

CUNNANE STRATTON REYNOLDS

***Submission to Draft Cork City Development Plan 2022-2028
In respect of Lands at Donovan's Farm, Burkes Hill, Tivoli, Cork***

**On behalf of
The Donovan Family**

by

Cunnane Stratton Reynolds


October 2021
No. 21366

Table of Contents

1.0	Introduction	3
2.0	Executive Summary	3
3.0	Site Location and Development Context	4
4.0	Relevant Planning Policy Context	7
5.0	Draft Cork City Development Plan 2022-2028	13
6.0	Rationale for Rezoning	14
7.0	Conclusion	18

Document Control Sheet

Date	Issue	By	Type
09/21	A	EE	Initial Draft
10/21	B	OOC	Revs
10/21	C	EMP	Revs
10/21	D	EMP	Final
10/21	E	EMP	Submission

Issued	Signed
04/10/21	

All maps reproduced under OSI Licence Number: AR0097621

1.0 Introduction

This submission to the Draft Cork City Development Plan 2022-2028 has been prepared by Cunnane Stratton Reynolds Ltd in accordance with Section 12(2)(b) of the Planning and Development Act 2000, as amended.

This submission is made on behalf of our client, the Donovan Family, in respect of lands at Donovan's Farm, Burkes Hill, Tivoli to the Northeast of Cork City Centre that are now entirely within the Cork City administrative area following the expansion of the Cork City Boundary in 2019.

2.0 Executive Summary

This submission relates to lands at Donovan's Farm, Burkes Hill, Tivoli, Cork City. These lands were previously split between the Cork City and Cork County administrative areas when the Northern portion of the site was within the County.

Although the lands are now fully within the City area, the policies and objectives of both Cork City and Cork County Development Plans are still relevant.

The northern part of the site is currently within the Greenbelt zoning while the Southern part of the site is largely within the Residential, Local Services and Institutional Uses zoning. The Southern part of the site has Lota Beg Estate as its boundary and is also partly within a Landscape Preservation Zone and designated High Value Landscape.

The Draft Cork City Development Plan 2022-2028 proposed to include the majority of the relevant lands within the City Hinterland with the retention of the Landscape Preservation Zone to the Southwest of the site.

The effect of the hinterland zoning in the emerging plan is to sterilise that part of the site for future development.

Our client is vehemently opposed to the proposed inclusion of the lands within the City Hinterland whereby future development would be severely restricted.

It is requested that those lands comprising the Northern farmlands being proposed as hinterland within the Draft Development Plan are instead included within either **Zoning ZO1 Sustainable Residential Neighbourhoods** or **ZO2 New Residential Neighbourhoods** and that the remaining 7.4 acres to the south be retained as residential.

It is respectfully requested that Cork City Council give serious consideration to the inclusion of these lands within a residential zoning for the following reasons:

- **There is an acute need for residential development within the city area.**
- **These lands are serviced, have access and are sequential in the development of the city boundary in line with the regeneration of Tivoli and planned infrastructure investment.**
- **The residential zoning of the lands would be appropriate against the considerations set out in the National Development Plan Guidelines that are relevant to proper planning and sustainable development.**
- **Cork City Council must prioritise the development of lands such as the subject site that are serviceable, accessible, and deliverable within the short term in the emerging Cork City Development Plan 2022-2028.**

3.0 Site Location and Development Context

The land the subject of this development plan submission is outlined in white in Figure 1.

The site comprises lands covering a total area of circa 8.6 hectares. Our client's ownership is shaded in red within Figure 1 below with the area the subject of this request for the restoration of zoning shaded in purple.

The subject site lies to the North of Lota Beg House, which forms a different landholding.

Lota Beg House is a Protected Structure (RPS ref no. PS626). It is listed on the National Inventory of Architectural Heritage (NIAH) and it is a recorded monument. The zoning requested for Donovan's Farm will not in any way affect either the Protected Structure that is Lota Beg House nor its curtilage nor setting.

The site is currently in agricultural use, however, it is serviced by the Cork Main Drainage Scheme which was brought to the site in order to facilitate future development. The site is accessed from Burke's Hill to the east. There are three main access options available to the site: from 1) Ashmount Court to the west which has an existing access road of 7.2 meters in width which extends right to the boundary of Lot 3; 2) from the lands to the south; and 3) the from the north/east of the site via Boherboy Road/Burke's Hill.

The subject site is located contiguous to the existing communities and infrastructure at Ashmount and Mayfield. Locally there are schools, sports and leisure facilities and retail all available as part of the infrastructure, within Mayfield.

The area surrounding the site is predominantly residential with a number of established housing estates to the West/ Northwest of the site. Mayfield GAA Club is located in close proximity to the north of Lot 3. The site is located close to but not within Tivoli ridge which has been substantially developed as indicated by the Development Plan extract at Figure 3. There has been further development within the ridge area over the last number of years.

Prior to the future development of any transport proposed in CMATs, the site has access to the bus terminus at Ashmount for the No. 208 to Bishopstown.

The site is serviced by Water, Foul and other infrastructure.

The site is a 10-minute bicycle journey from the City Centre and some 20 minutes walking time from the Northern end of Patricks Street. The site is served by the 3 no. bus routes.

