

Dear Sir or Madam,

On behalf of my family and I, I wish to register an objection to the proposed strategic housing development at the Cork County Council GAA Lands, Old Whitechurch Road, Kilbarry, Cork. I am a resident of the Old Whitechurch Road who has a boundary to the south of the proposed development. I object to the proposed development on the following premises:

1. Access from the Old Whitechurch Road.
2. Location of the 3 story duplexes and Creche within the proposed development
3. Density and type of dwelling
4. The environmental impact on the Old Whitechurch Road

I object to access from the Old Whitechurch on the proposed Cork County Council GAA development site on the following grounds:

Road safety:

As per the pre planning consultation opinion point 4 *“Consideration should be given to the design of the junction with the proposed distributor road demonstrating that adequate sightlines can be achieved at this location”*. The proposed location of the main access from the Old Whitechurch Road labelled Junction1 on the EIAR cannot support the minimum 59-meter sightline as specified by the developer's response to the opinion. Despite Drawing No. 19215- JBB-00-XX-DR-C-05001 as prepared by JB Barry Consulting Engineers illustrating adequate provision of 59 meters in reality it is not possible. The proposed access is located on a severe bend at the crest of a hill see Figure 1below.

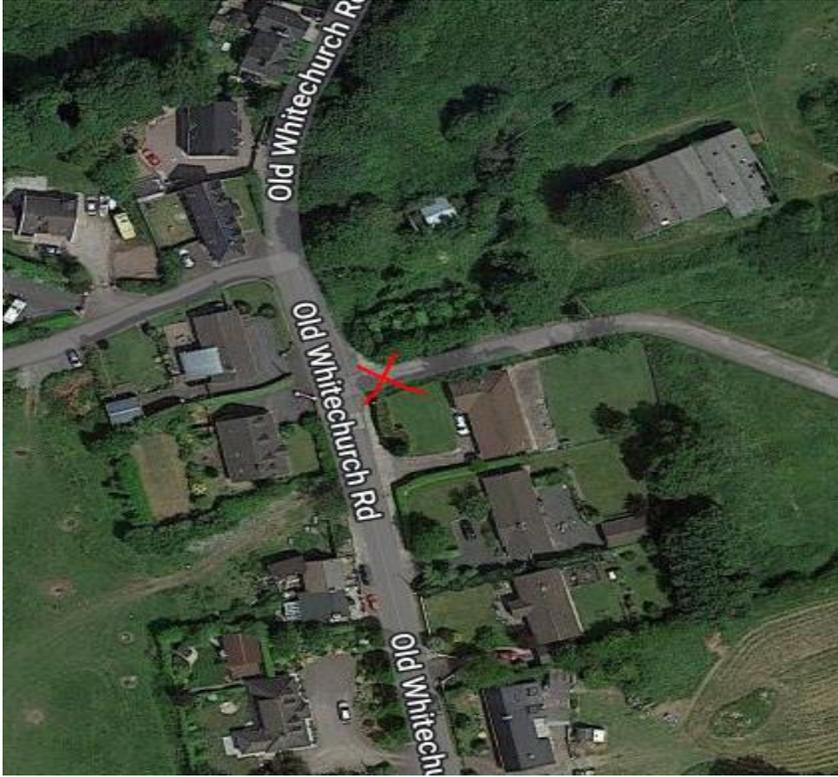


Figure 1 Satellite view of proposed access from Old Whitechurch Road.

Location of access from the Old Whitechurch is limited because of the terrain and adjoining properties.



Figure 2 View of proposed access to development site



Figure 3 View North of the proposed access to development site

From Figure 3 it is apparent that the 59m sightline is not available. Moving the access to the north of the figure pushes the access downhill and restricts the sightline to the south because of the impeding hill as illustrated by Figure 4.



Figure 4 View South of the proposed access moved to the North and apex of corner

Moving the access to the south of the Figure 1 is limited because of the adjoining properties and restricts the view to the north further because of the corner.

Connectivity between the large City Council residential development lands at Old Whitechurch Road as outlined in red in Figure 5 and the proposed orbital public transport corridor along the internal distributor road highlighted in blue will pose a significant risk to the public safety of the existing residents of the Old Whitechurch Road and those residents of the proposed developments. Connectivity will provide a rat run for commuters, Heavy Goods Vehicles (HGV) and Light Goods Vehicles (LGV) travelling East and West wishing to avoid the busy junctions of the N20(Cork-Limerick Road). Compounding this is the proposed junction of the Old Whitechurch Road and the planned Northern Distributor Road (NDR) which will also add vehicles and have an unwanted cumulative effect on traffic in the area.

