

Submission to the Draft Cork City Development Plan 2022-2028



October 2021

Prepared by: **Butler O'Neill Total Planning Solutions**



1.0 EXECUTIVE SUMMARY

- 1.1 This submission makes several planning arguments in favour of a very modest alteration to the zoning of the subject lands at White's Cross Cork City.
- 1.2 The Draft Development Plan is welcomed and the concept diagrams indicate that the site in question is within the compact growth area – however the zoning map indicated in the Draft Plan [Map 13] indicates the site as being within the city hinterland [restricted] area.
- 1.3 John Roche, a local person and land owner [who lives directly to the north of the lands which are the subject of this submission] is seeking a moderate expansion of the existing built up area designation to allow for a single dwelling to be constructed on his lands for his son David who lives with his own family in his family home and is in urgent need of housing.
- 1.4 The submission presents a multi-faceted and robust case in favour of the designation of the subject lands as within the compact growth area. A planning case is presented in favour of the rezoning of the lands and it is considered that the subject lands are the optimum choice for residential for a number of reasons:
- **Location of the lands:** the subject lands are within the compact growth area as designated in the draft Cork City Development Plan – The majority of the Whites Cross area including the subject site is within the Compact Growth Area but for some reason [a mapping error?] the subject site is within the hinterland restricted area.
 - **Ambitious Population and Housing Targets:** In the context of the significant supply-side challenges currently facing both the housing and planning sectors, more proactive measures are needed in order to meet the population and housing targets set out at a regional level. In fill development in existing areas within the identified compact growth area should not at the same time be within a restricted area.
 - **Availability of Development Land:** As such, in the presence of substantial demand and unprecedented under-supply it is considered that it is the legislative responsibility of Cork City Council to ensure that there is sufficient *developable and available* land in order to meet regional and national population and employment targets. In this way modest growth of existing established residential areas should be promoted not restricted.
 - **Planning Policy Context:** the national, regional and local planning context provides a strong context for the inclusion of the subject lands within the compact city development boundary. The NPF states that: "Where greenfield development is necessary it should take place through the logical extension of existing cities, towns and villages". This is particularly important in the context of this submission as it presents the case, at a national level for greenfield development to occur on the periphery of/with the boundaries of, urban areas

Principal Point

- 1.5 In light of the evidence presented and, ultimately in the interest of proper planning and sustainable development the submission strongly recommends that the subject lands are designated as being zoned as 'New Residential Neighbourhood' within the 'Compact Growth' area rather than the 'Hinterland' area of Cork City Metropolitan Area. The Hinterland designation is very rural in nature and will be very hard to reverse. The advocates of the boundary extension sought an appropriate area for the city to grow but the hinterland designation seems to be doing the opposite.

2.0 INTRODUCTION

- 2.1 Butler O'Neill has been commissioned by land owner John Roche to prepare a submission to the Draft Cork City Development Plan 2022-2028.
- 2.2 This submission is framed within the context that the draft plan proposes that the subject lands are not suitable for development – despite being located within the designated compact growth area, the subject lands are somehow incredibly not part of the area earmarked for future development rather are located within a somewhat restrictive 'hinterland' designation.
- 2.3 This it is felt, is incongruous with its location within the contiguous built up area of White's Cross within the contiguous built up northern extremities of Cork City. It is suggested the site should be zoned as within the 'compact city' area designated as white i.e. existing built up area.
- 2.4 The forthcoming plan will be the principal planning document for the future development of Ireland's Second City for the next 6 years and in the context of a changing urban environment where ambitious housing targets and employment growth have led to a greater need for residentially zoned lands in sustainable areas that are in close proximity to employment nodes in accordance with the National Planning Framework it is argued that the proposed lands meet this criteria and an overly restrictive approach has been adopted in this case.
- 2.5 The zoning of site in question would allow for a single dwelling to be built.
- 2.6 This submission considers the relevant national, regional, county and local level planning policy contexts relating to the subject lands. Furthermore, statistical datasets in relation to housing, employment and development generally will be outlined in order to provide substantive justification for the ensuing recommendations.
- 2.7 The submission outlines that there exists an opportunity to further improve the pattern and nature of urban development within the Cork City functional area and its immediate environs and makes suggestions in relation to the area's ability to accommodate projected growth within appropriate and sustainable locations with specific reference to the subject lands. The Hinterland area needs to be considered a 'future growth /future development area' if the population growth earmarked is to be achieved.

