



COAKLEY O'NEILL
town planning

Submission to the Draft Cork City Development Plan 2022 - 2028

Prepared in October 2021 on behalf of
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1.0 INTRODUCTION

- 1.1 We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, are instructed by our clients, Kevin O'Leary Group, to make this submission to the draft of the Cork City Development 2022 - 2028. Our clients very much welcome the draft Plan and it is hoped that the points raised in this submission will be of benefit to the Council in the final preparation of same.
- 1.2 The purpose of this submission is to highlight the strategic importance of the Blackpool Valley to the development of both the northside and the city as a whole. Specifically, we request that our clients site to the north off the N20 Road be rezoned from Light Industry to Residential.

2.0 LOCATION AND DESCRIPTION

- 2.1 Our clients' lands are centrally located within Blackpool Valley, north of the Commons Road and within the 60-km/h zone on the N20 National Primary Route. The River Bride divides the lands running in a northwest/southeast direction.



Figure 1: Subject site at Commons Road, Blackpool, Cork

- 2.2 The lands are part of a commercial / industrial area extending outwards from the Blackpool area. There is a Circle K service station, a car sales outlet, and McDonalds drive-through restaurant to the east. To the west there are a number of two storey detached houses fronting the N20. Boland's Industrial Estate lies to the north, which contains Snap on Diagnostics engineering company, Embankment Machinery Sales and Cork Builders Providers. To the south and across the road, there are residential apartments.



3.0 PLANNING POLICIES AND OBJECTIVES

Ireland 2040: National Planning Framework

3.1 The National Planning Framework (NPF) outlines the Government's Plan to cater for a predicted extra million people that are expected to be living in Ireland by 2040. In relation to Cork, the NPF sets a growth target for at least 50% for Cork City and suburbs by 2040. These projections equate to approximately 324,000 people and such growth means enabling Cork to grow over twice as much to 2040 as it has over the past 25 years.

3.2 Yet, in a paper accompanying the NPF, entitled *Prospects for Irish Regions and Counties: Scenarios and Implications* (ESRI, January 2018), Cork is compared with other European second tier cities. It found that Cork is much smaller than its international counterparts; the implication being that in the context of central place theory, Cork under-performs in value functions and requires significantly accelerated and city focused growth in order to complement Dublin and drive the development of the Southern region.

3.3 In terms of overall approach, the NPF advises:

*A major new policy emphasis on **renewing and developing existing settlements** will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites.*

3.4 Section 2.6 of the NPF notes that the physical format of urban development in Ireland is one of the country's greatest national development challenges. Compact growth of urban areas is therefore supported, and Table 2.1 sets out a target that 30% of all new housing outside of cities will be within existing urban footprints. Section 4.5 states:

*The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. **This is applicable to all scales of settlement, from the largest City, to the smallest village.***

An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest City to the smallest village, has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less.

3.5 National policy is thus directed at making better use of under-utilised land and support for compact growth in existing cities, towns and villages. In this respect, **National Policy Objective 6** seeks to:

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

3.6 In addition, **National Policy Objective 11** states:

There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth.

3.7 Key future **growth enablers for Cork** outlined within the NPF include the following:

- Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors;
- Development of a new science and innovation park to the west of the city, accessible by public transport;
- The development of a much-enhanced Citywide public transport system to incorporate subject to further analysis, proposals for an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport;
- Improved traffic flow around the city, which subject to assessment could include upgrade of the N40, and/or alternatives which may include enhanced public transport.

Regional Spatial and Economic Strategy for the Southern Region, 2020

3.8 The aim of this Strategy is to translate the objectives of the NPF into the development of the southern region of the country. 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.

3.9 One of the key principles in developing the strategy is the need to provide adequate quantity and quality housing for existing and future housing demand including addressing the current housing crises and homelessness.

3.10 Regional Policy Objective (RPO) 8 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 where it can be served by public transport, walking, and cycling.

