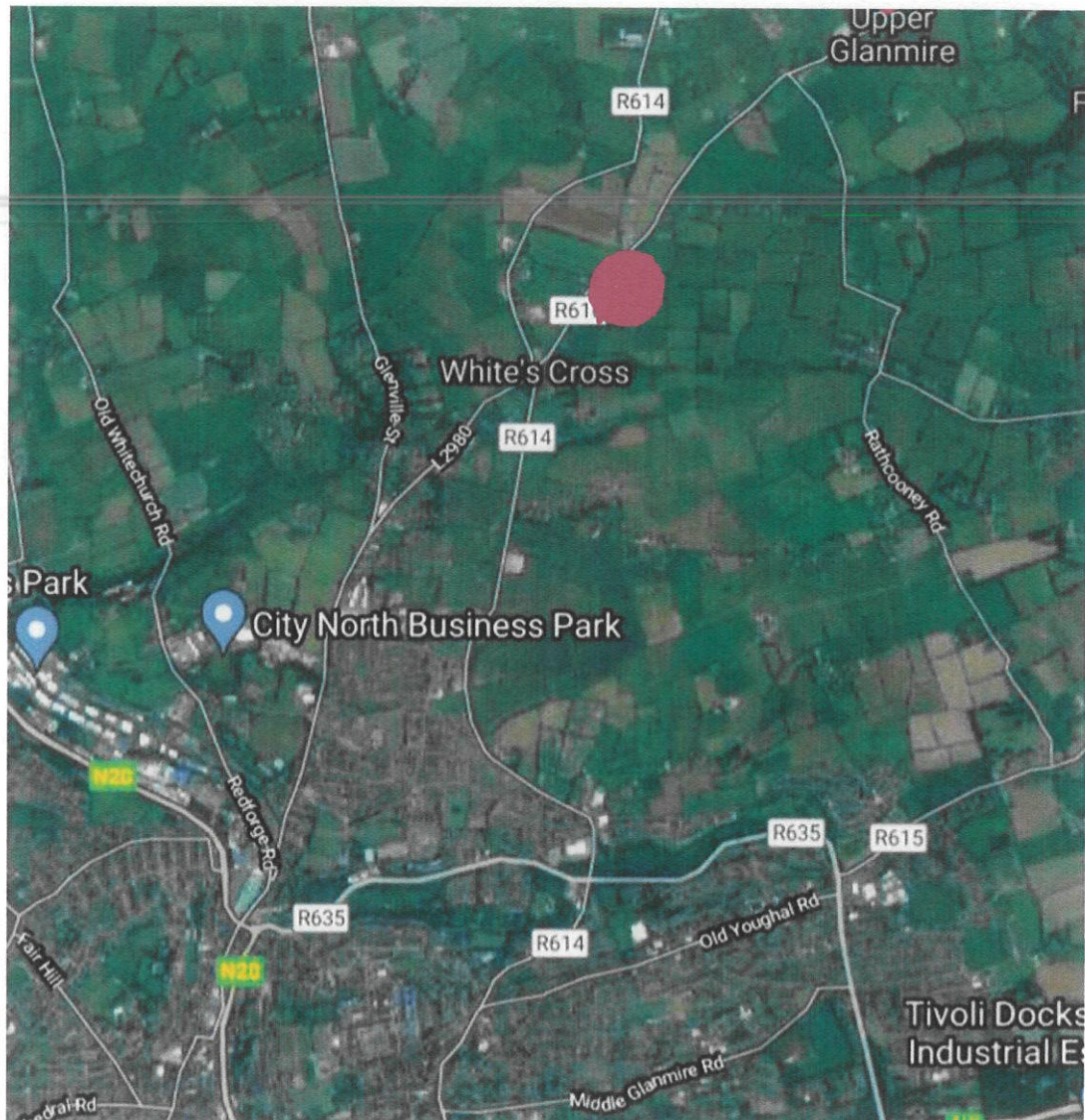


Development Plan Submission



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

Lands at Lisnahorna, White's Cross, , Cork.

