



COAKLEY O'NEILL
town planning

Planning Report

Cork GAA Lands, Old Whitechurch Road
Kilbarry, Cork

Prepared in June 2022 on behalf of

CORK COUNTY GAA BOARD

Coakley O'Neill Town Planning Ltd.

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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 planning report to accompany an application for a proposed Strategic Housing Development to An Bord Pleanála, as enacted under the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, at the Old Whitechurch Road, Kilbarry, Cork.
- 1.2 This planning report sets out how, in our opinion, the proposed scheme complies with the proper planning and development of this area in the context of relevant national, regional, 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. 15.22ha 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 side.



Figure 1: Site Location (generally outlined in red) (Base image source: OSI; Annotated by Coakley O'Neill Town Planning, 2022).

- 2.2 The lands are bounded to their north by the Glenamought/ Bride River and Valley. Here, the lands slope 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 Along the southern boundary is a roadway running between the GAA club and the Old Whitechurch Road. 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.



View of Adjoining Technology Park



Roadway running through Site



Old Hurley Factory



View of Site looking Northwards



Access at Adjoining GAA Grounds



View Northwards to River Valley

3.0 PLANNING HISTORY

Planning Applications in the Vicinity of the Subject Site

3.1 Outline planning permission was granted for light industrial development and the lands were marketed, without success, for such use in the late 1970s. In 2002 another outline planning application was made (Application Register Reference: S/02/5924), which again sought permission for light industrial units. This application was withdrawn in 2004 prior to a decision being made. There have been no other applications for development on the site since.

Delaney's GAA Club Lands

3.2 There have been 2 no. planning applications in at Delaney's GAA Club. The details of these applications are set out hereunder.

- **Application Register Reference 089438:** Planning permission was granted on 20th January 2009 for the installation of pitch floodlighting to senior pitch consisting of 6 no. masts not exceeding 21m in height above pitch level and having an average light level of 400lux at 1m above pitch level, all at Delaney's GAA Club. This was not implemented.
- **Application Register Reference 053183:** Planning permission was granted on 11th August 2005 to relocate existing 38kv cable mast, install 80 m of underground cable, and retire 80 m of overhead line, all at Delaney's GAA Club.

IDA Lands

3.3 There have been several recent planning applications on the IDA lands to the south of the subject site. The details of these applications are set out in brief below.

- **Application Register Reference 184633:** Planning permission was granted on 11th June 2018 for the retention of existing hybrid lamp standard located in the carpark of the existing Flextronics facility.
- **Application Register Reference 144163:** Planning permission was granted on 23rd April 2014 for the construction of 2 no. loading bays, including internal alteration and associated site works to existing Flextronics facility.
- **Application Register Reference 125856:** Planning permission was granted on 3rd December 2012 for site development works to comprise (A) widening of existing entrance roadway to provide entrance and exit lanes with central island, controlled sliding vehicle access gates and pedestrian access gate (B) enlarge existing hard surface area to provide new large vehicle turning area including additional external lighting adjacent to entrance within site boundaries (C) a new 26 space car parking area to rear of the property including additional external lighting (D) erection of new security fencing to entire perimeter of site boundary at Yves Rocher Manufacturing Ireland.

Old Whitechurch Road – Cork City Council Lands

3.4 Planning permission was granted to Cork City Council under a Part 8 Planning Application for the carrying out of enabling infrastructural work at their landbank on the Old Whitechurch Road. The Infrastructural works include the following:

- the under-grounding of overhead power and communications lines, which will require the removal of metal masts and wooden poles, and the erection of new 'line cable interface' masts;
- the creation of a new junction and improvements on the Old Whitechurch Rd and Old Mallow Rd;
- the provision of a spine access/trunk road including ducting for electricity, gas, Eir and Virgin Media;
- the provision of water, foul and surface water drainage services for Irish Water and the council;
- and connecting existing services to the site including works in the adjacent Kilbarry 110KB sub-station to facilitate the under-grounding of overhead cables.

3.5 This application was funded by the Government's Local Infrastructure Housing Activation Fund (LIHA), to allow for the provision of enabling infrastructure which will help prime the site to deliver at least 600no. homes, many aimed at the affordable housing market. These works have commenced, and the City Council issued a request for expressions of interest from developers to become involved in the development of the project in 2021.

