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4<sup>th</sup> October 2021

## **RE: Submission to the Cork City Draft Development Plan 2022-2028**

The Land Development Agency (LDA) welcomes the opportunity to make a submission in respect of the Cork City Draft Development Plan 2022-2028 (Draft Development Plan).

The LDA is a commercial state-sponsored body that has been created to activate and coordinate public and other relevant land with a focus on the provision of housing and compact urban development. The LDA also has a significant role to play in the regeneration of relevant public land together with the deliver and management of new housing on relevant land. In this context, a full review of the Draft Development Plan has been completed to ensure the views and objectives of the LDA as a key stakeholder within Cork are represented.

This submission has a focus on the aims of the LDA in relation to our role in supporting implementation of the National Planning Framework and delivering compact residential development and urban regeneration and optimising certain relevant public lands. While the LDA is currently progressing work to identify and assess relevant public lands in line with our role and remit under the LDA Act 2021, there are a number of key sites which have already been identified by the LDA for development within the lifetime of the Draft Development Plan. These sites include Land adjacent to ESB, Wilton, Lands at Cork Docklands and Port and Lands at Kilbarry.

This submission provides views on the overall plan as set out and also includes site-specific comments in relation to the sites outlined above. In addition to the sites outlined above, there is also a further large land bank of state land within Cork City, and the LDA is currently progressing work to identify and assess relevant public lands for reporting to the Government. It is recommended that the role and remit of the LDA should be considered more broadly in relation to the development of residential led sustainable development through the lifetime of the proposed Development Plan and beyond.

This submission provides commentary on specific policies and objectives as relevant which include the following thematic sections:

1. Role of LDA;
2. Strategic Context;
3. Settlement and Housing Strategy;
4. Building Height;
5. Transport;
6. Site Specific: LDA Cork Development & Regeneration Sites; and
7. Summary.



## 1. Role of LDA

The Draft Development Plan references the LDA within the supporting text on delivering the Core Strategy noting that

*“the resourcing and delivery of financing structures will be critical to unlocking the regeneration of strategic sites within Cork City. Given the complex nature of developing urban sites including the mix of land ownerships involved, alternative sources of financing and innovative funding mechanisms will be required. The need to increase the supply of affordable housing and affordable cost-rental further increases the challenges in designing appropriate financing mechanisms”.*

The LDA is noted as being a key partner in delivering financing structures to unlock these regeneration sites specifically noting that *“having regard to these challenges, Cork City Council will seek to enable suitable partnerships that harness financial expertise that exists across a range of publicly supported institutions such as the Land Development Agency (LDA)”.*

The role of the LDA, as a key agency to optimise state land to deliver more affordable housing and work with local authorities and key stakeholders to drive urban regeneration should be recognised within a clear policy objective. Whilst the current reference to the LDA is noted, the Draft Development Plan should acknowledge the broader role of the LDA in progressing plans for regeneration and delivering development within Cork City and recognise the LDA as a key stakeholder in achieving the policy objectives set out within the Core Strategy. The recently published Housing for All by the Minister for DHLGH has indicated the transfer of significant state assets in Cork City to the LDA and in light of this, including Cork Docklands and Cork Port. It is therefore recommended that the Draft Development Plan should include specific reference to the role and mandate of the LDA in progressing plans and delivery of housing and regeneration. It is therefore respectfully requested that the following policy objective should be inserted within the Draft Development Plan.