On behalf of: Pat Smith

Executive Summary

- This submission is made by Keystone Planning Consultancy Ltd, on behalf of our client, Mr. Pat Smith, 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 28.79 hectares of lands at Lisnahorna, White's Cross, Cork.
- Under the current draft Development Plan the site is zoned ZO 21 "City Hinterland"
- This submission seeks to have these lands designated as ZO 02 'New Residential Neighbourhood'. A copy of the detailed submission is attached.
- Our client is both capable and desirous of developing these lands in the short term
- The development of the site will provide much needed homes at a time of a national crisis in the housing market and offer a substantial increase in amenity space for new and existing communities in the area.

Table of Contents

Executive Summary.....	2
1.0 Introduction	4
2.0 Planning Legislation	6
3.0 Site Location and Description	6
4.0 Planning History	7
5.0 Planning Context	7
5.1 National Planning Context	7
5.2 Regional Planning Context	11
5.3 Local Planning Context.....	11
6.0 Justification and Grounds of Rezoning Submission	13
6.1 Serviceability of the lands	14
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, Pat Smith., Lisnahorna, White's Cross, Cork, wish to make this submission to Cork City Council regarding the Draft Cork City Council Development Plan 2022-2028.

Our client owns approximately 28.79 hectares of lands at Lisnahorna, White's Cross, , Cork. Under the Draft Development Plan, these lands have been zoned ZO 21 "City Hinterland" and this submission seeks to have these lands designated as ZO 02 'New Residential Neighbourhood'. A copy of the detailed submission is attached.

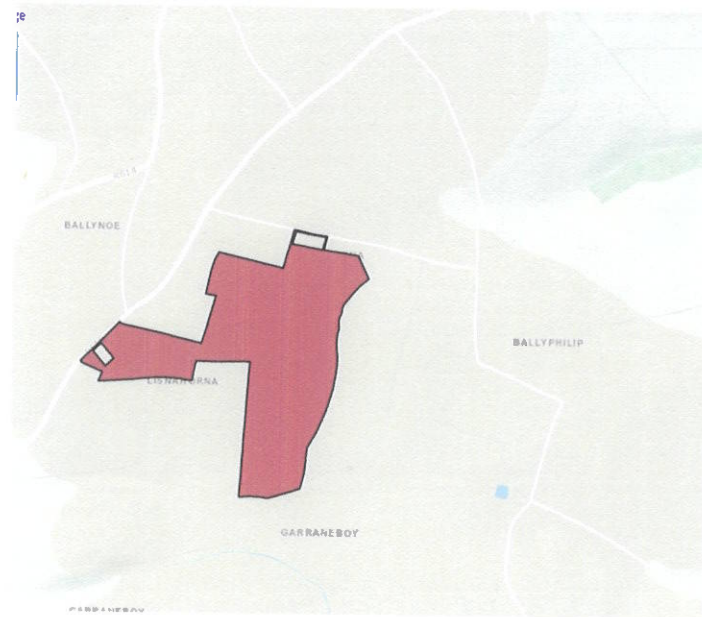


Fig. 1 Site shaded Red

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 2021, as set out on the City Council's website.

This submission requests that the zoning objectives for the subject site be amended to have regard to:

- national and regional planning policy which requires 50% of the projected growth in the housing stock of the Cork Metropolitan Area to be achieved on brownfield land or infill sites within or close to the existing built up area,
- the substantial target for population and housing growth in the suburbs of the City.

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 (4th October 2020) as set out on the City Council's website.

3.0 Site Location and Description

The subject lands, which extend to approximately 28.79 hectares, are located in Lisnahorna, White's Cross, , which is within the functional area of Cork City Council. The site is comprised of agricultural land that may be accessed via Whites Cross and R616.

The subject site enjoys excellent connectivity to the amenities and community facilities within the area. The subject site is a short distance from the centre of Village with all of the facilities which it offers.

The subject site is well supported by schools, recreational areas and sports clubs as well as benefitting from a 10 minute proximity the city itself .

