

Lands at Lee Road, Cork

Submission to the Draft Cork City Development Plan
on behalf of Brian McCarthy Family and the Creedon Group
Ltd.

October 2021



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Document Control Sheet

Client	Brian McCarthy Family and the Creedon Group Ltd.	
Project Title	Submission to the Draft Cork City Development Plan	
Document Title	Lands at Lee Road, Cork	
Document Comprises	Volumes	1
	Pages (Including Cover)	10
	Appendices	2
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Checked by	[Manager]	
Office of Issue	Cork	
Document Information	Revision	A
	Status	Final
	Issue Date	October 2021

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1. Introduction

This submission is made on behalf of Brian McCarthy Family and the Creedon Group Ltd. The property is situated on the Lee Road opposite the UCC Environmental Research Institute as shown on Fig 1. It is bounded to the east by the former Our Lady's and St. Kevin's hospitals which are being redeveloped for residential development. To the west lies the small residential neighbourhood of Hollymount and beyond that is the Lee Medical Clinic. As the site is surrounded on three sides by long established residential and institutional uses it could not accurately be described as being located within a rural area.

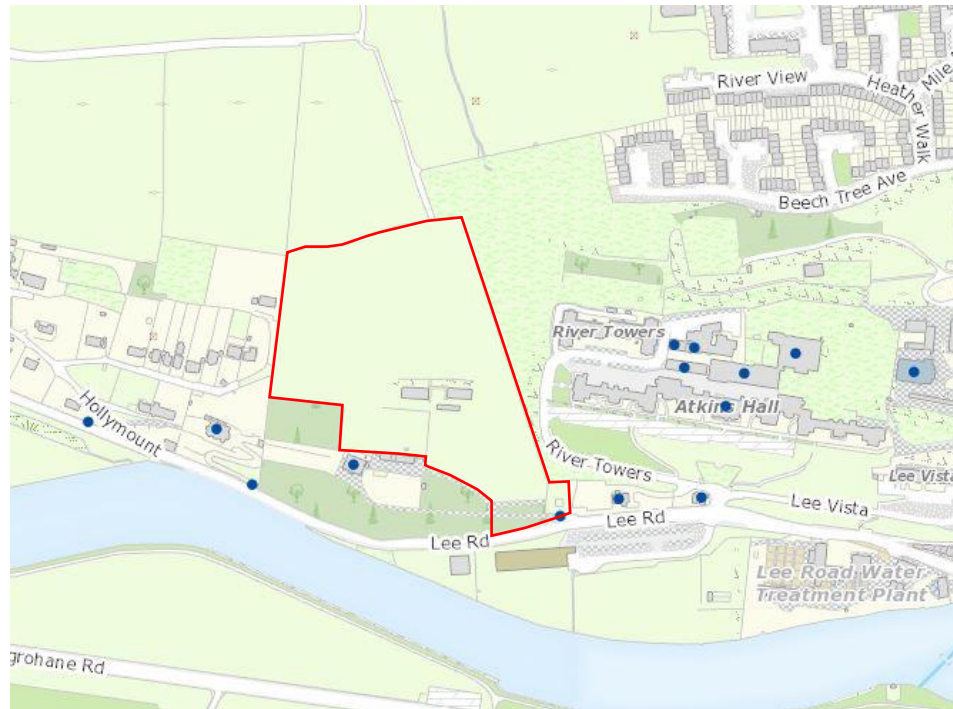


Fig 1 Site Location Map showing the property outlined in red

Prior to May 2019 the eastern boundary of the site formed the administrative boundary between Cork City and County. Pending the adoption of the new Cork City Development Plan for 2022 to 2028, the zoning objectives of the 2014 Cork County Development Plan still apply. These show that the southern part of the property is within the development boundary of the City Environs and the northern part is within the Metropolitan Green Belt.

The recent extension of the jurisdiction of the City Council has provided the opportunity to review the current boundary between the Metropolitan Green Belt and the development zones within the City environs. In some cases, the inner edge of the Green Belt is defined by the administrative boundary and does not have any clear planning rationale. The Draft City Development Plan proposes to redesignate the areas of the Metropolitan Green Belt which fall within the new City Boundary as the "City Hinterland" where planning restrictions similar to the Green Belt will continue to apply. However, there are also cases where the Draft City Plan has proposed to amend the boundary between the former Green Belt and the adjoining development zones.