### *Objective 3.35*

#### *Role of Land Development Agency*

*The Land Development Agency (LDA) has a focus on managing the State’s own lands to develop new homes and regenerate under-utilised sites. The LDA will assemble strategic land banks from a mix of public and private owned lands, making these available for housing in a controlled manner, which will bring essential long-term stability to the Irish housing market”.*

*Cork City Council recognises and supports the LDA’s key role in optimising relevant state lands and progressing plans for regeneration and delivery of compact urban development.*

*The LDA has a key role to play in the master planning, active land management and delivery of strategically important development and regeneration areas in Cork City which will support the Council’s objective for compact and sustainable growth.*

*Cork City Council will work with and support the LDA in the planning, co-ordination, and development of the large strategic state-owned assets in order to achieve compact, sustainable growth and the economic and physical regeneration of these strategic areas.*

## 2. Strategic Context

The Draft Development Plan sets out the strategic vision for Cork City, *“To increase the population of Cork City in line with national and regional growth targets; To develop Cork City as an international compact, sustainable city of scale and the regional driver of growth by creating sustainable, liveable, integrated communities and neighbourhoods for all; To plan to deliver at least half (50%) of all new homes in the existing built-up footprint of the City; To support the delivery of the Core Strategy by: Applying a tiered approach to land use zoning; and by ensuring that new homes are provided at appropriate densities in brownfield, infill and in greenfield locations within and contiguous to existing City footprint”*.

In general terms the Strategic Context of the Draft Development Plan is supported, and the evidence bases which include the NPF, RSES and regional and local studies are acknowledged. The key elements of the Plan in the context of the LDA are discussed in further detail below. The strategic context of the Plan is noted as being a plan which identifies *“Suitable locations for development and growth are identified, with an emphasis on achieving sustainable development, compact liveable growth and enhancing the quality of life in the city”*.

In terms of the key strategic objectives of the Draft Development Plan in the context of the LDA and its aims, the principle of each objective is welcomed and supported, and particularly in relation to Objectives S01 and the following key objectives related to the role of the LDA are:

- S02 - Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods.
- S03 - Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and smart mobility, accessible for all.
- S09 - Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where placemaking is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects the character of the city and neighbourhood.

### 2.1. Core Strategy

As noted at Section 2.0, the Draft Development Plan has been prepared in line with national, regional and local policy frameworks. The National Planning Framework (NPF) recognises the growth of Cork and its importance by *“setting out bold new growth targets reflecting the city’s critical role in enhancing Ireland’s metropolitan profile”*. The NPF targets *“60% population growth for Cork City by 2040. This will result in an additional 125,000 people living in the City within 20 years”*. The Core Strategy is based on the population growth figures set out within the NPF. Cork City has significant potential to accommodate the ambitious population growth of circa 49,580 over the Draft Development Plan period and the Core Strategy is well placed to support that aim with a focus on compact and sustainable growth and regeneration which is welcome by the LDA.



A major focus for Cork City will be on regeneration and optimising relevant underutilised brownfield lands and the LDA has a key role in working with the City Council to support with putting in place a framework and implementation plan to support key objectives of the Core Strategy.

In order to deliver the compact liveable growth objective as part of the Core Strategy a number of approaches have been identified. These include the “15-minute City” and “walkable neighbourhoods” both of which are supported in principle by the LDA. However, key to delivering the aims of the Core Strategy and those of the LDA is the as yet unpublished City Capacity Study which fully assesses the capacity for future development within underutilized zoned lands, of which the LDA are a key stakeholder. We note the importance of the City Capacity Study in informing the Core Strategy and in this regard, the Study should be made publicly available to provide interested parties with a better understanding of the data informing the Core Strategy including housing delivery assumptions for identified sites.

The Draft Development Plan confirms the City Capacity Study assesses the capacity of Cork City for future development within underutilized zoned lands, which includes both greenfield and brownfield land. The principles of the City Capacity Study are supported by the LDA. However, the Draft Development Plan notes that *“Some brownfield sites with existing active uses, such as state or institutional uses, were excluded. Their delivery timeframe cannot be estimated as they may or may not change use over time. These will be treated as windfall sites, if or when they become available. Such sites will require careful planning and design, including detailed framework plans that ensure best practice regeneration based on the character and nature of their existing urban environments”*.

The difficulty of including such sites when there is no certainty yet on timing is recognised. However, this is an area where a close partnership with the LDA can be beneficial not only in including potentially relevant state-lands, but also ensuring the development of relevant state land can come forward in a strategic way rather than simply as more “windfall sites” which are considered and planned for at the earliest opportunity.

