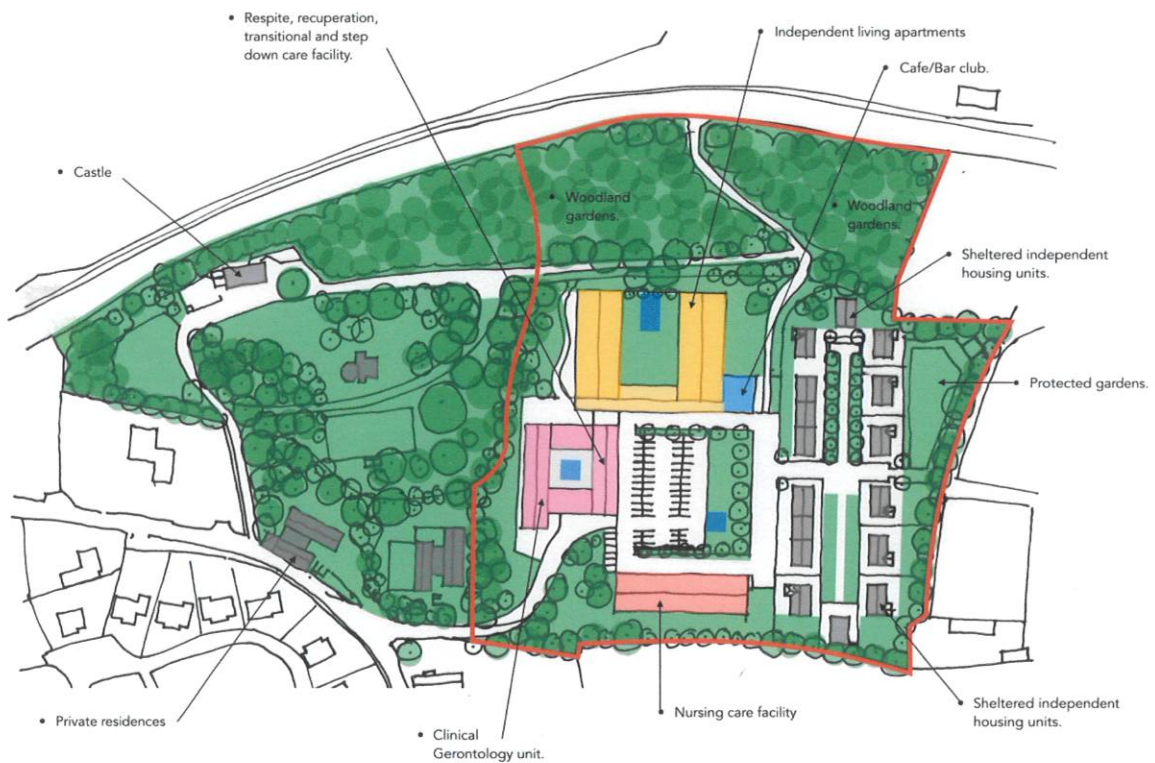


# Development Plan Submission



## Draft Cork City Development Plan 2022-2028 (Stage 2)

### Lands at Church Hill, Carrigrohane, Cork.

*On behalf of: Tulsan Ltd*

## Executive Summary

- This submission is made by Keystone Planning Consultancy Ltd, on behalf of our client Tulsan Ltd, and is submitted to Cork City Council in the context of the Draft Cork City Development Plan 2022-2028, which is currently on public display.
- Our client owns approximately 10.16 acres of land at Church Hill, Carrigrohane, Cork.
- Under the Draft Development Plan, it is proposed to zone the lands ZO 21 City Hinterland
- Our client is seeking to have this portion of their lands zoned as ZO 14 'Institutions and Community' and ZO 2 'New Residential Neighbourhoods'.
- The proposal is in line with National, Regional and Local planning policies
- Our client, who is an experienced developer with an excellent track record, is both desirous and capable of developing a 'state of the art' Care Village on the site.
- Our client, who is currently in the process of restoring the nearby Carrigrohane Castle, possesses the resources to deliver this project by Q1 2025
- The lands can be readily connected to the existing infrastructure proximate to the site.

# Table of Contents

- Executive Summary..... 1
- 1.0 Introduction ..... 3
- 2.0 Planning Legislation ..... 3
- 3.0 Site Location and Description ..... 4
- 4.0 Planning History ..... 5
- 5.0 Planning Context ..... 6
- 5.1 National Planning Context .....6
- 5.2 Regional Planning Context .....8
- 5.3 Local Planning Context.....8
- 6.0 Justification and Grounds of Rezoning Submission ..... 11
- 6.1 Serviceability of the lands .....11
- 6.2 Shortfall of Previous Strategy in Delivering Certain Housing targets.....12
- 6.3 Socio-economic impact of demographic changes.....13
- 7.0 Conclusion ..... 14

## **1.0 Introduction**

In accordance with Section 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), Keystone Planning Consultancy Ltd, Rossbrin, Frankfield View, Old Youghal Road, Cork, on behalf of our client, Tulsan Ltd., Unit 4, Sarsfields Court Industrial Estate, Glanmire, Cork wish to make this submission to Cork City Council regarding the Draft Cork City Council Development Plan 2022-2028.