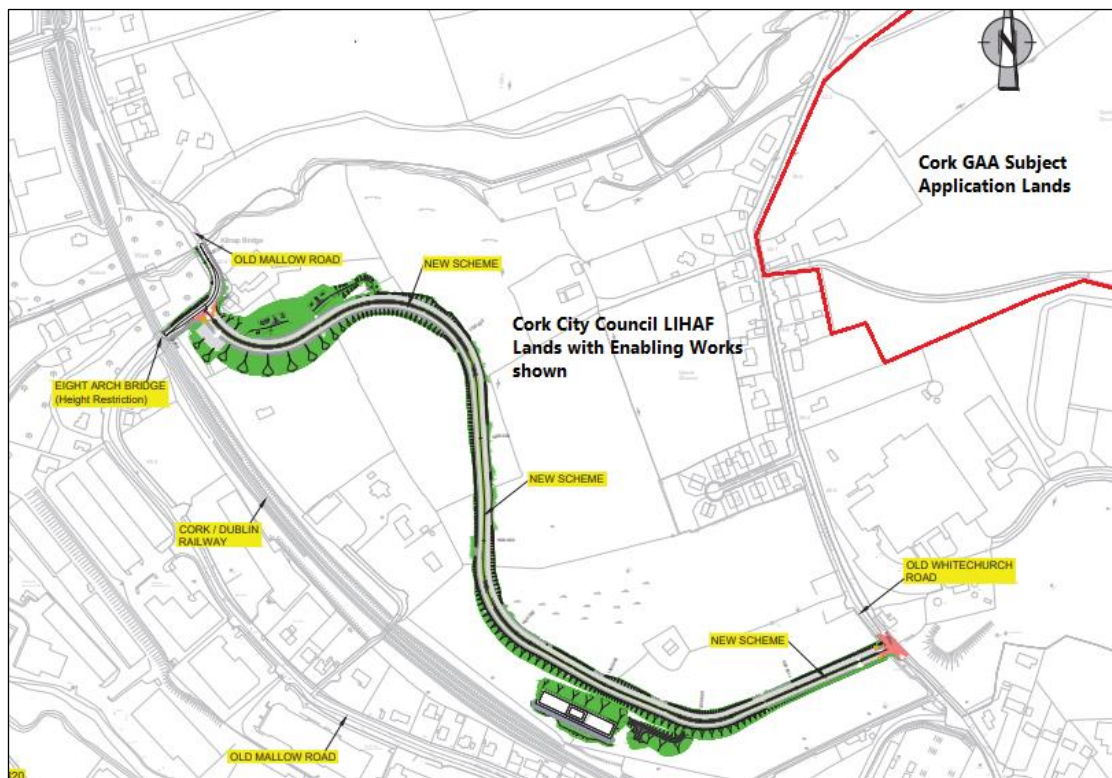


Figure 2: Subject Site (generally outlined in red) in context of adjoining Cork City Council Whitechurch Lands

Irish Water Upgrades

- 3.6 Irish Water, in partnership with Cork City Council, is currently upgrading the water network in Old Whitechurch Road, Cork City, to support future growth and development in the area.
- 3.7 The works involve the installation of approximately 340 meters of new modern pipes. The programme to replace the water mains in Old Whitechurch Road commenced in mid-June 2022. These Local Infrastructure Housing Activation Fund (LIHAF) works are being carried out as part of Irish Water's Growth and Development Programme.
- 3.8 The works will commence in land adjoining the IDA Business Park in Whitechurch between the Old Whitechurch Road and Kilbarry Cottages Road. The works will continue along the Old Whitechurch road from the entrance to the new Housing Development Scheme site southbound to the Kilbarry Electrical Substation entrance. This project is being delivered to significantly increase the capacity of the water network and provide for the delivery of future housing developments in the Kilbarry area. The works are expected to be completed by August 2022.

Land Development Agency Lands

- 3.9 Lands to the immediate east of the subject site, adjoining the GAA grounds, have recently been rezoned for residential development to facilitate the progression of plans by the Land Development Agency. The transfer of the lands from the IDA to the LDA is nearing completion.



Figure 3: Rezoned LDA Lands

4.0 PLANNING POLICY CONTEXT

- 4.1 The key provisions of national and regional planning policy as they relate to the proposed development are set out in the following sections.

Project Ireland 2040 – National Planning Framework, 2018

- 4.2 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).
- 4.3 One of the key future growth enablers for Cork outlined within the NPF includes progressing the sustainable development of new greenfield areas for housing.
- 4.4 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.
- 4.5 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.
- 4.6 NSO 7 “Enhanced Amenity and Heritage” is focused 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.
- 4.7 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.
- 4.8 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.

- 4.9 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.

4.10 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.

