



COAKLEY O'NEILL
town planning

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


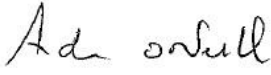
Former CMP Dairy site (known as Creamfields)
Tramore Road and Kinsale Road, Cork

Prepared in October, 2021 on behalf of
Watfore Ltd.

Coakley O'Neill Town Planning Ltd.

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1.0 INTRODUCTION

- 1.1 We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, are instructed by, Watfore Ltd. (the fully owned property subsidiary company of Dairygold Co-operative Society Ltd.), to make this submission to the Draft Cork City Development Plan 2022-2028 in respect of the former CMP Dairy site known as Creamfields on the Tramore Road and Kinsale Road, Cork City.
- 1.2 Under the Draft Cork City Development Plan 2022-2028, the subject site is proposed to be zoned ZO 02 "New Residential Neighbourhoods". The site is currently zoned ZO 4 "Residential, Local Services, and Institutional Uses", having been rezoned in 2019 from "Light Industry and Related Uses" as a result of Variation No. 6 of the *Cork City Development Plan 2015-2021*.
- 1.3 Our clients welcome and are very supportive of the draft residential zoning for the subject site. This submission is focused on the rationale for retaining 2no. objectives in respect of supporting (a) tall buildings where they are accessible to a high quality public transport system which is in operation or proposed and programmed for implementation, and (b) increased densities and heights on larger development sites (>0.5 hectares in size) capable of generating and accommodating their own character in the new City Development Plan, consistent with paragraphs 16.37 and 16.41 of the current Cork City Development Plan.
- 1.4 The overall objective is to provide a city-wide policy framework that can respond to the unique opportunities that some large brownfield sites may present, such as those located in transitional areas of the city where residential areas are expanding and where the relocation of industrial and light industrial uses creates regeneration opportunities. The rationale is that the management of the redevelopment of such sites can necessitate the requirement for a more nuanced, site-specific and thus flexible approach and that such redevelopment opportunities cannot necessarily be foreseen when a Development Plan is being reviewed.

2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The subject site is a large brownfield site c. 2.94ha in area and is bounded to the north by Tramore Road (and faced by the Independent Park sports complex), to the east by Kinsale Road – a generous urban highway that forms a vital connection between the city and South Cork – and to the south and west by a convenience retail store and two large warehousing logistics complexes belonging to the Musgrave Group and Allied Foods. The northern section (60%) of the site is level, while the southern section gently slopes away towards Tramore River, which is located further to the south of the adjacent convenience retail store.
- 2.2 The subject site has direct access from Tramore Road and is well connected to the entire south of the city via all modes of transport, including walking and cycling infrastructure. Tramore Valley Park, a large recently opened regional public park within the Cork Metropolitan area, is located 300m east of the site. The wider surrounding site context is characterised by a large variety and mixture of footprints, from well-established residential suburban housing to box retail, sports and recreational open space, warehousing, and public transport facilities. The urban grain of the box retail, as well as the Black Ash Park and Ride public transport facility which connects the area by bus with the City Centre, and warehousing units, which lie to the east

and south of the site can be described as monolithic buildings surrounded by large open-air car parks and other underutilised land. The movement between these zones/buildings is predominantly by car, which leads to little or no pedestrian movement or civic engagement.

- 2.3 In contrast to this, the three residential areas to the north-west and north-east – Ballyphehane, Turner’s Cross and the South Douglas Road – are long-established suburban neighbourhoods dating from the early and mid-twentieth century, where the open space and civic and communal buildings create and support a high degree of pedestrian permeability and sense of community.



Figure 1. Subject site (generally outlined in red). (Source: OSI; Annotated by Coakley O'Neill Town Planning Ltd., 2021).



Figure 2. View of the entrance to the site from the north-west.



Figure 3. View of the site from the north-east at the junction between Kinsale Road (left middleground) and Tramore Road (right middleground).



Figure 4. Internal view of the site looking south-east from inside the site entrance on Tramore Road.



Figure 5. Internal view of the northern section of the site, looking west.

3.0 PLANNING POLICY PROVISIONS

This submission is made in the context of the following key proper planning and sustainable development provisions of national, regional and current and draft local planning policy.

3.1 National Planning Framework (2018)

3.1.1 The National Planning Framework (NPF) was published in February 2018 and sets out the long-term spatial development strategy for Ireland up to 2040.

3.1.2 The NPF is guided, in part, by the aim to achieve regional parity in the country by significantly growing the population of both the Southern Region and the Northern and Western Region over the next two decades to counterbalance the dominance of the Greater Dublin Area.

