

Development Plan Submissions
Strategic and Economic Development
Cork City Council
City Hall
Anglesea Street
Cork
T12 T997

4th October 2021

**RE: SUBMISSION IN RESPECT OF LANDS AT STONEVIEW AND RINGWOOD, BLARNEY WITH REGARD
TO THE DRAFT CORK CITY DEVELOPMENT PLAN 2022-2028**

Dear Sir/Madam,

We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, are instructed by our clients, Elkstone and the Forrest Family, to make this submission to the Draft Cork City Development Plan 2022-2028 in respect of lands at Stoneview and Ringwood in Blarney, Cork City.

The Forrest Family own the Ringwood Development Area and Elkstone Ltd. own the eastern part of the Stoneview Urban Expansion Area. Both landowners are now in a position to deliver the development of these lands in Blarney in tandem with upgrades to the local public transport network having established a credible and well funded approach to the masterplanning and delivery of new homes.

This submission letter is accompanied by a Masterplan document addressing the development potential of both these designated urban development areas.

The Masterplan sets out a detailed technical response to the lands' location and character, the current and proposed planning policy provisions pertaining to them, from a national to local level, and the development opportunities and constraints arising as a result of same.

Our overall submission requests the Planning Authority, as one of the key stakeholders in the development of both these urban expansion areas, to respond positively to the matters evolving in the Masterplan and the solutions found to address same. In this regard, a number of changes to the policies and objectives set out in the Draft City Development Plan for Stoneview and Ringwood are put forward for consideration.

Our clients put forward a credible plan for the delivery of homes within the lifetime of the new Cork City Development Plan which will incorporate a sustainable approach to travel, landscape and sensitivity of the local context.

Current national, regional, and local planning policy in place for Blarney are all strongly supportive of the delivery of new housing in Blarney. The National Planning Framework's National Policy Outcomes 1b and 5 place an onus on local authorities like Cork City Council to help deliver substantial population growth in the southern region, and in Cork City in particular.

It is respectfully requested that the draft land use zoning is amended to respond to the constraints and opportunities identified in the enclosed Masterplan, and that Blarney is allocated additional residential units in order to deliver the provision of a mixed-use development supported by a new rail station and associated Park and Ride facility at Stoneview.

This approach will support Cork City Council in delivering on its housing targets in a sustainable manner.

Significant amendments have been made to previous iterations of masterplanning for expansion of the town of Blarney, in summary:

1. Location of the new rail station is more central, with the station providing for 4 tracking and increased connectivity for existing and future residential and employment uses;
2. Reduced reliance on the N20 – Stoneview no longer requires direct access from the national road network to function and includes access to the proposed Park and Ride facility via Blarney Business Park, which will encourage modal shift regarding the commuter rail service, thereby reducing vehicular traffic on the N20;
3. Centralised development between the new rail station and the existing Blarney town, with early phases of development concentrating on sequential development of the existing town at Ringwood;
4. Inclusion of a new Town Park for Blarney, enhancing the green infrastructure network of the town with linkages to the Clogheenmilcon wetland walk to the south and Cork City Council's proposals for pedestrian and cycling routes along the River Martin to the west;
5. Reduced requirement for upgraded infrastructure – the expansion of Blarney no longer requires a new N20 interchange and Irish Water have indicated that development in accordance with the Masterplan can be delivered without additional upgrade to water services.

Our clients very much welcome the publication of the Draft Cork City Development Plan 2021 and would be grateful for an opportunity to further discuss matters set out in this submission with the Council's Plan preparation team.

It is trusted that it will be seen as a constructive and productive contribution to the preparation of the final Cork City Development Plan, and, in this regard, we request that it is given favourable consideration.

Overview

Under the Draft Cork City Development Plan 2022-2028, the subject lands are proposed to be zoned partly as ZO 02 “New Residential Neighbourhoods”, partly as ZO 03 “Tier 3 Residential Neighbourhoods”, and partly as ZO 16 “Public Open Space”.

The areas zoned ZO 02 largely correspond with Tier 2 lands as identified on the Draft City Development Plan’s Growth Strategy Map, and the areas zoned ZO 03 correspond, in the main, with Tier 3 lands.