Traffic on the Old Whitechurch Road is currently low with 652 traffic movements as per the Annual Average Daily Traffic (AADT) contained within the proposed developments Environmental Impact Assessment Report (EIAR). The existing low traffic volumes are largely due to the low density of dwellings in the area and limited access. Access to the Old Whitechurch Road is provided from the Old Mallow Road (Junction 2 EIAR) under passing the Cork/Dublin railway line via a bridge with a height of 4.12m. This height restriction limits the types of vehicles which can use the road. In addition, the Old Whitechurch Road currently has a speed limit of 50 km/h and is protected by speed ramps making it uninviting to commuters.

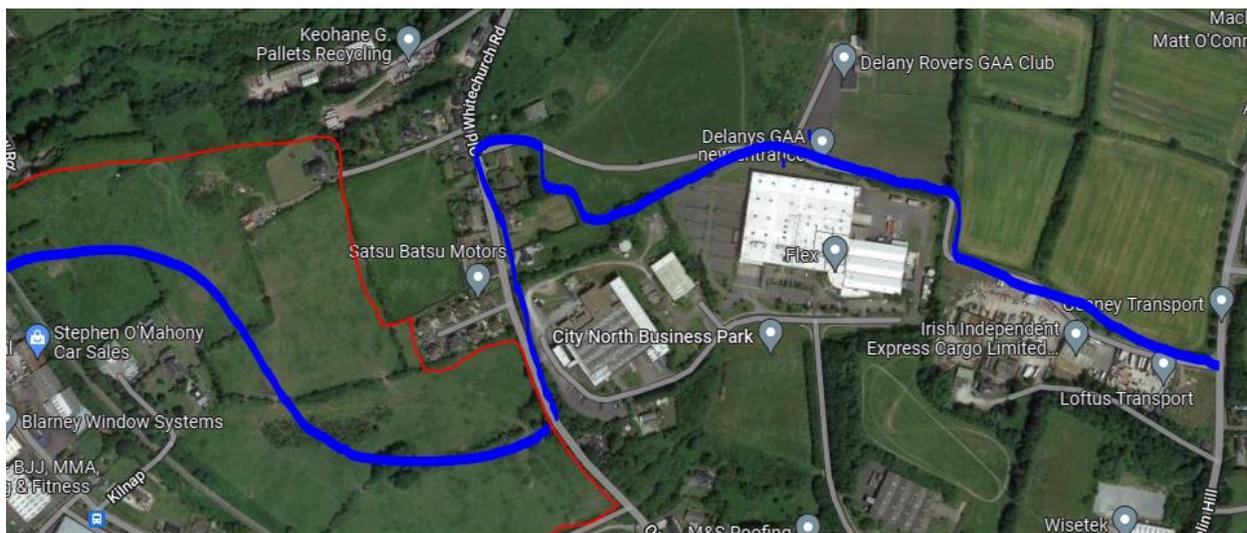


Figure 5 large City Council residential development lands outlined in red and proposed orbital public transport corridor highlighted in blue

Access from the proposed development will increase traffic significantly at Junction 1 (EIAR) the main access to the proposed development on the Old Whitechurch Road and Junction 2 (EIAR) of the Old Mallow Road and the N20.

Noise:

As part of the Environmental Impact Assessment Report (EIAR) an environmental noise survey was conducted in order to quantify the existing noise environment in the vicinity of the proposed development. As per normal procedures three noise sensitive receptors were identified two of which were on the Old Whitechurch Road and the baseline noise was measured at these locations on the 26 & 27/05/2022. Location 1 and Location 2 pertained to the existing detached dwellings on the Old Whitechurch Road and the survey demonstrated that the background noise in both locations is excellent. The EIAR estimates the impact of the development during the operational phase using four principal noise sources one of which is '*Vehicular traffic on new internal roads*'. MHL Consulting Engineers predicted Annual Average Daily Traffic (AADT) traffic volume as 2,707 movements. Using this data the noise emission levels were predicted at the Old Whitechurch Road Dwellings as $L_{Aeq}49$ daytime and $L_{Aeq}42$ nighttime (page 232 of EIAR). The background noise measured on the 26/05/22 was $L_{Aeq}49$ daytime and $L_{Aeq}38$ nighttime (page 222 of EIAR). This suggests there will be no increase in noise pollution from the predicted 2,707 traffic movements during the daytime, which is incredible or is incorrect.

