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Planning Department  
Cork City Council  
City Hall  
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Cork  
T12 T997

04 October 2021

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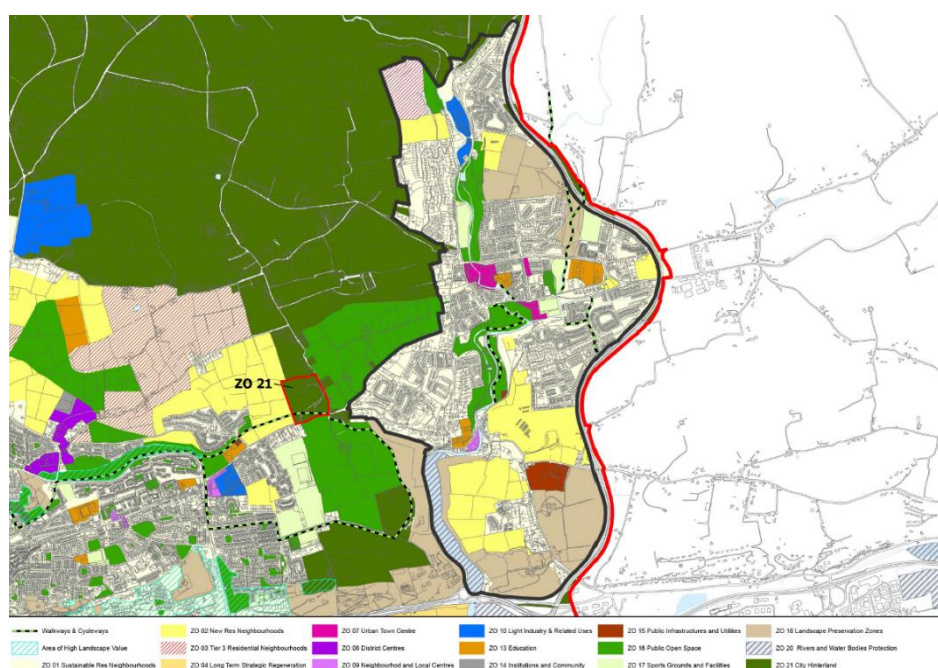
486211

**Re: Submission to the Draft Cork City Development Plan 2022 -2028 in Respect of the Rezoning of lands to ZO 14 - Institutions and Community in the Cork City Development Plan 2022 -2028**

Dear Sir/ Madam,

This submission has been prepared on behalf of Murnane & O'Shea Limited in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 - 2028 (Draft CDP) and more particularly to the Council's draft policies and zoning objectives for Institutional and Community Uses. We consider that lands proposed to be zoned ZO 21 – City Hinterland in the Draft Development Plan in our client's ownership are eminently suited to the delivery of much needed community and institutional facilities in Ballyvolane. Our client's lands which are located off Old Youghal Road are outlined in Figure 1.1 below and in the accompanying maps prepared by Deady Gahan Architects.

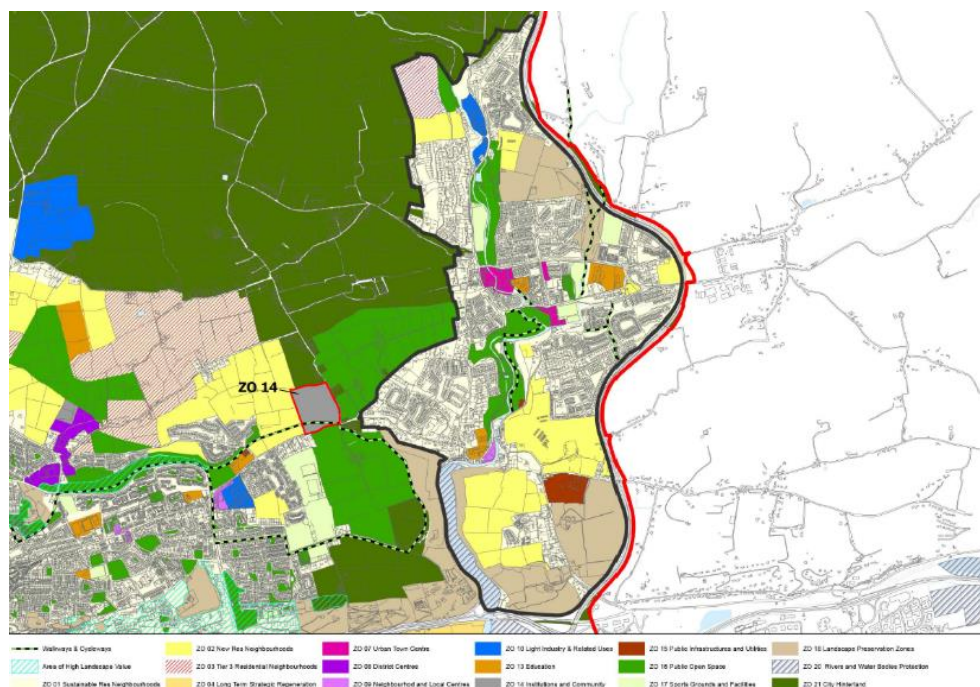
Figure 1.1 Current Zoning Objective of Subject Lands



