



## Executive Summary

- This submission is made by Keystone Planning Consultancy Ltd, on behalf of Mr. Jack Nichol, 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 0.44 hectares of lands at The Stables, Coolroe, Ballincollig, Cork. Under the current Development Plan for the area, the lands are zoned as 'Existing Built Up Area'
- However, under the Draft Development Plan, these lands have been proposed to be rezoned to 'Sports Grounds & Facilities' – presumably because of their proximity to Ballincollig Rugby Football Club. The club does not own these lands. Indeed, the lands are in the private ownership of our Client who is a Founder and current Treasurer of the club, Mr. Jack Nichol.
- Our client is seeking to have this portion of their lands zoned as 'New Residential Neighbourhood', to augment the adjoining lands at The Stables, Coolroe, Ballincollig.
- Our client 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 lands can be readily connected to the existing foul sewer network on the R608.
- Should the lands be zoned as a 'Sports Ground' then it would prevent much needed family homes being delivered in the area, including, potentially, those for social and/or affordable housing.
- The delivery of family homes will help to sustain essential services and retail/commercial outlets in the area.
- The zoning of these lands as 'New Residential Neighbourhood' is in accordance with the policies and objectives of the draft Development Plan and national and regional planning policy.

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## 1.0 Introduction

This submission is made by Keystone Planning Consultancy Ltd, on behalf of Mr. Jack Nichol, and is submitted to Cork City Council in the context of the Draft Cork City Development Plan 2022-2028.

Our client owns approximately 0.44 hectares of lands at The Stables, Coolroe, Ballincollig, Cork. Under the current Development Plan for the area, adopted from Cork County Council's Development Plan 2015-2021 the lands are zoned as 'Existing Built Up Area'. However, under the Draft Development Plan, these lands have been proposed to be rezoned to 'Sports Ground' and this submission seeks to have these lands designated as a 'Residential' land use zoning. A copy of the detailed submission is attached.

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, Mr. Jack Nichol Ltd., Woodstock, Coolroe, Ballincollig, 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. 7<sup>th</sup> October 2020, as set out on the Draft Development Plan's website.

We can confirm that our client is the full legal owner of the lands in question.

## 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 (7<sup>th</sup> October 2020) as set out on the website of Cork City Council.

### 3.0 Site Location and Description

The subject lands, which extend to approximately 0.44 hectares, are located in The Stables, Coolroe, Ballincollig, which is within the functional area of Cork City Council. The lands offer an excellent infill housing opportunity that may be accessed via Regional Road R608.

The subject site enjoys excellent connectivity to the amenities and community facilities within the Ballincollig area. The subject site is 0.75km from the centre of Ballincollig Town (approx. 2 min. cycle/ 7 min. walk), where residents can enjoy the town and the facilities within it.

The subject site is well supported by schools, recreational areas and sports clubs, as well as areas that can provide employment opportunities, such as Ballincollig Town itself, with its retail, hospitality and office environment, and, of course, Cork city itself .

The surrounding built environment is characterised by residential, educational, sporting and recreational developments, (e.g. Ballincollig Regional Park) with a mix of building types, all of which have resulted in varying building heights and forms within the area.



Figure 1. Aerial view of lands subject to this submission (outlined in red)

## 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:

### Subject Lands

There are no records of permissions applied for in respect of this site. However, the surrounding lands have been extensively developed and the infrastructure servicing these developments retains the capacity for the development of this site. There is an excellent roadway and egress point servicing the site with excellent sight lines. Mains water and sewerage infrastructure pass directly in front of the site.

It would appear that the Draft Plan has zoned the site 'Sports Ground & Facilities' in the belief that it may be under the control of the adjacent Ballincollig RFC. We can confirm that the lands are not in the ownership of Ballincollig Rugby Football Club and it has been confirmed to the applicant that the lands in question are of no interest to the Club. This land is not readily accessible from the Rugby Club as both the Club house and changing rooms are located along the short common boundary between both lands

Our Client, a Founder and current Trustee of the Club, Mr. Jack Nichol, is the full owner of the site.

## 5.0 Planning Context

Having set out the location and history of the subject lands, this submission shall now set out the planning context of the subject lands.

### 5.1 National Planning Context

#### Project Ireland 2040: National Planning Framework

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"*.