The surrounding built environment is characterised by residential, educational, sporting, (White's Cross and Brian Dillon's GAA Clubs) and recreational developments, (Community Hall and Crunch Gymnasium in Upper Glanmire), with a mix of building types, all of which have resulted in varying building heights and forms within the area.

4.0 Planning History

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

There are no recorded applications on file for the lands in question

5.0 Planning Context

5.1 National Planning Context

Project Ireland 2040: National Planning Framework

In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027. The National Planning Framework (NPF) is "*the Government's 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*".

One of the core objectives of the Plan is that development across the southern region, especially around the cities of Cork, Limerick and Waterford, should act as a counterbalance to the concentration of development in the Dublin region. The Plan

identifies Cork as *"an international centre of scale and is well placed to complement Dublin but requires significantly accelerated and urban focused growth to more fully achieve this role"*.

The overarching emphasis of the NPF is on renewing and developing existing settlements, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. In this regard, the NPF sets a target 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.

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. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *"prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure"*.

"National Policy Objective 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."

"National Policy Objective 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site- based regeneration and increased building heights".

The Plan anticipates growth of between 50- 60% for Cork City and surrounding suburban areas by 2040 which is two to three times higher than the national average. Cork's population is expected to grow by 49,580 within the next 7years

To accommodate this growth the housing output will have to deliver to 3000 units each year during the next City Plan. The Core Strategy suggests that this will be Compact Growth: -

Compact Growth in Cork

3.18

In response to the NPF and the RSES (e.g. RPO 10 Compact Growth in Metropolitan Areas) Cork City Council has ambitious housing targets for brownfield sites, as well as seeking to optimise the supply of housing on greenfield sites. Increasing the supply of housing on brownfield sites is challenging for a broad variety of reasons, including site constraints, complexity and viability). Cork City Council aims to work with landowners, the development industry, state agencies and its other partners to ensure that a substantial supply of housing on brownfield sites is brought to fruition. Cork City Council will seek to unlock suitable brownfield sites with the resources at its disposal.

Thus, at least 50% of that growth in Cork is required to be located within or near to infill or brownfield sites or the existing built up areas. This will enable the sustainable use of currently under-utilised land, with higher housing and employment densities

The Regional Spatial & Economic Strategy for the Southern Region (RSES) states that in order to support the NPF, the distribution of population and employment growth in the city and surrounding metropolitan area must align with public transport investment, and focus on regeneration, consolidation and infrastructure led growth. Targeted growth in the urban area would also support the delivery of the key transport infrastructure outlined in the Cork Metropolitan Area Transport Strategy (CMATS).

The Core Strategy

The Core Strategy accepts that these ambitious goals targets require a doubling of the annual increase in the housing stock from 1,511 to 3,023 units per annum

Year	2022	2023	2024	2025	2026	2027	2028	Total
Homes	1,511	3,023	3,023	3,023	3,023	3,023	1,512	17,118

Table 3.2: Housing Supply targets per annum.

In relation to the area the Draft Plan states: -

<p>City Suburbs</p>	<p>Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.</p>	<p>Ballyvolane, Mahon Blackpool / Kilbarry, North-West Quarter Regeneration area, Old Whitechurch Road. Regenerate underutilised sites in existing neighbourhoods including Mayfield, Douglas, Grange, Togher and Wilton.</p>
----------------------------	---	---

Table 2.5 of the Draft Development Plan

Table 2.2 predicts that the population of the North East Suburbs will grow by 32% from 26,841 to 35,561 from 2016 to 2028.

It is generally accepted that the economic recession that we experienced between the period 2008-2015, caused a significant slowdown in growth and housing output from as far back as 2006/2007. As a consequence, previous housing projections were not met. As is the case throughout the country, but particularly in urban areas, there is significant pent-up demand for housing, including a large number of people on the Council's housing list as well as on the Housing Assistance Payment Scheme (HAPS). In this regard, it is critical that sufficient lands are zoned for residential purposes under the new Development Plan. While lands can be zoned, it is not a guarantee that they will be brought forward for development and thus the Core strategy needs to ensure that there is more than sufficient headroom catered for.

