



**COAKLEY O'NEILL**  
town planning

# Statement of Consistency

Cork GAA Lands, Old Whitechurch Road  
Kilbarry, Cork

Prepared in June 2022 on behalf of  
**CORK COUNTY GAA BOARD**

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## Document Control Sheet

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## 1.0 INTRODUCTION

- 1.1 We, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Co. Cork, have been instructed by our clients, the Cork County GAA Board, to prepare this Statement of Consistency to accompany an application to An Bord Pleanála for a Strategic Housing Development, as enacted under the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, at Kilbarry, Cork.
- 1.2 This Statement of Consistency sets out how, in our opinion, the proposed scheme complies with the proper planning and development of this area in the context of the relevant national and regional strategic and local planning policy.

## 2.0 SITE CONTEXT AND DESCRIPTION

- 2.1 The subject site is located to the northeast of Cork City Centre, and measures c. 15.52ha in area. The lands comprise open fields under grass, scrub, and gorse with established boundaries. An old hurling manufacturing factory lies derelict at the western end of the site.
- 2.2 The lands are bounded to their north by the Glenamought/ Bride River and Valley. Here, the lands slopes steeply down to the river and informal walking paths are evident. To the east, the lands are bounded by the grounds of Delaney Rovers GAA Club.
- 2.3 A roadway running between the GAA club and the Old Whitechurch Road (which abuts the western site boundary) forms part of the subject site. Further to the south, and to the southeast beyond the GAA grounds, lie IDA employment lands within the Kilbarry Business and Technology Park. Cork City Council's Whitechurch LIHAF development lands are to the immediate southwest of the site.



Figure 1. Subject site (generally outlined in red) in its local context. (Base image source: OSI; Annotated by Coakley O'Neill Town Planning, 2022).

### 3.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

3.1 The key provisions of national and regional planning policy as they relate to the proposed development are set out in the following sections. The principal guiding national, and regional policy documents are listed below:

- Project Ireland 2040 - National Planning Framework (2018);
- Housing for All - a New Housing Plan for Ireland' (2021);
- Regional and Spatial Strategy for the Southern Region (2020);
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
- Sustainable Urban Housing Design Standards for New Apartments (2020);
- Urban Design Manual – A Best Practice Guide;
- Delivering Homes, Sustaining Communities (2008), and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
- Quality Housing for Sustainable Communities (2007);
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- The Planning System and Flood Risk Management (2009);
- Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009); and
- Climate Action Plan (2021).

### 3.2 Project Ireland 2040 – National Planning Framework

3.2.1 The National Planning Framework (NPF), which forms part of Project Ireland 2040, is the national level statutory plan guiding land use and sustainable development in Ireland for the next two decades (Department of Housing, Local Government and Heritage, 2020).

3.2.2 One of the key future growth enablers for Cork outlined within the NPF includes progressing the sustainable development of new greenfield areas for housing. In this regard, the proposed development can be understood as contributing towards the future growth of Cork City in line with the targets for such contained in the NPF.

3.2.3 National Strategic Outcome (NSO) 1 “Compact Growth” of the NPF is aimed at consolidating and densifying future urban growth and development within existing settlements and their built-up footprints. It is submitted that the proposed development is consistent with this NSO in that it will deliver a new high-density residential development on a site located within the development boundary of Cork City.

3.2.4 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 modal shift towards greater levels of walking and cycling as transport mode

choices. It is submitted that the proposed development is consistent with this NSO in that it includes the provision of onsite shared cycle/ footpaths. Pedestrian/ cycle permeability has also been designed throughout the site layout on designated off-road routes.

3.2.5 NSO 7 “Enhanced Amenity and Heritage” is focussed on enhancing recreational spaces and attractiveness in city and town centres to support a good quality of life. Well-designed public realm, which includes public spaces, parks and streets, and recreational infrastructure are key to achieving this NSO. It is submitted that the proposed development is consistent with this NSO in that it proposes the provision, in the north of the site, of a new riverside public amenity park of 4.4ha, for the benefit of existing and future residents in the area. In addition, the proposal also includes pocket parks with kickabout and outdoor gym areas.

3.2.6 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. It is submitted that the proposed development is consistent with this NSO in that it includes the provision of a new 519m<sup>2</sup> childcare facility in the southwestern part of the site that will have capacity to accommodate 71no. children.

3.2.7 National Policy Objective (NPO) 3a is as follows:

*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

It is submitted that the proposed development is consistent with this NPO in that the proposal is to provide 319no. new homes within the existing settlement of Cork City.

3.2.8 NPO 6 is as follows:

*Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

It is submitted that the proposed development is consistent with this NPO in that it will regenerate the site of a disused hurley factory in the Kilbarry area of Cork City and will support the creation of a new city neighbourhood on site benefitting from permeability being designed into the site layout and with access to high quality public open space provision on site.

3.2.9 National Policy Objective 11 is as follows:

*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.*

It is submitted that the proposed development is consistent with this NPO in that it will stimulate significant additional levels of social/ community activity in the local area by increasing the local population by c. 877 people<sup>1</sup>. The increase in population is also anticipated to stimulate increased levels of economic activity.

3.2.10 National Policy Objective 27 is as follows:

*Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.*

As per the submitted proposed development's consistency with NSO 4 above, the proposed development includes the provision of onsite shared cycle/ footpaths as well as pedestrian and cyclist permeability throughout the site layout design.

3.2.11 National Policy Objective 28 states:

*Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.*

It is submitted that the proposed development is consistent with this NPO in that it:

- has been designed in accordance with Universal Design principles (please refer to the Universal Design Statement prepared by DMN Architects and submitted as part of the planning application);
- will accommodate a wide range of household types and sizes owing to the proposed mix of unit types and sizes – this will ensure a mixed and diverse community will be resident on site in the future.
- will support social interaction and the building of social solidarity for local residents through the provision of extensive open space onsite, providing multiple opportunities for people to meet and interact outdoors.

3.2.12 National Policy Objective is as follows:

*To target the delivery of 550,000 additional households to 2040*

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<sup>1</sup> Based on CSO data that the national average household size is 2.75 persons.

The proposed development, in delivering 319no. new homes on the northern side of Cork City, is clearly consistent with this NSO.

3.2.13 National Policy Objective 33 is as follows:

*Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

It is submitted that the proposed development of 319no. new homes and a new riverside amenity park, on a site with a total area of c. 15.52ha, will support the sustainable development of the Kilbarry area on the north side of Cork City. Owing to its scale, the proposed development may contribute towards the rebalancing of the social and economic disparities between the northern and southern suburbs of Cork City.

3.2.14 National Policy Objective 34 states:

*Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.*

As per the Universal Design Statement which has been submitted as part of the planning application, the proposed development has been designed to be an equitable, safe, readable, easy-to-get-around place where the homes themselves have been designed to adapt to residents changing needs during the life cycle.

3.2.15 The proposed development, located within the city boundary, and within the North Environs of the City, is in compliance with the aforementioned policy objectives set out in the National Planning Framework.

3.2.16 In summary the NPF shows broad policy support for the development as proposed in an existing settlement area which avoids further sprawl and ensures efficient use of zoned and serviced land.

### **3.3 Housing for All - a New Housing Plan for Ireland' 2021**

3.3.1 In September 2021, the Government launched 'Housing for All - a New Housing Plan for Ireland' which targeted solutions to the ongoing supply issues in the residential sector in the country. It is the Government's housing plan to 2030.

3.3.2 It is a multi-annual, multi-billion-euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs. The Government's overall objective is that every citizen in the State should have access to good quality homes:

- *to purchase or rent at an affordable price*
- *built to a high standard and in the right place*
- *offering a high quality of life.*



3.3.3 Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the NPF. These homes need to be affordable, built in the right place, to the right standard and in support of climate action. They need to satisfy demand for housing across four tenures – affordable, social, private rental and private ownership. They need to be advanced through the planning process and be built within the context of specific development targets for the five cities and major towns, and the complementary objectives of the Town Centre First policy and rural housing.

3.3.4 Housing for All provides four pathways to achieving four overarching objectives:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply;* and
- *Addressing Vacancy and Efficient Use of Existing Stock.*



Figure 2. The four pathways under the Housing for All plan. (Source: *Housing for All*, 2021).

3.3.5 The Actions proposed under each of these four pathways can be summarised as follows;

- ***Pathway 1 – Supporting Homeownership and Increasing Affordability;***
  - *Increased supply of new housing, up to an average of at least 33,000 per year to 2030*



- *An average of 6,000 affordable homes to be made available every year for purchase or for rent by Local Authorities, AHBs, the LDA and via a strategic partnership between the State and retail banks.*
- *A new, nationally available, affordable purchase shared-equity First Home scheme until 2025 for buyers of new-build homes in private developments*
- **Pathway 2 – Pathway to Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion**
  - *Provide more than 10,000 social homes each year, with an average 9,500 newbuild Social Housing Homes to 2026.*
  - *Through an updated 'Housing First National Implementation Plan', provide 1,200 tenancies over the next five years for people with a history of rough sleeping, or long-term use of emergency accommodation and who have complex needs.*
  - *Provide continued capital funding for housing for specific vulnerable cohorts, such as housing for older people and people with a disability, through the Capital Assistance Scheme and other social housing schemes.*
- **Pathway 3 – Pathway to Increasing New Housing Supply**
  - *Over 10,000 social homes and 6,000 affordable homes for purchase or rent per annum.*
  - *In accordance with the National Planning Framework, focus on adequate supply of serviced zoned lands to meet housing need, at required density.*
  - *Establish Urban Development Zones, which will provide a coordinated, plan-led approach to the delivery of residential and urban development.*
  - *Overhaul and simplify planning legislation to ensure certainty and stability.*
- **Pillar 4 – Pathway to Addressing Vacancy and Efficient Use of Existing Stock**
  - *A new Croí Cónaithe (Towns) Fund for servicing sites for new homes in regional towns and villages and to support refurbishment of vacant houses. Public infrastructure agencies, such as Irish Water, and local communities will work to provide serviced sites for housing. This will help attract people to build their own homes and live in small towns and villages.*
  - *Support for Local Authorities to purchase and resell up to 2,500 of the identified vacant properties in their areas. Compulsory Purchase Order (CPO) powers will be used where necessary. Local Authorities will be supported by Housing Finance Agency funding.*
  - *Incentivize the refurbishment and extension of vacant properties in towns or villages, for example, through energy retrofit supports and the Urban Regeneration Development Fund (URDF) / Rural regeneration Development Fund (RRDF) and other mechanisms.*

3.3.6 It is considered that the subject development, which proposes 319no. residential units contributes directly to Pathways no. 1, 2 and 3. In addition, it is considered that the provision of additional housing in the northern suburbs of Cork City will also improve the overall rental sector in the City's North Environs. Furthermore, the increase in housing supply in Kilbarry is anticipated to have a positive impact on the affordability of the area.

3.3.7 64 no. units are to be transferred to Cork City Council in order to meet the proposed development's Part V obligations. This will also contribute to the core objective of the Housing for All plan, which aims to accelerate social housing, as well as Pathway no. 2, which addresses homelessness through the delivery of additional social housing stock. The additional social homes in the area will alleviate some of the housing and homelessness issues ongoing across Cork City. It is therefore considered that the proposed development is fully compliant with and supportive of the Government's Housing for All action plan and is representative of sustainable development.

### 3.4 Regional Spatial and Economic Strategy for the Southern Region

3.4.1 The RSES for the Southern Region was published in January 2020 and provides the framework through which the vision of the NPF will be delivered for the region.

3.4.2 Table 3.1 of the RSES outlines the settlement typology for the region, and metropolitan areas, such as the Cork Metropolitan Area where the subject site is located, are identified in the first tier of the typology.