#### 2.1.1 Strategic and collaborative approach

The LDA supports a strategic and collaborative approach to unlocking the regenerative potential of the City, particularly in relation to planning for strategic areas of potential such as Cork Port and Cork Docklands which will have a transformative impact on the city into the future and deliver wider social and economic benefits. The LDA is well placed to progress plans working with the Council and other key stakeholders, particularly in the context of LDA’s remit in

- Coordinating appropriate State lands for regeneration and development, opening key sites which are not being used effectively for housing delivery and
- Driving Strategic Land Assembly working with both public and private sector landowners to smooth out peaks and troughs of land supply, stabilising land values and delivering increased affordability.

The LDA has access to an initial tranche of state lands and is actively developing those sites, and as set out in the recently published Government’s (2021) *Housing for all A New Housing Plan for Ireland* the Government is providing access to a further tranche of lands which are appropriate for housing that have been drawn from across state bodies who understand the need to prioritise housing. The LDA is in many cases is engaging on these and is keen to ensure due consideration of the wider urban development context and the potential for synergies with the future infrastructure and public transport plans. In this regard, very significant regeneration areas of Cork are included such as Cork Docklands and lands in Cork Port as well as Kilbarry.



The LDA and Cork City Council are progressing plans for the establishment of a Cork Docklands Delivery Office which will be important to support with developing plans and unlocking the potential for the state and other lands interests.

The LDA is keen to work in partnership with the City Council to progress the development of framework and implementation plans for the strategic sites in line with the vision and objectives of the Draft Development Plan.

In line with the LDA's remit under the LDA Act 2021, the LDA will be preparing a report on relevant public lands for submission to the Minister for DHLGH within twelve months of the commencement of the relevant Section of the Act. This further strengthens the need for a recognised policy objective for the LDA as noted in section 2 above. The LDA would welcome engagement with the Council regarding the potential for certain relevant state lands in support of the overall Development Plan objectives.

Overall, the Core Strategy provides a strong basis to support future development and the compact liveable growth of Cork City and recognises the potential for unlocking key areas of brownfield or previously developed land to support the overall vision and objectives of the plan. The LDA is also working to identify relevant public lands with potential for future development or regeneration into the future and therefore, engagement with the Council in this regard should be promoted and acknowledged within the proposed policy objective and within the Core Strategy.



### 3. Settlement and Housing Strategy

The Draft Development Plan identifies the roles, key sites and key deliverables within the Core Strategy which will shape the approach to development within the lifetime of the Plan. The tiered approach to land-use zoning as set out within the NPF has informed the required level of land-use zoning for residential use in Cork City to meet the targets set out by the NPF within the lifetime of the Draft Development Plan.

This tiered approach identifies Tier 1 land which is zoned land which is serviced and Tier 2 land which is zoned land that is serviceable within the lifetime of the Draft Development Plan. The Draft Development Plan also identifies Tier 3 lands which are zoned but are considered unlikely to be serviced during the lifetime of the Draft Development Plan.

These principles are underpinned by a series of objectives which along with the above are supported by the LDA. Of note is Objective 2.19 which outlines the approach to “windfall sites”, of which lands relevant to the LDA are included as these are relevant state lands. As with the general objective regarding the role of the LDA above, we believe that an objective should be included which accounts for the likelihood of sites coming forward in the lifetime of the development plan. Therefore, we respectfully suggest the following strategic objective is included:

#### *Objective 2.xx*

#### *Delivery of Relevant State Land*

*Cork City Council, together with the LDA and relevant stakeholders, will support with recognising and enabling progress on planning for the development and renewal of certain relevant state-owned lands within Cork City as potential key deliverables to achieve NPF growth targets.*

The importance of compact growth is noted and welcomed with regard to the delivery of new homes within Cork City. In particular the LDA notes that “Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork”.

