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04 October 2021

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**Re: Submission to Draft Cork City Development Plan 2022 – 2028
Extension of ZO 01 Sustainable Residential Neighbourhood Zoning at Rochestown Road
Cork.**

Dear Sir/ Madam

This submission has been prepared on behalf of Liam Davis in response to Cork City Council's invitation for submissions to the Draft Cork City Development Plan 2022 -2028 (Draft DP). This submission is specifically in response to the Council's draft zoning objectives for the South-east City Suburban area of Rochestown which will form part of the Cork City Development Plan 2022-2028.



Figure 1.1 Site Context Map

Mr. Davis welcomes the review of the Cork City Development Plan 2021 and considers it an opportune time to re-evaluate the development boundary to the south-east of the city to address the

inconsistencies in relation to his lands and adjacent lands to the north. These lands which were previously within the Cork County Council area are now located within the extended Cork City boundary c.600m east of Rochestown along the Rochestown Road (R610) and as a consequence of their location adjacent to the Passage West Greenway present an opportunity for sustainable development to support the ambitious national and regional policies for the delivery of population and housing in Cork City by 2031.

Our client has reviewed the proposed land use zoning in the Draft DP and notes that the zoning anomaly in relation to the lands immediately to the north of the subject site, which were previously zoned neither within the Existing Built-up Area or the Prominent and Strategic Metropolitan Greenbelt has now been addressed. He considers this zoning of his lands, which form a natural extension of the latter should also be revisited.

SUBMISSION REQUEST

- That the Council extend the zoning ZO 01 Sustainable Residential Neighbourhood zoning to include the subject lands.

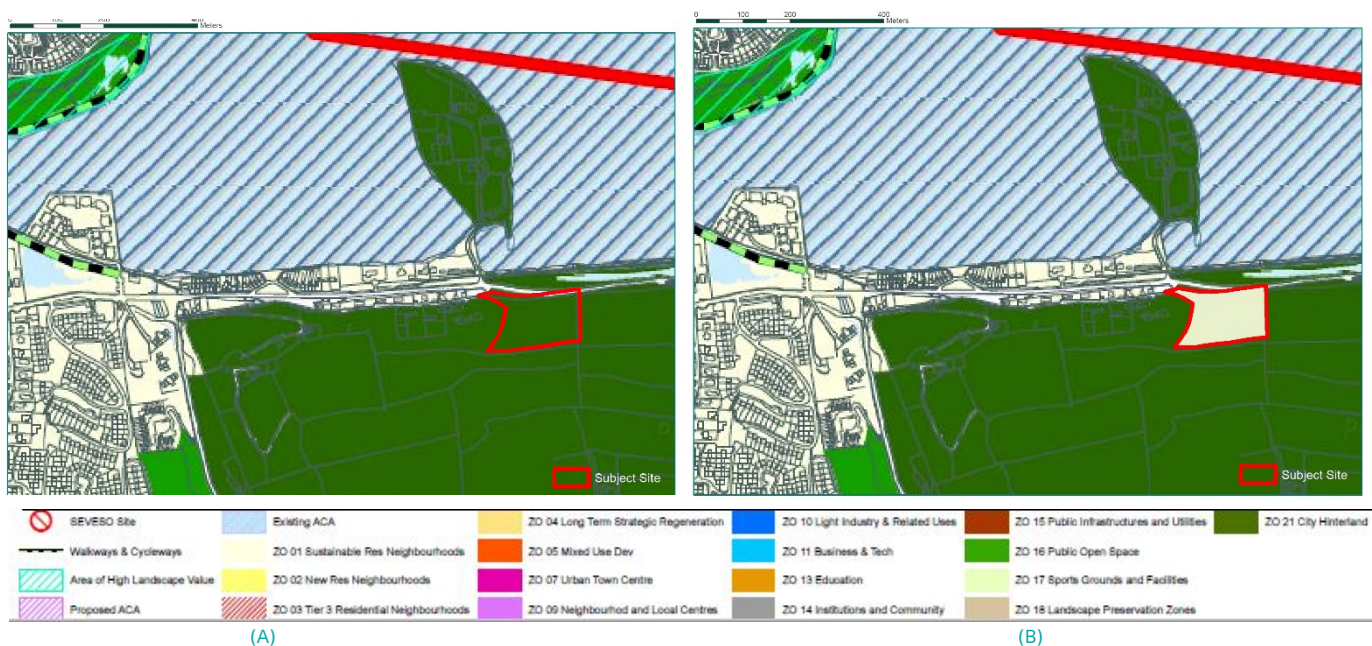


Figure 1.2 Draft DP Zoning (A) and Proposed Zoning (B) at Rochestown

POLICY CONTEXT

National and Regional Policy:

The planning policy context in Cork has been rapidly evolving in recent years with the publication of the National Planning Framework (NPF) in 2018 and more recently the release of The Regional Spatial and Economic Strategy (RSES) for the Southern Region, the Cork Metropolitan Area Strategic Plan (MASP) and the Cork Metropolitan Area Transport Strategy (CMATS).