The purpose of this submission is to seek a similar review and amendment of the development zones at the Lee Road where the eastern boundary of the new City Hinterland zone is still defined by the old City/County boundary. In our opinion the rezoning proposed in this submission would be consistent with the National Planning Framework and with the criteria which have already been used by the City Council to justify the proposal to rezone part of the former Green Belt for residential development at Castletreasure.

2. The Castletreasure Precedent

The rationale for a review of the development boundary at Castletreasure was originally set out in a proposed amendment to the Ballincollig Carrigaline Municipal District Local Area Plan (LAP) 2017 which was published by Cork City Council on 21st December 2020. The proposed amendment to the LAP has now been incorporated into the review of the City Plan. The rationale for the proposed amendment to the development boundary at Castletreasure is to facilitate residential development in an area of high housing demand.

The planning report for the Castletreasure amendment justified the rezoning on the following grounds:

- Although the site is currently in agricultural use and zoned Green Belt it may be deemed to be located within the existing built up area of Cork City and suburbs which is defined by the National Planning Framework (NPF) to include sites “within and close to the existing ‘footprint’ of built-up areas”
- The redevelopment of this agricultural holding would help to achieve the ambitious target for Cork in the National Planning Framework that at least 50% of all new housing will be delivered within “existing built-up areas”, as defined by the NPF
- The site would be developed in accordance with a masterplan which includes proposals to facilitate increased connectivity with the adjoining quadrant of the City.
- The connectivity would be improved at two levels:
 - At the strategic level by the fact that the site is on the route of the proposed Ballybrack Cycleway which is an important component of the Cork Cycle network plan.
 - At the local level by the fact that the masterplan for the site would provide for additional pedestrian and cycling connectivity with adjoining development sites and with social, retail and recreational facilities in the area.
- The selection of the land to be rezoned was based on a sequential approach whereby preference was given in the first instance to land in the immediate environs of Cork City which are surrounded on three sides by development zones.
- Ideally sites proposed for rezoning should already be serviced or any infrastructural investment required should be funded by

the developer. If public infrastructural investment is required, it should offer opportunities to leverage maximum returns and should not have consequences for future strategic works in the Cork Area.

- There should be a strong demand for residential development at the proposed location.

The following sections will demonstrate that the criteria which have been used to justify the extension of the development boundary at Castletreasure also apply to the site at Lee Road which is the subject of this submission.

3. The Potential Impact on the City Hinterland:

Any proposal to rezone part of the City Hinterland for residential development should consider the concerns that may be raised about the erosion of the rural character of the City Hinterland. The impact will depend on the extent to which the site currently contributes to the character of the City Hinterland.

The primary purpose of the City Hinterland as set out in Draft Zoning Objective 21 is:

To protect and improve rural amenity and provide for the development of agriculture.

The written statement of the Draft City Plan explains (in paragraphs ZO 21.1 and ZO 21.2) that

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. 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

The proposed rezoning for residential use would not result in the loss of any of these hinterland uses as they are not currently established on the site. In fact, the rezoning to residential use could provide an ideal transitional use between the built up area and the hinterland by providing market garden allotments as part of a residential “village” and by enhancing the biodiversity of the areas allocated to landscape protection

Objective 10.92 and Paragraph ZO 21.3 also clarify that the City Hinterland helps to maintain a clear distinction between urban areas and the countryside and avoid the harmful impacts of urban sprawl. As the site is hemmed in on three sides by existing residential and institutional uses, its redevelopment would merely remove a small bulge in the development boundary and would have the effect of enhancing the distinction between the urban areas and the countryside.

Another purpose of the City Hinterland as set out in the Draft City Plan is the protection of natural landscape. Objective 10.93 acknowledges that this can be achieved as part of the development process by:

- (a) ensuring that landscape is an important consideration in any development proposals,
- (b) requiring that new development meets high standards of siting and design; and
- (c) avoiding removal of extensive amounts of trees, hedgerows, historic walls or other distinctive boundary treatments.

These issues are addressed in the masterplan prepared by Reddy Architecture + Urbanism which is attached as Appendix 1.

In summary:

While the subject site is currently zoned Green Belt and proposed to be zoned as City Hinterland in the new City Plan, it does not currently function as part of the Green Belt.

The site is effectively a small pocket at the edge of the existing built up area. The proposed infill development would straighten the hinterland boundary and make a clearer distinction between the urban areas and the countryside.