The method used for estimating the noise impact does not account for different vehicle types or terrain. Aspects of the noise survey was conducted in accordance with ISO and BS standards. The method used for estimating the noise impact from the internal road is not documented as being performed in accordance with any standard. A better method of predicting the impact of road noise and is contained within the British Standard is the Calculation of Road Traffic Noise (CRTN). This method accounts for

the type of vehicle including HGV and terrain. Using this method, the road traffic noise will be in the region of 60-65 dB.

Basic noise level $L_{10}(18\text{hour}) = 29.1 + 10 \text{ Log}_{10}Q \text{ dB(A)}$ ($Q = \text{Total Flow}/18\text{hr day}$)

• Correction for %HGVs (p) and Mean Traffic Speed (V) = $33 \text{ Log}_{10}(V + 40 + 500/V) + 10 \text{ Log}_{10}(1 + 5p/V) - 68.8 \text{ dB(A)}$



Figure 6 Impact from the proposed main distributor road and increased traffic volumes on the Old Whitechurch Road

In addition to the inevitable increase in noise level from the main distributor road, five properties (including myself) with boundaries to the south and west will be sandwiched between the existing Old Whitechurch road and the new internal distributor road. The AADT predicts traffic movements to increase currently from 652 to 2,146 with the development, representing a 329% increase in traffic and an increase of 5.2 dB in sound levels on the Whitechurch Road alone. According to the World Health Organization (WHO), *“prolonged exposure to environmental noise is associated with an increased risk of negative physiological and psychological health outcomes (WHO, 2018). These include cardiovascular and metabolic effects, cognitive impairment in children, as well as severe annoyance and sleep disturbance”*. The WHO strongly recommends reducing noise levels below 53 dB. With the predicted increase of the 5.2 dB on the Old Whitechurch Road then the L_{Aeq} daytime will increase to 54.2 dB outside the guidelines as recommended by the WHO (Available from <https://www.eea.europa.eu/publications/environmental-noise-in-europe>, page 46).

It must be noted that an increase of 10 dB is a doubling of noise so an increase of 5.2 dB is significant. Adding the predicted 5.2 dB increase to a more accurate estimation of noise increase from the new distributor road, the creche, noise from 319 dwellings, green areas and 319 heat pumps with an average sound level of 50 dB will unavoidably lead to a doubling of sound pressure level on the Old Whitechurch Road. An easy method of mitigating for this increased road safety hazard and increased noise climate is to deny access to the proposed development site from the Old Whitechurch Road thereby reducing the volume of traffic estimated by the AADT in the report.

I object to the location of the Creche and three-story duplexes within the proposed Cork County Council GAA development site on the following grounds:

Noise:

As noted earlier a background noise survey was performed as part of the EIAR. For this assessment three locations were identified as noise sensitive receptors Location 1, which is illustrated by the letter X in Figure 7, was the dwellings on the Old Whitechurch Road. Noise from creche was also identified as principal source of noise in the EIAR and is proposed to be situated adjacent to the rear gardens of the existing dwellings just meters from Location 1, a noise sensitive receptor. The survey notes *“that noise emission levels measured from children shouting / exclamatory voices measured during simulated conditions are of the order of 89dB L_{Amax} and 78dB L_{Aeq} when measured at a distance of 1m from the source”* but average noise emission levels from the creche playground were predicted at a level of the order of 48dB L_{Aeq} at the nearest dwelling at a distance of 25m.



Figure 7 Creche location adjacent to existing properties on the Old Whitechurch Road.

The predicted noise level of 48dB L_{Aeq} at the nearest dwelling is based on residents not using their back gardens. Three of the properties with boundaries belong to retirees all over 70 years of age. The report deems the noise impact from the creche as negligible because it predicts the noise level to be 48dB L_{Aeq} at 25m but from Figure 7 there will be instances when residents will be only a number of meters from the creches boundary (when enjoying the current peace and tranquility of their back gardens on afternoons).

