



COAKLEY O'NEILL
town planning

Statement of Response to An Bord Pleanála Opinion
in respect of the proposed
Kilbarry SHD, 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 Pre-application consultation under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (Case Reference ABP-311924-21) took place on 4th March 2022 between the Cork County GAA Board ('the applicant'), An Bord Pleanála ('the Board') and Cork City Council. This occurred remotely via Microsoft Teams in relation to a proposed Strategic Housing Development at the Cork GAA lands, Old Whitechurch Road, Kilbarry, Cork.

1.2 The Board's Notice of Pre-Application Consultation Opinion (hereafter referred to as 'the opinion') was issued on 25th March, 2022 and is enclosed as at Appendix 1 to this Statement of Response.

1.3 The opinion from the Board stated that *'the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.'*

1.4 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.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. *A report addressing the matters raised in the report of the Urban Road and Street Design Section of Cork County Council. In addition, the application should be accompanied by the following:*
 - (a) *A Travel Plan / Mobility management plan, including details of connectivity and accessibility for future residents to Public Transport services.*
 - (b) *A Quality Audit in accordance with Advice Note 4 of DMURS, to include a detailed Road Safety Audit.*
 - (c) *A review of the location of the proposed childcare facility to the south of the proposed distributor route and its accessibility for residents of the proposed development.*
2. *In respect of soils and excavation:*
 - (a) *An assessment and statement of the potential for the presence of contaminated soils/ materials on the site and a method statement for the resolution of these matters, where appropriate.*

- (b) *An assessment of the extent of cut and fill required across the site and a method statement for and rock breaking activity.*
3. *Detailed section drawings through the lands describing the relationship between the proposed development and adjoining residential properties (existing and permitted) and with the Old Whitechurch Road, and the treatment of existing slopes across the site. Such drawings should clearly identify and illustrate the extent of cut and fill required to facilitate the development.*
 4. *An assessment of the landscape and visual impacts of the development. Such assessment shall, inter alia, identify and assess impacts on views from the Old Whitechurch Road, west of the Bride River, and impact on the landscape and visual character of works and tree removal along the roadside boundary.*
 5. *A tree survey and Arboricultural Impact Assessment, having regard, inter alia, to proposed works along the boundary with Old Whitechurch Road.*
 6. *The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008- 'Lighting for Buildings- Part 2: Code of Practice for Daylighting'.*

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or qualified.

7. *A phasing plan for the proposed development, which should include detail regarding the delivery of associated road and drainage infrastructure and public open spaces.*
8. *Site layout plans clearly identifying the areas intended to be taken in charge by the local authority. Specific proposals should be provided for the management of drainage / attenuation infrastructure associated with the proposed development located within the public park.*
9. *A response to the issues raised in the report of the planning authority in relation to Residential Amenity and House Design. Drawings clearly demonstrate that a satisfactory standard of private residential amenity space is provided for each unit, with particular regard to the quality of provision to corner units in duplex blocks.*
10. *A review of the relationship of the proposed development with the adjoining sports grounds and associated lands, in order to deliver high levels of residential amenity. Matters to be considered include the layout of housing units backing onto areas of open space and car parking and the potential for improved outlook for proposed dwellings*

11. *A report that specifically addresses the proposed materials and finishes to the scheme, including specific detailing of external finishes, landscaping and paving, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.*
12. *A Building Lifecycle Report in accordance with section 6. 13 of the Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider external materials on all elevations. The report shall also address the management and maintenance of public spaces and access routes to the development.*
13. *A statement as to how the proposed Strategic Housing Development has sought to comply with the principals of Universal Design (to encourage access and use of the development regardless of age, size, ability or disability).*
14. *The application should confirm that all the screening assessments have taken account of the full scope of works required facilitate the proposed development.*
15. *In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan or local area plan in place, or likely to be in place, at the date of the decision of the Board in respect of any application for permission under 4 section of the Act.*

The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. *National Transport Authority (NTA)*
2. *Cork City Childcare Committee.*
3. *Irish Water*
4. *An Taisce — the National Trust for Ireland*
5. *The Heritage Council*
6. *The Minister for Housing, Local Government and Heritage*
7. *Inland Fisheries Ireland*

- 1.5 This report sets out the applicants' response to the Board's opinion. Section 2 sets out how the applicants propose to respond to the items raised by the Board in its opinion.

2.0 STATEMENT OF RESPONSE TO ITEMS RAISED

2.1 This section sets out how the applicant proposes to address the 18no. specific items raised by the Board in its opinion, as follows:

Main Item No. 1 – Status of the proposed development as a strategic housing development

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.

A Statement of Consistency and Planning Report have been prepared by Coakley O'Neill Town Planning Ltd. and are submitted with the planning application. They note that since the issuing of the Board's opinion, the new Cork City Development Plan, 2022-2028 has been adopted and will form the basis of the Board's decision on this application. This Development Plan has changed the zoning of the site, which now reflects the proposal put forward. As such, the application is being made on lands primarily zoned for residential use. The inclusion of open space zoned lands to provide a public park to serve the residential areas is appropriate and has been common practice in SHD applications. Recent examples (confined only to Cork City) are set out below.

