



An
Bord
Pleanála

Inspector's Report 311045-21

Development	Construction of single storey house and ancillary site works
Location	Silverheights Road and North Ring Road, Mayfield, Cork
Planning Authority	Cork City Council
Planning Authority Reg. Ref.	21/40219
Applicant(s)	Javcon Ltd.
Type of Application	Planning permission
Planning Authority Decision	Refuse permission
Type of Appeal	Third Party
Appellant(s)	Javcon Ltd.
Observer(s)	None
Date of Site Inspection	23 rd September 2021
Inspector	Mary Kennelly

1.0 Site Location and Description

- 1.1.** The site is located on the corner of North Ring Road and Silverheights Road in Mayfield, Cork City. The North Ring Road (R635) connects the N8 at Tivoli with the Mallow Road (N20) at Blackpool. It is a busy Distributor Road which travels northwards through the suburb of Mayfield before it turns westwards along the northern suburbs towards Blackpool. The Ring Road has two lanes travelling north and one travelling south. Silverheights Road is a residential street, within an established housing estate, which runs eastwards from its junction with North Ring Road. It is an established and mature residential area with predominantly semi-detached houses. Silverheights Road rises fairly steeply to the east.
- 1.2.** The appeal site is located on the northern side of Silverheights Road, at the western extremity where it meets the Northern Ring Road. The properties immediately to the east, Nos. 1 and 3 Silverheights Road, comprise a pair of semi-detached dormer bungalows with a steeply sloping pitched roof. The houses are sited on reasonably sized plots which are set back by means of individual front gardens from Silverheights Road with mature landscaping.
- 1.3.** The site area is given as 0.0187ha. It is a narrow wedge-shaped site which runs parallel to the western side of No. 1 Silverheights Road. The proposed development area is bounded to the south by a 2m high painted concrete block wall which is set within the front garden area of No. 1 Silverheights Road, and to the western side by a continuation of this wall (unpainted). There is a triangular patch of lawn immediately to the south of the white-painted wall which appears to be maintained by the adjoining owners but is shown within the red line boundary. The eastern boundary is defined by the side garden wall of the adjoining property at No. 1. There is a grass verge between the footpath and the side boundary wall of the site which faces the Ring Road. The rear boundary of the site is open and abuts a vacant site which was formerly the subject of a redevelopment proposal for a 3-storey apartment building (permitted under ABP-302697). This area is shown as being within the blue line and is accessed from Boherboy Road to the north.

2.0 Proposed Development

- 2.1.** It is proposed to construct a detached single dwelling unit on the site. The floor area of the proposed dwelling unit would be 46.6sq.m. and it would be one-bedroomed. The proposed unit is single storey with a door and a window at the front and a further window recessed behind the main elevation. The southern side elevation would have a patio door facing into the proposed private amenity space. There would be no windows on the northern side or rear elevations apart from a small bathroom window to the rear.
- 2.2.** The proposed dwelling is sited towards the northern end of the site and is set back 3.35m from the northern boundary, 1m from the eastern boundary and just under 2m from the western boundary. The proposed private garden (48m²) is located to the south with a setback of 6.575m from the southern boundary. The existing concrete block walls on the southern and western boundaries would be removed and replaced by with low level walls with railings and hedging, but the existing wall along the eastern boundary would be retained. Access to the site is proposed via a new entrance at the northern end which appears to be from the site to the north in the same ownership. It is stated that the triangular patch of grass at the southern end will be transferred to the owner of No. 1 Silverheights Road.

3.0 Planning Authority Decision

3.1. Decision

The planning authority decided to refuse permission for three reasons as follows:

1. It is considered that by reason of its scale and site coverage, the proposed dwelling would represent overdevelopment of a small, restricted site which would seriously injure the amenities of the area and of adjoining properties. The proposed development would, therefore, be contrary to Objective 16.9 Sustainable Residential Development, of the Cork City Development Plan 2015-2021, and the proper planning and sustainable development of the area.
2. It is considered that the proposed development would not provide an acceptable standard of residential amenity for future residents in terms of

private amenity space. The proposed development would, therefore, be contrary to Table 16.7 Private Open Space Standards of the Cork City Development Plan 2015-2021, and the proper planning and sustainable development of the area.