The mitigation proposed is “a minimum 2m high boundary noise barrier wall and supplemental tree planting along the western boundary line” further reducing the sightlines to the prevailing countryside

and daylighting of the existing residents. The mitigation measures proposed are inadequate and unsightly. The report acknowledges that *“high pitched shouting and exclamations from the creche will alter the current noise characteristic of the vicinity”* and is why I propose an alternative location for the crèche at the Eastern boundary of the proposed development closer to the Delaney’s GAA pitches. This is a more apt location because the area already shares the characteristics of the new predicted noise climate i.e., *“high pitched shouting and exclamations”* during training and on match days. Even at a distance of a few hundred meters shouting can be heard by the residents of the Old Whitechurch Road during training and matches. Relocation of the creche would also reduce the traffic noise at the noise sensitive receptor Location 1 on the Old Whitechurch Road.

Inappropriate Design

Until 2021 the dwellings on the Old Whitechurch Road and the proposed site lay outside the city boundaries and was not zoned for residential development. Indeed, an area of the proposed scheme is still not zoned for residential development and the opinion of the Board states that further consideration is required by means of *“a detailed statement of consistency and planning rationale should be provided, clearly outlining how, in the prospective applicant’s opinion, the proposed development is in compliance with local zoning objectives having lands zoned Public Open Space (Objective NE-O-03), and the proposed distributor road and creche on lands zones for Industry (Objective NE-I-01) in Cobh Municipal District LA”*. The response by the applicant is contained within a *“Statement of Material Contravention”* produced in response to the questions raised by the Opinion. Because of the historic A2 zoning which existed in the area until 2021 the dwellings on the Old Whitechurch Road currently consists of low-density, one-off houses. A small high quality residential housing estate, Bridgeview Heights, consisting of 14 semidetached story and a half dwelling was built about 25 years ago



Figure 8 Current low-level dwellings on the Old Whitechurch Road

All the dwellings forming the boundary with the proposed development consist of either single or one and a half story's as per the requirements of the historic planning policies. Presuming the height of the duplexes are typical of three-story dwellings i.e., 10m and the fact that the ground on western boundary of the proposed development is circa 1.5m higher than the level of the Old Whitechurch Road then the skyline will be dominated by buildings approximately 11-12m greater than the level of the road and will be out of character with the area. The location of three-story duplexes, blocks A, B and C on the WN boundary of the site just meters from one bungalow and three dormer bungalows on the Old Whitechurch Road is out of character with the area and are more suited to an urban scheme. The existing dwellings on the Old Whitechurch Road will be overlooked and the sightlines of the prevailing countryside will be lost to residents that have lived in the area for decades. This WN location of the site is more suited to the 4 bedroom detached family homes planned for the NE boundary of the development.