## 01 SUBMISSION REQUEST

We request that the lands subject to this submission are rezoned from ZO 21 – City Hinterland to Objective ZO 14 – Institutions and Community in the Cork City Development Plan 2022 -2028 where the stated aim is “*to provide for and protect institutional and community uses*”. We are of the opinion that the lands fronting Ballyhooly Road and bound to the east and west by lands zoned New Residential and Public Open Space represent a significant opportunity to deliver Institutional and Community Uses during the lifetime of Cork City Development Plan 2022 – 2028. An extract illustrating our client’s proposed zoning of lands in their ownership prepared by Deady Gahan is provided below.

Figure 1.2 Proposed Zoning Objectives of Subject Lands



## 02 PLANNING CONSIDERATIONS

The rezoning of our client’s lands to ZO 14 – Institutions and Community in the Cork City Development Plan 2022 -2028 would support the city regeneration and expansion of Ballyvolane where the aim is to provide “*a mix of new neighbourhood uses in suitable underutilized locations*”. The Draft Plan envisages ZO 14 – Institutional and Community zoned lands to apply to “*large educational, healthcare and other institutions and community facilities. These are generally locally or nationally important, long established uses with a variety of characteristics and built forms, and they play an important role in providing key strategic services for communities across the city and often much further afield.*” We submit that the site specific locational characteristics of the subject lands would support the designation of our client’s lands as ZO 14 – Institutional and Community where the surrounding land uses would be complementary in nature. The imminent development of the Northern Distributor Road would further enhance the suitability of these lands for important institutional and community land uses. The Draft Plan acknowledges that “*there is a continuing and growing need for nursing and elder care homes such as a nursing home and assisted living*”. In our

opinion the lands subject to this submission can deliver specific facilities and accommodation necessary for the older cohort of the population.

## 02.1 The Delivery of Nursing Homes and Assisted Living Developments

The Draft Plan sets out that “An ageing population and under-occupation of Cork City’s housing stock mean that providing housing products that suit “rightsizing” (downsizing) (to release family units for families) are a key priority for Cork City.” In recognising the need to deliver accommodation and living facilities specially targeted at the older population, an indicative masterplan to demonstrate how our client’s lands could be developed has been prepared by Deady Gahan Architects. In addition to the provision of a nursing home to accommodate c. 100 no. bed spaces, the masterplan also indicates where independent living units could be integrated with the adjoining land uses while taking advantage of the proposed walkway/cycleway objective.

Figure 1.3 Indicative Masterplan



Objective 3.10 – Housing and Community for Older People (Age Friendly Housing) in the Draft Plan states that “Cork City Council will actively seek to meet the housing and community needs of older persons...” including “...integrating community facilities within a range of housing designed for the elderly such as assisted living homes and clusters (with support, transition clusters (combining mainstream and supported living) and step-down units (with care), and specialized care homes”.



As demonstrated in the indicative masterplan, the rezoning of our client's lands to ZO 14 – Institutional and Community would enable our client to deliver a range of age friendly housing in a community setting in accordance with the guidance set out in the Draft Development Plan. We consider that the ZO 14 – Institutional and Community zoning objective would provide more flexibility in responding to the specific development requirements of nursing home facilities.