The NPF includes a list of ‘shared goals’ across the country framed as 10 National Strategic Outcomes, which include, inter alia, the development of compact growth and sustainable mobility. It sets the scene for a rapid expansion of the City’s population over the coming two decades including:

Progressing the sustainable development of new greenfield areas for housing, especially those on public transport.

In addition, the RSES has further expanded on the growth objectives for Cork City. A common theme has emerged among all policies namely:

- The need to ensure that there is a strong coordination between land use and transport planning.

Draft Cork City Development Plan 2021

These growth ambitions and emphasis on compact growth are carried through into policies in the Draft DP. In relation to the Rochestown Road the Draft DP extends the ZO 01 *Sustainable Residential Neighbourhoods* to include the existing built up-areas immediately to the north-west of the subject site with the following objective:

To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.

Rochestown is considered part of the Douglas area in the Draft DP, an areas described as an integral and vibrant part of Cork City. The plan notes the availability of good infrastructure and services rendering the area attractive for development. It acknowledges the wider transport proposals, which will contribute towards delivering a better and health place to live, work and visit. Traffic congestion is considered one of the greatest challenges to the area. Crucial walking, cycling and public transport improvement are proposed in CMATS for the area. In addition to the greenway, the Draft DP notes that CMATS makes provision for a radial bus service in outer areas of the City such as Rochestown.

The zoning objective for the subject site is ZO 21 City Hinterland:

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

Ballincollig Carrigaline Municipal District Local Area Plan 2017 (LAP)

The subject site fell within the *Prominent and Strategic Metropolitan Greenbelt Area* in the LAP. Immediately to the north of the site, across the Rochestown Road, was a zoning lacuna, that included Hop Island, where the lands were neither within the Cork City South Environs *Existing Built-up Area*¹ nor the *Prominent and Strategic Metropolitan Greenbelt*.

¹ Ballincollig Carrigaline MD Local Area Plan 2017

BALANCED GROWTH

The South-east City Suburb and the Rochestown area in particular is strategically located adjacent to the Passage West Greenway, a walkway / cycleway along the old railway line, providing connectivity to a wide range of services and urban amenities at Rochestown, Mahon, Passage West and the City Centre. It is also set to benefit from planned enhancements to the public transport provision in the form of a BusConnects higher frequency radial bus route between Ringaskiddy, Carrigaline and the City Centre. However, as Table 01 indicates the population growth in the City Suburb was the lowest of any of the city areas between 2011 and 2016.

Cork City	2011	2016	% pop change
NW Quadrant	22,608	23,336	3.22%
NE Quadrant	24,984	25,996	4.05%
SW Quadrant	36,927	40,442	9.52%
SE Quadrant	51,007	51,605	1.17%
City Centre	21,547	24,188	12.26%

Table 01 Growth Rates 2011 – 2016 by City Area

Objective 33 of the NPF emphasises the importance of providing homes in locations that can support sustainable development. Existing and proposed good public transport provision in conjunction with the excellent pedestrian and cycle connectivity of the subject lands make this a sustainable location for development. This connectivity underpins the sustainability of the subject site.

ZONING HISTORY

We note that Cork County Council was previously minded to zone this area for residential development under the 2011 Carrigaline Electoral Area Local Area Plan (LAP):

2.3.6. Consideration will be given to the potential development of some limited housing (retirement village) on the area commonly known as Hop Island. Any development at Hop Island should be low density and will be subject to proper planning and sustainable development considerations and have regard to the adjacent Special Protection Area and

to the high tide roost on Hop Island. Proposals in this area may require the production of a Natura Impact Statement.

Our client's discussions at the time with Cork County Council indicated that the Council viewed his lands as part of the Hop Island area, and they would be given similar consideration to that which applied to Hop Island in the Carrigaline LAP. However, this policy while included in the text of the plan was not incorporated into the zoning map of the LAP.