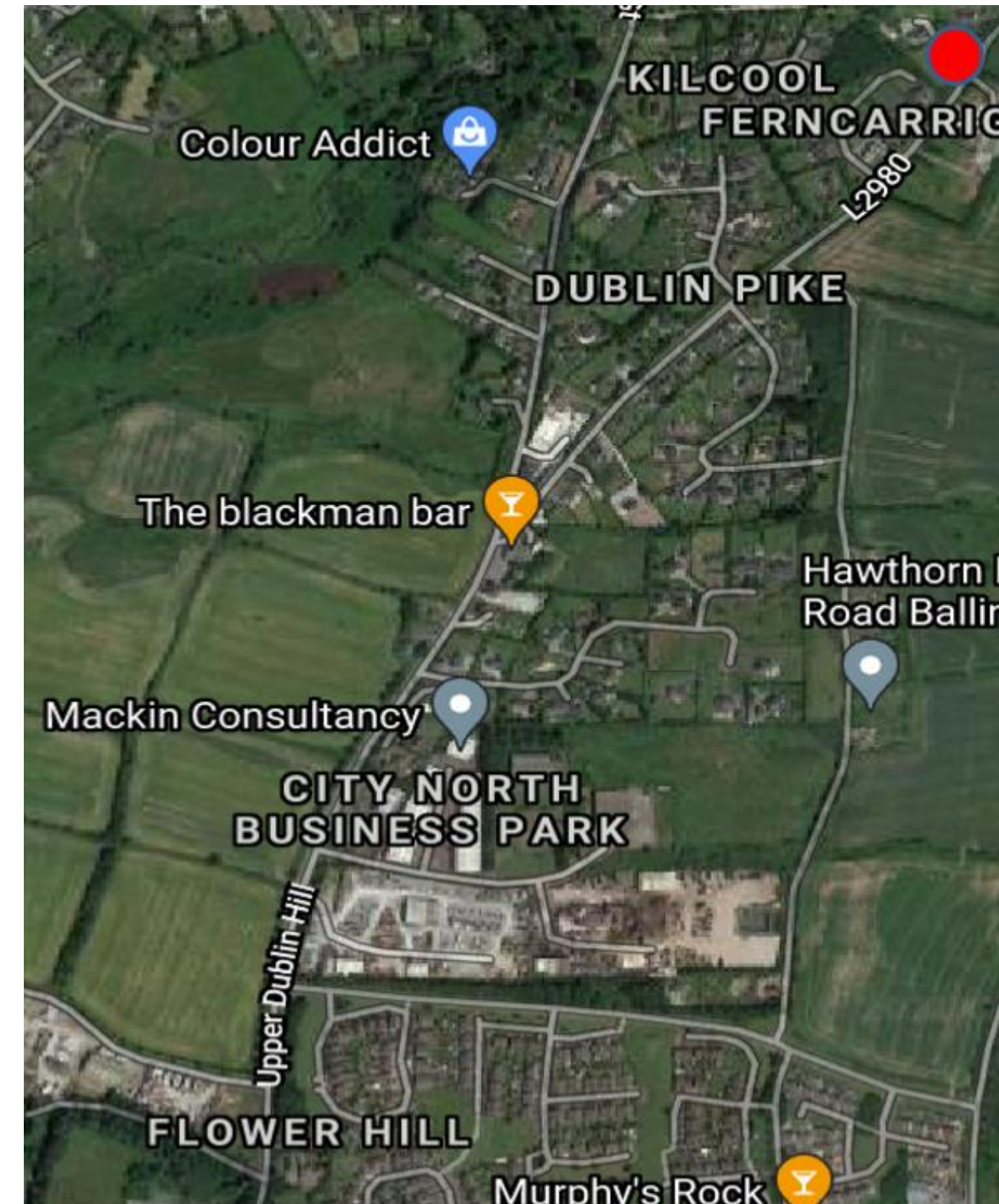


Figure 01 Site Location

The Site

- 2.8 The subject lands are strategically located within the existing built up area of the north side of Cork City.

