

03 October 2021

Development Plan Submissions
Strategic and Economic Development
City Hall
Anglesea Street
Cork
T12 T997

Our Ref: 501.00805.00001

Your Ref: Fairfield Phase 2

Dear Sir/Madam

Re: DRAFT CORK CITY DEVELOPMENT PLAN 2022-2028

1. INTRODUCTION

SLR Consulting Ireland Limited (SLR) has prepared this submission in collaboration with Green Label Properties on behalf of Dunluce Land Holdings Ltd, owner of lands located between Fairfield Road and the N20 National Road, in Blackpool, Cork City.

Dunluce Land Holdings Ltd welcomes the opportunity to consider and comment on the 'Draft Cork City Development Plan 2022-2028' in light of principal interests in the Cork City Area, a strategic landholding which is in close proximity to the city centre and is adjacent to significant industrial and manufacturing development adjacent to the N20.

This submission would like to request the following amendments to the Draft CDP :

That, subject to appropriate design measures, the residential zoning be extended to include the area highlighted in Figure 1 below.

- The subject lands used to have residential development and should be considered for a resumption of use as residential lands through targeted and appropriate zoning.
- The additional area (are of c. 2 ha) should be zoned residential on the grounds that: There are currently insufficient lands zoned for residential development to facilitate a critical housing need in Cork;
- Draft CDP is not in alignment with the existing National, Regional or Local planning or climate policies and guidance regarding current draft zoning objectives
- The draft Development Plan residential zoning is premature as the Cork City Capacity Study has not been finalised.

- Careful design of the subject lands can facilitate both residential development and open space objectives as set out in the Blackpool LAP
- The draft Landscape Preservation Zone on the subject site is inappropriate for the surrounding area.

A review of the 'Draft Cork City Development Plan 2022-2028' has informed this submission, in tandem with a review of the existing 'Blackpool Local Area Plan 2012' (as extended), the 'Cork City Capacity Study' and the 'Cork Joint Housing Strategy and Housing Need Demand Assessment'. These policy and strategy documents have also been reviewed against the provisions of national and regional planning policy (National Planning Framework 2040 and Regional Spatial and Economic Strategy for the Southern Region). This submission comments on the following draft development plan sections:

- Chapter 2: Core Strategy
- Chapter 3: Delivering Homes and Communities
- Chapter 4: Transport and Mobility
- Chapter 6: Green and Blue Infrastructure, Open Space and Biodiversity
- Chapter 10: Key Growth Areas and Neighbourhood Development Sites
- Chapter 12: Land Use Zoning Objectives

These sections have been compared with National, Regional and Local Policies in Section 3 of this submission.

Context of the Subject Lands

The subject lands which are sought to be rezoned are located c. 1.5km north of Cork City Centre, c. 200m south of Northpoint Business Park and c. 540m northwest of Blackpool Shopping Centre. It is bounded to the north on the north by the N20 / Commons Road, a main thoroughfare leading from Cork to Limerick., to the west and east by existing residential development, and to the south by Fairfield Road and existing residential development. The subject lands are approximately 5.3 hectares in size.

Figure 1 provides a site locational context, while Figure 2 provides a visual context of the subject lands from Commons Road / N20.



Figure 1 Area Subject to the Request for Additional Zoning



Figure 2 View of Commons Ridge from Delux Paints

It is evident from the above that the subject lands are located within an existing residential neighbourhood, in close proximity to the Blackpool Retail Park, the existing industrial areas along the N20 and in close proximity to the city centre. Figure 2 shows the subject lands as a large field which gently slopes eastwards towards the N20.

Previous Residential Use

It is worth noting the existence of Dunluce House, a ruin at the northwestern extent of the subject lands. There is also evidence of previous residential development in the centre of the site bordering Commons Road as well as within the southeastern end of the subject lands as shown in Figure 3.