Figure 1 The Site



2 Google Earth Image showing Site Development Context

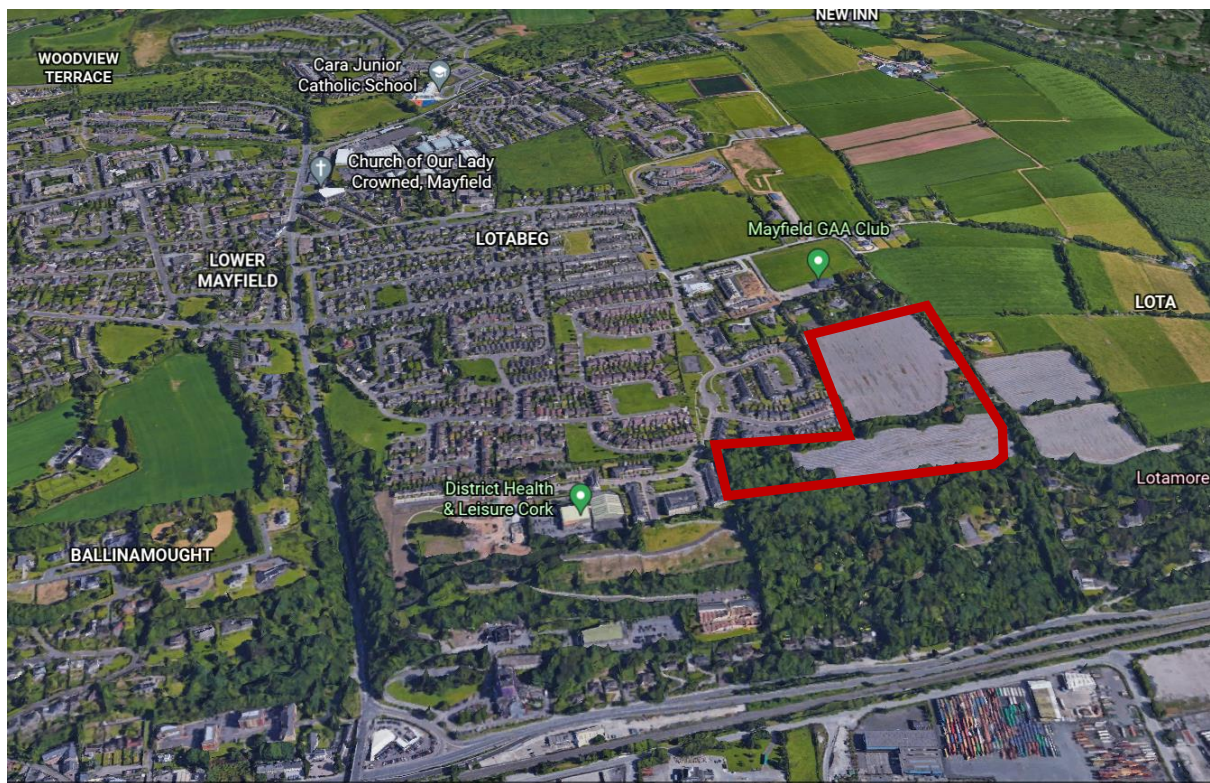
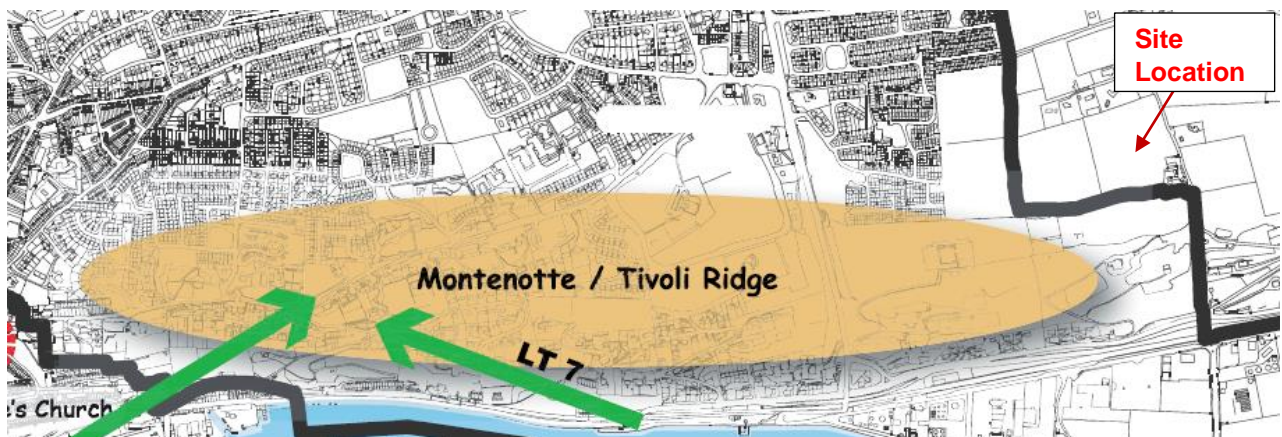


Figure 3 Extract from Cork City Development Plan 2015 showing Tivoli Ridge



3.1 Relevant Planning History Context

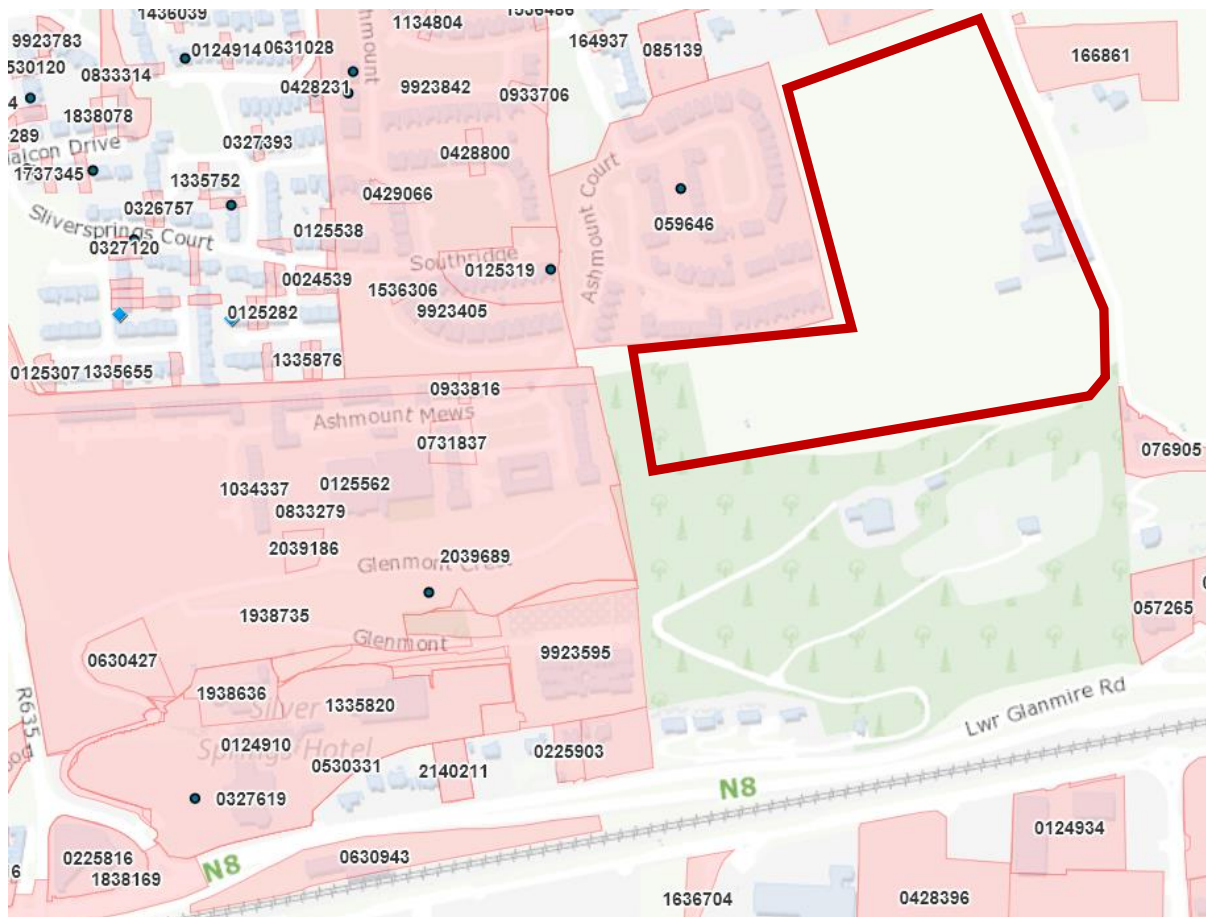
There is no recent planning history associated with the relevant lands. There have been a number of recent relevant planning permissions in close proximity to the subject site however