This written submission is made in response to an invitation for comments from interested parties by Cork City Council. This submission is being made within the specified timeframe for submissions i.e. 4th October 2020, as set out on the Draft Development Plan's website.

Our client owns approximately 10.16 acres of lands at Church Hill, Carrigrohane, Cork. Our client is seeking to have this portion of their lands zoned as 'Institutional/Residential', in order to facilitate a planning application for the development of a Care Village at Church Hill.

The Care village concept is an innovative one, offering step down and downsized homes for those capable of independent living in a fully serviced community setting. As levels of dependency increase over time, the residents can remain in their homes with full support. As the capacity for independent supported living reduces, residents can remain in the community with family and friends but relocate to the higher dependency units within the complex.

All support services are self-contained within the facility which is designed with excellent amenity standards throughout.

## **2.0 Planning Legislation**

Section 9 of the Planning and Development Act, 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10, 11 and 12 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act, 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

*"12 - (1) Where the Draft Development Plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)—*  
*(a) send notice and a copy of the Draft Development Plan to the Minister, the Board, the relevant regional authority, the prescribed authorities, any town commissioners in the area and any city or county development boards in the area, and*

*(b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.*

*(2) A notice under subsection (1) shall state that—*

*(a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and*

*(b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan”.*

This submission to the draft of the Development Plan is being made in accordance with Section 12 (2) (b) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (4<sup>th</sup> October 2020) as set out on the City Council’s website.

### **3.0 Site Location and Description**

The subject lands, which extend to approximately 10.16 acres, are located in Church Hill, Carrigrohane, which is within the functional area of Cork City Council. The site is bounded on the north by the Carrigrohane Straight Road and on the west by Church Hill.

The subject site enjoys excellent connectivity to the amenities and community facilities within the Carrigrohane area. The site is 2.5km from the centre of Ballincollig (approx. 3-5min by shuttle), where residents can enjoy the town and all the facilities it offers.



The subject site is well serviced with churches, shopping, bars, cinemas, recreational areas and sports clubs located at Carrigrohane and nearby Ballincollig.

#### **4.0 Planning History**

Keystone Planning have carried out an examination of the planning history pertaining to the subject lands and surrounding area, which is summarised as follows:

##### **Subject Lands**

There is no record of previous planning applications on the subject site

#### **5.0 Planning Context**

##### **5.1 National Planning Context**

###### **Project Ireland 2040: National Planning Framework**

The National Planning Framework (NPF) is “*the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040*”. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that “*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 NPF seeks to target 50% of population growth to outside of the country's five main cities (above 50,000 population) and to consolidate such growth into Ireland's large towns, villages and rural areas and therefore the subject lands, being within the Birr catchment would be consistent with this aim.

The NPF states that *"the long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future."*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life.

#### **Section 6.4 of the NPF deals specifically with Age Friendly Communities and Older People**

*"ESRI projections indicate that the numbers of people aged over 65 will more than double to 1.3 million people by 2040, making up approximately 23% of the population. This compares to 13.5% in 2016. In addition, it is expected that the population aged over 85 will quadruple. As people get older they are likely to have increasingly complex healthcare needs, with a requirement for services and facilities to support provision of suitable and necessary care.*

*As more people live longer lives, they will want to stay healthy and independent, live in their own homes and communities and keep to a minimum their use of in-patient and out-patient hospital services. Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible. In providing a more seamless and appropriate continuum of housing choices with appropriate supports for older people and a built environment that is attractive, accessible and safe, older people will be supported and motivated to enjoy more active, healthy and connected lives and to age confidently and comfortably in their community.*

*This further reinforces the need for well-designed lifetime adaptable infill and brownfield development close to existing services and facilities, supported by universal design and improved urban amenities, including public spaces and parks as well as direct and accessible walking routes. The provision of such accommodation can provide opportunities for older people to downsize from larger houses within their existing communities. This may be integrated with more supportive communal and specialist care accommodation that will be required by some older people.*

*The 'Age Friendly Ireland' Initiative provides leadership and guidance in identifying the needs and opportunities of an ageing population and is embedded within the local government system, which, with support from Government, is best placed to respond to change at a local level."*

National Policy Objective 30 states:

Local planning, housing, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.
---

## **Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)**

Rebuilding Ireland, an Action Plan for Housing and Homelessness, provides a multi-stranded, action- oriented approach to achieving many of the Government's key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

In addressing the evolving needs of older people the document offers the following guidance:

*The ageing of our population represents one of the most significant demographic and societal developments that Ireland faces in the years ahead, with the number of people over the age of 65 expected to reach 1.4 million by 2041. Across this same period, the number over the age of 80 is set to quadruple, from 128,000 in 2011 to some 480,000. The implications for public policy in areas such as housing, health and urban and rural planning are considerable.*

*Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible. In terms of cost effectiveness, home care costs in Ireland are estimated to be consistently lower than hospitalisation. For many, living in adapted or specialist housing reduces reliance on health and social care services and can result in measurably improved health status and lower rates of hospital admissions, while also contributing to a greater sense of wellbeing.*