3.1.3 In relation to Cork, the NPF sets a population growth target of at least 50-60% for Cork City and its suburbs by 2040. This is to facilitate Cork becoming a city of scale so that Cork can become competitive with Dublin, as well as with other comparable European and UK cities of similar scale. These population growth projections equate to approximately 324,000 people living and working in the city and suburbs and will mean enabling the city to grow by twice as much to 2040 as it has over the past 25 years.

3.1.4 The preferred spatial development approach contained in the NPF is to provide as compact an urban environment as possible through the reuse of previously developed brownfield sites, the development of infill sites and the redevelopment of existing underutilised sites.

3.1.4 Key future growth enablers for Cork outlined within the NPF include the following:

- Identifying infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects;
- The development of a much-enhanced Citywide public transport system to incorporate, subject to further analysis, proposals for an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport;
- Improved traffic flow around the City which, subject to assessment, could include upgrade of the N40, and/or alternatives which may include enhanced public transport.

3.1.5 National Strategic Outcome 1 "Compact Growth" of the NPF is aimed at consolidating and densifying future urban growth and development within existing settlements and their built-up footprints.

3.1.7 National Strategic Outcome 4 "Sustainable Mobility" is aimed at facilitating a move away from polluting and carbon intensive propulsion systems towards new technologies, as well as facilitating an increase in the patronage of public transport and supporting modal shift towards greater levels of walking and cycling as transport mode choices.

3.1.8 National Policy Objective (NPO) 1a is aimed at ensuring that the projected level of population and employment growth in the Eastern and Midland Regional Assembly area (which contains the Greater

Dublin Area) will be at least matched by that of the rest of the country. This national policy objective is informed by the concept of regional parity, where the targeted growth of the rest of the country should exceed that of the Eastern and Midland Region.

3.1.9 NPO 1b states that the Southern Region of the country is to have an additional 340,000 - 380,000 people, i.e. a population of almost 2 million by 2040.

3.1.10 In the context of Cork, NPO 2a translates to a target of half (50%) of future population and employment growth in Cork to be focused in Cork City and its suburbs.

3.1.11 Similarly, NPO 3b means that at least half (50%) of all new homes to be developed in Cork City and its suburbs should be delivered within the built-up footprint of the city and its suburbs. This is to be facilitated through the Cork Metropolitan Area Strategic Plans (MASP).

3.1.12 NPO 4 aims to ensure the creation of attractive, liveable, well designed, high quality urban places for diverse, integrated communities where a high quality of life and well-being can be enjoyed.

3.1.13 NPO 5 dictates that cities and towns should be developed to sufficient scale and quality to be able to compete internationally and to be drivers of national and regional growth, investment and prosperity.

3.1.14 NPO 6 seeks the regeneration and rejuvenation of cities, towns and villages 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;

3.1.15 NPO 7 of the NPF advocates for, amongst other things, addressing:

the legacy of rapid unplanned growth by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes.

3.1.16 NPO 11 is as follows:

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

3.1.17 NPO 27 is aimed at ensuring the integration of safe and convenient alternatives to the car into the design of communities by prioritising walking and cycling accessibility.

3.1.18 NPO 32 is as follows:

To target the delivery of 550,000 additional households by 2040.

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

3.2.1 The *Regional Spatial and Economic Strategy for the Southern Region* (RSES) was formally adopted in January 2020 and sets out a twelve-year development plan for the Southern Region based on the strategic objectives of the NPF. The strategy acknowledges that, by 2040, it is likely that the population of the region will grow by 380,000 people to almost two million and that Cork is projected to be one of the fastest growing areas in the state over the next 20 years.

3.2.2 One of the key principles guiding the RSES is the need to provide adequate quantities of quality housing for existing and future housing demand in locations that are accessible to employment and services, and which are located along sustainable and public transport corridors.

3.2.3 Regional Policy Objective (RPO) 8 of the RSES is aimed at encouraging “Investment to Deliver on the Vision for Metropolitan Areas”, and part b. of RPO 8 states the following:

Prioritise the delivery of compact growth and sustainable mobility in accordance with NPF objectives.

3.2.4 RPO 10 of the RSES addresses the issue of compact growth and commits to the prioritisation of housing and employment development in locations within and contiguous to existing city footprints which can be served by public transport, walking and cycling.

3.2.5 RPO 34 is explicit about promoting regeneration of brownfield lands over greenfield lands across all tiers of urban settlements including smaller towns and rural villages.

3.2.6 RPO 151b is as follows:

Residential development will be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.

3.3 Cork Metropolitan Area Strategic Plan

3.3.1 Included in the RSES for the Southern Region is the Cork Metropolitan Area Strategic Plan (MASP). The MASP aligns with policies and objectives contained within the NPF.