Portions of the subject lands to the north-west and south-east in Stoneview and including the Ringwood and areas immediately to its south, are identified as neither Tier 1 nor Tier 2 but as being suitable for compact growth in the Growth Strategy Map.

Under Cork County Council’s *Blarney Macroom Municipal District Local Area Plan 2017*, the lands currently have a number of site-specific residential, town centre, open space, and community land use zoning objectives, as well as several roads/infrastructure zoning objectives also.

Our clients welcome the principle of the draft residential and public open space land use zoning objectives for the subject lands. They wish to submit points in relation to the detailed articulation of these on their lands. These we will address later in this submission.

Firstly, we address the high level strategic planning response to the development of Blarney as set out in the Draft Development Plan, which we believe to demonstrate significant departure from established national and regional level planning policy provisions.

Blarney – Planning Policy Development

We would like to draw the Planning Authority’s attention to the context in which the current national, regional, and local planning policy for the development of Blarney was arrived at.

Beginning with the CASP in 2001, Blarney has long been identified as a suitable location for significant population growth owing to its location along the Cork-Mallow/Dublin rail line. Since the publication of the CASP, the significant potential of Blarney to play a strategic role in the growth and development of the Cork Metropolitan Area (CMA) has been reflected in an abundance of statutory and non-statutory plans, including:

- The *South West Regional Authority – Regional Planning Guidelines* (2004), which supported the delivery of a new rail station and Park and Ride facility at Blarney, in line with the CASP;
- The Cork County Council *Blarney-Kilbarry Special Local Area Plan – 2005*, which was premised on the findings of the *Cork Suburban Rail Feasibility Study* (2002) and sanctioned the creation of a Masterplan to guide significant new residential development in tandem with a new rail station at Stoneview;

- The non-statutory *Masterplan for Lands at Stoneview Blarney County Cork*, adopted by the County Council in 2006 to guide the phased delivery of a major new residential neighbourhood at Stoneview supported by major new infrastructure including a new rail station;
- The 2008 CASP Update and the *South West Regional Authority – Regional Planning Guidelines 2010-2022*, which both re-emphasised the significance and appropriateness of Blarney as a location for major population growth and development given its location along the metropolitan rail line;
- The *Blarney Electoral Area Local Area Plan 2011*, which placed a significant emphasis on the development of Stoneview as a new neighbourhood on the rail line, so much so that it formed part of the vision for Blarney town as a whole.

Draft Plan Misalignment with National Planning Policy Objectives

In the context of the history above, our clients are of the opinion that the Core Strategy, Housing Strategy, Growth Strategy, Transport and Mobility Strategy, specific development objectives for Blarney (and the subject lands in particular), and land use zoning objectives applied to the subject lands and other lands in Blarney under the Draft Cork City Development Plan betray a profound disconnect between, in the first instance, the principle versus the substance of the draft local planning policy for Blarney and the subject lands and, in the second instance, between the substance of the draft local policy and the established national, regional and subregional policy in place for same.

The disconnect is centred fundamentally around, on the one hand, Blarney's location on the rail network and the established planning policy principles and objectives in place at national and regional level to exploit this location so as to ensure a strong alignment between land use and transportation across the country's urban areas and, on the other hand, the Draft Development Plan's failure to properly align with these well known policy aspirations.

At a national and regional level, the current Government's plan is to develop the Cork Commuter Rail Network, which has received a funding allocation of €164m from the EU as well as publicized endorsement from the President of the European Commission, Ursula von der Leyen¹.

In May 2021, Cork City Council Director of Services Fearghal Reidy also confirmed that discussions were ongoing with Irish Rail and the National Transport Authority in relation to the Cork Commuter Rail Network and that the appointment of consultants to help deliver Cork's commuter rail plan was imminent².

The 2018 *National Planning Framework* (NPF) sets out the long-term spatial development strategy for Ireland up to 2040. This national policy document informs the policy context for regional and local plans, which must align with the NPF as set out in the Planning and Development Act, 2000 (as amended).

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_21_3727

² <https://www.irishexaminer.com/news/munster/arid-40290341.html>

The NPF is guided, in part, by the aim of achieving regional parity in the country by significantly growing the population of both the Southern Region and the Northern and Western Region over the next two decades to counterbalance the dominance of the Greater Dublin Area. Regional parity is considered necessary to address social and economic imbalances in the country.