*There is, therefore, a requirement for a range of housing choices and options for older people. In developing that aspect of this Action Plan, account has been taken of a number of strands of Age Friendly Ireland's work including;*

- *A consultation process with older people across 31 local authorities,*
- *Findings from the Housing for Older People: Future Perspectives research study (2016),*
- *Initial results emerging from the Healthy and Positive Ageing Initiative survey which has involved c.10,500 household-based interviews,*
- *The training programme for local authority staff in housing, public realm and planning, and*
- *Learning from Age Friendly City and County multi-agency projects.*

*Older persons have specific housing requirements such as being in proximity to their family and social networks and the need for access to public and other essential services, recreation and amenities.*

*A new cross-Departmental/inter-agency approach will therefore be taken to progressing housing initiatives for older people, including a Dublin City Council pilot project for a sixty-*



home development which will be commenced in 2016, with opportunities for similar proposals in other local authority areas to be pursued in parallel.

Given the importance of housing adaptation and other grants that help older people live comfortably in their own homes for longer through local authority and HSE programmes, we will explore how the process of accessing these grants can be streamlined and simplified.

## 5.2 Regional Planning Context

The Southern Regional Spatial and Economic Strategy states:

The overall age structure for the Region mirrors that of the State. Population projections anticipate large increases in the 15-24 year (+26%), 45-64 year (+14%) and 65+year (+56%) age groups between 2016 and 2031.

It is submitted that the subject lands, which our client is seeking to have designated as 'Institutional/Residential' zoning, are ideally located to deliver this innovative project

## 5.3 Local Planning Context

### Draft Land Use Zoning (Draft Cork City Council Development Plan 2022-2028)

Under the Draft Development Plan, the site is proposed to be zoned "ZO 21 City Hinterland". However, our client is seeking to have the zoning on this portion of their lands revised to Institutional/Residential

Figure 3. Land Use Zoning in the Draft Development Plan 2022-2028 (subject site outlined in red)



The Draft Development Plan offers the following Objectives: -



### **Objective 3.10**

#### **Housing and Community for Older People (Age Friendly Housing)**

Cork City Council will actively seek to meet the housing and community needs of older persons by:

- a. Supporting mainstream housing options for older people and persons with disabilities (including but not limited to physical, mental health) consistent with NPO 30 of the NPF, and RPO 182 of the RSES.
- b. Supporting the adaptation of existing homes.
- c. Promoting opportunities for right sizing / downsizing by older people within their neighbourhoods to enable sustainable social networks and support to be maintained.
- d. Supporting the provision of integrated housing and community development specifically designed for older people in accessible locations that allow for wider engagement with existing communities.
- e. Integrating community facilities within a range of housing designed for the elderly such as assisted living homes and clusters (with support), transition clusters (combining mainstream and supported living) and step-down units (with care), and specialised care homes.
- f. Supporting the development of lifetime housing (Lifetime Homes Standard).
- g. Supporting the development of housing designed to Universal Design Standards.



## Objective 3.11

### Housing for Older People (Age Friendly Housing)

Cork City Council will support the planning and delivery of more specialised housing and community facilities for older persons that:

- a. Are located close to community and social infrastructure required by occupants (e.g. shops, post office, community centres, etc) ensuring older people can remain part of existing communities.
- b. Are easily accessible for residents, employees, visitors and service providers.
- c. Follow best practice, including the 'Positive Ageing' model, by actively engaging and integrating within the wider community while providing a safe environment for residents.
- d. Create strong links between the elderly and the local community including provision of activities linked to wider community groups.
- e. Follow all relevant standards set out in the 'National Quality Standards for Residential Care Settings for Older People in Ireland' published by the Health Information and Quality Authority (July 2016) or the relevant standards for any subsequent national guidelines.

It is respectfully submitted that the zoning of the subject lands as 'Institutional/Residential' will facilitate the development of an innovative facility supporting the needs of older people, (and their families), in the city's western suburbs.

Policy HP-17 of the Draft Plan states *"It is Council policy to encourage the compact growth of settlements; to promote healthy place-making; to increase the liveability factor of a place; to encourage the most efficient use of land; to ensure a mixture of residential unit types that are designed and constructed on the principles of universal design, life-long adaptability and energy efficiency; to support permeability and sustainable mobility with priority for pedestrians and cyclists; and in general to support the transition to a low carbon economy by way of reduction of greenhouse gases"*.

In this regard, the subject lands are ideally suited, being capable of offering a beautifully landscaped setting on the edge of Ballincollig Town and a short distance from the City itself. The development of the lands will provide modern housing, and sustainable living options for older people.

## 6.0 Justification and Grounds of Rezoning Submission

This planning submission proposes to have the lands identified as 'Institutions and Community/New Residential'.

