



Uimhir Thagarta Uathúil: CRK-C155-DEV21-295

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Aighneacht:

Submission to Draft Cork City Development Plan 2022-2028 -
Lands at Garranedarragh, Bishopstown, Cork

Comhairliúchán:

Draft Cork City Development Plan 2022-2028

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Ábhair: Zoning
Maps

Our client seeks to have her land at Garranedarragh and identified below zoned for new residential development.

This submission requests that 14ha is zoned for residential development in the Cork City

Development Plan 2022-2028 from its current zoning as Metropolitan Greenbelt. Our client's

land is suitable for residential development and should be rezoned for the following reasons:

- 1. There is an acute need for residential development within the city area.**
- 2. There is significant demand for housing; we are deep into a housing crisis, yet housing completions in Cork City are no greater than what they were in the early to mid 1970s (City Council's own figures).**
- 3. The Draft Cork Joint Housing Strategy and Housing Need Demand Assessment notes that the current property market cycle has been marked by a supply/demand mismatch. Under-supply has become a serious issue, particularly in key urban areas.**
- 4. Targets contained in the National Planning Framework, the Southern Regional Spatial and Economic Strategy, as well as very ambitious plans for sustainable transport and public transport infrastructure set out in the recently adopted Cork Metropolitan Area Transportation Strategy 2040 (CMATS) cannot be realized, including the southern distributor road, which is a key strategic objective for that regional (we emphasise) transport strategy, without development in this location.**
- 5. There is a Part 8 planning permission for access off the N71 into our client's site.**
- 6. The provision of access to our client's site, which will only happen if it is rezoned, will enhance the feasibility of development on the NAMA/Castlelands site. The existing zoning to the north and north west in this location requires the delivery of roads infrastructure that development from this requested zoning will assist deliver (ie**

our client can provide access for both our client's and the NAMA/Castlelands zoned lands) and potentially to the south and south east also.

7. If the southern environs is not developed much needed infrastructure for the existing population in this area by way of roads, public transport, sanitary services and enhanced access to the airport from the city will not be achieved nor will the long proposed and supported southern distributor road (SDR). There is therefore a consequential large swathe of potential development land stretching from the Bandon Road to the N27 Airport Road along with enhanced access to the airport (which is important for the City given its international aspirations to be a significant player on the global stage advocated in the Draft Plan).

8. Rezoning specifically facilitates a potential link road to the N27 Airport Road via Spur Hill and Lehenaghmore (a portion of which is the strategic public transport corridor designated as the Southern Orbital as outlined in CMATS). The link road, on its completion, would be an alternative route to the airport with the potential to alleviate some of the existing chronic traffic congestion at the Kinsale Road Roundabout Interchange during peak periods. The enhancement of access to the airport has been talked about for many years but not been delivered.

9. If the City Council do not want to open up the southern environs to development contiguous to existing development and want to resist the provision of additional roads we would ask that you carefully consider the access to and from the greenway as a means of reducing dependence on the car and promoting carbon neutral, active and health forms of transport. The subject site straddles the former rail line and no undeveloped site has better access to the greenway than our client's.

10. The site has the potential to be served by the proposed 'Greenway' on the old Bandon Road Railway Line which uniquely runs either side of our client's lands and which continues eastwards towards the Tramore Road within the confines of the extended city boundary. With the development of the zoned lands to the north of the subject site, pedestrian and cycle access to Dunnes Stores and to the N40 Cycle/Footpath network will be available. Pedestrian /cycle access to the adjoining residential estate to the west 'Eagle Valley' will also be provided. This is in accordance with CMATS which identifies the provision of this greenway as a key objective for the city. What more unique an amenity and attraction for both residents and tourists in Cork to provide sustainable and healthy pedestrian and cycle means of access could there be than to reopen the rail line for such purposes?

11. The proposed reuse of the abandoned rail line for pedestrian and cycle access is welcomed by our client and is consistent with not only Objective CL-U-13 of the adopted Ballincollig Carrigaline MD LAP 2017 but is also consistent with the Cork City Cycle Network Plan. This amenity would provide a strong and central cycle and pedestrian spine through development in the southern environs as envisaged in national and regional planning policy and guidance.

12. Population projections backload most significant population growth to the latter end of the period to 2040 meaning that housing is denied to significant numbers.

