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14th January, 2017.

RE: Consultation on draft Ballincollig-Carrigaline Municipal District Local Area Plan

Dear Sir,

I welcome the opportunity to participate in the consultation on the first draft of the Ballincollig-Carrigaline Municipal District Local Area Plan. I should be grateful if you would consider my observations as outlined on Ringaskiddy. Ringaskiddy is discussed in Section 3.7 of the draft Plan.

Whilst it is clear that development of the Strategic Industrial Zone at Ringaskiddy is a priority for Cork County Council, the Industrial Development Authority and the Irish government over many years, this cannot be at the expense of the Shanbally/Ringaskiddy residents, the protected birdlife of Cork Harbour or the nationally important landscape of Cork Harbour. We know the quality of life for residents of Shanbally/Ringaskiddy has decreased. We have evidence that the protected birdlife of Cork Harbour is suffering. We see that the landscape of Cork Harbour is has been detrimentally affected by industrial development. Yet despite all this increasing knowledge, I do not see proposals in the draft Local Area Plan to address this.

So many aspects of Ringaskiddy's Strategic Industrial Zone epitomise what is now regarded as unsustainable development. This review of the Local Area Plan presents an excellent opportunity to challenge and address those failings and I ask that the County Council would grasp that opportunity with imagination and enthusiasm.

- **Traffic into and out of Ringaskiddy**

The Ringaskiddy Strategic Industrial Zone is located at the end of a peninsula onto which there is simply one road. That there is no alternative to the private car for all those employed there has led to the horrendous peak hour traffic congestion that has come to characterise

the N28. The upgrade of the N28 will be welcome in this regard when it comes, but realistically, it only touches addressing the unsustainability of traffic and transport arrangements to this Strategic Industrial Zone. I have already spoken above about the need for a Greenway from Carrigaline to Ringaskiddy. This must link with the Greenway which we anticipate will come as far as the Raffeen junction with the existing N28. An enhanced bus service to Ringaskiddy is essential. Although these aims were mentioned in the 2006 Local Area Plan, there has been no progress since.

Would the N28 upgrade be necessary at all if Cork County Council were to, in conjunction with the industries, provide a large car park at the Shannonpark roundabout with small shuttle buses running up and down between Shannonpark and the industries on a continual basis? If factory employees were obliged to use the shuttle bus system, the road capacity that would free up would accommodate the Port of Cork's freight traffic with little difficulty. The only road upgrade then required east of the Shannonpark roundabout would be the provision of a bypass for Shanbally.

- **Conservation of Ballyhemiken Quarry**

It is proposed to run the M28 through Ballyhemiken Quarry. Despite being a manmade habitat, Ballyhemiken Quarry and its associated freshwater lake supports an ecologically significant number of species of conservation concern. In July 2016, 79 species of plant, including several listed in the Red Data Book, were recorded during a field visit. The lake is calcareous and supports a species assignable to Annex I of the EU Habitats Directive. A wide expanse of reed beds around the lake exhibit one of the largest collections of dragonflies and damselflies in the country.

I ask that preservation of Ballyhemiken Quarry and lake as a Nature Conservation Area would be included as a priority in the Local Area Plan.

- **Impact of the proposed M28 route**

The impact of the M28 will be multifold. It will cut through fields and farmland, industrial land and public open space. It will rise above the countryside, altering forever the rural landscape, particularly around Coolmore and Shanbally. Paragraph 3.7.37 notes that the M28 will cause "severance of strategic land banks" and makes a commitment from the County Council to optimise land zoned for industry.

Where is the similar commitment to affected residents and landscape?

Despite commitments to industry, it is a sad irony that the current M28 route proposal would cut through the only zoned green space in Ringaskiddy. The purpose of this zoning is to provide a buffer between Ringaskiddy town centre and industry and to protect the landscape of Ringaskiddy. If a motorway is to be run through it, how will the Local Area Plan commit to optimising green and buffering space for Ringaskiddy town centre as it has committed to for industry?

- **Protection of residential amenity**

It is omissions like this above which make commitments such as that in Paragraph 3.7.17 to protecting residential amenity ring hollow. The same paragraphs with the same intentions to protect the same residents have appeared in the previous Local Area Plan. In the past year

alone, residents of what was once the fishing village of Ringaskiddy have been cut off entirely from the water by a noise barrier installed by the Port of Cork. The reality is that natives of Ringaskiddy now only in their forties grew up alongside a narrow road with their clinker-built dinghies bobbing in the water on the other side of the stone sea wall. Now those same residents can no longer even see the sea. That is a cultural shift that has never as much as been recognised let alone addressed by any planning application.