3.11 As part of the Cork Metropolitan Area Strategic Plan (MASP), Blackpool is identified as a Strategic Employment Location, Mixed Use Employment and Regional Asset being a location with significant existing property assets, lands and growth potential for jobs and employment.

3.12 Section 7.3 also identifies the Blackpool Valley as a Strategic Residential and Regeneration Area, where it is advised that the potential for 950 new residential units exists:

The Blackpool Valley, Kilbarry and the Old Whitechurch Road area have opportunities for significant mixed-use regeneration and residential and enterprise development providing a northern gateway to the city from the Limerick Road.

Current Cork City Development Plan 2015 - 2021

3.13 The current Cork City Development Plan 2015 indicates that the Blackpool Valley has significant opportunities for 'brownfield' development for a range of uses. It is also advised that the development of a new Blackpool commuter rail station will improve access to the area and that the development strategy for a large part of the area is detailed in the North Blackpool Local Area Plan 2011.

3.14 Blackpool is identified as strategic employment location, a key regeneration target and one of the major development opportunities in the city suburbs. The valley area comprises a range of different zoning objectives, including district retail centre and mixed use. Objective 14.2 sets out how these are to be achieved.

3.15 Our clients' lands currently have two separate zoning objectives: Residential, Local Services and Institutional Uses on the area to the south of the Bride River and Light Industry to the north.

3.16 The North Blackpool Local Area Plan sets out a vision for North Blackpool, 'to develop its role as the economic and social heart of the northside of the city and gateway to the city' in tandem with the objectives of the Farranferris Local Area Plan 2009 and the Blackpool Village Area Action Plan 2010.

Draft Cork City Development Plan 2022 – 2028

3.4.1 In the draft Cork City Development Plan, 2022 our clients' site is to have two zoning objectives; 'ZO 01 Sustainable Residential Neighbourhoods' to the south of the River Bride and 'ZO 10 Light Industry & Related Uses' to the north of the River Bride. These objectives are outlined as follows:

Z001 Sustainable Residential Neighbourhoods' zoning objective is outlined in section 12.23 and as follows:

The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City's built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents.

ZO10 Light Industry and Related Uses zoning objective is outlined in section ZO 10.1 and as follows:

The main purpose of this zoning objective is to provide for and protect dynamic light industry and manufacturing employment areas. Primary uses in this zone where the primary activity is the manufacturing of a physical product and which activity is compatible with being located near to residential areas. Primary uses include light industry; small to medium sized manufacturing and repairs; wholesaling; trade showrooms; retail showrooms where ancillary to manufacturing, fitting and business to business activity; car showrooms; and incubator units. Other uses may include warehousing, logistics, storage and distribution, subject to local considerations. Offices ancillary to the main light industry, manufacturing or employment use are also acceptable.

