



**COAKLEY O'NEILL**  
town planning

**STATEMENT OF MATERIAL CONTRAVENTION**

**Proposed Strategic Housing  
Development, Monacnapa,  
Blarney, Cork**

Prepared in February, 2022 on behalf of

**Eoin Sheehan**

Coakley O'Neill Town Planning Ltd.

## Document Control Sheet

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## CONTENTS

1.0	INTRODUCTION .....	4
2.0	LEGISLATIVE CONTEXT.....	4
3.0	PROPOSED DEVELOPMENT .....	5
4.0	MATERIAL CONTRAVENTION.....	7
5.0	CONCLUSION .....	19
	APPENDIX .....	20

## 1.0 INTRODUCTION

- 1.1 We, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Co. Cork, have been instructed by Eoin Sheehan to prepare this Statement of Material Contravention in respect of a proposed a Strategic Housing Development, as enacted under the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, at Monacnapa, Blarney, Cork.
- 1.2 This Statement sets out a justification as to why the Board may grant planning permission for the proposed development in the context of Section 9(6)(c) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended).

## 2.0 LEGISLATIVE CONTEXT

### 2.1 Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended)

- 2.1.1 Section 9(6) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended) sets out the following in relation to developments which materially contravene the policies and objectives of a Development Plan:

- (a) *'Subject to paragraph (b), the Board may decide to grant a permission for a proposed strategic housing development in respect of an application Planning and Development (Housing) [2016.] and Residential Tenancies Act 2016 under section 4 even where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned.*
- (b) *The Board shall not grant permission under paragraph (a) where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned, in relation to the zoning of the land.*
- (c) *Where the proposed strategic housing development would materially contravene the development plan or local area plan, as the case may be, other than in relation to the zoning of the land, then the Board may only grant permission in accordance with paragraph (a) where it considers that, if section 37(2)(b) of the Act of 2000 were to apply, it would grant permission for the proposed development.'*

- 2.1.2 Section 37(2) of the Planning and Development Act 2000 (as amended) states the following in relation to material contravention:

- (a) *'Subject to paragraph (b), the Board may in determining an appeal under this section decide to grant a permission even if the proposed development contravenes materially the development plan relating to the area of the planning authority to whose decision the appeal relates.*
- (b) *Where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may only grant permission in accordance with paragraph (a) where it considers that—*
  - i. *the proposed development is of strategic or national importance,*
  - ii. *there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or*

- iii. permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or
- iv. permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

### 3.0 PROPOSED DEVELOPMENT



**Plate 1 Proposed Site Layout**

- 3.1 The proposed development will consist of a strategic housing development of 143no. residential units (8no. 1-bed; 38no. 2-bed; 71no. 3-bed; and 26no. 4-bed units), comprising 105no. houses (3no. detached; 42no. semi-detached; and 60no. terraced units) and 38no. apartments, ranging in height from 2-3 storeys above ground, including split-level houses.
- 3.2 The proposed development will also consist of the demolition of an existing garage and southern boundary wall, to be replaced with a new southern boundary wall, as well as the lowering of the existing eastern boundary wall and pier, at no. 1 Sunberry Drive; a crèche; all associated ancillary site development and landscaping works, to include bin stores, bicycle and car parking, ground works and retaining structures, foul drainage, stormwater drainage, water supply, service ducting and cabling, public lighting, relocation of existing ESB substation, and all boundary treatments.

- 3.3 The proposed development is to be accessed via the existing Sunberry Heights/Sunberry Drive off the Blarney Relief Road (R617). An upgrade is proposed to the existing Sunberry Heights/Sunberry Drive and the existing access to the proposed strategic housing development, including the widening of the footpath at the junction with the Blarney Relief Road (R617), raised platforms, security barriers and fencing as necessary, road markings, and road resurfacing to facilitate improved pedestrian/cycle connectivity.
- 3.4 Details relating to the housing types and proposed internal gross floor areas are outlined in the Housing Quality Assessment section of the Design Statement prepared by BRH Design Partners. An overview of the key development statistics is presented in Table 1 below:

<b>No. of Units</b>	143 (105no. houses (3no. detached; 42no. semi-detached; and 60no. terraced units) and 38no. apartments.
<b>Housing Mix</b>	1-bed apartment: 8 (5.5%) (458.8m <sup>2</sup> ) 2-bed apartment: 30 (21%) (2,455.2m <sup>2</sup> ) 2-bed house: 8 (5.5%) (656m <sup>2</sup> ) 3-bed house: 71 (50%) (7,875.39m <sup>2</sup> ) 4-bed house: 26 (18%) (3,439.4m <sup>2</sup> )
<b>Part V</b>	29no. units (8no. 2-bed apartments; 21no. houses (7no. 2-bed houses and 14no. 3 bed houses)
<b>Total Floorspace</b>	15,194.66m <sup>2</sup> (11,971m <sup>2</sup> (houses); 2,914m <sup>2</sup> (apartments); creche (309.66m <sup>2</sup> ))
<b>Site Area</b>	7.79ha
<b>Net developable area</b>	4.1ha
<b>Density</b>	35units/ha
<b>Plot Ratio</b>	1: 0.2 (overall site); 1:0.4 (net developable area)
<b>Site Coverage</b>	0.2 (overall site); 0.4 (net developable area)
<b>Public Open Space</b>	19% (7,934m <sup>2</sup> )
<b>Crèche</b>	42no. child places (309.66m <sup>2</sup> ) with 258.8m <sup>2</sup> private open space
<b>Car Parking</b>	182 no. shared surface car parking spaces (including 18 no. electric vehicle charging points). In addition, 30 no. car parking spaces (including 4 no. Electric Vehicle spaces) are provided in the basement of the apartment blocks. This equates to an average rate of 1.3 spaces per unit.
<b>Bicycle Parking</b>	9no. dedicated communal cycle stands with space for up to 8no. bicycles each are provided throughout the proposed development, and 2no. large cycle racks are provided in the basement of the apartment blocks which could accommodate up to 90no. bicycles; a well as 76no. spaces in a large cycle parking area on the ground floor of each of the apartment blocks, giving an overall total of 238no. dedicated cycle spaces). Motorcycle parking (4no. bays) is also provided in the basement of the apartment blocks.