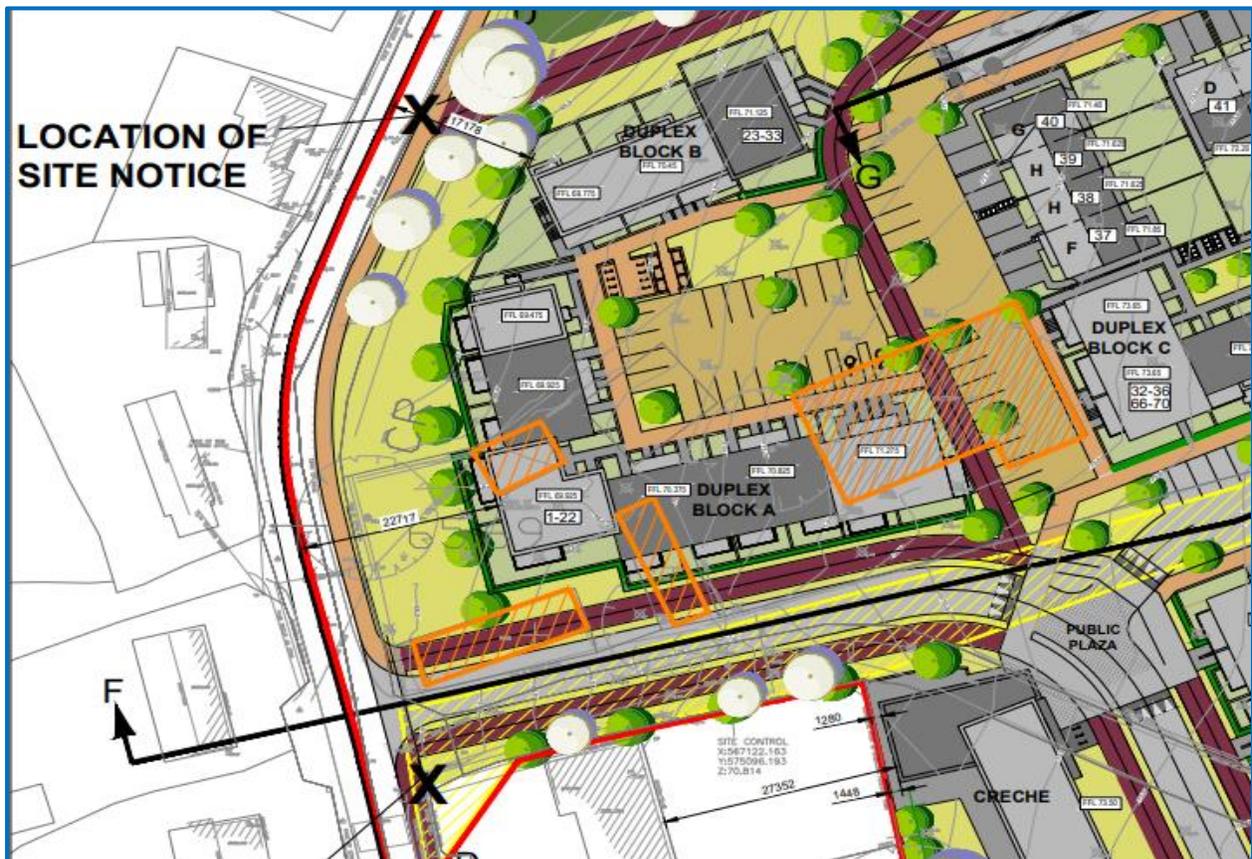


Figure 9 Proposed location of three-story duplexes and effect on existing dwellings on the Old Whitechurch Road

Duplexes are more suited to an urban environment hence; I propose relocating them to the center of the development where they will have less of a visual impact on the rural skyline and the current housing mix of the Old Whitechurch Road.

I object to the density and type of dwelling proposed for the Cork County Council GAA development site based on the following grounds

Density of Dwelling Argument

The Regional Spatial and Economic Strategy (RSES) is based on a regional settlement hierarchy and contains the Cork Metropolitan Area Strategic Plan (MASP). MASP provides a guide for investment and sustainable development across the Cork Metropolitan Area *“The Regional Spatial and Economic Strategy for the Southern Region 2020 (RSES) includes a Metropolitan Area Strategic Plan (MASP) for Cork. Section 7.3 of the MASP identifies strategic residential nodes along the Metropolitan rail line, where it is noted that Kilbarry and the Old Whitechurch Road area have opportunities for significant mixed-use regeneration, residential and enterprise development. It is noted that the potential residential yield envisaged for this area under the RSES is 950 no. Units.”* Figure 10 below and Table 1 illustrate seven active and proposed development sites labelled A to G in red font within a 1km southern radius of the Cork GGA Board development site and along the Metropolitan rail line.



Figure 10 1Km southern catchment area of residential active and proposed developments for the Kilbarry area

Active & Proposed Development Sites Within Kilbarry/Old Whitechurch Road Area						
Site	Active	Proposed	Site	No. Units	Aparts	Duplexes
A	No	Yes	Redforge Road	114	114	No
B	Yes	No	Sunbeam	115	Yes	Yes
C	Yes	No	Springgrove	60	No	Yes
D	Yes	No	Old Garda Station	14	6	No
E	Yes	No	Bolands	57	16	Yes
F	Yes	No	Cork City Council's LIHAF development lands	600 plus	Yes	Yes
G	No	Yes	Cork County Council GAA Lands	319	63	53

Table 1 Breakdown of Active and Proposed Development Sites in Kilbarry Area

From Table 1 and assuming that the Local Infrastructure Housing Activation Fund (LIHAF) develop the minimum 600 units proposed then without any development of the Cork County GAA grounds the 950-unit yield envisaged for the area by the RSES will be breached by 10 units. Adding another 319 units, at the proposed Cork County GAA grounds, to the mix will produce 1,279 units exceeding the envisaged yield by 33% and increasing the population of the area by 3,517 people (as per EIAR data). This implies the area will be overdeveloped, exceeding the targets specified by the RSES 2020 strategy and puts further strain on a residential area that is already poorly served by critical public infrastructure required for sustainable development.

National Policy Objective (NPO) 33 prioritises “*the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*”. The EIAR and the associated supporting planning documentation for the proposed development frequently refers to a 15-minute city as a means to suggest the proposed development will be sustainable. The proposed density of the development of the GAA grounds on the Old Whitechurch Road cannot be a model for sustainability because the area currently and will lack the basic infrastructure required for a sustainable development such as public transport, educational institutions and economic/labor opportunities to serve 1,279 units or 3,517 people.