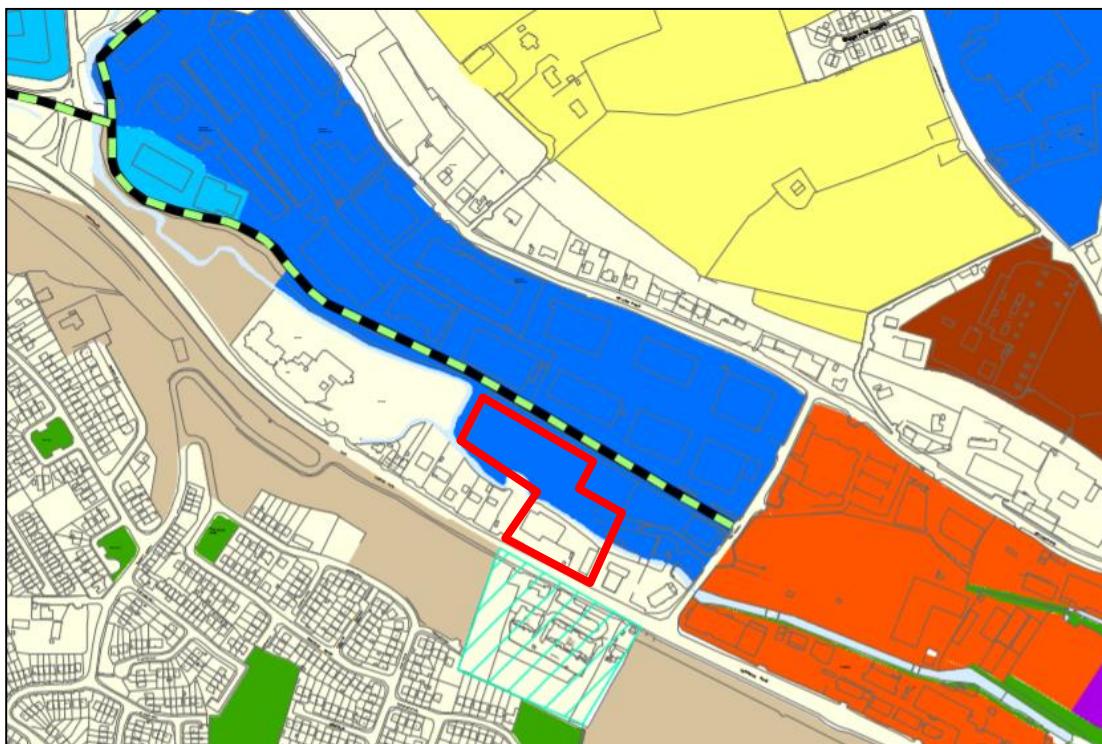


Figure 2: Proposed zoning of the subject site (generally outlined in red) as per Map 04 in the draft Plan, 2022.

3.4.2 Under the proposed Plan, the following City Suburbs Objectives for Blackpool/Kilbarry are outlined:

Objective 10.75 Blackpool/Kilbarry Expansion Area: To support the compact growth and development of Blackpool/Kilbarry Expansion Area as a strategic City expansion area, as identified in the Core Strategy. All development shall be designed, planned and delivered in a co-ordinated and phased manner, using a layout and mix of uses that form part of an emerging neighbourhood integrated with the wider area.

Objective 10.76 Blackpool/Kilbarry Framework Plan: Cork City Council will produce a Framework Plan for the development of the Blackpool / Kilbarry area. The coordinated provision of services, infrastructure, mix of land uses, transport and mobility, quality urban design and development will form part of the overall framework.

Objective 10.77 Blackpool Neighbourhood Centre Regeneration Plan: Cork City Council will produce a Plan for the regeneration of the Blackpool Neighbourhood Centre. The coordinated provision of services, infrastructure, mix of land uses, transport and mobility, quality urban design and public realm development will form part of the overall framework.

Objective 10.78 Blackpool/Kilbarry Development Objectives:

(a) To create a high quality, vibrant, distinct and accessible mixed-use urban centre in Blackpool, serving as an attractive northern gateway to the City and a desirable destination for northside suburban communities, encompassing a mix of retail, employment, residential, community and recreational uses.

(b) To facilitate the development of an integrated public transport interchange centred on the creation of a new commuter rail service and connecting bus services. To encourage and support sustainable residential and employment development in the Kilbarry area along with upgrades in public transport and roads infrastructure.

(c) To respect and enhance the built heritage and architectural character of the area, through the creation of a high quality public realm and high standards of building design.

(d) To preserve and enhance the sensitive and distinct landscape, visual character and biodiversity of the area and in turn provide for recreational uses, open space and amenity facilities.

4.0 DISCUSSION AND SUBMISSION

Introduction

4.1 Our clients' lands are located within the Blackpool Valley, in the historic heart of the northside of the city. Their future redevelopment fully accords with **National Policy Objective 6** of the NPF which seeks to regenerate and rejuvenate cities as environmental assets, that can accommodate changing roles and functions, increased residential populations and employment activity.