**Table 1 Key Development Statistics**



#### 4.0 MATERIAL CONTRAVENTION

- 4.1 As noted above, section 9(6) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended) sets out in summary that 'where the proposed strategic housing development would materially contravene the development plan...then the Board may only grant permission in accordance with paragraph (a) where it considers that, if section 37(2)(b) of the Act of 2000 were to apply, it would grant permission for the proposed development.'
- 4.2 The proposed development site is located within the development boundary of Blarney, which is included in the Municipal District of Blarney-Macroom and is therefore subject to the policies and objectives contained within the Blarney-Macroom Municipal District Local Area Plan, 2017.
- 4.3 The site<sup>1</sup> benefits from a specific zoning objective BL-R-03, (highlighted in yellow in Plate 2 below) which is outlined as follows:

*Medium B Density Residential Development including detached dwellings, limited to the lower portion of the site. The upper part of the site, closer to the ridge, is generally unsuitable for development and should be retained as open land uses with long term strategic planting as part of the overall scheme.*



**Plate 2 Extract from Blarney Land Use Zoning Map (site generally identified in red)**

- 4.4 A Medium B Density is defined in objective HOU 4-1 of the Cork County Development Plan 2014 as being within the range of 12-25 units/hectare. The proposed development equates to a density of 35 units/hectare.
- 4.5 It is submitted that there is sufficient justification for An Bord Pleanála to grant permission for the proposed development even if the Board consider that the proposal materially contravenes the zoning objective BL-R-03 in respect of the proposed density of 35 units/hectare.

<sup>1</sup> The access road forms part of the Existing Built Up zoned area of Blarney

4.6 We set out our case hereunder in respect of Section 37(2)(b) of the Planning and Development Act 2000 (as amended) states the following in relation to material contravention:

*(a) Subject to paragraph (b), the Board may in determining an appeal under this section decide to grant a permission even if the proposed development contravenes materially the development plan relating to the area of the planning authority to whose decision the appeal relates.*

*(b) Where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may only grant permission in accordance with paragraph (a) where it considers that—*

- i. the proposed development is of strategic or national importance,*
- ii. there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or*
- iii. permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or*
- iv. permission for the proposed development should be granted having regard to the pattern of development*

4.7 The following sections will set out how the proposed development can be supported in the context of Section 37(2)(b)(i) and (iii) of the Planning and Development Act, 2000, as amended.

4.8 *Section 37(2)(b)(i) - The proposed development is of strategic or national importance*

4.8.1 The proposed development, being a strategic housing development of 100 units +, is of strategic importance. In the context of a widely acknowledged imbalance between housing supply and demand in the country, reflected in increased house prices and rents, and concerns for the resultant negative impact on Ireland's economic competitiveness, the proposed development constitutes a strategic housing development of 143no. residential units (houses and apartments) in a sustainable location in Blarney, within the expanded Cork City boundary, in the vicinity of existing and proposed public transport networks and social and community facilities.

4.8.2 The NPF states that *between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people's needs for well-located and affordable housing, with increasing demand to cater for one- and two-person households. Within this figure, there is a wide range of differing housing needs that will be required to be met.* (Section 6.6, page 91, NPF).

4.8.3 The proposed development will contribute to the densification and compact growth of Cork and will assist in delivering increased population in the City, in line with National Policy Objective 1b, and National Policy Objective 3b of the National Planning Framework, 2018. As illustrated in Table 2.1 of the NPF, of the regional cities outside Dublin, Cork is expected to grow the most, by up to 125,000 people to 2040.

4.8.4 To accommodate this anticipated increase and to achieve a compact city, the NPF places an emphasis on the



potential of sites in key locations that are accessible by public transport, serviced and have access to established community facilities, again, such as the proposed development site. Specifically, the proposed development will:

- Deliver additional residential development within the built-up footprint of Blarney (NPO3a);
- Deliver additional residential development within the built-up footprint, i.e. the development boundary, of the Urban Town of Blarney within Cork City (NPO3c);
- Deliver increased population and support existing amenities, as well as providing a new 42 child creche, in Blarney (NPO 6);
- Deliver additional population (c. 400no. persons) in the existing town of Blarney (NPO 11);
- Support a reduction in the use of the car in favour of walking and cycling, and enhance the use of an existing frequent public transport service, which has capacity, and support the proposed investment in public transport in Blarney through BusConnects (NPO 27);
- Facilitates a diverse and social inclusive society with a mix of house and apartment types, including 29no. Part V housing units (NPO 28);
- Will contribute to the delivery of the additional households required by 2040 (NPO 32);
- Provides new homes in a location that supports sustainable development (NPO 33); and
- The proposed development supports the provision of lifetime adaptable homes (NPO 34).

4.8.5 In addition, the NPF identifies the progression of the sustainable development of new greenfield areas for housing, especially those on public transport corridors. In this respect, the proposed development site is located only 430m from the existing half-hourly 215 bus route that connects the proposed development site to the City Centre and Mahon. This bus route has capacity. The nearest bus stop is no more than 10 minutes' walk from the proposed development site (6-8 minutes from the site entrance of the proposed development).

4.8.6 In this context, the proposed development therefore satisfies the requirements of the NPF in seeking to achieve increased density and a compact city for Cork, and as such is consistent with national planning policy.

4.8.7 The proposed development responds to the widely acknowledged national imbalance between housing supply and demand in the country, by providing an additional 143no. residential units of varying sizes in a sustainable location in the identified growth location of Cork City.

4.8.8 More recently, the Government's Housing for All Plan 2021 sets ambitious targets to increase housing supply to an average of at least 33,000 new units per year over the next decade, to include over 10,000 social homes each year over the next five years, in order to reverse the decline in home ownership and increase affordability, eradicate homelessness and increase social housing delivery as well as increasing new housing supply. The proposed development of 143no. residential units will contribute directly to the achievement of the Pathway to Supporting Home Ownership and Increasing Affordability, by increasing supply. The proposed 29 no. housing units are to be transferred to Cork City Council in order to meet the developments Part V obligations will also contribute to the Pathway to Increasing Social Housing Delivery and Supporting Social Inclusion.

4.9 *Section 37(2)(b)(iii) - Permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government*