Lack of Public Transport Infrastructure

The Old Whitechurch Road is not directly served by any public transport. The number 215 public bus has the nearest stop (ID 255151) at 1 km south of the proposed development site. The other stop on the Upper Kinvara Road (ID 244381) mentioned on the EIAR is not accessible in 15 minutes by foot or bicycle because there is no direct route from the Old Whitechurch Road. Stop ID 244381 is currently only accessible from the Old Whitechurch Road via the Red Forge Road and Dublin Hill a journey of approximately 3.2 km. The 215 is a double height bus which cannot access the road because of the

railway bridge that has a height of 4.12m. This bus travels to the City Centre and passes Commercial/Retail Areas. With the closest bus stop at 1 km the bus is not used by the young or elderly because the return walk to the Old Whitechurch Road is via a severe 1 km walk up hill. Going forward the Cork Metropolitan Area Transport (CMATS) Strategy 2040 will introduce high frequency orbital bus services upon completion of the Northern Distributor Road (NDR). The NDR is recognized as a key objective for the strategy and is hoped to be completed by 2031. CMATS also propose other significant improvements to the public transport facilities including the well touted (20 years) reopening of the Kilbarry Railway Station, 1.3 km to the south. The Kilbarry Station is located just 300m past stop ID 255151 and may not be used as frequently as hoped because of the severe climb back to the proposed site. Currently with limited access to public transport and no short-term delivery of public transport infrastructure the only real mode of transport for the Old Whitechurch Road residents is the private car which is totally contradictory to 15-minute city and National Strategy Objective (NSO) 4 ““Sustainable Mobility” is aimed at facilitating a move away from polluting and carbon intensive propulsion systems towards new technologies, as well as facilitating an increase in the patronage of public transport and supporting greater levels of transport mode choices”.

Lack of Educational Infrastructure

Figure 11 illustrates a 2 km catchment area of the proposed development including the primary and post primary educational schools in the vicinity. Contrary to Table 17.3 and 17.4 purporting to having eleven primary and five post primary schools within a 2 km catchment area of the site there are only two.