3.3.2 The Cork MASP includes the following strategic goals:

- Goal 1: Sustainable Place Framework
- Goal 2: Excellent Connectivity and Sustainable Mobility
- Goal 4: High Quality Environment and Quality of Life

3.3.3 Amongst other matters, Cork MASP Policy Objective 2 seeks investment to achieve regeneration and consolidation in the city suburbs and to strengthen Social and Community Development.

- 3.3.4 The MASP also states that economic and social regeneration in disadvantaged areas is important so growth and prosperity in a rising city is socially inclusive, providing opportunities and enhanced quality of life for all. One of the Guiding Principles of the Cork MASP is Social Regeneration, and is as follows:

Realise opportunities for social as well as physical regeneration, particularly in areas with pockets of deprivation such as RAPID areas.

- 3.3.5 Cork MASP Policy Objective 22 is further focussed on social inclusion, with part (b) being as follows:

Seek continued investment in initiatives that achieve the physical, economic, social and environmental regeneration of disadvantaged areas in the City and Metropolitan Area, in particular supporting the ongoing regeneration of the Cork City RAPID areas of Fairhill/Gurranebraher/Farranree, Knocknaheeny/Churchfield, Mayfield/ Blackpool/The Glen and Togher/Mahon.

- 3.3.6 The Cork MASP specifically identifies Tramore Road as being an “Example Regeneration Area” within Cork city.

- 3.3.7 The MASP contains population growth targets for 2031 that are consistent with those in the NPF that are set for 2040. According to section 5 of the Cork MASP, Cork City and Suburbs are to grow by 75,000 by the year 2031, with a target population of 283,669 for that year.

- 3.3.8 The MASP states the indicative potential residential yield of Cork Suburban Areas as being 3,986 units (with this figure likely to grow as further “windfall” sites emerge), and briefly describes Cork Suburban Areas as follows:

The 20th century suburbs of the city consist of residential areas interspersed with employment uses, institutions and social and community uses. There are many opportunities for redevelopment, particularly where non-residential uses rationalise or relocate freeing up infill and brownfield sites for residential and other redevelopment.

3.4 Cork Metropolitan Area Transport Strategy (2020)

- 3.4.1 The Cork Metropolitan Area Transport Strategy 2040 (CMATS) was published in 2020 in response to the policies contained in the NPF which envisage that Cork will become the fastest-growing city region in Ireland with a projected 50% to 60% increase of its population in the period up to 2040. Enhancing the Cork Commuter Rail Network, developing a Light Rail Network in Cork on an east-west axis through the city, further enhancing public bus services, and providing for increased and safe cycling and walking infrastructure are the key focuses of CMATS.

- 3.4.2 The eastern boundary of the subject site comprises a section of a future public transport BusConnects radial route – Frankfield to Fairhill (also referred to as the Airport to City Centre route and Route 9) that has been identified in CMATS as a priority measure of the strategy. Specialists have been appointed by the NTA to carry out route determination and finalise the routes. This process is expected to be completed by early 2022.

3.4.3 CMATS is informed by guidance in the NPF that “*there should generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs*”.

3.4.4 CMATS proposes the enhancement of the provision of park and ride facilities in the Cork Metropolitan Area as a solution to car parking demand in Cork City and aims to maximise public transport patronage. The strategy notes that the Black Ash Park and Ride facility, located in the vicinity of the subject site, currently operates below capacity.

3.4.5 CMATS states that such facilities, including the existing one at Black Ash, will require:

quality local walking and cycling networks to support safe and reliable interchange services and adjoining employment and residential uses.

3.4.6 In addition, the CMATS Cycle Network builds on the strategy and framework previously identified in the Cork Metropolitan Cycle Network Plan (2017). As such, additional cycle links have been proposed in CMATS that align with the proposed public transport networks including BusConnects. Cork Metropolitan Cycle Network plan (2017). These include new primary routes, one of which runs along the eastern boundary of the subject site at Kinsale Road.

3.4.7 Regarding primary cycle routes, CMATS states that:

Primary routes have been designated as such because they experience the highest level of demand. Primary routes are typically direct and provide medium-long radial connections to key destinations across the CMA [Cork Metropolitan Area]. These routes are supplemented by secondary and feeder routes which may provide access to residential catchments.

3.4.8 The strategy goes on to identify 10 specific key primary cycle routes to be improved within the Cork Metropolitan Area, of which Kinsale Road-Cork Airport is one.

3.5 Cork City Development Plan 2015-2021

3.5.1 Under the Cork City Development Plan 2015-2021, the subject site is currently zoned ZO 4 “Residential, Local Services, and Institutional Uses”, with the land use zoning objective being as follows:

To protect and provide for residential uses, local services, institutional uses, and civic uses, having regard to employment policies outlined in Chapter 3.