4.9.1 The proposed density is supported by the following national and regional guidance:

- The Regional Spatial and Economic Strategy (RSES) for the Southern Region outlines the settlement typology for the Region in Table 3.2 of the Plan and Metropolitan areas, such as Blarney, are identified in the first tier of the typology. The proposed development will deliver 143 no. residential units within the Metropolitan area of Blarney and within the City Boundary, therefore increasing the population of both the city and metropolitan area, and consequentially will help in achieving Strategy no. 1 of the RSES.
- The RSES also include a Metropolitan Area Strategic Plan (MASP) for Cork. Section 7.3 relates to strategic residential and regeneration areas, where it is noted that there is a potential housing yield of 3,555 in Blarney. The proposed development of 143 no. units will assist in achieving this housing yield.
- The general advice of section 6.3 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) is also pertinent, specifically:
  - *New development should contribute to compact towns and villages:* In this instance the development of a suitably located backland, zoned, greenfield site, with pedestrian and cycle connectivity maximised as far as possible having regard to the site's characteristics and context, will contribute to the delivery of a compact town;
  - *Higher densities are appropriate in certain locations:* In this instance the proposed development is located on a residentially zoned site in the Metropolitan Town of Blarney within the extended City boundary that is located:
    - only 430m from the half-hourly 215 bus route to the City Centre (see Plate 3 below) which frequency is equivalent to the half hourly Cork commuter rail service. This bus service has capacity (see report Bus Service/Bus Capacity Assessment prepared by NRB Consulting Engineers included with this application). The nearest bus stop is no more than 10 minutes' walk from the proposed development site (6-8 minutes from the site entrance of the proposed development);
    - on the proposed Cork Bus Corridor and BusConnects routes (see Plates 4 and 5 below);
    - the proposed Cork Cycle Network (see Plate 6 below), and
    - within reach of the proposed Blarney rail station on the existing suburban and intercity rail line (see Plate 7 below).
  - *Offering alternatives to urban generated housing:* In this instance, the proposed development offers a good mix of quality housing in a high quality layout with plentiful, usable open space, connectivity, and privacy, at the edge of, and within the development boundary of, Blarney Town, close to existing amenities, as a very competitive and sustainable alternative to urban generated rural housing in the Metropolitan Cork greenbelt, which is under significant pressure for rural housing;
  - *The scale of new residential schemes for development should be in proportion to the pattern and grain of existing development.* In this instance, the layout of the proposed development references the pattern of existing residential development to the immediate east at Sunberry Drive and Castleown, and development under construction at Cluain Ard to the north-east (on the site zoned BL-R-02 in Plate 2), without impact on the architectural, heritage and environmental qualities of the Town. residential development to the

immediate east at Sunberry Drive and Castleown, and development under construction at Cluain Ard to the north-east (on the site zoned BL-R-02 in Plate 1), without impact on the architectural, heritage and environmental qualities of the Town. The recent mixed use and Primary Care Centre developments permitted by An Bord Pleanála under ABP-309152-21 and ABP-308670-20 respectively, to include a hotel and residential development of up to 4 storeys on the site of the former Blarney Park Hotel in the immediate vicinity of Blarney Castle were so granted on the basis that they would not seriously injure the character of the nearby Blarney Architectural Conservation Area, and that, in the context of policy objective GO-06 which requires that development does not compromise the landscape and heritage character of the area, the proposed development were not in material contravention of the local plan are would not compromise the landscape and heritage character of the area.

- Furthermore, the advice of section 6.4(i) of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), requires Planning Authorities to ensure that the development of small towns within 45minutes-1 hour travel of major cities, as is the case with Blarney and its location relative to Cork City, is aligned with national and regional policy to build up the critical mass of key towns.
- The advice of section 6.11 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), advocate densities to a range of 20-35 units/hectare on edge of centre sites, to include a wide variety of house types, from detached dwellings to terraced and apartment style accommodation. The proposed density is within this range, and a wide variety of house types are proposed, including detached houses, terraced houses and apartments.
- In relation to Circular NRUP 02/2021 (Residential Densities in Towns and Villages) dated 21 April, 2021, Blarney, which has a current population (2016) of 2,550 persons and a projected population of 5,881 (2028: Table 2.2 of the Core Strategy of the draft Cork City Development Plan 2022-2028), can be currently defined as a Small Town with a population of up to 5,000 persons. As is referenced above, on edge of centre sites such as the proposed development site, a density of 20-35 units per hectare is supported in the Circular. The proposed density accords with this advice. Equally, the Circular cautions against large scale, rapid development that may overwhelm or detract from the quintessential character of towns. In this respect, the proposed development of 143no. units is, as endorsed by the Inspector on previous application register reference ABP-308156-20, of modest scale (section 10.6.11 of the Inspector's Report), on lands that have been zoned for residential development for some time, which provides a mix of dwelling types, and is predicated on the character and layout of the adjacent Sunberry Drive and Castleown housing estates in the vicinity and references the recently permitted and under construction residential development at Cluain Ard to the north-east. The Circular also notes that, in respect of Development at the Edge of Larger Towns, which Blarney would be classified as if it reaches its projected population by 2028, densities should be in the range of 35-50 dwellings per hectare, with net densities of less than 30 dwellings per hectare generally discouraged, particularly on sites of over 0.5ha. The net developable area of the proposed development site is 4.1ha.
- Furthermore, the advice of section 2.4 of the Apartment Guidelines 2018 would indicate that the proposed development site, being located in Blarney Metropolitan Town on the edge of Cork City, but within walking distance of a frequent bus service, would fall to be considered between an 'intermediate

urban location' and a 'peripheral urban location', where a medium-high density development including apartments would generally be suitable.

- In addition, the Urban Development and Building Height Guidelines 2018, which promote, via Specific Planning Policy Requirement (SPPR) 4, the minimum densities of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) on suburban greenfield/edge of town sites.