3.4.3 It is further noted that a key component of the strategy is to strengthen the settlement structure of the region and to capitalise on the individual and collective strength of the three cities, metropolitan areas, and strong network of towns. It is considered that the proposed development, which is located within the northern suburbs of Cork City, will aid in strengthening the overall settlement structure of the region.

3.4.4 On this basis, Strategy Statement No. 1 of the RSES is as follows:

*Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our 3 cities as a counterbalance to the Greater Dublin Area, through quality development, regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas.*

3.4.5 The proposed development will deliver 319 no. residential units within the City boundary, therefore increasing the population of the Cork Metropolitan Area and, consequently, will help to achieve Strategy Statement no. 1 of the RSES.

3.4.6 The RSES also include 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 and residential and enterprise development, providing a northern gateway to the City from the Limerick Road. It is noted that the potential residential yield envisaged for this area under the RSES is 950 no. units.

3.4.7 It is therefore considered that the proposed development, which seeks to provide 319 no. residential units on a residentially zoned site in the North Environs of Cork City, is consistent with the RSES and the Cork MASP, and will contribute towards achieving the aims of both.

### 3.5 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

3.5.1 The role of these Guidelines is to ensure the sustainable delivery of new development by:

- Prioritising walking, cycling and public transport, and minimise car usage;
- Providing ease-of-access for all users and to facilitate finding one's way around;
- Promoting the efficient use of land and of energy, and minimising greenhouse gas emissions;
- Providing a mix of land uses to minimise transport demand; and
- Reducing traffic speeds in housing developments.

3.5.2 The Guidelines set out the core principles of urban design to create places of high quality and distinct identity. In this regard, the Guidelines are accompanied by a Design Manual, which demonstrates how design principles can be applied in the design and layout of a new residential development at various scales and in various settings.

3.5.3 Cities and larger towns are identified as the focus for population growth in the Country. Within the guidelines, cities and larger towns are defined as those with a population of over 5,000 people.

3.5.4 The Guidelines take a plan-led approach to development of residential areas, with Section 2.1 of the Guidelines noting the following:

*The scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy.*

3.5.5 As set out in the Guidelines, new development in cities or larger towns should be appropriate to its context as outlined in Section 5.1 as follows:

*The objective should be the achievement of an efficient use of land appropriate to its context, while avoiding the problems of over-development.*

3.5.6 The Guidelines also set out appropriate locations where densities of 35+ units per hectare are appropriate. Section 5.11 of the Guidelines note that the following is considered appropriate on outer suburban sites:

*...the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.*

3.5.7 As stated previously, the subject site is located within the extended Cork City boundary, as of May 2019. Therefore, the site must be assessed under the cities or larger towns section of these Guidelines.

- 3.5.8 The site is considered to be an outer suburban site, where net residential densities in the 35+ units per hectare range are considered appropriate.
- 3.5.9 The gross area of the subject site is c.15.52ha, while the net developable area of the subject site is stated to be 8.229ha. On this basis, and considering that 319no. units are proposed, the corresponding density is 38.77units/ha. This is in keeping with Section 5.11 of the Guidelines, which notes that densities of between 35 and 50 units per hectare are considered appropriate in locations such as the site of the proposed development.
- 3.5.10 Furthermore, the proposed development consists of a mix of different residential types, including apartments, duplexes, terraces, and semi-detached dwellings, catering for a variety of different household types and sizes.

### 3.6 Sustainable Urban Housing Design Standards for New Apartments (2020)

- 3.6.1 The 2020 Apartment Guidelines contain design quality safeguards such as internal space standards for 1-2- and 3-bedroom apartments, and internal storage and amenity space requirements.
- 3.6.2 These Guidelines set out a series of design standards which new apartments must comply with, and these are outlined in Table 1 below. The quantitative details of the proposed development are set out in Table 2. The guidelines also set out other more qualitative design standards, and these are addressed in Table 3 below.

Apartment Type	Minimum Gross Floor Area	Minimum Aggregate living /dining /kitchen	Minimum Aggregate Bedroom Area	Minimum Storage Area	Minimum Private Amenity Space
Studio	37	30		3	4
1 Bed Apartment	45	23	11.4	3	5
2 Bed (3 person)	63	28	20.1	5	6
2 Bed (4 person)	73	30	24.4	6	7
3 Bed	90	34	31.5	9	9

**Table 1: Quantitative Design Standards as set out in the Sustainable Urban Housing Design Standards for New Apartments (2020).**

Apartment Units Number	Internal Gross Floor Areas (sqm)	Aggregate living/dining/kitchen (sqm)	Aggregate Bedroom area (sqm)	Storage Area (sqm)	Private Amenity Space Area (sqm)
<b>1 (2 bed)</b>	79	31.5	24.5	6	15.7
<b>2 (1 bed)</b>	55.3	25.5	11.4	5.1	5
<b>3 (2 bed)</b>	80.7	30	25.3	6.7	37.2
<b>4 (2 bed)</b>	80.7	30	25.3	6.7	8.7

5 (2 bed)	79	31.4	24.5	6	8.9
6 (1 bed)	55.3	25.5	11.4	5.1	5
7 (2 bed)	80.7	30	25.3	6.7	17
8 (2 bed)	80.7	30	25.3	6.7	18.7
9 (2 bed)	80.7	30	25.3	6.7	8.7
10 (2 bed)	79	31.4	25.3	6.7	8.9
11 (1 bed)	55.3	25.5	11.4	5.1	5
12 (2 bed)	80.7	30	25.3	6.7	17
13 (2 bed)	80.7	30	25.3	6.7	6.3
14 (2 bed)	80.7	30	25.3	6.7	8.7
15 (2 bed)	79	31.4	24.5	6	8.9
16 (1 bed)	55.3	25.5	11.4	5.1	5
17 (2 bed)	80.7	30	25.3	6.7	17
18 (2 bed)	80.7	30	25.3	6.7	6.8
19 (2 bed)	80.7	30	25.3	6.7	8.7
20 (2 bed)	79	31.4	24.5	6	8.9
21 (1 bed)	51.8	23.8	11.4	3.4	5.2
<b>Duplex Block A Unit no.</b>					
1 (1 bed)	51.1	23.1	11.4	3	11.8
2 (1 bed)	51.1	23.1	11.4	3	11.9
3 (1 bed)	51.1	23.1	11.4	3	17.9
4 (1 bed)	51.1	23.1	11.4	3	17.9
5 (1 bed)	51.1	23.1	11.4	3	18.8
6 (1 bed)	51.1	23.1	11.4	3	19.6
7 (1 bed)	49.6	23	11.4	3.4	59.9
8 (1 bed)	50.5	23	11.4	3.4	23.5
9 (1 bed)	51.1	23.1	11.4	3	17.2
10 (1 bed)	51.1	23.1	11.4	3	18.1
11 (1 bed)	50.4	23.7	11.5	5	18.3
12 (2 bed)	115.2	33.5	29.9	15.1	7
13 (2 bed)	113.9	32.3	32.8	12.3	7
14 (2 bed)	107.8	32.3	29.7	12.3	7
15 (2 bed)	107.8	32.3	29.7	12.3	7
16 (2 bed)	107.8	32.3	29.7	12.3	7
17 (2 bed)	107.8	32.3	29.7	12.3	7
18 (3 bed)	126.5	35.2	32.5	9.1	9
19 (3 bed)	124.3	36.1	37.3	9.7	9
20 (2 bed)	107.8	32.3	29.7	12.3	7
21 (2 bed)	107.8	32.3	29.7	12.3	7
22 (2 bed)	117.9	34.8	29	8.4	7
<b>Duplex Block B Unit Number</b>					
23 (2 bed)	103.3	30.1	26.1	8.2	30.9
24 (2 bed)	103.3	30.1	26.1	8.2	25.4
25 (2 bed)	103.3	30.1	26.2	8.2	24.2
26 (2 bed)	97.8	31.4	25.2	8.4	16.7
27 (2 bed)	103.1	30.6	24.8	9	37.3
28 (1 bed)	53.2	23	11.4	3.1	6.7
29 (1 bed)	53.2	23	11.4	3.1	6.7
30 (1 bed)	53.2	23	11.4	3.1	6.7

<b>31 (1 bed)</b>	53.1	23	12.1	3	8.4
<b>Duplex Block C Unit Number</b>					
<b>32 (1 bed)</b>	48.2	23.7	11.5	3.1	13.2
<b>33 (1 bed)</b>	48.1	23.7	11.5	3	21.2
<b>34 (2 bed)</b>	55.2	34.2	35.6	8.4	7.5
<b>35 (2 bed)</b>	55.2	34.2	35.6	8.4	7.5
<b>36 (2 bed)</b>	55.2	34.2	35.6	8.4	7.5
<b>66 (1 bed)</b>	51.9	23.5	11.4	3	12.4
<b>67 (1 bed)</b>	51.9	23.5	11.4	3	7.8
<b>68 (1 bed)</b>	48.1	23.7	11.6	3	24.3
<b>69 (2 bed)</b>	93.1	30	25.3	6.1	8.6
<b>70 (2 bed)</b>	93.1	30	25.3	6.1	7.4
<b>Duplex Block D Unit Number</b>					
<b>71 (1 bed)</b>	50	23	11.9	3.4	39.6
<b>72 (1 bed)</b>	50	23	11.9	3.4	11.2
<b>73 (1 bed)</b>	48.1	23.6	11.4	3	14.7
<b>74 (1 bed)</b>	48.2	23.7	11.4	3.2	14.7
<b>75 (1 bed)</b>	48.1	23.7	11.5	3	15.2
<b>76 (1 bed)</b>	48.1	23.7	11.5	3	29.9
<b>77 (2 bed)</b>	93.1	30	25.3	6.1	8.6
<b>78 (2 bed)</b>	93.1	30	26.2	6	7.4
<b>79 (2 bed)</b>	110.4	34.2	35.6	8.9	7.3
<b>80 (2 bed)</b>	110.4	34.2	35.6	8.9	7.3
<b>81 (2 bed)</b>	104.1	34.2	27.9	8.9	7.3
<b>82 (2 bed)</b>	104.1	34.2	27.9	8.9	7.3

Table 2: Quantitative Standards of Proposed Units.

Requirement	Response
<p><b>Section 3.4 states that the following minimum floor areas for apartments:</b></p> <ul style="list-style-type: none"> <li>o 1-bed studio apartment = 37 sqm</li> <li>o 1-bed = 45 sqm</li> <li>o 2-bed (3 persons)** = 63sqm</li> <li>o 2-bed (4 persons)**= 73 sqm</li> <li>o 3-bed = 90 sqm</li> </ul> <p>**permissible in limited circumstances</p>	<p>All apartments within the development exceed the minimum floor areas for apartments</p>
<p><b>Section 3.12 also requires that in a scheme of 10 or more apartments, the majority of all apartments must exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3-bedroom unit types by a minimum of 10%.</b></p>	<p>All the proposed apartment units exceed the minimum floor areas standard for each apartment type</p>
<p><b>Section 3.17 requires:</b></p> <ul style="list-style-type: none"> <li>o <b>Minimum of 50% dual aspect apartments in urban locations</b></li> </ul>	<p>It is noted that only 12no. of the 116no. proposed apartment/ duplex units are single aspect.</p>

- **This may be reduced to 33% in certain circumstances where it is necessary to ensure good street frontage and subject to high quality design, usually on inner suburban sites, near to city or town centres, including SDZ areas**

**Section 3.14 requires that minimum ceiling heights accord with the Building Regulations (i.e. 2.4m). Ceiling heights at ground floor level should be greater than 2.7m**

**Section 3.21 requires that, subject to compliance with dual aspect ratios and the Building Regulations, up to 12 apartments per floor per individual stair/lift core may be provided within apartment schemes.**

**Section 3.30 states that provision should be made for storage and utility (additional to kitchen/bedroom furniture), specifically for household utility functions such as clothes washing and the storage of bulky personal or household items.**

**Section 3.35 requires that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. A minimum depth of 1.5m is required for balconies.**

**Section 3.28 states that apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas.**

**Section 4.1 requires apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations**

All of the apartments proposed achieve floor to ceiling heights of at least 2.7m.