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 a satellite town, 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. 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”.*

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 provision of a residential development on the subject site in this instance will therefore be in accordance with the NPF’s target of 40% of new housing to be located within existing towns and for 50% of population growth to take place within Ireland’s existing settlements, outside of the five larger cities (i.e. Dublin, Cork, Limerick, Waterford, Galway).

The NPF sets a number of policy objectives that support housing in appropriate locations such as these lands at The Stables, Coolroe, Ballincollig, including:

*“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”.*

### **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.

The Action Plan comprises of 5 key pillars which are addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rented sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- Addressing the unacceptable level of households, particularly families, in emergency accommodation.
- Moderating rental and purchase price inflation, particularly in urban areas.
- Addressing a growing affordability gap for many households wishing to purchase their own homes.
- Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty.
- Ensuring housing’s contribution to the national economy is steady and supportive of

- sustainable economic growth; and
- Delivering housing in a way that meets current needs while contributing to wider objectives
- such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.

The return of the existing zoning for the subject lands to provide for residential development, on lands that are contiguous to existing residential schemes will help the Government to achieve the objectives of the Housing Action Plan. Thus, it is submitted that the proposal is consistent with the policy in this regard.

## 5.2 Regional Planning Context

### Southern Regional Spatial and Economic Strategy (2019)

In relation to Settlement Strategies, regional policies advise that, in preparing Core Strategies for development Plans, Local Authorities should determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region”.

Section 3.1 of the Regional Strategy sets out its Key Strategies:

*The need to provide an adequate supply of quality housing to meet existing and future demand, including addressing the current housing crisis and homelessness;*

- *Invest in and deliver infrastructure to improve the liveability and quality of life of urban and rural areas;*

- *Regenerate and develop existing built-up areas as attractive and viable alternatives to greenfield development;*

It is submitted that the subject lands, which our client is seeking to have designated ‘Residential’, are ideally suited to accommodate a residential development. Its proximity to Ballincollig, the immediate availability of its infrastructural network, its access to excellent amenities on its doorstep and the willingness of its owner to commence development in the short term – all support the proposal for rezoning.

The lands are contiguous to the existing built up area of The Stables, Coolroe, Ballincollig, adjacent to a school and has direct road frontage onto two roads and can connect to all the necessary services and utilities, which are all located proximate to the lands.

## 5.3 Local Planning Context

### Cork City Development Plan 2015-2021

The subject site is zoned ‘Existing Built Up Area’ under the current Cork City Development Plan 2015-2021. Residential use is the primary land use of the wider zone. The objective of such land use zonings are generally taken to primarily include the use of land for domestic dwellings and may also provide for a range of other uses particularly those that have the potential to foster the

development of new residential communities for example, schools, crèches, local convenience retail, doctor/dental surgeries, open space (formal and informal) etc.”

The general objectives for primarily residential areas in Ireland are to provide a measure of protection from unsuitable new development or certain ‘bad neighbour’ developments that would be incompatible with the overall residential function of the area.

Cork City Council, as one of its many objectives, works to implement national housing policy, to ensure that every household that needs it has access to quality, affordable housing in an acceptable environment. Individual housing needs are met through a number of different schemes and initiatives.