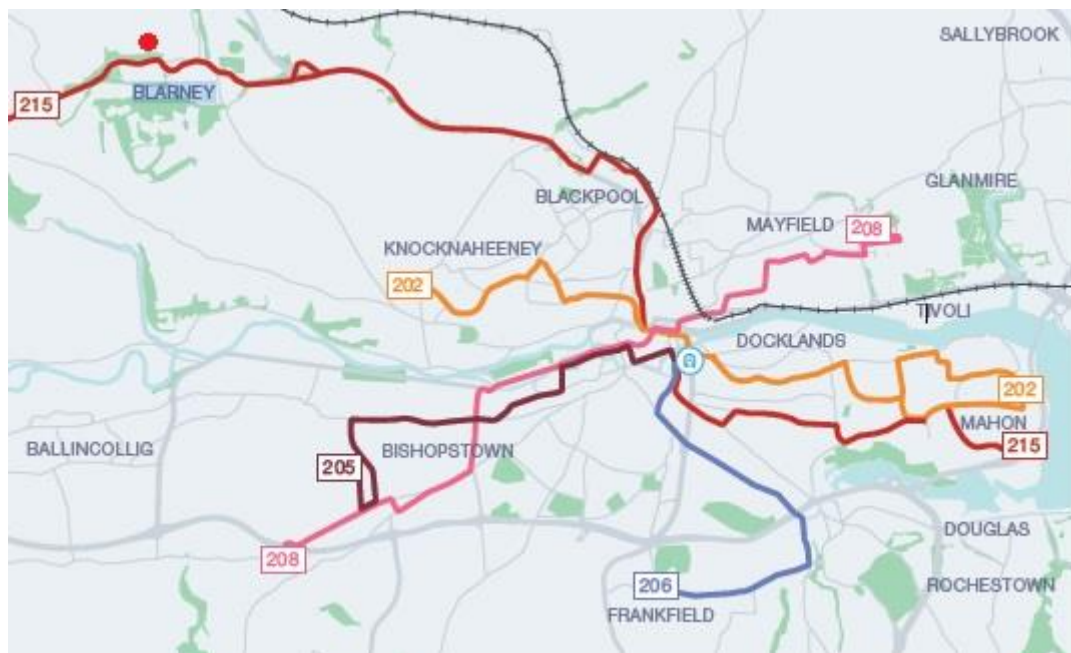


**Plate 2 Proposed development site (in purple) relative to local amenities**

- Furthermore, the Sustainable Urban Housing: Design Standards for New Apartments 2018, also endorse the need to consolidate urban development within the five existing cities. The Guidelines identify the types of locations in cities and towns that may be suitable for apartment development, and increased densities. The proposed development site can be defined as a central and/ or accessible urban location capable of satisfactorily accommodating more intensive residential development, being located within walking distance of a frequent bus service that has available capacity.
- It is also noted that the status of Blarney as a Metropolitan Town (and its inclusion in the expanded City boundary) in the Core Strategy of the Cork County Development Plan 2014, for which the strategic aim, as elicited by Objective CS 3-1 of the Plan, is a *critical population growth, service and employment centre within the Cork Gateway, providing high levels of community facilities and amenities with infrastructure capacity, high quality and integrated public transport connections; should be the location of choice for most people especially those with an urban employment focus.*
- Figure 2.3 of the Plan identifies a population target of 7,533 people to 2022 (a growth of 5,096 people from 2011) in an additional 2,566 housing units. The proposed development of 143no. residential units,

which could be occupied by up to 400 people (based on the average family size of 2.8 for Cork County (2016 census)), will make a contribution to this population and housing target.

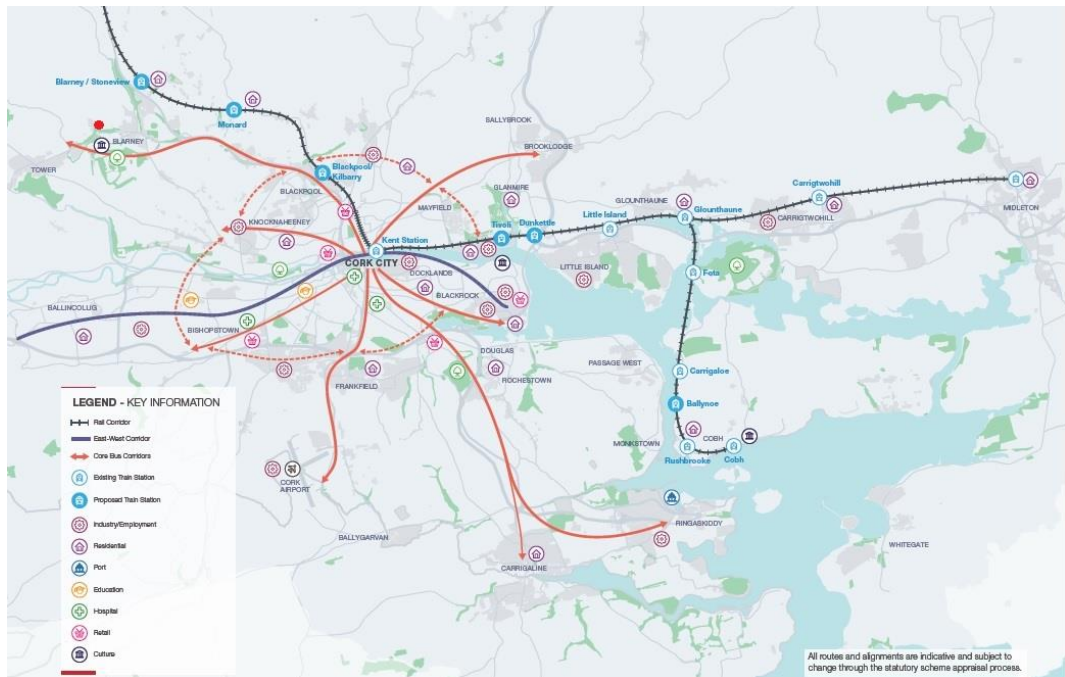
- Furthermore, the proposed development site is located within walking distance of the resources and amenities of Blarney Town including, but not limited to:
  - Local recreational amenities including the Ardmadame Wood Walk, Blarney Bog & wetland walk (also known as Clogheenmilcon Sanctuary Loop), Blarney Running Trail, Blarney Village Green, Blarney GAA, and Blarney Pitch & Putt, as generally illustrated in Plate 3;
  - Local schools, including 3no. primary schools (Scoil Chroí Iosa; Gaelscoil Mhuscraí; and Cloghroe Mixed National School); and 1no. secondary school (Colaiste Muire secondary school, for which planning permission is in place to increase the capacity of the school from 525 to 1,200 pupils);
  - Local tourism resources including Blarney Castle and gardens and associated uses and Blarney Woollen Mills complex;
  - Local shops, including 2no. Centras; cafes and restaurants; local doctors; local services; and local churches; and
  - Local bus stops on the existing 215 bus route, as defined in CMATS (Cork Metropolitan Area Transport Strategy) 2020 (an excerpt of which is illustrated in Plate 3 below), from Tower-Mahon via the City Centre route, noting that the nearest bus stop is only 430m from the proposed development site, and has available capacity.



**Plate 3 Proposed development site relative to the existing 215 bus route (CMATS 2020)**

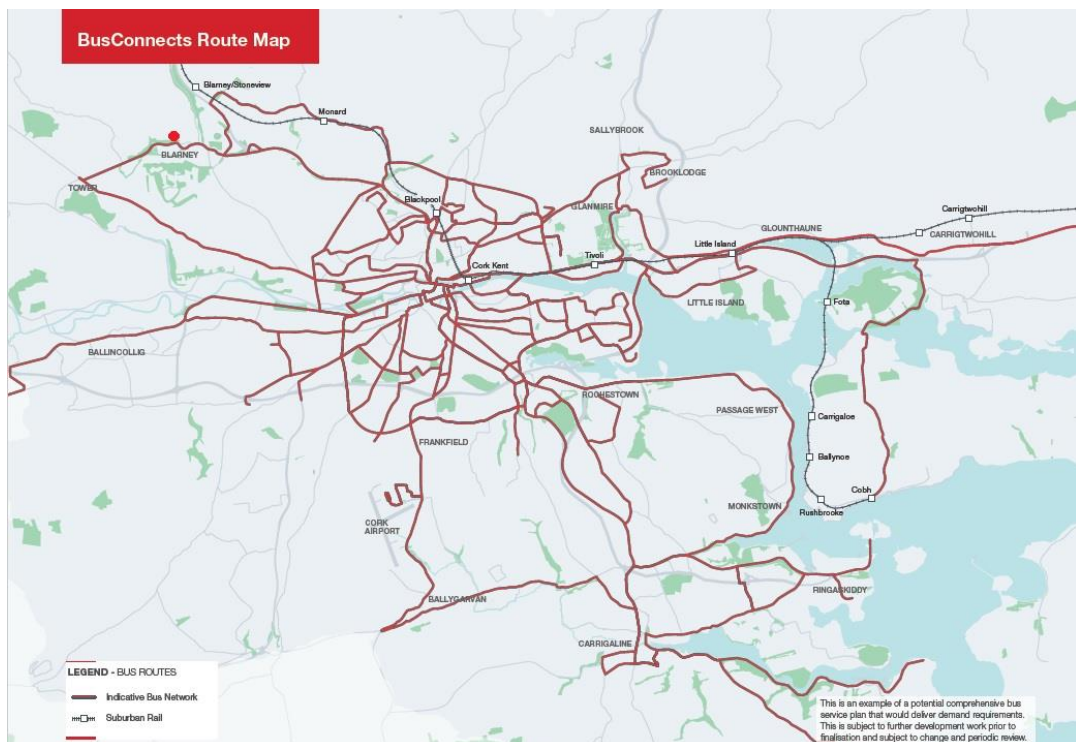
- The location of the proposed development site relative to the proposed Core Bus Corridor proposed in CMATS, as illustrated in Plate 4, is also relevant to the justification for the proposed density.