#### 3.1. Housing Mix & Tenure

The approach to housing mix and tenure is set out within the Cork County and Cork City Councils Draft Joint Housing Strategy (Housing Strategy) which is underpinned by the support of the Draft Development Plan. Within the Housing Strategy, the role of the LDA is noted in the delivery of social and affordable housing through regeneration. Overall, the policy objectives within the Housing Strategy are noted and welcomed.

Regarding housing mix, the Housing Strategy notes the requirement to facilitate a range of household sizes through the lifetime of the Draft Development Plan. This approach is welcomed but it is suggested that a degree of flexibility should be applied to ensure the strategy can adapt to changing social, demographic and market situation.

In terms of tenure, we note the objective of P05 which requires 10% of lands zoned for residential use or mixed-use development which includes residential use to be reserved for social housing. the LDA is supportive of this objective and notes that within the policy there is flexibility in this regard, which states that “Areas may be identified by the Cork County and Cork City Development Plans where this requirement will not apply or a lower percentage will apply, in order to counteract undue segregation in housing between persons of different social backgrounds and in accordance with the Planning and Development Act 2000 (as amended)”.





## 4. Development Management

### 4.1. Density & Building Height

In terms of density, the Draft Development Plan sets out building height and density at specific locations. The key locations and density and building height standards are presented in Figure 2 below.

Density and Building Heights Strategy	FAR		Dwellings Per Hectare			No. of Storeys			
	Prevailing	Target	Prevailing	Target*		Prevailing		Target	
				Lower	Upper	Lower	Upper	Lower	Upper
<b>City</b>	2.5 - 7	4+	10 - 25	100	N/A	2	5	4	8**
City Centre	2.5 - 7	4+	10 - 25	100	N/A	2	5	4	6
North Docks	0.5 - 1	3+	0 - 40	100	N/A	2	3	4	7
South Docks	0.5 - 1.5	4+	0 - 10	100	N/A	2	4	5	10**
<b>Fringe / Corridor / Centre</b>	1.0 - 3.5	2.5 - 4+	25 - 100+	50	150	2	6	4	7
City Fringe / Corridor	1.5 - 3.5	2.5 - 4.5	25 - 100	50	150	3	6	5	7
Mahon	0.5 - 3.5	1 - 4	10 - 40	50	120	2	5	4	6
Blackpool	0.5 - 3.0	1 - 4	0 - 40	50	120	2	5	4	6
Wilton	0.5 - 3.5	1 - 4	10 - 25	50	120	2	4	3	5

Figure 1 Key Cork City Density & Building Height Standards. Source: Draft Development Plan.

The density target in appropriate locations is welcomed and supported by the LDA. The minimum to maximum standards approach allows for a degree of flexibility in the delivery of residential schemes whilst also allowing for an increase in height where appropriate. Furthermore, the Character Area specific density and height targets are noted and welcomed. However, whilst it is acknowledged that deviations from these land use targets may be considered on their merits, we would favour greater flexibility on these targets to include a development which has a wayfinding and design function.

### 4.2. Funding

In terms of funding the Draft Development Plan notes that “the Council will pursue a range of funding sources, by way of development contributions and other Council income, along with Exchequer and EU funding to support the implementation of the plan”.

Notwithstanding the above, the LDA would seek further information regarding funding to bring forward development. In this regard it is noted that the “Council will seek to maximise delivery of strategic funding initiatives like the Urban Regeneration and Development Fund (URDF), the Local Infrastructure Housing Activation Fund (LIHAF) and the Serviced Sites Fund (SSF)/Affordable Housing Fund (AHF) that support local authorities in providing key enabling infrastructure”. Therefore, further clarity on the funding available through both the URDF and Local Infrastructure Housing Activation Fund (LIHAF) would be welcomed.