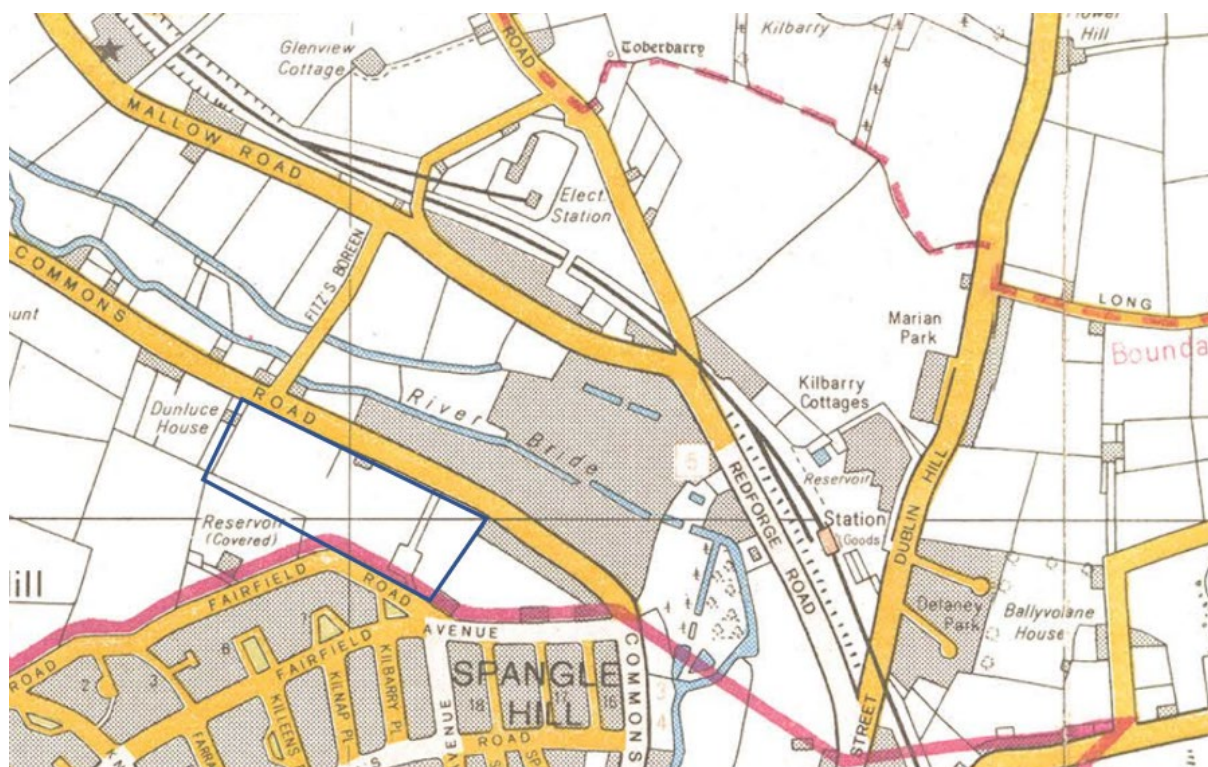


Figure 3: 1964 OS Map of Cork (including the subject lands)

Dunluce House (now in ruins) fronted onto Commons Road (now the N20). It shows up on historic maps dating back to 1870 and appears to have had a significant quantity of lands associated with it—some of these lands are now in the ownership of our client.

In more recent times, as evidenced from Figure 3, a residential landholding was identified in OS mapping. This would have been residential development prior to 1964, which is currently in ruins on the subject lands. A satellite image showing these ruins is shown in Figure 4.



Figure 4 Ruins of Residential Development on the Subject Lands



Figure 5: Dunluce House Entrance

The important point to take away from this site is that residential uses were prevalent on this site up until the recent past, and should be re-established. This can be done through the use of zoning.

2. DRAFT CORK CITY DEVELOPMENT PLAN 2022-2028

Chapter 2 Core Strategy

Section 2.6 of Chapter 2 states the following:

A central function of the Core Strategy is ensuring an acceptable equilibrium in the supply of zoned, serviced land that allows for the projected population growth up to 2028. This requirement is informed by evidence. Cork City Council and Cork County Council jointly commissioned a Housing Strategy and Housing Needs Demands Analysis (HNDA). The study provides a forecast of the type and tenure of housing that will be required in the City and County for the period of the plan, thereby informing the quantum of zoned serviced land required to meet this target

A Housing Needs Demand Assessment has recently been drafted. As of the writing of this submission, only a draft of this document is present online, dated 26th July 2021.

The above section from the Core Strategy indicates that an analysis has been undertaken, yet the Assessment is only in draft stage. It does not appear that the required quantum of zoned serviced land been provided within the draft CDP. The subject lands are considered to be Tier 1 serviced lands which have been overlooked for residential zoning which could facilitate at least 70 units across 2 ha of the overall 5 ha site.

It is noted that the Blackpool/Kilbarry area (item 9 and Item A in Figure 6 of this submission) has been earmarked for both Regeneration Areas and Strategic Employment Locations. Further discussion on this is found later in this submission.