**Plate 4 Proposed development site relative to the proposed Cork Bus Corridor for Blarney (CMATS 2020)**

- The location of the proposed development site relative to the BusConnects route map, as illustrated in Plate 5, is also relevant to the justification for the proposed density.

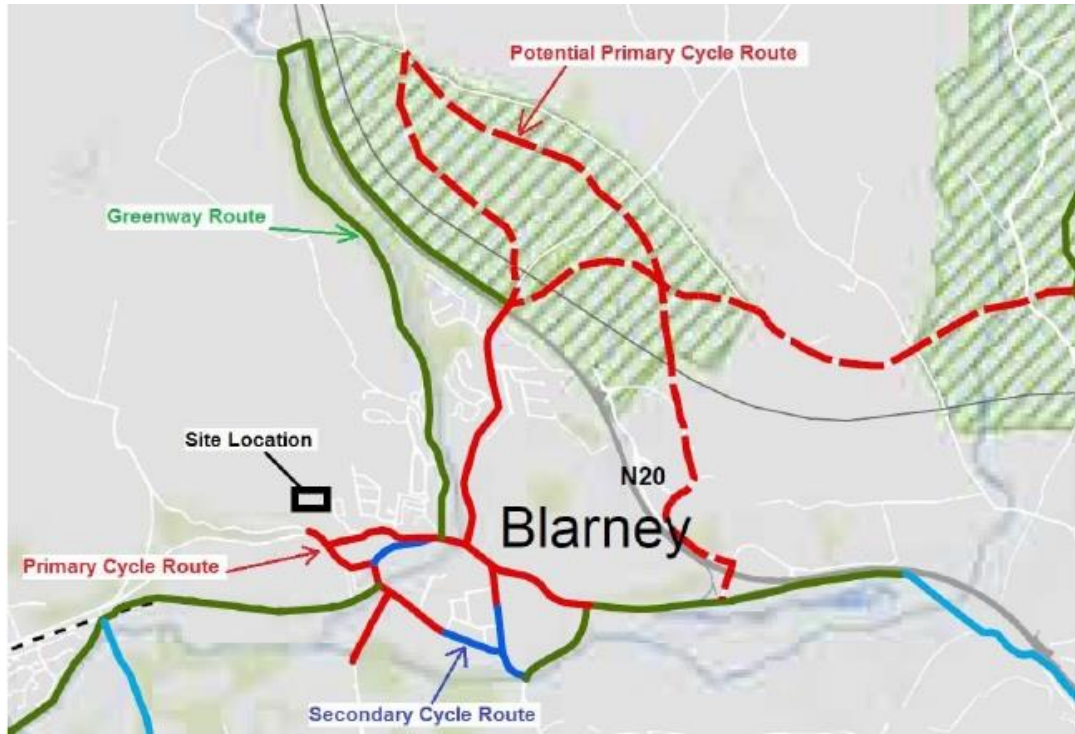


**Plate 5 Proposed development site relative to the proposed BusConnects Route Map (CMATS 2020)**

- The location of the proposed development site relative to the proposed Primary Cycle Route in the Cork Cycle Network Plan 2017, as carried through into CMATS, as illustrated in Plate 6, is also relevant to the justification for the proposed density.



- o The location of the proposed development site relative to the proposed suburban rail line at Blarney, as illustrated in Plate 7, is also relevant to the justification for the proposed density.



**Plate 6 Proposed development site relative to the proposed Cycle Network for Blarney**



**Plate 7 Proposed development site relative to the proposed Suburban Rail Line for Blarney**

4.9.2 The proposed density is considered to be entirely appropriate and fully justified in the context of the existing and proposed amenities and public transport, in particular the location of the proposed development site relative to the existing 215 bus route to the City.

4.9.3 While not adopted, it relevant to note the provisions of the draft Cork City Development Plan 2022-2028, which:

- retains a residential zoning objective for the entire site,
- identifies the lands as Tier 1, to be brought forward for residential use in the short-term,
- is capable of accommodating a residential density of up to 50 units/ha in principle<sup>2</sup>, and
- can support buildings of up to 3 storeys in height.

4.9.4 It is noted that objective HOU 4-1 of the Cork County Development Plan 2014 states that densities between 25-35 dwellings/ha will be considered where an exceptional market requirement has been identified.

4.9.5 It is also noted that the draft Cork City Development Plan 2022-2028, Table 11.9 sets out the Dwelling Size Mix for Housing Developments in Urban Towns such as Blarney, to be achieved over the lifetime of the Plan as follows:

	Min	Max	Target
<b>Studios / PBSA</b> (at LRT Stops / Urban Centre Only)	0%	5%	0%
<b>1 Bedroom</b>	15%	25%	21%
<b>2 Bedroom</b>	30%	40%	34%
<b>3 Bedroom</b>	25%	35%	30%
<b>4 Bedroom / Larger</b>	10%	20%	15%

**Table 2 Dwelling Size Mix for Housing Developments in Urban Towns**

4.9.6 Objective 11.2 of the draft Plan states that:

*All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances. Applications for 10-50 dwellings will need to provide a dwelling size mix that benefits from the flexibility provided by the dwelling size target ranges provided for the respective sub-area. Purpose-Built Student Accommodation schemes will be exempt from dwelling size mix targets. Where there is a target for student accommodation, and it can be demonstrated that this demand has been provided for within the area, then this demand can be reassigned to other dwelling sizes according to the relative target proportions. Where a clear justification can be provided on the basis of market evidence that demand / need for a specific dwelling size is lower than the target then flexibility will be provided according to the ranges specified*

4.9.7 The proposed housing mix is set out in Table 3 below.

<sup>2</sup> In its formal submission to the draft Plan, it is noted that the OPR has advised that the proposed the density standards for Blarney (at 25 to 50 units per hectare) are low and inconsistent with the Guidelines. It is recommended in the Chief Executive's report on the submission to the draft Plan (December, 2021) that the minimum densities for Blarney are adjusted to comply with the s.28 Guidelines.