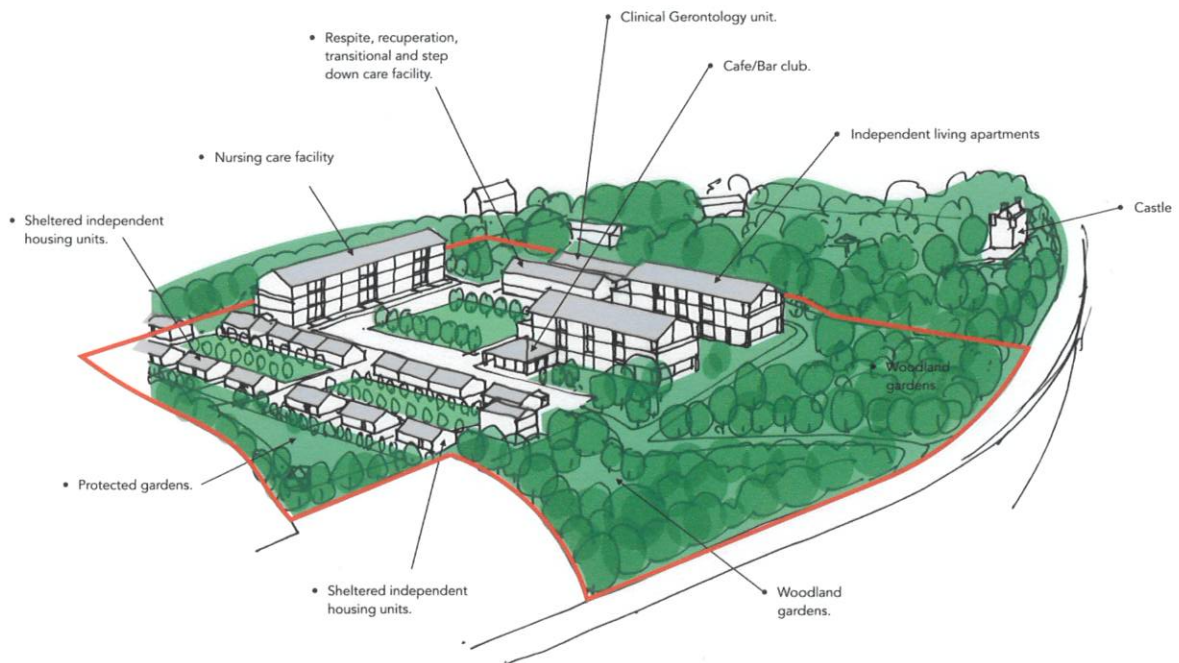


Figure 1. Draft Conceptual Design

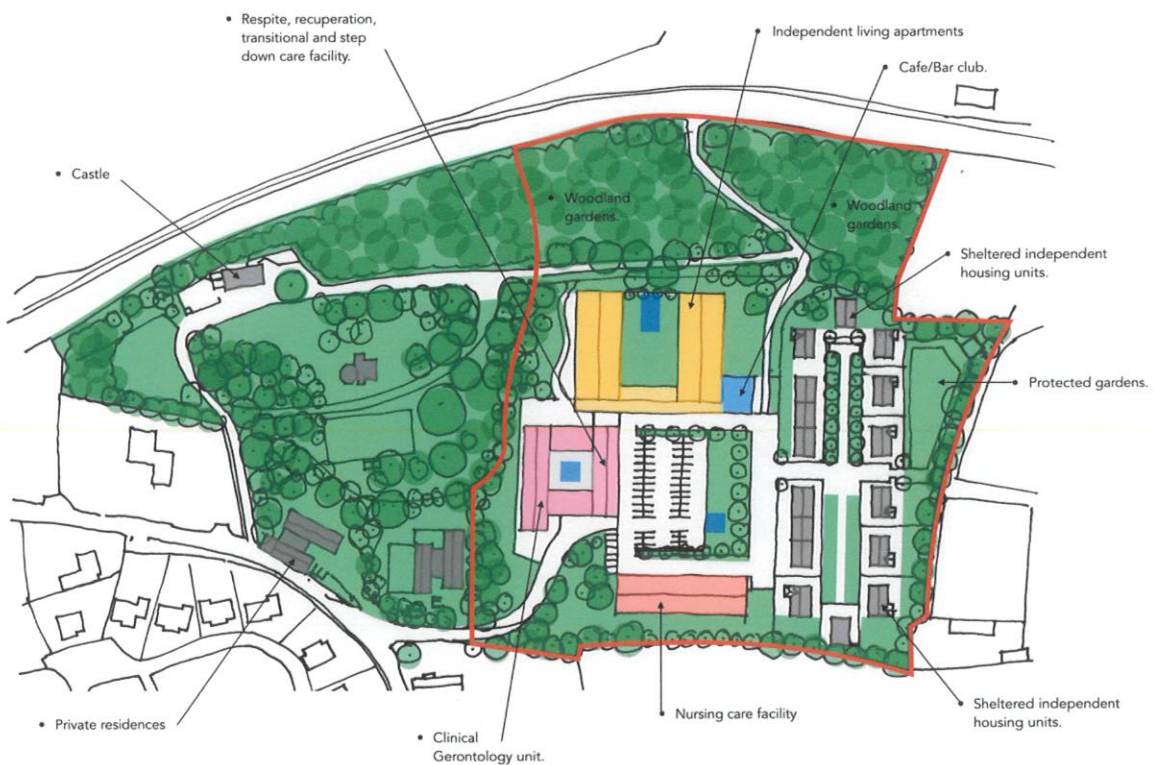


Figure 2. Draft Conceptual Design

The proposal offers: -

- Gated, secure community
- Sheltered Independent Housing Units
- Independent Living Apartments
- Nursing Care Facility
- Clinical Gerontology Unit
- Café/Bar/Club
- Shuttle Bus service to Ballincollig (10 returns daily) and City (4 returns daily)
- Protected Gardens, (with resident participation)
- Woodland Gardens and amenity walks
- Sports and recreation areas
- Respite, recuperation, transitional and step-down care facility
- 2.5km - 5mins to centre Ballincollig