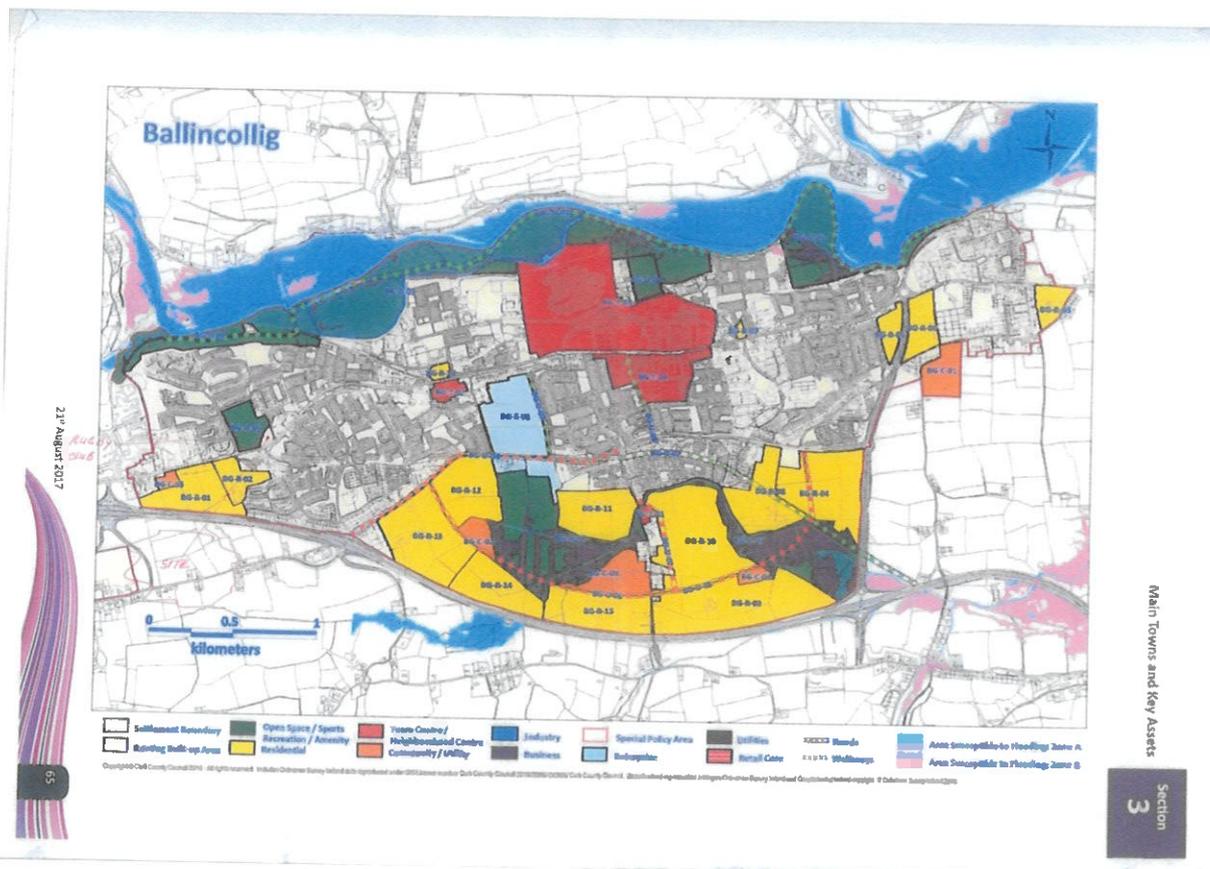
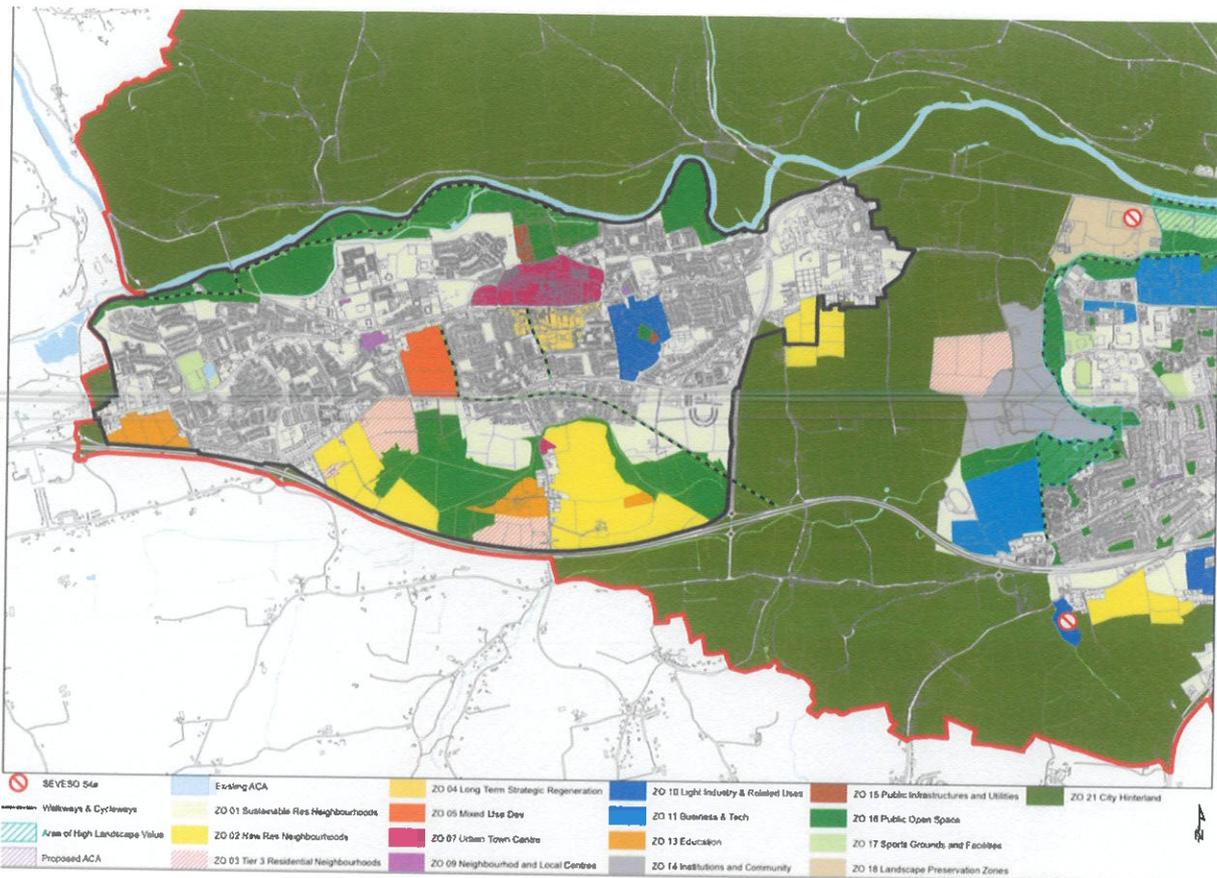