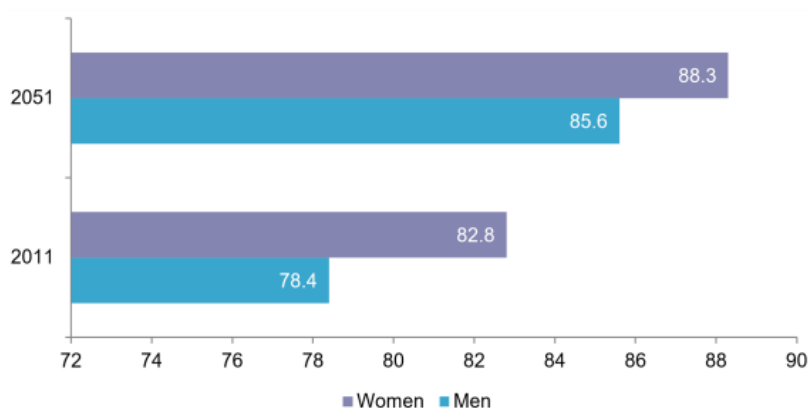
It should also be noted that the existing buildings comprising a gate lodge and country house on the site are listed on the National Inventory of Architectural Heritage (Ref. 20860001 and 20860002) for their architectural, artistic and social interest. The future development of these lands will therefore need to have regard to the sensitivities of integrating these building with any potential uses. The delivery of complementary and viable uses will safeguard the future of the heritage assets. We consider that the development of a nursing home could be successfully integrated with the existing buildings by utilising the country house as the formal entrance. It is our opinion that the designation of our client's lands as ZO 14 – Institutional and Community is the most appropriate and efficient use of these lands.

Notwithstanding the above, we note that there is c. 2 ha of ZO 14 - Institutional and Community Zoned lands zoned in the Draft Plan to the west of the Ballyvolane. Given the significant need for a variety of health, community, education and primary care related uses that will be needed to support the urban expansion area of Ballyvolane we are of the opinion that the quantum of ZO 14 - Institutional and Community lands currently zoned would not be adequate to meet the anticipated need during the lifetime of the forthcoming Development Plan.

The Institute of Public Health report on Ageing and Public Health, 2020<sup>1</sup>:

- The population is aging and this is going to accelerate over the coming decades.
- The population aged 65+ was estimated at 696,300 in 2019. It is projected to more than double to c.1.6 million by 2051 in ROI alone.
- In 2019 one in seven people on the island of Ireland was aged 65 or over. It is projected that one in four people (26%) will be over the age of 65 by 2051. Largest rises will be in the 80+ category.
- Life expectancy is on the sharp rise according to CSO:

Figure 1.4 Projected Increase in Life Expectancy in ROI, 2011 - 2051



<sup>1</sup>[www.publichealth.ie](http://www.publichealth.ie)

## Location Justification re Open Space / Amenity of Site

Although the NPF does not provide any specific guidance relating to the appropriate location of nursing home facilities it does contain a number of high-level NPO's relating to the creation of sustainable communities and an 'age friendly' society. Specifically, NPO 27 of the NPF seeks to improve existing communities by ensuring that the design of our communities prioritizes walking and cycling accessibility, and integrating physical activities for all ages.

Regarding the delivery of appropriate services and age friendly communities, NPO 30 states that local planning policies need to reflect the specific needs and requirements of the elderly population.

## Supporting Social Inclusion

'Housing for All' identifies the need to expand housing options for older persons. Provision of accommodation for older people is a key housing action item. Some extracts on improving housing options and maintaining older people in/near communities are provided below:

*"The prevalence of homelessness, increasing rents and the **restricted options for older people or people with a disability** are among the most pressing issues."*

*"It is imperative that we plan for our ageing population. Local Authority Housing Delivery Action Plans (see section 2.2.2) will set out how dedicated social housing provision appropriate to the needs of older people will be delivered, matching the scale and extent of housing need for older people identified. This will focus specifically on delivery of housing appropriately sized and located for older people..."*