It is important to point out that this is not a Nursing Home proposal. Primarily this is a downsizing facility for those capable of independent living where the residents can continue to live even when their level of dependency increases - allowing them to remain embedded in their chosen community.

### **6.1 Serviceability of the lands**

The lands are close to all required infrastructural services.

### **6.2 Shortfall of Previous Strategy in Delivering Certain Housing targets**

It is generally accepted that the economic recession that Ireland, experienced between the period 2008-2015, caused a significant slowdown in growth and housing output from as far back as 2006/2007, and that the previous housing allocation figures set out in the Cork City Development Plan 2015-2021 were not fully met for this demographic. There can be no doubt but that the demand for sustainable housing options for older people, which will support independent living for as long a period as possible, will increase substantially over the lifetime of the new Development Plan – and beyond.

In this regard, while other lands are zoned for residential use under the current and draft Development Plan, many of these lands have not and will not be developed during the

lifetime of the Plan due to various reasons including infrastructural constraints, financial constraints, inability or unwillingness of landowners to develop lands and also environmental considerations. However, in this case, there is a sizeable quantum of 10.16 acres that is owned by a proven developer and the subject site is shovel ready with all the necessary infrastructure available to allow development to commence.. The rezoning of these lands will help to meet a niche but rapidly expanding demand for functional solutions to housing for an exponentially aging population. Should the lands be appropriately zoned, it is Tulsan's intention to finalise and submit a planning application at the earliest opportunity and deliver the project by Q1 2025.

### **6.3 Socio-economic impact of demographic changes**

On 25th June 2019 the Central Statistics Office issued a Press Statement regarding Population Projections 2017 – 2036. The press statement clearly indicated that the size of Ireland's older population is set to expand rapidly in the coming decades.

- Ireland's population, which stood at 4.74 million in 2016, is projected to increase to between 5.33 million and 5.81 million by 2036
- The number of persons aged 65 years and over is projected to see increases in excess of 65.0% across all regions by 2036

According to the organisation's population projections, the number of people over the age of 65 across the country will increase by anywhere from 79.1% to 82.1% by 2036. The accompanying report set out expectations for the country's population growth based on six separate scenarios – each making different assumptions regarding fertility, mortality and migration.

It found that Ireland's overall population will reach anywhere between 5.33 and 5.81 million by 2036 – rising from the 4.74 million recorded in the 2016 Census. The Mid-East region of the country – which includes Dublin – will see the largest increases under all scenarios, swelling by between 15.15 and 16.6%. However, the older population will increase by at least 65% in all regions including the southern region.

The predictions also take into account expected increases in life expectancy. The CSO said men are expected to live 4.3 years longer than 2015 levels by 2036. The increase for women is slightly less at 3.2 years; however women will still be living an average of three years longer than men at 86.5 years.

A recent review of this trend in the Irish Times set out the following analysis, (quoted here in full) :-

*It is clear that Ireland is ageing fast, and our economy, health service – and society itself needs to adapt.*



By 2031 more than a quarter of a million inhabitants in the State will be aged over 80 years, a departmental review found. Photograph: John Stillwell/PA Wire

*For decades, Ireland has been in a demographic sweet spot. Among the raw fuels for Ireland's economic catch-up phase, which stretched from the early 1990s to the end of the Celtic Tiger, was a favourable age profile.*

*Irish birth rates remained high well into the 1980s, much longer than other European countries, meaning there is a large cohort of working-age people in the population. What's more, emigration trends in the 1960s and 1970s mean that many Irish-born people in old age don't live in the State, shielding the exchequer from the associated spending pressures of their ageing.*

*But now, Ireland is getting older. And that process will force hard choices. Ireland's ageing problem will exert more spending pressure on the already cash-strapped health service, asking it to make long-term, difficult strategic decisions – and get these big calls right.*

*What are the best ways to care for vulnerable older people? How can families ensure they are financially protected? Can Ireland avoid the scandals and institutionalisation of the past? How can the State pay for this ageing time bomb? There are few easy answers available to the difficult questions it poses.*

*Only one thing is certain: today's workers will age and retire, and live longer thereafter; this prompts the fundamental question: are we ready for Ireland to age?*

### **Demographics**

*Ireland at present is a "young" country, but the number of older people will soar in the years ahead. The Economic and Social Research Institute (ESRI), in a report in 2017, projected that by 2030 the population aged 80 or above would increase by between 89 per cent and 94 per cent.*

