



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

Lands at Nash's Boreen, Hollyhill, Co Cork.

Prepared in October 2021 on behalf of
Adrian Conlon

Coakley O'Neill Town Planning Ltd.

Document Control Sheet

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1.0 INTRODUCTION

1.1 We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, are instructed by our client, Adrian Conlon, to make this submission to the Draft Cork City Development Plan 2022-2028 in respect of lands in his ownership at Hollyhill, Knocknaheeny Cork City.

1.2 Under the Draft Cork City Development Plan 2022-2028, the subject lands are proposed to be zoned as "Public Open Space".

1.2 Our client seeks a change to this zoning proposal by way of amending the current "Public Open Space" zoning objective to the south of Nash's Boreen to include for "Residential" development.

1.3 This submission sets out the strong planning rationale that supports the amendment sought.

2.0 SITE LOCATION AND DESCRIPTION

2.1 The lands are in the North Environs of Cork City, approximately 4km north of the city centre, and adjoining the northern side of the suburbs of Hollyhill and Knocknaheeny. The lands comprise c. 31ha over a series of fields in agricultural use to the north and northeast of the Apple Headquarters. Each field is divided by mature hedgerows and dense vegetation.

2.2 Nash's Boreen Amenity Walkway runs through the lands towards Fairhill. To the east, further agricultural land along with higher density established residential development exists, and to the south are O'Neill Park, home of Grattan United soccer club, and the Apple Headquarters facility.

2.3 The lands slope gradually, falling towards Nash's Boreen, and on towards Killeen's Road at their northern end. The subject lands are serviced by the Lower Kilmore Road and David McCarthy Road from the southeast and Tadgh Barry Road from the southwest. Both roads form a ring road around the current Apple Plant where the junction to Nash's Boreen exists.

2.4 Nash's Boreen is a narrow laneway that runs through the subject lands. The laneway proceeds in an easterly direction towards Fairhill.

2.5 There are no known archaeological monuments on the lands. The lands do not have any national monument designations or contain any structures which have a protected status.

2.6 There are serious issues with trespass on these lands, more specifically trespass from horses, often giving rise to serious welfare issues. Previously, under 'Operation Capall', approximately hundred horses were impounded along with numerous dead horse carcasses collected. In addition, the lands, given the lack of surveillance and their secluded nature, are subject to anti-social behaviour, including the burning of cars.



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



Plate 1 – Nash's Boreen Amenity Walk to west of lands



Plate 2: Nash's Boreen Amenity Walk on northern boundary



Plate 3 – Evidence of Dumping at Nash's Boreen



Plate 4 – Northwest corner facing southeast



Plate 5 – Subject lands facing south



Plate 6 – Northeast corner of subject lands on Nash's Boreen



Plate 7- Burnt out vehicles within subject lands



Plate 8 – Further evidence of dumping



**Plate 9 – Burnt out vehicle on Nash's Boreen
on 3rd October 2021**



Plate 10 – Dumping within subject lands

3.0 PLANNING POLICY PROVISIONS

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

National Planning Framework (2018)

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

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

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

3.5 A key future growth enabler for Cork outlined within the NPF includes progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors.

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

3.7 **National Policy Objective (NPO) 1a** is aimed at ensuring that the projected level of population and employment growth in the Eastern and Midland Regional Assembly area (which contains the Greater Dublin Area) will be at least matched by that of the rest of the country.

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

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

3.10 Similarly, **National Policy Objective 3b** means that at least half (50%) of all new homes to be developed in Cork City and its suburbs should be delivered within the built-up footprint of the city and its suburbs.

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

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

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

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

3.14 **NPO 11** is as follows:

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

3.15 **NPO 32** is as follows:

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

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

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

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

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

3.19 **RPO 151b** is as follows:

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

Cork Metropolitan Area Strategic Plan

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

3.21 The Cork MASP includes the following strategic goals:

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

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

3.23 The MASP states that the:

Distribution of population and employment growth in the metropolitan area must align with public transport investment, and focus on regeneration, consolidation and infrastructure led growth of the city and suburbs, existing hierarchy of metropolitan towns and the strategic employment locations.

Cork Metropolitan Area Transport Strategy (2020)

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

3.25 As part of the Cork Metropolitan Area Strategic Plan (MASP), the Cork Northern Distributor Road is identified as a transport investment objective that will deliver a multi-modal orbital public transport route, accessing planned development lands, connecting to radial distributor roads and providing connectivity at its western end to join the existing N22.

3.26 The Northern Distributor Road is one of a limited number of new road-based projects proposed by CMATS. It comprises a new east-west link on the northern side of Cork City to be delivered in the short medium term to facilitate orbital bus and active travel movements and to reduce travel through the city centre and N40 South Ring Road by HGVs and private vehicles.

3.27 This road is distinct from the North Ring Road and is to cater for access to planned development lands, provide walking and cycling linkages, access to radial public transport routes, orbital public transport

provision, and the removal of some strategic traffic from Cork City Centre. It is identified as a 'critical enabler' for CMATS as it:

- *Creates opportunities for sustainable development of existing land banks in the Northern Cork Metropolitan area including Monard SDZ and the Ballyvolane Urban Expansion Area;*
- *Facilitates the rollout of sustainable transport measures including public transport services for the North Cork Metropolitan City area;*
- *Facilitates the introduction of a HGV ban within the City Centre;*
- *Serves the requirements of local traffic demand in the northern CMA: and*
- *Allows for the downgrading of national routes entering Cork City, which can therefore allow for the prioritisation of sustainable modes on these routes.*

3.28 Importantly, it will provide connectivity between Cork's Northside and key destinations in the city including CUH, CIT, Blackpool, and Tivoli Docks.