3. The Planning Authority are precluded from considering the application as the proposed development has the potential to have significant adverse effects on the provision of the Cork Northern Distributor Road as envisaged in the Cork Metropolitan Area Transport Strategy.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The planning report noted the planning history of the site and area whereby a similar development proposal was refused on the subject site in March 2021 (21/49855) on the grounds of overdevelopment and impact on residential amenity, and that previously permission had been granted for a medical centre and pharmacy on the larger site to the north, which had included the subject site (06/31430 and 08/33580). It was further noted that in the meantime, planning permission had been granted (to the same applicant) for the construction of a 15-unit apartment development on the site to the north, which had excluded the subject site, and that this permission was now underway.

It was noted that the proposal would be consistent with the zoning, but concern was expressed regarding the impact on the visual and residential amenities of the area and the quality of amenity given the small scale and restricted nature of the site which appeared to be an area of 'left-over' land associated with the adjoining apartment development. The proximity to the 3-storey apartment block (5m) which is at an elevated level and to the busy North Ring Road were also of concern in terms of impact on residential amenity. It was considered that the reasons for refusal of the previous scheme had not been adequately addressed. The concerns of the Infrastructure Department regarding interference with the proposed route of the Northern Distributor Road were also noted.

Refusal of the proposal was recommended by the Area Planner and supported by the Senior Planner.

3.2.2. Other Technical Reports

Infrastructure Department – Objection on grounds of potential to have significant adverse effects on the provision of Cork Northern Distributor Road as envisaged in the Cork Metropolitan Area Transport Strategy. Refusal was recommended pending the outcome of the Strategic Route Selection for this road project, which is due to be completed in Q1 of 2022.

Drainage – No objection subject to conditions.

Environment – No objection subject to conditions.

3.3. Prescribed Bodies

Irish Water – no objection subject to conditions.

3.4. Third party observations

There were no third-party observations.

4.0 Planning History

4.1. On the subject site

21/39855 – Permission **refused** for a single dwelling unit of 47.9sq.m. This was a single storey detached unit which had one bedroom (2 bedspaces). The design of the unit was similar to the current scheme, but the site layout differed in that the proposed open space was sited to the north of the proposed unit. In addition, the kitchen/dining area was located at the northern end of the unit with a north-facing patio door. Reasons for refusal were based on overdevelopment of a restricted site which would seriously injure the amenities of the area and property in the vicinity and would not provide an acceptable standard of accommodation for future residents.

TP 08/33580 – Permission **granted** for amendment and enlargement of the medical centre and associated facilities previously granted under TP 06/31430 (see below) including vehicular access for basement car park for 66 cars. This permission had included the site of the current application/appeal.

4.2. On adjoining site to north (access from Boherboy Rd)

ABP.302697 (TP 18/37939) – Permission **granted** for construction of a 3-storey apartment building consisting of 15 no. residential units comprising 4 no. 1-bed units, 6 no. 2-bed units and 4 no. 2-bed duplex units and 1 no. 2-bed maisonette. Ancillary works included provision of car parking spaces, communal open space, bin enclosures and bike stand. Access via Boherboy Road.

PL04.248734 (TP16/37184) – Permission **refused** for construction of 9 no. dwellings and all associated site works. Board refusal on two grounds, firstly. Excessive density/layout which would not comply with DMURS and would create traffic hazard. Secondly, overdevelopment of site in terms of provision of public open space, private open space, parking and residential amenity of future occupiers.

TP06/31430 – Permission **granted** for a Primary Care Centre including demolition of existing house, derelict workshop and retail unit and construction of a one, two and three storey 2,440sq.m building which includes pharmacy, optician, café, health information centre, GP suites, dentist suites, HSE services, X-ray and other diagnostic services, administration, reception areas, vehicular access for basement car park for 66 cars from Boherboy Road.

5.0 Policy Context

5.1. Cork City Development Plan 2015-2021

- 5.1.1 The site is zoned **ZO 4 Residential, Local Services and Institutional Uses** the objective for which is “To protect and provide for residential uses, local services, institutional uses and civic uses, having regard to employment policies outlined in chapter 3”. Paragraph 15.10 states that the provision and protection of residential uses and residential amenity is a central objective of this zone.
- 5.1.2 Relevant policies contained in Chapter 16 include the following:
- 16.49 – Proposals for new residential developments
 - 16.58 – Single units including corner and garden sites
 - 16.59 – Infill Housing
 - 16.64 - Private open space for residential development

5.2. Natural Heritage Designations

Cork Harbour SPA (004030) and Great Island Channel SAC (001058) lie approx. 1.8km to 5.4km to the east, respectively.