which confirms the suitability of this location for residential development. Details for relevant planning permissions are set out below:

Under Cork City Council ref. 19/38735 permission was granted for 19 no. dwelling houses and 14 no. apartments and all ancillary site development works.

Cork City Council ref. 20/39689 permitted the construction of a residential development consisting of 22 no. dwelling houses and all ancillary site works.

Figure 4 Extract from Cork City Council Online Planning Portal Map



4.0 Relevant Planning Policy Context

National Planning Policy and Guidance

National Planning Framework (NPF) 2018

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

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

- NPO 2a – A target of 50% of future population and employment growth will be focused in the existing five cities and their suburbs
- NPO 3a – Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- NPO 3b – Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints
- NPO 4 – Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- NPO 33 – Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

The National Planning Framework (NPF) sets significant targets for Cork and suburban area with a population growth of 105,000 – 125,000 and a minimum population of 314,000 by 2040 which equate to a 50% population growth also by 2040. As the site is strategically located in close proximity to the City Centre, is contiguous to existing development, along with the NPF targets for Cork to increase densities, the site can be reasonably viewed as a sustainable development location and one where the rezoning to residential should occur and where it is sequentially preferred in planning terms.

Figure 5 Targeted Pattern of City Population Growth (Table 4.1 of the NPF)

City	Population 2016	Population Growth to 2040 ²⁷		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

Objective 3B of the NPF states that 50% of all new homes required from the population growth expected in cities, including Cork, are to be accommodated within built up areas with what can be assumed to be the remaining 50% accommodated in expanding areas within the City Council area:

“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints”.

The requirement to accommodate housing need and population projections will require compact growth, significant investment in infrastructure and the achievement of increased densities to sustain and improve services including public transport.

Our client's site would be defined as a Tier 1 site in the NPF approach to land zoning as land contiguous to existing residential development that is able to connect to existing development services i.e., road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply and for which there is service capacity available and is therefore ready to accommodate new development.

Regional Planning Policy and Guidance

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

Regional Spatial and Economic Strategies provide a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework.

The RSES seeks to attain sustainable compact settlements with the 10-minute city and town concepts, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes. Our client's site is located in and contiguous to the residential suburbs and amenities of Ashmount and Mayfield and would benefit from and support the existing investment in infrastructure in those areas.

The RSES sets a population target of 283,669 for Cork City and suburbs by 2031. In accordance with the objectives of the NPF, to promote the consolidation of Cork City and suburbs, a target of a minimum of 50% of all new homes should be within the built-up footprint in Cork and 30% in other metropolitan settlements.

In supporting the NPF, the RSES prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. To achieve compact growth, the RSES prioritises housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling. The subject site is directly accessible from existing settlements and the active travel infrastructure related to that.

The RSES contains a Metropolitan Area Strategic Plan (MASP) for Cork. The MASP seeks to:

"Promote the Cork Metropolitan Area as a cohesive metropolitan employment and property market where population and employment growth is integrated with: (i) the city centre as the primary location at the heart of the metropolitan area and region reinforced by; (ii) the continued regeneration, consolidation and infrastructure led growth of the city centre, Cork City Docklands, Tivoli and suburban areas; (iii) active land management initiatives to enable future infrastructure led expansion of the city and suburbs (to be assessed by Core Strategy initiatives); and, (iv) the regeneration, consolidation and infrastructure led growth of metropolitan towns and other strategic employment locations in a sustainable manner".

The subject site is adjacent to the proposed regeneration at Tivoli and would be mutually beneficial to the development of further local infrastructure including transport.

Cork Metropolitan Area Transport Strategy (CMATS) 2020

Cork Metropolitan Area Transportation Study (CMATS) was adopted in 2020 and "represents a coordinated land use and transport strategy for the Cork Metropolitan Area. It sets out a

framework for the planning and delivery of transport infrastructure and services to support the CMA's development in the period up to 2040".

In CMATS, Tivoli is identified for a proposed new station along the Midleton / Cobh – Cork suburban rail to 'support future development at Tivoli docks' as shown in Figure 6 below. The provision of a new station along the suburban rail line should facilitate development not only in the docks but in the wider area, on the way to and from Cobh/Midleton such as our client's lands. In relation to the new stations proposed, CMATS states *'these stations will support primarily residential-led mixed use development covering both brownfield land within Cork City and Metropolitan towns and identified greenfield sites in UEAs.'* It is crucial that sufficient land is zoned (including adequate headroom) for residential development in locations that benefit from ease of access to and proximity to the proposed new rail stations along the Midleton / Cobh – Cork line. This approach is consistent with the NPF and National Development Plan which advocates that transport planning, particularly investment in public transport and land use planning are aligned.

Figure 6 Extract from CMATS



Local Planning Policy

Although the lands are now entirely within the Cork City administrative area, the northern portion of the site was previously located within Cork County Council administrative area. Our client's lands are therefore currently subject to the policies and objectives of the Cork City Development Plan 2015 and the Cork County Development Plan 2014 as set out below.

It was worth pointing out that the boundary extension to the city was initiated to facilitate the sustainable expansion of the city to assist it realise its full potential as an international city of some significance. We believe that this extension anticipated instances such as in this case where sustainable urban extension following the twin concepts of compact urban growth and the adoption of the sequential approach to zoning could be achieved consistent with the proper planning and sustainable development of the area.