*A spending review by the Department of Public Expenditure found that by 2031 more than a quarter of a million inhabitants in the State will be aged over 80 years. Central Statistics Office (CSO) figures predict that those aged 65 years and over will increase significantly from a level of 629,800 in 2016 to potentially nearly 1.6 million by 2051.*

*And official projections suggest that the favourable ratios between younger and older persons experienced over recent years will be reversed in the decades ahead. In 2016 there were just over a million young people in the 0-14 age category, compared with just under 630,000 aged over 65. However, this picture will be turned on its head by 2031 under all scenarios envisaged. "The excess will increase steadily towards 2051, at which stage it is projected that there will be between 496,600 and 691,800 more older people than younger people," the CSO found.*

### **Impact of change**

*This shift will have considerable implications both in terms of public policy, for the health service and for the Government's finances in the years ahead.*

*According to the ESRI, demand in the residential long-term care sector, which covers nursing homes, is projected to increase by up to 54 per cent, "posing challenges for providers, for the regulatory authorities and for the exchequer to ensure that an appropriate standard of care and level of funding for care is provided for these vulnerable residents with intense care needs".*

*In the home help sector, demand for home help is projected to rise by 48 per cent; demand for publicly-financed home care packages will rise by 66 per cent. There will be pressure on other services, such as pharmacies, acute hospitals and occupational therapists. All this is playing out against the backdrop of a model of health service provision that has chronically struggled to provide adequate, on-budget care. This "will give rise to demand for additional expenditure, capital investment and expanded staffing and will have major implications for capacity planning, workforce planning and training".*

*Ireland already spends billions on older people; about €3.6 billion was spent on the ongoing provision of long-term residential care, 78 per cent of it by the State, in 2014. Health Service Executive (HSE) non-capital expenditure on the care of older persons was €1.57 billion in 2015, and with tens of thousands more people set to enter into the older cohorts of the population, those spending pressures will become more acute. "Additional investment will be required in most forms of care to meet the needs of a rapidly growing and ageing population," the ESRI warned in 2017.*

### **A fair deal?**

*The most high-profile State policy for this kind of care is the Nursing Home Support Scheme – more commonly known as Fair Deal.*

*This year the State will spend close to €1 billion on long-term residential care for more than 23,000 older people under the scheme. However, Fair Deal is also facing financial pressures.*

*The budget for the scheme this year is €985.8 million, an increase of €24.3 million over the previous year. However, in May the HSE's top-level performance oversight group raised*



*alarm that the cost of operating the Fair Deal scheme was €5.676 million ahead of the level projected.*

*It is understood that financial forecasts suggest that the overrun in the Fair Deal scheme will reach about €16 million by the end of the year. It is considered likely that the Government will have to provide additional funding as part of a supplementary estimate in the autumn. There are also concerns that waiting times for a nursing home place under the Fair Deal scheme are increasing significantly. Official figures given to Fianna Fáil on foot of a parliamentary question have revealed that the number of older people waiting for a Fair Deal nursing home place jumped from 729 to 846 in three weeks this summer. Delays in approving Fair Deal applications can have significant knock-on effects across the health system, leading to higher numbers of delayed discharges from acute hospitals – people whose acute hospital care has been completed. This in turn can drive up waiting lists and larger numbers on trolleys in hospital emergency departments waiting for admission to a bed.*

*A spending review carried out in 2017 found that Fair Deal had shown itself to be financially sustainable. However, it warned of potential developments that could jeopardise the sustainability of the scheme in the future.*

*One of these is the amount that the State pays to private nursing homes under the scheme. The private sector provides about 18,000 nursing home beds under the scheme, with about 5,000 public beds also available.*

*The Department of Public Expenditure spending review in 2017 maintained that not only were the average costs of public beds more than 1.5 times the cost of a private bed, but this gap had also widened over the previous three years. It maintained that the average monthly cost of care was €4,161 in private nursing homes and €6,427 in public nursing homes. It suggested that this could possibly be due to public nursing homes dealing with people requiring more complex care. However, private nursing home operators contended that the current funding model was jeopardising the sustainability of the sector.*

*The representative body Nursing Homes Ireland criticises different payments to private and public hospitals, and has argued that the fee system “must be clear, logical, rational, fair, transparent”.*

*A review of pricing under the Fair Deal scheme is currently being considered by the Department of Health. One of its main recommendations is expected to be a new system of graded payments to nursing homes based on the dependency of the resident.*

### ***A changing model***

*To deal with the future changes and the increased demands that these will bring about, the Government’s strategy is to move away from relying mainly on Fair Deal and existing home support arrangements.*

*“If you do what you always did, you will get what you always got,” the Minister of State at the Department of Health Jim Daly said last week. Daly said that while he did not see a*

*“doomsday situation” as a result of a growing older population, there were challenges to be managed.*

*In essence the Government’s proposals centre on reducing reliance on long-term nursing home care and expanding home care support arrangements, with additional funding likely being generated by a financial contribution from recipients.*

