

hw planning

Submission to Draft Cork City Development Plan 2022 - 2028

Extension of ZO 01 Sustainable Residential Neighbourhoods zoning at Fairhill, Cork

Client FCDC Construction Ltd.

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Connecting places.

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01 Introduction

01.1 Submission Purpose

This submission has been prepared on behalf of behalf of FCDC Construction Ltd., in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 -2028 (Draft DP). This submission is specifically in response to the Council's draft zoning objectives for the North-west City Suburban area of Fairhill which will form part of the Cork City Development Plan 2022-2028. In particular it relates to the rezoning of proposed ZO 16 lands to ZO 01 lands (indicated in Figure 01.1), in the interest of the sustainable and balanced development of the area. FCDC Construction Ltd. intends to collaborate with LIONCOR, an Irish residential development company in relation to the development of these lands, building on an established collaborative relationship between the two companies.

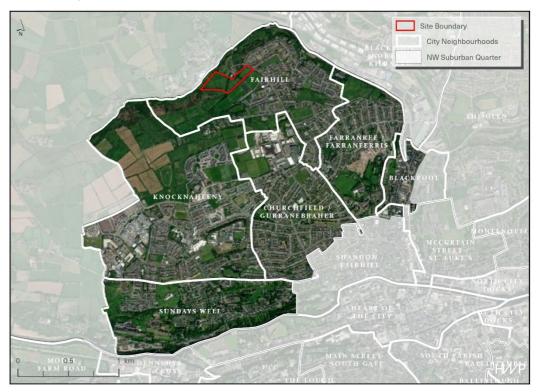


Figure 01.1 .Subject Site in Context of North-west City Suburb

01.2 Submission Context

FCDC Construction Ltd. and LIONCOR welcome the Council's positive plans for the Northwest City Suburb in particular the inclusion of Fairhill and neighbouring Hollyhill within the proposed 7 no. new strategic employment locations and the ambitious plans for a North-West City Park identified in the Draft DP. However, our client considers that the current mix of housing type and tenure in the area does not make appropriate provision for its evolving employment profile leading to a lack of balance, diversity and unsustainable commuting patterns in the area. Coupled with this, the extensive open space zoning inhibits consolidated and compact growth in the area and act as a constraint to

connectivity. In this context our client considers that the 5.8 hectares of lands at Fairhill present an opportunity to address the existing imbalance in the housing mix. In view of the central location of the subject site, immediately adjacent to an existing residential area, they suggest that it would be more appropriately zone ZO 01 Sustainable Residential Neighbourhoods than the ZO16 Public Open Space as proposed in the Draft DP.

01.3 Submission Request

That the Council facilitate and support the availability of an enhanced mix of housing type and tenure in the North-west City Suburb by extending the zoning ZO 01 Sustainable Residential Neighbourhoods to include the 5.8 hectare subject site for private and affordable housing provision.



Figure 01.2 Draft DP Zoning at Fairhill



Figure 01.3 Proposed Zoning at Fairhill

02 Summary of Policy Context

02.1 Regional Spatial and Economic Strategy 2020 (RSES)

The RSES promotes consolidating and intensifying new residential and employment development to render it accessibility by walking and cycling^{1.} The Cork MASP Objective 1b seeks to promote the Metropolitan Area as a cohesive area where population and employment growth are integrated. The RSES espouses the concept of the 'Right Location' which prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. The RSES also supports the concept of sustainable, employment-led growth in settlements in the Cork MASP and wider region³.

02.2 Draft Cork City Development Plan 2021

The Objective for City Growth are set out in Section 2.56 of the Draft DP. It notes the role of City Suburbs in the Core Strategy as:

Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.

Section 7.17 of the Draft DP notes that the spatial distribution of new employment lands has sought to:

positively respond to wider challenges that includes targeting neighbourhoods where there are relatively high levels of unemployment, creating inclusive and sustainable communities and anticipating likely market trends over the period to 2028.

Section 7.17(d) identifies 7 new strategic employment locations, including Fairhill and Hollyhill, which it states have been 'identified owing to the proximity to successful employment facilities or where there is market demand for a location alongside the strategic road network'.

¹RSES RPO 151

² Section 3.9 RSES

³ Section 2.4 of the RSES

The Draft DP is supported by the Strategic Employment Locations Study (SELS) which notes that a number of large employment locations, particularly in the North-west City Suburb and Mahon are situated proximate to areas of high unemployment. Figure 02.1 (based on SELS Figure 3.3.) shows a clear juxtaposition between these metrics where there are patterns of high job numbers within and adjacent to areas of high unemployment'.