To date, objectives RY-GO-03 pertaining to the Port of Cork and RY-GO-06 pertaining to residential amenity have been utterly incompatible. There is a particular need to monitor and control noise, dust and air quality in Ringaskiddy. Where possible, permanent environmental monitors are required and I ask that the Local Area Plan would commit to this. There is also a need to control night-time port-related traffic movement. The quality of life enjoyed by some residents in Ringaskiddy has been very badly impacted by their proximity to the port. There is a concern that this impact may be magnified by the new and expanded facilities for which the Port of Cork has been given planning permission. It is critical that the Local Area Plan would state its awareness of this issue and its commitment to work with the Port and the residents on ensuring port impact is reduced rather than amplified.

Provision of quality informal recreational spaces would go such a long way towards improving the facilities for Ringaskiddy residents. Local access to water must be provided. It is unjust to be living in a seaside town but to be neither able to see nor to access the water. Since the last Local Area Plan, the people of Ringaskiddy have lost their most used amenity grounds: the shoreside walks on Port of Cork reclaimed ground. The Local Area Plan does not identify this nor any proposed replacement. Neither the proposed amenity area at Paddy's Point nor the rehabilitated Haulbowline Island East Tip will suffice as compensation. Both are too far away. In particular, the East Tip would be an amenity to which even local people would likely take a car.

In the preliminary consultation, I asked that the Local Area Plan zoning maps would identify this promised amenity area at Paddy's Point. It is still not identified in the current draft Plan.

Cork County Council and the IDA have an aim of attracting high quality industry to Ringaskiddy. But high quality industry demands a high quality environment for its employees. Ringaskiddy does not represent that high quality environment and yet has immense potential to do so. Industry and warehousing is given land right out to the edge of the water, whilst factory employees and students are relegated to exercising on the footpath between the industries and the N28. It is so important that a strip of land along the water's edge is kept such that it can be developed as public amenity. That such an amenity can be offered to its employees will make Ringaskiddy more attractive, not less attractive, to high quality industry. This needs to be a policy of the Local Area Plan.

Ringaskiddy village welcomes thousands of visitors off the ferry every year. It is the gateway to Ireland. Yet its appearance is grey and derelict. Its landscaping is uncoordinated. It could offer so much more: a place to stop, to freshen up after a long ferry crossing, to relax and unwind before enjoying the Irish experience. The Local Area Plan needs to commit to ways by which this vision can be achieved. It is otherwise a tragically lost opportunity.

So whilst the commitments outlined in Objective RY-GO-06 and in Paragraphs 3.7.5 and 3.7.17 to protecting residential amenity are welcome, as word-for-word repeats of fruitless commitments in the 2006 Local Area Plan, they ring hollow. Specific actions towards achieving that protection are essential.

- **Enhancement of the Ringaskiddy university/research hub**

The recent trend towards development of a university/research hub at the eastern end of the Ringaskiddy peninsula is hugely positive and very welcome. This trend should be reinforced by the Local Area Plan. To do so is clearly in line with the long-held CASP aim for Ringaskiddy: “The Cork Harbour Area would offer a superb environment for a Cork Technopole”. To that end, I ask that the Local Area Plan would have as a specific aim that further development at the eastern end of the Ringaskiddy peninsula would compliment and build on this trending university campus.

Although Paragraph 3.7.14 directs visitor and student accommodation towards Ringaskiddy town centre, the reality is that rental opportunities in Ringaskiddy are like gold-dust. It is very difficult to get affordable accommodation close to the NMCI. Students and others are forced to take accommodation in Carrigaline. Because there is no bus service between Carrigaline and Ringaskiddy, many are forced into purchasing a car for daily commuting, thereby adding to the traffic congestion. Providing for adequate residential accommodation in Ringaskiddy would create a much more sustainable Strategic Employment Area. A university is nothing without staff and students so, by not planning for essential residential accommodation, despite Paragraph 3.7.31, the Council is actually not supporting these facilities at all.