3.0 PLANNING POLICY CONTEXT

National Planning Framework

- 3.1 The ‘National Planning Framework’ provides the National Planning Policy Context for the proposed scheme [Ireland 2040], which succeeds the National Spatial Strategy. This document has legal standing and forms the overarching document in the hierarchy of plans in Ireland. It provides guidance for national planning priorities and streamlines relevant Government policies and informs investment on national and regional development imperatives.
- 3.2 The NPF is predicated on the assumption that by 2020 there will be an additional one million persons in Ireland and in order to effectively plan for and manage this growth it is important that key priorities are set out at the highest level to be implemented by all local authorities’ in the pursuit of a shared vision for the planning and development landscape of the country.
- 3.3 The key message of the 2040 NPF is threefold:
- Growing our regions, their cities, towns and villages and rural fabric.
 - Building more accessible urban centres of scale.
 - Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.
- 3.4 National Planning Framework also has statutory bases. Unlike the National Spatial Strategy (NSS) 2002 which was not a legal document it was a 20-year spatial plan direct development and investment to those locations that had the infrastructural capacity to take development. It designated a series of hubs and gateways which were earmarked for significant growth which appeared to be an unpopular choice amongst those who were not within these areas and was an ineffective attempt to counterbalance the strong growth that had occurred in the Dublin region in the years leading up to the NSS.
- 3.5 The objectives of the NPF are applied on a regional basis through Regional Spatial and Economic Strategies [RSEs]. These will also be statutory and will set out regional level aspirations for our key areas and growth centres.
- 3.6 According to the NPF **“There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside” [2017:8] The area in question is essentially an infill development.**
- 3.7 One of the key aspirations of the NPF is to address the issue of our regional cities and to ensure that all of the regional cities grow at ambitious rate. The NPF states that the regional cities of Cork, Limerick, Galway and Waterford are growing but not at the scale or pace required to operate “as realistic alternatives to Dublin” and that this needs effective and coordinated action to remedy.

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

Figure 03 Population Targets for Ireland’s Cities [Extract Table 4.1 Ireland 2040]

- 3.8 The population targets in the NPF certainly set out in an ambitious aspiration for Cork, in order to achieve this it states that Cork needs to be an internationally competitive and sustainable urban environment. The NPF is also quite strong in stating that Irish towns can accommodate a significant amount of future population growth. Ireland 2040 states that “There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth” [Ireland 2040:58].
- 3.9 It is contended that the development of infill serviced lands within development boundaries of towns and extensions of established built up areas of towns and settlements as proposed by this current zoning proposal addresses the key messages as outlined in the NPF and the achievement of the targets projected.

REGIONAL PLANNING CONTEXT

- 3.10 The Regional planning context is provided by way of the Southern Regional Economic Spatial & Economic Strategy which is currently in draft form. The RSES sets out that by 2040 the population of the southern region will most likely grow by 380,000 to almost two million people rendering the need for a considerable amount of new jobs as well as new homes.
- 3.11 The RSES states that the region is well placed to capitalise on a changed approach. The RSES Vision is to:
- Nurture all our places to realise their full potential;
 - Protect, and enhance our environment;
 - Work to achieve economic prosperity and improved quality of life for all our citizens;
 - Accommodate expanded growth and development in suitable locations; and
 - Promote the region’s international reputation as one of Europe’s most creative, innovative, greenest and liveable regions. [2019:23].
- 3.12 According to the RSES Metropolitan Cork has existing critical mass and is an emerging international centre of scale driven by the State’s second city of Cork at the core supported by a network of metropolitan towns and strategic employment locations. It states that sustainable higher densities must be delivered,

especially at public transport nodal points. National growth targets will see an additional 75,000 to 2031 (c. 283,700 population by 2031) in the City and Suburbs. The Rest of Metropolitan Area will see an additional 29,657 people by 2031 (c. 125,000 population by 2031).

- 3.13 In relation to housing and regeneration the RSES state that: “The sustainable growth of Metropolitan Cork requires investment into each of the following locations:
- (i) City Centre Consolidation and Regeneration (City Centre revitalisation, Cork North and South Docklands and Tivoli);
 - (ii): Potential Light Rail Transit Corridor City Suburban Area (in addition to city centre area, nodal points and corridors on a potential Light Rail Transit Corridor from Ballincollig to Mahon via the City Centre, North and South Environs, District Centres, Glanmire and further regeneration and consolidation initiatives),
 - (iii): City and Suburban Area Expansion (active land management will be required to identify further development opportunities to facilitate sustainable, infrastructure led growth);**
 - (iv): Metropolitan Towns on Rail Corridor: (Monard SDZ as a new metropolitan town requiring rail access and road access to the national road network, regeneration, compact growth and infrastructure led urban expansion areas in Midleton, Cobh, Carrigtwohill and Blarney);
 - (v): Other Metropolitan Towns: (including Carrigaline). As such realising development on these lands is in line with the key aspirations of the RSES.