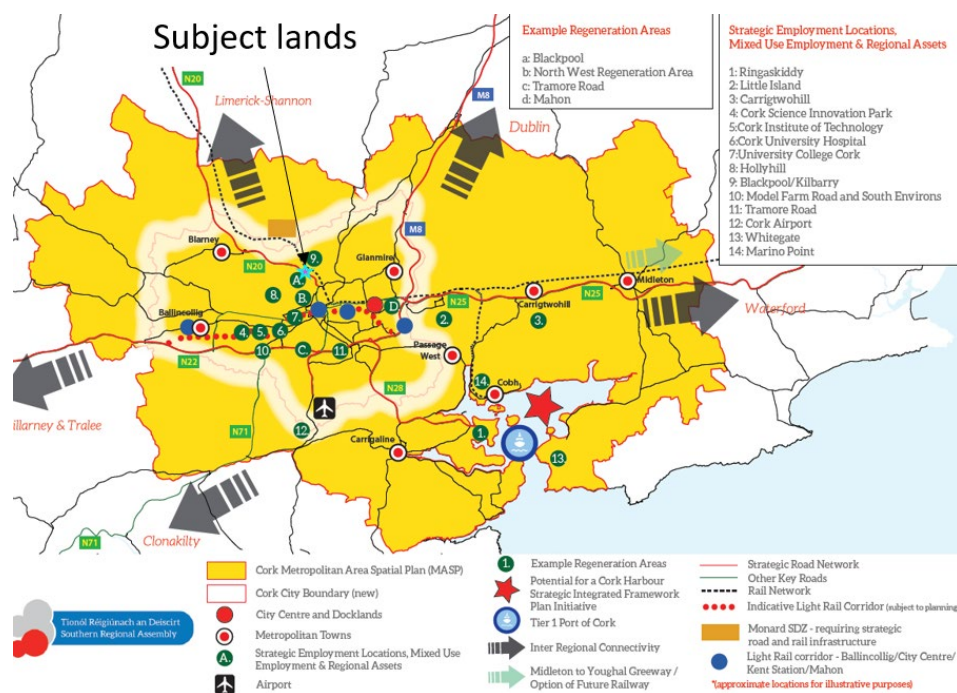


Figure 6 Excerpt from CMATS in Draft CDP Core Strategy

Chapter 3 Delivering Homes and Communities

Page 78 of the Draft CDP notes the proposed mix from the Housing Demand Need Assessment: *“Within Cork City the target is to provide housing for new households at a ratio of 79.5% market homes to 20.5% below-market priced homes. In addition to meeting this new housing need the existing housing waiting list will also need to be housed.”*

We note the following observations:

A planning search of the entire north side of Cork City shows that there have been no major private multi-unit developments receiving planning permission over the last 10 years. While there is no housing of any sort planned for most of the central northern suburbs, the much better-connected inner-city corridor (shown in pink in the draft CDP mapping) area has been subject to a number of planning applications. These are all for social housing however, leaving a gaping gap between the target balance of 79.5% to 20.0% in favour of market price homes and the reality of 0 to 100% in favour of below market dwellings. To illustrate this point, please consider that within 3km of the subject lands, there are a number of social housing projects:

- Green Lane, Blackpool, 112 units, managed by Cluid.
- Redforge Road, Blackpool, 18 units phase 1, managed by Respond
- Redforge Road, Blackpool, 62 units phase 2, managed by Respond
- 27-29 Dublin Street, Blackpool, 10 units, managed by Respond
- Watercourse Road, Blackpool, 37 units
- Wolsey Court, Blackpool, 49 units

- Spring Lane, Blackpool, 8 units
- 37-39 Dublin Street, Blackpool, 5 units
- Knockfree Avenue, Glengarriff Road, Fairhill, 2 units
- 5 Fairfield Heights, Upper Fairhill, 3 units
- Bishop’s Avenue, Farrenferris, Fairhill, 37 Units phase 1, managed by Tuath
- Bishop’s Avenue, Farrenferris, Fairhill, 49 Units phase 2, managed by Tuath
- Croppy Boy, Fairhill, 7 Units phase 1, managed by Tuath
- Croppy Boy, Fairhill, 14 Units phase 1, managed by Tuath

Page 78 of the draft CDP provides guidance on build to rent accommodation, setting out the number of households required from 2022-2028. There is a significant requirement for 1-to-3-person private rental accommodation, which the build to rent model provides. Yet, there are no large build to rent developments which have been granted planning permission. It is submitted that there is insufficient housing in the planning pipeline for the coming years, thereby compounding the problem of increased rent and housing scarcity. It is submitted that, to meet the requirements of housing mix tenure as noted on page 78, the Council must focus on private residential development in proportion to all other developments.

The rents have climbed by 10% over 1 year in Cork City and are now closer to Dublin levels than ever. There is a shortage of serviced, zoned land within Cork City and its suburbs. It is also worth noting that the one large scale apartment development which was granted permission has recently requested a change of use to a commercial use – this is the project at the Sextant site. This is a significant blow to the provision of housing.

Figure 3.5 of the Draft Joint Housing Strategy for Cork County notes that significant drop-off of residential completions across the county from 1970- 2020. At the peak of this period, close to 90,000 completions occurred in 2006 within Ireland as a whole. Since then, the highest quantum of housing completions, accounting for 21,000 residential units has been recorded in 2019. On top of the excessive deceleration of construction activity relative to population growth there have been several months of COVID19 lockdowns in 2020/21 during which construction activity came to a halt. The current lack of supply is not sustainable, given net inward migration, overall population growth and changing demographics that favour more and smaller dwelling units.

It is also worth noting that on page 92 of the draft CDP, Objective 3.3 (a) requires the “*zoning sufficient lands for residential or a mix of residential and other uses to facilitate the delivery of housing*” and (c) requires “*utilising the Cork City Capacity Study prepared as an input into this Plan to identify the development potential of sites capable of residential development*”. New residential zoning has been applied to sites which are adjacent to an existing industrial area, rather than within already residentially zoned lands as evidenced in Figure 5 below.