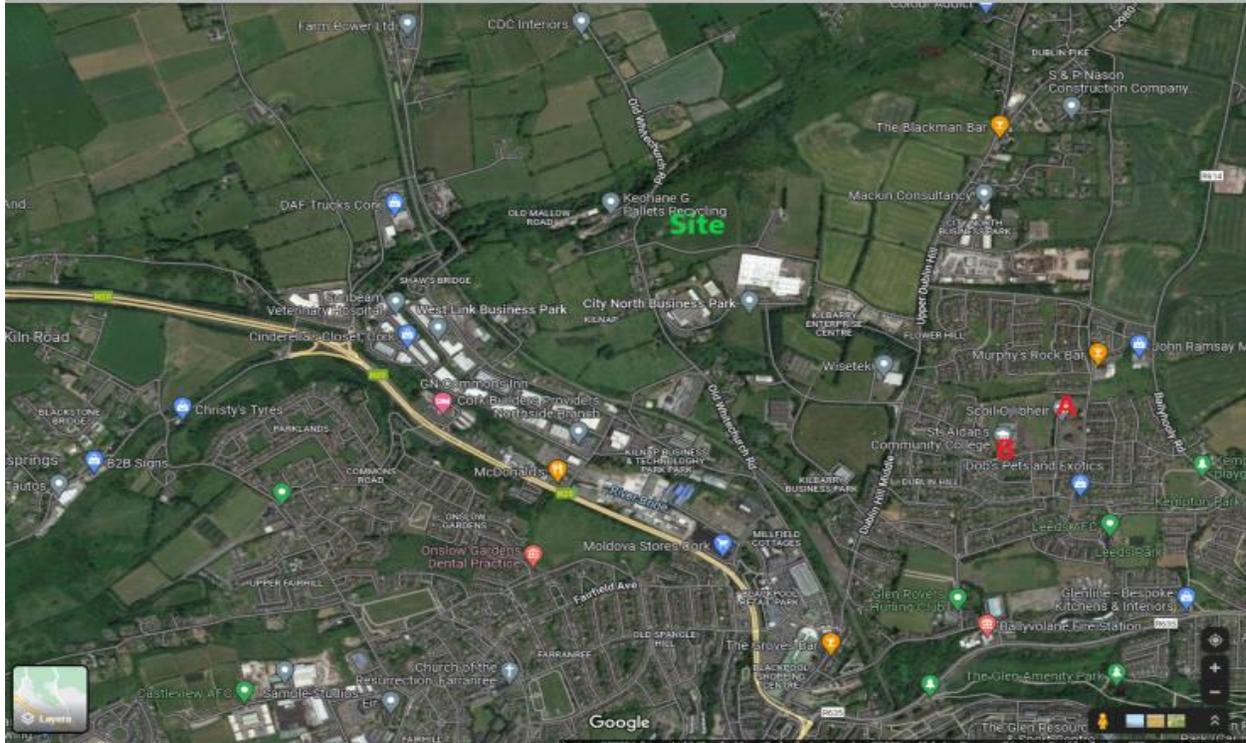


Figure 11 A 2km Catchment area of the proposed development including primary and post primary educational schools

The only two schools within the two 2 km catchment area are primary school (A) Scoil Oilibheir and post primary school (B) St Aidans. Neither of these schools are readily accessible from the Old Whitechurch Road. Traditionally residents of the Old Whitechurch Road sent primary age children to Rathpeacon 2.6 km from the GAA grounds. Children of post primary age traditionally attended Blarney 6.4 km or The North Monastery 3 km. Using the data from the EIAR Table 17.2 with the addition of 1,279 units in the area then the population of the Kilbarry area will increase by 3,517 people. Those of primary school age will increase by 422 and those of post primary age by 295. With Scoil Oilibheir having 542 pupils enrolled in 2016 then an additional 422 will require 964 places or a 78% increase in capacity. Similarly, St Aidans had 374 pupils enrolled in 2016 then this would require a 79% increase in capacity to 669. Of course, the alternative is to disperse these populations across the schools listed in Tables 17.3 & 17.4 but this means greater commuting distances and is again at odds with sustainable development and NSO 10 “Access to *Quality Childcare, Education and Health Services*” is prefaced on the fact that good access to

a range of quality education and health services is key to creating attractive, successful, and competitive places” or to build new schools.

Lack of Economic/Labor opportunities

From the EIAR *“the potential employment opportunities for the future residents will be limited, given the fact that residential development is the predominant land use proposed”*. Although there are several industrial and commercial units in the area the employment opportunities for an estimated working population of 2,291 (from Table 17.2) will be very limited. This will mean the majority of the working population will commute to their workplace via private car. The lack of employment opportunities in the area conflicts with National Policy Objective 11 *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth”*. The development will not meet NPO 11 in regard to generating more jobs and exceeds targeted growth as set out by RSES 2020.

Thus, this proposed development does not meet the National Policy Objective (NPO) 33 of *“sustainable developmentat an appropriate scale of provision relative to location”* for the arguments I have just made.

Type of Dwelling Argument

In addition to NPO 33 the former Minister for Housing Eoghan Murphy published the Design Standards for New Apartments (DSFNA) (2018) and point 2.2 relates to location and states:

“In general terms, apartments are most appropriately located within urban areas. As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centers and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range

of urban amenities including parks/waterfronts, shopping and other services, are also particularly suited to apartments”

I believe I have outlined in my previous argument regarding density the key reasons why apartments are not suited to the Old Whitechurch Road however I would also like to highlight:

- Until 31/05/2019 and the extension of the city boundary the area was in fact not part of the city council but part of the county council. With dwellings currently at a density of 0.5 –3 per hectare the area is certainly not inner urban. The moving of the county bounds allowed the rezoning of the GAA grounds in 2021 but this still does not make the locality “*inner urban*”.
- The proposed development is not close to core urban centers
- Frequent public transport is limited and cannot be provided promptly or easily
- The proposed development is not close to locations of employment

Also, of the known mix for the planned 1,279 units on the Old Whitechurch Road/Kilbarry area apartments account for 199 units or 15.6 % of the proposed accommodation. According to the Cork City Development Plan 2022- 2028 the target value for apartments is 20 % or 256 units from the planned 1,279 units. Without knowing the number of apartments planned for the Councils LIHAF and Sunbeam development we must assume they will fulfil the 20% target set by Cork City development plan and provide 143 apartments. This will raise the number of apartments in the area to 342 giving a ratio of 27% for the schemes and exceeds the target by 86 units.