All lift cores proposed comply with this standard.

Each apartment meets or exceeds the standards set out in the guidelines for storage space. In addition, as the internal floor areas generally exceed the minimum standards, it is considered that this will allow for the provision of additional storage as required by the occupant.

All apartments/ duplexes in the proposed development meet or exceed the minimum standards in terms of private amenity space.

All apartment and duplex units front onto the surrounding public realm, affording the space with passive surveillance and increasing the sense of safety in the area. The apartment duplex units overlook the main areas of open space, as well as parking areas. All entrance points are safe and secure, located at street level in order to ensure pedestrian activity is maximised.

As stated previously, pedestrian and cyclist accessibility are a primary consideration of the proposed



<p><b>Section 4.5 states that communal rooms may be provided in apartment schemes, including meeting rooms or management/maintenance offices, as well as childcare and gym uses that may be open to non-residents.</b></p> <p><b>Section 4.13 requires that the recreational needs of children must be considered as part of communal amenity space within apartment schemes.</b></p>	<p>development, forming the only access route through the whole development. The development has been designed to be universally accessible as standard. All access points access points will be Part M compliant. The variety of public open spaces have been designed to ensure that all members of the public, regardless of age or ability can access the spaces.</p> <p>Ample private amenity space, as well as public open space has been provided throughout the development. On this basis, specific communal rooms are not considered necessary in this context. However, a crèche facility has been provided as part of the development which offers an additional amenity for the occupants of the apartment/duplexes</p> <p>A comprehensive landscaping and public open space masterplan is submitted. It is noted that the recreational needs of children have been met through the provision of a recreational spine throughout the development including playgrounds and kick-about areas, as well as several cycling routes throughout the development</p>
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**Table 3: Consistency between the proposed development and the Sustainable Urban Housing Design Standards for New Apartments (2020).**

### 3.7 Urban Design Manual – A Best Practice Guide

3.7.1 This Guide is based around twelve criteria that have been drawn up to encapsulate the range of design considerations for residential development. They are, in essence, a distillation of current policy and guidance and tried and tested principles of good urban design.

3.7.2 It is noted that this section of the Statement of Consistency should be read in conjunction with the Architectural Design Statement prepared by DMN Architects and submitted as part of this SHD planning application to An Bord Pleanála. DMN's statement details the twelve design criteria, however a summary of the criteria as they relate to the proposed development is set out hereunder.

#### 3.7.3 **Context – How does the development respond to its surroundings?**

The proposed development has been designed to respond to the site's topographical context as well as providing boundary specific responses to surrounding boundary conditions. In this regard, the development has been designed to allow for the rear gardens of houses to front onto Delaney's GAA club, and the proposed distributor road to the south of the site creates a buffer between the residential uses on site and the industrial estate to the south.

3.7.4 Furthermore, the design of the proposed layout has ensured overlooking of the proposed public park. This has been achieved by creating a strong urban edge with the 3 no. apartment buildings proposed along the interface of the residential and open space zonings. In order to address the level changes in this area, the apartments have been stepped down a full level.

#### 3.7.5 **Connections – How well connected is the new neighbourhood?**

The subject site benefits from being located in an urban environment, located on the northern fringe of Cork City. Internally, it is considered that the proposed development is very well connected in terms of pedestrian, cycle, and vehicular routes, while a number of connections are proposed to existing and future development areas in the vicinity.

3.7.6 In this regard it is noted that the proposed distributor road located along the southern boundary of the site will include a combined footpath cycleway. This will allow for improved connections between Old Whitechurch Road and Delaney's GAA club lands.

3.7.7 In addition, the layout links to existing movement routes and the places people will want to get to. As part of the development a new public park is proposed along the northern boundary of the site and both pedestrian links and cycleways access this proposed park from the residential development. These paths also provide links to the adjacent IDA lands and to a future riverside walk heading west towards the Mallow Road.

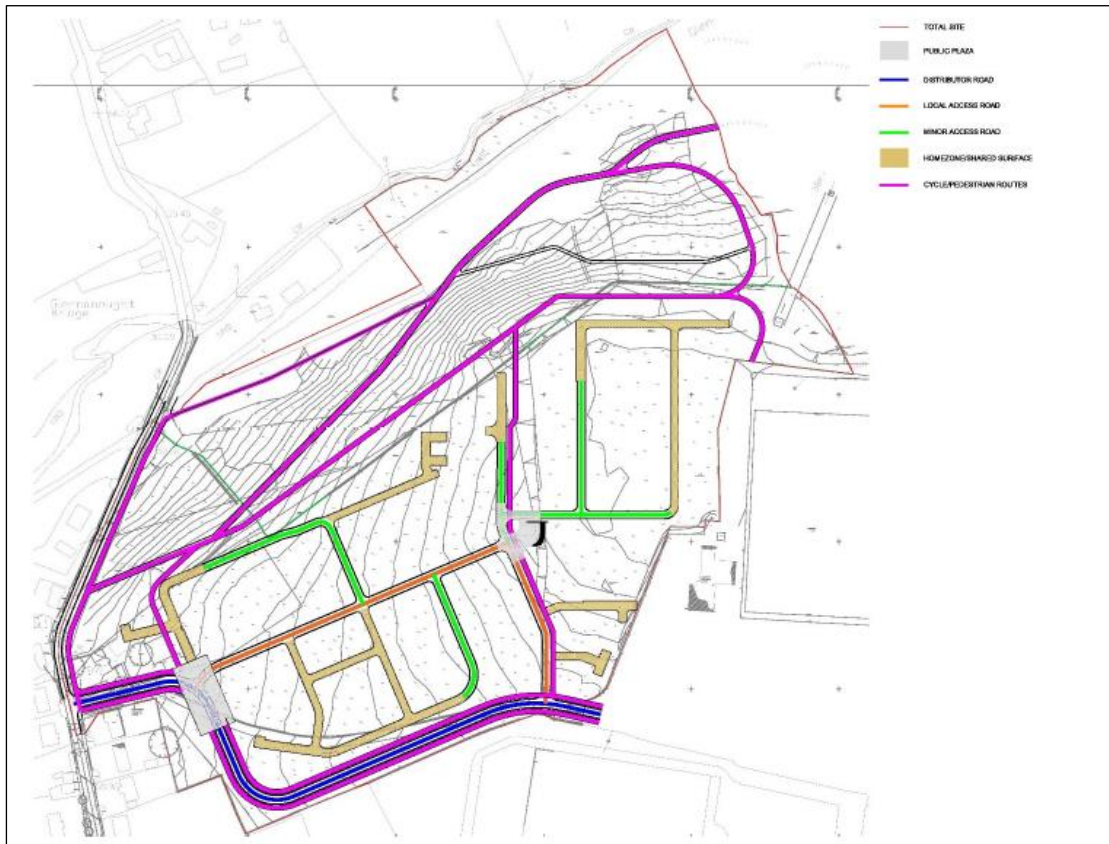


Figure 2: Map showing Road Hierarchy and proposed pedestrian and cycleways

3.7.8 **Inclusivity - How easily can people use and access the development?**

The proposed development has been designed to allow a range of different house types, ranging from semi-detached 4-bed units to 1-bed apartment units. This will meet the aspirations of a range of people and households, creating a mixed neighbourhood, capable of supporting a variety of people through all stages of their lives.

3.7.9 The scheme itself provides a wide range of public, communal, and private amenity spaces and facilities for children of different ages, parents and the elderly. For example, a playground has been included to cater for younger children, a kickabout area for older children, a playground, and an outdoor gym for adults and elderly people. All open spaces have been designed to be easily accessible by all.

3.7.10 **Variety – How does the development promote a good mix of activities?**

The proposed development connects to and is part of the wider urban environment which includes a range of housing types and community and sports facilities. The range of accommodation proposed within the development broadens the range of choice available in the area at present, through the provision of a mix of 1, 2 & 3 bed apartments and duplexes, and 2, 3 and 4 bed housing. The surrounding area is currently characterised by single detached dwellings. In this regard, therefore, the variety of housing types proposed will help meet different housing needs in the vicinity in a more sustainable development pattern.

- 3.7.11 It is noted that the proposed development includes the provision of a 71no. place crèche, with dedicated drop-off point for use by residents as well as those residing in the vicinity of the site. Furthermore, it is noted that the development includes the provision of a large public park with a significant number of paths and cycleways.
- 3.7.12 In this regard, it is submitted that the proposed development will provide a mix of residential, commercial and recreational activities, which will contribute to the quality of life in the locality of the site, to the benefit of future residents as well as those already living in the area.
- 3.7.13 **Efficiency – How does the development make appropriate use of resources, including land?**  
It is considered that the subject site responds positively to its context, neighbouring uses and the topographical nature of the subject site.
- 3.7.14 All houses, apartments and duplex units on the site have been designed to maximise solar gain, while minimising the number of north facing rear gardens. In addition, wide fronted houses have also been designed so that habitable rooms are south facing to maximise solar gains.
- 3.7.15 **Distinctiveness – How do the proposals create a sense of place?**  
The proposed development has been designed with a number of recognisable features to create a sense of place and to allow people to easily describe where they live, forming an emotional attachment to the neighbourhood.
- 3.7.16 In this regard, the entrance from Old Whitechurch Road has been designed as a focal point formed by the three duplex apartment blocks and the crèche. This creates a sense of enclosure and arrival into the development.
- 3.7.17 A further node is created at the location where the two local access roads meet. Here a public open space with tiered seating to provide an external performance space is created adjacent to a large area of open space.
- 3.7.18 It is further considered that the provision of the proposed public park as part of the proposed development, with several pedestrian and cycleways travelling from the development to the park will also help to distinguish it from other developments in the vicinity.
- 3.7.19 **Layout – How does the proposal create people friendly streets and spaces?**  
The streets of the proposed development are designed in the first place as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers, with traffic speeds controlled by design and layout rather than by speed humps
- 3.7.20 Furthermore, and in accordance with the Design Manual for Urban Roads and Streets, the proposed layout sets out a clear hierarchy of roads. Dedicated pedestrian and cycling facilities are being provided throughout the site, linking different areas of the development as well as neighbouring sites and facilities.

3.7.21 **Public Realm – How safe, secure and enjoyable are the public areas?**

The proposed development is set around a network of pathways, streets and open spaces that are of high quality and provide an attractive public realm for both future residents and visitors to the site. The public realm is considered as a usable integrated element in the design of the development.

3.7.22 All public open spaces benefit from being overlooked by surrounding homes to give a sense of ownership to future residents of the site as well as ensuring passive surveillance. In order to ensure that open spaces are pedestrian friendly, all roads surrounding open spaces are pedestrian priority shared spaces to allow easy access from the homes in the development.

3.7.23 A proposed playground is located centrally within the scheme immediately off one of the proposed cycle routes and overlooked by adjacent houses and apartments. The playground is also set within a larger landscaped space creating a safer environment for children, with a landscape buffer to adjacent roads and parking areas.

3.7.24 **Adaptability – How will the buildings cope with change?**

All the proposed units in the development have been designed in accordance with the “Quality Housing for Sustainable Communities” guidance. The proposed housing units have the ability to be extended into the rear garden of properties.

3.7.25 All homes are energy-efficient and are designed to be equipped for challenges anticipated from a changing climate. Furthermore, the structure of the proposed houses and its loose fit design allows for adaptation and subdivision, such as the creation of an annexe of small office space in the roof which can be easily converted into additional living accommodation.

3.7.26 **Privacy and Amenity - How does the scheme provide a decent standard of amenity?**

Each home has access to an area of high quality useable private outdoor space. The layout maximises the number of homes enjoying dual aspect and as many houses as possible having either south, west or east facing rear gardens. Homes are designed to prevent sound transmission by appropriate acoustic insulation and also by the layout of the units.