The proximity to existing residential developments and amenities are crucial for the attractiveness of a project. In this regard the housing estate and shopping district right next to the subject lands play a large part in making it uniquely viable for private development. Part of the lodged planning application adjacent to the subject lands pertaining to the residentially zoned section of the site is for the provision of 9 terraced houses to be sold individually. This planning application is currently subject to appeal (ABP Ref. PL28.309372). If the project is allowed to go ahead then these would be sold to families, the first set of starter homes to be built in the area in several years. DNG Condon estate agents which are based in Blackpool and with whom Dunluce Land Holdings Ltd have been cooperating since 2018

confirmed that there is persistent strong demand from private individuals to purchase their own modern 2 or 3 bed house or duplex within in the Blackpool area. However, such dwellings are simply not on offer at present and are not being planning on any other site.

Chapter 4: Transport and Mobility

Figure 4.8 on page 124 marks out the north of Blackpool/Kilbarry (an area where the subject lands are located) as supportive of development intensification, given the CMATS provision of a new rail station in this area. Given the proximity of this potential new station to the subject lands at less than 800m from the area, it is unusual and possibly counterproductive to keep a Tier 1 serviced site such as the subject lands zoned for future open space, while earmarking serviceable lands further north of the train station for future new residential development.

Chapter 6 Green and Blue Infrastructure, Open Space and Biodiversity

Landscape Preservation Zone ZO 18

The subject lands are located in an area that is zoned ZO -18 Landscape Preservation Zone. The site is located on Commons Ridge (While not apparent in the current mapping, we presume that this area is listed as NW12 in Table 6.6 in the draft CDP, based on the 2015-2021 CDP). The proposed landscape assets to be protected include item G and H – these are:

- **G: Landmarks / Natural Features / Cultural Landscape** – land forming the setting to existing landmark buildings and/or protected structures / buildings of significance
- **H: Public and Private Open Space footprint**, including land with potential for Public Open Space

Draft objectives as noted in Table 1 have been provided at the end of the chapter which require some further examination:

Table 1 Draft Landscape Policies

Draft Objective	Policy Objective Text
Objective 6.9: Landscape	<p><i>d. To protect those prominent open hilltops, valley sides and ridges that define the character of the Cork City Hinterland and those areas which form strategic, largely undeveloped gaps between the main Hinterland settlements from development.</i></p> <p>It is submitted that the subject lands are part of the city core and not part of the hinterland. This is further emphasised by the quantum of newly residential zoned lands to the north of the proposed new Blackpool/Kilbarry train station, the nearness of core city services such as the Blackpool retail park, and the dense residential development which already exists on three sides of the subject lands.</p>
Objective 6.11: Landscape and Development	<ul style="list-style-type: none"> <i>To ensure that the management of development throughout Cork City will have regard for the value of the landscape, its character, distinctiveness and sensitivity in order to minimize the visual and environmental impact of development, particularly in designated areas of high landscape value where higher development standards (layout, design, landscaping, materials) are required.</i> <p>While it is understood that ridgelines are important across the northern part of Cork City, for their views across the city and adjacent hinterlands, the subject lands are not located in an area of high landscape value, falling away from the ridgeline towards the N20. The gradient of the site is constructable for residential development.</p>
Objective 6.12: Landscape Preservation Zones	<p>To preserve and enhance the character and visual amenity of Landscape Preservation Zones through the careful management of development. Development will be considered only where it safeguards the value and sensitivity of the particular landscape and achieves the respective site-specific objectives, as set out in Tables 6.6 – 6.10.</p> <p>It is submitted that there does not appear to be a clear reason why Commons Ridge is a landscape preservation zone. It is an agricultural field. The lands have been classified as a landscape preservation zone for two reasons: G: landmarks/natural features/ cultural landscape, and H: potential land for open space. What does this particular landscape designation protect in regard to Item G? It is noted that the plan for the subject lands according to the North Blackpool LAP is to be planted with trees and turned into a linear park. However, the gradient of the entire site does not support future use a park. It is</p>



Draft Policy Objective	Objective Text
	submitted that both a residential and open space zoning on the subject lands can be supported, provided permeability to the surrounding residential areas, and access to the N20 and Blackpool.
Objective 6.14 Cork City View Management Framework	<p><i>b) Development proposals will be assessed against their impact on the designated view if it falls within the foreground, middle ground or background of that view. New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the designated views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views.</i></p> <p>There are no protected views from or across the subject lands. There are two local views shown in the Blackrock LAP, but these are not shown in the CDP.</p>

We note that there are no protected views across the subject site in Map 4 of the draft CDP as evidenced by Figure 7. Also, we note that part of the subject lands denotes existing development as evidenced by the colouration of the map in Figure 7.