6.0 The Appeal

6.1. Grounds of Appeal

This is a first party appeal against the PA decision to refuse permission. It is pointed out at the outset that the developer, who is currently developing the apartment development to the north, has recently purchased the subject site and that it was not in their ownership at the time of the application for the scheme to the north. It is further pointed out that the applicant has sought to address the inadequacies of the previous refusal. The main points raised may be summarised as follows:

- **Principle of Infill Housing** – notwithstanding the comments of the Area Planner in her report, infill housing is defined in the CDP as ‘Housing which fills gaps in otherwise continuous built-up frontage and is appropriate to the character of the street and/or village’. The site is a vacant gap site between the housing scheme under construction and Silverheights Road and constitutes a natural extension to the apartment scheme. It had formed part of the original scheme for a medical centre which covered both sites. This form of development is fully supported in the National Planning Framework and in the CDP (Section 16.59) which seeks to make the most sustainable use of existing serviced lands on suitable sites, subject to compliance with relevant development standards. The site is within walking distance of a range of local amenities and the area is well served by local schools, shops and services in Mayfield Shopping Centre which lies c.200m to the north.
- **Impact on visual amenity and character of area** – it will result in a building which is appropriate by reason of its scale and design and will continue the frontage to North Ring Road. The step back from the building line to the north allows for the successful transition and integration with Silverheights Road and the proposed dwelling matches the building height and roof profile of No.

1 Silverheights Rd. The more modern materials being used in the new development to the north will be matched in the proposed dwelling.

- **Impact on residential amenity** - The proposed development will have a no adverse impact on the residential amenity of adjoining properties. The proposal meets the minimum requirements for accommodation and private amenity space as set out in both the Cork City Development Plan (2015) and in the Quality Housing for Sustainable Communities Guidelines (DOELG 2007), and as such, would not result in sub-standard residential accommodation. The development has been re-designed to take advantage of the site's southerly aspect and will allow future residents to have maximum access to light and fresh air. The Northern Ring Road is located c.10m from the dwelling and is approx. 1 metre below it. The privacy of the proposed development will be ensured by the proposed wall and railing with box hedge, which will match the boundary treatment proposed for the apartment scheme.
- **No impact on Cork Northern Distributor Road** – it is acknowledged that CMATS had envisaged the Distributor Route taking the route of the Northern Ring Road but the study area for the route has been extended significantly as defined in Fig. 3.1 of the Brief published by the P.A. It was not raised in the previous application (21/39855). Given the infill nature of the site and the fact that it is stepped behind the building line of the scheme under construction to the north, there is no potential to impact the route selection process. The published brief 'For the Provision of the Preferred Route Selection Report for the Proposed Northern Distributor Road' shows an indicative cross section of approx., 24m. Given that the existing NRR has a cross section width of 27 metres from the boundary walls of the properties to the west to the site boundary at this location, it is submitted that there is no prospect of an adverse impact arising on the route Selection process.

6.2. Planning Authority Response

The P.A. has not responded to the grounds of appeal.

7.0 Assessment

It is considered that the main issues arising from the appeal are as follows: -

- Principle of development
- Impact on residential amenity
- Standard of residential accommodation
- Impact on character and visual amenity of area
- Impact on site selection process for Northern Distributor Route

7.1. Principle of development

7.1.1. The site consists of a vacant site which is located within an established residential area. The policies set out in the Cork City Development Plan 2015 at 16.49 state that proposals for new residential development should take into account, inter alia, the accessibility of a site in terms of proximity to public transport, neighbourhood facilities and amenities and in terms of access by various means of transport. This policy is in accordance with national policy to increase the density of residential development in areas which are serviced, well served by amenities and public transport and in close proximity to facilities. The site is located in such an area which is in close proximity to, and within walking distance of, the Mayfield Shopping Centre and to local neighbourhood amenities such as a church and schools.

7.1.2. The proposed development is considered to fall within the category of “infill housing” as described at 16.59 of the Cork City Development Plan. The policy for such developments seeks to make the most sustainable use of urban land, and infill development will be considered on a case-by-case basis, taking into account the impact on adjacent houses, traffic safety etc. It is further stated that the P.A. may relax standards in certain circumstances in the interests of developing vacant, derelict and underutilised land. Infill housing will be required to

- Not detract from the built character of the area.
- Not adversely affect the neighbouring residential amenities.