3.7.27 Instances of overlooking of private spaces have been minimised by avoiding siting windows with views into other homes. Private amenity and storage spaces for the proposed apartment units meet the Sustainable Urban Housing, Design Standards for New Apartments (2020). In addition, storage for recyclables and bins is incorporated into the design of apartment and duplex units.

3.7.28 **Parking – How will the parking be secure and attractive?**

The car parking layout has been designed so that parking is within easy reach of the home’s front door. Parking has been provided with over 71% of units being provided with communal parking. In terms of the allocation of parking spaces, it is noted that 2 no. spaces are provided per each house. In this regard, the efficiency of parking will be maximised, as well as being capable of accommodating visitors without the provision of dedicated visitor car parking.

- 3.7.29 The materials utilised for the provision of car parking spaces will be of a similar quality to the rest of the development with significant soft landscaping to reduce the visual impact of parked cars on the development.
- 3.7.30 In addition, secure facilities have been provided for bicycle parking with all duplexes benefiting from having shared bike parking areas, located in communal semi-private courtyards to the rear of the units. Furthermore, apartments have internal bike storage areas incorporated into the basement level.
- 3.7.31 **Detailed Design - How well thought through is the building and landscape design?**  
The materials and external design of the proposed housing within the development will make a positive contribution to the locality, with high quality materials and finishes proposed. The landscape design facilitates the use of the public spaces from the outset. Communal car parking areas are considered as an integral element within the public realm design and have been designed with generous landscape areas incorporated within the parking areas.
- 3.8 Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities.**
- 3.8.1 The Department's policy statement 'Delivering Homes, Sustaining Communities Guidance' provides the overarching policy framework for an integrated approach to housing and planning.
- 3.8.2 The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community.
- 3.8.3 The Delivering Homes, Sustaining Communities policy statement is accompanied by Best Practice Guidelines entitled '**Quality Housing for Sustainable Communities**'. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes.
- 3.8.4 The Guidelines relate primarily, but not exclusively, to housing accommodation for individual households, ranging from single person to large family households. They do not purport to be comprehensive nor seek to prescribe design solutions. They are intended to assist designers but proper design input on each project remains essential.
- 3.8.5 Of particular importance within these guidelines is Table 5.1, which outlines the standards for space provision and room sizes for typical dwellings as follows;

Dwelling Type	Target Gross Floor Area (m <sup>2</sup> )	Minimum Main Living Room (m <sup>2</sup> )	Target Aggregate Living Area (m <sup>2</sup> )	Target Aggregate Bedroom Area (m <sup>2</sup> )	Target Storage (m <sup>2</sup> )
4Bed/7P House (3 storey)	120	15	40	43	6
4Bed/7P House (2 storey)	110	15	40	43	6
4Bed/7P House (1 storey)	100	15	40	43	6
4Bed/7P Apartment	105	15	40	43	11
3 bed/6P House (3 storey)	110	15	37	36	6
3 bed/6P House (2 storey)	100	15	37	36	6
3 bed/6P House (1 storey)	90	15	37	36	6
3 bed/6P Apartment	84	15	37	36	10
3 bed/5P House (3 storey)	102	13	34	32	5
3 bed/5P House (2 storey)	92	13	34	32	5
3 bed/5P House (1 storey)	82	13	34	32	5
3 bed/5P Apartment	86	13	34	32	9
3 bed/4P House (2 storey)	83	13	30	28	4
3 bed/4P House (1 storey)	73	13	30	28	4
3 bed/4P Apartment	76	13	30	28	7
2 bed/4P House (2 storey)	80	13	30	25	4
2 bed/4P House (1 storey)	70	13	30	25	4
2 bed/4P Apartment	73	13	30	25	7
2 bed/3P House (2 storey)	70	13	28	20	3
2 bed/3P House (1 storey)	60	13	28	20	3
2 bed/3P Apartment	63	13	28	20	5
1 bed/2P House (1 storey)	44	11	23	11	2
1 bed/2P Apartment	45	11	23	11	3

**Table 4: Extract from Table 5.1, Quality Housing for Sustainable Communities**



Dwelling Type	Dwelling Type	Achieved Gross Floor Area (m <sup>2</sup> )	Achieved Aggregate Living Area (m <sup>2</sup> )	Achieved Aggregate Bedroom Area (m <sup>2</sup> )	Achieved Storage (m <sup>2</sup> )
<b>A</b>	4 bed/7P House (2 storey)	146.6	43.7	51.1	9.7
<b>A1</b>	4 bed/7P House (2 storey)	146.6	43.7	51.1	9.7
<b>B</b>	4 Bed/7p House (2 storey)	148.5	45.5	49.4	8.1
<b>C</b>	4 Bed/7p House (2 storey)	137.7	54.1	45.2	6
<b>C1</b>	4 Bed/7p House (2 storey)	149.5	60.2	48.1	9
<b>D</b>	3 Bed/5p House (2 storey)	114.8	39.4	39.1	5
<b>E</b>	3 Bed/5p House (2 storey)	114.5	42.7	33.2	6.7
<b>E1</b>	3 Bed/5p House (2 storey)	114.5	42.7	33.2	6.7
<b>E2</b>	3 Bed/5p House (2 storey)	114.5	42.7	33.2	6.7
<b>F</b>	3 Bed/5p House (2 storey)	113	43	35.5	6
<b>F1</b>	3 Bed/5p House (2 storey)	113	43	35.5	6
<b>F2</b>	3 bed/5p House (2 storey)	113	43	35.5	6
<b>G</b>	3 Bed/5p House (2 storey)	112.1	42.8	34.5	7
<b>H</b>	2 Bed/4p House (2 storey)	83.7	32.8	25.5	4
<b>J</b>	3 Bed/5p House (2 storey)	114.5	45.5	32.2	5.3

**Table 5. Proposed Development's Compliance with Table 5.1, Quality Housing for Sustainable Communities**

- 3.8.6 Table 4 above outlines the qualitative standards as they relate to the residential units in the subject development, and it is confirmed that all units comply with Table 5.1 of the Quality Housing for Sustainable Communities Guidelines (Table 5 above).
- 3.8.7 Having regard to Table 5 above, it is submitted that the proposed development meets and exceeds the space provision and room size standards as set out in the "Best Practice Guidelines- Quality Housing for Sustainable Communities".

### **3.9 Design Manual for Urban Roads and Streets**

3.9.1 To effectively communicate how the principles, approaches and standards within this Manual have been applied, it is recommended that all proposed developments, regardless of scale, are accompanied by documentation that provides a clear rationale for the project, such as within a design statement.

3.9.2 To ensure that street layout plans communicate a complete picture of the design, it is recommended that the following information be presented, as appropriate:

- The width of streets, footways, verges, medians and privacy strips.
- The location, type and configuration of crossings and junctions.
- Corner radii (including swept paths).
- On-street parking.
- Horizontal and vertical alignment data.
- Horizontal and vertical deflections.
- Forward visibility splays.
- Kerb lines (including heights).
- Surface Materials and Planting.
- Street furniture and facilities.
- Signage and Line Marking.
- Lighting.

3.9.3 Design teams and planning authorities will need to balance the level of detail given at any stage of the design/consent process. For example, more technical specifications may be better suited to later compliance submissions so that the initial consent process is not overly burdened with detail.

3.9.4 On this basis, a Statement of Compliance with the Design Manual for Urban Roads and Streets (DMURS) has been prepared and submitted by DMN Architects and is submitted as part of this SHD planning application.

3.9.5 The submitted DMURS Compliance Statement details how the proposed development has a clear hierarchy of streets, is highly permeable, has been designed to support wayfinding and provides a safe environment for pedestrians and cyclists. Please refer to the submitted DMURS Compliance Statement for further details.

### **3.10 Guidelines for Planning Authorities on Childcare Facilities (2001)**

3.10.1 Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed.

3.10.2 On the basis of these guidelines, a crèche has been provided as part of this application. The crèche will have capacity for 71 no. childcare spaces. In this regard, a Childcare Needs Assessment has been prepared and is submitted with this SHD planning application, justifying the provision of a 71no. space crèche as part of the proposed development.

### 3.11 Smarter Travel – A New Transport Policy for Ireland (2009-2020)

3.11.1 The Smarter Travel Policy reaffirms the vision for sustainability in transport and sets out five key goals:

- to reduce overall travel demand
- to maximise the efficiency of the transport network
- to reduce reliance on fossil fuels
- to reduce transport emissions and
- to improve accessibility to transport.

3.11.2 One of the targets set out in the policy document to achieve these sustainable transport and travel goals by 2020 is outlined as follows:

*Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services*

3.11.3 It is submitted that the proposed development, located within the development boundary, within walking distance to a range of facilities and services located at Blackpool, in addition to being located within 750m of a regular bus service, will help to achieve this target.

### 3.12 The Planning System and Flood Risk Management (2009)

3.12.1 The Guidelines provide “mechanisms for the incorporation of flood risk identification, assessment and management into the planning process...”. They ensure a consistent approach throughout the country requiring identification of flood risk and flood risk assessment to be key considerations when preparing development plans, local area plans and planned development. The core objectives of these Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding
- Avoid new developments increasing flood risk elsewhere
- Ensure effective management of residual risks for development permitted in floodplains
- Avoid unnecessary restriction of national, regional or local economic and social growth
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure the requirements of EU and national law in relation to the natural environment and nature conservation are complied with for flood risk management.

3.12.2 A Flood Risk Assessment has been prepared by JB Barry and is submitted with this SHD planning application.

### **3.13 Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)**

- 3.13.1 Under Article 6 (3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 "European Communities (Natural Habitats) Regulations (1997)" any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. Special Area of Conservation (SAC) or Special Protection Area (SPA)) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 – 2010).
- 3.13.2 A Screening Report for Appropriate Assessment in respect of the proposed development, carried out by Doherty Environmental, has concluded that the potential for likely significant effects to European Sites cannot be ruled out at the Screening stage and that an Appropriate Assessment of the project is required.
- 3.13.3 Based on this conclusion, a Stage 2 Appropriate Assessment Natura Impact Assessment (NIS) has been prepared to inform the Board during its Appropriate Assessment of the proposed development and its potential to result in adverse effects to the integrity of the Cork Harbour SPA and the Great Island Channel SAC, alone or in-combination with other plans or projects. Both documents are submitted as part of this SHD planning application.
- 3.13.4 The NIS concludes that the proposed development will not, alone or in-combination with other plans or projects, result in significant adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific evidence, and there is no reasonable scientific doubt as to that conclusion

### **3.14 Climate Action Plan 2021**

- 3.14.1 The Climate Action Plan sets out Government policies that will support the achieving of a 51% reduction in overall greenhouse gas emissions by 2030, enabling Ireland to reach net-zero emissions by 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.
- 3.14.2 One of the targets of the Climate Action Plan aimed at meeting the required level of emissions reductions by 2030 is to fully implement the NPF.
- 3.14.3 Specifically, it is the NPF objectives and policies which the Climate Action Plan refers to as the means by which the spatial planning sector will contribute towards GHG emission reductions.
- 3.14.4 Achieving the objectives of the Climate Action Plan will thus be supported through:
- Reduced travel distances between home, work and services, which will enable a greater proportion of journeys by bicycle or on foot (zero emissions)
  - Greater urban density will ensure more viable public transport leading to reduced transport emissions

- Higher density residential development, which tends to comprise smaller units and, therefore, require less energy to heat – NPF targets require the proportion of apartments to treble, from 13% in 2019, to 39% by 2030
- Closer proximity of multi-storey and terraced buildings, which will require less energy and make renewables-based systems of energy distribution, such as district heating, or area-wide technology upgrades, more feasible

3.14.5 In addition, the proposed development will contribute towards the creation of a compact urban environment in the suburb of Kilbarry. The proposed development will have a positive impact on climate action by reason of being a high-density residential scheme that benefits from sustainable connectivity with the city centre and other hubs of employment, social, educational, and recreational importance in the area. It also proposes a riverside amenity park which in turn will promote a greener more sustainable development in the area.

