

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

26 April 2022

RE: Submission on Amendments to the Cork City Development Plan 2022 'Lands at Lee Road' (2.97 and 2.98)

Dear Sir/Madam,

I wish to register my objection to amendments 2.97 and 2.98. I do not consider the proposed amendments to be appropriate for the following reasons:

Zoning Requirements for Tier 1 and Tier 2 Lands (Appendix 3 NPF)

- The lands proposed under 2.97 are an important part of the greenbelt of Cork City. Their zoning as hinterland should be retained to ensure that the long established urban containment role of a greenbelt remains;
- If adopted the zoning will undermine the greenbelt (hinterland) of the City and undermine the overall settlement strategy and core strategy of the Plan. This zoning will result in urban sprawl.
- These lands are not serviced (Tier 1 lands) and will not be serviced in the lifetime of the Plan (Tier 2 lands). Their zoning would therefore be contrary to NPO 72a in the National Planning Framework;
- The area has significant infrastructural deficits and zoning these lands will allow for development which will exacerbate these issues. There is insufficient water and waste water supply, with no planned upgrades;
- The examples given in the submission CRK-C155-DEV21-134 on the Draft Plan are not relevant or applicable here. These are greenfield lands (2.97 and 2.98) in a rural hinterland. St Kevins, an example given, is a long established Institutional brownfield site to the west of the City. It has had long established connections to services and amenities.
- The rezoning is contrary to the National Planning Framework commitment to Compact Growth and NPO 53 which aims to reduce land use change from urban sprawl;

Protection of the Environment, Ecology and Biodiversity

- The zoning will allow for residential development and associated infrastructure to be undertaken on the lands identified as 2.97 and 2.98. This will undermine and fragment the habitat of important species of heron, bats and owls;
- There is a heronry at this site associated with the Cork Harbour SPA. This requires additional assessment in the SEA Report;
- The development on lands proposed to be zoned 'landscape preservation zone' (2.98), will allow for access to lands identified as 2.97 and ancillary services to be developed. This will undermine the

biodiversity of the site, and will result in the destruction of trees which are in excess of 60 years old. This is deemed in ecological terms to be a 'significant impact';

- If the lands 2.97 were retained as 'hinterland' access roadways and infrastructure associated with the proposed new neighbourhood zoning would likely not be permitted, as to do so would be contrary to the Plan. It is our interpretation that 'landscape preservation zone' is proposed here not to preserve this landscape but in fact to facilitate development. It has long been established that roadways to residential developments through what was formally identified as 'prominent and strategic greenbelt' was deemed contrary to the development plan;
- From my reading of the Draft this site remains located in the 'prominent and strategic hinterland' identified in Figure 6.5 of the Draft, and yet these amendments are being proposed.

Transportation and Active Travel

- Zoning this site would be contrary to the Council's commitment to encourage active travel. There is no bus service in the area. Cycling is unsafe on the Lee Road and the footpaths are deficient in their design.
- To zone these lands will result in development which will cause a traffic and pedestrian hazard for this community;

Landscape and Visual Impact

- Sites 2.97 and 2.98 are the gateway to the Lee Valley. To zone these lands would impact protected view and the view of St Kevin's and Our Lady's Hospital (as identified on Map 5 View Management Framework of the Draft City Development Plan)
- The Lee Valley is not just aesthetically beautiful it is of cultural and social importance to the foundation of our City. This zoning will fragment the Valley and impact its landscape value significantly. Regard has not been had to the European Landscape Convention in preparing these zoning amendments;
- The Cork City Landscape Study 2008 identified the visual beauty of *"the experience of entering the city from the west is dominated by the high visual amenity of the Lee Fields and Lee Valley, views of County Hall and the dramatic landscape to the north of the city."* Now that Cork City Council have inherited these additional lands into their administrative area they should seek to protect this landscape and views. To adopt amendments 2.97 and 2.98 would be contrary to this protection.

I would ask that the Members strongly consider the above points when deciding whether or not to zone these lands. To accept these amendments will result in irreversible fragmentation of the greenbelt (hinterland) and protected species habitats. It will lead to urban sprawl and exacerbate infrastructural deficiencies which will affect generations of this City to come.

Yours Sincerely,



Oliver Browne, Lee Road