3.5.2 Regarding residential density, paragraph 16.41 of the current City Development Plan states that within the city, residential density in suburban areas greater than 50 units/ha will be appropriate at locations along bus routes and on larger development sites (>0.5ha) capable of generating and accommodating their own character.

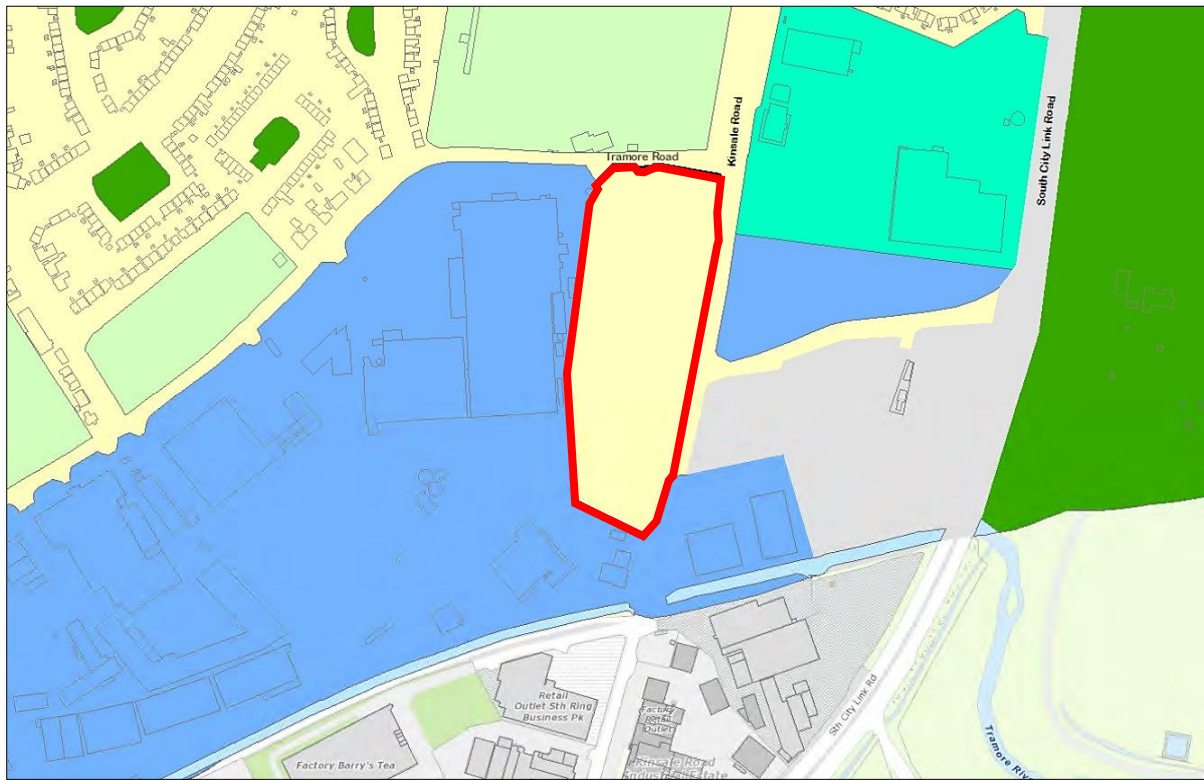


Figure 6. Subject site generally outlined in red. (Source: Proposed Variation No.6 (Tramore Road/Kinsale Road Site) to the Cork City Development Plan 2015-2021, Chief Executive's Report; Annotated by Coakley O'Neill, 2021).

3.5.3 With regard to height, paragraph 16.37 of the current Plan states that *"tall buildings will normally be appropriate where they are accessible to a high quality public transport system which is in operation or proposed and programmed for implementation"*.

3.6 Cork City Draft Development Plan 2022-2028

3.6.1 Under the Cork City Draft Development Plan 2022-2028 the subject lands are zoned ZO 02 "New Residential Neighbourhoods" with the zoning objective being as follows:

To provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.

3.6.2 The subject site is also designated as a Tier 1 site. Section 12.13 of the Draft City Development Plan explains that Tier 1 lands are zoned, serviced lands, the development of which can easily be facilitated within the lifetime of the plan. The subject site is also located just south of an existing Neighbourhood Centre at Tory Top Road and a proposed Neighbourhood Development Site on the site of the former Vita Cortex plant.

3.6.3 Section 10.336 states the following with regard to the Tramore Road/Kinsale Road area:

The mixed industrial / commercial area centred on the Tramore Road and Kinsale Road has regeneration potential with higher density development, linked to the development of high quality public transport.