In this regard, while other lands may be zoned for residential use under the current and draft Development Plan, the vast majority of these lands have not and may 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 lands that extend to approximately 28.79 hectares and the subject site can be developed within the lifetime of the proposed Plan and contribute a considerable number of homes to the current effort to deal with the housing shortages. The rezoning of these lands will help to meet some of the unprecedented demand for housing output in the city's suburbs and our Client both capable and desirous of contributing to meeting that need.

Core Strategy 2028: Compact Liveable Growth¹						
Cork City	Baseline Populations (2016)		Future Population Growth (2028)		Actual Population Growth (2028)	
	Existing Population	% of Total Population	Future Population	% of Total Growth	Actual Population Growth	Proportionate Growth Rate
City Centre	22,732	10.8%	26,218	7.0%	3,486	15%
City Centre Regeneration (new build)	--	--	23,945	2.4%	1,213	5%
City Centre Consolidation (re-use)	--	--	2,273	4.6%	2,273	10%
Docklands	1,667	0.8%	7,737	12.2%	6,070	364%
City Docks	1,667	0.8%	7,239	11.2%	5,572	334%
Tivoli Docks	0	0.0%	498	1.0%	498	--
City Suburbs	141,808	66.7%	160,289	37.3%	18,481	13%
North East Suburb	26,841	12.7%	35,561	17.6%	8,720	32%
North West Suburb	23,125	11.0%	23,728	1.2%	603	3%
South East Suburb	51,605	24.5%	58,457	13.8%	6,852	13%
South West Suburb	40,237	19.1%	42,543	4.7%	2,306	6%

We respectfully submit that the provision of a residential development on the subject site in this instance will therefore be in accordance with the NPF's and the Regional planning policies

5.2 Regional Planning Context

The Regional Spatial & Economic Strategy advises that the distribution of population and employment growth in the city and surrounding metropolitan area must align with public transport investment, and focus on regeneration, consolidation and infrastructure led growth. The proposal to develop these lands aligns perfectly with these goals. Positioning development in urban area will also contribute to delivering the transport aims of the Cork Metropolitan Area Transport Strategy).

5.3 Local Planning Context

The subject site is zoned 'City Hinterland' under the current Draft Cork City Development Plan 2022-2028.

City Hinterland Strategy

2.57

The City Hinterland encircles the existing built-up footprint of Cork City, its urban towns and settlements. Its size, character and nature provide a number of very important planning functions:

- Acts as a greenbelt preventing urban sprawl into the surrounding countryside;
- Is rich in biodiversity, ecology and wildlife;
- Provides a valuable range of green and blue infrastructure assets;
- Ensures a distinctive landscape character and setting within the Cork Metropolitan Area; and
- Protects the character and integrity of the city and its urban towns and settlements.

2.59

The primary objective for City Hinterland is to preserve the character of the area generally for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity. Chapter 10 sets out detailed objectives to achieve these aims.

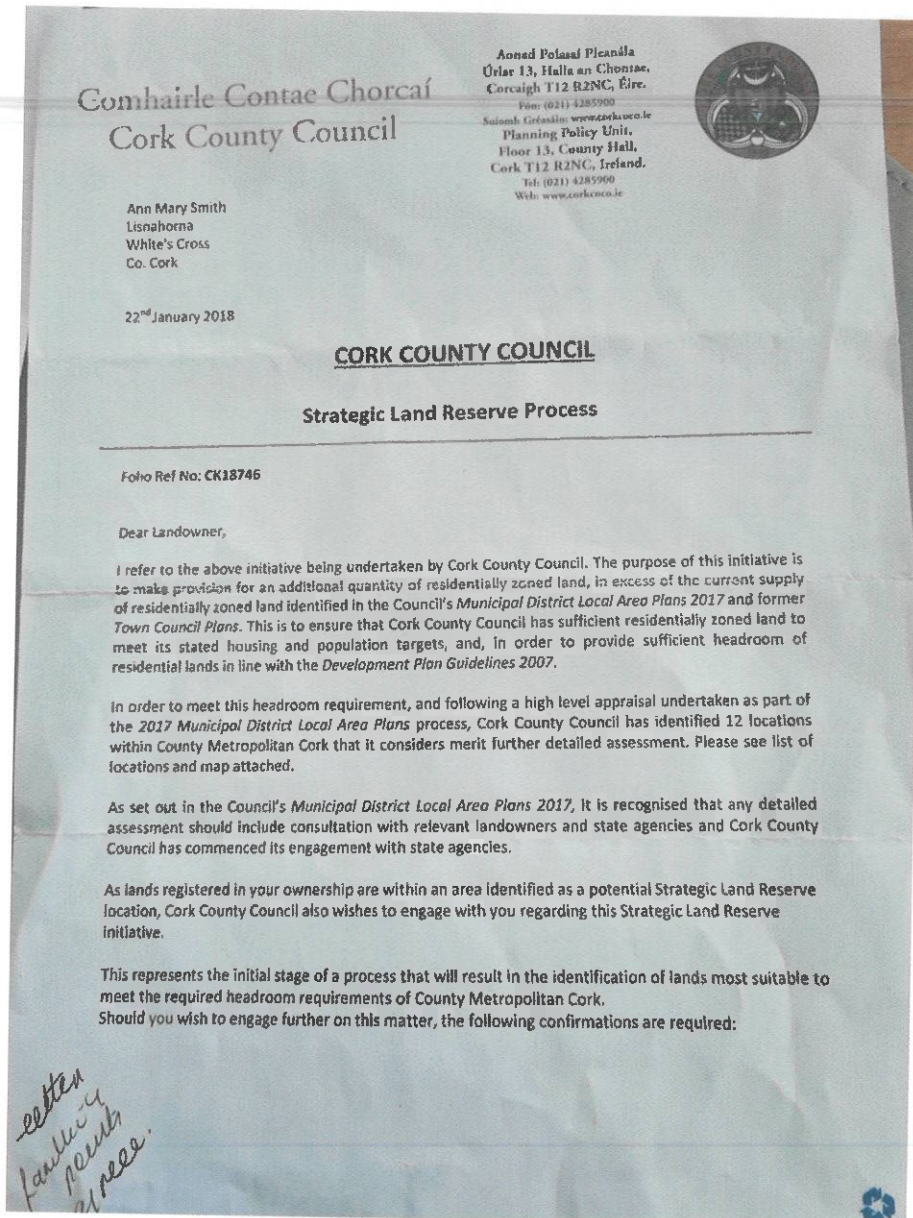
These are laudable policies and should be delivered wherever and whenever possible.