## **5. Transport**

The Draft Development Plan approach to land use, transport and promotion of sustainable travel is welcomed and supported by the LDA. The Draft Development Plan is set to align with the Cork Metropolitan Area Transport Strategy (CMATS) which is also supported. Whilst the delivery phasing of the key transport services and infrastructure is noted, information on the funding and timelines for delivering schemes such as the LRT and the proposed bridges in the Docklands area would be welcomed. The LDA would welcome more emphasis in terms of relevant policy objectives to support a modal shift towards healthy active and sustainable mobility in the design and delivery of development during this plan period.

### **5.1. Parking Standards**

The approach of the Draft Development Plan to car parking and cycle parking is noted and welcomed. The Car Parking standards divide the City into zones based working the centre outwards. The standards are noted as maximum and this is welcomed. It is also noted that the Docklands area, which the LDA has significant interest in terms of relevant state lands for the delivery of housing, has its own parking standards which are also noted and welcomed.

Policies that support with reducing travel demand by the private car are welcome by the LDA particularly in highly sustainable locations, such as Cork City, and there is an opportunity to ensure that masterplans and site designs seek to optimise connectivity and ease of access to sustainable and active travel to support low carbon development.

It will be important to ensure that a step change to prioritise sustainable travel can be achieved over time with due consideration regarding transitional requirements. It is noted that the car parking standards are based on the upgrading of transport infrastructure as identified. Therefore, further information on how development can move forward in advance of this infrastructure coming forward is welcomed in relation to parking standards, together with how a flexible approach to parking might be applied between to support a modal shift to active and sustainable mobility.





## 6. Site Specific Submissions

As noted at the outset, the LDA is keen to progress a strategic and collaborative approach to unlocking the regenerative potential of state lands to deliver wider benefits and deliver on the City's core strategy and vision.

The LDA is actively reviewing certain relevant public lands and progressing initial feasibility for a number of sites identified within Cork City which the LDA considers has potential for development to deliver compact urban development and regeneration. This section sets out the current Draft Development Plan context and sets out the general aspirations for each site and makes suggestions to strengthen the potential future delivery of residential accommodations and/or opportunities for urban regeneration on these key sites.

### 6.1. Docklands Sites

#### 6.1.1. Site Location and Context

The Docklands Sites identified below are located within the South Docks and are currently being examined as strategic sites for plan led development which are to be progressed in the lifetime of the Draft Development Plan. These aspirations are being supported by the creation of a "Docklands Delivery Office" which will be resourced via a partnership between the LDA and Cork City Council.

The sites include ESB lands to the north and south of Monahan Road which currently contain previously used infrastructure and structures. The northern site has a frontage on to the River Lee and is well connected to the wider Docklands and the City Centre via Centre Park Road which effectively bisects the sites. A further site currently under the ownership of Bord na Mona is shown to the southeast as per the indicative site location map included at figure 3 below.



Figure 2 Site Location of Docklands Sites (red boundary), Cork Docklands. Source: Google Maps



### 6.1.2. Current Draft Development Plan Context

In the context of the current Draft Development Plan the northern site is zoned entirely for ZO 02 New Residential Neighbourhoods (ZO 02) with a zoning objective *“to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure”*.

The southern site is zoned partially for ZO 02, ZO 13 Education (a Primary School) and ZO 17 Sports Facilities. See site location within zoning map context at Figure 5. The development management standards within the Docklands are noted and future development will accord fully with development management standards. It is noted that the northern part of the northern site is within an appropriate zone for a tall building as at Figure 4 below, also noting the approach to building height and density in the area.



Figure 3 City Docks Zones Appropriate for Tall Buildings. Source: Draft Development Plan.





Figure 4 Site Location (red line) within zoning map context, ZO 02 New Residential (Yellow shading), ZO 13 Education (Orange) and ZO 17 Sports Facilities (Light Green shading). Source: Draft Development Plan.

The sites are within three different areas of the proposed City Docks Character Areas. The northern site is within the Wharf Quarter and the southern site is within the Canal Walk. See Figure 6 below showing the sites within the City Docks Character Area mapping.