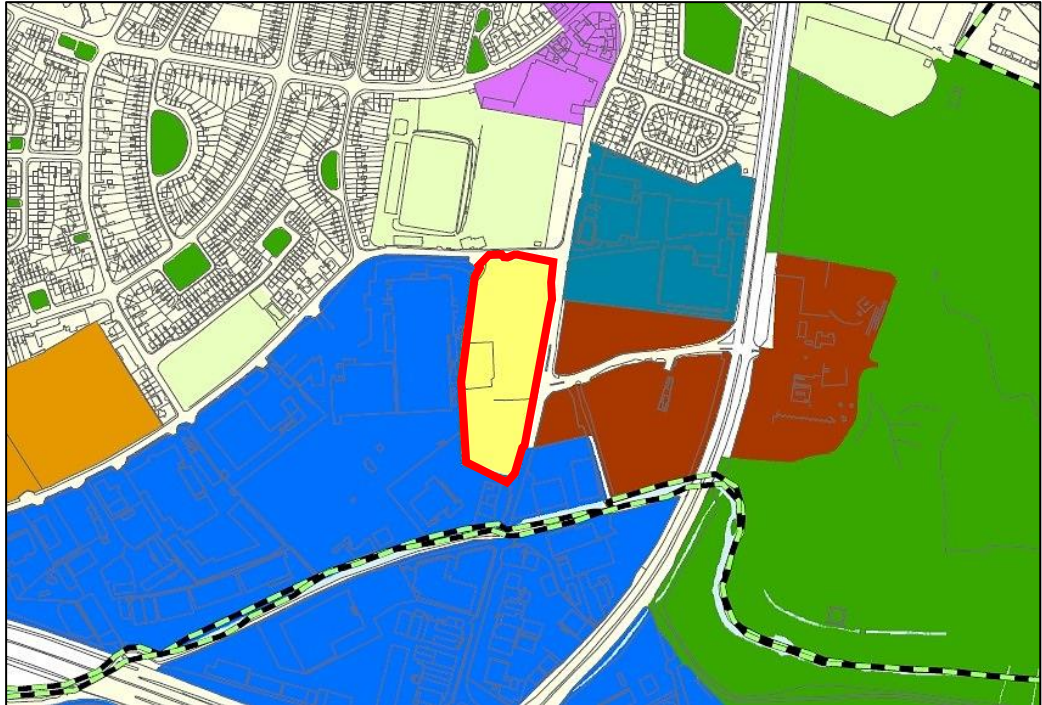


Figure 7. Excerpt from Map 7 of the Cork City Draft Development Plan 2022-2028. Subject site generally outlined in red. (Annotated by Coakley O'Neill Town Planning Ltd., 2021).

3.6.4 Paragraph 11.42 of the draft City Development Plan states the following:

Whilst high density does not imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.

3.6.5 The subject site is located in Inner Urban Suburb 5, "South Link Road Corridor", an area identified for an uplift in existing residential density and building height from the current low intensity uses. According to Table 11.2 of the draft City Development Plan, this area is identified as being suitable for densities of 50-100 units/ha and heights of 3-4 storeys.

3.7 Cork City Urban Density, Building Height and Tall Building Study

3.7.1 Section 4 "Building Heights Analysis" of the *Cork City Urban Density, Building Height and Tall Building Study*, a constituent part of the Draft Cork City Development Plan, sets out a methodological approach designed to determine areas considered to be most suitable for taller buildings, which can be summarised as follows:

- | | |
|---|--|
| 1. Access to services | 2. Proximity to community facilities |
| 3. Proximity to green and blue infrastructure | 4. Identified opportunity areas (including those identified under CMATS) |
| 5. Proximity to railway stations | 6. Proximity to high frequency bus services |
| 7. Proximity to "normal" bus services | 8. Proximity to the planned Light Rail Transit (LRT) |

3.7.2 In acknowledging that a tension exists between physical characteristics and policy framework, Section 3 of the study states that the building height and density strategy prepared for Cork City has been developed and arrived at:

in the knowledge that some informed judgements will also need to be made to reflect on local circumstances when considering suitability for different forms of development and proposed densities on a case by case basis.

3.7.3 Section 7 "Density Done Well" of the study also clearly states that densities of between 52-274 units/ha are appropriate in Inner Urban Suburb locations.