- 3.14 The central element of the strategy is on strengthening the Cork Metropolitan area and the Cork MASP element of the RSES it states that “Cork is emerging 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”

LOCAL PLANNING CONTEXT:

DEVELOPMENT PLAN 2014

- 3.12 The extension of Cork City Councils administrative boundary in May 2019, expanded the city by five times its previous size, increasing its population to 210,853 persons. The Cork boundary extension took the majority of ‘Metropolitan Cork’ into the City Council Functional area as it was considered that the city boundary [pre extension] was too constrained and that the de facto city has expanded beyond the historic boundary and the constrained size was limiting the ability of Irelands second city to grow as a restrictive growth policy was in place around Metropolitan Cork. The boundary was expanded to allow for ambitious and much needed growth to happen in order to counterbalance the overconcentration of development happening in the Greater Dublin Area [areas over 45mins commuting distance to the city]. In order to achieve this – Cork is tasked with doubling in size between now and 2040. In order to do this sustainably all areas along good public transport corridors should be tenaciously pursued for residential development.
- 3.13 Since the publication of the NSS in 2002 National Policy has dictated that the overconcentration of housing growth in the Greater Dublin Area needs to be balanced by significant growth in Cork. This simply has not been pursued with the vigour and tenacity [through the forward planning system] that it should be. Development Management Planners can only react to the planning applications which are lodged. There is a need for the plan to be more ambitious and more serious about its obligation to be consistent with regional and national policy.

- 3.14 As can be seen from the Cork City Growth Strategy the subject site is designated as being within the Compact Growth area. The draft plan states that “sites largely surrounded by existing development are considered to be within the city’s existing built-up footprint. This includes infill and brownfield sites and sites contiguous to the existing city or urban town. Lands that are largely separate from the existing built-up footprint are considered greenfield in nature.” The subject site as such, owing to its designation within the Compact Growth Area should be considered for development [but has been constrained by a contradictory designation within the hinterland].