- **Protection of the Cork Harbour landscape**

The Cork Harbour landscape is noted in the draft Local Area Plan as being of high value, high sensitivity and an area of national importance. Yet the description of that landscape provided in the draft Plan (paragraphs 3.7.50 and 3.7.51) mentions the components of that landscape as including major industrial development, water storage towers and telecommunication masts, roads, bridges, electricity power lines and urban sprawl. It also mentions the fertile farmland of the harbour islands and much of the harbour shore and the old military fortifications on the two hilltops at the harbour mouth.

There is no assessment at all of what makes that landscape of national importance. Is it regarded thus because of its industrial and infrastructural components? If so, build on. But if not, the Local Area Plan needs to set out how that landscape will be protected. At present, it does not.

When industry is given planning permission, visual screening from the water must be regarded with the same importance as zoning from the land. Cork Harbour is finally developing as a unique tourism offering and, whilst it is quite possible to accommodate tourism and industry side by side in our multi-faceted harbour, it is essential that the visual impact of the industrial zone would be softened whenever possible.

There is no assessment at all of whether development on the lands zoned for development would affect what is regarded as a landscape of high sensitivity. Would industrial development down to the shores of the harbour be appropriate in the context of maintaining a landscape of national importance? Again, the Local Area Plan cannot just decide that lands right round the shores of our Municipal District are appropriate for development without having regard to the sensitivity of the landscape of those lands and their contribution to the overall nationally important designation of the harbour landscape.

As a suggestion, the planners need to sit in a boat in the middle of the harbour and mark off envelopes of land which need to remain undeveloped to maintain this sensitive, nationally important landscape. They need to plan for the sort of visual mitigation that would work for all industrially zoned sites. That visual mitigation needs to be applied both between the road

and the site of development and between the water and the site of development. They need to include an aim to leave adequate room between the development and the water to carry out that visual mitigation effectively. As an example, there is good mitigation of visual impact between what was ADM and Monkstown Creek. But there is no mitigation of visual impact at all between Hovione and Loughbeg. And whatever recommendations apply to each industrially zoned site need to be included within the Specific Development Objectives for that site.

- **Providing for waterside access**

CASP is clear that “*greater emphasis should be given to promoting and developing the harbour as a facility for water-based sport and leisure activity*”. Some of the most valuable access points for dinghy sailing and windsurfing are on the eastern end of the Ringaskiddy peninsula. Gobby Beach is an undeveloped gem. Lands to the east of the Haulbowline Island bridge are equally valuable. Access to the water for development of watersports centres is increasingly difficult to find. Most harbourside land is in private ownership. But a watersports centre on the eastern shores of the Ringaskiddy peninsula offers shelter for inexperienced participants whilst permitting those who are more adept almost immediate access to the wider expanse of Cork Harbour without crossing shipping lanes. I ask that the Local Area Plan would, at a minimum, mention this potential for the eastern shores of the Ringaskiddy peninsula and would, preferably, identify the most suitable area(s) where such development might be supported.

The same issue of restricted access to waterside sites is a real problem for storage of pleasure craft. At present, there are three boatyards in Crosshaven. Each has an element of covered storage. The largest of these has recently been put up for sale. There is another boatyard in Carrigaline. The tenant operating the boatyard has been given notice to leave by the landlord who intends to develop the site for housing. The only other boatyard on the western side of the harbour is in Raffeen/Monkstown. It is no longer open for business.

Cork County Council is encouraging use of Cork Harbour water for tourism and leisure. This has to be supported by adequate landside facilities, otherwise boating will become reserved only for those who can afford to travel long distance for winter storage. It is imperative that the Local Area Plan would have a commitment to working towards providing sustainable landside pleasure craft storage on the western side of Cork Harbour.

- **Protection of the Cork Harbour Special Protection Area**

Paragraph 3.7.2 of the draft Local Area Plan states that large scale industrial developments in Ringaskiddy must be compatible with relevant environment policies as they apply around Cork Harbour. What policies? The wording of Paragraphs 3.7.53 – 3.7.58 pertaining to Nature Conservation Areas is identical to the wording in the 2006 Local Area Plan. It has no specific objectives. Paragraph 3.7.5 identifies the issues considered by the draft Plan. Protection of birdlife in the adjacent Cork Harbour SPA is not one of those issues.