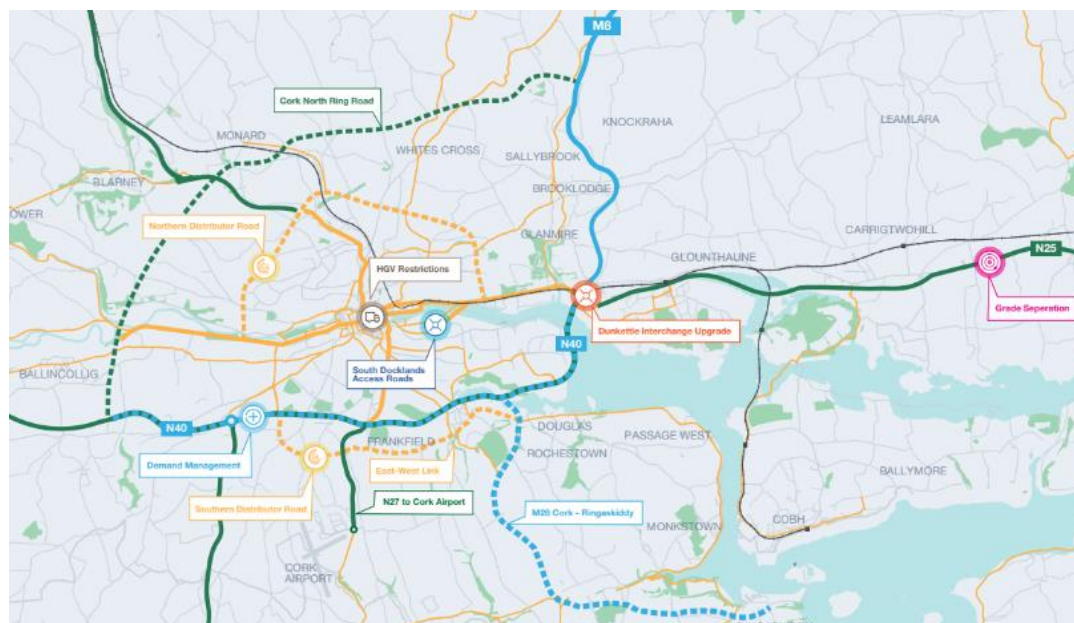
*"Local Authorities must also consider the needs of older people in the wider planning process. In this regard, the new HNDA Framework, published in April 2021, specifically requires consideration of the housing needs of older people."*

### 01.1 Proximity to the Northern Distributor Road

The delivery of the Northern Distributor Road (NDR) will significantly enhance the connectivity of the subject lands to the surrounding suburban area and is considered a 'critical enabler' in the Draft Plan. We note that works to the Ballyhooly Road from North Ring Road junction to Dublin Hill Link Road and the North Ring Road from Riverview Estate to Ballyhooly Road junction will form part of the NDR. The NDR which is currently at the design stage will provide for orbital public transport and vehicular movements, in addition to improving cycle and pedestrian connections.

The Cork Metropolitan Area Transport Strategy indicates that the implementation of the Northern Distributor Road will provide greater connectivity between north Cork and key locations such as Cork University Hospital, University College Cork, Munster Technological University and Blackpool.

Figure 1.5 Extract from CMATS



The delivery of improved connectivity to north Cork will further enhance the desirability of the subject lands for Institutional and Community land uses.

## 01.2 Complementary Land Uses

The Draft Plan recognises that Institutional and Community zoned lands are “*in many cases... located in suburban areas and/or adjacent to residential uses.*” We consider that the zoning of Institutional and Community lands uses is eminently suited adjacent to lands zoned ZO 02 – New Residential Neighbourhoods.

Community and Institutional land uses play an important role in the successful delivery of sustainable neighbourhoods. We re-iterate that Ballyvolane is identified as an area for city regeneration and expansion where the concept of ‘a 15 minute city’ would be expected. As such it would be anticipated that the Ballyvolane neighbourhood and environs would have the capacity to offer a range of health, education and community infrastructure to support the urban expansion of Ballyvolane. We consider that the rezoning of our clients’ lands would support the delivery of localised facilities and services for the significant increase in population that is envisaged.