- Respect the existing building line, heights, materials and roof profile of surrounding buildings.
- Has an appropriate plot ratio and density for the site.
- Adequate amenity is proposed for the development.

7.1.3. The proposed development relates to a vacant site which is currently in a poor state of maintenance and detracts from the amenity of the established residential area. The plot ratio (and site coverage) of the proposed unit would be 0.26 and the density would be approx. 53w/ha. Although the prevailing density in the area is likely to be lower than that, it is noted that the density of the recently permitted apartment scheme to the north is in excess of 100dw/ha. It is a single storey one-bedroomed residential unit which has a ridge height of less than 5 metres. It is therefore considered that the proposed development is not excessive in terms of its scale and density and would be appropriate in principle subject to compliance with normal development standards for new residential development as set out in 16.59 and outlined above. These matters will be considered in the following paragraphs.

7.2. Residential Amenity

7.2.1. The concerns raised by the planning authority related principally to potential overshadowing from the 3-storey apartment block that is to be built on the adjoining elevated site to the north and to the inadequacy of the private garden to be provided, including its proximity to the North Ring Road and the public footpath to the west. As noted by the P.A., a sunlight/daylight analysis or shadow study has not been submitted, and neither has a contiguous elevational drawing of the proposed dwelling together with the permitted scheme to the north. However, the submitted drawings include a North Point, cross sectional drawings, finished floor levels (for both sites) and ridge/eaves levels (for the proposed development and No. 1 Silverheights Road).

7.2.2. It is noted that the proposed layout of the unit and the site layout have been revised in response to the reasons for refusal of the previous scheme (21/39855). In particular, I note that the private amenity space has been relocated from the northern side of the site, where it would have been in close proximity to the permitted apartment block, to the southern side of the site. As the apartment block is to the

north, it is unlikely that there would be an overshadowing issue, but it would have been an overbearing presence, with potential to affect daylight. However, the revised layout includes a re-orientation of the unit so that the living accommodation faces south with a patio door and the northern elevation no longer includes any window openings. The lighting of the proposed unit is significantly improved with a westerly and southerly aspect and good quality screening and landscaping.

- 7.2.3.** The proposed FFL is 76.60m and that of the adjoining permitted apartment block is given as 79.15m with the ground levels in the adjoining proposed parking area at c.78.0m. Thus, there is less than a 3-metre difference between the proposed finished floor levels and a distance of c.4.5 metres between the two buildings, which could potentially result in an overbearing impact. However, the design and layout of the proposed single-storey unit would minimise the impact of the taller structure to the north due to its southerly and westerly orientation. In terms of the relationship with No. 1 Silverheights Road, there is a difference of approx. 3 metres in the ridge heights but at a distance of c.5 metres it is not likely to result in any loss of amenity to either property.
- 7.2.4.** The front of the proposed dwelling faces the Northern Ring Road but opens onto a private amenity strip within the site boundary and is separated from the Ring Road by means of a wide grass verge. The existing masonry wall will be replaced by a low wall with railing and box hedge which will provide a good level of privacy to the occupants of the appeal site. The private amenity space is provided in the form of a side garden rather than a traditional rear garden but is immediately adjacent to and overlooked by the living area of the proposed unit. The size of the amenity area meets the minimum standard in the Development Plan of 48m² and it is of a reasonable shape and depth. It is not overlooked by any other properties. It is noted that the triangular patch of lawn to the south of the proposed amenity area is to be transferred to the adjoining owner, which means that it will effectively remain as part of that garden.
- 7.2.5.** Thus, it is considered that the design and layout of the proposed unit would not give rise to any significant negative impacts on the residential amenities of the adjoining properties and would not adversely affect the residential amenities of the future occupants.