4.2 It is undeniable that the Blackpool Valley has for a long time now had significant potential for regeneration, redevelopment, and expansion, both as a strategic employment location and a mixed-use residential development location. Yet, following large scale redevelopment and investment in the 1990s and 2000s under the Urban Renewal Schemes, no new development of any significant scale has occurred in the past decade.

4.3 It is submitted that the new Development Plan must seek to address this in both more strategic and focused manner if the area's potential is to be unlocked in the period of the Plan.

Addressing Spatial Imbalance and Prioritising Development on the Northside of the City

4.4 For the past 40 years, City Development Plans 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.

4.5 The need to rebalance development towards the northside was first given significant attention and status in both the LUTS Plans from 1978 and 1992.

4.6 The Cork Area Strategic Plan from 2001 concluded 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 in the 1980s.

4.7 In this regard, the rebalancing the city socially, economically, and spatially by providing for growth on its northside was a key strategic objective of both the 2011 CASP and its 2008 Update. Blackpool was a key focus for delivering this growth.

4.8 Cork 2050, however, 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.

4.9 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.

4.10 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.

4.11 This, we submit, is a significant omission. It is further submitted that development on the northside, with the Blackpool Valley at its heart, and rebalancing the city must be placed back at the heart of the strategic planning agenda for Cork.

4.12 Significant disparities remain between the north and southsides of the city. For a sustained period in more recent times, while the southside saw major expansion, the northside has lagged behind. It is evident that the rate of housing growth of the southside of Cork City far exceeds that of the northside, undermining the objective to rebalance development in the city. The risk remains that a large majority of future residential development will continue to be located on the southside of the city, further exacerbating the City's existing spatial imbalance.

4.13 The strategic employment location at Blackpool saw little growth over the period of the current City Development Plan, while others, particularly at Mahon and Little Island, continued to develop.

4.14 Therefore, despite what was a largely supportive planning policy environment, the spatial imbalance in the City's development has continued to widen. A fresh risk now presents itself with the preparation of a new Development Plan: that development is again focused to the south of the city along the urban edge between Rochestown and Bishopstown and at Ballincollig and Carrigaline.

4.15 It is for these reasons that this submission requests Cork City Council to provide additional policy support for the provision of residential and employment development in the northside of the City in order to rebalance its spatial development.

4.16 Aligned with this, it must be noted that Blackpool is an extremely important development node on the northside of the city. Its comprehensive redevelopment can go a long way to meeting the City Council objectives for employment and population growth and in doing so redress the imbalance between the north and south sides of the city.

4.17 It is also relevant that the case for a new rail station at Kilbarry is premised on the availability of a critical mass of population and employees to support the investment in its delivery.

4.18 On this basis, we suggest the City Council should place more emphasis on the promoting and supporting new development in the Blackpool Valley. The area was historically a bustling employment node accommodating traditional employment intensive uses. What remains on many of the traditional employment sites are redundant brownfield sites with excellent accessibility to Blackpool village and the

N20 Cork to Limerick National route. The appropriate zoning of these underutilised brownfield sites, such as our client's lands on the Commons Road, is one strategy which should be carefully looked at.

Housing Demand and Need

4.19 Our clients' lands in the Blackpool Valley, particularly those that are zoned Light Industrial, have remained vacant for an extended period of time, have development potential to provide for new residential uses. In this regard, the following commentary on housing need within the city is relevant.

4.20 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.

4.21 In terms of housing these new populations, the NPF 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 country's five cities and suburbs within their existing built-up footprints.

4.22 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 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 a more compact city, the NPF emphasises the uptake of infill and brownfield development and targets the potential of sites in key locations that are accessible by public transport, serviced and have access to established community facilities. Blackpool meets all of these criteria.

4.23 Housing growth targets for Cork City established in national and regional planning policy guidance are highly ambitious. The Draft Plan acknowledges this and advises:

Cork City 2040: The ambitious growth targets set out for Cork City in Project Ireland 2040 require long term planning. This includes active land management, long term investment, climate action, infrastructure led development, integrated community development and enhanced heritage, culture and arts. Delivering these will require sustained co-ordination between many city, regional and state stakeholders.