Having carefully reviewed the draft development plan objectives in Table 1 above, it is considered that the draft zoning on the subject site is inappropriate for the following reasons:

- 1) there are no protected views to or from the subject lands
- 2) The site is not at the top of a ridgeline
- 3) The existing top of the ridgeline already has significant existing residential development
- 4) The site is surrounded on three sides by existing residential development, and bounded by the N20 and existing industrial development to the east
- 5) The site can comfortably facilitate additional residential development while simultaneously providing adequate space for a linear park.

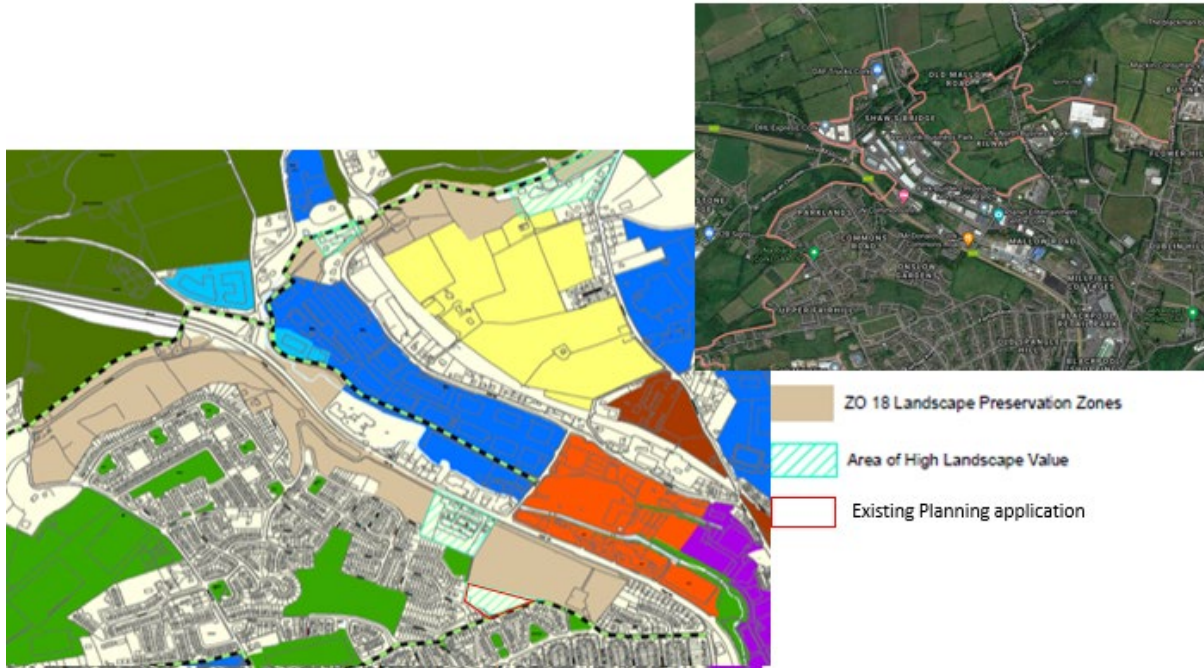
Chapter 10: Key Growth Areas and Neighbourhood Development Sites

Page 415 of the draft City Development Plan sets out the city suburb objectives for the Blackpool/Kilbarry area of the city. This area is listed as an area of key development, citing the CMATS proposal for a train station at Blackpool / Kilbarry. Section 10.304 states, in relation to this train station that: *“This will support the regeneration of Blackpool and the proposed residential development along Old Whitechurch Road and new mixed-use development to the north of Kilbarry Business Park.”*

The subject lands related to this development submission are located within this key development area , approximately 790m west of the proposed train station.

Objective 10.75 states, in relation to the Blackpool / Kilbarry expansion area that the council will *“support compact growth and development of Blackpool / Kilbarry Expansion Area as a strategic city expansion area, as identified in the Core Strategy. All development shall be designed, planned and delivered in a coordinated and phased manner, using a layout and mix of uses that form part of an emerging neighbourhood integrated with the wider area.”* (own emphasis added).

However, as evidenced in Map 04 of the draft CDP, it appears that the expansion of Blackpool/Kilbarry is extending into the urban edge that the landscape preservation zone is meant to protect:



National policy highlights the importance of infill development in urban locations, particularly within 1km of transportation and employment hubs. It is submitted that the subject lands fall within this categorisation. The lands have proximity to not only the Blackpool / Kilbarry train station, but to the important Blackpool Retail Park – both critical elements to compact growth. These lands should have been considered prior to going further afield for residential development. The sequential test therefore appears to have been ignored in the zoning of lands.

Chapter 12: Land Use Zoning Objectives

Site is zoned 'ZO 18 Landscape Preservation Zone'

“Landscape Preservation Zones (LPZs) are areas zoned ZO 18 Landscape Preservation Zones (see Chapter 12 Land Use Zoning Objectives) in order to protect their character and amenity value. These areas are considered to be highly sensitive to development and as such have limited or no development potential. Typically, the landscape character of these areas combines distinctive landscape assets such as topography, slope, tree cover, setting to historic structures, open spaces and other landscape assets – see Table 6.5.

The objective of LPZs is to preserve and enhance the landscape character and assets of the sites. There is a presumption against development within LPZs, with development only open for consideration where it achieves the site-specific objectives set out in Tables 6.6-6.10. In exceptional circumstances, there may be limited scope for development to enable existing occupiers to adapt existing buildings to their evolving requirements, providing that the form or nature of development is compatible with the landscape character of the area. This might include a change of use or minor extensions.”

Map 04 in Volume 2 notes that the site is zoned ZO18 “Landscape Preservation Zone”, yet it is unclear what the specific site objective of this area is. Tables 6.6-6.10 as noted above provides no proper guidance as to the basis for the landscape protection for this site. Items G and H as discussed in the comments on chapter 6 are unclear and leave some confusion as to why this preservation zone has been placed on this site. If the Council’s objective as shown in the Blackpool LAP and previous CDP is to develop the subject lands as open space in the future, then perhaps the zoning should have been open space rather than a landscape preservation zone such as the draft CDP indicates.



We would like to draw your attention to the potential of allowing residential development in tandem with an open space objective on the subject lands. A planning application, currently under appeal with An Bord Pleanála has been submitted for lands to the southwest of the subject lands. A draft masterplan was prepared during the pre-planning phase of the aforementioned planning application whereby residential in tandem with open space, as shown in Figure 10.

This developer led masterplan shows residential expansion into lands to the north and east, with a softened landscape edge, facilitating access and open space as per the zoning plans outlined in the Blackpool LAP. Such a plan would facilitate the lower elevations of the subject lands for use in public open space while providing permeability through the site and between the surrounding residential areas and the Blackpool area.

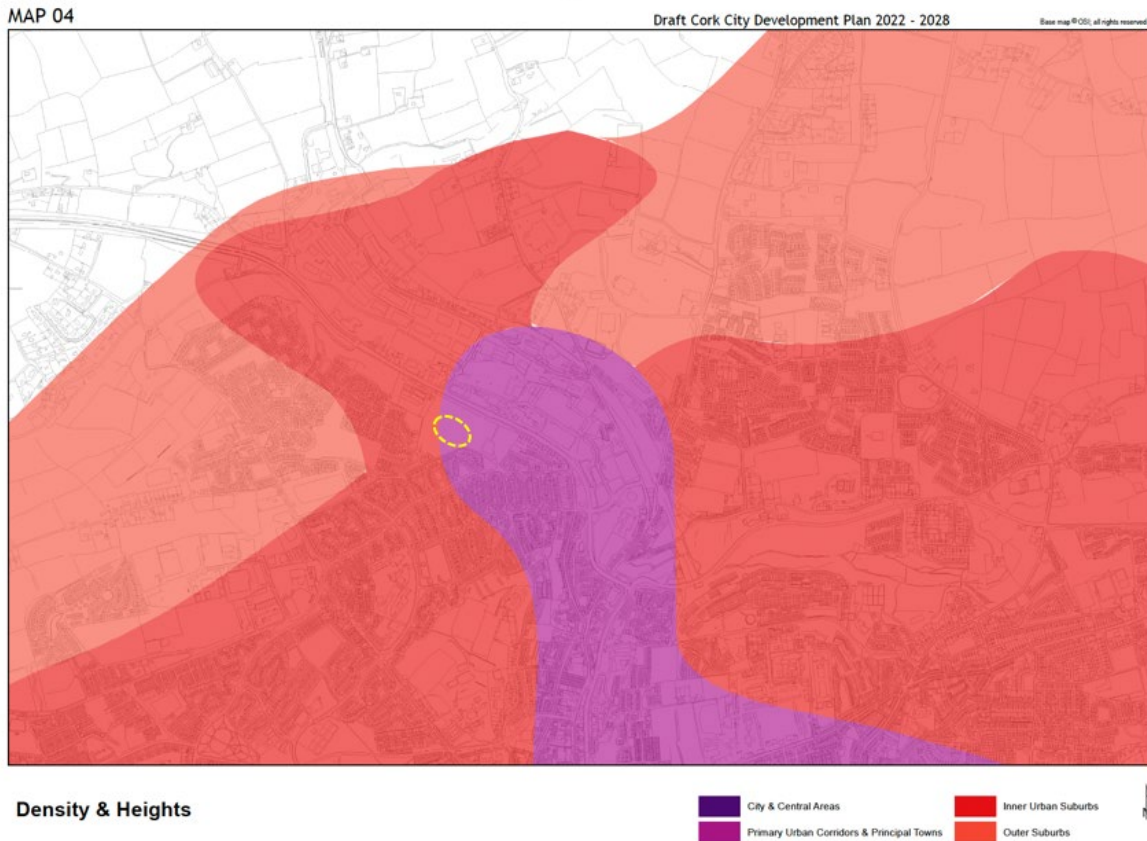
Existing Planning Application



The current split zoning in the 2014-2020 CDP provides for an arbitrary, linear delimitation or subdivision of this site in residential development land on the one side (for which a planning application has been lodged) and landscape preservation zone on the other hand. In fact there is no differentiation in terms of gradient or vegetation between the area marked as residential and the immediately adjacent space marked as landscape preservation zone. By respecting the central corridor definition of the location of these lands at large (draft development plan Cork City 2022-2028, Figure 11 below) and allowing for appropriate development to take place on selected areas within the subject site it will be possible to open up over 5 Ha of enclosed and neglected lands within the main city arteries for use as inner city recreational green/open space while also providing much needed residential development (c. 2 ha) on the urban edges of the lands.