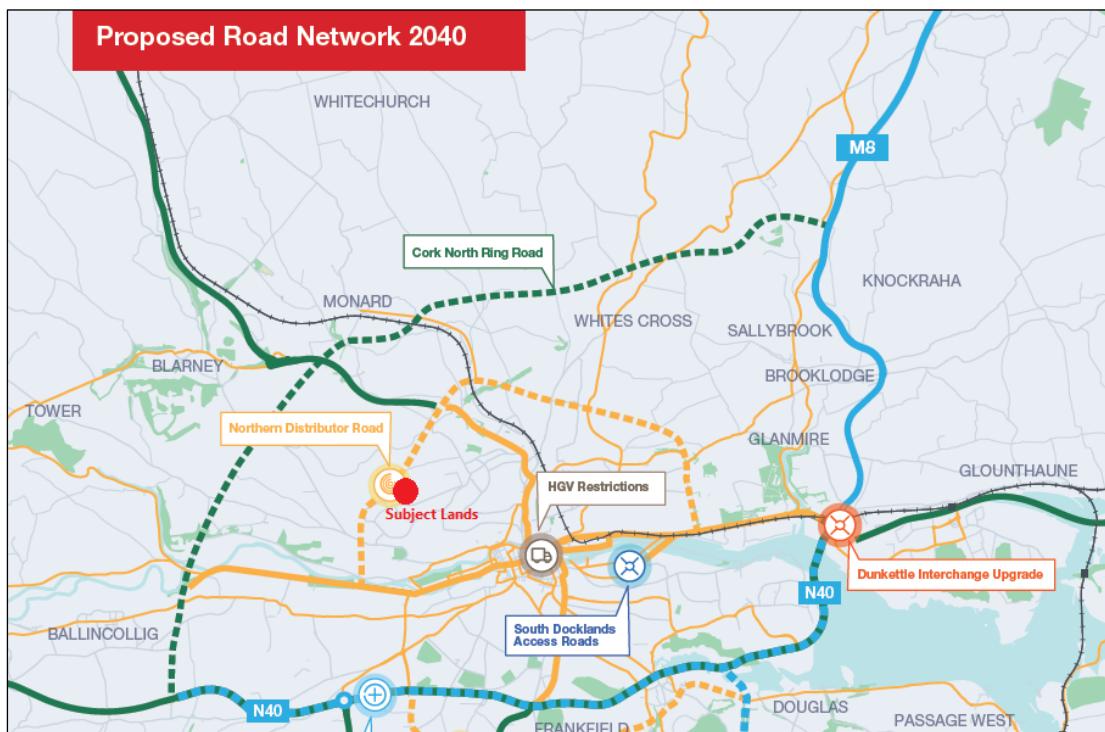


Figure 2: Subject Lands in Context of Proposed Northern Distributor Road

Cork 2050

3.29 This was a joint initiative between Cork County and Cork City Council as a submission to the National Planning Framework. It is premised on an evidence based strategic approach which aims to create the circumstances to deliver additional jobs and facilitate population growth for the whole of Cork as predicted in the Ireland 2040 initiative:

Cork is today and will be in 2050 the national asset best placed to deliver for Ireland...At the end of this, we want this City and this county to be a real alternative to Dublin. Cork essentially hasn't

changed much over the last 20 years, but over the next 20 years it will look dramatically different from what it looks like now with 25% of the City's footprint still to be built.

3.30 The Strategy sets out Phase One (2017-2028) of its integration of land use and infrastructure investment programme. It advises that the northern environs of the city in particular has significant potential for future quality residential development, serving to rebalance the city.

Cork County Development Plan 2014

3.31 Until Cork City Council has completed its development plan review, the relevant statutory development plan for the subject lands is the Cork County Development Plan 2014 (CDP).

3.32 The North City Environs is identified as being part of the Cork City Gateway in CDP **Objective CS 3-1: Network of Settlements**, the strategic aim for which is:

Growth in population and employment so that the Cork Gateway can compete effectively for investment and jobs. Develop to complement & consolidate the development of the city as a whole and providing enhanced potential to rebalance the City through new development in the north.

3.33 **Objective CS 4-1** of the CDP outlines the strategic planning aims for the plan period and items "G" and "N" have a particular resonance for the development of the subject lands:

CS 4-1-g

Develop the Cork City Environs so that they complement the City as a whole. In the south, priority should be given to consolidating the rapid growth that has occurred in recent years by the provision of services, social infrastructure and recreation facilities to meet the needs of the population. The North Environs will play a major role in the rebalancing of the City in terms of future population and employment growth;

CS 4-1-n

In the Cork Gateway, development to provide the homes and jobs that are necessary to serve the planned population will be prioritised in the following locations, Carrigaline (Shannon Park), Midleton (Waterock) and Carrigtwohill (North of the Railway), Ballincollig (Maglin), North Environs (Ballyvolane), Glanmire (Dunkettle), Blarney (Stoneview), Monard and Cobh. Details of the proposed development will be set out in Master Plan studies and Local Area Plans as appropriate.