4.11 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.

4.12 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.

4.13 National Policy Objective 32 is as follows:

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

4.14 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.

4.15 National Policy Objective 34 states:

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

Regional Spatial and Economic Strategy for the Southern Region 2020 (RSES)

4.17 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.

4.18 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.

4.19 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.

4.20 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.

4.21 The RSES also includes a Metropolitan Area Strategic Plan (MASP) for Cork. Section 7.3 of the MASP identifies strategic residential nodes along the Metropolitan rail line, where it is noted that Kilbarry and the Old Whitechurch Road area have opportunities for significant mixed use regeneration 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.

Cork City Development Plan 2022-2028

4.22 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*.¹

4.23 Items 1 and 2 of the Board Opinion make reference to these documents. However, since this opinion was published, the Cork City Development Plan 2022-2028 was adopted on the 27th June 2022². 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.

4.24 In the Cork City Development Plan, 2022, 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

¹ Policy provisions of both Cork County Development Plan, 2014 and Cobh Municipal District Plan, 2017 included as an Appendix here

² 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.

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.

4.25 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**
 - 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.*
 - 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.

4.26 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.

4.27 Table 11.8 of the Development Plan presents the dwelling size mix for housing developments in the city suburbs

4.28 Table 11.11 of the Development Plan states that the general provision for public open space for the proposed development is 15%.

4.29 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

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

5.0 PRE-APPLICATION CONSULTATIONS

5.1 The proposed development was subject to a S247 pre-application consultation meeting with Cork City Council on 8th September 2020 via Microsoft Teams. A copy of the minutes is attached at Appendix 1 herein.

5.2 The key outcomes of this meeting, which have guided the preparation of this SHD application submission to An Bord Pleanála, are as follows:

- Primary concern is provision of North Distributor Road – flagged in recent Banduff SHD application (PL28.307373). Current status of the road proposal was set out and PA cautioned that proposal may be seen as premature pending Cork City Council's work on road.
- Stated proposed park is an important part of the application. PA provided confirmation that the approach being taken is generally acceptable.
- Works for park, in vicinity of watercourse, should be subject to AA consideration due to hydraulic link to Natura sites.
- Net versus Gross Developable Area will be determined by ABP but CCC's approach would be to use Residentially Zone Land as 'net developable area' for calculation of Density.
- Concern regarding the encroachment of apartment blocks into the NE-O-03 area and to a lesser extent of the use of land in NE-I-01 for ancillary aspects of residential development – open space and creche.
- Highlighted non-compliance with DMURS in particular as regards lengths of straight carriageways. Advised that DMURS should be incorporated into the layout.
- Praised layout with blocks of residences forming neighbourhoods. PA also requested that more thought be put into the delineation between public and private open spaces. This separation should be shown in more detail.
- Discussion regarding drainage to be offline. Requested SUDS consideration early in process.
- Some consideration of Flood Lighting from GAA pitch on residential amenity should be made.
- Application should include report demonstrating compliance with Cork County recreation and interim recreation policy.

5.3 A tripartite meeting was held with representatives of An Bord Pleanála and Cork City Council on 4th March 2022 via Microsoft Teams.

5.4 The Board issued its Opinion on 15th March 2022. which has determined that the materials submitted constitute a reasonable basis for an application. The opinion further states that:

- 1 *Further consideration of the status of the proposed development as a Strategic Housing Development, as a defined in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, having regard to the zoning objectives set out in the Cobh Municipal District Local Area Plan, 2017 relating to these lands.*

In this regard a detailed statement of consistency and planning rationale should be provided, clearly outlining how, in the prospective applicant's opinion, the proposed development is in compliance with local zoning objectives having lands zoned Public Open Space (Objective NE-O-03), and the proposed distributor road and creche on lands zones for Industry (Objective NE-I-01) in Cobh Municipal District LAP.

It should be noted that section 9(6)(b) of the Act provides that the Board shall not grant permission where the proposed development, or a part of it, contravenes materially the development plan or Local Area Plan relating to the area concerned, in relation to the zoning of the land.

This may require amendment to the documents and/or design proposals submitted.