Cork City Development Plan 2015

As indicated below the southern portion of our client's lands are located within the boundary of the Cork City Development Plan 2015. The site is largely within the Residential, Local Services and Institutional Uses zoning where Development Plan Objective ZO 4 seeks

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

The provision and protection of residential uses and residential amenity is a central objective of this zoning, which covers much of the land in the suburban area.

It is noted that this part of the site is also within a High Value Landscape where the Development Plan aims

“To conserve and enhance the character and visual amenity of Areas of High Landscape Value (AHLV) through the appropriate management of development, in order to retain the existing characteristics of the landscape, and its primary landscape assets. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape. There will be a presumption against development where it causes significant harm or injury to the intrinsic character of the Area of High Landscape Value and its primary landscape assets, the visual amenity of the landscape; protected views; breaks the existing ridge silhouette; the character and setting of buildings, structures and landmarks; and the ecological and habitat value of the landscape”.

The western part of the site is within a Landscape Preservation Zone – NE14 Lota Ridge for which the following landscape asset categories are listed:

A Topography - ridges, escarpments, slopes

B Water / River Corridors - rivers, estuary, harbour, The Lough, Atlantic Pond, Docklands, Port of Cork

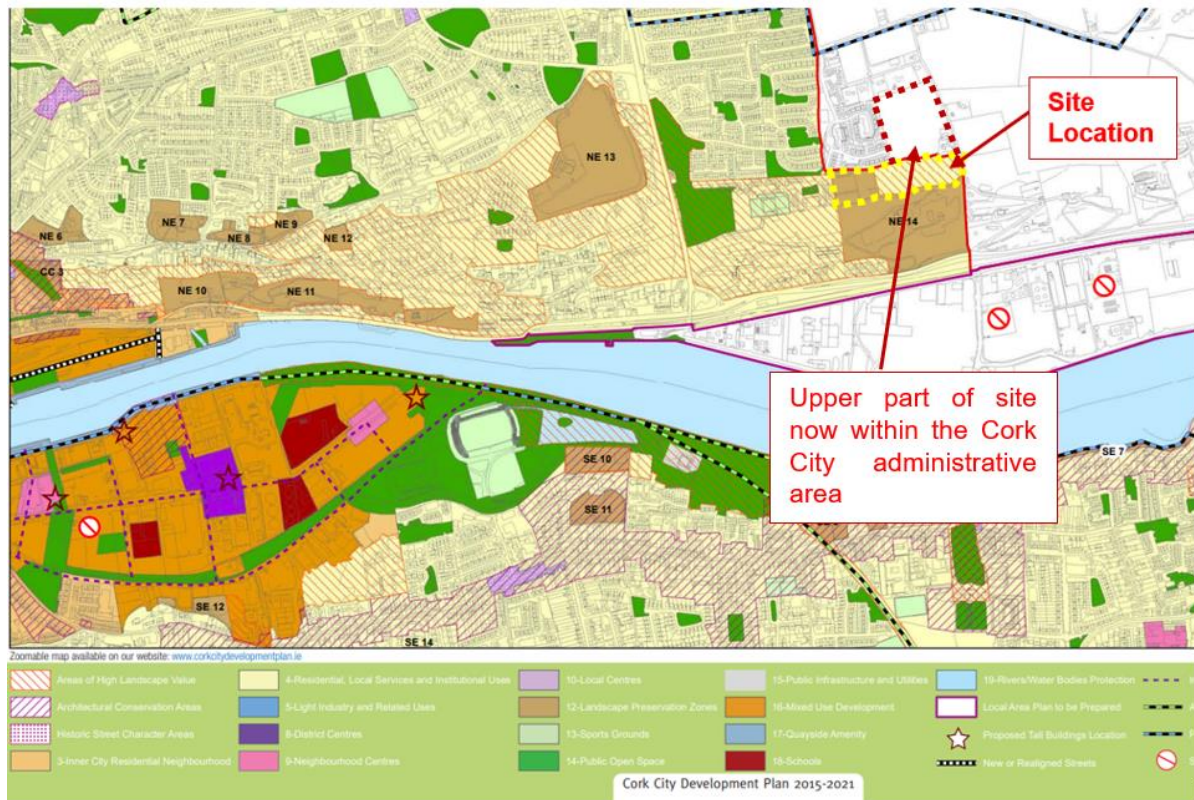
C Tree Canopy - Areas with existing woodlands or significant tree groups, or areas with potential for new woodlands.

E Visually Important Land (including Views and Prospects of Special Amenity Value, Potential Vantage Points and Locally Important Views)

G Landmarks / Natural Features / Cultural Landscape – land forming the setting to existing landmark buildings and/or protected structures / buildings of significance

J Historic Landscapes (including monuments / historic routes).

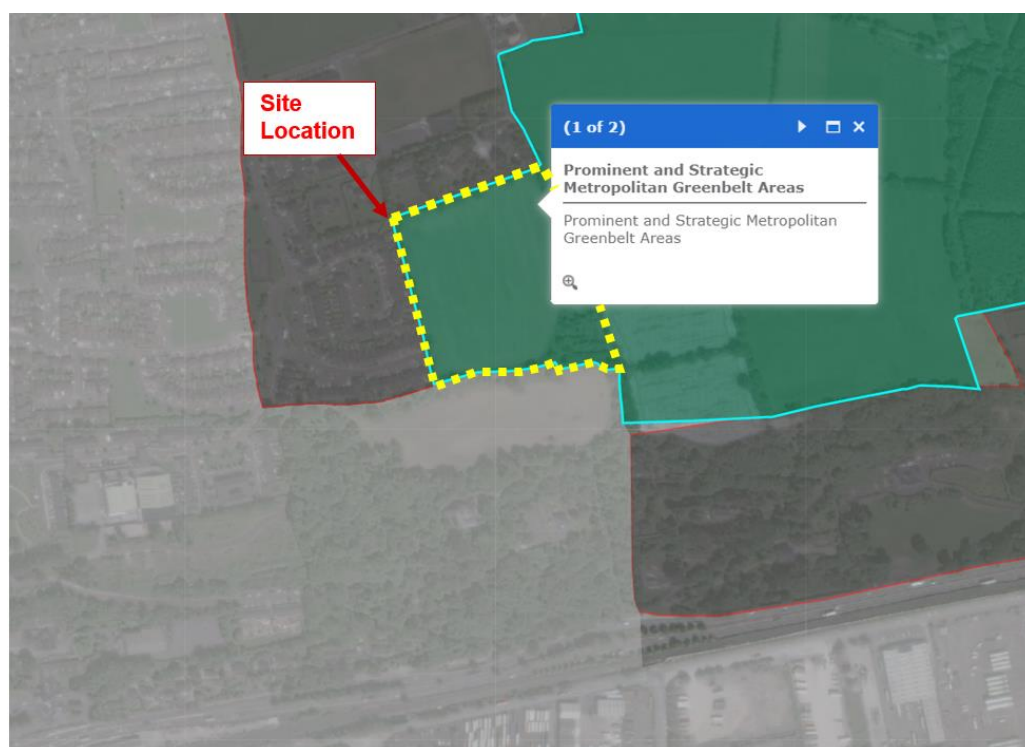
Figure 7 Cork City Development Plan 2015 Map 5 North Eastern Zoning Objectives