3.14.6 In response to the above and in accordance with national, regional and local policy as well as best practice and the highest industry standards, the proposed development has been consciously designed to prioritise the reduction of greenhouse gas emissions (through encouraging modal shift) and the support of biodiversity (through the use of SuDS, retaining existing trees on site and through creating and retaining an area as a riverside amenity park).

#### 4.0 CONSISTENCY WITH LOCAL PLANNING POLICY

4.0.1 This section of the planning report provides an account of the relevant local planning policy documents and includes reference to the *Cork City Development Plan 2022-2028*. The initial stages of this SHD application were prepared in the context of the subject site being governed and regulated by the policies of both the *Cork County Development Plan, 2014* and the *Cobh Municipal District Local Area Plan, 2017*.<sup>2</sup>

4.0.3 Items 1 and 2 of the Board Opinion makes reference to these documents. However, since this opinion was published, the Cork City Development Plan 2022-2028 was adopted on the 27<sup>th</sup> June 2022<sup>3</sup>. It will come into effect in 6 weeks from this date and will form the basis of the Board's decision on this SHD application.

4.0.4 Notwithstanding the above, for consistency between the pre-application and application documents, compliance with key policies and objectives from the *Cork County Development Plan 2014* and the *Cobh Municipal District Local Area Plan 2017* is included in Appendix A of this report.

#### 4.1 Cork City Development Plan 2022-2028

4.1.1 When published in 2021, the Draft Cork City Development Plan had proposed to continue the current zoning regime for the lands as per the *Cobh Municipal District Local Area Plan, 2017*, namely:

<sup>2</sup> Policy provisions of both Cork County Development Plan, 2014 and Cobh Municipal District Plan, 2017 included as an Appendix here

<sup>3</sup> Note some of the paragraph, figure and objective numbers cited in this section may change slightly as the final adopted plan was not available at time of preparation.

- An Open Space to the North along the boundary to the river;
- A Residential zoning centrally;
- A Light Industry and Related Uses zoning to the south of the internal road; and
- A small area to the east to be zoned 'sports'

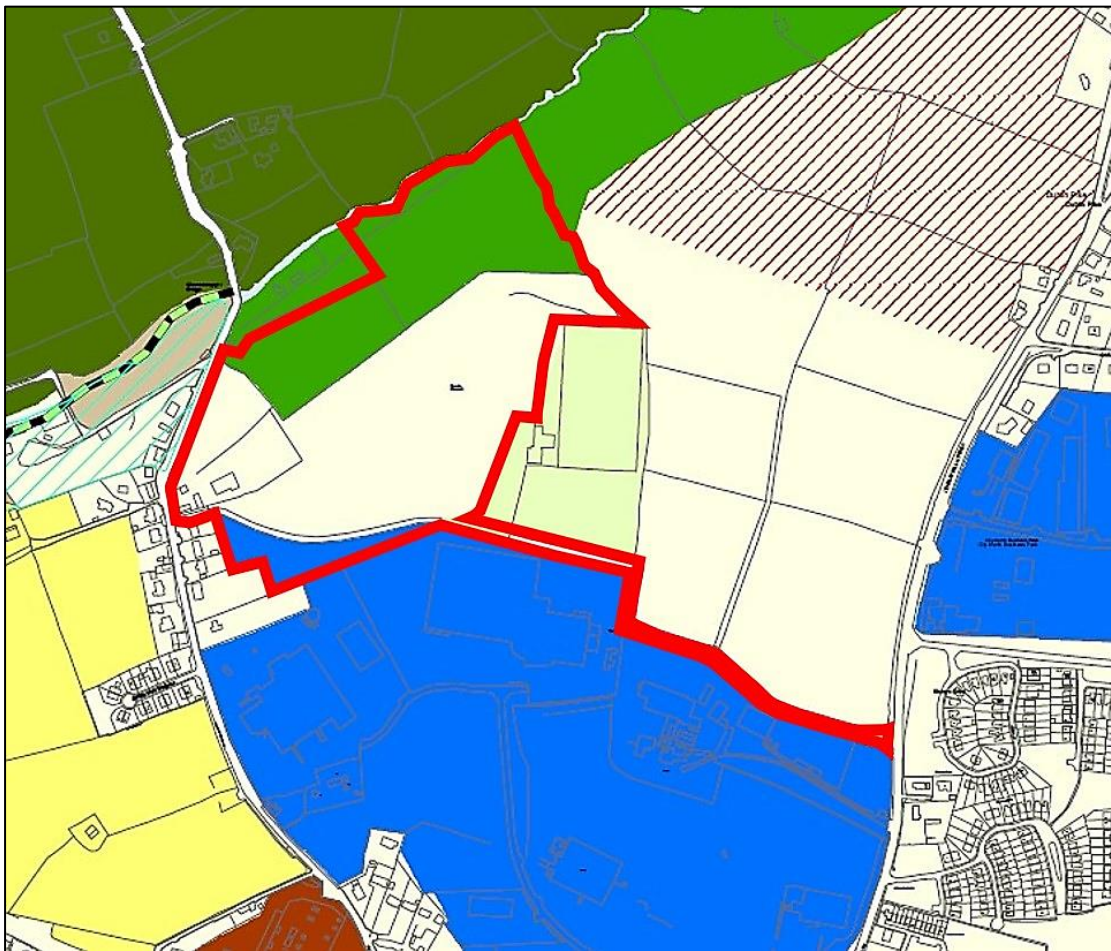


Figure 3. Draft zoning objectives for the subject site (generally outlined in red) as per the Draft Cork City Development Plan 2022-2028.

4.1.2 A submission was made on behalf of the applicants to the Draft Plan which requested that the lands be zoned to reflect the current development proposal with ZO 1 Sustainable Residential Neighbourhoods and ZO 16 Public Open Space zoning objectives. The **Proposed Material Amendments** to the Draft Cork City Development Plan 2022-2028 proposed the following zoning changes for the subject site:

- **Zoning Amendment 2.54:** From ZO 10 Light Industry & Related Uses to ZO 1 Sustainable Residential Neighbourhoods (south of the internal road, area in blue above)
- **Zoning Amendment 2.55:** From ZO 16 Public Open Space to ZO 1 Sustainable Residential Neighbourhoods (to the north along the boundary to the river, part of area in green above)
- **Zoning Amendment 2.56:** From ZO 17 Sports Grounds & Facilities to ZO 1 Sustainable Residential Neighbourhoods (area to the east, in pale yellow above)

4.1.3 The City Council Chief Executive's report recommended that the amendments be adopted without modification, which they were at the adoption of the Plan.

4.1.4 Having made the Development Plan with these amendments included, the zoning of the site therefore now reflects the site layout of the residential development proposal, which is the subject of this application.

The site has two zoning objectives as follows:

- **ZO 1 Sustainable Residential Neighbourhoods** – relating to the lands located at the central and southern side of the site, where the objective is:

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

Section ZO 1.1 notes that the provision and protection of residential uses and residential amenity is a central objective of this zoning. Section ZO 1.2 states that development in this zone should generally respect the character and scale of the neighbourhood in which it is situated. Development that does not support the primary objective of this zone will be resisted. Section ZO 1.3 outlines the primary uses in this zone and include residential uses, crèches, schools, home-based economic activity, open space, and places of public worship

- **ZO 15 Public Open Space** – relating to the lands at the northern side of the site which are proposed to be developed as a riverside park, where the objective is to protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas, and amenity facilities.

Section ZO 15.1 states that the primary purpose of this zone is to preserve all land in this zone for open space and amenity use. Section ZO 15.2 advises that there is a presumption against developing land zoned Public Open Space for alternative purposes.

A small area at the Delaney's GAA Club car park is zoned for sports use, while the access road to Dublin Hill is zoned residential. The proposed development site is also designated as a Tier 2 site, as per Figure 2.21 of the Development Plan. Section 12.13 of the Plan explains that Tier 2 lands are serviceable zoned lands that are not currently fully serviced but have the potential to become fully serviced within the life of the Plan.

4.1.5 The site is located in the Blackpool Kilbarry Expansion Area. The following City Development Plan objectives for this area are set out below:

- **Objective 10.75 Blackpool Kilbarry Expansion Area**

*To support the compact growth and development of Blackpool/Kilbarry Expansion Area as a strategic City expansion area, as identified in the Core Strategy. All development shall be designed, planned and delivered in a co-ordinated and phased manner, using a layout and mix of uses that form part of an emerging neighbourhood integrated with the wider area.*



- **Objective 10.76 Blackpool / Kilbarry Framework Plan**  
Cork City Council will produce a Framework Plan for the development of the Blackpool / Kilbarry area. The coordinated provision of services, infrastructure, mix of land uses, transport and mobility, quality urban design and development will form part of the overall framework.
- **Objective 10.77 Blackpool Neighbourhood Centre Regeneration Plan**  
Cork City Council will produce a Plan for the regeneration of the Blackpool Neighbourhood Centre. The coordinated provision of services, infrastructure, mix of land uses, transport and mobility, quality urban design and public realm development will form part of the overall framework.
- **Objective 10.78 Blackpool / Kilbarry Development Objectives**
  - a. To create a high quality, vibrant, distinct and accessible mixed-use urban centre in Blackpool, serving as an attractive northern gateway to the City and a desirable destination for northside suburban communities, encompassing a mix of retail, employment, residential, community and recreational uses.
  - b. To facilitate the development of an integrated public transport interchange centred on the creation of a new commuter rail service and connecting bus services. To encourage and support sustainable residential and employment development in the Kilbarry area along with upgrades in public transport and roads infrastructure.
  - c. To respect and enhance the built heritage and architectural character of the area, through the creation of a high quality public realm and high standards of building design.
  - d. To preserve and enhance the sensitive and distinct landscape, visual character and biodiversity of the area and in turn provide for recreational uses, open space and amenity facilities.

4.1.6 The proposed residential development, with its new childcare facility riverside amenity park, is thus fully in line with the zoning objectives for the site as well as the vision and objectives to develop the strategic Blackpool Kilbarry Expansion Area as a compact, sustainable residential neighbourhood.

4.1.7 The proposed development clearly aligns with and supports the following key strategic principles of the Strategic Vision of the Cork City Development Plan 2022-2028:

- Compact growth
- A city of neighbourhoods and communities
- Sustainable and active travel
- A resilient city
- A healthy, inclusive and diverse city
- A connected city

4.1.8 The subject site is located in Inner Urban Suburb 8, "North Blackpool", described as follows:

*The northern extension of the N20 corridor beyond Blackpool encompassing the industrial area north of the centre and the residential areas on the western side of the N20.*

This Inner Urban Suburb is identified as being suitable for densities of 40-100 units/ha and heights of 3-5 storeys.

Residential density is also addressed in Chapter 3 of the Development Plan. Paragraph 3.24 states:

*Greenfield sites will need to be developed to densities that reflect their suitability for urban density. This will require a step-change in the urban density of schemes being proposed. As a general rule the minimum density shall be 35 dwellings per hectare (net density), excluding one-off houses.*

The proposed development of this greenfield site is therefore consistent with the Development Plan in terms of the residential density proposed as well as the proposed height of 2-5 storeys, noting that the prevailing heights in this area are currently 2-4 storeys and the upper target is 5 storeys.