National Policy Objective 34 states: “*Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time*”. Studios and one-bedroom apartments do not constitute “*lifetime adaptable homes*” although they have a role to play in the national housing crisis and the national development plan they need to be located in the correct area. Such accommodation is best suited to real urban centers within close proximity to employment hubs, services and public transport if required. The Red Forge site is a 114 build to rent development which promotes speculators. The future

inhabitants of these dwellings will be migratory/seasonal and the opposite to those of the Old Whitechurch Road where people have tended to reside for decades.

I object to the proposed development by Cork County GAA Boards because of the environmental impact it will have on the Old Whitechurch Road:

In the first two points I detailed the increase in traffic volumes which the AADT predicts for the area this will inevitably lead to both noise and air pollution. This contravenes the Cork City Development Plan's Strategic Objective (SO) 8 *Environmental Infrastructure* and most notably "*Improve air quality and promote pro-active management of noise*". A 329% increase in traffic will lead to greater air and noise pollution even if government targets in relation to electric vehicles are achieved.

The EIAR notes there is no history of flooding at the site and the proposed development site lies within the Fluvial Flood Zone C – low flood risk. However, the EIAR also notes the *There have been instances of recurring flooding further downstream of the River Bride in Blackpool village. Floodmaps.ie has records of flooding in Blackpool as recently as 2012. The source of the flooding at Blackpool is from the river Bride. Blackpool Village lies within Flood Zone A – high flood Risk. Due to the existing risk of flooding downstream at Blackpool, it is essential that surface runoff to the river Bride is not increased as a result of the proposed development.* To mitigate for this risk to flooding downstream "*the Scheme will include construction of new culverts, replacement of existing bridges and culverts, construction of new flood walls/earthen embankments, local channel widening and maintenance of the river channel.*"

(EIAR). In certain areas the scheme will be unable to widen the river channel because it plans to build the park here and the lands do not belong to the scheme. Plus, the lands adjoining the river are natural flood plains, flooding seasonally. Ultimately surface runoff will be released into the Glennamought Tributary (Bride) river to the NW of the development. Detrimental to this, the LIHAF development is directly downstream of the GAA grounds development and releases its runoff to the Glennamought Tributary

also. This will increase the likelihood of flooding at the North Point Business Center, Blackpool Retail Center and Blackpool Village.

An article in the Cork Examiner dated Thursday 15/07/2004 aptly describes the grounds adjacent to Delaney Hurling and Football Ground as spoil material. Both the City Council and County Council came under fire from Margot Walstrom the then European Minister for the Environment for allowing illegal dumping of spoil material on the land adjacent to the pitch. It was reported that 350,000 tons of spoil material composed of earth, boulders and gravel waste from the construction of the Blackpool bypass was illegally disposed of at the location. The County Council was tasked with the cleanup operation which should have involved regrading of the embankments and any hazardous material disposed of at a licensed site. The cleanup operation was never performed, and the material illegally disposed of over 20 years ago is still visible today as evident from Figure 13 below. There is also evidence of more recent waste material being dumped on the site including ceramic material. The EIAR reports "*Where it is contemplated that a significant volume of soil/fill material will require excavation and transfer from the site, additional sampling and analysis shall be required over the course of development works*" the apartment blocks and four-bedroom detached dwellings are planned to be built on this debris. This area of the site is two to three meters higher than the ground to the south of the site and is planned to be built on during phase three of the construction phase of the planned scheme. The EIAR states it will perform more sampling if required but from the development scheme layout it is already apparent sampling is required because they plan to build here. No test boreholes were made in this location for reasons not included in the EIAR. In the event additional sampling is performed, and hazardous material is found it will be too late to mitigate because the first two phases of the scheme will be underway or complete and may have inhabitants. This is an unnecessary risk to the health and safety of both workers and residents.



Figure 13 Visible spoil material illegally dumped at Cork Council GAA ground adjacent to Delaney GGA Club

Hence, I object to the development on environmental grounds because of the negative cumulative effect it will have with the LIHAF development regards flood risk, air and noise pollution and insufficient sampling of the illegally dumped material on the site.

Finally, this development is seen by many as merely an exercise by the Cork GAA Board to service its debt of 29.74 million Euro for the construction of Parcaí Caiomh. (<https://www.corkbeo.ie/news/local-news/cork-gaa-seeks-permission-fastrack-24373051>). There is little or no regard for the residents of the locality and the ploy to fast track the development through Bord Pleanála via the guise of a National Strategic Housing Development is merely a route to avoid the proper planning channels which historically prevented the development of these lands.

In summation I believe I have made some valid points which warrant consideration before the Board makes its final decision.