- 2 Further consideration of the documents, and if necessary, justification for the proposed development having regard to the Medium B Residential zoning objective relating to these lands. In this regard the statement of consistency and planning rationale should clearly outline how, in the prospective applicant's opinion, the proposed development is in compliance with this local zoning objective.*
- 3 Further consideration of the documents, and if necessary, justification for the proposed development having regard to the relationship of the proposed development with, and potential impact on the selection of, the route for the proposed Cork Northern Distributor Road which is identified in the Cork Metropolitan Area Transport Strategy 2040 (CMATS), published by NTA in 2020, as a short-term objective and as a 'critical enabler' for the strategy.*
- 4 Further consideration, and possible amendment to the documents in respect of the relationship of the proposed development with the Old Whitechurch Road. Consideration should be given to the design of the junction with the proposed distributor road demonstrating that adequate sightlines can be achieved at this location. In addition, the accommodation of pedestrian / cycle movements from the development and from the public to the Old Whitechurch Road and connections to the footpath network in the area should be fully considered. This may require amendment to the documents and / design proposals submitted.*
- 5 Further consideration of the documents with regard to the internal street layout and in particular the function and design of the proposed east-west distributor route. The application documentation should demonstrate how the proposed layout, building design and streetscapes assist in place making, wayfinding as well as creating a contemporary urban development with a variety of character areas.*

Regard should be had to the guidance provided in the Design Manual for Urban Roads and Streets (DMURS) in terms of the creation of sense of place, and section 2.2.1 in particular. The Urban Design Manual- a Best Practice Guide which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) provides further guidance in this regard, including in particular criteria number 2 Connections and number 7 Layout.

6.0 THE PROPOSED DEVELOPMENT

6.1 The proposed scheme involves the development of a serviced, residentially zoned site, within Cork City, for 319no. residential dwellings comprising of:

- 85no. semi-detached units (comprising of 17no. 4-bed units and 68no. 3-bed units),
- 118no. terraced units (comprising of 8no. 4-bed units, 60no. 3-bed units and 50no. 2-bed units),
- 53no. duplex units (comprising of 26no. 1-bed units, 25no. 2-bed units and 2no. 3-bed units) and
- 63no. apartments (in 3no. part 4-storey and part 5-storey blocks and comprising 15no. 1-bed units and 48no. 2-bed units).

6.2 The development also includes the provision of a crèche facility (519sqm) as well as the provision of a riverside amenity park.



Figure 4: Proposed Site Layout (DMN Architects)

7.0 PLANNING ASSESSMENT

Housing Context

7.1 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. 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.*

7.2 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.

7.3 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.*



7.4 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.

7.5 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.

- 7.6 At a more localised level, despite the objectives in the NPF, RSES, Cork MASP, and CDP and large scale development proposals being advanced on either side of this subject site, following a review of housing completions in Cork, it is clear that the aim to provide more houses in the northside of the city is not yet being met.
- 7.7 Significant disparities remain between the north and southsides of the city. In terms of residential development, Table 1 below outlines the difference in levels of house completions in the northside and the southside areas over a 5 year period.

| No. of Houses Completions Per year | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | Total |
|------------------------------------|------------|------------|------------|------------|------------|--------------|--------------|
| Southside | 119 | 167 | 247 | 333 | 415 | 841 | 2,122 |
| Northside | 99 | 90 | 104 | 195 | 241 | 601 | 1,330 |
| Total | 218 | 257 | 351 | 528 | 656 | 1,442 | 3,452 |

Table 1 No. of House Completion in Northside and Southside of Cork City (2015-2019) (CSO.ie)

- 7.8 Having regard to this table, it is evident that the rate of growth of the southside of Cork City far exceeds the rate of housing growth in the northside, undermining the objective to rebalance development in the city as outlined in the various plans highlighted above. When areas on the southside, originally located within the county area before the city boundary expansion, are included the disparity becomes even more pronounced.
- 7.9 One reason for the limited residential development growth in the northside of the city and the North Environs more specifically is that a large proportion of the growth envisaged is directed to the Ballyvolane Urban Expansion Area, which has a significant number of ongoing infrastructural constraints. A response is found in the recently adopted Development Plan which identifies Kilbarry as a Growth Location where infrastructural constraints are not pronounced. The site is thus capable of facilitating the early delivery of a significant number of new housing units on the northside of the city.
- 7.10 It is evident that the development of the subject site for private housing, as well as social housing through the provisions of Part V, will also help further address the prevalence of social housing in the north of the city.