The lands to the east and south of the subject site are zoned ZO 16 – Public Open Space where the aim is “*to protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas and amenity facilities*”. The zoning and delivery of Institutional and Community uses at this location would provide an appropriate east-west transition and consolidate the public open space as part of the Ballyvolane neighbourhood expansion. The public open space would otherwise be largely disconnected from the areas to the east identified for development. In our opinion the potential of the lands zoned public open space to the west would not be maximised. The rezoning of our client’s lands from ZO 21 – City Hinterland to ZO 14 – Institutional and Community would represent the proper planning and sustainable development of this excellently located site by providing important connections between adjoining zoned lands.

## 02 REQUEST

We welcome the opportunity to make this submission to the Stage 2 Public Consultation Draft City Development Plan 2022-2028. As outlined in this submission, we consider that the subject lands should be rezoned to ZO 14 – Institutional and Community in the next phase of the Development Plan. A summary of the rational is provided below:

- Our client's lands have the potential to respond to the need for accommodation and living facilities specially targeted at the older population. The indicative masterplan illustrates an age friendly housing development comprising a nursing home and assisted living area that could be accommodated on the site.
- The future development of the subject lands will need to have regard to the existing buildings on site which are listed on the National Inventory of Architectural Heritage (Ref. 20860001 and 20860002). As demonstrated in the indicative masterplan, the development of a nursing home could be successfully integrated with the existing buildings by utilising the main country house as part of the formal entrance and therefore safeguarding the heritage asset.
- The quantum of ZO 14 - Institutional and Community lands currently zoned in the Draft Plan would not be adequate to meet the anticipated need for of health, community and primary care related uses during the lifetime of the forthcoming Development Plan.
- The improved connectivity between north Cork and key locations such as Cork University Hospital, University College Cork, Munster Technological University and Blackpool following the implementation of the Northern Distributor Road (NDR) will significantly increase the desirability of the subject lands.
- The rezoning of the subject lands to Institutional and Community would support the delivery of localised facilities and services for the significant increase in population that is envisaged, particularly for the older cohort of the population. Institutional and community zoned lands have the flexibility to provide a range of health, education and community infrastructure to support the urban expansion of Ballyvolane.
- The zoning and delivery of Institutional and Community uses at this location would complement the adjoining New Residential Neighbourhood land use zoned in the Draft Plan and consolidate the public open space as part of the Ballyvolane neighbourhood expansion area.

We request that the lands outlined in this document are rezoned from ZO 21 – City Hinterland in the Draft Development Plan to ZO 14 – Institutional and Community in the next phase of the Development Plan process.