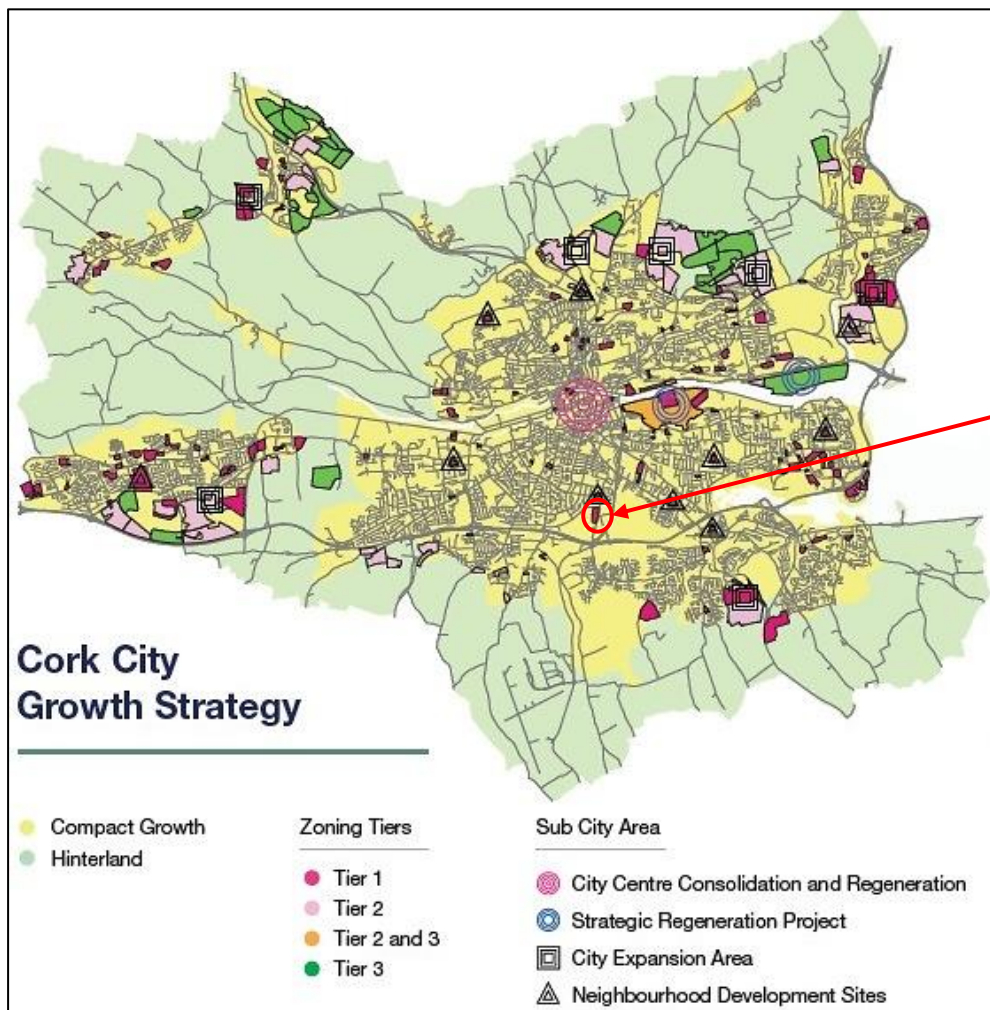


Figure 8. Growth Strategy Map 2022-2028 with location of subject site indicated in red. (Source: Cork City Draft Development Plan 2022-2029; Annotated by Coakley O'Neill Town Planning Ltd., 2021).

3.8 Urban Development and Building Height Guidelines (2018)

3.8.1 These Guidelines are premised on there being “a presumption in favour of buildings of increased height in our town /city cores and in other urban locations with good public transport accessibility” (para 3.1). The Guidelines also require that local planning authorities identify in their development plans “areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development” (SPPR 1) to secure NPF and RSES objectives.

3.8.2 They also require local planning authorities in their plans to be “more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights, while also being mindful of the quality of development and balancing amenity and environmental considerations.”

3.8.3 With regard to the preparation of development plans, paragraph 2.11 states the following:

Locations with the potential for comprehensive urban development or redevelopment (e.g. brownfield former industrial districts, dockland locations, low density urban shopping centres etc) should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct. Such areas, particularly those in excess of 2 ha (approx. 5 acres) in area, should be accompanied by appropriate master-planning exercises and local planning frameworks to deal with movement, public realm, design and other issues that are best addressed at a neighbourhood level rather than at an individual site scale.

3.8.4 SPPR 1 of the Guidelines is explicit that, in their development plans, planning authorities “shall not provide for blanket numerical limitations on building height”.