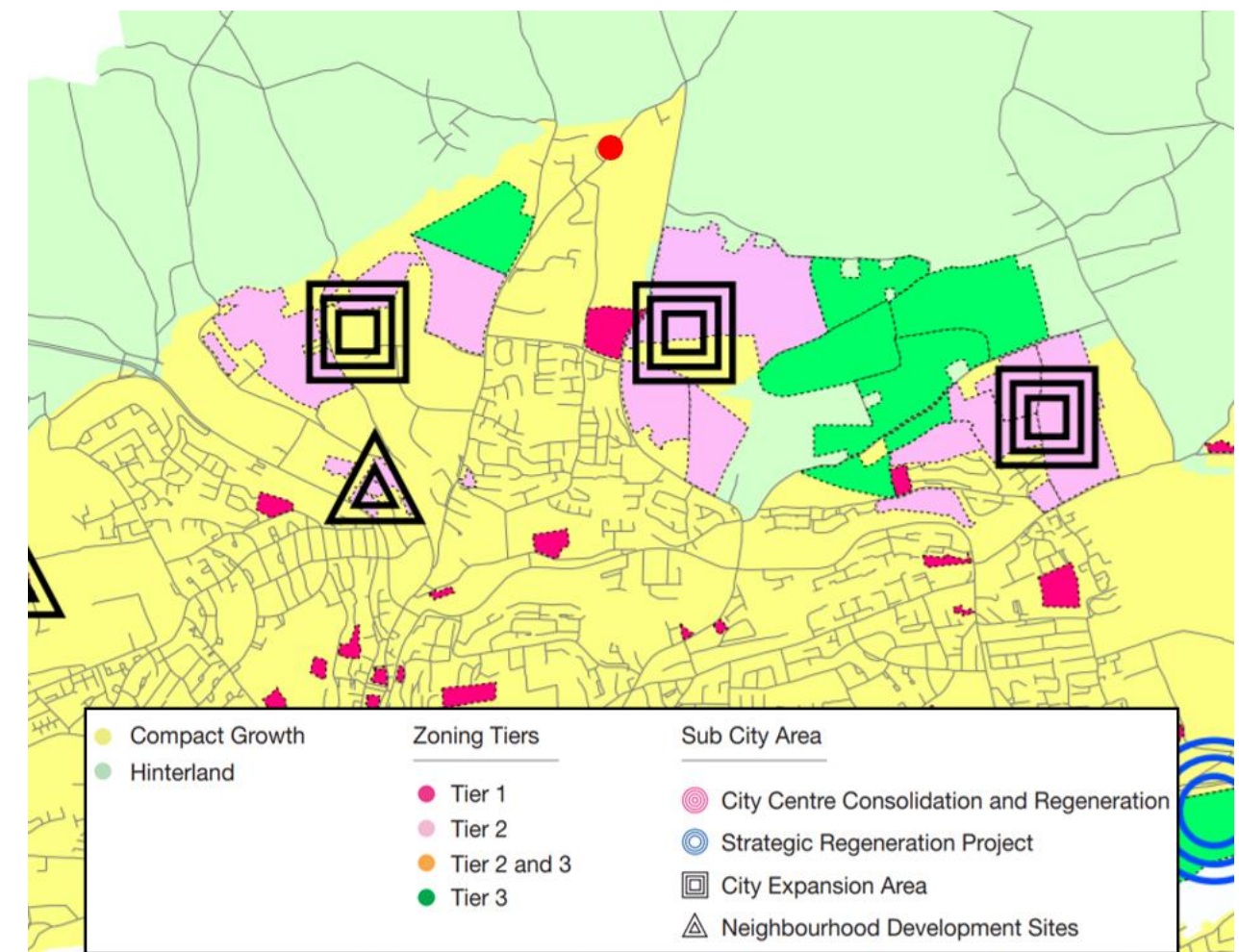


Figure 04 Cork City Growth Strategy – Draft Development Plan [RED CIRCLE = SUBJECT LANDS]

- 3.15 The Growth Strategy Diagram clearly shows the subject site as clearly within the Compact Growth area – this is clear and unambiguous.