7.3. Standard of residential accommodation

- 7.3.1.** The proposed development is for a one-bedroomed dwelling unit with a stated total floor area of 48.6sq.m. The floor area of the proposed bedroom is given as 12.7m², the aggregate living area as 23.8m² and the storage area as 2.7m². The appropriate standards are set out in Quality Housing for Sustainable Communities Guidelines (DOEHLG 2007) at 5.3.2 and Table 5.1. I note that the target floor area for a one-bedroom 2-person house is 44m², which is considered appropriate.
- 7.3.2.** In terms of individual room sizes, the proposed development meets the targets (relating to a single-storey 1-bed unit) for aggregate living area (23m²), aggregate bedroom area (11m²), and storage area (2m²). Minimum widths are also given for bedrooms (2.8m for double and 2.1m for single) and for living rooms (3.3m). The width of the bedroom is 2.8m and of the combined living/dining room is indicated as 4.06m. It is a relatively large room (23.8m²) and is 5.345m in length with a patio door leading to a south-facing private amenity space. In these circumstances, it is considered that the layout and room sizes are adequate for a one-bedroomed dwelling and generally meet the standards of accommodation set out in the Guidelines.
- 7.3.3.** It is considered that the site of the proposed development is one which is identified in the Quality Housing for Sustainable Communities Guidelines as being appropriate for redevelopment for residential purposes. The guidelines encourage use of vacant and derelict buildings or poorly utilised sites for conversion to residential use (1.3). It is stated that such development helps to restore, strengthen and upgrade the social and physical fabric of an area and to eliminate derelict and under-utilised areas, particularly where such development maximises the use of existing infrastructure (1.4). The site is located in an established residential area with a wide range of services and facilities to support such development within the neighbourhood. Thus, the proposed development would provide a reasonable quality of residential accommodation as a one-bedroomed unit.

7.4. Impact on visual amenity

- 7.4.1.** The planning reports questioned whether the site could be truly considered as an infill development. This matter was addressed above, but it is considered that the

criteria set out in 16.59 of the Cork City Development Plan which require such infill development to not detract from the built character and to respect the building lines, heights, materials and roof profiles of surrounding buildings should also be examined.

7.4.2. The site is effectively a corner site which is similar to a side garden. However, it is considered that it is sufficiently visually removed from the pairs of semi-detached houses on Silverheights Road and from the larger former commercial/residential site to the north to allow a bespoke design approach. It is set back and 'tucked behind' the existing garden wall (white painted) of No. 1 and the proposed unit would be well set back behind the established and well-defined front set back of Silverheights Road. The site is visually removed from the site to the north by reason of the difference in levels and orientation of each site (to the west and to the north, respectively). It is considered that the design and layout of the proposal successfully utilises the narrow shape of the site and the unobstructed westerly and southerly aspects to maximise the amenities of the site. The proposal to continue the form of boundary treatment with a low wall and railings and box hedge, together with the single storey pitched roof dwelling of modest scale and height with similar would help the dwelling to integrate into its surroundings.

7.4.3. It is considered that the proposed dwelling respects the character and style of the established residential development in the vicinity. The proposed infill development, therefore, by reason of its layout, scale and design, would not detract from the character of the streetscape and would not injure the visual amenities of the area.

7.5. Potential impacts on Route Selection for Cork Northern Distributor Road

7.5.1. The P.A.'s Infrastructure Development Directorate has raised serious concerns regarding the prematurity of the application on the basis of the site lying within the one of the route corridor options for the proposed Cork Northern Distributor Route. The internal memo dated the 9th of June 2021 refers to the strategic importance of the route which has been identified in the Cork Metropolitan Area Transport Strategy 2040, (CMATS) which has been developed by the National Transport Agency in collaboration with Transport Infrastructure Ireland, Cork City Council and Cork County Council. It is further stated: -

“Cork City Council is currently undertaking a project to determine the Route Selection for the future Cork Northern Distributor Road. This project entails identifying a suitable route corridor for the provision of transport solutions for private vehicles, buses, cyclists and pedestrians. A strategic assessment of all viable routes is currently underway to fulfil this objective. The precise route of the proposed CNDR is unclear at this stage. As such the site of the proposed development of this application falls within one of the route corridors that is currently being considered for the Strategic Assessment Report.”

The SEE considers that the proposed development has the potential to have significant adverse effects on the provision of the road project. It is recommended that the application be refused at this stage pending the outcome of the Route Selection process, which is expected to be completed in early 2022.