Figure 2. Existing Zoning Map from 2015 Development Plan



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

More specifically, under the current Draft Development Plan, it is an objective of the Council to:



#### SO 2: Delivering Homes and Communities

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.

#### 3.4

This Development Plan period 2022-2028 will see key challenges being tackled in delivering homes and sustainable neighbourhoods across Cork City:

- A significant expansion in housing supply with a focus on bringing zoned sites forward for development within the Plan period;
- A transition to increasing levels of brownfield development in accessible locations to achieve compact growth;
- A shift to a gentle density approach across Cork City and an increase in the proportion of homes that are apartments and duplexes.

- Consolidate and enhance existing neighbourhoods so that they offer an excellent quality of life and the resources essential to ensure consistently high standards. The creation of a 15-minute City required several key issues to be addressed, including connectivity / permeability, GBI, playgrounds, sports infrastructure, nature and public transport;

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### 3.8

A key premise of the 15-Minute City is that people should be able to walk and cycle to access the resources and facilities within their neighbourhood. Not only will this reduce car travel and improve health but most of all it will result in an equity in the Quality of Life of Cork's citizens. Within 15 Minutes of people's home they should have access to: local commercial services (e.g. shops), a creche, a primary school and other community services, a bus stop, open space, a playground and wild-space (nature). The City Council is also locating new employment opportunities in multiple locations around the city to ensure that more people will have the chance of working close to home.

## Delivering Homes

### 3.16

The National Planning Framework and the Southern RSES provide ambitious growth targets for Cork City, as set out in Chapter 2: Core Strategy. The Joint Cork City and Cork County Housing Strategy / Housing Need and Demand Assessment (HNDA) establishes the housing targets for net housing completions for the Development Plan period, informed by the NPF, NPF Roadmap, RSES and the Housing Supply Guidelines (DHLGC, December 2020). These housing supply targets are set out in Table 3.2, below.

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.

### 3.17

In line with the requirements of the Planning and Development Act, 2000 (as amended) Cork City Council will review supply targets in 2024 (the two-year development plan review).

## 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.

### 3.19

Ensuring that small sites are brought forward is essential to regenerating Cork City's neighbourhoods and its historic areas. Small sites also provide the opportunity for self-build, co-operative housing, development trusts, eco-villages and a range of other developer options.

### 3.20

In operating an Active Land Management approach to the optimising the use of land and buildings in the City the Vacant Sites Register, under the provisions of the Urban Regeneration and Housing Act 2015 will identify Residential lands and Regeneration lands. Cork City Council is required to identify

land use zoning types that will be considered to be "Residential lands" and those that will be "Regeneration land". Table 3.3, below, sets out the relevant land use zoning objectives that relate to both categories of land for the purposes of the vacant sites levy.

Residential Land	Regeneration Land
ZO 1-9	<b>ZO 1</b> Sustainable Residential Neighbourhoods
Please refer to Chapter 12, 12.10 Clarification of Residential Uses.	<b>ZO 5</b> Mixed Use Development
	<b>ZO 6</b> City Centre
	<b>ZO 7</b> Urban Town Centre
	<b>ZO 8</b> District Centres
	<b>ZO 9</b> Neighbourhood and Local Centres
	<b>ZO 10</b> Light Industry and Related Uses
	<b>ZO 11</b> Business & Technology

Table 3.3: Vacant sites categorisation.