4.0 THE SUBMISSION

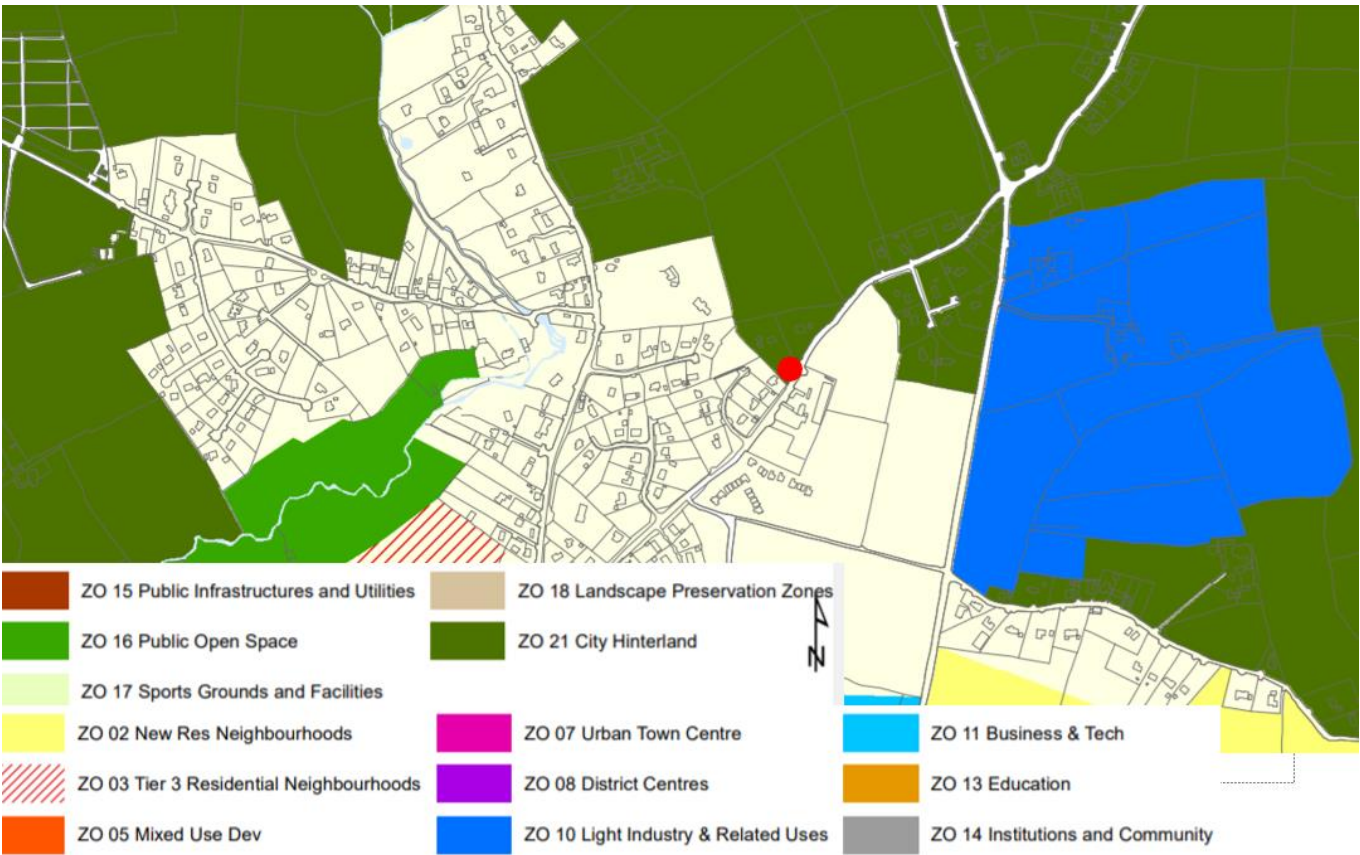


Figure 05 Proposed Zoning Cork City Development Plan

- 4.1. Despite being designated in the Growth Strategy as being clearly within the Compact Growth Area the Draft Cork City Development Plan designates the site as being within the ‘City Hinterland’. The primary objective of this zone is to preserve the character of the City Hinterland generally for use as agriculture, rural amenity, open space, recreational uses, green and blue infrastructure and to protect and enhance biodiversity. Rural-related business activities which have a demonstrated need for a rural location are also permissible. Any development associated with such uses should not compromise the special function and character of the City Hinterland in the particular area. Other uses open for consideration in this zone include renewable energy development (wind turbines, solar farms), tourism uses and facilities, garden centres and nurseries, cemeteries and community and cultural uses, market gardening and food production ancillary to agricultural uses. This is the most restrictive zoning type within the Development Plan.
- 4.2. The majority of the areas within the compact growth area are designated as ‘Sustainable Residential Neighbourhoods’ The subject lands should have been included within this area for which the objective is: “The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City’s built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents. Development in this zone should generally respect the character and scale of the neighbourhood in which it is situated. Development that does not support the primary objective of this zone will be resisted.

4.3. Cork City needs to accommodate significant levels of sustainable growth according to the NPF. This can only be delivered by intervening actively to facilitate development in established built up areas.

The Current Context

- 4.4. 2020 and the first half of 2021 saw unprecedented upheaval across all of Irish society as a result of the Covid-19 pandemic. The housing market didn’t escape this upheaval, with the number of homes put up for sale in the first of the year [2020] down by over 50%. While things improved in the third quarter of the year, as the economy reopened, the volume of listings in any given month never even matched the same month in 2019, let alone offered signs of catch-up. For the year as a whole, just 49,000 homes were advertised – the lowest total in over five years [recent data from Ronan Lyons - Daft Quarterly Report Q4 2020]
- 4.5. It would appear that there is a high level of demand for housing in Cork City and County, indicated by a low level of supply of high quality dwellings in both the rental and sales sectors and consistent quarter on quarter price increases - there is an extreme shortage of properties in the city which is having a consequent impact on the price of housing/accommodation to the extent that, we are now facing an affordability crisis in the private rental and sales sector.
- 4.6. It could be argued that this is due to the lack of supply of newly constructed units and the private rental sector is being overcrowded as a result this constrained supply is ensuring prices are kept inflated. There is an urgent need for proactive measures to remedy the current supply-side situation which is characterising and dominating the planning and housing landscape in the Cork City-region at the moment.