*The Government is also looking at housing and healthcare initiatives to offer more choice to older people than just long-term residential care. Daly said that not everyone needed a 24-hour, nurse-led clinical environment.*

*Experts argue that shunting older people into out-of-town nursing homes has poor outcomes in terms of physical and mental health, and is undesirable from a town planning point of view. Mick Bradley, an Irish architect with the Danish firm Zeso, has worked on innovative housing schemes that enable people to age in their communities.*

*“I don’t accept the idea that life ends when you retire. The current generation won’t even retire in the same ways we retire. There’s going to be a group that is healthier, will live longer, and be conscious of what life they want to live,” he says.*

*“It’s about having a much more optimistic vision of what can be achieved later in life. And that can be achieved by not shuffling people off when they hit 70.”*

*The Department of Health and the Department of Housing are working on developing a policy framework under which the Government could facilitate housing care for older people to deal with the increased pressures that will emerge as the older population grows. In the meantime, the existing services for older people are facing considerable strain. The HSE has a budget this year of just over €445 million to provide about 18 million hours of home support services to 53,000 people. Such services are either delivered by home helps directly employed by the HSE or by voluntary and private providers who have formal arrangements with the HSE.*

*At the end of June, HSE chief executive Paul Reid told the organisation’s board that the “level of demand cannot be met within the resource available”. At the end of April there were 6,310 people who had been assessed but who were waiting for funding for the provision of home support services. Reid said this included 4,646 new clients and 1,664 existing clients who needed additional services.*

*Providing services to encourage and facilitate older people to remain at home, including daycare facilities and meals on wheels, is not only considered to be beneficial to their own wellbeing, it is also far more cost effective for the State.*

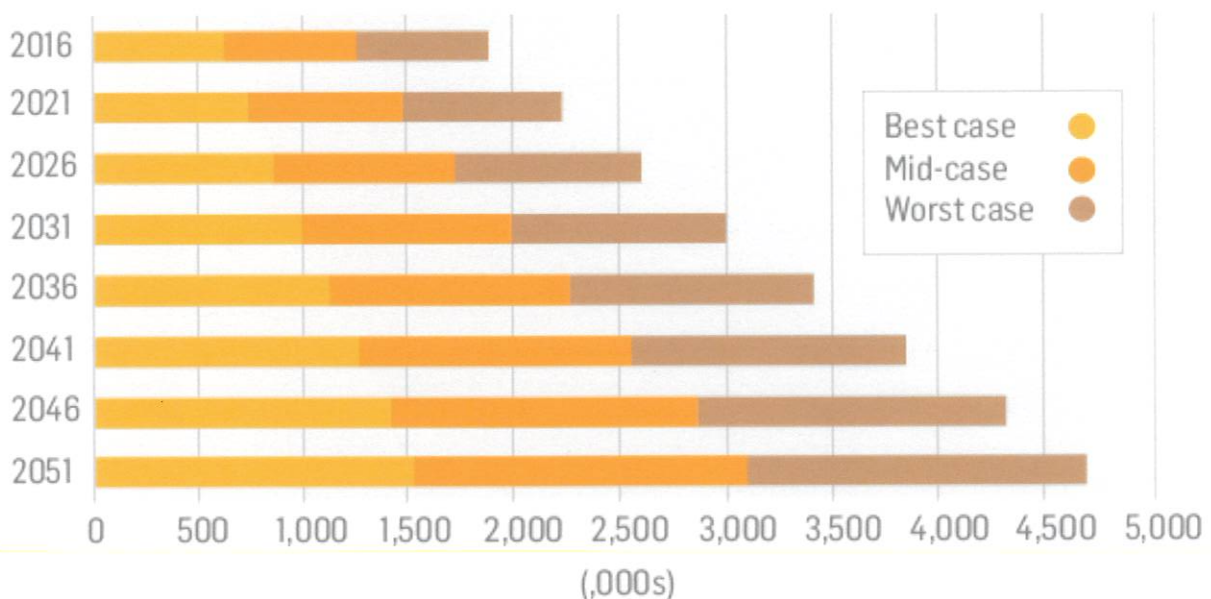
*A bed in a public hospital can cost about €1,000 per day, and facilities taken up by those no longer requiring acute care add to waiting lists for treatment.*

A place in a nursing home under the Fair Deal scheme will cost about €42,000 on average per year. While home supports may be more financially efficient, the rising costs have prompted questions on whether the current model can continue in the longer term. Last summer, the Department of Public Expenditure specifically raised the issue of whether older people should have to pay some of the cost of home services themselves. It pointed to a report by the Health Research Board in 2017, which looked at home care arrangements in place in four European countries – Germany, Sweden, the Netherlands and Scotland – where patients contribute directly or through insurance.

“This contrasts sharply with Ireland’s case, where applicants are subject to a medical assessment but no means test. Moreover, in Ireland no flat-rate contributions are required for home care and most targeted services.”

The Department of Public Expenditure paper said the absence of cost-sharing arrangements for home care services, “raises questions on [their] financial sustainability”. The department’s findings have made their way over the last year to the heart of Government. Daly said the introduction of a co-payment scheme for home supports was being given “active consideration”. Any such initiative is likely to come in tandem with an overall statutory scheme for the funding and regulation of home care which is likely to be announced at the start of next year.