## Core Strategy & Housing Policies and Objectives

Ballincollig is an urban town that has significant employment and service functions relative to its regional and local catchment, has good regional transport links and has the capacity for continued commensurate growth to become more self-sustaining. It supports the regional driver role of Cork city, and acts as an important local driver providing a range of functions for its resident population and its surrounding catchment including housing, employment, hospitality, services, retail and

leisure opportunities. The town should be encouraged to grow at a sustainable level appropriate to its position in the settlement hierarchy.

It is respectfully submitted that the zoning of Mr. Nichol's lands as 'residential' will contribute to the growth of Ballincollig in a sustainable and commensurate level.

This submission offers the potential to directly underpin the Council's 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 surrounded by existing housing and are immediately proximate to The Stables, Coolroe, Ballincollig. The development of the lands for housing purposes would facilitate compact growth of The Stables, Coolroe, Ballincollig and provide modern housing, including, potentially, social and/or affordable houses. The proposed future development of the subject lands would be designed in a permeable manner.

## **6.0 Justification and Grounds of Rezoning Submission**

This planning submission proposes to have the lands identified as 'Residential'

Keystone Planning have set out in Section 5 of this report how the proposed rezoning of the subject lands would be consistent with national, regional and local planning policy. Notwithstanding this, Keystone Planning shall now set out further justification regarding the grounds of this rezoning submission.

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

The site benefits from excellent infrastructural services.

### **6.2 Failure of Previous Core Strategy to Deliver Required Housing**

It is generally considered to be universally accepted that the economic recession that Ireland experienced between the period 2008-2015, with a significant slowdown in growth and housing output from as far back as 2006/2007, that the previous housing allocation figures set out in previous Development Plans were difficult to attain. It is noted that there is significant demand for housing in the Ballincollig area, 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 Development Plan, when adopted, must 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 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, a sizeable area of land is available and the subject site is a 'ready-to-go' site

with all the necessary infrastructure available to the site. The rezoning of these lands will help to meet some of the published shortfall in the housing output in the wider city and Mr. Nichol is about to commence the planning process for the lands with Section 247 pre-planning consultation and the Pre-Connection Enquiry submitted to Irish Water. It is the intention of Mr. Jack Nichol to finalise and submit a planning application at the earliest opportunity.

### **6.3 Integration with the wider The Stables, Coolroe, Ballincollig area**

The site is in private ownership. As such it cannot be considered as amenity space. A development here will integrate with the wider development of the Stables to the north and can offer a more typical suburban housing estate style of development as opposed to the existing layout while offering a choice of house types.

### **6.4 Delivery of Housing**

As stated previously, Mr. Nichol has a proven track record in project management and is in a financial position to deliver much needed housing on the subject lands, pending a grant of planning permission

Our client wishes to deliver a range of housing types that are commensurate with the local environment and setting.

### **7.0 Conclusion**

Mr. Jack Nichol Woodstock, Coolroe, Ballincollig, Cork, wishes to make this submission to Cork City Council regarding the Draft Cork City Council Development Plan 2022-2028.

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:

- The lands are not in the possession of Ballincollig RFC and the Rugby Club have no interest in acquiring them. This land is not readily accessible from the Rugby Club as both the Club house and changing rooms are located along the short common boundary between both lands
- As the lands are in private ownership they are of no value as 'amenity' or 'open space'
- The site has excellent infrastructural services
- It is located on a public service bus route
- It meets the 15 minute criteria for retail and comparison shopping, schools and all essential services
- The site is in close proximity to a regional park and excellent sports and playing grounds

Should the lands be zoned as a 'New Residential' then it would offer much needed family homes in the area, potentially including those for social and/or affordable housing. The delivery of family homes will help to sustain essential services and retail/commercial outlets in the area.

The zoning of Mr. Nichol's lands as 'New 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. Cork City Development Plan 2022-2028, by changing the zoning objective for the subject lands

from "Sports Ground & Facilities" to "New Residential", will be entirely commensurate with National and Regional policy.

In light of this, Keystone Planning respectfully request that Cork City Council amend the Draft Cork City Council Development Plan 2022-2028 accordingly.