Cobh Municipal District Local Area Plan 2017

3.34 Until Cork City Council has completed its development plan review, the relevant statutory local area plan for the subject lands is the Cobh Municipal District Local Area Plan 2017 (LAP).

3.35 Under the LAP, as part of the Cork City North Environs the subject lands are zoned as follows:

- **NE-O-1**

Open space for public recreation including the provision of playing pitches, amenity walks, pitch and putt course, children's playground, open parkland areas, areas of urban forestry and built leisure facilities subject to appropriate scaling and siting.

3.36 In addition, a roads zoning objective applies to Nash's Boreen on the subject lands which is envisaged would form a natural development boundary from the subject lands to the surrounding city hinterland

- **NE-U-09**

Completion of pedestrian walk with access through proposed north western Regional Park and connection to Glenamought River Valley

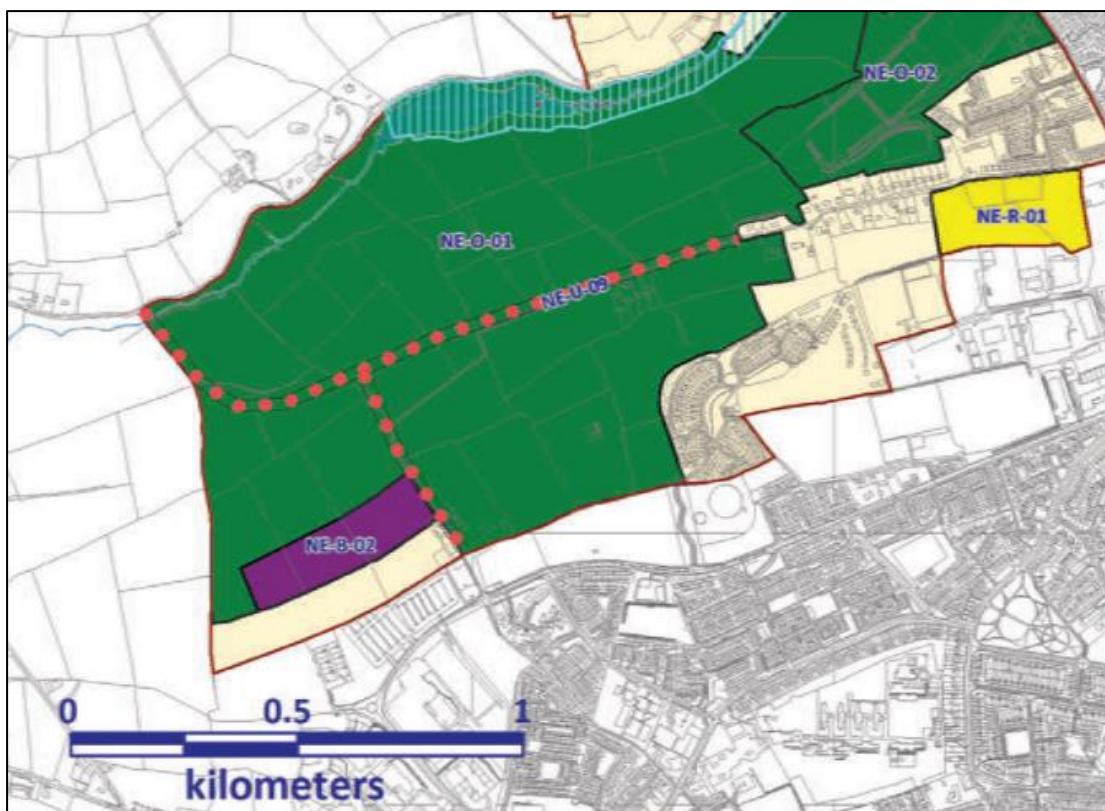


Figure 3. Extract from Cork City North Environs 1 map of the LAP (Source: Cobh Municipal District Local Area Plan 2017; Annotated by Coakley O'Neill Town Planning Ltd., 2021).

3.37 Cork County Council's vision for the Cork City Northern Environs, as set out in paragraph 3.4.1 of the LAP, is as follows:

The vision for Cork City North Environs to 2020 is to re-invigorate the northern suburbs of the city, within the County area, as a significant location for future residential development. This will require a planned major mixed-use development at Ballyvolane coordinated with substantial infrastructure investment, the provision of enhanced community and recreational facilities and public transport accessibility, with the aim of rebalancing the provision of services more equitably throughout the city.

Cork City Draft Development Plan 2022–2028

3.38 Under the Cork City Draft Development Plan 2022-2028 the subject lands are proposed to be zoned **ZO 16 Public Open Space**, with the zoning objective being as follows:

To protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas, and amenity facilities.



Figure 4. Excerpt from Map 9 of the Cork City Draft Development Plan 2022-2028. (Annotated by Coakley O'Neill Town Planning Ltd., 2021).

3.39 **Objective ZO 16.1** of the Draft Plan highlights that:

This zone includes strategic public open space and amenity lands. Lands in this zone comprise a wide range of passive and active recreational and amenity resources for the community including parks, sport and water sports, leisure facilities, amenity areas and natural areas including ecological networks, woodlands, and other habitats. The primary purpose of this zone is to preserve all land in this zone for open space and amenity use.

3.40 Section 3.4.59 of the 2017 LAP recognises the adequate amount of open space in the North Environs zoned as such but also recognises these areas as being currently unusable.

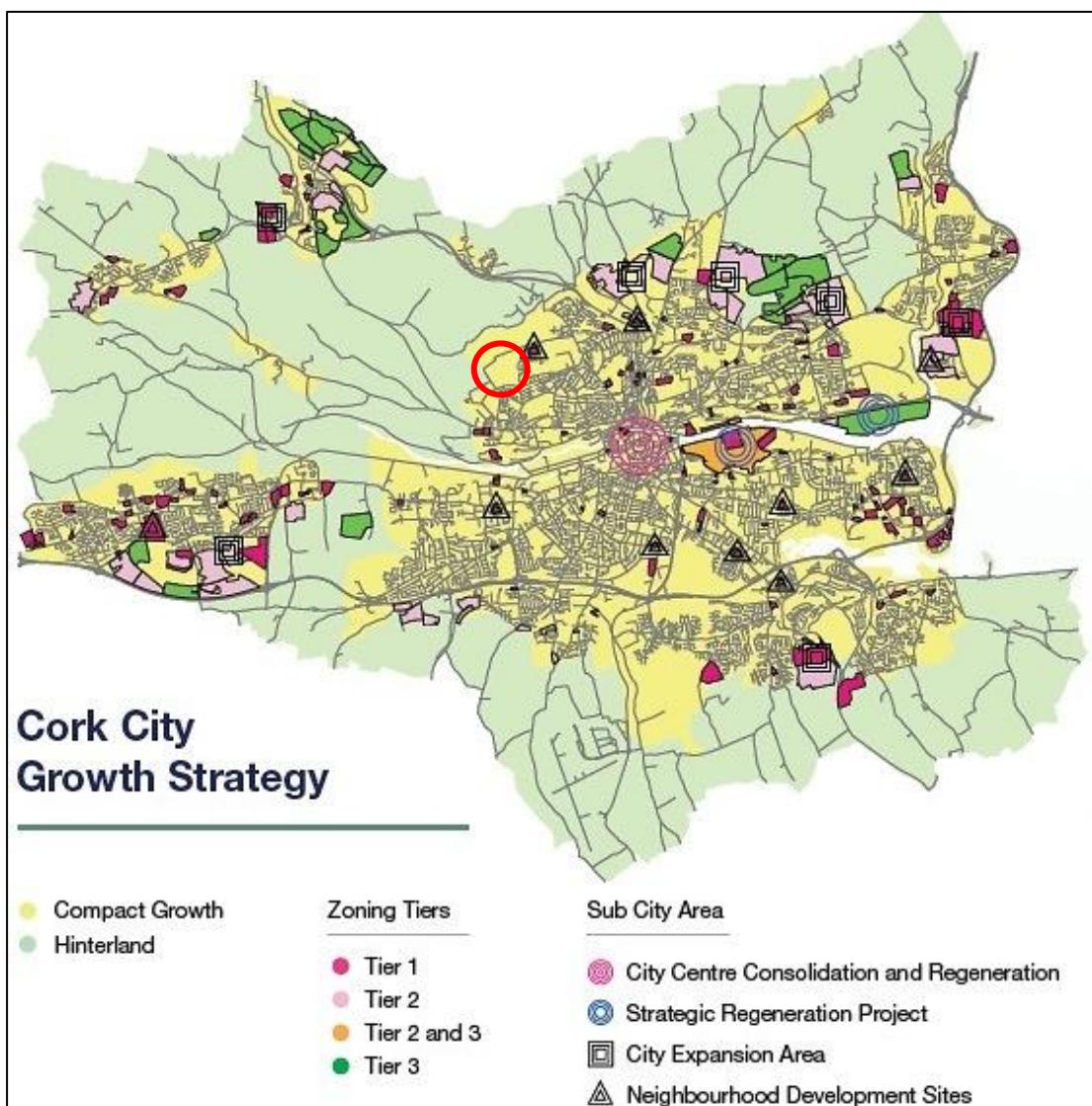


Figure 5. Growth Strategy Map 2022-2028 with location of subject lands indicated in red. (Source: Cork City Draft Development Plan 2022-2029; Annotated by Coakley O'Neill Town Planning Ltd., 2021).

3.41 While the route of the Northern Distributor Road is currently being considered, the Draft Development Plan states that the Northern Distributor Road is regarded, under CMATS, to be a “critical enabler” for creating opportunities for the sustainable development of existing land banks in the northern Cork Metropolitan Area.

4.0 PLANNING HISTORIES

4.1 Being greenfield, the subject lands have no planning history.

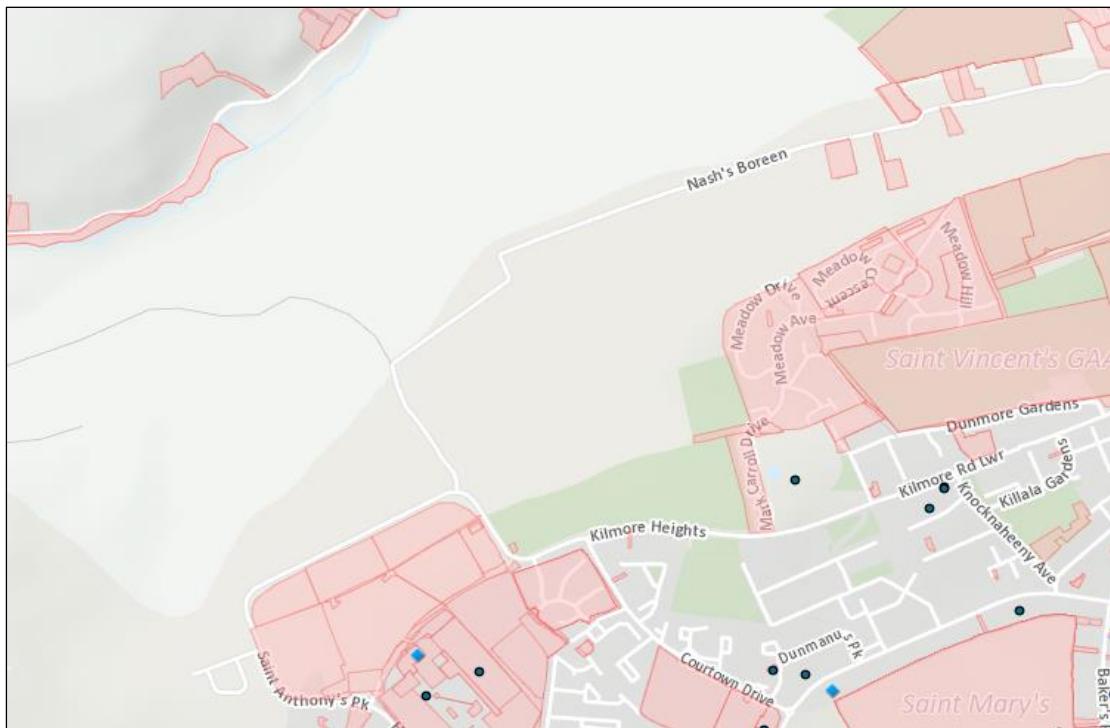


Figure 6. Planning Sites in Area (Annotated by Coakley O'Neill Town Planning Ltd., 2021).

4.2 There are several applications pertaining to the surrounding land in the area. These include:

- **Application Register Reference: 045054:** Permission granted for demolition of dwelling house and construction of 271 residential unit, creche and neighbourhood centre at Knocknacullen East, Gurranabraher.
- **Application Register Reference: 1938630** Permission granted for the construction of 17 no. Affordable Residential Units comprising: 1 two bed 2 story house, 9 three bed 2 story houses and 1 four bed 3 story arranged in a terrace, and to the East, 6 two bed apartments in a three storey block including balconies at first floor and second floor level facing West. The proposal includes 19no car parking spaces (8no on-street and 11no off-street) 6no cycling bars, ancillary site works 9including individual refuse storage areas) and landscaping, all on lands totalling 0.2219Ha forming part of the Cork City Northwest Quarter Regeneration. At: The site is bounded by Dunmore Gardens to the North, Kilmore Road Lower to the South, (all part of the Cork City Northwest Quarter Regeneration Area) and Existing Houses to the West. By O Cualainn Co Housing Alliance
- **Application Register Reference: 1737671:** Permission granted for the construction of 22 no. residential units (8 no. ground floor apartments with 8 no. two storey duplex apartments units over 6 no. semi-detached dwelling houses) bin storage units new site entrance

4.3 Apple Operations Europe have a number of successful planning applications pertaining to their own lands.

5.0 SUBMISSION

Introduction

5.1 This submission requests the rezoning of c.15ha of lands at Hollyhill from **Public Open Space** to a **ZO 02 Residential** zoning objective.

5.2 It is evident that to achieve the country's sustainable development goals, in accordance with national strategies, and population growth, new residential development should be targeted within our cities, towns and villages. Yet, the sustainable growth of Cork City over the previous City Development Plan periods has largely failed to materialise with respect to population growth and new residential development targets. Adopting the same policy approach will not address this.

5.3 We submit that appropriate areas contiguous to the built-up city, such as the lands identified in this submission, should be considered for their development capacity and their potential to contribute to the sustainable development of the city.

5.4 One such opportunity arises in the northwest of the city, in Hollyhill adjoining Apple, the largest employer in the southern region, and adjacent the proposed Northern Distributor Road, which is to be delivered in the short term and is acknowledged as a critical enabler to the development of a sustainable transport network for the city.

5.5 We thus ask the Planning Authority, in the finalisation of their new Development Plan for the City, to assess the merits of further development in this part of the City, affirm the worth of the subject lands for development and rezone same with a residential development objective.

5.6 The merits of this from a strategic planning and housing need perspective are discussed in detail below.

Strategic Urban Development

5.7 There is an undeniable risk that a large majority of future residential development over the lifetime of this new Development Plan will be on the southside of the city, further exacerbating the city's existing spatial imbalance.

5.8 Partly to blame for this is that the prioritisation of development on the northside and rebalancing the city has almost disappeared from the strategic planning agenda in Cork, to the extent that the Draft Development Plan makes no mention whatsoever of the social and economic imbalance clearly evident in the city. This trend has been evident for a number of years now.

5.9 For the past 40 years, the development plans of both Cork City and County Councils have been made within the strategic planning policy framework established by non-statutory strategic plans for the city region: The Land Use and Transportation Study, (LUTS) 1978; the LUTS Review 1992, the Cork Area Strategic Plan (CASP), 2001 and the CASP Update 2008. The City and County Development Plans have also been informed by the Southwest Regional Planning Guidelines from 2004 and 2010. The most recent

strategic planning vision for the Cork City region was set out in the Councils' submission to the Government's National Planning Framework. This submission was entitled 'Cork 2050' and set out a planning strategy for the city region for the next 30 years.

- 5.10 A cursory review highlights a marked contrast in how the development of the northside is addressed between this latest strategy and those that have gone before.
- 5.11 The Cork LUTS was published in 1978 and identified the need to regenerate the city as a result of the displacement of population and employment to county areas. A review of the LUTS was carried out in 1992 and identified the lack of development to the north and east of the River Lee and Harbour, as a result of economic difficulties of the 1980s, which disproportionately affected these areas. As a result, Initiative 2 of this Review was the: *Turning Around the Northside/ East Harbour Area*.
- 5.12 CASP concluded in 2001 that the northside of Cork City had one of the most significant concentrations of social and economic deprivation outside Dublin. It further acknowledged that past development had not been evenly spread, especially around Cork City. The great majority of development had been to the west and to the south of the city and little modern economic development had yet occurred in the northside which had never fully recovered from major factory closures some 20 years ago. The area contained a high concentration of social housing and remained one of the few socially deprived parts of the CASP Area.
- 5.13 In response CASP placed the promotion of social inclusion as a key objective and sought to redress the existing spatial social and economic imbalances in the city region and justify the provision and location of new development and infrastructure in a sustainable way. Rebalancing of the city socially, economically, and spatially by providing for growth on its northside was thus a key strategic objective of the Plan.
- 5.14 The CASP Review in 2008 again highlighted the lack of development on the northside of the city, noting that new strategic employment locations had developed on the southside of the city and on the northside the potential of Kilbarry as a strategic employment location had not been realised partly due to a lack of provision of road infrastructure. Unemployment was still concentrated in the north of the city and therefore, retaining the objective of rebalancing development across the city, the Plan's spatial strategy involved concentrating a significant proportion of population growth in areas such as the Docklands and the North City Environs.
- 5.15 Cork 2050, the joint submission to the National Planning Framework by Cork City and County Councils makes a single passing reference to the rebalancing of development across the city.
- 5.16 This follows through to the recently published Draft Development Plan, which makes no reference to the need to rebalance the spatial and economic structure of the city.
- 5.17 So, it is evident that a focus on the northside and addressing the social and economic imbalance of Cork City has diminished over the past 20 years, from being a core objective of earlier strategic plans to the extent that it is hardly mentioned in the last strategic policy documents for the city region. This, we submit,

is a glaring omission. It is further submitted that development on the northside and rebalancing the city must be placed back at the heart of the strategic planning agenda.

5.18 Below we present a sketch proposal identifying opportunities for development on the northside of the city, which includes an 'Urban Expansion Area' at Hollyhill.

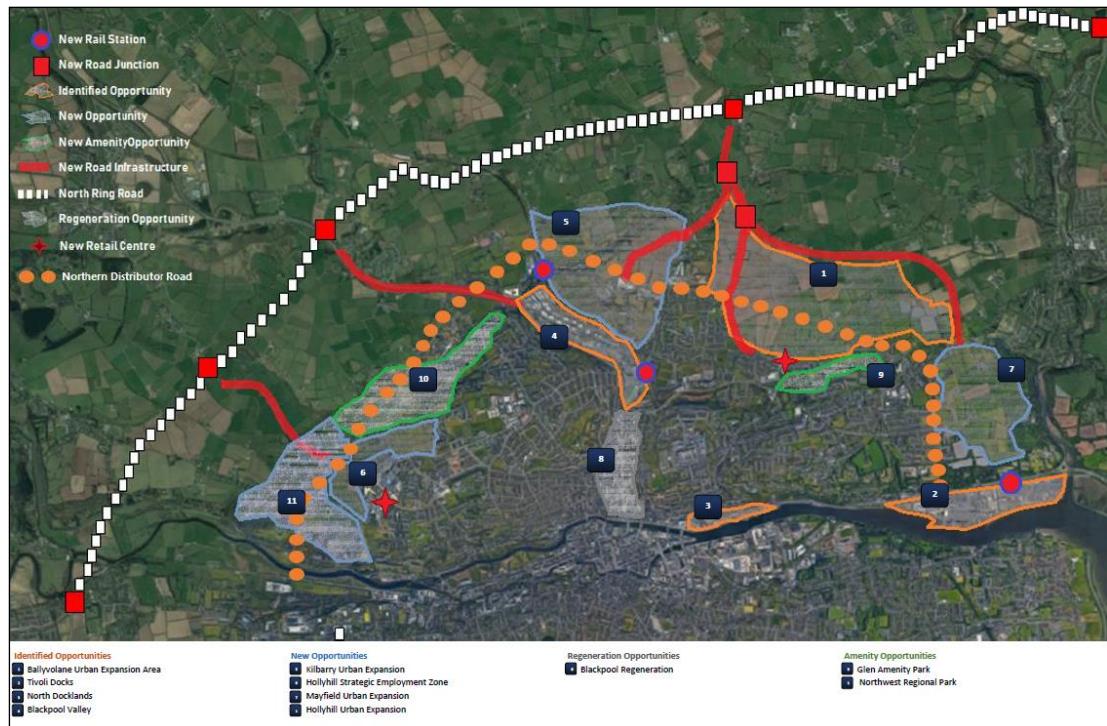


Figure 7: Northside Opportunities

5.19 Our client's lands are located on the proposed Northern Distributor Road, one of the key public transport initiatives on the northside. This presents a significant change to their development context.



Figure 8: Subject Site in Context of Proposed Northern Distributor Road

Housing Demand and Need

5.20 In preparation for the National Planning Framework, an Issues and Choices Paper noted:

- By 2040 the population of Ireland is expected to increase by more than 750,000 people to 5.6m (from 4.75m 2016),
- The number of people over the age of 65 will double to well over one million;
- The average number of people per household is to likely to reduce to around 2 persons per dwelling (currently 2.7);
- There will be a need for an absolute minimum of 500,000 new homes at least 25,000 new homes per year;
- There will likely be more than 2.5million people at work (exceeding the previous Q1 2008 maximum of 2.2million).

5.21 In terms of population growth, the NPF is predicated on an estimated population increase of c. 1million people to 2040. Of that, National Policy Objective 1b estimates 340,000-380,000 additional people, i.e. a population of almost 2 million, in the Southern Region, of which Cork forms part.

5.22 In terms of housing these new populations, the plan seeks to channel future growth in a sustainable manner targeting compact growth and 40% of Ireland's housing within existing urban settlements. National Policy Objective 3b seeks to 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.

5.23 In fact, with regard to Table 2.1 of the NPF, of the regional cities outside Dublin, Cork is expected to grow the most, by up to 125,000 people to 2040. The pattern of targeted population growth is presented in table 4.1 of the NPF as shown below:

Table 1: Table 4.1 of NPF: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040		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

5.24 The implication for Cork would result in significantly higher levels of population growth forecast for the city and suburbs. To accommodate this anticipated increase and to achieve the compact city goals the NPF emphasises the uptake of infill and brownfield development and targeting the potential of sites in key locations that are accessible by public transport, serviced and have access to established community facilities.

5.25 The plan emphasises the need to support regional centres and to encourage development in existing urban centres to meet rising housing demand.

Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people's needs for well-located and affordable housing, with increasing demand to cater for one- and two-person households. Within this figure, there is a wide range of differing housing needs that will be required to be met.

5.26 These housing growth targets for Cork City established in national and regional planning policy guidance are highly ambitious.

5.27 Among the chief sources for evidence and trends when looking at housing supply and demand are the datasets available from the Central Statistics Office (CSO) and the Department of Housing Planning and Local Government, as well as those compiled by the Local Authorities. Also, of assistance recent publications addressing housing demand and supply both national and within the Cork region specifically.

5.28 Launched on 2nd September 2021, the *Housing for All – A new Housing Plan for Ireland* document is the Government's revised policy and investment plan to address the chronic housing crisis which has affected the country since 2014. The plan states the following:

Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the National Planning Framework. These homes need to be affordable, built in the right place, to the right standard and in support of climate action. They need to satisfy demand for housing across four tenures – affordable, social, private rental and private ownership. They need to be advanced through the planning process and be built within the context of specific development targets for the five cities and major towns, and the complementary objectives of the Town Centre First policy and rural housing.

5.29 Despite recent uptake in supply, across all indicators and criteria and by any measure, the level of housing supply in Cork City is still dramatically low; to the extent that there is no prospect whatsoever the city can meet either the current statutory Development Plan targets for new house completions over the period of the Plan or the ambitions of the NPF for Cork. In all, there can be no doubt as to the urgent need for new residential accommodation within Cork City.

5.30 A comparison of the current levels of completions with long run trends indicates significant constraints to supply in the Cork City area, which include a lack of suitable development sites, infrastructural deficits, and higher development costs.

5.31 While the 2016 Census revealed an increase in the city's population to 125,657, past and current figures on planning permissions and house completions indicate trends still significantly behind stated targets.

5.32 The number of dwellings granted planning permission over the period of the 2015 City Development Plan were below target. To put this in context of the Government and Council commitments to the creation of

a compact city, over the past 4 years, the number of one-off houses granted permissions in Cork County exceeds all combined residential units granted in the city. In terms of house completions, similar trends are revealed.

5.33 The scale of the issue and the lack of supply within the city is affecting the city's potential growth as a second-tier city, highlighted by the 2018 Cork Chamber report ***Rebalancing the Irish Housing Market***. The availability of housing has now emerged as a critical issue for the successful and sustainable economic development of Cork and will adversely affect the region's ability to attract inward invest.

5.34 Based on trends over the past 20 years, nothing less than a remarkable acceleration in the level of housing development is required to put the city on course to even come close to achieving these targets.

5.35 It is in this context that this submission must be considered and assessed.

Development Merits of the Subject Lands

5.36 The subject lands have a number of sustainable development attributes that render them suitable for residential development.

- The lands are located within a strategic development area on the northside of the city and are located adjoining the city development boundary.
- Development management matters can be successfully addressed, amenities of existing uses and properties can be protected, and visual amenities would not be unduly impacted.
- The subject lands are available for development immediately. All necessary services are available on the adjoining public road. They can be easily accessed.
- The lands are located in close proximity to a public transport corridor and on the proposed Northern Distributor Road which is to be a key orbital public transport corridor. They can be developed without significant investment in existing road infrastructure. In relation to traffic, it is notable that the subject lands incorporate a substantial roadside boundary, providing ample flexibility to secure appropriate sightlines.
- Part of the lands were previously zoned for residential development until 2017. They formed part of the residential zoning objective R-01 in the 2011 Blarney Local Area Plan. The R-01 objective, illustrated below, was as follows:

Medium B residential development. The reserved lands on this site shall be reserved for affordable housing only.