Cork County Development Plan 2014

The Northern part of our client's lands are within the Prominent and Strategic Metropolitan Greenbelt as indicated below. These lands are now within the administrative jurisdiction of Cork City Council.

Figure 8 Cork City Development Plan 2015 Map 5 Norther Eastern Zoning Objectives



5.0 Draft Cork City Development Plan 2022-2028

The Draft Cork City Development Plan vision is based on a number of key strategic principles identified in Section 1.5 including:

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

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

Sustainable and active travel - To implement the Cork Metropolitan Area Transport Study (CMATS) and develop a transformed sustainable transport system with a significant shift toward walking, cycling and public transport and to enshrine this principle in all developments across the City.

The '15-minute city' and 'walkable neighbourhoods' underpin the Core Strategy for the development of Cork City offering sustainable building blocks for land use planning, central to delivering compact liveable growth in the City.

The development of the relevant lands at Donovan's Farm can positively contribute towards the achievement of the key strategic principles underpinning the development strategy for Cork City to 2028.

However, the Draft Cork City Plan 2022-2028 proposes to include the majority of the subject lands within the ZO 21 City Hinterland zoning with the Western part retained within a Landscape Preservation Zone.

Zoning Objective 21 of the Draft Development Plan for the City Hinterland seeks “To protect and improve rural amenity and provide for the development of agriculture”.

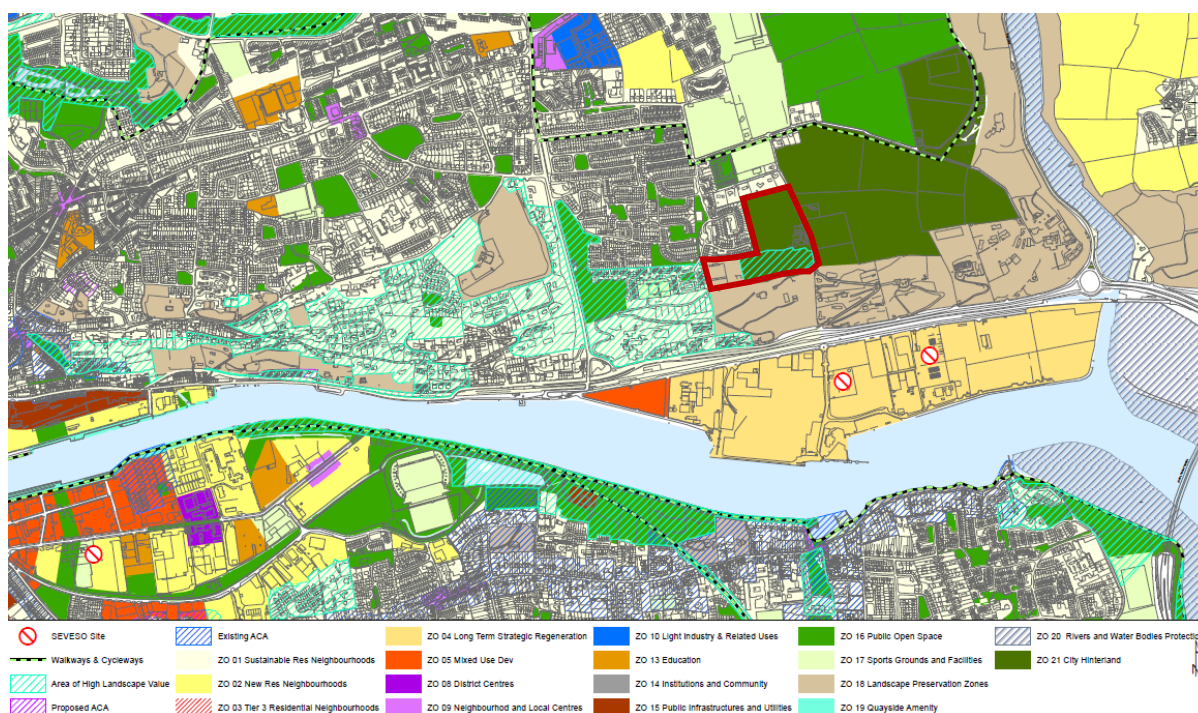
The primary objective of this zoning is to preserve the character of the City Hinterland generally for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity. Rural-related business activities which have a demonstrated need for a rural location are also permissible. Any development associated with such uses should not compromise the specific function and character of the City Hinterland in the particular area.

It is stated that housing must be based on exceptional rural housing need and on the core considerations of demonstrable economic or social need to live in a rural area within the City Hinterland.

The role of the Hinterland in the emerging Cork City Core Strategy is set out as follows:

“Additional development needs to be examined in the context of the local and environmental characteristics of the area. Balance any future development with the wider needs of Cork City to achieve compact growth and more sustainable transport patterns. Ensure environ-mental preservation and the retention and enhancement of urban and rural character. Cork Airport will be supported in its role as an international gateway for the City, wider Metropolitan Area and Southern Region from a transport, connectivity and economic viewpoint”.

Figure 9 Draft Cork City Development Plan Zoning Map 05



6.0 Rationale for Rezoning

The purpose of this submission is to request that Cork City Council reinstate the residential zoning of the southern portion of the site and zone the northern part of the site for residential development. It is submitted that the site would be appropriately included within either **Zoning**

ZO1 Sustainable Residential Neighbourhoods or ZO2 New Residential Neighbourhoods.

