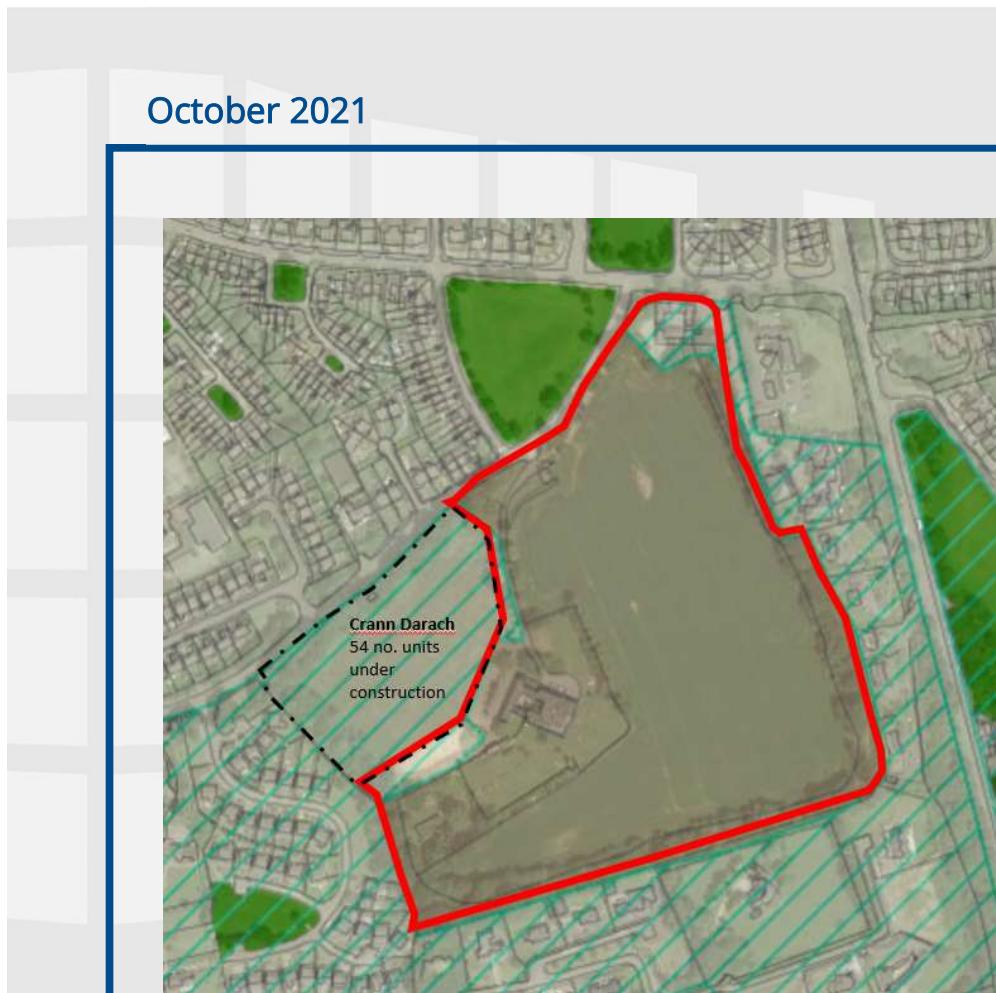


# Submission to Draft Cork City Development Plan 2022-2028

Lands at St. Dominic's Retreat Centre, Montenotte



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## Document Control Sheet

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## 1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of the St. Dominic's Retreat Centre in relation to their lands at Ennismore, Montenotte, Cork.

In accordance with section 12(2)(b) of the Planning and Development Act 2000, we are making a submission to Draft Cork City Development Plan 2022-2028 in relation to our client's lands at Montenotte. This submission will address the following issues:

- That the northern portion of our clients' lands be re-zoned as 'ZO-01 Sustainable Residential Neighbourhood' to allow for the sustainable development of these lands in compliance with the Draft City Development Plan's strategy for compact growth in the City; and
- That a more flexible approach to Landscape Protection Zones within the new Development Plan would facilitate an active management approach rather than a presumption against development on their remaining lands to the south of the retreat house.