### Projected population aged 65 years and over, 2016-2051



#### Gaps in regulation

If Ireland is to shift the emphasis on ageing to the home, and in the community, top regulators want reassurances that they will be given powers to do their job effectively. Phelim Quinn, chief executive of the Health Inspection and Quality Authority, tells *The Irish Times* that the toolkit available to his team “needs to change and it needs to change quite

*significantly". The shift to home care, which is largely unregulated, would move "huge chunks" of older people beyond the regulator's powers, he warns.*

*"There are vulnerabilities right across that spectrum, and we believe government needs to act to ensure they put safeguards in there," he says. "We need to be thinking about that now, rather than later."*

*He also calls on the Government to introduce legislation on adult safeguarding, which he says the State currently lacks. Introducing such laws would provide a further barrier to many of the financial, physical, psychological and sexual abuses older people are vulnerable to, he says.*

*He says there is a gap in the regulatory framework when it comes to safeguarding. "We work in the absence of any form of legislative framework for adult safeguarding in Ireland." "What we've got is a greater number of people entering health and social care services that are specifically vulnerable. I believe that is a huge challenge for the State and also a huge challenge for us as a regulator," he said.*

*Whether the State can deliver high-quality, good-value care for a growing segment of the population remains to be seen.*

There can be little doubt that these predictions will be realised. Consequently, we respectfully submit that the provision of an adequate supply of independent and/or sheltered living in retirement village settings should be prioritised as part of this Development Plan Review.

A policy which will allow older people to maintain an independent lifestyle while also providing security and care is of paramount importance.

Developments which offer largely independent retirement accommodation together with higher care move-on facilities will offer the opportunity for a transition from independent living to assisted care without the resident needing to leave their community.

Such facilities should offer clean, pleasant and affordable, private accommodation, with social support, for older people who need it, providing a variety of safe, attractive and comfortable accommodation for older people, in stimulating and pleasant surroundings.





Residents should pay rent according to their means with unobtrusive support available if needed.

Ideally such facilities should offer: -

- **Independent living with unobtrusive care for over 65s**
- **Close to public transport and all amenities**
- **Preferably close to a population hub**
- **Social Club/Games Rooms/Age friendly Gym**
- **Emergency help on call**
- **A cooked mid-day meal every day**
- **Residents' dining room/sun lounge**
- **Shared laundry rooms**
- **Shared kitchens to prepare light meals/snacks**
- **A guest room for occasional visitors**
- **Pleasant large landscaped area provided with universal mobility access**
- **A choice of one or two bedroom apartments/houses with a flexible third room apartments.**

Proximity to population centres makes it easy to be a part of the wider community, enjoying social activities at local clubs and societies. A shuttle bus service and Public transport close by will facilitate shopping or visiting friends and family.

### **A Continuum of Care**

If a resident's needs change, these facilities should have the capacity to accommodate that transition without the need for the resident to relocate. Developments which cater for a range of occupants ranging from those seeking semi-dependant living accommodation to those requiring a high level of care offer the most sustainable model for these essential services.



Local authorities are beginning to recognise and cater for this growing need.

Kilkenny County Development Plan states:

Nursing homes and residential care homes should be integrated wherever possible into the residential areas of towns and villages where residents and staff can avail of reasonable access to local services.

## 7.0 Conclusion

This submission has been prepared by Keystone Planning on behalf of our client, Tulsan Ltd., Unit 4, Sarsfields Court Industrial Estate, Glanmire, Cork, who wishes to make this submission to Cork City Council regarding the Draft Cork City Council Development Plan 2022-2028.

Our client owns approximately 10.16 acres of lands at Church Hill, Carrigrohane, Cork. Our client is seeking to have this portion of their lands zoned as 'Institutional/Residential', in keeping with the remainder of their lands at Church Hill.

Section 5 of this submission has identified that the rezoning of the lands to residential use is in accordance with national, regional and local planning policy. Furthermore, the rezoning of the subject lands is justified on the following grounds:

Our client, who is an experienced developer, intends to engage in a Section 247 pre-planning consultation with the Planning Authority regarding a proposed residential development on the subject lands and has submitted a Pre-Connection Enquiry to Irish Water for this proposed development.

The zoning of the Tulsan lands as 'Institutions and Community/Residential' is in accordance with the policies and objectives of the Development Plan and national and regional planning policies such as the NPF and RSES and will contribute in a significant way to meeting the housing and care needs of our older citizens.



We respectfully submit that the current review of the Development Plan is an ideal opportunity to future proof City Council policy for the challenges which lie ahead in the provision of housing for an aging population. Those challenges are readily identifiable but not so easily addressed. Private and public investment will be required to accommodate this inevitable need but an essential precursor is a planning policy which not only accommodates such development but positively encourages it.

Keystone Planning respectfully request that Cork City Council amend the Draft Development Plan accordingly

Yours Faithfully,

*D. O'Mahony*

---

Damien O'Mahony, BCL, LLM, MPRII.