No. of Beds	No. of Units	%
4 bed	26	18%
3 bed	71	49.5%
2 bed	38	26.5%
1 bed	8	6%
TOTAL	143	100%

**Table 3 Breakdown of bedrooms by percentage**

4.9.8 The proposed dwelling mix set out in Table 3 above generally conforms to the targets of the draft Plan in respect of 4 bed units, where 18% are proposed. There is a good mix of 1, 2 and 3 bed units proposed, that will lead to a balanced community at the proposed development site.

4.9.9 In the context of objective HOU 4-1 of the Cork County Development Plan 2014 and Objective 11.2 of the draft Cork City Development Plan 2022, the market report prepared by Cushman & Wakefield (2022), attached as an appendix to this Statement, reveals that:

- Noting that there is a decline in completions and commencements of new builds in 2020 and 2021 arising out of the current pandemic, the report states that between 2020-2025, demand for housing nationwide is likely to be c. 47,000 units/year;
- The ESRI report (2020) estimates a longer-term requirement for 33,000 residential units per year, and indicates that the bulk of new homes for smaller households will be needed in locations in or near the main cities, including Cork;
- The Housing for All Plan (2021) pledges to deliver 33,450 homes in 2024 and 40,500 a year by 2030;
- As Ireland's average household size converges towards the European average, there will be significant demand for housing for smaller homes i.e., between 1-3 bedroom units;
- 30,700 new residential units commenced in 2021, however the overall volume of units under construction in the regions remains low against the estimated annual levels of demand in each region;
- Blarney is identified as an Urban Town in the draft Cork City Development Plan 2022 as one of 4no. Urban Towns in the city, and the City Capacity Study indicates that the 4 Urban Towns have the largest total area of underutilised and undeveloped land identified.
- In the current Cork County Development Plan 2014, Blarney is identified as a Metropolitan Town, with a population target of 7,533 people to 2022 (against a current population of c. 2,500 (2016)), in an additional 2,566 housing units. This population and housing uplift has not been delivered as a consequence of delays in progressing Stoneview for primarily infrastructural reasons. It is noted in the report that other residentially zoned lands, including the subject site, are available in Blarney to achieve the projected population and housing growth. It is also noted that while Blarney has a higher than average Labour Force Participation Rate, there is a low level of social housing stock in the town, with clear room for further expansion;
- The report also points out that in Blarney there is currently only 17 residential units (14no. houses and 3no. apartments) available to purchase, which, when measured against the population uplift to 7,533 people requiring an additional 2,566 new housing units to 2022, demonstrates how acute the lack of supply in Blarney is. Of this 17no. units, 3no. are 2-bed; 8no. are 3-bed; 5no. are 4-bed; and 1no. is 6-bed, suggesting an underprovision in 1 and 2 bed units.
- In addition, the report details evidence of demand for housing developments that are currently under construction in the Blarney area, including Barter's Wood, Cluain Ard, Glenn Rua, Clonlara and Lia Fail,

with the 54-unit development (3 and 4 bed units) at Barter's Wood sold out by November, 2020; Cluain Ard (78no. 2, 3 and 4-bed units) sold out in 2021 over 3 phases; Glenn Rua (28no. 2, 3, 4 and 5-bed units) and Clonlara (144no. 3 and 4-bed units) which has sold out; and Lia Fail (12no. 4-bed units) with only 2no. units remaining (as at February, 2022). This evidence confirms the level of demand for new housing in Blarney.

- The report also notes that the mixed use scheme and Primary Care Centre recently permitted under ABP-309152-21 and ABP-308670-20 respectively will result in the provision of additional hotel, café, office, convenience retail and retail services, as well as new employment opportunities for Blarney, underpinning the need for further residential development to sustain and support these new services and employers, and strengthen the built up area of Blarney within the development boundary in line with national, regional and local planning policy for compact, sustainable growth.
- Furthermore, a May, 2021 Sherry Fitzgerald report found that 83% of first time buyers stated their preference to relocate to a town, village or suburb.
- In addition, homeworking will become a permanent feature for many people – in this respect the proposed development provides work from home space where possible.

4.9.10 In this context, the proposed development, which provides a range of new homes, from smaller 'starter' homes to family homes, including 3no. detached, 42no. semi-detached, 60no. terraced houses, and 38no. apartments, consisting of 8no. 1-bed (5%); 38no. 2-bed (27%); and 97no. 3 and 4-bed units (68%) is considered to be appropriate with respect to housing mix, having regard to demand, and the policy environment within which the proposed development is framed. The proposed housing mix will ensure a balanced community is delivered at the site that will meet current evidenced demand for housing in Blarney.

## 5.0 CONCLUSION

5.1 In conclusion, as demonstrated in this statement,

- the proposed development is of strategic importance as a strategic housing development, and it will contribute to an increased supply of residential accommodation in line with the National Planning Framework and the Housing for All Plan where there is evidence of demand and an acute shortfall in supply, and
- permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government.

5.2 In this context, it is our submission that the Board can grant planning permission for the proposed development in accordance with Section 9(6)(c) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended), and Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).

## APPENDIX

### CUSHMAN & WAKEFIELD ADVISORY REPORT





**CUSHMAN &  
WAKEFIELD**

**Advisory Report:**  
**Blarney Housing Requirement**

Prepared for  
**Eoin Sheehan**

Report Date: February 2022



<b>TABLE OF CONTENTS</b>	<b>PAGE</b>
1. Introduction .....	2
2. National Housing Supply .....	2
3. Blarney Housing Supply.....	3
4. Housing Demand.....	4
5. Housing Requirement Outlook.....	5

## 1. Introduction

This report sets out the market context for the proposed SHD development at Monacnapa, Blarney, Cork. The proposed development will consist of 143no. residential units (8no. 1-bed; 38no. 2-bed; 71no. 3-bed; and 26no. 4-bed units), comprising 105no. houses (3no. detached; 42no. semi-detached; and 60 no. terraced units) and 38no. apartments (8no. 1-bed apartments and 30no. 2-bed apartments) on a 7.79ha (19.25 acre) site.

## 2. National Housing Supply

There has been a well-documented decline in both completions and commencements of new builds in 2020 and early 2021 due to the pandemic, and as a consequence the supply of housing stock in the year fell well short of expected current and pent up demand. Commencement activity has since been fast paced since the large scale lifting of public health restrictions on construction sites with sales activity bouncing back from 2020, however, activity in the new homes market is still short of what it was in 2019. This was a result of fewer new developments having been brought to the market in the year due to the public health measures, as well as increased acquisitions of new homes by public bodies for social housing.

The industry body Irish Institutional Property (IIP) suggests demand for housing nationwide is likely to be roughly 47,000 units per year between 2020 - 2025. The IIP suggests the main drivers of housing demand in the coming years will be the natural increase in population, net migration and changes in household size. It estimated that 30,000 homes a year are needed to meet the likely population changes alone.