3.9 Summary

3.9.1 This submission is framed in the context of the above national, regional and local planning policies, the key aspects of which are:

- Ambitious population growth targets for Cork City are in place, which require the delivery of residential development at a heretofore unprecedented scale;
- The required new homes and neighbourhoods must be developed in accordance with the principle of compact growth and be in close proximity to public and active modes of transport so that they are sustainable;
- Compact growth on urban brownfield sites is fully supported, which involves higher density developments and necessitates taller buildings in suitably appropriate locations;
- Such locations include larger sites in excess of 2ha that are accessible to high frequency public transport;
- The assessment of the redevelopment of such sites should be done on a case-by-case basis;
- The regeneration of the Ballyphehane area is a priority.

4.0 PLANNING HISTORY

- 4.1 The site has been subject to several planning applications in the past, which are summarised below.
- 4.2 **Application Register Reference ABP-311166-21:** The majority of the site is currently subject to a pre-application consultation for a proposed strategic housing development of 706no. residential units, a childcare facility and associated site works.
- 4.3 **Application Register Reference 17/37528:** Permission was applied for on the 11th of August 2017 in respect of a retail warehousing/retail showrooms/medical services development. The application was subsequently withdrawn on the 5th of October 2017.
- 4.4 **Application Register Reference 06/30717:** Permission was granted on the 22nd of September 2006 for the demolition and removal of existing buildings, the diversion of the municipal sewer around the site, and the carrying out of ground remediation works.
- 4.5 **Application Register Reference PL28.206292 (03/27881):** Outline permission was granted on the 30th of August 2004, after a first party appeal, for a 4-storey office building with a total floorspace area of 5000m² and associated car park on the southern 1.55Ha portion of the site.

5.0 SUBMISSION

- 5.1 Our clients very much welcome the publication of the draft Plan and the draft zoning of the subject site as a New Residential Neighbourhood.
- 5.2 However, our clients submit that the Density and Building Heights Strategy contained in the Draft City Development Plan conflicts with the requirements stipulated in the *Urban Development and Building Height Guidelines (2018)* as well as with the content of the *Cork City Urban Density, Building Height and Tall Building Study*, which forms a constituent part of the draft Plan. Our clients further submit that the Density and Building Heights Strategy in the draft Plan thus fails to support the strategic objectives of national, regional and local policy regarding compact liveable growth and the achievement of the population growth targets set for Cork City.
- 5.3 As a large brownfield site in an advantageous location in terms of local, regional, national and international connectivity, the subject site is capable of generating its own character as a new high profile, high quality, predominantly residential neighbourhood hub at a key entrance to Cork City within walking distance of high-quality public amenities, facilities and services, and within easy access of Cork City Centre.
- 5.4 In line with the Cork City Urban Density, Building Height and Tall Building Study and the Urban Development and Building Height Guidelines state, this site thus clearly satisfies the criteria for it to be assessed on its own unique merits in terms of its suitability for increased height and density, bearing in mind that an upper density of 274 units/ha is suitable on some sites in Inner Urban Suburbs and that blanket limitations on building height are not permitted.

- 5.5 The subject site is located within Togher/Mahon/Ballyphehane, 1 of the 4 areas of Cork City identified by Cork City Council as being disadvantaged and requiring intervention through the Revitalising Areas through Planning, Investment and Development (RAPID) initiative. As such and as outlined above in section 3 of this submission, the principle of regeneration schemes that deliver improved placemaking in this area is supported at a local level as well as in the context of regional and national policy.
- 5.6 In its current condition, the subject site is an underutilised inner urban suburban brownfield site in a transitional area between established residential neighbourhoods and light industrial and retail warehouse land uses.
- 5.7 The opportunity it presents to entirely reinvigorate and bring back into use a large, single-ownership, vacant, underutilised brownfield site within the existing footprint of Cork City in order to deliver a transformative, mixed-use, primarily residential development at a key entrance to Cork City is significant and has the potential to stimulate the regeneration of the surrounding area, as well as support the case for investment in the short-term in the BusConnects core radial bus network, in accordance with CMATS, as well as in general public realm improvements in the surrounding area in terms of cycling and pedestrian infrastructure.
- 5.8 Accordingly, a proposal for a strategic housing development on the subject site consisting of 706no. units (across 9no. blocks ranging in height from 3-7/8 storeys, with a landmark building of 15 storeys, and with a density of 240 units/ha) together with a creche, gym, community facilities, coffee kiosk, shop, restaurant, landscaped public plaza, garden courtyards and meadow, as well as upgrades to the public realm, is being advanced. Preparations for a separate application for a Primary Care Centre on site are also being finalised. Both will result in the creation of a truly mixed-use, high-quality, accessible and compact new residential neighbourhood on site.



Figure 9. Artist's impression of proposals for the subject site.