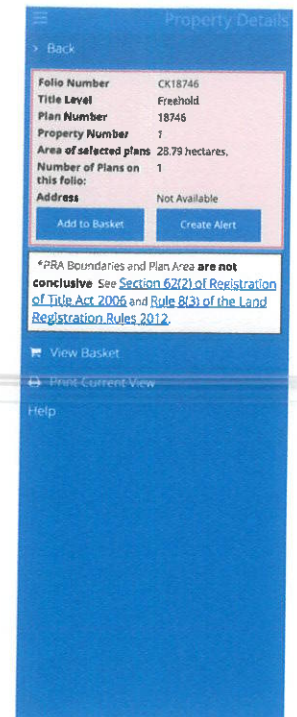
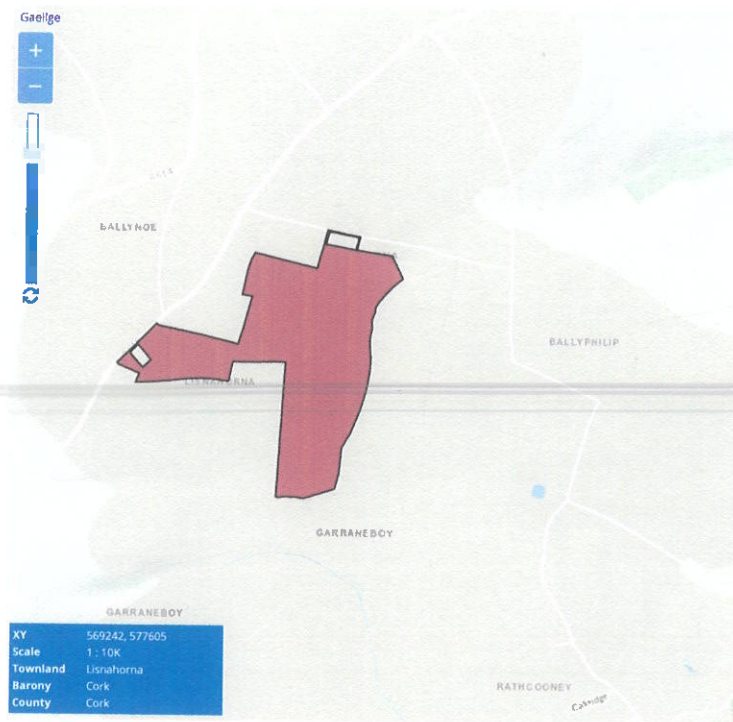
However, with regard to the subject site, its part in contributing to these aims is negligible. In the first instance the lands are in private ownership, and for very understandable reasons, including those of public liability, the public are not permitted to access them. While the lands were used for agriculture Mr. Smith is retiring from farming and none of the family wish to pursue a career in agriculture. Similarly they site will not be used for green or blue infrastructure. Finally, having been farmed for many decades, there is no evidence of any flora or fauna of note on these lands.

Thus while the site has a draft zoning as City Hinterland, in reality it can never fulfil that role.

6.0 Justification and Grounds of Rezoning Submission

The Lands in question are substantial and offer an opportunity to address housing shortfall in the North Eastern suburbs in a meaningful way and were identified by Cork County Council as representing one of 12 locations which were being considered as a Strategic Land Reserve.





6.1 Serviceability of the lands

The subject lands have existing water and foul and surface water drainage infrastructure either on the site itself or adjacent, (Whites Cross) – with capacity to permit development of the scale envisaged.

Sightlines and means of access and egress are all excellent.

7.0 Conclusion

This rezoning of these lands to allow for their future development for housing will: -

- Deliver much needed housing in an area of high demand at a time of serious concern regarding the volumes of housing being delivered by the industry
- The development of these lands constitute a logical extension of the contiguous built-up area of Cork City
- The level of Residential zonings in the current iteration of the Draft Development Plan may not be sufficient to meet the population and housing targets set out at a regional level. This conservative approach, particularly in relation to the volume of City Hinterland designations, may mitigate against the delivery of both a socio-economic and political imperative – the delivery of sufficient homes to address the spiralling cost of putting a roof over one's head.

- The Boundary Extension was intended to allow the city to expand. Whilst acknowledging the importance of green infrastructure and amenity and open space, the volume of City Hinterland designations would seem to sterilise large tracts of land on the periphery of the City – a position that was widely criticised by the city Council when this was County Council policy.
- Make significant public open space available not only to future resident but to the existing communities in Upper Glanmire and Whites Cross.

Our client is the full owner of the 28.79 hectares of lands at Lisnahorna, White's Cross, , Cork and is both capable and desirous of developing them in the short term should the eventual zoning designation permit them to do so.

Section 5 of this submission has identified that the rezoning of the lands to residential use is in accordance with national and regional planning policy. The proposal to designate these lands as City Hinterland, at local level, whilst understandable, will not make these lands accessible to the public and our ecological study suggests that there is nothing on these lands regarding flora and fauna which would set them apart..

We respectfully request that Cork City Council amend the Draft City Development Plan 2022-2028 by changing the zoning on these 28.79 hectares at Lisnahorna, White's Cross, Cork from 'City Hinterland' to "New Residential Neighbourhood'.