The masterplan demonstrates that the main landscape features on the site can be incorporated into the layout and design of any permitted development, in accordance with Objective 10.93. It also demonstrates that provision can be made for allotments and areas of enhanced biodiversity which would provide an appropriate transitional land use between the City and its hinterland.

4. The St. Kevin's Precedent

Apart from the issues of principle raised by the amendment of the City development boundary the Council will also need to be satisfied that development on the site would comply with the normal planning considerations for this area.

The most relevant precedent is the recent decision of An Bord Pleanála under Case No. ABP-308923-20 to grant permission to the Land Development Agency for a strategic housing development on the grounds of the former St. Kevin's Hospital. The key issues were local housing need; sustainable transport local connectivity and visual impact.

The Board acknowledged that there is a significant unmet housing need in the area and that there was no risk of the Core Strategy targets being exceeded. It also noted that planning policy at national, regional and local level seeks to prioritise the provision of new homes at locations that can support sustainable development.

The St. Kevin's site was deemed to be located within a 'Public Transport Corridor' even though the area is not currently served by high frequency bus services. The Inspector was satisfied that the 220 Route at Western Road would be less than a

ten-minute walk and that BusConnects routes were proposed by CMATS in the vicinity of the site. The Inspector therefore concluded that the development site would have reasonable access to amenities via public transport, and that these services will improve in future.

The Inspector also noted that the potential to provide for substantial additional densities in the area is limited by the site constraints, including architectural heritage, steep topography and protected views. It could therefore be argued that an extension of the development boundary is warranted to ensure that the increased population needed to support the public transport investment is achieved.

St. Kevin's is situated in a visually-prominent location, and comprises lands designated in the Development Plan as being either within a landscape preservation zone or an area of high landscape value. The Inspector therefore assessed the visual impact from a variety of locations in the surrounding area including the linear views designated in the current City Plan.

The Inspector concluded that there would be no discernible impacts on the landscape, as the sloping topography and existing features within the built and natural urban environment restrict views of the site and the wooded area along the northern boundary largely restricts views from that direction. Where visible from more distant locations over 1km from the site, the new buildings and landscaping would sit into the backdrop of rising ground and buildings situated within the Shanakiel ridge, including an array of existing buildings. From such locations the development would only have an imperceptible to slight visual impact on the character of the landscape.

In our opinion, this assessment would also apply to the subject site which could be considered to be located in a more secluded position on the ridge.

5. Integration with the Current Planning Objectives for the Area

As previously noted an important consideration in the decision to amend the development boundary at Castletreasure was the fact that a masterplan was prepared to integrate the site layout development with the pattern of development on the adjoining development zones. We attach as Appendix 1 to this submission a Village Concept Masterplan prepared by Reddy Architecture + Urbanism.

This demonstrates how revised zoning objectives for a mix of residential and landscape protection uses would facilitate a village of up to 137 dwelling units while protecting the principal landscape features on the site.

The area allocated to landscape protection will preserve and enhance the landscape and building conservation features on the site. The proposed landscape zone is defined to the north by the belt of mature trees which provides the backdrop to Clanloughlin House and to the south by the tree belt along the Lee Road to the west of the entrance. The positioning of the landscape protection area is also very effective from a building conservation viewpoint as it would

preserve the key features of the setting of Clanloughlin House as identified in the NIAH (20865004), i.e.:

- (a) *(the setting) in landscaped grounds on an elevated site with rusticated piers to perimeter having cornices below capping supporting spear head-detailed wrought iron double gates.*
- (b) *the deliberate alignment maximising on panoramic vistas overlooking the meandering River Lee.*

The Masterplan also shows how the alignment of the residential and landscape protection areas on the site areas would replicate with the established pattern of development on the adjoining lands to the east and provide pedestrian and cycle connectivity.

6. Integration with the Public Transport Strategy for the Area

The decision to rezone part of the Green Belt at Castletreasure was also influenced by the fact that redevelopment of the site could facilitate the delivery of an important section of the proposed City Cycle Network. We attach as Appendix 2 to this submission a Traffic and Transportation Report prepared by MHL Consulting Engineers.

The report confirms that the site is very well connected to the city centre. The excellent cycle facilities on the carriageway along Wilton Road, Western Road and Carrigrohane Road also connect to Ballincollig and Bishopstown (including UCC, MTU, CUH).