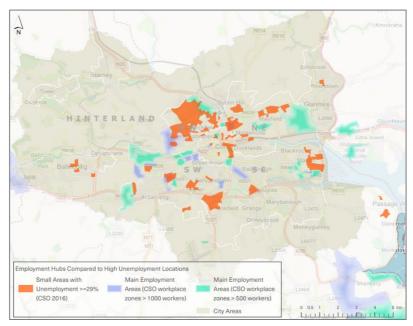


Figure 02.1 SELS Figure 3.3 Relationship between areas with high job numbers and high unemployment (Based on SELS Figure 3.3)

Alongside this, the SELS notes that while the north-west suburb has a relatively high job to worker ratio of c. 1 job/resident worker, at 23%, the unemployment rate was the highest in the city. Allied to this the SELS indicates there are significant trends of cross-city movements for work purposes in the city with the majority of people employed in locations which are different to where they reside⁴.

In relation to the North-West Regeneration Area the Draft DP Objective 10.88 sets out to:

To continue to support the creation a regenerated residential neighbourhood in the North West with associated services and recreational amenities, a good mix of house type and tenure (including age-friendly downsizing opportunities), improved sustainable and active travel, commity services and open space provision

The Draft DP proposes the creation of a North-West City Park, Section 6.46 of the plan sets out that a Park Masterplan and planning permission are to be delivered during the plan period.

⁴ Based on CSO Census of Population 2016 POWSCAR data

03 Key Planning Considerations

03.1 Balanced Housing Mix

An analysis of housing delivery in 2019 indicates that 69% of the 731 residential units delivered in Cork City were social houses. The news that Cork City Council exceeded its 2019 social housing target by 20% is a very welcome and warranted response in the midst of the current housing crisis. However, the fact that just 23% of the 731 houses delivered in 2019 were private scheme units highlights the need for an increased emphasis on the delivery of private housing, in addition to the continued achievement of social housing targets.

The subject lands, which are approximately 5.8 hectares in area, are located in the northwest of Cork City, c. 1.5km to the north-east of Apple's European Headquarters, which employs 5,500 workers. Despite the presence of this large and rapidly growing employment hub in the area the population growth figure for the North-west City Suburb between 2011 – 2016 at 3.22% was significantly below the city average figure of 5.1%, and lower than all but one of the other constituent areas of the city and suburbs.

| Cork City | 2011 | 2016 | % pop change |
|-------------|--------|--------|--------------|
| NW Quadrant | 22,608 | 23,336 | 3.22% |
| NE Quadrant | 24,984 | 25,996 | 4.05% |
| SW Quadrant | 36,927 | 40,442 | 9.52% |
| SE Quadrant | 51,007 | 51,605 | 1.17% |
| City Centre | 21,547 | 24,188 | 12.26% |

Table 03.1 - Population Change by City Areas

While several areas did experience significant population increase in the north-west, these are predominantly social housing developments concentrated in the Blackpool area, the Meadow Hill area of Garranabraher, the North-West Regeneration Area of Knocknaheeney and Coppingers Acre in Churchfield. This raises the issue of what types of housing characterises the North-west City Suburb. The background socio-economic profile research that supports the Draft DP⁵ provide valuable data in relation to the tenure of the existing housing stock in Cork City. The average figure for social rented houses in the city is 13.7%. However, in the North-west City Suburb, the figure for 4 of the 5 constituent neighbourhoods ranges from 30.45% to 52.5%. Conversely, the city-wide figure for private

⁵ Cork City Neighbourhood Profiles and Cork City Socio-economic Summary Profiles prepared by AIRO

rented housing is 23.7% but in these neighbourhoods the figure ranges from 3% to 10.9%. The subject site is within the Fairhill neighbourhood where private rented housing accounts for only 3% of the homes, the lowest percentage across the entire city.

Housing Tenure: % Private Rented

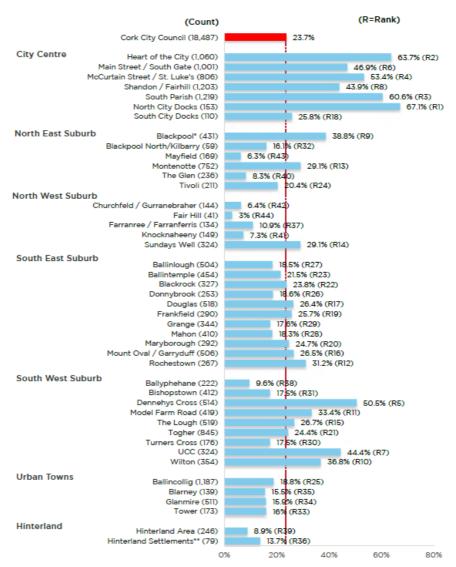


Figure 03.1 % Private Rented Housing by Neighbourhood – based on AIRO data

The commuting figures for the Fairhill and Knocknaheeny neighbourhoods exemplify this emerging pattern in the North-west City Suburb of an outflow of resident workers largely crossing the city for work and a significant inflow of workers to the local jobs. In the Knocknaheeny neighbourhood there is a net inflow of 2,091 workers coming from across the city to work in the 3, 989 local jobs, whereas in neighbouring Fairhill there is a net outflow of 1,273 resident workers commuting out of the area as there are only 85 local jobs (ref Figure 03.2).