Consultation with Cork City Council councillors regarding these lands has been undertaken in tandem with meetings with Cork City planners for the subject lands. Discussions have been fruitful and while a variety of different views have been encountered as to the ideal density of development, the general mood is for more development to happen in a controlled way, hand in hand with additional transport modes and an opening up of the site for the local community's benefit.

Map 4 of the draft Cork City Development Plan also notes the strategy for density and heights across the city. It is noted that the subject lands are located in an area that is seen as a central area to Cork City, and that densities and heights are to reflect accordingly as shown in Figure 11.



3. DISPARITIES BETWEEN NATIONAL/ REGIONAL AND LOCAL POLICIES

Draft CDP is at odds with existing National, Regional and Local policies as evidenced in the following sections:

National Planning Framework 2040

The NPF places great importance on the role of Cork City and County as a major driver of growth and innovation in Ireland. Cork City and its metropolitan area is recognised as the key urban centre of the south with significant growth potential and is envisaged to grow by at least 50% by 2040. The NPF strategy sets out a target of 550,000 households to be provided to 2040 to facilitate the population growth expected within this timeframe. Of this, NPO3a requires the delivery of at least 40% of all new homes within the built-up footprint of existing settlements. Given the viability constraints for dense inner city (re)development, this remains a hard to reach target. It has to be noted that no private, market based development is being envisaged in the greater Blackpool area within the footprint of the existing settlement. The vast proposed new zoning at Kilbarry represents a claim on swathes of untouched greenfield land whereby the subject property of this report is located within a built up area.

National Strategic Outcomes require compact growth of cities, towns and villages. The NPF also projects that the population of the southern region of the country will grow by between 340,000 and 380,000 people by 2040, bringing the combined population of Cork, Waterford, Limerick and Wexford to almost two million. An additional 225,000 jobs are set to be created over the same time span, on top of the 655,000 jobs there are today. Many of these new positions will be concentrated in the knowledge economy where employers increasingly favour secondary employment hubs rather than

crowded city centres, a trend that has accelerated since the advent of COVID19. Blackpool town centre is poised to become more attractive and prominent in coming years.

The Draft Cork Joint Housing Strategy notes in Table 2-1 that the projected population through the strategy period allows for an increase in population of between 113,500 and 141,000 by 2031. The draft CDP has set an ambitious population target of 35,394 for the Northeast Suburbs of Cork City by 2028 (the lifetime of the development plan), and a target of 3,435 housing units over this period. It also notes on Page 38 that

“Viability remains an issue across most large-scale apartment schemes, particularly those that have greater densities. Recent research by EY in Cork City suggests that viability issues including high construction and development costs are negatively affecting apartment delivery, with delivery rates relatively low when compared to Dublin. New apartments in Cork City tend to sell or rent at higher prices as a result, while the build-to-rent sector is currently under-delivering in Cork.”

In short market conditions are barely suitable for apartment led development, as evidenced for John Cleary Developers recent decision on the Sextant site to change planning permission for purpose-built office accommodation. Viability will continue to put a strain on future supply in central locations where apartments are most welcome. Instead offices, hotels and student accommodation see the light of day. Medium density development in and around major neighbourhood centres are the next best option and currently the only viable alternative if compact growth and the reduction of car usage are to remain in the focus.

Across the whole of Cork City projected supply figures have to be considered cautiously as reliance on apartment heavy BTR schemes can leave the overall numbers short of expectations. Especially when sites are not yet serviced, time and cost to completion can prove prohibitive. In the face of an acute housing crisis it is worth while considering all options available. On the subject site the actual construction of up to 4 storey apartment buildings can be realized at an acceptable cost level and the availability of all services and amenities means that supply can come on stream quickly. Thanks to the uniquely favourable topography with the gentle slope downwards, apartments can be provided without a prohibitively expensive lift shaft and core designs. The resulting own door units are more attractive to occupiers and easier to maintain. This should be the default option if the goal is to provide compact growth within the central corridor.

Current residential zoning does not appear to take into consideration the realities of the housing market however. In direct opposition to what the draft Joint Housing Strategy points out those lands which are newly zoned for residential development are adjacent to an existing industrial estate and not fit for quality living. We respectfully point your attention back to the following National Policy objectives that are of direct relevance to your zoning objectives within Cork City and its neighbourhoods:

National Policy Objective 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.*

In this regard we would like to point out that the subject site had been in residential use in the past and that the project would thus represent an opportunity for regeneration as opposed to widening the building footprint of the city onto previously untouched green areas.