4.1.9 Table 11.8 of the Development Plan presents the dwelling size mix for housing developments in the city suburbs and is as follows:

	Min	Max	Target
<b>Studios/ PBSA</b> (at LRT Stops/ Urban Centre/ HEI Campus Only)	0%	15%	10%
<b>1 Bedroom</b>	15%	25%	20%
<b>2 Bedroom</b>	25%	40%	34%
<b>3 Bedroom</b>	18%	28%	28%
<b>4 Bedroom/ Larger</b>	5%	15%	8%

**Table 6. City Suburbs Dwelling Size Mix for Housing Developments standards as per the Cork City Development Plan 2022-2028.**

4.1.10 The proposed dwelling mix is as follows:

	Number	%
<b>1 Bedroom</b>	41	12.85%
<b>2 Bedroom</b>	123	38.56%
<b>3 Bedroom</b>	130	40.75%
<b>4 Bedroom</b>	25	7.84%

**Table 7. Proposed Dwelling Size Mix.**

The proposed dwelling mix is generally consistent with the Development Plan standards relating to dwelling mix. The issue of dwelling mix is addressed further in the Statement of Housing Mix and the Statement of Material Contravention, prepared by Coakley O'Neill Town Planning Ltd., copies of which accompany the planning application.

4.1.11 Table 11.11 of the Development Plan states that the general provision for public open space for the proposed development is 15%. The proposed development provides for a total open space provision on the overall lands of 7.051ha (45%), and a total of active open space of 2.777ha (18%). Therefore, the

proposed development is fully consistent with the Development Plan standards regarding open space provision.

- 4.1.12 Para 11.115 of the Development Plan requires all large development proposals to be accompanied by a phasing schedule, while para 11.116 of the Development Plan states the following:

*Developments over 100 residential units shall demonstrate that adequate provisions for specified physical and social infrastructural requirements, including roads, sewers, water mains, community, recreational and sporting facilities (indoor and outdoor), public transport, first and second level schools and shops are available at completion to support the development.*

As detailed in the Construction and Environmental Management Plan (CEMP) prepared by JB Barry Consulting Engineers, copies of which accompany this planning application, it is estimated that the proposed phases will take 36 months to complete, with approximately 12 months construction for each of the three phases.

In addition, a Social and Community Audit (SCA) has been prepared by Coakley O'Neill Town Planning, copies of which accompany the planning application. The SCA demonstrates that adequate social infrastructure is available in the area to serve the proposed development.

- 4.1.13 Para 11.224 of the Development Plan stipulates that the layout of proposed new residential developments must be designed in accordance with the Design Manual for Urban Roads and Streets (DMURS). A DMURS Compliance Statement has been prepared in respect of the proposed development by DMN Architects, copies of which have been submitted with this planning application.

- 4.1.14 According to para 11.234 of the Development Plan, the site of the proposed development is located in Zone 2. As a result, the following maximum car parking standards apply:

- Residential (1-2 bedroom) – 1 space per unit
- Residential (3-3+ bedroom) – 2 spaces per unit
- Crèche – 1 space per 6 students

In addition, the Development Plan requires that multi-unit residential developments should provide a minimum of 1 EV equipped parking space per 5 car spaces, that apartment developments should provide 1 motorcycle parking space for every 10 car spaces, and that 5% of car parking spaces provided should be set aside for disabled car parking.

The proposed development is generally consistent with the above car parking standards. The provision of 12no. spaces for the proposed crèche fully complies with the Development Plan standard.

Regarding the car parking spaces provided for the proposed residential uses, it must be acknowledged that while the above standards have been prepared for Inner Urban Suburban areas of Cork City, this particular location in the Inner Urban Suburb of North Blackpool does not currently benefit from the levels

of sustainable transport infrastructure which would support the above levels of car parking provision. Therefore, it is considered that the 406no. car parking spaces to serve the proposed houses and the 116no. spaces for the proposed apartments and duplexes can be considered acceptable in this instance.

According to the Development Plan, bicycle parking should be provided at a rate of:

- 0.5 per suburban apartment
- 1 per 25 children enrolled at a crèche

118no. bicycle parking spaces are proposed for the residential element and 6no. bicycle parking spaces are proposed for the crèche facility, which both exceed the Development Plan standards for bicycle parking provision.

The proposed parking provision is addressed further in the Statement of Material Contravention, prepared by Coakley O'Neill Town Planning Ltd., copies of which accompany the planning application.

4.1.15 Other key objectives of the Development Plan which apply to the assessment of the proposed development are set out in Table 7 below.

<b>Cork City Development Plan 2022-2028 Objective</b>	<b>Consistency of Proposed Development</b>
<p>Strategic Objective 1 Compact Liveable Growth</p> <p><i>To increase the population of Cork City in line with national and regional growth targets. To develop Cork City as an international compact, sustainable healthy city of scale and the regional driver of growth by creating sustainable, liveable, integrated communities and neighbourhoods for all. To plan to deliver at least half (50%) of all new homes in the existing built-up footprint of the City.</i></p>	<p>By increasing the supply of homes in Kilbarry by 319no., the proposed development will increase the population of Cork City in line with national growth targets. The proposed development, with a density of 38.77units/ ha, will also deliver this increase of housing supply in a compact manner.</p>
<p>Strategic Objective 2 Delivering Homes and Sustainable Neighbourhoods</p> <p><i>To increase the population of Cork City in line with the Core Strategy. To deliver sustainable, liveable, integrated, safe, healthy and child friendly communities and neighbourhoods. To ensure that new homes are provided at</i></p>	<p>The proposed development involves the development of a greenfield location within and contiguous to existing City footprint that is identified in the Development Plan's Core Strategy as a strategic residential growth area.</p> <p>Placemaking has been one of the key considerations in the design of the proposed development. The proposed development promotes the concepts of</p>

<p><i>appropriate densities in brownfield, infill and greenfield locations within and contiguous to existing City footprint identified in the Core Strategy, and aligned with transport, community and social infrastructure. To ensure that new homes are provided with a good mix of accommodation types and sizes to meet the needs and abilities of all members of society.</i></p> <p><i>To achieve a higher quality of life for Cork City's communities, promoting healthy living, wellbeing and active lifestyles. To ensure that placemaking is at the heart of all development to create attractive, accessible, liveable, well-designed, child-friendly, playful, healthy, safe, secure and welcoming, high-quality urban places. To promote the concept of a 15-minute city focused on inclusive, diverse and integrated neighbourhoods served by a range of homes, amenities, services, jobs and active and public transport alternatives.</i></p> <p><i>Proposals for new development will demonstrate how placemaking is at the heart of the development and how the development will contribute to the local neighbourhood.</i></p>	<p>enclosure, the clear separation of public/ private realm and permeability as the means to achieve a high-quality residential environment as a key consideration in the design of the layout. In this regard, a recreational spine has been provided throughout the development, with designated play areas, and links to the public park, improving permeability both throughout the site and in the wider area.</p> <p>The provision of a 71no. child crèche will also support the level of childcare provision in the local area, and will likely bring about interactions between new residents of the scheme and existing residents of the local area, thus further integrating the proposed development with the existing community in Kilbarry.</p> <p>All of the above will support the realisation of a sustainable, liveable, integrated, safe, healthy and child friendly community and neighbourhood on site.</p>
<p>Objective 2.18 Underutilised Sites</p> <p><i>Cork City Council will seek to address issues of dereliction, vacancy and underutilisation of sites within Cork City by encouraging and facilitating their re-use and regeneration subject to good planning and the infrastructural carrying capacities of the area.</i></p>	<p>The site of the proposed development includes a disused hurley manufacturing factory as well as scrubland that is used as in informal open space amenity by locals. The proposed development involves the demolition of the disused factory on site and the landscaping of a new riverside amenity park. This will have the effect of rejuvenating a currently underutilised site as well as rationalising the open space land use of the northern part of the site.</p>
<p>Objective 3.5 Residential Density</p> <p><i>Cork City Council will seek to:</i></p> <p><i>a. Promote compact urban growth by encouraging higher densities throughout Cork City according to the Cork City Density</i></p>	<p>The proposed development is for a new, suburban, high density residential neighbourhood on an underutilised, greenfield site in Kilbarry in the north of Cork City. Given the surrounding site context of low-density, single detached dwellings, light industrial development, and sports uses, it is submitted that the scale, design and density of the</p>

<p><i>Strategy, Building Height and Tall Building Study and resultant standards set out in Chapter 11: Placemaking and Managing Development and Mapped Objectives; and</i></p> <p><i>b. Ensure that urban density is achieved by development proposals providing for high quality sustainable residential development, ensure a balance between the protection of the established character of the surrounding area and existing residential amenities;</i></p> <p><i>c. Ensure that urban density is closely linked to creating successful neighbourhoods (see 3-A-1, above) and ensuring that neighbourhoods are integrated and permeable to ensure short trips are possible to urban centres, local services and amenities;</i></p> <p><i>d. Ensuring high-quality architectural, urban and public realm design. Guidance is set out in Chapter 11: Placemaking and Managing Development.</i></p>	<p>proposed development all strike an appropriate balance with their context. This will help achieve the successful integration of the proposed development with the existing pattern of land use in the area.</p> <p>The integration of the proposed development with the surrounding area will also be achieved by virtue of the fact that the site layout has been designed to be permeable, facilitating ease of access for both future residents and others living and working in the local area to access the new public riverside amenity park in the northern part of the site.</p> <p>In addition, as discussed above, the provision of a crèche on site will further integrate the proposed development with the surrounding local contact and community.</p>
<p>Objective 3.6 Housing Mix</p> <p><i>Cork City Council will seek to:</i></p> <p><i>a. Implement the provisions of the Joint Housing Strategy and HNDA as far as they relate to Cork City;</i></p> <p><i>b. Encourage the development of an appropriate mix of dwelling types to meet target residential densities, utilising a range of dwelling types and density typologies informed by best practice (as illustrated in "Density Done Well" in the Cork City Density Strategy, Building Height, and Tall Building Strategy) with combinations of houses, stacked units and apartments;</i></p> <p><i>c. Within all new residential developments it will be necessary to ensure an appropriate balance of housing tenure and dwelling size to sustain balanced and inclusive communities, including a balance of family-sized units and smaller dwellings tailored to suit the location</i></p>	<p>The proposed development involves the provision of 85no. semi-detached units (17no. 4-bed units and 68no. 3-bed units), 118no. terraced units (8no. 4-bed units, 60no. 3-bed units and 50no. 2-bed units), 53no. duplex units (26no. 1-bed units, 25no. 2-bed units and 2no. 3-bed units) and 63no. apartments (15no. 1-bed units and 48no. 2-bed units).</p> <p>It is submitted that this mix of 12.85% 1-bed, 38.56% 2-bed, 40.75% 3-bed and 7.84% 4-bed homes is appropriate in that it will provide an increase of supply in the local area of 1 and 2-bed homes, whilst at the same time also providing appropriately sized housing for larger households.</p> <p>In addition, the provision of 62 no. new social homes to satisfy the applicant's Part V obligations will ensure a mixed tenure, sustainable neighbourhood will be realised on site.</p>

<p><i>(please refer to Chapter 11: Placemaking and Managing Development for those standards);</i></p> <p><i>d. Deliver at least 20% below-market priced housing across Cork City and ideally within each new residential neighbourhood;</i></p> <p><i>e. Encourage the provision of housing for one and two person households in all neighbourhoods to meet the needs of all age groups, including providing for downsizing to release family housing units;</i></p> <p><i>f. Update Development Plan policy as necessary to reflect emerging national guidance with regard to housing standards.</i></p>	
<p>Objective 3.21 Childcare Facilities</p> <p><i>To support the provision and expansion of high quality childcare facilities throughout the city. The Council will:</i></p> <p><i>a. Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered.</i></p> <p><i>b. Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed.</i></p>	<p>As described above in this statement, the proposed development involves the provision of a new, 519m<sup>2</sup> crèche facility in the south-western part of the site near the site's entrance from Old Whitechurch Road. This new childcare facility will have a capacity to cater for 71 no. children and will be provided with a dedicated outdoor play area as well as 12 no. dedicated car parking spaces and 6 no. dedicated bicycle parking spaces.</p>
<p>Objective 3.31 Inclusive Design</p> <p><i>To promote and where applicable implement inclusive design in all new development and in works to existing buildings and facilities including open space and public realm areas to optimise the facilities for all age groups and abilities. This includes embracing the National Disability Authority's Universal Design Guidelines, age friendly principles and international best practice.</i></p>	<p>As detailed in the Universal Design Statement which has been submitted as part of this planning application, the proposed development has been designed to be an equitable, safe, readable, easy-to-get-around place where the homes themselves have been designed to adapt to residents changing needs during the life cycle.</p>