In relation to Cork, the NPF sets a population growth target of at least 50-60% for Cork City and its suburbs by 2040. This is to facilitate Cork becoming a city of scale so that Cork can become competitive with Dublin, as well as with other comparable European and UK cities of similar scale.

These population growth projections equate to approximately 324,000 people living and working in the city and suburbs and will mean enabling the city to grow by twice as much to 2040 as it has over the past 25 years. The NPF contains a number of specific National Policy Objectives (NPOs) in this regard: NPO 1a; NPO 1b; NPO 2a; NPO 3b; NPO 5; NPO 11; NPO 32.

The preferred spatial development approach contained in the NPF is to provide as compact an urban environment as possible through consolidating and densifying future urban growth and development within and contiguous to existing settlements and their built-up footprints. NPF National Strategic Outcome 1 "Compact Growth" is explicit in this regard.

One of the key future growth enablers for Cork outlined within the NPF is to progress the sustainable development of new greenfield areas for housing, especially those on public transport corridors.

NPF National Strategic Outcome 4 "Sustainable Mobility" is aimed at facilitating a move away from polluting and carbon intensive propulsion systems towards new technologies, as well as facilitating an increase in the patronage of public transport and supporting modal shift towards greater levels of walking and cycling as transport mode choices.

Meanwhile, NPO 7 of the NPF advocates for, amongst other things, addressing the legacy of rapid unplanned growth by facilitating improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes.

Contrary to all of the above policy objectives and in contrast to other settlements in the CMA, and despite a 20-year wealth of planning policy supporting significant population growth in Blarney due to its location along the rail line, Blarney has experienced only very marginal growth over the past 20 years – between 2002-2016, the population of Blarney increased by just 393 people (18.1% of its 2002 population).

This contrasts with other metropolitan towns such as Ballincollig, which is not located on the Cork Commuter Rail Network, but which had almost 9 times as much growth over the same period, with a population increase of 3,502 (23.2% of its 2002 population).

The policies and objectives set out in the Draft City Development Plan, in severely and unduly restricting short to medium term development in the urban town of Blarney, would appear to us to exacerbate this continued failure

to align population and housing growth in the CMA with established urban locations on the Cork Commuter Rail Network.

This failure undermines the Strategic Vision of the Draft City Development Plan and several of the Plan's Strategic Objectives (SO): SO 1 – Compact Liveable Growth; SO 2 – Delivering Homes and Communities; SO 3 – Transport and Mobility; SO 4 – Climate and Environment; SO 9 – Placemaking and Managing Development.

Draft Plan Misalignment with Regional Planning Policy Objectives

The *Regional Spatial and Economic Strategy for the Southern Region* (RSES) was formally adopted in January 2020 and sets out a twelve-year development plan for the Southern Region based on the strategic objectives of the NPF. The strategy acknowledges that, by 2040, it is likely that the population of the region will grow by 380,000 people to almost two million and that Cork is projected to be one of the fastest growing areas in the state over the next 20 years.

According to the RSES, progressing the sustainable development of new housing in Blarney is a significant enabler for the CMA. One of the key principles guiding the RSES is the need to provide adequate quantities of quality housing for existing and future housing demand in locations that are accessible to employment and services, and which are located along sustainable and public transport corridors. Three RSES Regional Policy Objectives (RPOs) support this principle:

- RPO 8 b., which is aimed at prioritising the delivery of compact growth and sustainable mobility the Metropolitan Areas in accordance with NPF objectives;
- RPO 9, which is aimed at ensuring a holistic approach to delivering infrastructure including investment and delivery of comprehensive infrastructure packages, such as water services and transport and sustainable travel, to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF;
- RPO 10, which addresses the issue of compact growth and commits to the prioritisation of housing and employment development in locations within and contiguous to existing city footprints which can be served by public transport, walking, and cycling.

A failure to allocate an appropriate proportion of new populations in the City to Blarney in favour of allocations to other greenfield locations not on the commuter rail line, to us, conflicts with all of the above regional planning policy provisions, and with the RSES vision for the development of the CMA.

Draft Plan Misalignment with Local Planning Policy Objectives

Included in the RSES for the Southern Region is the Cork Metropolitan Area Strategic Plan (MASP). The MASP aligns with policies and objectives contained within the NPF.

The top goal of the Cork MASP is to guide development in the CMA under a “Sustainable Place Framework”, which is defined by a network of compact metropolitan settlements that are:

- interconnected with sustainable public transport, pedestrian and cycling networks;
- high quality places to live and work, the achievement of which may involve the retrofitting of existing hard and social and community infrastructure;
- to be subject to infrastructure-led development, where housing and job provision are integrated with high quality sustainable transport as well as social and community infrastructure, public realm, recreation, and amenities.

In the MASP, Blarney is specifically identified as being one of the Metropolitan Towns that requires consolidation, regeneration, and infrastructure-led growth and investment regarding housing.

Accordingly, the MASP cites the development of a new commuter rail station and Park and Ride facility in Blarney as some of the key transport priorities for the CMA. Cork MASP Policy Objective 8 is explicit in this regard.

Section 7.3 of the MASP states that Blarney is a Strategic Residential Growth Node on the Metropolitan Rail Line. As such, Blarney includes an Urban Expansion Area (UEA) at Stoneview. UEAs were first identified in the 2001 *Cork Area Strategic Plan (CASP)* as the optimum locations for the development of new communities in the CMA.

The MASP states the indicative residential yield at Blarney is 3,555 units (including 2,600 units at Stoneview UEA) up to 2031. Amongst the infrastructure priorities listed alongside Blarney’s residential yield in the MASP are the implementation of Stoneview UEA phased infrastructure packages, upgrades to the wastewater and potable water supply infrastructure of Blarney, and the redevelopment of Blarney’s rail station (which closed for passenger use in 1934 and closed for freight in 1963).

Under the 2020 *Cork Metropolitan Area Transport Strategy (CMATS)*, new walking, cycling, and local road links, as well as a BusConnects service, are planned for Blarney to, in part, support the development of Stoneview in particular.

CMATS also states that the development of a new rail station at Stoneview aligns with the strategic land use planning objectives of both Cork City Council and Cork County Council, is necessary to support sustainable growth along an enhanced railway corridor on the Cork-Mallow rail line and will support primarily residential-led mixed use development in the vicinity.

The Core Strategy of the *Cork County Development Plan 2014* is explicit about maximising new residential development along the Cork Commuter Rail Network at Blarney. Meanwhile, the *Blarney Macroom Municipal District Local Area Plan, 2017 (LAP)* involved a review and incorporation of aspects of the 2006 Masterplan. In addition to the masterplanned lands at Stoneview, the LAP also identifies an “Area for New Residential Development” at Ringwood, to the east of the town and immediately adjacent to the existing development boundary, which was deemed as being required to satisfy the projected growth for the town.

Paragraph 2.3.97 of the LAP states the following regarding the Ringwood site:

The development of these lands in close proximity to Blarney town centre, the Stoneview Urban Expansion Area and the suburban rail network offers the opportunity to achieve high modal shift. Delivering the development of these lands and associated road/rail infrastructure is part of the Cork County Councils development framework for Metropolitan Cork. Therefore these lands have been identified as an Area for New Residential Development and the plan sets out a clear pathway for the future development of the Ringwood site.

In 2011, the population of Blarney was 2,437 and the current County Development Plan's population target for Blarney by 2022 is 7,533, such is the strategic significance of Blarney. To accommodate this targeted population growth of the town, 2,566 additional housing units are required over the period 2011-2022.

However, as the end of 2021 and of the lifetime of that plan approaches, only a fraction of these new homes have been delivered³ and, consequently, only a fraction of that population growth has occurred – in 2016 Blarney had a population of just 2,539.

It is submitted that the new Cork City Development Plan should respond coherently and comprehensively to reversing these trends. We are concerned that the Draft City Development Plan does not appear to do this by virtue of the fact that inconsequential population, housing, and zoning targets have been set out for Blarney, compared to other urban locations. This will aggravate the problem in that it fails to make full use of the very real opportunity to fully align new population growth with public transportation networks in Blarney.

The inconsequential housing targets and corresponding zoning for Blarney contained in the Draft Plan are also entirely at odds with the population growth and housing targets for Blarney contained in the Cork MASP, as well as the MASP's transport strategy, which is integrated with its land use strategy.

Under Section 10(2)(n) of the Planning and Development Act, 2000 (as amended), the Planning Authority is obliged to include mandatory objectives for the promotion of sustainable settlement and transportation strategies in urban and rural areas in the interests of reducing energy demand, reducing anthropogenic greenhouse gas emissions, and addressing the necessity to adapt to climate change. Under Section 15 of the Act, the Planning Authority is also under a general duty to secure this and other objectives of the Development Plan.

We submit that the objectives and policy contained in the Draft City Development Plan in respect of the sustainable development of Blarney as a major growth location along a rail line are inadequate, insubstantial and will be wholly ineffective.

³ Table 3.2 of the 2017 LAP highlights that between 2010-2015, the number of residential units in Blarney increased by just 9 units. A development of 88no. houses has since been constructed under Planning Register Reference: PL04.248614 (16/07122), which represents just 3.4% of the required homes as envisaged under the current County Development Plan and LAP.

Consideration of Draft Joint Housing Strategy

In accordance with both the requirement under Part V of the Planning and Development Act, 2000 (as amended) for local planning authorities to prepare housing strategies and the requirement in the NPF for local planning authorities to prepare a Housing Need Demand Assessment (HNDA) to support their housing strategies, the *Draft Cork Joint Housing Strategy (JHS)* was commissioned by both Cork County Council and Cork City Council to inform the core strategies of their respective development plans (both currently undergoing the statutory process of review) regarding population growth and new residential development. The JHS is a constituent part of the Draft Cork City Development Plan.

The HNDA contained in the JHS finds that 39,106 additional households are anticipated in Cork County up to 2028, with 17,119 in the city proper and 13,939 additional households anticipated in the County Metropolitan Strategic Planning Area.

The Office of the Planning Regulator (OPR) made a submission earlier this year on the *Draft Cork County Development Plan 2021* requiring that Cork County Council revise the Core Strategy of their Draft Development Plan, including the population and housing projections for the 6-year period of the Plan, so that the projections align with national and regional planning policy and with the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities* (2020). With both Cork County and Cork City Councils having commissioned the JHS to base their respective core strategies and housing and settlement strategies upon, it remains to be seen whether the OPR will make a similar request of Cork City Council.

The table below depicts the targeted distribution of population growth throughout the CMA, as currently envisaged in the JHS. Of note is that: Ballincollig has over 80% of its RSES Indicative Unit Yield up to 2031 target allocated for the period up to 2028; Cork City Suburban Areas have been allocated over 77% of the RSES 2031 indicative yield; Glanmire has been allocated 139% of that indicative yield; and the City Centre 138%. Meanwhile, in contrast to that trend and contrary to regional policy and current local policy, Blarney has been allocated just 18% of that yield.

Table 1. Distribution of Targeted Population Growth in Cork City, Regional Spatial and Economic Strategy for the Southern Region and Draft Joint Housing Strategy.

Location		RSES Indicative Unit Yield up to 2031		Indicative Residential Yield up to 2028 (Units)	Percentage of RSES 2031 Indicative Yield provided for under the JHS up to 2028
City Docks		9,500		3,013	31.7%
Ballincollig		4,582		3,750	81.8%
Cork City	North Environs	4,550	+ 175 for City Hinterland	7,355	77.2%
	Suburban Areas	Mahon		1,021	
		Cork City Suburban Areas		3,986	
		North West Regen Area		200	
Blarney		3,555		641	18%
Tivoli		3,000		200	6.7%
Glanmire		1,567		2,179	139%
City Centre		1,014		1,400	138%
Tower		N/A		189	N/A

Under the Draft City Development Plan, Blarney is described as 1 of 4 Urban Towns. Combined, these 4 Urban Towns have been allocated a total population target of 54,650 up to 2028 in the Core Strategy, as informed by the JHS.

The table below compares the target growth strategies over time for the 4 Urban Towns, highlighting Blarney as the only Urban Town where a reversal of historic population growth targets is envisaged over the lifetime of the next City Development Plan.

Table 2. Draft Population Growth Targets for Cork City Urban Towns

Location	Census 2011 Population	Census 2016 Population	Cork County Development Plan 2014 Projected Population by 2022	Draft Cork County Development Plan 2021 and Draft Cork City Development Plan 2022-2028 Projected Population by 2028
Ballincollig	17,368	18,159	23,805	29,003
Blarney	2,437	2,550	7,533	5,881
Glanmire	8,924	9,903	10,585	15,329
Tower	3,306	3,421 ⁴	Unknown	4,437

This clearly illustrates that the population growth target for Blarney in the Draft City Development Plan is entirely at odds with national and regional policy and objectives for the compact, sustainable growth of Cork which includes the realisation of the potential of Blarney to accommodate a significant proportion of this growth owing to its location along the suburban rail line.

Consideration of Detailed Draft Plan Planning Policy Provisions

Some of the Strategic Objectives of the *Cork City Draft Development Plan 2022-2028* Core Strategy include:

- SO 1 – Compact Liveable Growth, which is aimed at delivering compact, walkable neighbourhoods at locations which include strategic greenfield expansion adjacent to the existing city;
- SO 2 – Delivering Homes and Communities, which is aimed at providing densities and a mix of typologies, linked to active and public transport infrastructure;
- SO 3 – Transport and Mobility, which is aimed at ensuring integrated land-use and transportation planning to increase active travel and public transport usage and at facilitating the delivery of the objectives of CMATS;
- SO 4 – Climate and Environment, which is aimed at reducing the carbon footprint of the city through, amongst other matters, developing sustainable transport infrastructure.
- SO 9 – Placemaking and Managing Development, which is aimed at managing the design-led development of walkable, attractive, compact, connected city neighbourhoods and communities.

⁴ The Draft Cork City Development Plan 2022-2028 states the Census 2016 population of Tower incorrectly as 3,274. The correct figure is 3,421 (Please refer to the CSO's webpage: "Census 2016 Sapmap Area: Settlements Tower").

The Masterplan document included as part of this submission demonstrates that the development of the subject lands as a major new residential neighbourhood along the Cork Commuter Rail Network fully aligns with these Strategic Objectives and, as such, should be prioritised in the new City Development Plan.

However, the Core Strategy states that the development of Stoneview to contribute towards the strategic growth of Cork is considered to be a longer-term objective up to 2040.

Thus, while the Transport and Mobility Chapter assures the reader that maximising the potential of the Cork suburban rail network is a priority for Cork City Council, the chapter also simply states that the provision of new rail stations at Blackpool, Blarney, and Tivoli *"is consistent with Cork City Councils policy and objective to significantly intensify development around these locations"*.

Such a statement lacks the specificity required to ensure the timely delivery of these stations and lacks commitment on the City Council's part to adequately support and encourage the timely delivery of compact, sustainable growth along the Cork Commuter Rail Network within the lifetime of the new City Development Plan.

The housing crisis and associated homelessness crisis both intensified in 2014 and have remained acute national issues ever since, with no indication of them easing any time soon. Therefore, supporting housing supply is of paramount importance for Irish society, including the population of Cork City. In addition, the climate crisis has been worsening for several decades, where the onus on society to reduce carbon emissions through, amongst other measures, encouraging and supporting modal shift to public and active modes of transport is clear.

The fact that policy has been in place for two decades to support such modal shift by delivering a new compact residential neighbourhood along the suburban rail line at Blarney which has yet been unrealised due to the failure to provide the necessary supportive public infrastructure is lamentable for society, the economy and from an environmental perspective also.

The Core Strategy of the Draft City Development Plan emphasises the need for infrastructure-led growth and contains Objectives 2.3 and 2.5, which prioritise such in terms of delivering on projects supported by the National Development Plan and regional investment initiatives.

Yet, the Draft City Development Plan fails to tackle this issue in a meaningful or comprehensive sense in terms of encouraging the timely development of Stoneview and Ringwood in Blarney.

We note the following objectives of the Draft City Development Plan contained in Chapter 10:

- Objective 10.61 – *"To support the compact growth and development of Blarney East / Ringwood Expansion Area as a strategic City consolidation and expansion area"*, with Blarney East/Ringwood being identified as one of seven such strategic areas for consolidation and expansion.

The other strategic consolidation and expansion areas are: South Ballincollig; East Ballyvolane; West Ballyvolane; South Glanmire; Blackpool (Kilbarry); Douglas (Castletreasure). With the exception of Blackpool (Kilbarry), none of these other areas are located along the existing infrastructure of the

metropolitan rail line and thus Blarney and Blackpool (Kilbarry) are the only locations with the realistic potential to deliver sustainable suburban rail-oriented residential development at scale.

- Objective 10.62 – which is to prepare a Framework Masterplan for Blarney Town Centre, but which is worded identically to Objective 16.1;
- Objective 10.63 – to prepare a Framework Masterplan for “*transit-oriented mixed-use and residential development Stoneview*” during the lifetime of the plan;
- Objective 10.64 – to deliver high quality public transport for the Blarney/Tower /Kerry Pike area in collaboration with the NTA and transport providers.

We note with concern that Irish Rail is not referred to explicitly in this objective and that Tower and Kerry Pike are not located along the Cork Suburban Rail Network.

We further note that the majority of Stoneview and a large portion of Ringwood have draft zonings as Tier 3 residential land. Meanwhile, we note that lands zoned for New Residential Neighbourhoods inside the south-western development boundary of Blarney are identified as being Tier 1 lands on the Growth Strategy Map (Figure 2.21 of the Draft City Development Plan) and are indicted on that map as the location for a City Expansion Area. This is despite the fact that southern parts of these lands are in a flood risk zone, and despite the fact that it is Stoneview and Ringwood to which current local and regional policy refer in terms of the urban expansion of Blarney.

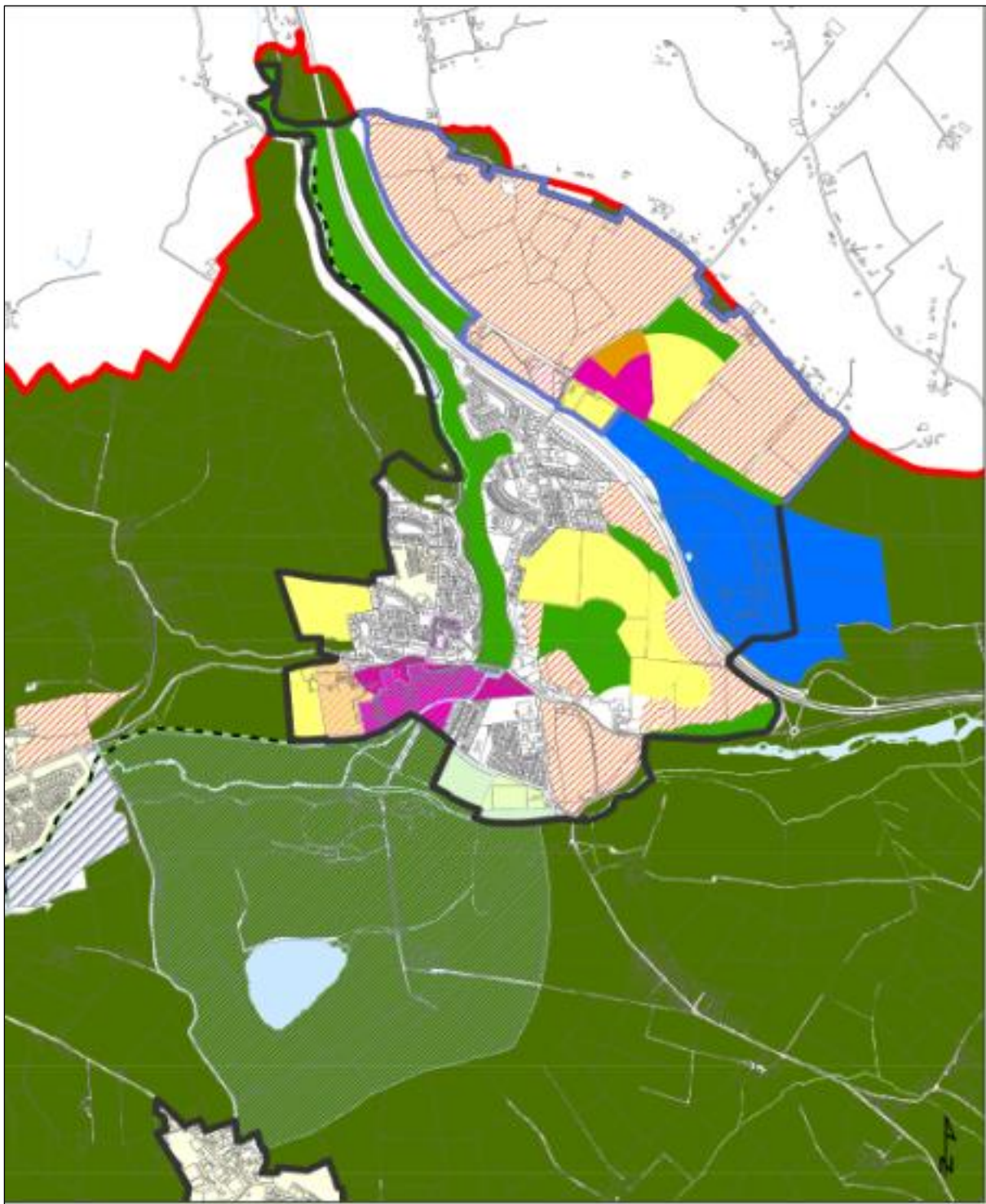
Section 12.13 of the Draft Plan explains that Tier 1 lands are zoned, serviced lands and that Tier 2 lands are serviceable zoned lands not currently fully serviced but which have the potential to become fully serviced within the lifetime of the Plan (i.e. the next 6 years), while section 12.14 explains that Tier 3 lands are strategic lands necessary for long-term planning of infrastructure but which can, where appropriate, substitute for Tier 1 or Tier 2 lands not developed within the next 6 years.

We submit that, with regard to Draft Plan Objectives 10.61 and 10.63, our clients have prepared a co-ordinated masterplan for both areas, a summary of which forms part of this submission. This is to support the timely delivery of the sustainable development of these lands during the lifetime of the plan.

This submission strongly indicates that the Masterplan being prepared is very detailed and is based on a comprehensive and considered appraisal of the opportunities and challenges involved in the development of the lands.

In light of this fact, we submit that, rather than containing objectives to prepare framework masterplans for Stoneview and Ringwood, instead what is required of the new City Development Plan is to provide specific development objectives for how these sites can be facilitated to develop over the lifetime of the new City Development Plan.

A detailed framework of how this can be achieved is set out in the enclosed masterplan document. A requested zoning regime, based on the outcomes of the masterplan process, is illustrated below.



An indicative total of residential units identified across the lands is 2,515no. – 1,158 no. at Ringwood and 1,357 no. at Stoneview. In terms of Tier 2 and Tier 3 zonings, those proposed would deliver an indicative total as follows:

	Ringwood	Stoneview
Tier 2	711	413
Tier 3	447	650

It must be acknowledged that the vast majority of Urban Expansion Areas in the CMA, and indeed Cork Docklands itself, face similar, if not more difficult, infrastructural challenges than those at Blarney, yet it would appear only those identified at Blarney have formed a basis of a dramatic change to current planning policies and the City's overall development strategy.

The lands at Stoneview and Ringwood can and should play a pivotal role in the delivery of Cork City Council's new land use and transportation strategy due to their strategic location in the context of the planned new rail station and their capability to accommodate the scale of residential development required to justify its business case and ongoing operation.

As stated already, among the NPF's key future growth enablers for Cork is progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors. Blarney is the only Urban Expansion Area on the northside of Cork City that can currently realise this ambition.

For a sustained period over the past 30 years, while the southside of the City has seen major expansion, the northside has lagged behind. Despite a largely supportive planning policy environment, the spatial imbalance in the City's development has continued and become more pronounced.

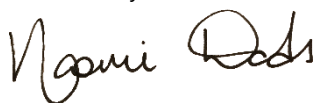
A new risk now presents itself with the preparation of a new Development Plan that development is facilitated to the south of the city along the urban edge between Rochestown and Bishopstown, and at Ballincollig and Carrigaline. This is evident in the allocation set out in the JHS. Development at Blarney on the northside of the City presents an opportunity to negate this risk and address the City's spatial, social, and economic imbalance in a truly sustainable manner.

We respectfully ask that the points herein and those set out in the accompanying Masterplan are reflected in the new City Development Plan.

It is trusted that the submission will be seen as a constructive and productive contribution to the preparation of the final Plan, and, in this regard, we request that it is given favourable consideration.

Please forward all correspondence in relation to this submission to this office.

Yours sincerely,



Naomi Dowds,
Coakley O'Neill Town Planning Ltd.