National Policy Objective 35: *“Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”*

The current zoning objective for the lands to the north of the subject parcel allows for approximately 600 units over an area of approximately 19 ha which is set against an existing train line and is cut off from the rest of Blackpool. Half of this land is within 1km of the proposed Blackpool/Kilbarry train station. Current National policy and guidance requires higher density as per

- Climate Action Plan 2019 targets which promote the viability of public transportation and reduce carbon footprints,
- Section 2 Item 1 of the Design Standards for New Apartments which require densities greater than 45 units per hectare within 1km of a high frequency transportation stop

While it is understood that a sequential test for lands in proximity to major transportation points facilitates higher density, we respectfully submit that large scale apartment development is unlikely to be facilitated in the current housing market given the expense of associated construction and development costs (specifically high density BTR) all the while there is already an over-saturation of social housing. The current zoned lands are un-serviced greenfield lands which should ideally remain undeveloped to prevent further urban sprawl.

Given this information as outlined above, it is considered that the current zoning on the subject lands has not been considered in light of national climate and planning policy / guidance or strategic outcomes for the provision of residential properties. It is likely that demand will outstrip supply in the local housing market for many years to come unless realistic build cost assessments are considered for land zoning.

As per the recent planning application Dunluce Land Holdings Ltd is committed to providing foremost medium density housing that is both affordable to build and to operate. In light of the favourable location and the unique suitability of the subject land it is considered that the current zoning should be re-assessed in light of national planning policy and strategic outcomes for the provision of residential properties.

Regional Spatial and Economic Strategy for the Southern Region

Among its main goals are promoting economic prosperity, accommodating growth and sustainable development in suitable places, protecting and enhancing the environment, combatting climate change, improving towns and cities, supporting rural development and identifying priorities for infrastructure development.

The population forecast for the southern region is also echoed in the RSES for the Southern Region with a forecasted population increase of 380,000 across the southern region by 2040. Also, as with the NPF, the RSES notes the importance of compact growth as one of the southern region's overarching strategies.

It is considered that the current zoning on the subject lands has not considered the requirements for population growth or the principles of compact growth of the State's second city.

Blackpool Local Area Plan

Upon examination of the LAP, it is worth noting a significant discrepancy related to the zoning of the subject lands. Paragraph 3.50 (Building Heights) notes the following: 3.50 *"The plan area should be developed with low to medium-rise buildings. In general, medium-rise buildings ranging between 3 & 5-storeys should be located within 500 metres of the planned rail station, and 2 & 3-storeys beyond the 500 metres radius. In exception, local landmark buildings could highlight important road junctions and civic spaces. Residential buildings in and around existing residential blocks should not exceed 4-storeys in height. Buildings in excess of 6-storeys are considered to be inappropriate."* In Figure 12 it is noted that 3 and 4 storey developments have been proposed within an area that is marked as an "Area of High Landscape Value" in the draft City Development Plan (Figure 13).



Figure 12 Excerpt from Figure 3.6 of North Blackpool LAP



Figure 13 Excerpt of Map 4 of Draft City Development Plan

Given the ZO 18 zoning objective proposed for the subject lands as a landscape preservation area, it is considered that the Local Area Plan recognises 2-4 storey structures both at the top and bottom of Commons Ridge (see Figure 9) – this undermines the credibility that this small parcel of land is a landscape that requires a preservation area.

4. CONCLUSION

After careful consideration of the draft CDP, in tandem with the draft Housing Needs Demand Assessment, existing Blackpool Local Area Plan, Regional Spatial Economic Strategy for the Southern Region and the National Planning Framework that a better solution for zoning can be achieved for the subject lands. We respectfully request that the zoning objective on the subject lands is amended to residential in light of the following points:

- The draft Landscape Preservation Zone on the subject site is inappropriate for the surrounding area.
- The subject lands used to have residential development and should be considered for a resumption of use as residential lands through targeted and appropriate zoning;
- The additional area (are of c. 2 ha) should be zoned residential on the grounds that: There are currently insufficient lands zoned for residential development to facilitate a critical housing need in Cork;
- Draft CDP is not in alignment with the existing National, Regional or Local planning or climate policies and guidance regarding current draft zoning objectives
- The draft Development Plan residential zoning is premature as the Cork City Capacity Study has not been finalised;
- Careful design of the subject lands can facilitate both residential development and open space objectives as set out in the Blackpool LAP;

A revision of zoning on the subject lands has the potential to provide terraced residential development for at least 70 units (c. 35 UPH or more) across a 2 ha section of the 5 ha subject lands while still providing a significant area for open space development.

Yours sincerely,
SLR Consulting Ireland

A handwritten signature in blue ink that reads 'Crystal Leiker'.

Crystal Leiker
Associate Planner