<p>Objective 6.18 Public Open Space</p> <p><i>a. To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes. There will be a presumption against development of land zoned Public Open Space for alternative purposes.</i></p> <p><i>b. There will be presumption against development on all open space in residential estates in the city, including any green area / public amenity area that formed part of an executed planning permission for development and was identified for the purposes of recreation / amenity open space, and also including land which has been habitually used as public open space. Such lands shall be protected for recreation, open space and amenity purposes.</i></p> <p><i>c. The development of open spaces should "aim to enhance and protect natural features and views and be set in safe and secure environments with the emphasis on active open spaces accessible to and enjoyed by all sectors of the community.</i></p> <p><i>d. To follow an approach of qualitative as well as quantitative standards for open spaces providing high quality open spaces with high levels of access to recreation for local communities, including good practices of inclusive design.</i></p> <p><i>e. Specific design outcomes should be framed in relation to the nature of spaces being created or enhanced (e.g. in relation to maintenance, nature exposure and connectivity, strategic landscape and social role).</i></p> <p><i>f. Support measures to green the city, including re-grassing of appropriate hard-surfaced areas in locations throughout the City.</i></p>	<p>The proposed development includes the provision of a new, public riverside amenity park on lands zoned for open space use.</p> <p>There are a number of high quality landscaped open spaces provided for within the development with a variety of uses proposed. These vary from the pocket parks located close to housing, to the large areas of open space around the apartments to the new public park located within the land to the north of the site along the valley to the Glenamought/ Bride river.</p> <p>Taking both active and passive open space areas, within the entire site (red line boundary) the development provides a total of 7.051Ha of both active and passive open space. As a percentage of the overall site (red line) this is 45%. In terms of useable Open Space, 18% of the overall site boundary consists of useable open space.</p>
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<p>Objective 6.20 Active Recreational Infrastructure</p> <p><i>a. To ensure that all residents have access to neighbourhood scale outdoor and indoor active sports recreational infrastructure within their neighbourhood or in accessible locations.</i></p> <p>[and]</p> <p><i>f. To require new residential developments over 10 units and other major developments to meet those active recreation needs generated by the development with the provision of appropriate active recreation infrastructure.</i></p>	<p>It is considered that adequate provision of recreation and amenity facilities have been provided throughout the site. A mixture of facilities has been provided throughout the site including an outdoor gym, kickabout areas, a playground, and the riverside amenity park.</p>
<p>Objective 7.8 Mobility Management Plans</p> <p><i>In addition to traffic impact assessments, Cork City Council will require all planning applications for new employment uses, or extensions to existing commercial premises, for 100 or more employees to prepare mobility management plans which promote and prioritise the use of more sustainable transport modes.</i></p>	<p>A Traffic and Transport Assessment and a Mobility Management Plan have both been prepared by MHL Consulting Engineers regarding the proposed development, and copies of both are submitted as part of this SHD planning application.</p>
<p>Objective 11.2 Dwelling Size Mix</p> <p><i>All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances.</i></p> <p><i>Applications for 10-50 dwellings will need to provide a dwelling size mix that benefits from the flexibility provided by the dwelling size target ranges provided for the respective sub-area.</i></p> <p><i>Purpose-Built Student Accommodation schemes will be exempt from dwelling size mix</i></p>	<p>The proposed development involves the provision of 85no. semi-detached units (17no. 4-bed units and 68no. 3-bed units), 118no. terraced units (8no. 4-bed units, 60no. 3-bed units and 50no. 2-bed units), 53no. duplex units (26no. 1-bed units, 25no. 2-bed units and 2no. 3-bed units) and 63no. apartments (15no. 1-bed units and 48no. 2-bed units).</p> <p>It is submitted that this mix of 12.85% 1-bed, 38.56% 2-bed, 40.75% 3-bed and 7.84% 4-bed homes is appropriate in that it will provide an increase of supply in the local area of 1 and 2-bed homes, whilst at the same time also providing appropriately sized housing for larger households.</p>

<p><i>targets. Where there is a target for student accommodation, and it can be demonstrated that this demand has been provided for within the area, then this demand can be reassigned to other dwelling sizes according to the relative target proportions.</i></p> <p><i>Where a clear justification can be provided on the basis of market evidence that demand / need for a specific dwelling size is lower than the target then flexibility will be provided according to the ranges specified.</i></p>	<p>Please refer to the Statement of Housing Mix prepared by Coakley O'Neill Town Planning regarding the proposed development, which is submitted as part of this SHD planning application.</p>
<p>Objective 11.4 Daylight Sunlight and Overshadowing (DSO)</p> <p><i>All habitable rooms within new residential units shall have access to appropriate levels of natural/ daylight and ventilation. Planning applications should be supported by a daylight and sunlight design strategy that sets out design objectives for the scheme itself and its context that should be included in the Design Statement.</i></p> <p><i>The potential impacts of the proposed development on the amenities enjoyed by adjoining properties will need to be assessed in relation to all major schemes and where separation distances are reduced below those stipulated. Cumulative impacts of committed schemes will also need to be assessed.</i></p> <p><i>Daylight, Sunlight and Overshadowing (DSO) assessment, utilising best practice tools, should be scoped and agreed with the Planning Authority prior to application and should take into account the amenities of the proposed development, its relevant context, planning commitments, and in major development areas the likely impact on adjacent sites.</i></p>	<p>A Daylight, Sunlight &amp; Overshadowing Assessment has been prepared in respect of the proposed development by BPC Engineers and copies of this assessment are submitted as part of this SHD planning application.</p> <p>The Assessment states that, overall, the proposed development has been designed with due consideration for sunlight and daylight and exceeds the recommendations as set out in BRE Guide "Site Layout Planning for Daylight and Sunlight, A guide to good practice." (Paul Littlefair, 2022 Third Edition).</p> <p>In addition, the open spaces associated with the proposed development are expected to experience good levels of sunlight and should appear adequately sunlit throughout the year.</p>
<p>Objective 12.1 Land Uses and Flooding</p>	<p>The northern site boundary abuts the Glenamought/Bride River. This river has a high probability of</p>

<p><i>To Facilitate the appropriate management and sustainable use of Flood Zones A &amp; B identified by the Strategic Flood Risk Assessment.</i></p>	<p>flooding and is categorised as Flood Zone A in this location.</p> <p>A Flood Risk Assessment has been prepared by JB Barry Consulting Engineers regarding the proposed development and is included as part of this SHD planning application.</p> <p>The National Flood Hazard Mapping Website does not show any records of historic flooding occurring at the proposed development site.</p> <p>The Catchment-based Flood Risk Assessment and Management website shows that the flood extent of the River Bride extends to the northern most portion of the proposed development site. However, it should be noted that no proposed development will occur at this portion of the site. There is a very steep rise from the river to the remainder of the site at the northern boundary and it is intended to leave this portion of the site as green open space area. The existing ground level in the northern portion of the site where flooding is confined to is c. +50mOD whereas the existing ground level where the development is proposed is between +68mOD and +89mOD. All highly vulnerable development will be constructed outside of the River Bride 0.1% AEP flood extent and is therefore located within Flood Zone C.</p>
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**Table 7. Key Objectives of the Cork City Development Plan 2022-2028 relevant to the proposed development.**

## 5.0 SUMMARY

5.1 A Statement of Material Contravention has been prepared by Coakley O'Neill Town Planning in respect of the proposed development and is included as part of this planning application.

5.2 The key arguments of that statement are:

- The proposed number of 3-bed units marginally exceeds the maximum set out in the Development Plan. The percentage exceedance of 2.75% equates to 8 to 9 residential units. In the context of the overall scheme and the scale and extent of development in the immediate area and across the northside of the city, this exceedance is not considered material or significant. However, on the basis that a material contravention of the City Development Plan may occur, the statement has been prepared.
- The proposed residential density at 38.77 falls slightly short of the target density for this location of 40 units per hectare. We also consider that this slight shortfall, equating to 1.23% or a total of 10no. units, is not material of significant. The provision of 2 car spaces for the 2-bed residential houses, has led to an exceedance of the Plan's car parking standards. Again, this is not considered material.
- However, if the Board considers that a material contravention may arise, then Section 37(2) of the Planning and Development Act 2000 (as amended) provides for the Board to grant permission where the proposed development materially contravenes the development plan in certain circumstances.
- In addition, that the proposed development is being progressed through the Strategic Housing Development planning process in itself confirms the strategic importance of the proposal, in accordance with Section 37(2)(b)(i). The proposed development will contribute to an increased supply of residential accommodation in the context of a chronic housing shortage and thus support national and regional policy objectives to deliver more homes within the existing footprint of cities and in cities other than Dublin to achieve regional parity in the country.
- In this context, it is our submission that the Board can grant planning permission for the proposed development in accordance with Section 9(6)(c) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended), and Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).

## 6.0 CONCLUSION

- 6.1 This statement, in setting out the particulars of the proposed development, demonstrates the compliance of the proposed development with the relevant national, regional, and local planning policy context.
- 6.2 At a national level, this statement has confirmed the proposed development's compliance with the following relevant planning policies at a national and strategic level:
- Project Ireland 2040 - National Planning Framework (2018);
  - Housing for All - a New Housing Plan for Ireland' (2021);
  - Regional and Spatial Strategy for the Southern Region (2020);
  - Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009);
  - Sustainable Urban Housing Design Standards for New Apartments (2020);
  - Urban Design Manual – A Best Practice Guide;
  - Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
  - Quality Housing for Sustainable Communities (2007);
  - Design Manual for Urban Roads and Streets (2013);
  - Guidelines for Planning Authorities on Childcare Facilities (2001);
  - Smarter Travel – A New Transport Policy for Ireland (2009-2020);
  - The Planning System and Flood Risk Management (2009); and
  - Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)
  - Climate Action Plan 2021
- 6.4 At a local level, this statement has also confirmed the proposed development's compliance with the strategic, qualitative and quantitative standards of the Cork County Development Plan 2022-2028.
- 6.5 It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this residentially zoned site, within the Cork City boundary, in close proximity to existing services and facilities.
- 6.6 In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines.

**APPENDIX A – CORK COUNTY DEVELOPMENT PLAN 2014 AND COBH MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 POLICY AND OBJECTIVES**

## A.1 Cork County Development Plan, 2014

A.1.1 While the subject site is now included within the Cork City boundary, as of May 2019, it is noted that the site was subject to the Cork County Council Development Plan 2014 and Cobh Municipal District Local Area Plan 2017.

A.1.2 The North Environs are identified as being in the Cork Gateway as per Table CS 3-1 of the County Development Plan, which outlines the settlement hierarchy for Cork, with the North and South Environs forming the first tier of the hierarchy. The strategic aim for the North Environs is set out in Table CS 3-1, as is outlined as follows:

*Growth in population and employment so that the Cork Gateway can compete effectively for investment and jobs. Develop to complement & consolidate the development of the city as a whole and providing enhanced potential to rebalance the City through new development in the north.*

A.1.3 Having regard to **Objective CS 3-1**, the principle of residential development in Kilbarry in the north environs is considered to be acceptable as helping to rebalance the city through new development in the north. The proposed development has also had regard to the objectives of the development plan, and the relevant objectives and the proposed development's consistency with these objectives is outlined in Table A.1 below.