Housing Targets

- 4.7. The Regional Indicators Report provides a useful contemporary statistic context upon which some of the high level arguments pertaining to zoning additional lands can be framed which illustrates that the demand for housing is rising.
- 4.8. Between now and 2028 the quantum of population [target] within the Cork City Council functional area is 49,580 persons.

HOUSING DELIVERY IN CORK CITY 2016-2019					
YEAR	2016	2017	2018	2019	TOTAL
TARGET	2,000	2,000	2,000	2,000	8,000
DELIVERED	299	414	599	731	2,043
SHORTFALL	1,701	1,586	1,401	1,269	-5,957

Figure 06 Overview of Housing Delivery in Cork City 2016-2019

- 5.1. It is considered that in the context of the failures to achieve the growth targets set out at a national [NPF], regional [RSES’s] and local [Core Strategy City Development Plan] level, consideration of housing on lands

- such as the proposed lands are crucial to addressing the lack of provision of residential development in the Cork City area.
- 5.2. In order to achieve these ambitious targets and grow at the pace and scale prescribed for in national policy there needs to be more flexibility in zoning terms in certain instances as well as more land considered for residential development [in certain instances] and it is considered of national importance that in instances where land is available, well connected to public transport and serviced then development on said lands should be considered for development.
- 5.3. To address the tangible [and worsening] housing shortage it is considered that proactive and coordinated action needs to be taken to ensure that sites that are indeed suitable for residential development should be supported and that those site that are serviced and readily available for development are not precluded from being developed because of restrictive zonings within 10/15 mins drive from Irelands second biggest city. development.
- 5.4. There is a real danger that in the attempts to solve the current housing crisis, there will be pressure to overlook the need for sustainable, appropriate forms of development. There is very little to be gained by trying to solve the housing crisis simply using a broken model based on “delivering units anywhere” rather than “making successful neighbourhoods” and there is a real possibility that development will be facilitated outside the city council area in the functional area of Cork County Council if sufficient land for housing is not made available. In a single housing market houses for sale in Whites Cross or Killeagh will attract the same potential purchaser looking to travel to the city for work each day.
- 5.5. According to the Draft City Development Plan the Hinterland, if developed, will create sprawl, it states: “Growth in the city hinterland is managed through the delivery of scaled community, housing and local employment developments in the settlements of Killeens, Upper Glanmire and Kerry Pike. Any development proposals in the remainder of the hinterland will be closely managed to protect against unnecessary and unplanned urban sprawl.” The subject lands are within the compact growth area and the provision of a single dwelling on these lands should be acceptable to the local authority.

6.0 CONCLUSION

- 6.1 John Roche is pleased for the opportunity to make this submission to the Draft Cork City Development Plan 2022 and trusts that the evidence presented outlines the suitability of the subject site for inclusion within the ZO 1 Sustainable Residential Neighbourhoods – requiring a modest adjustment.
- 6.2 As has been demonstrated in this submission, there is a strong case, evidenced through adopted planning policy documents specifically the NPF, RESEs, the Cork City Development Plan and parts of the Draft Plan that there are ambitious and very challenging housing targets for Cork and the subject lands with their strategic location could and should be providing a proportion of the required housing units.
- 6.3 This submission makes several planning arguments in favour of the alteration of the current zoning designation of lands located at Whites Cross. The lands are designated as being within the Compact Growth area and the compact growth area and the area designated ‘sustainable Residential Neighbourhoods’ generally align and consideration should be given to adjusting this.

- 6.4 . In the context of the significant supply-side challenges currently facing both the housing and planning sectors, evidence is presented in this submission that substantiates the view that more proactive measures are needed in order to meet the population and housing targets as well as employment targets set out at a regional level. One of the solutions to this is to zone appropriate land which is developable in the short term.
- 6.5 In conclusion and in light of the evidence presented and, ultimately in the interest of proper planning and sustainable development the submission strongly recommends that the subject lands be designated as within the Sustainable Residential Neighbourhood area.

THE END			
Butler O'Neill		Total Planning Solutions	
directors	Clara O'Neill Roisin Butler	address	Thompson House, MacCurtain Street, Cork City
		email	totalplanningsolutions@gmail.com
		website	www.totalplanningsolutions.ie
		phone	086 3258274 085 7435332
			Registered in Ireland No. 501583