Research also carried out by the IIP found that Ireland has Western Europe's highest average household size, but it has been falling steadily over the last five decades. Two-thirds of the growth in Irish households since 1996 has been in the 1-2 person households cohorts, who now form the majority of households in Ireland. As Ireland's average household size converges towards the European average, this will create significant demand for housing, especially for smaller homes, 1 – 3 bedroom unit. If Ireland's average household size were to move to the European average today, the housing stock would need an additional 300,000 units.

The Economic and Social Research Institute (ESRI) conducted some research towards the end of 2020 which was funded by the Department of Housing, Local Heritage and Government, which pointed at a longer-term requirement for 33,000 residential units per year. The report also noted that over the period to 2040, it is thought that life expectancy for men will improve from 79.3 to 84.3 years, while for women it will increase from 83.3 to 87.1 years.

Fertility rates though are predicted to drop from 1.8 to 1.6 over the next decade and then remain steady from that point on. A net inflow of 15,000 or more people through migration is projected if a "business as usual" scenario continues. In these circumstances, the ESRI calculates that the population will rise by 926,000 from 2016 to 2040. This will result in the total population reaching 5.665 million. But if net immigration were to reach 30,000 a year, then the population could top 6m by 2040.

The ESRI report indicates that the bulk of new homes are needed for smaller households and in locations that are in and near the main cities. Dún Laoghaire-Rathdown, Meath, Kildare and Cork City are the local authority areas where demand for new housing is set to be highest relative to their population shares.

The Government have just launched its ambitious Housing for All plan to tackle the national housing crisis. The plan represents the largest State building programme in the country's history, promising 312,750 new homes between 2022 to the end of 2030. Ninety thousand of these will be social housing, let by local authorities, or housing bodies, along with 53,800 affordable and cost rental homes will be built, too. In all, 170,550 will be privately-owned, or rented.

The Housing for All plan pledges to go further than the ESRI's estimated 33,000 new homes every year by delivering 33,450 homes in 2024 and 40,500 a year by in 2030.

The extensive Housing for All plan consists of 230 actions which particularly target first time buyer, renters, low-income households, older people, and homelessness. It is estimated that around 27,500 additional construction workers will be needed to meet completion targets.

Implementation measures include a shared equity scheme which will be available first-time buyers of new builds in private developments. The scheme will see the State take up to a 30pc stake. Buyers will take out a mortgage with a bank for the remainder of the cost. A cost rental plan will also be introduced where the tenant pays rent which covers the cost of building the home. These rental properties will have rent targets of at least 25pc below market level. The 'Fair Deal' scheme for people in long-term residential care will be reformed to enable applicants to rent or sell their property without sanction. The Government will hope to use the State land bank to provide up to 15,000 homes. The State will fund local authorities for land acquisition. A new Croí Cónaithe (Towns) Fund is to be established for the provision of serviced sites for housing.

Overall, 30,700 new residential units commenced in 2021, according to figures from the Department of Housing, Local Government and Heritage (DHLGH). While this is in line with the ESRI's estimated annual requirement, it should be noted that Dublin and the Mid-East region accounted for 61% of all commencement activity. Although, the number of units commenced in almost every region is ahead of their 2020 totals, the overall volume of units under construction in these regions remains low against the estimated annual levels of demand for each region.

### 3. Blarney Housing Supply

Blarney with a population in the order of 2,500, is situated 8km northwest of Cork City Centre, just off the N20. It is an iconic tourist centre with a range of tourist related facilities including Blarney Castle and Blarney Woollen Mills and also acts as a service centre for the locality.

On May 31<sup>st</sup> 2019, Cork City grew to nearly five times its previous size taking in areas including Douglas, Rochestown, Ballincollig, Blarney and Glanmire. As part of this planned expansion, the population of the city grew by 85,000 to 210,000 people. The increase in the size of the city must fall in line with driving improvements in investment, public transport, infrastructure and housing.

In the Draft Cork City Development Plan 2022 – 2028, Blarney is one of the four Urban Towns within the city, the others being Ballincollig, Tower and Glanmire. The four Urban Towns account for 16% of the City's population.

The new Draft City Development Plan represents an important step in the strategic planning of the City against the backdrop of a new national and regional planning context. The direction of the future development of Cork City is guided by the National Planning Framework, Regional Spatial and Economic Strategy, Cork Metropolitan Area Strategic Plan and the Cork Metropolitan Area Transport Strategy. These set clear objectives for the population of Cork City to grow by 50% to 335,000 by 2040.

Cork City Council undertook a City Capacity Study to help identify parcels of lands currently zoned, both within the built-up area and 'greenfield' land, that have development potential. Collectively the four urban towns of Ballincollig, Glanmire, Blarney and Tower have the largest total area of underutilised and undeveloped land identified and are likely to be identified as key locations for new housing in the new plan.

The total housing stock in Cork City is predominantly made up of owner-occupied housing (58%), with the combination of private rental (24%) and social housing (14%) accounting for less of the overall share (census 2016). Regarding the total of stock of social housing Blarney has a lower level, generally below 4%. While

there has been some commitment by the council to complete social housing units in Blarney, including 18 dwellings at Woodford Estate, there is clearly room for further expansion here.

The Labour Force Participation Rate (LFPR) in Cork City's was 59% (2016 census), being slightly below the national average. The Urban Towns of Ballincollig, Tower, Blarney and Glanmire have a higher than average LFPR, reflecting higher concentrations of young working families. In Blarney's case the short commute to the city centre yet within a village setting will be attractive to young families.

Blarney is identified as a Metropolitan Town in the Core Strategy of the Cork County Development Plan 2014, for which the strategic aim, is as a critical population growth, service and employment centre within the Cork Gateway. The Plan identifies a population target of 7,533 people to 2022 (a growth of 5,096 people from 2011) in an additional 2,566 housing units. The significant population and housing growth projected for Blarney has largely failed to materialise due to the infrastructural constraints preventing the development of the urban expansion area at Stoneview and Ringwood lands. However, there are other residential zoned lands within the Blarney area that will help meet development plan population and housing targets, such as the proposed development site.

At present, on daft.ie there are only 17 residential units available to purchase in Blarney and the surrounding area consisting of 3no. 2-bed; 8no. 3-bed; 2no. 4-bed; 3no. 4-bed units and 1no. 6-bed, comprising 14no. houses (7no. detached; 6no. semi-detached; and 1no. townhouse) and 3no. apartments (2no. 2-bed apartments and 1no. 3-bed apartment). The total of 17 residential units available is in no way adequate for the level of demand for the Blarney area.