The lands at Donovan's Farm are available and deliverable in the short term. They provide an opportunity to create a residential community that prioritises walking, cycling and public transport and reduces car dependency, as well as sustaining and supporting local infrastructure improvements.

6.1 Suitability of Lands for Residential Development

The suitability of the lands at Donovan's Farm for zoning have been considered against the current National Development Plan Guidelines which state that the following should be assessed when determining the suitability of land for development: Need; Policy Context; Capacity of Water, Drainage and Roads Infrastructure; Supporting Infrastructure and Facilities; Physical Suitability; Sequential Approach; Environmental and Heritage Policy, including Conservation of Habitats and other Sensitive Areas.

The Draft Cork Joint Housing Strategy and Housing Need Demand Assessment estimates that the total housing demand over the plan period is 17,118 households or 2,853 households per annum. It is indicated within the Draft Housing Strategy and Volume 1 of the Draft Plan that the north-east Suburbs in which the relevant lands are situated will play a major role in accommodating this housing growth in Cork City. The Northeast suburbs will account for 17.6% of the population growth for Cork City to 2028, making it the area allocated the second highest level of population growth in the City Council area after Ballincollig. There is a demonstrable need for additional housing in this area to accommodate the high level of growth anticipated.

As set out above, the overarching objectives of the NPF and RSES are to promote compact growth within and contiguous to existing urban footprints, such as the lands at Donovan's Farm where development can facilitate easy access to necessary services and facilities on foot, by bicycle and using public transport. Future zoning within the Cork City area must prioritise areas which consolidate existing established development. The relevant lands at Donovan's Farm are contiguous to existing development with large residential estates to the west including Ashmount Court. There are houses to the north and east of the site also with Lota Beg House to the South. The development of the lands could be considered infilling. The residential zoning of this land is consistent with the policies and objectives of the NPF and RSES.

Para 2.55 of the emerging Plan sets out the City Council's application of the requirement for compact growth in line with national and regional planning policy and guidance. The draft plan states in para 2.55 that:

'National Planning Objective 3(b) of the NPF requires at least half (50%) of all new homes targeted in each of Ireland's 5 cities to be delivered within their existing built-up footprint. Appendix 4 of the NPF sets out a definition of "existing built-up footprint" based on a CSO definition. When applied to Cork City this definition is too broad, as it covers the majority of lands within the City boundary. To address this, an assessment of the location and nature of all sites in the Core Strategy has been carried out. This determined whether these sites are within the existing built-up footprint or are greenfield in nature. Sites largely surrounded by existing development are considered to be within the city's existing built-up footprint. This includes infill and brownfield sites and sites contiguous to the existing city or urban town. Lands that are largely separate from the existing built-up footprint are considered greenfield in nature. Table 2.5 and Figure 2.20 show how 65% of the Tier 1 and Tier 2 lands set out in the core strategy are

located within the existing built-up footprint of the City. This reflects the Core Strategy's objectives and targets to deliver compact growth in line with the NPF.'

The subject site clearly meets the definition of existing built up footprint as the subject site is largely surrounded by existing development and is certainly contiguous to existing development and the development of which would constitute compact urban growth especially when considering the availability of existing and proposed services consistent with the concept of the 15 minute city. This is shown conclusively in our opinion in Figure 10 below.

Figure 10 Subject Lands Contiguous to Existing Built Up Urban Area



The subject site has received previous infrastructure investment in the form of the Cork Main Drainage Scheme and the access has been considered in the design and permission for Ashmount Court through which a future access to the lands could be facilitated.

The lands are within are highly accessible to supporting infrastructure and facilities within the city centre and at Mayfield and Ballyvolane Neighbourhood and district centres. The following infrastructure and facilities are within approximately 1.5km of the site:

- The Mayfield Neighbourhood Centre which includes an Aldi and MACE;
- Mayfield Industrial Estate;
- First Steps Creche;
- Scoil Mhuire agus Eoin;
- Church of our Lady;
- Mayfield GAA Club;
- Mayfield United;
- District Health and Leisure Club

- A number of public open spaces
- Substantial proposed open spaces and an amenity to the north east of the site
- A number of bus stops serving the following urban bus routes:
 - 201: CUH - CIT - Wilton Road - Hollyhill - Farranree - Blackpool -Ballyvolane - Lotabeg
 - 208: Ashmount to Curraheen Road
 - 209: St. Patrick St - Audley Place - Montelotte - Lotamore

The proposed development of our client's site would make efficient use of existing infrastructure as the site is readily accessible via existing accesses (with potential access through existing development to the west) and can connect directly to services that have been put in place and therefore rezoning in this instance would be consistent with the concepts of both compact urban growth and the sequential approach to zoning.

In terms of physical suitability, there are no known constraints. The site is partially zoned for residential development in the current City Development Plan and is therefore deemed to be a suitable location for new homes within the city.

The site is much closer and more accessible to the city centre than other lands that have been zoned for residential development including lands proposed for residential development further North.

To fully realise the vision for Cork City, sequential development opportunities of sites closest to the city centre must be maximised. This approach would be consistent with the NPF and National Development Plan Guidelines which recognises that *"development sprawl at every settlement level in Ireland has manifested as scattered development, 'leapfrogging' continuous suburbs and linear patterns of strip or ribbon development"*.

As noted, the lower portion of the site is partly included within a Landscape Preservation Zone with reference to the following landscape assets:

A Topography - ridges, escarpments, slopes

B Water / River Corridors - rivers, estuary, harbour, The Lough, Atlantic Pond, Docklands, Port of Cork

C Tree Canopy - Areas with existing woodlands or significant tree groups, or areas with potential for new woodlands.

E Visually Important Land (including Views and Prospects of Special Amenity Value, Potential Vantage Points and Locally Important Views)

G Landmarks / Natural Features / Cultural Landscape – land forming the setting to existing landmark buildings and/or protected structures / buildings of significance

J Historic Landscapes (including monuments / historic routes).

We would question the inclusion of the part of our client's site within the Lota Ridge Landscape Preservation Zone.

The site does not form part of a defined ridge as per the Cork City Development Plan 2015 mapping. As indicated above, the site is outside the Montenotte/ Tivoli Ridge. Notwithstanding this, the geographical location of land within the defined ridge area has not precluded the

development of sites further west of our client's lands. We would further point out that the existence of trees on site should not in itself justify inclusion within a Landscape Preservation Zone. Landscapes can be worthy of protection for many reasons and can be inclusive of the built form.