The submission is set out as follows:

1. Introduction
2. Site Context
3. Planning Policy
4. Rationale for Submission Request
5. Summary

## 2. Site Context

The lands are bounded to the north and access from the Middle Glanmire Road. The site slopes from the northwest of the site towards the south east corner. Mature planting surrounds the site with established residential use adjoining the site on its east, west and southern boundaries. At the centre of the site is St. Dominic's Retreat Centre which is located at 'Ennismore House', a protected structure.



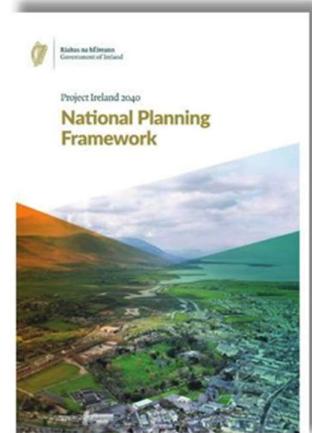
Figure 1: Site context map. Site outlined in red.

In recent years, planning permission was granted for 44 no. units on the lands to the northwest of the retreat centre, Ref. No. 17/37608. A Part 8 permission was subsequently granted for 54 no. units and is currently under construction. Crann Darach will provide a mix of social and affordable housing.

### 3. Planning Policy

#### 3.1 Project Ireland 2040 – National Planning Framework (NPF)

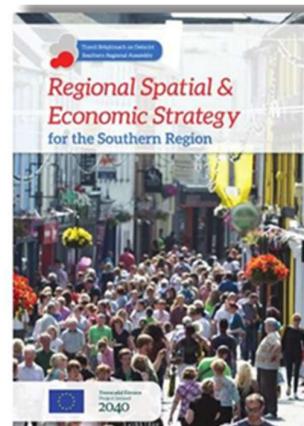
In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027. The NPF provides a planning policy framework for Ireland up to 2040. A key facet of the plan is to counterbalance the dominance of the Dublin Region by strengthening development across the south, in particular across Cork, Limerick and Waterford. With specific regard to Cork, the NPF recognises 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".



The growth rate identified for Cork City and surrounding suburban areas is 50-60% up to 2040, which is two to three times higher than the national average. Cork is expected to increase its population by 125,000 by 2040, which will require the provision of additional housing to accommodate 2,400 people every year up to 2040. In this regard, the NPF identifies ten National Strategic Outcomes (NSO), the first of which is compact growth. There is a specific requirement for **at least 50% of growth** in cities including Cork to be located within/close to the existing built up area, on brownfield land or infill sites. This will enable the sustainable use of currently under-utilised land, with higher housing and employment densities

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

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



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

RSES places a strong emphasis on the expansion of the Metropolitan Cork area through the advancement of compact growth.

### 3.3 Draft Cork City Development Plan 2022-2028

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

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

The Draft Plan is focused around the 9 no. Strategic Objectives which include:

#### *SO1 – Compact Liveable Growth*

*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.*

#### *SO2 – Delivering Homes and Communities*

*Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods.*

#### *SO9 – Placemaking & Managing Development*

*Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where placemaking is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects character of the city and neighbourhood.*

Under the draft plan residential zoning has been divided into 3 tiers. ZO1 relates to "Sustainable Residential Neighbourhoods" with the objective being "*To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.*". Under this objective the following is also noted in the Plan:

*ZO 1.1*

*The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City's built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents.*

**ZO 1.2**

*Development in this zone should generally respect the character and scale of the neighbourhood in which it is situated. Development that does not support the primary objective of this zone will be resisted.*

**Objective 3.3** of the Draft Plan relating to **New Housing Supply** states that:

*Provision will be made for at least 17,118 new homes to be built in Cork over the Development Plan period.*

**Objective 3.4** of the Draft Plan states the following in relation to **Compact Growth**:

*Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided on brownfield sites in Cork.*

The lands at St. Dominic's Retreat Centre are zoned ZO 18 Landscape Preservation Zone where the following objective applies:

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

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

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

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

*"Many of these sites have limited or no development potential due to their landscape character. These is a presumption against development within this zone, with development only open for consideration where it*

*achieves the specific objectives set out in Chapter 6 Green and Blue Infrastructure, Open Space and Biodiversity.”*

Reference NE13 in Table 6.7 of the Draft Plan provides the following in site specific objective in relation to the lands at St. Dominic's:

- *To reinstate the historic landscape setting of Ennismore House;*
- *To seek development of a new Neighbourhood Park (with public vantage point) to serve the needs of the North-East of the city;*
- *To allow for a small amount of development at the northern edge of the proposed Neighbourhood Park in the event that the City Council considers this an essential part of any landscape masterplan to provide natural supervision.*

### 3.4 Cork City Landscape Study 2009

As part of the review of the Cork City Development Plan 2004, the Council commissioned Mitchell & Associates to prepare the Cork City Landscape Strategy 2008 (CCLS) to inform the 2009 City Development Plan. The purpose of the CCLS was to build on, and further define those areas which were considered important in making a contribution to the city's landscape setting and character, and its sense of place, and enhance the general quality of life. In addition, it put forward a series of recommendations, both practical and policy based, to aid the preparation of the CCDP, as well as guide development control and landscape management policies. It also identified 7 key sites which were studied in detail, including illustrated examples showing how to integrate development in the varying contexts.

The CCLS acknowledges that the landscape in the city is not static. It is constantly evolving, particularly as the uses, land development and regeneration change to meet the demands and needs of the growing population, and as a driver of economic, physical and social growth. The strategy was intended to illustrate how to integrate development while maintaining and enhancing the character of the existing landscape assets in the city. Section 5 of the report further states that the majority of the policies contained in the CCDP 2004 were adequate in their provision of protection, enhancement and management of the landscape assets in the city, though further improvements were required to tree protection and management, and landscape protection.

The CCLS 2008 undertook a brief analysis of the lands at St. Dominic's stating that:

*The historic house and estate should be treated in a sensitive manner and any development on the site should be appropriate to the local surroundings.*



Figure 2: Extract from Cork City Landscape Strategy.

## 4. Rationale for Submission Request

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

The specific policy objective which relates to the site in the Draft Plan, and is unchanged since the Landscape Preservation Zones were first introduced, outlines 3 site specific objectives.

*To reinstate the historic landscape setting of Ennismore House*

From our review of the CCLS and historic mapping of the area, it would appear that there were no distinct landscape features central to the site. There appear to be mature trees along the boundaries, which is consistent with what exists today.

A modest number of trees appear to have forms part of the wider grounds.

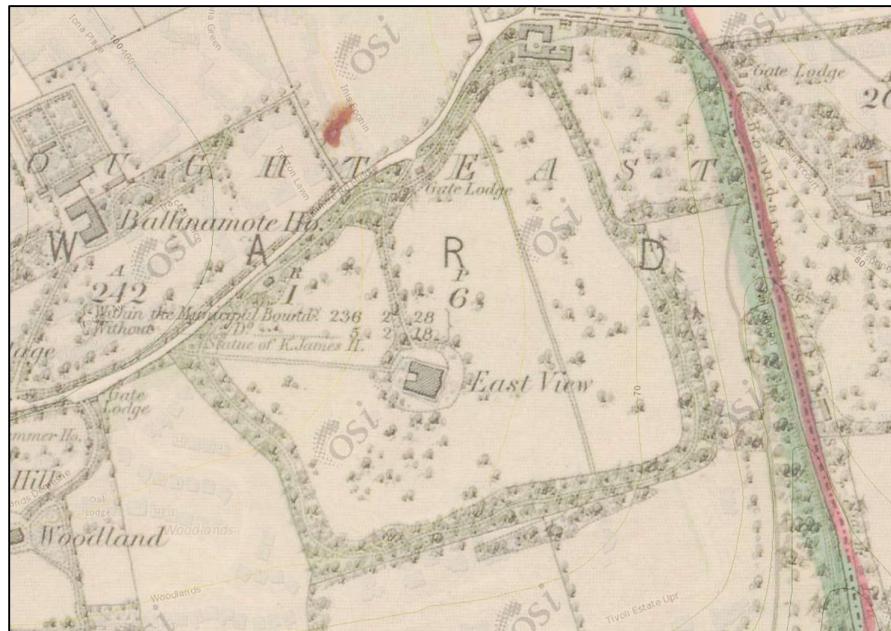


Figure 3: Historic Map 6 inch Colour (1837-1842) of the site

We consider that this objective implies that significant works would be required to reinstate the historic landscape which has only modestly changed with the most significant planting along the boundaries remaining intact.