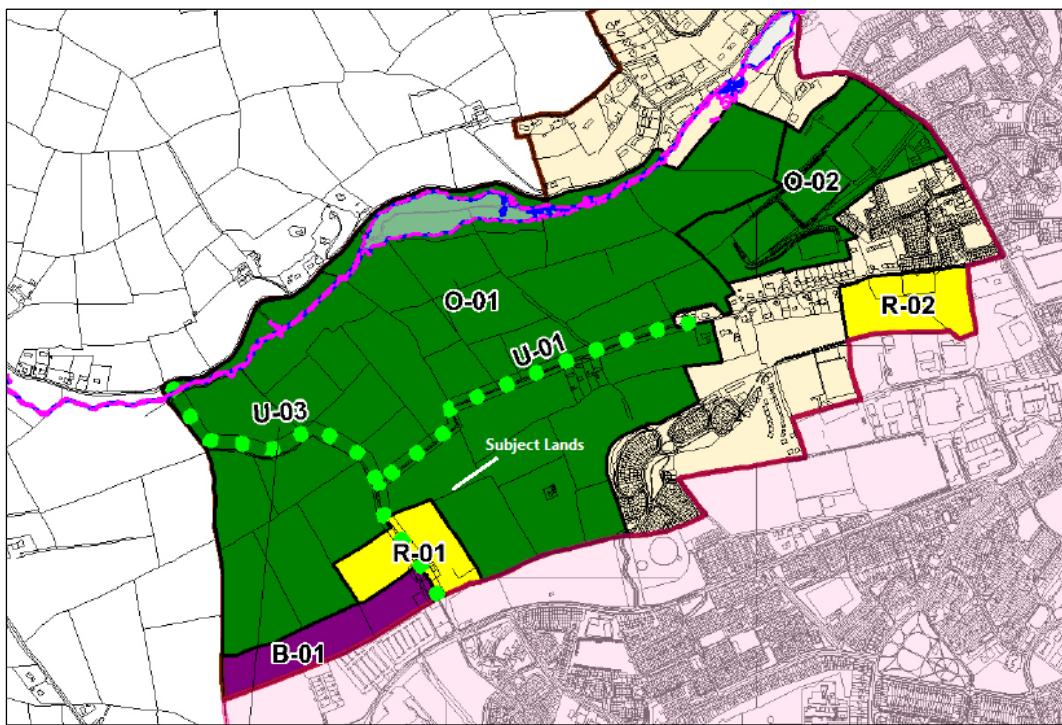


Figure 9: Previous zoning of Lands until 2017

- As set out above, the lands' development for residential uses will help meet an identified and urgent need for housing.
- There are no natural heritage designations on the subject lands, and they are not located on a designated scenic route. There are no protected structures on, or immediately adjacent, the site. There are no national monument designations on the subject lands.
- The lands proposed are positioned directly adjoining one of the largest and most important employers in the city region, Apple, and is also within a short commute of large employers at Kilbarry and Blackpool and thus present the potential of sustainable commuting patterns.
- Nash's Boreen represents a natural development boundary between the built up area of Cork City and the surrounding City Hinterland.
- Residential development along the roadway would provide for surveillance and activity in the proposed regional park at this location. In addition, the Nash's Boreen Amenity Walk can be upgraded to make it a more accessible and welcoming public amenity.
- Many areas on the subject lands are subject to the dumping of large volumes of rubbish, including the boundary on Nash's Boreen. Residential development would bring the surveillance and activity to tackle this.

- The subject lands are currently located within an area that is marginally disadvantaged and experiences deprivation in terms of demographic profile, social class composition and the labour market situation. Their development can contribute to addressing this.
- It is submitted that a change of zoning to allow for residential forms of development with a **ZO 02 zoning designation** will help in delivering much needed homes to people but also serve as a catalyst for the general improvement and upkeep of the proposed regional amenity park which surrounds the subject lands. This proposal is illustrated below



Figure 10 – Proposed Zoning for Subject Lands – “ZO 02 – New Residential Neighbourhoods”

6.0 CONCLUSION

- 6.1 Our client very much welcomes the publication of a new Draft Cork City Development Plan, and it is hoped that the points raised will be of benefit to the Council in the preparation of the new plan.
- 6.2 The consideration of the merits of whether to amend the zoning of the lands should first be undertaken within their wider planning policy context. This context is, in our view, extremely favourable given the strategic national and regional planning objectives for the development of Metropolitan Cork and the need for development on the northside of the city.
- 6.3 The rezoning suggested will help realise the early development of the lands for residential uses and thus help meet identified housing targets set out for the city of Cork at national and regional level.
- 6.4 The subject lands are located in Hollyhill directly adjoining one of the largest employers in the city region. The wider location has suffered from social and economic disadvantage and would benefit from new development. The proposed zoning amendment would reflect previous zoning objectives for the lands and could help provide surveillance and activity for the proposed regional park in the northwest of the city.
- 6.5 On these grounds, we ask that the City Council give favourable consideration to the rezoning request made herein.