National and Regional Planning Policy Context

- 7.11 The strategic planning merits of this proposal lie in the site's location contiguous to the established built-up area of the designated settlement of Cork City with the benefit of proximity to existing and planned for facilities and services. The proposed development therefore represents a sustainable approach to development, entirely in accordance with national, regional, and local planning policy objectives which include the NPF's National Strategic Outcome of achieving compact urban growth.
- 7.12 As Ireland's second city, Cork is targeted by the NPF for significant population increase over the next two decades. The population growth targets for Cork are, in part, informed by the aim to achieve regional parity in the country by significantly growing the population of both the Southern Region and the Northern and Western Region over the next two decades to counterbalance the dominance of the Eastern and Midlands Region, which includes the Greater Dublin Area. Regional parity is considered necessary to address social and economic imbalances in the country.
- 7.13 One of the key future growth enablers for Cork City outlined within the National Planning Framework 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.
- 7.14 The proposal demonstrates a strong compliance with the various relevant provisions of the NPF and will:
- Deliver additional residential development within the built-up footprint of Cork City (NPO3a);
 - Deliver additional residential development within the built-up footprint, i.e. the development boundary, of Cork City (NPO3c);
 - Deliver increased population and support existing amenities, as well as providing a new 71 child creche (NPO 6);
 - Deliver additional population (c. 877no. persons) in Cork City (NPO 11);
 - Support a reduction in the use of the car in favour of walking and cycling, and enhance the use of an existing frequent public transport service, which has capacity, and support the proposed investment in public transport in the northside of the city through BusConnects (NPO 27);
 - Facilitates a diverse and social inclusive society with a mix of house and apartment types, including 64no. Part V housing units (NPO 28);
 - Will contribute to the delivery of the additional households required by 2040 (NPO 32);
 - Provides new homes in a location that supports sustainable development (NPO 33); and
 - The proposed development supports the provision of lifetime adaptable homes (NPO 34).
- 7.15 In addition, the need to achieve local parity and rebalance Cork City from a spatial, social, and economic perspective by progressing the development of the northern suburbs, including the Kilbarry area, is emphasised in local policy, and is echoed in the Cork MASP by the northside of the city is acknowledged as having the potential to accommodate significant residential yield in the Cork Metropolitan Area. This approach is further echoed in the Development Plan, which recognises the area as being a key location

for the compact consolidation and expansion of the city.

- 7.16 The proposed development is therefore of strategic importance for the social, cultural, and economic prosperity of the northern suburbs of Cork city, as well as the wider Cork Metropolitan Area generally. It also strongly aligns with NPF objectives relating to development and population growth within the existing built-up area of Cork City itself.

Immediate Development Context

- 7.17 Below we set out a more detailed consideration of the subject lands in their immediate context. This context is illustrated below. The subject lands have a number of sustainable development attributes that render them suitable for residential development. They are located adjacent two significant residential development projects at Old Whitechurch Road and Dublin Hill. In response, the recently adopted City development plan has designated the area as a key Greenfield Growth Location. The lands are therefore located within a strategic development area on the northside of the city.
- 7.18 The lands are located within a development boundary and do not represent a new extension to a settlement. They are zoned. The proposed development amounts to a more appropriate use of existing zoned land.
- 7.19 The subject lands are available for development immediately. As outlined above, their development for residential uses residential will help meet an identified and urgent need for housing. All necessary services are available on the public road and can be easily accessed. Irish Water has confirmed the feasibility of the scheme from a servicing perspective.