The proposed new strategic employment locations, including Fairhill and Hollyhill, will go some way to addressing this significant outflow of resident workers. However, we consider the principal way to stem the inflow of workers and associated unsustainable

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commuting patterns is by re-balancing the housing mix in the area to cater for a wider base, and in particular to redress the deficit of private and affordable housing.

Net Flow of Jobs by Neighbourhood

(+ is an importer of workers, - is an exporter of workers)

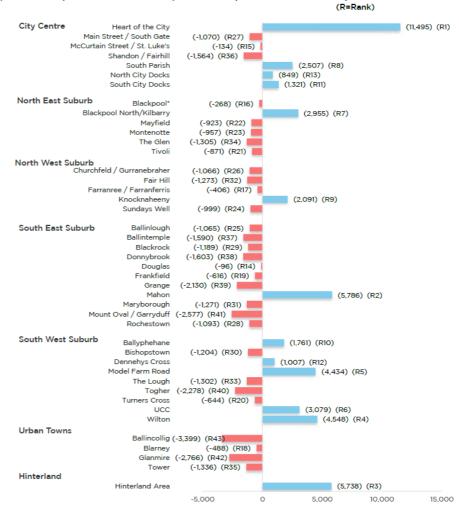


Figure 03.2 % Net Commuter Flows by Neighbourhood – based on AIRO data

This is in line with the RSES concept of sustainable, employment-led growth in settlements in the Cork MASP and would establish a better correlation between where people live and where they work. It would support the implementation of the "five-minute" or "ten-minute" sustainable city model, where short travel time and ease of access via sustainable travel modes is achieved between where people live, work, access services, access recreation and amenity inter alia. Fairhill and Hollyhill are now both recognized as strategic employment areas, where the co-location of a diverse mix of housing is appropriate.

03.2 Public Open Space

The provision of the North-West City Park (Knocknaheeny) has been a long-standing objective of Cork City Council. Its development has been hindered historically by the area's location, falling between two authorities. This legacy issue has now been removed, opening up an opportunity for the future development of the park. An objective for its achievement is included in Section 6.46 of the Draft DP, which sets out that a Park Masterplan and planning permission are to be delivered during the plan period.

The North-west City Suburb already benefits from proximity to a number of sporting and recreational facilities; in the form of Na Piarsaigh GAA Club immediately to the south of the subject site, Larchfield Park, St Vincent's GAA Club, O'Neill Park, Castleview AFC grounds, LeisureWorld Churchfield, Kilmore Park and Nash's Boreen amenity walk. In addition, there are a number of ZO 18 – Landscape Preservation Zones in the area.

However, we consider that the extensive ZO 16 Public Open Space zoning (c. 117 hectares) proposed in the Draft DP, which the subject site form part of, presents challenges, in terms of its usability and security. In this context we propose that these lands which are adjacent to the existing built-up area would be more appropriately used to add balance to the housing tenure offer of the area, which would in addition enhance the security of the public open space by passive supervision of adjoining buildings. The use would also contribute towards delivering consolidated and compact growth in the area.

04Conclusion

Our client welcomes this opportunity to make a submission on the zoning objectives contained within the Draft DP. Our client and the Council are aligned in the goal to support consolidated growth in the Cork Metropolitan area, and in particular in the North-west City Suburb where there is a real opportunity to deliver on sustainable, employment-led growth.

As the net commuter flows for the area indicates (ref Figure 03.2) there is a significant mismatch between the resident working population and the local employment in the North-west City Suburb leading to unsustainable commuting patterns. To some extent this is being addressed in the Draft DP by the introduction of new strategic employment locations at Fairhill and Hollyhill. However, the other element contributing to the unsustainable travel in the area is the large inflow of workers into the Hollyhill neighbourhood. We attribute the scale of this to the current imbalance of the housing tenure mix in the area, with rented social housing being significantly above the city average and in some areas forming the predominant tenure type. Conversely, private rented housing is significantly under-represented in this area.

If the RSES concept of the 'Right Location' is to be achieved new homes must be provided at locations that can support sustainable development in line with the "five-minute" or "tenminute" sustainable city model, where short travel time and ease of access via sustainable travel modes is achieved between where we live, work, access services.

To achieve this in the North-west City Suburb a greater mix of housing types and tenures is required to accommodate the needs of different groups in society. This means that in addition to the continued achievement of social housing targets there is a requirement for the delivery of private and affordable housing.

In this context our client considers that the subject site would be more appropriately zoned as an extension of the adjacent ZO 01 Sustainable Residential Neighbourhoods than the ZO16 Public Open Space as proposed in the Draft DP. In view of the extensive existing provision for public open space in the area, we suggest that consolidated growth in this city suburb would be better served by the development of private and affordable housing on these lands in the interest of the sustainable and balanced development of the area and to improve the alignment of population and employment growth.

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⁶ Section 3.9 RSES