Objective	Development's consistency
<b>CS 4-1 G</b>	The proposed development will deliver residential development in the north environs, which will help achieve the aim of rebalancing development to the north of the city through increased population growth.
<b>CS 4-1 N</b>	The subject site is located in the Cork Gateway, where development to provide the homes and jobs necessary to serve the planned population are prioritised in certain locations, specifically including the north environs.
<b>HOU 3-1</b>	The proposed development has had full regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual (as outlined in Section 3. of this report). The proposed development promotes sustainable methods of transport including walking, with permeability facilitated within the development itself as well as connectivity to the adjoining GAA Grounds.
<b>HOU 3-2</b>	The proposed development has had full regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual. The Council's Design Guide for Residential Estate Development is also based on these documents and therefore it is considered that the proposed development is also in accordance with this Council guidance. In addition, a Design Statement and a Statement on DMURS compliance is included with this application which satisfies Objective HOU 3-2 (c) and HOU 3-2 (d) respectively.
<b>HOU 3-3</b>	A Statement on Housing Mix has been prepared and is submitted with this application



<b>HOU 4-1</b>	The proposed density of the development is 38.77 units/ha (based gross developable area) which is in accordance with the Medium A Density criterion.
<b>HOU 5-1</b>	It is noted that this requirement is superseded by the requirements of the amended Planning and Development Regulations (2015), pursuant to Part V, s.96 of the Planning and Development Act 2000 (as amended), which requires a provision of 20% social housing. The proposed development will include the provision of 20% social housing, to be transferred to the Planning Authority. Specific details relation to Part V provision will be confirmed prior to formal submission.
<b>SC 1-1</b>	The proposed development includes the provision of a public park along the southwestern boundary of the site. This will be to the benefit of both existing and future residents of the wider area.
<b>SC 3-1</b>	The proposed development includes the provision of a 71-child crèche in line with the requirements of the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006, which satisfies this objective. A childcare need assessment has been prepared and is submitted with this SHD planning application.
<b>SC 4-1</b>	As noted, a childcare facility will be provided as part of this development.
<b>SC 5-2</b>	The provision of public open space is consistent with the relevant planning policy documents, as outlined in Section 3 of this report
<b>SC 5-3</b>	Taking both active and passive open space areas, within the entire site (red line boundary) the development provides a total of 7.051Ha of both active and passive open space. As a percentage of the overall site (red line) this is 45%. In terms of useable Open Space, 18% of the overall site boundary consists of useable open space.
<b>SC 5-5</b>	It is considered that adequate provision of recreation and amenity facilities have been provided throughout the site, in line with the Council's Interim Recreation and Amenity policy. A mixture of facilities has been provided throughout the site including an outdoor gym, kickabout areas, a playground, and a river side amenity park.
<b>SC 5-8</b>	The private open space provided is in line with the standards contained in the relevant guidance documents.
<b>TM 2-2</b>	The proposed development places an emphasis on walking as a more appropriate mode of transport. Where appropriate, shared surfaces have been introduced to ensure that every part of the development is accessible on foot. The streetscape of the proposed development will ensure that the needs of pedestrian, cyclists and those with special mobility needs are met appropriately, in line with the guidance of DMURS.
<b>TM 3-3</b>	A Traffic and Transport Assessment has been prepared and is submitted as part of this SHD planning application.
<b>TM 4-1</b>	Cycle parking has been provided in accordance with the requirements set out in Appendix D of the County Development Plan. These parking areas have been provided at appropriate locations. Any parking areas provided are located in areas which benefit from passive surveillance and will be landscaped so as to enhance the environment and be respectful of the streetscape. Parking areas will provide for safe and easy access for pedestrian and cyclists.
<b>WS 3-1</b>	Wastewater collection will be via a network of gravity sewers for ultimate discharge to Irish Water's wastewater network in Old Whitechurch Road immediately to the west of

	the site. Additional details in relation to wastewater disposal are available in the Services Infrastructure Report and associated drawings submitted with this application.
<b>WS 5-1</b>	Surface water collection will be via a network of gravity surface water drains discharging to a proposed stormwater attenuation facility in the north-west area of the site. The attenuated discharge from the storage area will be directed to the Glenamought/Bride River which is located at the northern boundary of the site. Additional details in relation to surface water management are available in the Services Infrastructure Report and associated drawings submitted with this application.
<b>WS 5-3</b>	As above, surface water will be managed appropriately on site
<b>WS 7-1</b>	Any waste generated by the proposed development will be managed in accordance with best practice.
<b>HE 2-3</b>	The existing hedgerows and trees along the site boundary will be retained and protected where appropriate. All trees to be maintained will be protected appropriately during construction and operation.
<b>GI 6-1</b>	The proposed development has been designed to minimise any adverse impact on the visual and scenic amenities of the local environment. This has been achieved through considered design and siting, the incorporation of appropriate landscaping and the protection of existing landscape features including hedgerows. Chapter 12 of the EIAR, which has been prepared in respect of the proposed development and submitted as part of this SHD planning application, contains a Landscape and Visual Impact Assessment of the proposed development.
<b>GI 7-1</b>	It is noted that there are no protected views in the vicinity of the site. Nevertheless, a Landscape and Visual Impact Assessment has been prepared in respect of the proposed development (please refer to Chapter 12 of the EIAR which has been submitted as part of this SHD planning application).
<b>ZU 3-2</b>	The non-residential uses on site are complimentary to the primarily residential nature of the site. The crèche, play areas and open space amenity areas also support the future community of the development.

**Table A.1: Development consistency with Cork County Development Plan 2014 Objectives.**

## **A.2 Cobh Municipal District Municipal District Local Area Plan 2017**

A.2.1 The subject site was located within the development boundary of the North Environs, which is included in the Municipal District of Cobh and was therefore subject to the policies and objectives contained within the Cobh Municipal District Local Area Plan 2017.

A.2.2 The overall landholding was subject to 3 no. separate zoning objectives, and these are outlined as follows:

### **Residential (8.7ha) Objective NE-R-03**

*Medium B density residential development. Significant improvements will be required to the local road network to facilitate improved vehicular, cyclist, and pedestrian access prior to any development. A detailed Transport Impact Assessment will be required to accompany any future applications.*

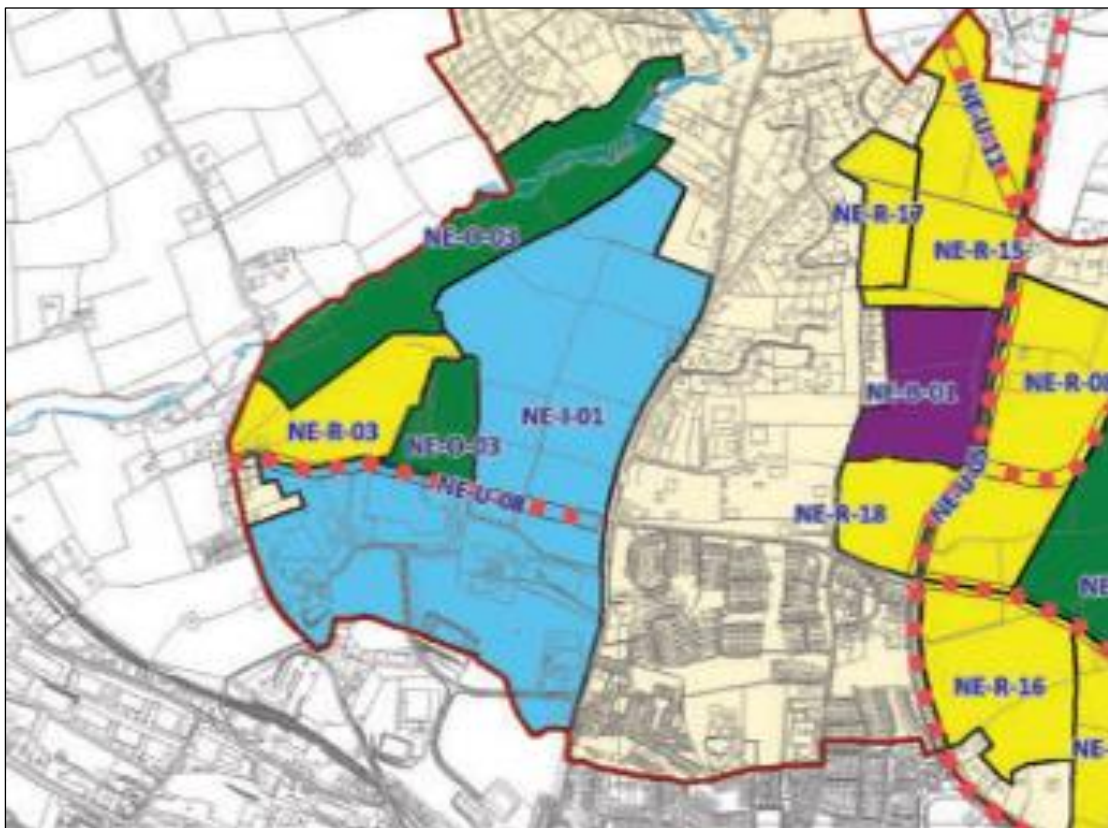
### **Industry (0.8ha) Objective NE-I-01**

*Industrial development at Kilbarry to serve the Northern Suburbs. Any development should include appropriate pedestrian and cycling connectivity with the proposed train station and wider Blackpool area. Retail warehousing will not be permitted within the site.*

### **Public Open Space (5.85ha) Objective NE-O-03**

*Open Space for public recreation. This site includes a number of playing pitches which are an important amenity for the area. It is important to retain this site for open space uses. The remainder of the site serves to protect the visual amenity.*

- A.2.3 While the subject site is zoned for Medium B density, it is considered that a higher density can be achieved having regard to the size of the site, national policy encouraging higher density development within existing cities, and the proposed public transport improvements in the wider area, including a proposed railway station at Kilbarry.
- A.2.4 On this basis, 319 no. units are proposed as part of the subject development. Using the gross developable area of c. 15.52 hectares, a gross density of 20.55 units per hectare is achieved, while using the net developable area of 8.229 hectares yields a net density of 38.77 units per hectare on the site.



**Figure A1: Extract from North Environs Land Use Zoning Map. (Source: Cobh Municipal District Local Area Plan 2017).**

- A.2.5 The proposed use of part of the site as a residential development complies with Objective NE-R-03, while the partial proposed use of the site as a new amenity riverside park complies with Objective NE-O-03. It

is noted that increased permeability throughout the site is provided, with indicative connections highlighted to the northeast to allow for future connectivity to lands there.

- A.2.6 It is further noted that there is a road objective directly along the south of the subject site, under objective NE-U-08, which seeks a link road through Kilbarry employment area, linking the Ballyhooly Road to the Kilcully Road. The proposed development allows for the provision of this road to the south of the site and indicates how the road will link to the Ballyhooly Road to the east of the site.
- A.2.7 The Local Area Plan also includes a series of General Development Objectives for the North Environs, those of note to the subject development are set out hereunder.

Objective	Development's Consistency
<b>NE-G-02</b>	As set out in the engineering services report submitted as part of this pre-planning package, Irish Water confirmed via Confirmation of Feasibility that the proposed development can connect to existing Irish Water services.
<b>NE-G-03</b>	It is respectfully submitted that the proposed development has been designed to respond to the site. Specifically, it is noted that the stepped down location of the apartment units have been designed to overlook the proposed park. The orientation of apartment and duplex units has been designed to allow for the vast majority of units to benefit from being dual aspect.
<b>NE-G-04</b>	The permeability of the site has been a key consideration for the design of the proposed layout. Indeed, promoting the concepts of enclosure, the clear separation of public/ private realm and permeability as the means to achieve a high-quality residential environment was a key consideration in the design of the layout. In this regard, a recreational spine has been provided throughout the development and links to the public park, improving permeability both throughout the site and in the wider area.

**Table A.2: Development consistency with Local Area Plan Zoning Objectives.**