The land does not include any river or water body.

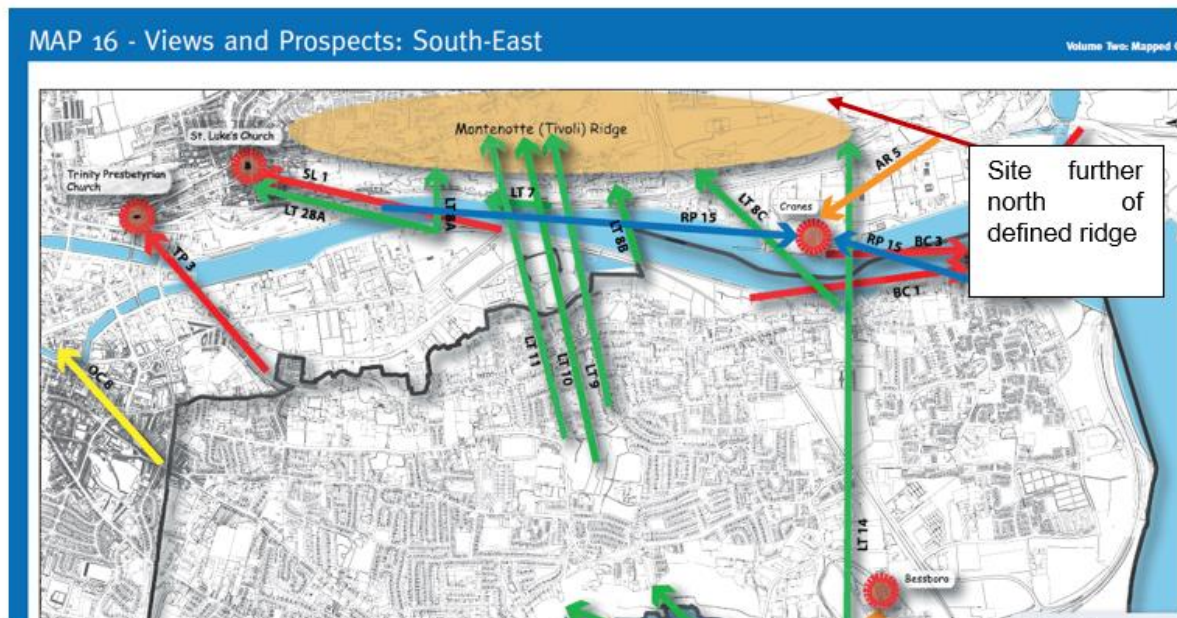
There are no Protected Views or Prospects through or to the relevant lands. As indicated below, protected views towards the ridge or generally further west of our client's lands.

Lota Beg House is a Protected Structure, listed on the NIAH and a recorded monument. Our client's lands are further north of Lota Beg House. The presence of a protected structure close to a site is not sufficient reason to preclude its development and the fact that the lower portion of our client's site, closest to Lota Beg House is currently zoned for residential development confirms this.

If Cork City Council are minded to maintain the part of our client's lands with the Landscape Preservation Zone, we believe that the remainder of the site could be sensitively developed with a high quality residential development that would respect the presence of Lota Beg House to the South and utilising trees that currently exist on site and positively making a feature of these.

This submission is accompanied by a Visual Assessment (Appendix A) which includes 4 no. views taken from locations south of the River Lee looking towards the lands at Lota Beg. This assessment shows the substantial tree cover that is located within the site area and within which development can be effectively screened and the landscape and treescape utilised in a positive manner. We believe that our client's lands could be carefully developed to assimilate into the landscape without resulting in any adverse visual impacts.

Figure 11 Map 16 Cork City Development Plan 2015 – Views & Prospects Southeast



6.2 Compliance with National, Regional, and Emerging Planning Policy

As indicated above the proposed rezoning is consistent with national planning policy in the form of Ireland 2040 which comprises the National Planning Framework and National

Development Plan which advocate alignment of infrastructural investment in public transport and transport planning with land use planning. This is significant in respect of the site's proximity to the Cork Cobh/Midleton Rail Line. The requested rezoning is also consistent with the ambitious objectives and population projections set out in regional planning strategy (the RSES for the South).

A full rezoning of our client's site would additionally be consistent with the following objectives contained within the emerging City Plan:

Objective 2.2: National Planning Framework Targets

Cork City Council will align with the National Planning Framework (NPF) to achieve the ambitious growth targets set out for Cork City and Metropolitan Area up to 2040. The Council will apply local planning policy approaches in combination with active land management measures to help achieve these targets.

Objective 2.3: National Development Plan Investment

Cork City Council will actively support the planning, design and delivery of capital investment in the National Development Plan (NDP) and other investment programmes that maximise delivery of infrastructure-led growth, deliver compact liveable growth and climate action to make the city an attractive, diverse and resilient place to live.

Objective 2.4: Cork Metropolitan Area Strategic Plan

To develop Cork City in a manner that strengthens the role of the Cork Metropolitan Area as an international location of scale and a primary driver of economic and population growth in the Southern Region.

Objective 2.5: Regional Investment

To identify and seek investment packages into the Cork Metropolitan Area from European and Government Exchequer funding streams that help deliver population and job targets, prioritise infrastructure led investment and quality of place.

Objective 2.8: The 15-Minute City

To support the delivery of a 15-Minute City delivering Compact Liveable Growth through walkable neighbourhoods, towns and communities with a mix of uses, house types and tenures that foster a diverse, resilient, socially inclusive and responsive city. Strategic

infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City's liveability.

Objective 2.9: Low Carbon City

Support the delivery of a lower carbon, sustainable city where development avoids, mitigates and adapts to the effects of climate change while protecting and enhancing Cork City's environmental assets.

Objective 2.10: Mix of Uses

Support the delivery of a diverse mix of suitable uses that enhance Cork City's network of neighbourhoods, towns and communities as places to live, work, provide, care, learn and enjoy.

Objective 2.11: Design-Led City

Follow a design-led approach that delivers sustainable, high quality placemaking. Development shall contribute positively to the quality of the surrounding built and natural environment and shall be planned and designed with reference to climate change mitigation and adaptation.