13. The City Council has decided to provide 65% of its future population growth in existing urban areas rather than the stipulated minimum of 50% set out in the NPF National Policy Objective 3b. This will severely constrain housing choice. The docklands is to receive a population increase of 364% as per Core Strategy population projections over the 6 year plan period. Whilst a significant increase in the dockland area is welcomed it should not be at the expense of reasonable and sustainable allocations elsewhere. Not everyone wants to live in an apartment and not everyone wants to live in the city centre, the docklands or in highly densified designated centres.

14. The environs are largely ignored for new housing and the southern environs and the Bishopstown area in particular. A young population is located in the vicinity of the subject site, in Bishopstown and Wilton, and growth is greater than in other areas of the city.

15. Bishopstown, was once and still is a thriving suburb of Cork City and should remain so and the greenway offers an unrivalled opportunity for further investment there. It should not exist in the shadow of substantial development and investment in Ballincollig. As indicated above the south west environs is particularly under-represented in population projections for the city.

16. These lands would be categorised as Tier 2 land in accordance with the NPF and provide an opportunity to deliver a consolidated residential development close to Bishopstown and the local centre.

17. If the City Council are true to the 15 minute city concept then they should consider the attractiveness of this site for rezoning as a planning priority given the proximity of University College Cork, Cork University Hospital, proximity to Wilton Shopping Centre, sports and recreational facilities, existing schools - all already within 15 minutes but expected to be brought closer to this site by the Greenway.

18. Return on City Council and national exchequer investment in the greenway can be maximised by the sustainable provision of development closest to it (ie matching planning with infrastructural investment as advocated in the National Development Plan and the National Planning Framework) and the provision of healthy and sustainable means of transport consistent with national transport policy, and agreed national actions on climate change, as well as tourism in the city.

19. No justifiable planning distinction can be made between our client's land that is zoned and that land within her ownership that is not zoned. The entire area of the subject site, straddling the greenway, should be zoned in the interests of the proper planning and sustainable development of the area.

20. The residential zoning of this site is consistent with the sequential approach to land use zoning and achievement of compact growth. Maximum benefit from the greenway can only be achieved from zoning land on either side of the former rail line. Rezoning both sides of the former rail line can ensure that the greenway becomes the fulcrum and centre piece for development in this area.

21. The establishment of this greenway needs to be more prominent in the emerging plan and receives only one indirect mention and has the potential to be not just a significant piece of sustainable transport infrastructure but will also be a significant tourism asset fundamentally changing how people get about the city and in particular the southern environs. It is incomprehensible that such an important piece of transport infrastructure perfectly aligned with CMATS, consistent with national cycling policy and the Cork Walking Strategy 2013-2028, which will encourage healthy lifestyles and which likely will redefine transport in the area and give a tremendous boost to tourism in the city as it has done in Waterford is not given more prominence in the plan. This greenway needs to be front and centre of the emerging plan and given at least equal billing to 'Lee to Sea'. We suspect that the Bandon to Cork greenway is not given prominence in the emerging plan, as it was in the adopted LAP, as it will redefine not just the *transport dynamic* in this part of the city to complement the roads based transport infrastructure granted under Part 8 and the provision of the southern distributor road, but will also redefine the *development dynamic* in the southern environs. This has not been considered adequately by the Council in respect of zoning and is a material consideration when assessing preferred locations for residential zonings.

22. The designation of part of our client's site as hinterland, where there is a wholesale presumption against development, negates any potential benefit to the expansion of the city boundary as recently as 2019.

23. The Council will be aware that planning permission has been granted last month by An Bord Pleanála under their reference TA28.310274 for Ardstone Developments at Ardrostig and Waterfall Road. The significance of the Board's decision is that the County Council's concerns about water supply identified in their Strategic Land Reserve Assessment in 2018 about development in this area being premature upon delivery of water supply upgrade is now considered unfounded. Similar unsubstantiated concerns were advanced by the City Council for previously resisting zoning on the subject lands and should not be advanced as reasons for resisting rezoning in this instance.

Ceangaltáin:

CRK-C155-DEV21-295-13052 - Final Submission to Cork City Draft Development Plan - Lands at Garranedarragh 041021.pdf