Notwithstanding this, the rationale for promoting growth in this location was sound, based on key planning assessment criteria. Despite positive indications Cork County Council did not resolve this issue in previous plans for the area. As highlighted below given the urban nature and scale of development at this location the ZO 01 Sustainable Residential Neighbourhood should include Hop Island and be extended across the road to include the subject site as previously suggested by Cork County Council. Recent national and regional policy changes and increased housing targets for Cork City, further support development at this location.

URBAN NATURE

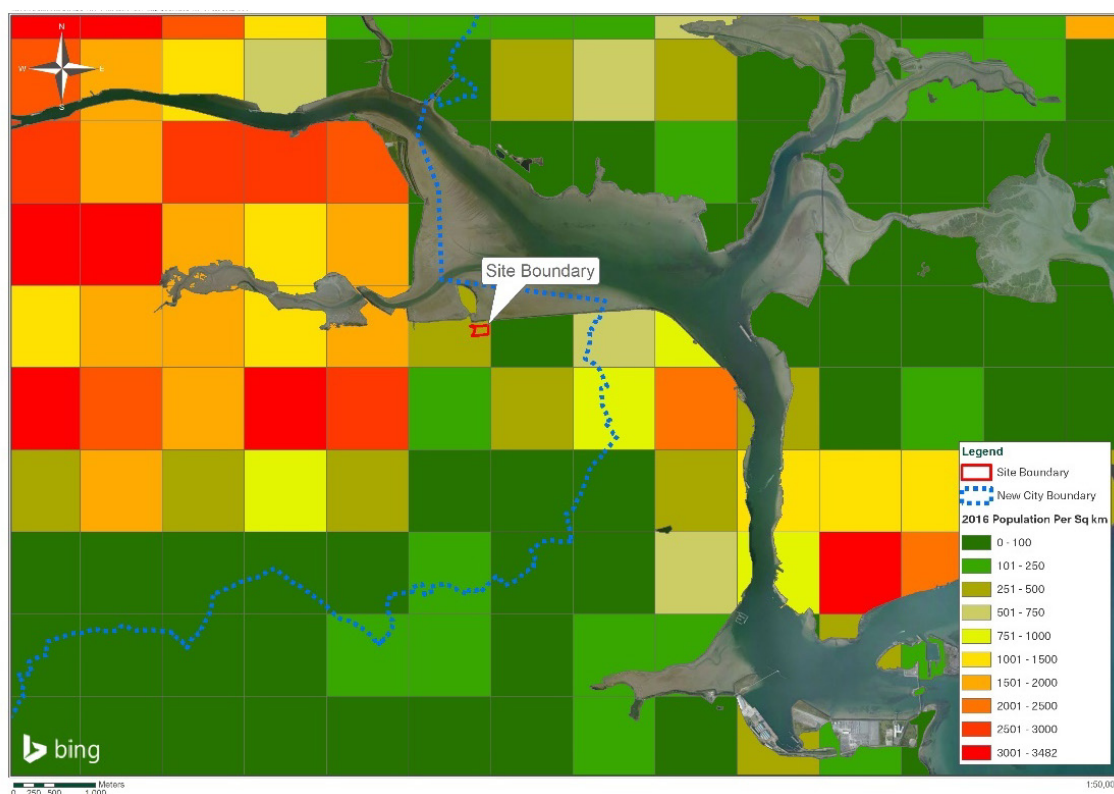


Figure 1.3 2016 Population Density 1km Grid based on CSO Census Data

Figure 1.3 illustrates that there is already an elevated population density in this area. This is also evident in Figure 1.1 where the existing pattern of development extends to the western boundary of Mr. Davis' site with the ZO 01 in the Draft DP extended to reflect this. We consider that it would be appropriate to further extend this zoning to include the subject lands, which also benefit from the walking, cycling and public transport connectivity of this location. This would support the development of compact form, creating homes within 5- 10 minutes' walk of services and social



infrastructure. The adjacent greenway and nearby urban facilities would result in a modal shift for future residents and a reduction in car-based trips adjacent to services, schools and other critical social infrastructure.

We request that the Council extend the ZO 01 zoning to include the subject lands when finalising the zoning provision for the area. We consider that this will contribute towards the future sustainable growth of the Rochestown area.

Please do not hesitate to contact us if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Harry Walsh', with a stylized flourish at the end.

Harry Walsh
HW Planning