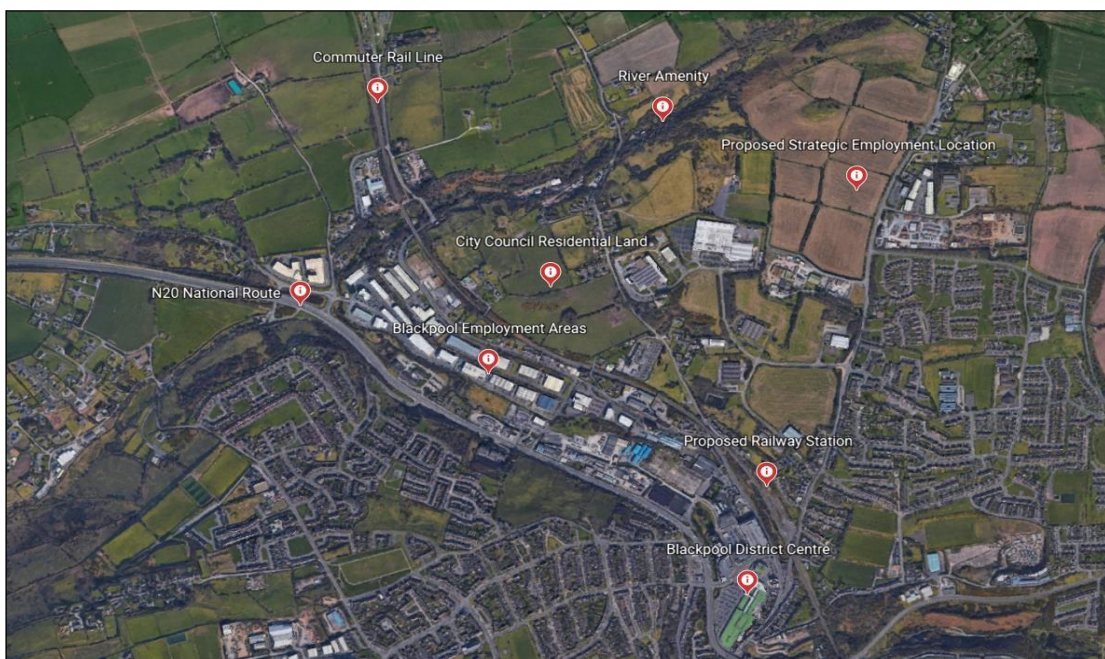


Figure 7: Site within its Local Context

Zoning and Density of Development

7.20 The site has two key 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.*
- **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.

7.21 The proposed residential development, with its new childcare facility riverside amenity park, is fully in line with the zoning objectives for the site.

7.22 The net developable area of the subject site is 8.229ha. On this basis, and considering that 319no. units are proposed, the corresponding density is 38.77units/ha.

7.23 Paragraph 3.24 of the Development Plan addresses residential density and 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.

7.24 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 set out in the Development Plan for the Inner Urban Suburb of North Blackpool is 5 storeys.

7.25 The proposed density is also in line with the *National Planning Framework*, as well as the *Urban Development and Building Height Guidelines* which promote the provision of densities in the range of 35 to 50 units per hectare for newer housing developments outside the city and town centres, and inner suburbs. In addition, the proposed density is in keeping with the guidance contained within the *Sustainable Residential Development in Urban Areas* for greenfield sites above 0.5ha in area.

Roads Infrastructure and Cork Metropolitan Area Transport Strategy (CMATS)

7.26 The **Cork Metropolitan Area Transport Strategy** (CMATS) puts forward a Cork Northern Distributor Road (CNDR) as an alternative short-term solution to the long-term objective to deliver the Cork North Ring Road. The indicative alignment of the CNDR is illustrated on various figures in the CMATS, and it is an objective that the CNDR will cater for access to planned development lands in the Northern Cork Metropolitan Area.

- 7.27 The indicative route for the proposed Northern Distributor Road is included within CMATS and extends in very close proximity to the development site. The proposed route included in CMATS is however, indicative only. Consultants were appointed by Cork City Council in 2020 to progress the planning and design of the scheme. The Strategic Assessment Report for the Northern Distributor Road is now currently being finalised. This will be followed by public consultation on the emerging preferred route.
- 7.28 In relation to this preferred route, a route for the road around the development lands and Delaney's GAA grounds was presented as part of the tripartite submission and it was confirmed by Cork City Council Infrastructure Department that it broadly represents the emerging preferred route soon to be published. None of the routes assessed pass through the GAA grounds or the development site.
- 7.29 The lead developers of the road scheme, Cork City Council, have confirmed therefore that the routes under consideration will not impact the subject site. This same approach has been taken by the City Council and accepted by the Board in the granting of permission for a number of other SHD schemes that also had the potential to be impacted by the indicative route of the Northern Distributor Road.

Proposed Open Space Provision

- 7.30 As noted above, part of the subject site is identified as being zoned Public Open Space. This equates to approximately 4.46ha of land. Within this area it is evident that there are several informal walking paths accessing the river area at the north western boundary of the site.
- 7.31 Picking up on this, it is proposed to develop a riverside amenity area adjacent the river, for use by future occupants of the subject scheme, as well as residents of the wider area thus enhancing the residential amenity of existing and future residents. The Planning Authority have welcomed this as a significant planning gain.
- 7.32 Notwithstanding the provision of an amenity park for the benefit of both future residents and the wider area, within the residential area itself, the scheme provides a wide range of other 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.
- 7.33 Taking both the active and passive open spaces provided within the entire site, there is a total of c. 7.05ha of both active and passive open space provided for, which comprises c. 45% of the total site area. A total of 18% of the overall lands are provided with active open space.