We note that there are land use targets associated with each character area, which are set out below:

- Wharf Quarter: 90% residential with 10% Non-Residential uses;
- Canal Walk: 80% residential with 20% Non-Residential uses; and
- Polder Quarter: 95% residential with 5% Non-Residential uses.

It is noted that a deviation from the above targets is subject to justification and whilst we welcome this approach, we would respectfully request greater flexibility on this having regard to the need to further examine the detailed requirements for the South Docks as part of a comprehensive future Masterplan for the lands.



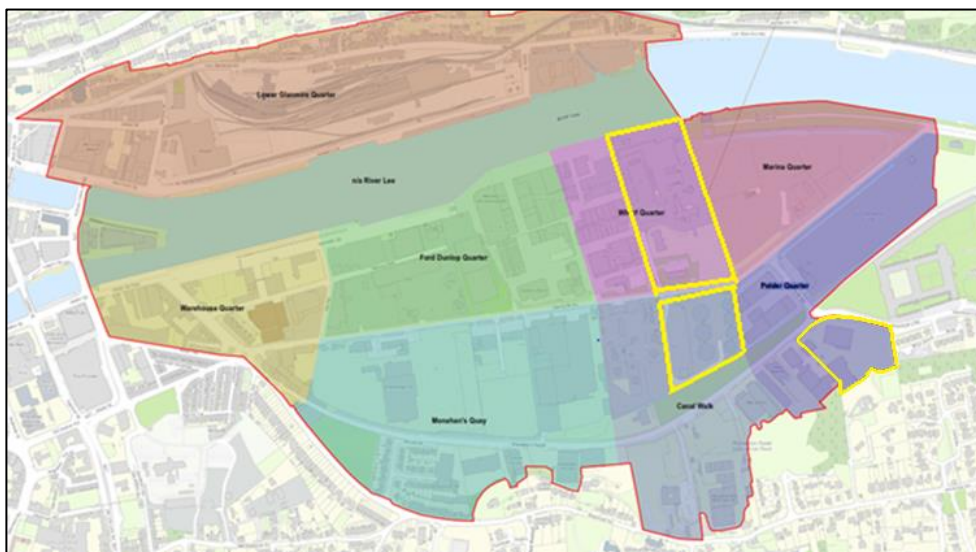


Figure 5 Site Location (yellow line) within City Docks Character areas. Source: Draft Development Plan.

There are references within the Draft Development Plan (Paragraph 10.27 and Objective 10.17) to urban design masterplans for the City Docks (South Docks) along with character area guidance to guide the development of individual sites or areas in the City Docks. In planning for the comprehensive redevelopment of this strategic area, it is suggested that a Framework Masterplan is required in the first instance which can incorporate, or subsequently inform an urban design strategy for specific character areas and this should set out the principles and approach and key opportunity sites to support and enable the area to come forward over time. In the absence of the lapsed South Docks Local Area Plan (2008), a framework masterplan is required to enable the delivery of an integrated, high-quality development where infrastructure delivery is delivered in step with housing and employment growth.

Cognisance should also be had as appropriate for the potential role of new Urban Development Zones referenced in the Government's recent *Housing for All* publication. This approach is expected to be aimed at enabling public authority-led master planned areas which are identified as having significant capacity for growth well in advance of individual site planning applications and to help ensure that the scale of development and level of investment required is understood and provided for at the outset. The benefit of these is also to ensure effective public participation at the earliest possible stage. It is considered that such an approach, subject to Government clarifying the details, and further discussions to explore potential to support with achieving the aims for rejuvenation and development of the strategic areas of significance such as Cork Docklands and Cork Port.

### 6.1.3. Suggested adjustments

The proposed approach to the Docklands sites within the Draft Development Plan is noted and the LDA will be seeking to progress the development of these sites in a strategic and collaborative context, working closely with the Council and the other key stakeholders such as the Department of Education to agree a framework for development in line with the Council vision for the Docklands. Coordination between all landowners will be of critical importance in order to ensure that a joined up, plan led approach to the regeneration of the South Docks.