## 4. Housing Demand

Supply was chronically low prior to the pandemic, the repeated lockdowns needed for public health during 2020 greatly aggravated the issue, as it stopped the construction of new homes and inhibited second-hand units being brought to the market for sale. According to Sherry Fitzgerald findings, in January 2021 just 15,500 second-hand units were available for sale nationally, almost 5,000 fewer units, or 24% less, than the year before. Furthermore, the prolonged lockdown in the opening months of 2021, saw a further deterioration in this situation as again new homes output and second-hand listings were reduced.

Increased demand combined with persisting supply constraints has led to a further acceleration in the rate of house price growth with average second-hand home values rose by 9.6% in 2021 nationally. In Dublin, values grew 7.2% in the year but outside of Dublin average values nationally rose 12.9% over the same period.

The buyer profile in Cork is generally people employed in IT, ICT, Pharma FDI companies and/or Civil Servant type jobs who have been relatively unaffected by the economic issues arising from the pandemic. Consumer confidence remains relatively high for housing and buyers have in some cases saved money over the last number of months.

A large band of purchasers are solely focusing on New Homes this is due to many factors such as the running cost savings based around the A energy rating, higher specifications, structural guarantee and being able to put their own stamp on the home.

The Sherry Fitzgerald Residential Market Review 2021, Outlook 2022 stated that nationally in the first eleven months of 2021, a total of 40,070 purchaser mortgages, which excludes top ups and re-mortgages, were approved according to Banking and Payments Federation Ireland (BPF). This signalled a 26.1% increase on the comparable period in 2020 and a 7.3% increase on the pre-pandemic period in 2019. Over that period the volume of first-time buyer mortgages increased by over a quarter compared to 2020 and by 14.1%



compared to 2019. The review also noted that in terms of the purchaser profile, 79% of all purchasers who bought second-hand homes through Sherry FitzGerald were owner occupiers. Approximately 32% of vendors were investors selling a property, whereas just 13% of purchasers were investors buying a property.

In a Blarney context the success of Barter's Wood, Cluain Ard, Glen Rua, Clonlara, Lia Fail and Gleann Fia have shown the exceptional market need for substantial additional housing in the Blarney area. The selling agent for the 54 unit development at Barter's Wood confirmed that there was massive demand for the houses. The development comprised of 8no. 4 bed detached; 26no. 4 bed semi-detached; 18no. 3 bed semi-detached and 2no. 3 bed bungalows. There were 4 phases of sales that commenced in October 2019 and completely sold out by November 2020, this is despite the pandemic being present for much of the sales period resulting in limitations or no viewing permitted to take place. Such was the demand that price increases were recorded at each advancing phase. Barter's Wood comprises 3 & 4 bedroom housing units.

The Cluain Ard development consists of 78 units with 2, 3- and 4-bedroom options (13no. 4 bed detached; 3no. 3 bed detached; 20no. 4 bed semi-detached; 28no. 3 bed semi-detached; 4no. 2 bed semi-detached; 6no. 3 bed terrace & 4no. 2 bed terrace). O'Leary & O'Sullivan Developments have confirmed that because of the sizable level of demand that all units are now sold. This development was sold over 3 phases. Another development by O'Leary & O'Sullivan was the 28 houses (5no. 5 bed detached; 18no. 4 bed detached; 1no. 3 bed semi-detached and 4no. 2 bed semi-detached) at Glenn Rua which was launched in 2018 and has sold out.

Sherry Fitzgerald are the selling agents for O'Flynn Construction's 144 house Clonlara development. Set in Kerry Pike near Blarney, the 3 & 4 bed A-rated homes (46no. 3 bed semi-detached; 34no. 4 bed semi-detached and 64no. 4 bed detached) also sold over multiple phases with price increases of approximately 5% at each phase. This large development is sold out.

Similarly, Lia Fail, an exclusive small development of substantial 4 bedroom detached family homes launched its first phase of 6 units in April 2020 with prices ranging €495,000 to €545,000. These units are completely sold out. Phase 2 which consisted of another 5 units was launch in mid-January 2022 with similar houses ranging in price between €620,000 to €650,000. There are only two units remaining in the development.

In Tower, Clancy Homes Glenn Fia development was launch by Harkin & Associates during December 2020. The development consists of 100 units comprising 59no.4 & 9no.5 bed detached and 32no. 3 & 4 bed semi detached to be completed over 5 phases. The first 3 phases consisting of 60 houses have been completely sold out. The fourth phase is due to launch during spring 2022. The selling agent has confirmed that there has been significant interest in these houses ever since the initial launch and the prices have increased through each phase.

## 5. Housing Requirement Outlook

The notable uplift in mortgage approvals in 2021 points to the persistence of demand in the months ahead. The last quarter saw the full reopening of construction and with this activity has greatly intensified. In April and May 2021, new residential commencements were at levels not witnessed since 2007. However, much work needs be done given that the gap between supply and demand remains vast and that the stock of properties for sale is still near to a decade low.

The announcement by the Government of its Housing for All plan and in particular the Shared Equity Scheme which will be available first-time buyers of new builds in private developments is hugely welcomed. First Time Buyers may be very active this year, and we could end up with a 'race to buy'. Blarney's location would be a popular choice for this cohort of purchasers if the suitable product is available. A May 2021 Sherry Fitzgerald report found that 83% of first time buyers stated their preference to relocate to a town, village or suburb.



Whilst the impact of Covid-19 will be temporary, some permanent lifestyle changes are happening. NZEB, Efficiency & cost to run, insulation and the green footprint are all key benefits of new homes. Working-from-home will become a permanent feature of life in Ireland for many people and so broadband speed, homework zones, flexible layouts, internal storage and better garden usage are now critical considerations for purchasers. Less commuting with lighter traffic and faster transit times are also key considerations.

We believe that Blarney is well positioned in terms of demand for future development. It is only a short commute from Cork City Centre yet has a rural setting. In Blarney, like in other locations, it is critical the price caps reflect viability relating to density, differing house typographies and the localities. There is evidence to support that additional social housing should be made available as well as small residential units of higher density in line with the IIP findings.

Recent grants of permission for a mixed use development and Primary Care Centre in Blarney permitted under ABP-309152-21 and ABP-308670-20 respectively will result in the provision of additional hotel, café, office, convenience retail and retail services, as well as new employment opportunities for Blarney, underpinning the need for further residential development to sustain and support these new services and employers, and strengthen the built up area of Blarney within the development boundary in line with national, regional and local planning policy for compact, sustainable growth.

Development plans including the Blarney Macroom Local Area Plan 2017 and the Cork County Development 2014 have pointed to a substantial population and housing increase for the Blarney area. The evidence supported by the sales at Barter's Wood, Cluain Ard, Glen Rua, Clonlara, Lia Fail and Gleann Fia show the exceptional market need for additional housing in the Blarney area. In the medium to longer term infrastructure and transport investment to peripheral areas like Stoneview will be suitable for large scale development. In the short-term development such as that proposed at Monacnapa will help satisfy existing market demand.

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