The public footpath along the frontage of the site has recently been repaired and improved. This facility extends to the west along Lee road to the Bon Secours Care facility and connects to the city footpath network at Wellington Bridge to the east.

Bus connectivity is provided by the 201 Orbital Route which stops close to the Wellington Bridge junction while a number of high frequency City services (201, 208 and 220) are available on Western Road, within a 10- or 15-minute walking distance of the site.

The Masterplan takes full account of the Traffic and Transportation Report and includes provision for the long-term objective in the CMATS for a new distributor road and primary cycle route crossing the site from north to south. While the CMATS indicated that the route might run along the eastern boundary, the Masterplan indicates that the western boundary would provide a better alignment. As the site could accommodate either route, the precise alignment should be determined at the planning application stage.

7. Summary and Conclusion

Although the site is currently zoned as Green Belt it is effectively an infill site within the built-up area of the City environs as defined in the NPF.

Redevelopment for housing could therefore make a valuable contribution to the achievement of the strategic objective of directing 50% of population growth into infill or brownfield sites within the built-up area of the City.

The City Council's decision to rezone part of the Green Belt at Castletreasure for housing establishes a relevant precedent from a zoning viewpoint. In our opinion the rezoning proposed in this submission satisfies all of the criteria applied in the Castletreasure case.

The recent decision of An Bord Pleanála under Case No. ABP-308923-20 to grant permission for a strategic housing development on the former St. Kevin's Hospital is a relevant precedent from development management viewpoint as it established that the area is well connected from a public transport viewpoint and there would be no significant impact on the visual amenities of the area.

The capacity of the site to accommodate a sustainable development of 137 units has been demonstrated by the Village Concept masterplan prepared by Reddy Architecture and Urbanism and by the Public Transport Strategy prepared by MHL.

We therefore request that the site be rezoned in accordance with the the proposed re-zoning map in Fig 2 below:.

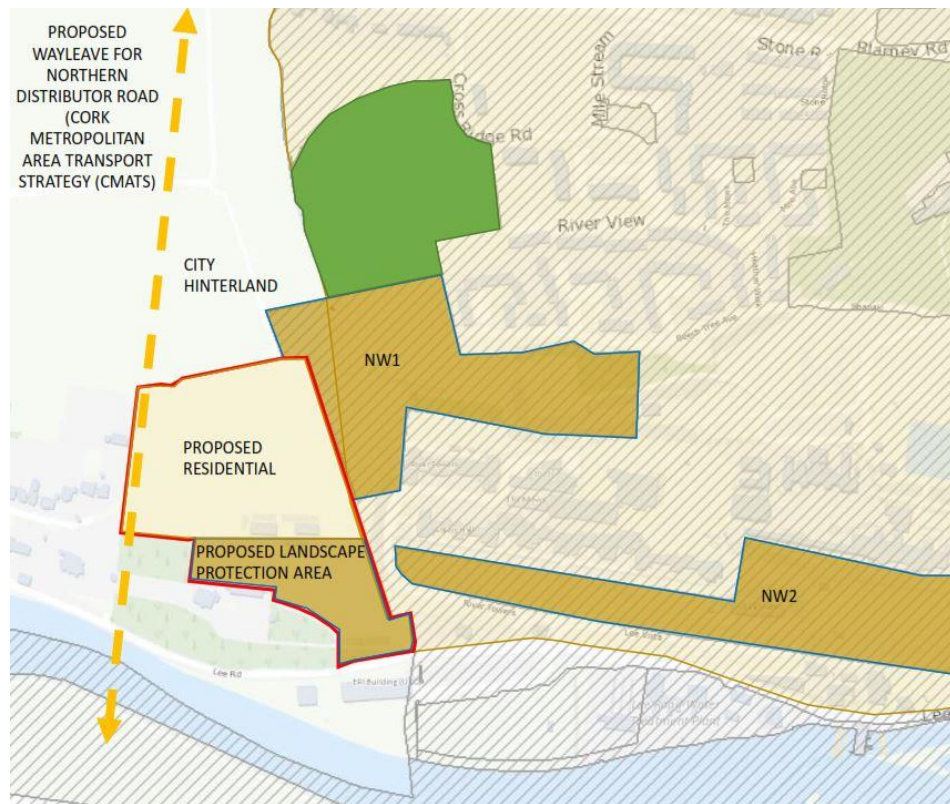


Fig 2 Proposed rezoning map