In this context, a proposed Framework Masterplan for the Docklands would be welcomed to ensure that development comes forward in an integrated, logical, planned and timely manner with due regard to the infrastructure requirements and costs and phasing, and there may be potential for consideration of Urban Regeneration Designation where relevant and appropriate, but it will be important to have a strategic framework plan that considers the long term while also enabling key sites to be progressed during the lifetime of the plan as relevant. Therefore, further clarity about the designation of the majority of the Docklands as Tier 2 and Tier 3 lands, which include the sites identified above. These lands are included within the Docklands and will come forward for development within the lifetime of the Plan in a similar way to the recently consented sites to the north and east.

## 6.2. Kilbarry Site

### 6.2.1. Site Location and Context

The Kilbarry site is located to the North of Kilbarry Enterprise Centre on the western side of Dublin Hill Upper. Please see indicative site location map at Figure 7 below. The site is currently in agricultural use but remains closely linked to the urban fabric within the area due to the surrounding built development. The site is well located in terms of amenity and the River Bride flows through the North-West of the site.



Figure 6 Site Location (red boundary) Kilbarry Site. Source: Google Maps.

### 6.2.2. Current Draft Development Plan Context

The site is partially zoned as ZO 01, a sustainable residential neighbourhood, which has an objective *“to protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses”*.



The northern area of the site is zoned as ZO 03, Tier 3 Residential Neighbourhoods which has an objective “to provide for new residential development in the long term, in tandem with the provision of the necessary social and physical infrastructure”. The north-western fringe of the site is zoned as ZO 16, public open space. Please see the site boundary within the land use zoning map at figure 8 below.



Figure 7 Site Location (red boundary) in land use zoning context map, ZO 01 Sustainable Residential Neighbourhood (Light Yellow shading), ZO 03 Tier 3 Residential Neighbourhoods (Red & White shading) and ZO 16 Public Open Space (Green shading). Source: Draft Development Plan.

The site is subject to the general provisions of the Draft Development Plan, in term of residential density and building height and these standards are noted.

### 6.2.3. Suggested adjustments

The zoning objectives for the site are noted with wholesale development at the site unlikely to come forward during the lifetime of the Draft Development Plan. Given the strategic importance of the site and the scale of potential future development, it will be necessary to prepare a comprehensive Framework Plan to guide and inform future development activity. This Framework Plan could form part of the proposed Framework Masterplan for the wider Blackpool/Kilbarry Area listed in Table 2.5 (Summary of Key Objectives for City Growth) and Objective 10.76 of the Draft Development Plan. The LDA will work closely with Cork City Council towards to inform the Framework Plan.

The proposed infrastructure for the area is welcomed and this will form a major part of the future proposed Framework Plan.



### 6.3. Wilton Site

#### 6.3.1. Site Location and Context

The Wilton site is located to the north of the N40 to the south of Wilton Shopping Centre. Please see indicative site location map at Figure 9 below. The site is currently occupied by an ESB depot to the south and a piece of open land to the north. The site is well connected to the local and national road network and is adjacent to Wilton Shopping centre to the north and existing residential development to the west.



Figure 8 Site Location (red boundary) Wilton Site. Source: Google Maps.

#### 6.3.2. Current Draft Development Plan Context

The southern part of the Wilton site is currently zoned as ZO 15 Public Infrastructure and Utilities which reflects its existing use as an ESB Depot. The northern part of the site is zoned as ZO 01 Sustainable Residential Neighbourhood. Please see the site boundary within the land use zoning map at figure 10 below. The density and building height standards for the site are the proposed in the Draft Development Plan are noted and will form the basis of a future application on the site.







Figure 9 Site Location (red boundary) in land use zoning context map, ZO 01 Sustainable Residential Neighbourhood (Light Yellow shading) and ZO 15 Public Infrastructure and Utilities (Brown shading). Source: Draft Development Plan.