Loughbeg is part of the Cork Harbour Special Protection Area (SPA). But the birds living in Loughbeg move within a much larger area of the harbour. Some feed in Ringaskiddy, others go further upstream to the Foaty Island area. Most cross the peninsulas in their flight. Many use the peninsulas themselves for feeding. Birds such as oystercatchers and curlews need grassy spaces and the Cork Harbour peninsulas provide these. So all the policies of the Local Area Plan for Ringaskiddy and beyond have potential to impact on the Cork Harbour SPA.

Over and over, applications for industrial development around Cork Harbour repeatedly indicate that they individually will have “no significant impact” on the SPA. Perhaps they are correct. But most recent assessment by the National Parks and Wildlife indicates clearly that the site conservation conditions in Cork Harbour for 18 out of the 22 Special Conservation Interest species is unfavourable. In several cases, it is highly unfavourable. It shows that population trends for 18 of the 22 Special Conservation Interest species are decreasing. Numbers of pintail, for example, have massively decreased in Cork Harbour although on the increase both in Ireland and internationally. The shoveller and cormorant are the same: numbers of both species are increasing internationally but numbers of both species have dropped significantly in Cork Harbour. The National Parks and Wildlife has concluded that in cases such as these where populations are stable or increasing at an all-Ireland level but where significant declines are seen at site level, it would be “reasonable to suggest that site-based management issues may be responsible for the observed declining site population trends”.

This conclusion on the part of the National Parks and Wildlife is directly related to Cork County Council policies as outlined in the Local Area Plan.

Over 96 % of the land designated for industry in the zoning map for Ringaskiddy, including all of the land designated for standalone heavy industry and the port, is identified as either a feeding area for bird species protected as part of the Cork Harbour SPA or adjoins the SPA itself. Yet the Local Area Plan has not one single objective in respect of the SPA.

Cork County Council is obliged under European law to maintain the integrity and bird populations of the Cork Harbour SPA. Until now, it has used few tools other than assessments included with individual planning applications by which to evaluate the impact of development on the SPA. This approach is clearly not working. If the County Council were to leave the peninsulas and bird feeding grounds of Cork Harbour undeveloped, it would at least indicate intent to keeping the integrity of the habitat which makes the harbour so attractive for birds.

At the very least, the declining trend in bird populations of the Cork Harbour SPA should be stated as a concern in the Local Area Plan. A reasonable approach to tackling this would be to dezone peninsulas such as the Ringaskiddy peninsula and to leave a reasonable strip of waterside land undeveloped in all currently undeveloped areas around the harbour to act as a buffer zone. With the exception of the port, industry does not need access to the harbour water.

- **Summary**

To summarise, my specific requests for inclusion in the Local Area Plan for Ringaskiddy are as follows:

Include a commitment to investigating the potential for a shuttle bus service operating from the Shannonpark roundabout to Ringaskiddy.

Include Ballyhemiken Quarry and lake as a Nature Conservation Area.

Zone open ground between Ringaskiddy town and the surrounding industrial area to act as a buffer zone for residential amenity and to provide information recreational spaces.

Commit to installing permanent environmental monitoring equipment in Ringaskiddy.

State awareness of the impact which Port activities have on local residential amenity and a commitment to working with the Port and residents to reduce this impact.

Investigate where local access to water may be provided for Ringaskiddy residents.

Identify the proposed amenity area at Paddy's Point in the zoning map for Ringaskiddy.

Include a commitment to reserving land along the water's edge in all industrially zoned sites such that it can be used for mitigating visual impact of industrial development, used for residential amenity and so that it will act as a buffer zone between industry and the Cork Harbour SPA.

Commit to enhancement of the Ringaskiddy town centre streetscape.

Inclusion of specific actions towards achieving protection of residential amenity.

Include as a specific aim that further development of the university/research hub at the eastern end of the Ringaskiddy peninsula would complement and build on the success of the NMCI and trending research campus.

Identify the visual envelope which must remain undeveloped so as to protect the sensitive nationally important landscape of Cork Harbour.

Within the Specific Development Objectives for each waterside industrial site, include a commitment to requiring visual mitigation both between development and the road and between development and the sea.

Identify the potential for development of a watersports centre on the eastern shores of the Ringaskiddy peninsula.

Include a commitment to working towards providing sustainable landside pleasure craft storage in Ringaskiddy or on the western side of Cork Harbour.

State Cork County Council's concern at the declining trend in bird populations in Cork Harbour and include ornithological concerns in Paragraph 3.7.5 as being an issue to be considered by the draft Plan.

Yours faithfully,



Marcia D'Alton

Independent Member, Cork County Council