*To seek development of a new Neighbourhood Park (with public vantage point) to serve the needs of the North-East of the city.*

The objective to provide a neighbourhood park has not been achieved despite this objective being in place since 2009. We submit that this objective will not be met outside as part of a comprehensive scheme for development.

*To allow for a small amount of development at the northern edge of the proposed Neighbourhood Park in the event that the City Council considers this an essential part of any landscape masterplan to provide natural supervision.*

While this approach to development may have been considered acceptable when this objective was originally introduced in the 2009 City Development Plan, it does not fulfil the current requirements for compact growth in the City. The Guidelines for Sustainable Residential Development in Urban Areas require a net density of 35-50 units per hectare in required on institutional lands.

We consider that the current and proposed zoning of our client's lands as 'Landscape Preservation Zone' is inconsistent with the wide objectives for compact growth in the Draft Development Plan which supports the delivery of new housing within the City's existing footprint.

Having regard to the views illustrated from St. Dominic's (Ennismore House) in the CCLSP, we submit that the northern portion of the lands currently identified as a LPZ are suitable for development.

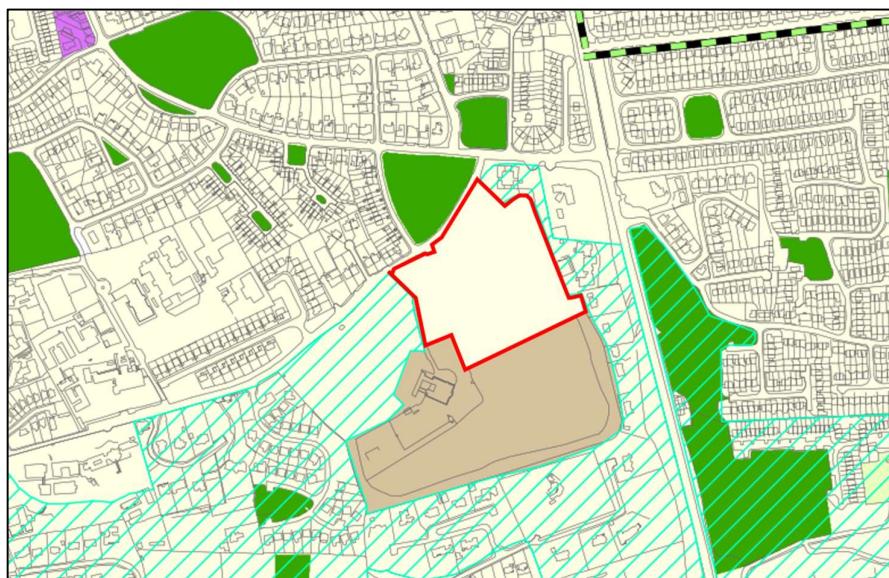


Figure 4 Area proposed for ZO-01 zoning outlined in red.

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

#### **Deliverability**

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

The site is located within an established part of the City that is fully serviced and accessible via existing infrastructure.

#### **Accessibility**

The accessibility of new development, both in terms of access to services and existing and proposed transport routes should be a key principle in terms of zoning lands for development in the forthcoming development plan.

Bus stops are also already in place within close proximity to the lands which benefit for a regular bus service to Cork City centre and beyond on Bus Route 208 which offers a regular service every 10 minutes during the day.

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

#### **Consolidation**

The principles of the NPF and RSES are to promote compact growth within the existing built up area of urban settlements. In line with this principle, future zoning should prioritise areas which consolidate existing and permitted developments. The site is located adjacent to an established residential area. To the west of the site, construction of 54 no. residential units is currently underway. This site would further contribute to the need for housing in this part of the City.

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

## 5. Summary

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

We submit that the interest of sustainable development and compact growth within established areas of the City, there is a unique opportunity on our clients lands to contribute to the strategic objectives of the Development Plan. For this to be achieved, we proposed the following amendments to the Draft Development Plan:

- That the northern portion of our clients' lands be re-zoned as 'ZO-01 Sustainable Residential Neighbourhood' to allow for the sustainable development of these lands in compliance with the Draft City Development Plan's strategy for compact growth in the City; and
- That a more flexible approach to Landscape Protection Zones within the new Development Plan would facilitate an active management approach rather than a presumption against development on their remaining lands to the south of the retreat house.

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