Services

- 7.34 A Services Infrastructure Report has been prepared by JB Barry and Partners. It is noted that following a Pre-Connection Enquiry, Irish Water have issued a Confirmation of Feasibility (COF) that the site can be serviced by its water infrastructure network. A Statement of Design Acceptance was also issued by Irish Water.
- 7.35 Wastewater collection will be via a network of gravity sewers for ultimate discharge to Irish Water's wastewater network on the Old Whitechurch Road immediately to the west of the site.
- 7.36 In terms of wastewater, in order to serve the proposed development and potential future development, a 150mm diameter watermain will be connected to the existing Irish Water watermain on the Whitechurch Road and extended into the development. From this proposed 150mm diameter watermain, the proposed development will be served by a network of 150mm, 100mm and 80mm diameter watermains
- 7.37 The COF confirms that upgrades to the existing water supply and wastewater infrastructure network are required to serve the full development of the site in the longer term but that the first 100 houses can be developed and serviced immediately by existing infrastructure. The COF also confirms that the upgrade works can be carried out on public roads and do not involve provision of infrastructure that would require planning approval.
- 7.38 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. A series of SuDS measures are included.
- 7.39 A site-specific Flood Risk Assessment (FRA) has been undertaken for the site. The assessment concluded that the construction of the proposed development will not result in the loss of flood plain storage, and as such will have a minimal impact on the remaining flood plain.

Residential Amenity


- 7.40 It is submitted that there are no significant negative impacts arising on the amenity of existing residents of the area. It is found that the proposed layout, through the provision of public access to a riverside amenity area, as well as greater pedestrian connectivity to the wider area, will improve the overall residential amenity of existing and future occupants of the Kilbarry/Old Whitechurch Road area.

8.0 CONCLUSION

- 8.1 The proposed development will provide much needed housing units, at an appropriate density in line with national planning policy, in an area of Cork City that has not benefited from the provision of a significantly scaled private housing development in many years.
- 8.2 In this respect, it is acknowledged that the Planning Authority welcome the proposed development of this site and the planning gain achieved through the provision of a new public park along the river.
- 8.3 The case for the development of the site is reaffirmed in its long standing zoning for residential use and the recent progression of plans for large scale residential development in its immediate vicinity – at the Old Whitechurch Road, Cork City Council are advancing plans for the construction of 600no. units, and to the immediate east where a former IDA landbank, recently rezoned for residential use, is being progressed to development by the Land Development Agency. Taken together, it is apparent why the Kilbarry area has been designated as a Target Growth area on the northside of the city in the Cork City Development Plan 2022, in line with national objectives to growth the population of the city in a sustainable manner.
- 8.4 The proposed development, in this regard will help secure the high level of objectives promoting the growth of the northside to help spatially rebalance development in the city of Cork.
- 8.5 This positive context for residential development at the site is further reinforced by the advancement of the Northern Distributor Road which is to be a key orbital public transport corridor unlocking the development potential of the city's northside.
- 8.6 The proposed development is, in this way, in the interests of those national policies promoting the sustainable development of the city and those seeking to tackle the housing crisis. In this regard, it can also be found to be in the interests of the proper planning and sustainable development of this area.
- 8.7 The applicants have addressed the matters raised by the Board and the City Council at pre application stage, so that the Board can now favourably consider a grant of planning permission for the proposed development before them. The planning case affirming this view has been set out herein.
- 8.8 The planning policy doctrine is clear on the need to support the development of zoned and serviceable sites in the right locations. A failure to develop sites such as this will sustain a demand for development in more unsustainable locations in the wider city metropolitan area.
- 8.9 There is no issue with prematurity here – the site has been zoned for an extended period and the applicants have endeavoured to progress an application for the past 2 years. The Covid pandemic and uncertainty over the Northern Distributor Road delayed matters but clarity has now been bought to this as the Planning Authority have confirmed that the route of the NDR does not restrict the development of the lands.

- 8.10 The design and layout of the proposed development has had due regard to the provisions and objectives of all relevant national, regional, and local planning policy documents, including the National Planning Framework and the Cork City Development Plan 2022. We submit that all relevant planning issues have been successfully addressed to allow the Board to reach a favourable view of the proposed development and to the extent that a grant of permission is merited in this instance
- 8.11 Overall, and having regard to the assessment herein, it is submitted that the development of the subject site for the provision of 319 no. residential units is in keeping with the proper planning and sustainable development of the area.