Yours sincerely



Harry Walsh  
HW Planning





SITE LOCATION MAP- SCALE 1:20000@A3

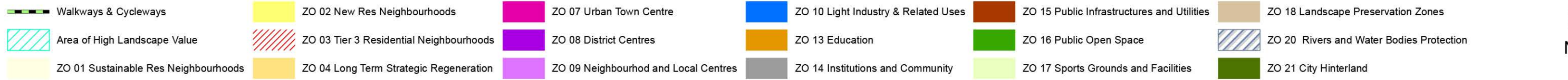
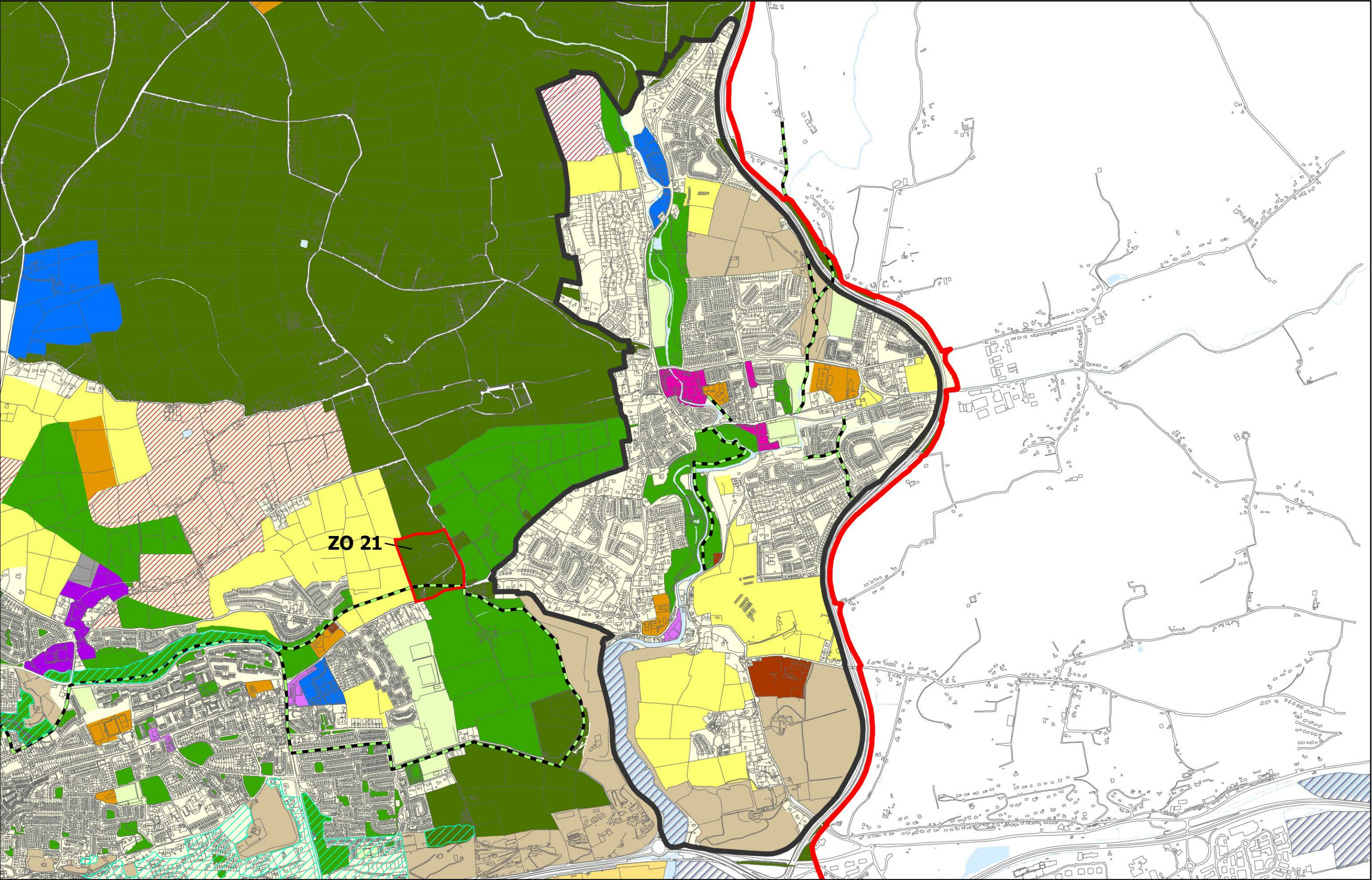
LANDS IN BALLYVOLANE  
PROJECT NO.: 21172  
DRAWING NO.: 21172-SK-005  
DATE: 04.10.2021  
SCALE: 1:20000@A3