4.24 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 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.

4.25 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. All these issues are applicable to and impacting lands in Blackpool.

4.26 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. 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***.

4.27 The availability of housing is a critical issue for the successful and sustainable economic development of Cork and will adversely affect the region's ability to attract inward invest. 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.

4.28 To address the housing supply issues, the Government launched '***Rebuilding Ireland***' in 2016. This program sets out policy designed to accelerate housing supply in the Country. The Plan notes that persistent under-supply has been most marked in urban areas, especially in Dublin and Cork and other regional cities. Pillar 3 of the Plan is entitled *Build More Homes* and seeks to facilitate an increase in the output of private housing to meet demand at affordable prices.

4.29 More recently, the Government published its latest Plan in attempt to address housing supply '***Housing for All***.' The aim is to increase the supply of housing to an average of 33,000 per year over the next decade. The plan provides for an optimal mix of social, affordable and private housing for sale and rent. The plan is based on four pathways, leading to a more sustainable housing system:

- *Support home ownership and increase affordability;*
- *Eradicate homelessness, increase social housing delivery and support social inclusion;*
- *Increase housing supply;*
- *Address vacancy and make efficient use of existing stock.*

4.30 It is in this context that this submission must be considered.

Characteristics of Subject Site

4.31 Currently it is proposed that our client's site will have two separate zoning objectives. The front of the site which is in commercial use is proposed to be zoned residential. The rear of the site which has long been vacant is proposed to be zoned light industrial and related uses.

4.32 In the context of the entire site being in single ownership and our client's intention for its coherent and comprehensive redevelopment, we submit that having two separate zoning zonings is not appropriate.

4.33 In addition, with regard to the characteristics of the subject site the following points are of relevance:

- The site is brownfield and vacant. National, regional, and local planning policy seeks to utilise and redevelop such sites as they represent a much more sustainable pattern of development.

- The site's redevelopment would enhance the visual amenity of the Blackpool Valley, the key gateway into the city from the north.
- The site is at a central location within the Blackpool Valley, while also being accessible to residential areas to the south.
- The site is serviced and topographically flat.
- The site is at a lower level than the lands to its rear which are at a higher level and zoned for light industrial use. In this regard, the subject site is distinct and separate from these lands.
- The lands are focused on the Commons Road / N20 and in design terms have more in common with adjoining lands at a lower level.
- The site has existing access points from the N20 and Fitz's Boreen and its location within the 60-km/hr zone is favourable.

4.34 We submit that each of these characteristics together with the strategic context of the site's location within Blackpool reinforce the merits of the Council rezoning these lands with a single mixed use zoning objective.

4.35 **On the basis of the above, we respectfully request that our clients' site be rezoned from 'ZO10 Light Industry' to full comprehensive zoning for 'ZO 02 New Residential Neighbourhoods.'**

5.0 CONCLUSION

- 5.1 Our clients very much welcome the preparation of a new Cork City Development Plan and anticipate that the points raised in this submission will be seen as a constructive and productive contribution to the preparation of the final Plan.
- 5.2 The purpose of this submission is to respond to the matters raised in the draft Cork City Development Plan 2022 relating to the future development of the city, particularly focusing on the northside, and unlocking the development potential of the Blackpool Valley.
- 5.3 In doing so, it highlights the continued spatial and economic disparities evident between the north and southside of the city and the urgent need to facilitate the development of new residential development within built up urban areas of the city.
- 5.4 It points to the contribution that the development of our clients' lands can make to the achievement of the ambitious national and regional growth targets for the city and requests flexible and supportive policies and objectives to help facilitate their timely redevelopment for residential uses.
- 5.5 On all of these grounds, our clients site presents a strong credible case for the northern part of the site to be rezoned from 'ZO 10 Light Industry' to 'ZO 02 New Residential Neighbourhoods.'
- 5.6 Please refer all correspondence on this matter to Alannah Hurley, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork.