

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

**(Email Submission Only)**

28 April 2022

## **Submission by the Land Development Agency in relation to the Proposed Material Alterations to the Draft Cork City Development Plan 2022-2028**

The Land Development Agency (LDA) welcomes the opportunity to make a submission in respect of the Proposed Material Alterations to the Draft Cork City Development Plan 2022-2028. The LDA is a commercial state-sponsored body that has been created to coordinate and activate state lands for more optimal uses where appropriate, with a focus on the provision of housing and facilitating the delivery of more compact and sustainable urban development.

We look forward to working collaboratively with Cork City Council and other stakeholders in helping to realise the ambitions of the National Planning Framework, Southern Regional Spatial and Economic Strategy and emerging Development Plan in Cork City. In support of these growth ambitions and accelerating housing delivery in Cork City, the Government's *'Housing For All: A new Housing Plan for Ireland'* (September 2021) Plan identifies five strategic parcels of public lands for transfer to the LDA and this is likely to be further bolstered by other relevant public lands coming forward for affordable housing led development in the City during the plan period and beyond. Cork City Council is a key stakeholder and the LDA looks forward to engaging with the Council in progressing these lands over the coming years as has been the case with the proposed redevelopment of St Kevin's Hospital, Shanakiel where enabling works will commence shortly.

In accordance with the published guidance on making submissions on the Proposed Material Alterations to the Draft City Development Plan, we set out below our comments and suggestions in turn against each relevant material alteration. Section 1 provides comments on proposed zoning alterations and Section 2 comprises comments on the non-zoning material alterations.

### **Section 1: Zoning-related Material Alterations**

#### **1.1 Zoning Amendment Nos. 2.13 & 2.14: ESB Lands South of Centre Park Road**

These two proposed zoning amendments culminate in the ESB lands to the south of Centre Park Road in the South Docks being zoned in their entirety for *'Sports Grounds and Facilities'* and *'Education'*. It is also noted that there are additional material alterations to zonings elsewhere within the wider South Docks that re-zone lands from *'Sports Grounds and Facilities'* to *'Residential'* (Amendment Nos. 2.12 & 2.16) and *'Education'* to *'Mixed Use'* (Amendment No. 2.16).

The LDA is well underway with due diligence on the ESB lands and the ESB lands to the south of Centre Park Road are to be prioritised for affordable housing-led regeneration having regard to the existing pattern of permitted and emerging proposals to the east.

The LDA requests that the zoning of the ESB lands south of Centre Park Road be revisited having regard to the Government's Housing Policy to 2030 (*'Housing for All'*) and provisions within the wider draft Development Plan confirming support for opportunities to deliver elevated affordable and social housing provision in the South Docks. The need to deliver sports facilities and schools as part of the sustainable regeneration of the South Docks is acknowledged and supported; however, this needs to be assessed in the context of a wider masterplanning and infrastructure sequencing strategy where regard is also had to optimising public lands for accelerating affordable housing delivery and catalysing wider regeneration objectives.

We note detailed masterplanning/site optimisation analysis has yet to be undertaken in respect of the education-zoned lands in the South Docks and the Council's intent to prepare a Strategic Framework Masterplan for the South Docks (Material Alteration No. 1.220). The Strategic Framework Masterplan process represents an opportunity to undertake site optimisation analysis of the education-zoned lands with input from the Department of Education that includes exploring options for incorporating sports grounds and facilities through innovative design. If additional lands for sports grounds and facilities are required, these could subsequently be provided for as part of the Strategic Framework Masterplan.

There are a number of references in the Draft City Development Plan to *'Housing For All: A new Housing Plan for Ireland'* (September 2021) which is the Government's housing policy to 2030. This provides a clear strategy to prioritise delivery of affordable and sustainable housing and build the pipeline for the future. One of the key pathways to supporting implementation is the requirement to significantly increase housing supply and the LDA is a key driver of this objective. Under the *'Pathway to Increasing Housing Supply'* there are key actions identified including the proposal to 'bring forward additional state lands for activation' where a new tranche of state lands is to be transferred to the LDA with potential to deliver up to 15,000 homes. The list of State lands identified for transfer to the LDA include the following sites in Cork City:

- ESB Lands at South Docks (includes lands to the north and south of Centre Park Road)
- Bord na Mona Lands at South Docks
- Lands at Cork Port, Tivoli
- IDA Lands at Kilbarry
- ESB Lands at Wilton

The LDA is engaging with state bodies and relevant stakeholders regarding the above sites with a view to bringing forward planning and development frameworks to guide the future development of these lands for affordable housing-led development for the public good. In addition, the LDA is statutorily obliged to deliver 100% affordable and social housing on relevant public lands in Cork City and Dublin. We note and support Amendment Nos. 1.228 and 1.292 (Social and Affordable Housing) confirming Cork City Council aims to apply the Joint Housing Strategy targets for below-market priced housing to the City Docks to both achieve balanced communities and meet housing need. The amendments also confirm the Council's intent to explore options to enable affordable and social housing delivery to be elevated to the Joint Housing Strategy Target for the South Docks. The ESB lands represent an opportunity to significantly assist in increasing affordable housing delivery in the South Docks as the LDA is required to deliver 100% affordable and social housing on such lands. The Joint Housing Strategy 2022-2028 when referring to opportunities to facilitate affordable and social housing delivery in the City Docklands (Section 5.4.3) describes opportunities to achieve delivery of affordable and social homes through the use of public lands and the involvement of the LDA: *'...there are a number of large land banks in the ownership of state bodies which may be suitable for development by the Land Development Agency or other bodies, and these may provide further opportunities for increasing delivery of social and affordable homes'*.



It is respectfully requested that the rezoning of the ESB lands to the south of Centre Park Road to non-residential uses in their entirety be revisited. The Government's 'Housing for All' Plan makes clear these public lands have been identified for transfer to the LDA for affordable housing-led development.

The proposed South Docks Strategic Framework Masterplan (Alteration No. 1.220) process represents an opportunity to undertake site optimisation analysis of the education zoned lands with input from the Department of Education. This could confirm that some or all of the required sports facilities could be accommodated within the education zoned lands. If additional lands for sports grounds and facilities are required, these could then be provided for as part of the Strategic Framework Masterplan that explores the requirement in a wider South Docks context.

## Section 2: Non-zoning related Material Alterations

### 2.1 Amendment No. 1.3: Framework Plans

The proposed inclusion of additional text clarifying the local planning position relating to areas where Framework Plans are proposed to be prepared over the course of the Development Plan period is supported. The new text confirms that *'where framework plans are indicated for an area, this does not imply that no development proposals will be considered prior to the framework plan being prepared. However, the scale, mix and form of any such development and its associated infrastructure will need to be designed to successfully integrate with the existing and emerging local neighbourhood and wider city area'*. This is important in ensuring that high quality, sustainable development proposals are not delayed in advance of Framework Plans being prepared.

This is also a consideration in respect of the lands at Kilbarry where the Government's 'Housing for All' Plan provides for their transfer to the LDA for affordable housing-led development. A Framework Plan for Blackpool/Kilbarry is proposed within the Development Plan while Amendment 1.308 requires development at the Kilbarry lands to be masterplan-led. Therefore, the masterplan represents an opportunity to guide sustainable development at Kilbarry and inform the subsequent Framework Plan for the wider area.

The material alteration is supported.

### 2.2 Amendments 1.25, 1.30, 1.45 and 1.340: Longer Term Strategic Development Lands and Figure 2.21 (Growth Strategy Map)

The LDA notes the proposed material alterations to revise the Core Strategy and associated zoning objective to re-categorise 'Tier 3 Residential Neighbourhoods' as 'Longer-Term Strategic Development Lands' that are identified and protected for longer term growth but are not zoned within the Draft Plan. The alteration is supported in principle and the retention of longer-term strategic development lands provides direction and certainty regarding future growth patterns post-2028 and allows lands such as those identified for transfer to the LDA at Kilbarry (where the most northerly parcels of land are identified as longer-term strategic development lands) to be masterplan-led to ensure design, integration and infrastructure planning opportunities are optimised.



We acknowledge Material Alteration 1.30 proposes to update Figure 2.21 to reflect wider material alterations. It is assumed that the updated Figure identifies lands at City Docks and Tivoli as ‘Tier 1 or Tier 2’ rather than ‘Tier 3 or Tier 2-3’ (as per the Draft Plan) to reflect their land use zoning in the draft Plan rather than the newly re-categorised Tier 3 which refers to non-zoned, longer term strategic development lands.

The material alterations seeking to identify ‘Longer Term Strategic Development Lands’ are supported. It is requested that the updates to Figure 2.21 include updated annotations which no longer identify City Docks and Tivoli as Tier 3 (Longer Term Strategic Development Lands) as these lands are zoned and could be serviced in full or in part during the plan period given the national support and emphasis on their regeneration.

### 2.3 Amendment 1.47: Urban Development Zones

The proposed inclusion of a new objective within the draft Development Plan acknowledging emerging proposals for Urban Development Zones (UDZs) and confirming Cork City Council ‘will consider the application of UDZ designation for strategically important and large-scale areas of growth identified in the Core Strategy’ is supported. It is suggested that in accordance with the terms of the ‘General Scheme Land Value Sharing and Urban Development Zones Bill 2021’ the text of the objective is updated to confirm the City Council would also look to support the proposed designation of lands as an UDZ by the LDA or such other agency or person prescribed by the Minister.

The material alteration is supported in principle, but it is suggested the objective text is revised to reflect the content of the ‘General Scheme Land Value Sharing and Urban Development Zones Bill 2021’:

*“In line with emerging policy on Urban Development Zones (UDZs), as set out in the Government’s (2021) Housing for all A New Housing Plan and General Scheme Land Value Sharing and Urban Development Zones Bill 2021, Cork City Council will consider the application of UDZ designation or support UDZ designation as relevant where this is proposed by the Land Development Agency or other relevant parties prescribed by the Government for strategically important and large-scale areas of growth identified in the Core Strategy.”*

### 2.4 Amendment 1.50: Delivery of Relevant State Land

The LDA supports the inclusion of a new objective confirming the City Council together with relevant stakeholders such as the Land Development Agency (LDA) will support and enable the development, renewal and regeneration of suitable state-owned lands as potential key deliverables to achieve NPF growth targets. The LDA wishes to continue working collaboratively with the City Council and associated stakeholders in actively managing, activating and delivering sustainable development on relevant public lands in Cork City across the plan period and beyond.

The material alteration is supported.

### 2.5 Amendment 1.125: Glenamought River Valley Park

The proposed alteration to add the Glenamought River Valley Park to the table of ‘City Scale Green and Blue Infrastructure Opportunities’ in the draft Development Plan is supported; however, it is suggested a diagram illustrating the proposed extent of the park correlating with the existing public open space zoning or supporting text confirming the park aligns with the public open space zoning would improve understanding



and avoid ambiguity in implementing the proposal. Similarly, it is also suggested that the text is updated to confirm that ‘adjoining development’ shall safeguard access etc.

The material alteration is supported but it is suggested additional clarification will assist in delivering the proposal whilst also being consistent with the other objectives and descriptions of projects listed in Table 6.4:

*“To establish the Glenamought River Valley Park, **as currently zoned for public open space and illustrated on diagram xx**, as a key green and blue infrastructure asset by safeguarding and enhancing its function a linear wildlife corridor and riverside amenity **with a range of historic, cultural and social landmarks**. **All development adjoining the park within this area shall safeguard pedestrian access to the riverside. historic, cultural and social landmarks and their integration into any enhanced future riverside park.**”*

## 2.6 Amendment 1.220: Strategic Framework Masterplans for South Docks and North Docks

The LDA welcomes and supports the proposed insertion of text confirming a commitment to prepare Strategic Framework Masterplans for both the South Docks and the North Docks to inform the design of infrastructure projects, masterplanning and overall design within these strategic regeneration locations. The proposed Framework Masterplans represent an opportunity to consolidate and update previous guidance for these locations and incorporate the emerging transport, drainage and public realm studies that have informed the preparation of the draft Development Plan. They will also provide a robust basis for coordinating development alongside infrastructure investment and delivery. The coordinated and sustainable regeneration of these nationally significant regeneration sites including Tivoli Docks will be key to accommodating the ambitious growth targets for Cork City in a manner that also achieves more compact growth and the implementation of the 15-minute city concept. All three locations include public lands and in the case of the South Docks and Tivoli, lands are identified for transfer to the LDA in the Government’s ‘Housing for All’ Plan.

The material alteration is supported.

## 2.7 Amendments 1.228 and 1.292 (Social and Affordable Housing)

The material alterations relate to the insertion of new text confirming Cork City Council aims to apply the Joint Housing Strategy targets for below-market priced housing to the City Docks to both achieve balanced communities and meet housing need. The text also confirms the Council’s intent to explore options to enable affordable and social housing to be elevated to the Joint Housing Strategy Target and we note that there was a suggestion in the alterations to Objective 10.28 that a 34% affordable and social housing target was proposed but then deleted.

As noted in our comments on Amendment Nos. 2.13 and 2.14 (re-zoning of ESB lands south of Centre Park Road), the LDA’s statutory remit includes the delivery of 100% affordable and social housing on relevant public lands in Cork City and Dublin. Therefore, as noted in the Draft Joint Housing Strategy and HNDA, the LDA can contribute towards the delivery of elevated levels of affordable housing, particularly on relevant public lands such as those in the South Docks. The LDA looks forward to working with the City Council to assist in accelerating affordable housing delivery in the South Docks on these lands where collaboration between the parties, infrastructure providers, local community and other stakeholders will be key in realising the delivery of sustainable and balanced communities in the South Docks.





The material alteration is supported and the LDA looks forward to working with key stakeholders in delivering affordable and social housing in the South Docks. Please also see our comments on the proposed re-zoning of the ESB lands south of Centre Park Road above (Amendment Nos. 2.13 and 2.14).

## 2.8 Amendment 1.299: Planning for Enabling Infrastructure at Tivoli

The proposed alteration inserts a new Objective relating to enabling infrastructure planning at Tivoli as follows:

*“Objective 10.x (Planning of enabling infrastructure): The planning of enabling infrastructure for Tivoli will be a key task during this Plan period. Further detailed analysis is required to determine the appropriate location and design of key infrastructure, including the new train station and the new eastern entrance access and its integration with the Dunkettle Interchange Upgrade Scheme. In planning for and delivering such infrastructure, Cork City Council will continue to engage with key infrastructure providers (including the NTA, Irish Rail and TII) to ensure compliance with statutory design, planning, safety and traffic management standards and safeguards.”*

This new objective is welcomed and supported. Tivoli is a nationally strategic regeneration site that remains in operation as a port facility and it has been identified for transfer to the LDA within the Government’s ‘Housing for All’ Plan. Therefore, in this context it is requested that the text of the proposed objective is updated to include reference to the LDA who shall be key stakeholders in planning for enabling infrastructure alongside the City Council and the organisations listed in the draft Objective. In optimising the use of this strategic regeneration site and associated infrastructure investment, a joined-up approach is critical to ensure the transport infrastructure planning correlates with emerging proposals relating to the redevelopment, phasing and operational activity within Tivoli over the plan period and beyond.

It is requested that the text of the proposed new objective is revised as per the suggestion below:

*“Objective 10.x (Planning of enabling infrastructure): The planning of enabling infrastructure for Tivoli will be a **key-task priority** during this Plan period. Further detailed analysis is required to determine the appropriate location and design of key infrastructure, including the new train station and the new eastern entrance access and its integration with the Dunkettle Interchange Upgrade Scheme. **This also needs to be closely aligned with redevelopment proposals and phasing, infrastructure delivery and the phased relocation of port activity to Ringaskiddy.** In planning for and delivering such infrastructure, Cork City Council will continue to engage with key **stakeholders and infrastructure providers (including the NTA, Irish Rail and TII) and the LDA** to ensure compliance with statutory design, planning, safety and traffic management standards and safeguards.”*

## 2.9 Amendment 1.308: Lands at Kilbarry

The material alteration proposes a new objective as follows: *‘The sites in Kilbarry that are zoned Tier 2 Residential and designated as Longer Term Strategic Development will be master planned to accommodate a housing and have regard for and integrate the amenity, heritage and social history of the area, in particular Murphy’s Rock.’*

The LDA supports the new objective with some suggested updates below. The Government’s ‘Housing for All’ Plan identifies the public lands falling under the above zonings for transfer to the LDA for activation and to deliver affordable housing-led development. Development proposals shall be brought forward by the LDA through a masterplan led process in consultation with key stakeholders including the local community, Cork City Council, infrastructure providers and other interested parties as relevant.



The objective is supported; however, we set out below suggested additional text to help positively inform the final Development Plan and have regard to the wider Blackpool/Kilbarry Framework Plan proposal:

*The sites in Kilbarry that are zoned Tier 2 Residential and designated as Longer Term Strategic Development will be master planned to accommodate ~~a~~ housing-led, **sustainable development** and have regard for and integrate the amenity, heritage and social history of the area, in particular Murphy's Rock. **It shall culminate in a comprehensive masterplan that integrates with the wider Kilbarry area and informs the Blackpool-Kilbarry Framework Plan to be prepared by Cork City Council.***

## Conclusion

The Land Development Agency (LDA) would like to thank Cork City Council for the opportunity to comment on the Material Alterations to the draft City Development Plan 2022-2028. The draft Development Plan comprises a comprehensive, detailed and ambitious strategy for the ongoing sustainable development of the City over the plan period and into the future.

Overall, the LDA is supportive of the majority of the material alterations to the draft Development Plan which will assist in implementing and monitoring the core strategy and objectives. We look forward to on-going engagement and partnership working with Cork City Council in discharging our functions in the City.

Kind Regards,

Denis Barry  
LDA Strategic Planning  
[planning@lda.ie](mailto:planning@lda.ie)