Objective 2.12: Walkable Neighbourhoods

New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:

- a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.*
- b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character).*
- c. Ensuring a child friendly and age friendly environment with a mix of household types.*
- d. Designing a safe place that enables access for all.*
- e. Creating a healthy neighbourhood with direct access to high quality parks and public spaces.*
- f. Being well-connected with easy access to public transport and active travel.*
- g. Providing enhanced permeability for walking and cycling.*

Objective 2.24: Implementing the Core Strategy

To implement and support the delivery of the Core Strategy in accordance with the Core Strategy Map and Table, the Growth Strategy Map and Table and the Objectives for City Growth Table set out in this plan.

Objective 2.25: Compact Growth

It is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy.

Objective 2.26: Housing Supply

Support an increase in the supply, affordability and quality of new housing in city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built.

Objective 2.28: Supply of Zoned Land

Monitor and review the Core Strategy to ensure that sufficient zoned land continues to be available to meet the City's housing requirements over the lifetime of the Plan.

Objective 2.30: Managing the Hinterland

Any development proposals in the remainder of the hinterland will be closely managed to protect against unnecessary and unplanned urban sprawl.'

In conclusion on policy, this submission is entirely consistent with national, regional and emerging local planning policy and there are a significant number of emerging policies supportive of the requested rezoning. Zoning would be consistent with principles of compact urban growth, the sequential approach to zoning and the concept of a 15 minute city advocated in the emerging plan.

7.0 Conclusion

The Donovan Family welcome the opportunity to participate in the development plan making process. It is requested that the content of this submission be given careful consideration during the preparation of the Cork City Development Plan 2022.

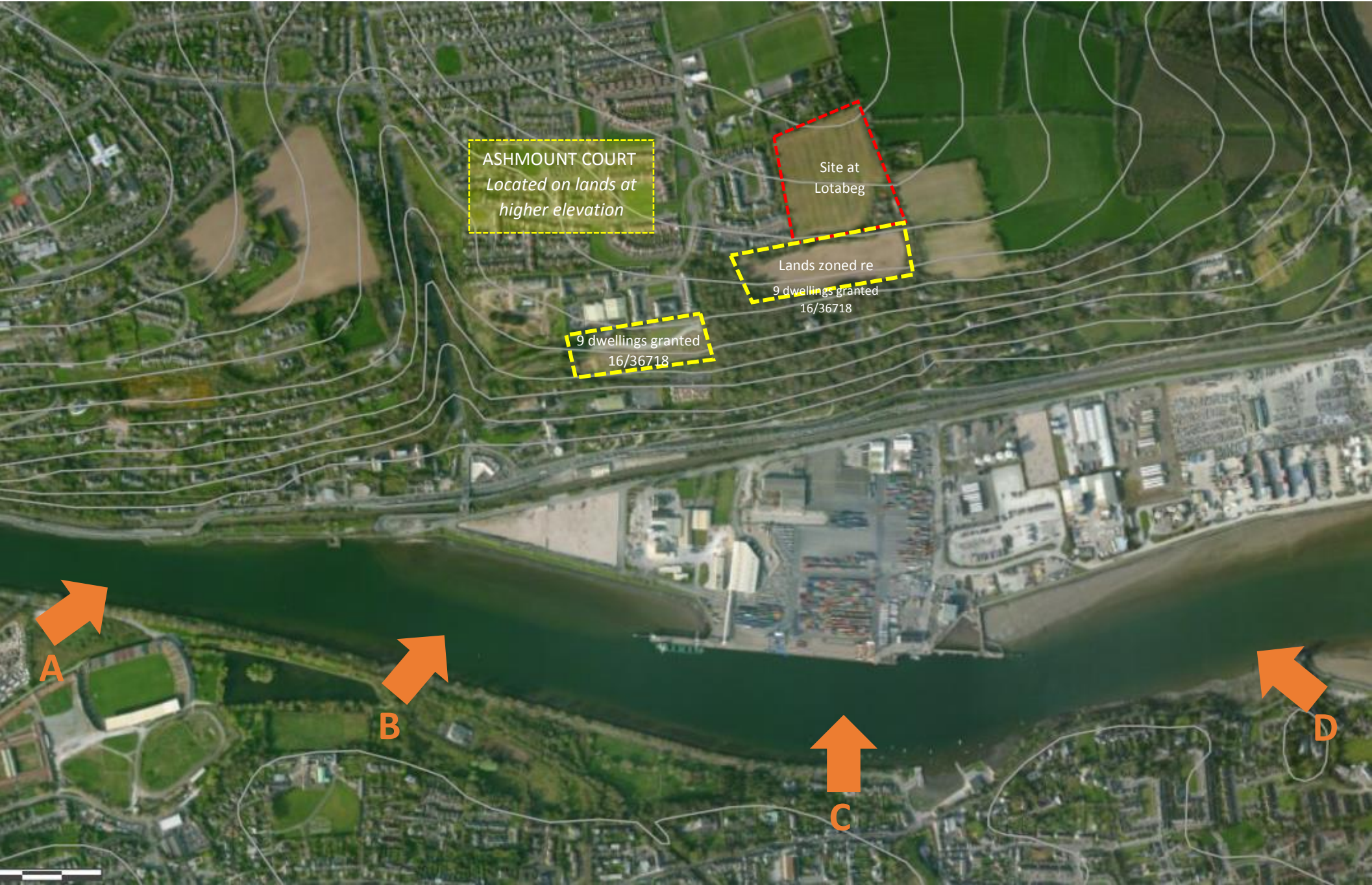
In summary, the submission requests that the existing residential zoning of our client's lands be maintained in the emerging Cork City Development Plan 2022 and that the land to the north of this also be included within a residential zoning.

Our client would welcome the opportunity to discuss any of the above recommendations in further detail with Cork City Council.

If any further information is required, please do not hesitate to contact us.

Appendix A Visual Assessment

LOTA: VISUAL IMPACT ASSESSMENT





VIEW A: SITE COMPLETELY SCREENED BY EXISTING TREES (WINTER VIEW)



VIEW A: SITE COMPLETELY SCREENED BY EXISTING TREES (SUMMER VIEW)



VIEW B: SITE COMPLETELY SCREENED BY EXISTING TREES (WINTER VIEW)



VIEW A: SITE COMPLETELY SCREENED BY EXISTING TREES (SUMMER VIEW)



VIEW C: SITE COMPLETELY SCREENED BY EXISTING TREES



VIEW C: SITE COMPLETELY SCREENED BY EXISTING TREES - 9 dwellings granted under 16/36718 on elevated and exposed site to the west



VIEW D: SITE COMPLETELY SCREENED BY EXISTING TREES