- 5.9 As such, the proposals for redevelopment of this site espouse the principles of the Cork City Urban Density, Building Height and Tall Building Study which has informed the preparation of the draft Plan, being a site that:
- Has access to services
 - Is proximate to well-established and extensive community facilities
 - Is proximate to green infrastructure and includes proposals to upgrade existing connections
 - Is located in an identified opportunity area
 - Is proximate to the Black Ash Park and Ride high frequency bus service, as well as existing City services, and is located on a route identified for investment as part of BusConnects
- 5.10 It is therefore a site where a location-specific case for a higher density of development can be considered.
- 5.11 In this context, we note paragraph 16.41 of the current City Development Plan, which states that within the city, residential density in suburban areas greater than 50 units/ha will be appropriate at locations along bus routes and on larger development sites (>0.5ha) capable of generating and accommodating their own character.
- 5.12 We also note paragraph 16.37 of the current Plan, which states that “*tall buildings will normally be appropriate where they are accessible to a high quality public transport system which is in operation or proposed and programmed for implementation*”.
- 5.13 We note proposed paragraph 11.42 of the draft Plan states the following:
- Whilst high density does not imply high rise, tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities.*
- 5.14 However, it is our view that both the spirit and specificity of paragraphs 16.37 and 16.41 of the current Cork City Development Plan have not been carried forward into the draft Plan. We submit that this is a retrograde move and will result in a weaker policy framework to support the compact regeneration and expansion of Cork City, and the ability to respond to potentially significant regeneration opportunities that align with national and regional planning policy as they arise.
- 5.15 While the essence of proposed paragraph 11.42 of the draft Plan is appropriate, we respectfully submit that good planning policy is defined as much by its ability to respond to opportunities that present themselves as much as by its ability to stipulate specific criteria for guiding development.
- 5.16 In this regard and with regard to the contents of the Cork City Urban Density, Building Height and Tall Building Study that has informed the draft Plan, and to the provisions of the Urban Development and Building Height Guidelines, we submit that proposed paragraph 11.42 and the Density and Building Heights Strategy generally require a greater degree of flexibility than they currently contain, since the

preparation of any development plan cannot forecast all sites that may present themselves for development in the future.

5.17 Therefore, we submit that the wording of paragraphs 16.37 and 16.41 of the current City Development Plan, or similar, be inserted into the new Cork City Development Plan to facilitate the efficient and appropriate redevelopment and regeneration of larger opportunity sites, including the subject site, that may arise over the lifetime of the draft Plan, and that will make a significant contribution to the implementation of national and regional planning policies in Cork City.

5.18 Therefore, the purpose of this submission is to request that Cork City Council consider a revision of the Density and Building Heights Strategy to allow for a greater degree of flexibility regarding the redevelopment of larger sites in the new Cork City Development Plan. Specifically, Cork City Council is requested to add the following new objectives to Chapter 11 Placemaking and Managing Development

After the sub-section on Tall Buildings

Tall buildings will normally be appropriate where they are accessible to a high quality public transport system which is in operation or proposed and programmed for implementation.

After the sub-section on Residential Density

Within the city, residential density in suburban areas greater than 50 units/ha will be appropriate at locations along bus routes and on larger development sites (>0.5ha) capable of generating and accommodating their own character.

6.0 CONCLUSION

- 6.1 This submission relates to the site of the former CMP Dairy site known as Creamfields on the Tramore Road and Kinsale Road, which is zoned as a “New Residential Neighbourhood”, and for which target heights of 3-4 storeys and residential densities of 50-100 units/ha are set out in the Draft City Development Plan.
- 6.2 Our clients very much welcome the publication of the Draft Cork City Development Plan and fully support the draft residential zoning of the subject site.
- 6.3 However, our clients are concerned that the target heights and densities for the site itself are overly prescriptive and inappropriate given the site’s size, context and characteristics, and will undermine its redevelopment and the regeneration of the surrounding area. In addition, and more broadly, the Density and Building Heights Strategy in the draft Plan also thus has the potential to impede the redevelopment of other sites across the city and, therefore, hinder the effective compact growth of Cork City over the lifetime of the new City Development Plan.
- 6.4 Therefore, the purpose of this submission is to request that Cork City Council consider a revision of the Density and Building Heights Strategy to allow for a greater degree of flexibility regarding the redevelopment of larger sites in the new Cork City Development Plan. Specifically, Cork City Council is requested to add the following new objectives to Chapter 11 Placemaking and Managing Development

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After the sub-section on Residential Density

Within the city, residential density in suburban areas greater than 50 units/ha will be appropriate at locations along bus routes and on larger development sites (>0.5ha) capable of generating and accommodating their own character.

- 6.5 Please refer all correspondence to Naomi Dowds, Coakley O’Neill Town Planning Ltd, NSC Campus, Mahon, Cork.