APPENDIX 1: COPY OF MINUTES OF S247 MEETING WITH CORK CITY COUNCIL

| | |
|--|--|
|  <p>Cork City Council Culture, Community and Placemaking Directorate Pre-Planning Record of Meeting Ref: 129/20</p> | |
| <p>Section 247 (2) of the Planning & Development Act 2000 (as amended) states <i>"the planning authority shall advise the person concerned of the (1) procedures involved in considering a planning application including any requirements of the permission regulations, and shall, as far as possible, indicate (2) the relevant objectives of the development plan which may have a bearing on the decision of the planning authority."</i></p> | |
| 1. Site Location/Site Address | Old White Church Road, Kilbarry |
| 2. Person Requesting Meeting | Sinead Kearney (Coakley O'Neill Town Planning) |
| 3. Applicant | Cork County GAA Board |
| 4. Person's Interest in Land | Owner |
| 5. Attendees | <p>MOF – Michael O'Flynn, on behalf of GAA County Board TOD – Tom O'Driscoll, on behalf of GAA County Board DC – Dave Coakley, Coakley O'Neill Town Planning SK – Sinead Kearney, Coakley O'Neill Town Planning SD – Stephen Doyle, Doyle McDonagh Nash Architects KMD – Kieran McDonagh, Doyle McDonagh Nash Architects TF – Tim Flynn, J. B Barrys & Partners RS – Ray Sheehan, J. B Barrys & Partners KM – Ken Manley, MHL & Asc.</p> <p>MD – Michelle Delaney, A/Senior Executive Planner, Development Management MF - Martina Foley, Executive Planner, Development Management VD – Valerie Fenton, A/Senior Executive Engineer, Development Management LC – Liam Casey, Parks Superintendent KOC – Kevin O'Connor, Senior Planner, Policy TD – Tony Duggan, City Architect JC – James Culhane, Executive Engineer, Traffic Operations SL – Simon Lyons, Senior Executive Engineer, Drainage KMG – Kevin McGill, Assistant Engineer, Environment BOF – Brian O'Flynn, Senior Executive Engineer, Infrastructure GK – Gavin Kelly, Area Engineer</p> |
| 6. Meeting Details | 08/09/2020 at 11am using Microsoft Teams |
| DOCUMENTATION SUBMITTED | |
| Yes / No | Site Location Map, Draft Plans, Draft Reports etc. |
| BRIEF DESCRIPTION OF DEVELOPMENT/PROPOSAL | |
| Strategic Housing Development consisting of the development of 309 No. residential units, a creche and public park | |

NOTES FROM MEETING**DESIGN TEAM PRESENTATION**

DC Introduced proposal with detail provided by architects SD and KMD

- DM – Site described site and planning context
- SD – Introduction to site layout design and concept
- KMD – Set out landscaping strategy and answered queries regarding proposed park

FEEDBACK FROM CORK CITY COUNCIL

- MF – Primary concern is provision of North Distributor road – flagged in recent Banduff SHD application (PL28.307373) is also of concern here. BOF set out current status of the road proposal and cautioned that proposal may be seen as premature pending Cork City Council's work on road. MOF and DC requested accommodation for proposed development. MF reminded participants that ABP is the deciding authority and that additional discussion can proceed separately.
- MF – Stated proposed park is an important part of the application. LC provided confirmation that the approach being taken is generally acceptable.
- MF – Works for park, in vicinity of watercourse, should be subject to AA consideration due to hydraulic link to Natura sites.
- MF – Planning Context discussed.
 - Net versus Gross Developable Area will be determined by ABP but CCC's approach would be to use Residentially Zone Land as 'net developable area' for calculation of Density.
 - Concern regarding the encroachment of apartment blocks into the NE-O-03 area and to a lesser extent of the use of land in NE-I-01 for ancillary aspects of residential development – open space and creche.
- VF – Highlighted current non-compliance with DMURS in particular as regards lengths of straight carriageways. Advised that DMURS should be incorporated into the layout.
- TD – Praised layout with blocks of residences forming neighbourhoods. He also requested that more thought be put into the delineation between public and private open spaces. This separation should be shown in more detail.
- SL – Discussion regarding drainage to be offline. Requested SUDS consideration early in process.
- KMG – Some consideration of Flood Lighting from GAA pitch on residential amenity should be made.
- MD – Application should include report demonstrating compliance with Cork County recreation and interim recreation policy

| ISSUED BY | SIGNATURE | DATE |
|--|---|------------|
| Martina Foley, EP, Cork City Council. |  | 16/09/2020 |

The applicant is advised in accordance with Section 247 (3) of the Planning and Development Act 2000 (as amended), that "the carrying out of any consultations shall not prejudice the performance by a Planning Authority of any other of its functions under this Act, or any regulations made under this Act & cannot be relied upon in the formal planning process or in legal proceedings".