- 7.5.2.** It is a Strategic Objective (5.1h) of the Cork City Development Plan 2015-2021 to protect the capacity, efficiency and safety of national roads and associated junctions while maintaining and enhancing the economic vibrancy of Cork City. Objective 5.18 contains the Strategic Road Infrastructure Objectives, and Subsection (c) relates to the Northern Ring Road. It is stated that this road project, along with the Dunkettle Interchange Upgrade, is one of the key strategic road priorities for the city. It is stated that it would complete the ring of Cork City from the N8 (Glanmire Bypass) to the N22 (Ballincollig Bypass) and would also connect with the N20 (Blarney - Limerick) and that routes have been selected (but currently suspended).
- 7.5.3.** Since the adoption of the CDP in 2015, the Northern Ring Road project has become a central feature in the CMATS 2040, (referred to as the Northern Distributor Road project). CMATS is described as a coordinated land-use and transportation strategy for the Cork Metropolitan Area which sets out a framework for the planning and delivery of transport and infrastructure services to support the Cork Metropolitan Area’s development up to 2040. I note from the Cork National Roads Office website (corkrdo.ie) that the project has since been renamed the Cork City Northern Transport Project and that it has now been included in the National Development Plan 2021-2030. It is stated that consultants have been appointed to examine the Route Selection Options and to progress the project to Phase 2 of the ‘TII Project Management Guidelines’. This update is dated the 14th of October 2021.

7.5.4. Section 2.9 of the Spatial Planning and National Roads Guidelines (2012) requires that development plan objectives should retain required lands free from development and ensure that measures are put in place so that any adjacent development of sensitive uses are compatible with the construction of long-term operation of the road. It is considered that the development objectives in place are consistent with this advice. It is noted that the First Party believes that as the Study Area (Brief for the Provision of the Preferred Route Selection Report for the proposed CNDR and reproduced in the appellants' grounds of appeal) is wider than previously envisaged, this should be taken into account. It is further submitted that the current width of the ring road is estimated at 27 metres which is wider than the width of the typical cross section of the proposed distributor roads, and furthermore, as the site boundary is stepped back behind the building line of the site to the north, there is no potential to impact the current route selection process. Although these are valid points, I would point out that the site to the north is currently vacant and whilst development may have technically commenced at some point since permission was granted in 2019, at the time of my inspection there was no evidence of any significant development works having taken place. Furthermore, there is a large green island which extends alongside the NRR to the south of Silverheights Road.

7.5.5. Notwithstanding the points made in the grounds of appeal, there is no evidence that the site of the proposed development no longer falls within one of the Route Corridor Options that is currently being considered for the Strategic Assessment Report. The SEE is of the opinion that the site does lie within one such corridor and that the proposed development could adversely affect the route selection process. As noted above, the Route Selection process is currently, actively underway and the preferred route is not as yet clearly defined. I would, therefore, have to agree with the SEE of the P. A's Infrastructure Development Directorate that the proposed development is premature pending the identification of this route and could prejudice plans for the design of this strategically important road project. The proposal would contravene Objective 5.18 of the CDP, which is consistent with the advice in the Spatial Planning for National Roads Guidelines (DoECLG 2012), and with the more recently published CMATS 2040 and the National Development Plan 2021. Given the strategic importance of the route, it is considered that the proposed development would be premature pending the determination of a final road layout for this project.

7.6. Environmental Impact Assessment

Having regard to the nature, size and location of the proposed development, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

7.7. Appropriate Assessment

Great Island Channel SAC (001058) and Cork Harbour SPA (004030) lie approx. 5.4km and 1.8km respectively to the east/southeast. There are no known hydrological links to the protected sites. Given the scale and nature of the development, the distances involved, that the site is located in an established urban area, on serviced lands, it is considered that no appropriate assessment issues are likely to arise.

8.0 Recommendation

8.1 It is recommended that permission be refused for the reasons and considerations set out below.

9.0 Reasons and Considerations

Having regard to the location of the site of the proposed development within a route option corridor which is currently under consideration as part of the Cork City Northern Transport Project (formerly known as the Cork Northern Ring Road) and which is a strategically important project critical to the delivery of planned development, the preservation of which is an objective of Cork City Development Plan 2015-2021 and is identified as a strategic transport route in the Cork Metropolitan Area Transport Strategy 2040, by reason of the nature and scale of the proposed development, would be premature development pending the determination of the preferred route alignment of this road project. The proposed development would, therefore, contravene an objective of the current Cork City Development Plan, would be contrary to the provisions of the Cork Metropolitan Area Transport Strategy and to Section 2.9 of the Spatial Planning and National Roads Guidelines for

Planning Authorities, (issued by the Department of the Environment, Community and Local Government in 2012), and would be contrary to the proper planning and sustainable development of the area.

Mary Kennelly
Senior Planning Inspector

9th January 2022