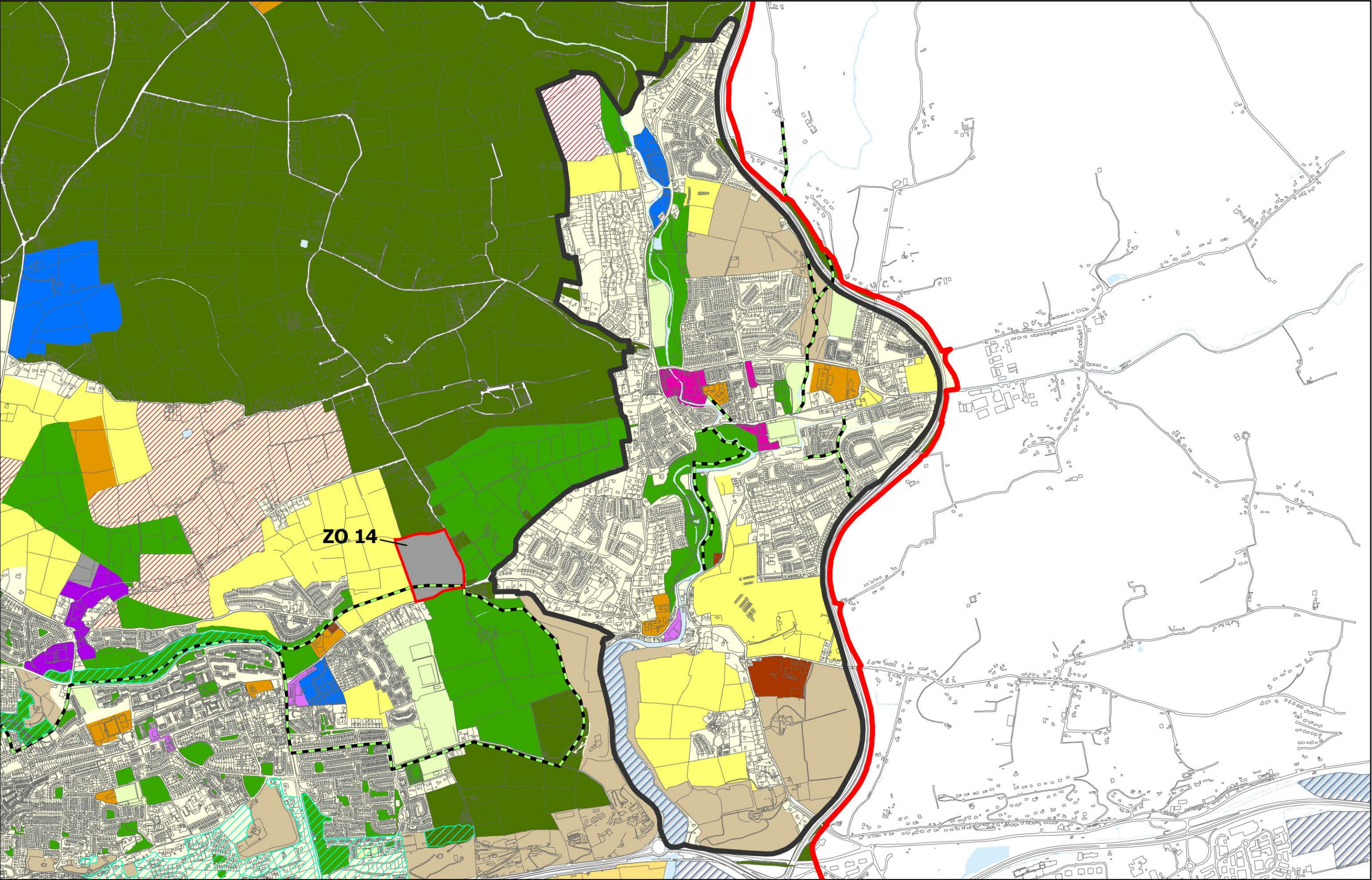
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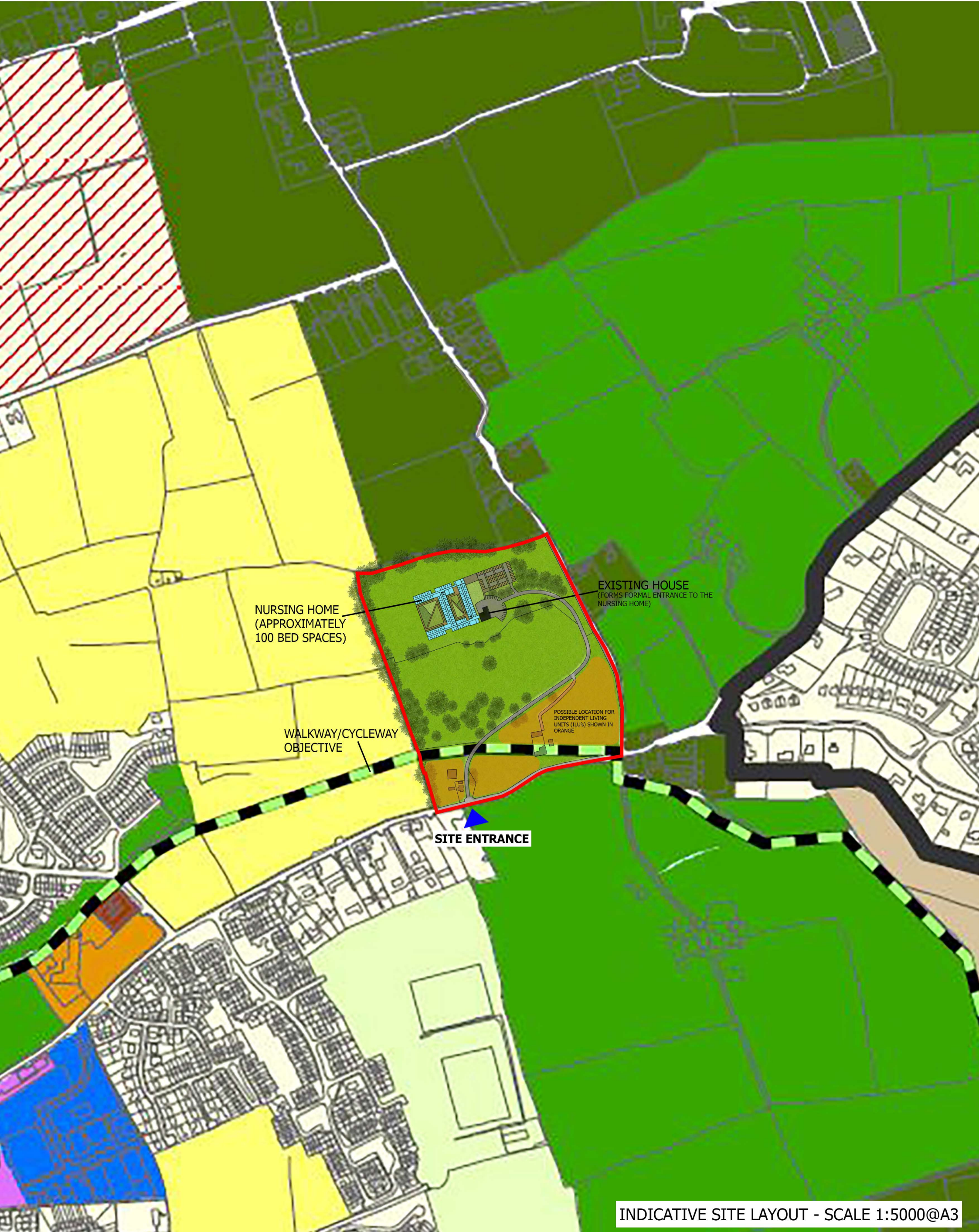
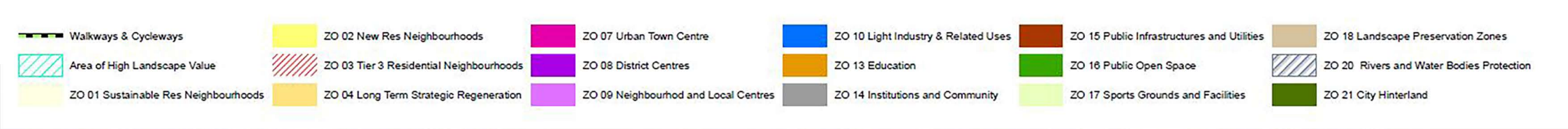














- Walkways & Cycleways

Area of High Landscape Value

ZO 01 Sustainable Res Neighbourhoods
- ZO 02 New Res Neighbourhoods
- ZO 03 Tier 3 Residential Neighbourhoods
- ZO 04 Long Term Strategic Regeneration

ZO 07 Urban Town CentreZO 08 District CentresZO 09 Neighbourhood and Local CentresZO 10 Light Industry & Related UsesZO 13 EducationZO 14 Institutions and CommunityZO 15 Public Infrastructures and UtilitiesZO 16 Public Open SpaceZO 17 Sports Grounds and FacilitiesZO 18 Landscape Preservation ZonesZO 20 Rivers and Water Bodies ProtectionZO 21 City Hinterland

INDICATIVE SITE LAYOUT - SCALE 1:2000@A3