### 6.3.3. Suggested adjustments

The proposed zoning of the site is noted and welcomed. However, in terms of the density and height strategy for the site we note that the site is split between the “Inner Urban Suburbs” and “Outer Suburbs” designation as indicated in the zoning map reproduced at figure 11 below. We therefore respectfully request that the entire site is included within the “Inner Urban Suburbs” designation and the mapping at figure 11 is amended. The rationale for this is to allow for a strong urban edge adjacent to Sarsfield Road.

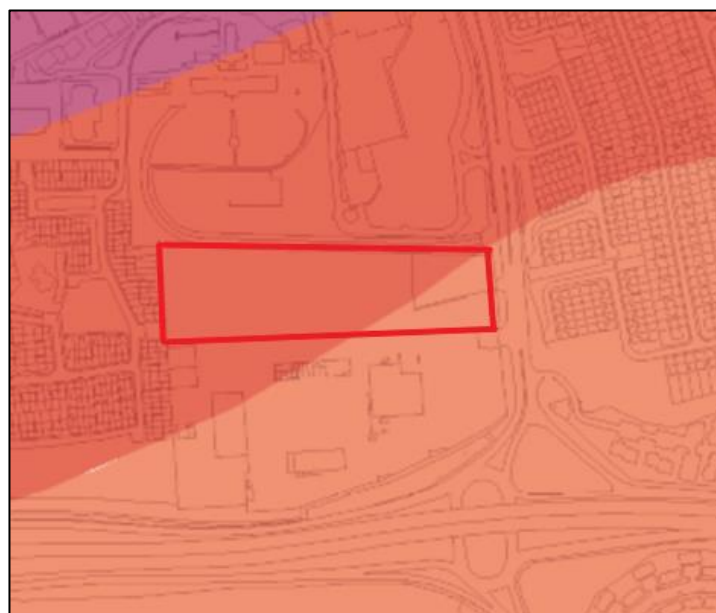


Figure 10 Density and Building Height Mapping, site location (red line), Inner Urban Suburbs (Red Shading), Outer Suburbs (Orange shading). Source: Draft Development Plan.



## 7. Conclusion

Overall, the LDA is supportive of the principles of the Draft Development Plan. The strategic objective for compact, liveable growth is fully supported and welcomed. However, the role of the LDA as a major stakeholder both nationally and within Cork in the master planning and delivery of relevant state land should be recognised within the Draft Development Plan. Therefore, the inclusion of a specific objective to support and recognise the role of the LDA would ensure that the partnership between the Council and the LDA will be further strengthened.

The proposed strategic development areas, which include the Docklands area are welcomed and the LDA looks forward to working in partnership with the Council to bring forward development of these sites in line with the vision and objectives as set out by the Council in the Draft Development Plan. Furthermore, the creation of the Docklands Delivery Office is an opportunity to collaborate to ensure delivery of key infrastructure for these areas such as the LRT and new bridges across the River Lee which are key to the success of these proposals. Therefore, further clarity on the funding of these projects and the timescale for implementation should be provided.

The proposed development management standards which include density and building height targets are noted and welcomed not least given the flexibility provided. The approach to housing mix and tenure is also noted and in particular the flexibility of provision is welcomed.

In terms of the site-specific commentary, the proposed sites present excellent opportunities to develop high quality, residential led schemes which should be promoted for development in the lifetime of the forthcoming Development Plan. In particular the Docklands sites are well places to come forward for development within the lifetime of the Draft Development Plan, however further clarity is required to ensure this development is delivered in a timely and orderly way rather than piecemeal development of individual sites. Therefore, the Docklands Office and the future partnership between the LDA and Cork City Council is key to deliver the growth targets for Cork.

Overall, we look forward to working with the Council in the coming years to deliver on the aspirations and objectives as set out in the Draft Development Plan and to the adoption of the Plan in due course.

*Your faithfully,*

Ciara Slattery  
Town Planner  
Land Development Agency