- **Banduff Road, Ref: ABP-307373-20** – southern part of the site zoned public open space included within application site.
- **Longview, Ref: ABP-306325-20** – part of lands zoned NE-O-04 for open space for public recreation as an urban park included within application site.
- **Tedcastles, Ref: TA28.313277** – northern part of the lands zoned as ZO14 public open space, western side zoned for neighbourhood retail centre, both included within application site.
- **Marina Quarter, Ref: TA28.309059** – eastern portion of the lands zoned public open space, to form part of Marina Park, included within application site.
- **Jacobs island, Ref: ABP-301991-18** The linear part of the site adjacent to Lough Mahon zoned ZO 14 Public Open Space included within application site, as were other areas separately zoned.

- **Maglin Road, Ballincollig ABP-308111-20** part of site zoned as BG-0-06 for provision of open space and recreation park, included within application site.

In these examples the Board found the applications to be in accordance with the relevant provisions set out as the lands were primarily zoned for residential uses, as is the case in this instance.

No material contravention of the statutory Development Plan zoning occurs in this instance. The Planning Authority supported this view at pre-application consultation stage and subsequently the lands have been rezoned to reflect the proposal put forward. Residential development is confined to the lands zoned for such uses. Open space zoned land is to be developed as a public park and road upgrading works on lands along the existing access road and at Delaney's car park are in keeping with the sports and residential zoning objectives there.

Main Item No. 2 – Compliance with the local zoning objective

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.*

As above, since the issuing of the Board's opinion the new Cork City Development Plan, 2022-2028 has been adopted and will form the basis of the Board's decision on this application. The former Medium B density objective no longer applies to the subject lands. A Statement of Consistency and Planning Report have been prepared by Coakley O'Neill Town Planning Ltd. and are submitted with the planning application.

Main Item No. 3 – Proposed Northern Distributor Road

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.*

The 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.

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. The lead developers of the road scheme, Cork City Council, have confirmed therefore that the routes under consideration will not impact on 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.

Main Item No. 4 – Old Whitechurch Road

- 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.*

Sightlines at the Old Whitechurch Road entrance will be provided in accordance with DMURS. The Old Whitechurch Road here is within a 50kmh speed limit and therefore a design speed of 60kmh applies. In accordance with section 4.4.4 of DMURS, sightlines of 59 meters are required. See Drawing No. 19215-JBB-00-XX-DR-C-05001 prepared by JB Barry Consulting Engineers, for sightlines at the junction.

A Mobility Management Plan and a Traffic and Transportation Assessment, prepared by MHL Consulting Engineers, have been prepared and are submitted with the application. they set out the key measures to enhance pedestrian and cycle movements from the development and from the public to Old Whitechurch Road as well as connections to the footpath network in the area.

Main Item No. 5 – Internal Street Layout

- 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.

The proposed layout has a clear hierarchy of roads within the scheme. A new link road connecting from the entrance off the Old Whitechurch Road continues through the southern portion of the site to form an east west link to connect to the Delaney's GAA pitch and its access road which affords connection from the development to Dublin Hill. This takes the route of the former roadway through the site and mirrors

the route of the road objective that was set out in the Cobh MD LAP, 2017. It will provide connectivity between the large City Council residential development lands at Old Whitechurch Road to the proposed orbital public transport corridor along the Northern Distributor Road and also connectivity on to the proposed Blackpool rail station. In this respect, it will provide an important function in improving permeability through the urban area and enhancing connectivity for new populations in this area to future public transport nodes.

Alternative routes for the proposed roadway through the site were considered but were deemed to have a greater impact upon the amenity of residents. On this basis, a route along the southern boundary was favoured, essentially creating a buffer between the residential areas and the adjoining industrial estate to the south.

This road is tree lined with development in the form of 3 storey duplex housing, a creche and wide terraced housing fronting the road. The duplex units and creche, which have their parking either behind or to the side of the buildings, are pushed out to front the road, creating a more urban form along this road. The road is 6m wide with a verge of 1m to both sides and a combined 3m wide pedestrian and cycle path.

The Design Manual for Urban Roads and Streets informs the design of this roadway and the wider street network within the scheme. This is set out in the DMURS Compliance Statement and Architectural Design Statement, prepared by DMN Architects, and submitted with the planning application. They 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.

- 2.2 A response to the additional information requested under Article 285(5)(b) of the Regulations is provided under Items 1 to 7 below.

Item No. 1 – Report of the Urban Road and Street Design Section of Cork County Council

1. *A report addressing the matters raised in the report of the Urban Road and Street Design Section of Cork County Council. In addition, the application should be accompanied by the following:*
 - (a) *A Travel Plan / Mobility management plan, including details of connectivity and accessibility for future residents to Public Transport services.*
 - (b) *A Quality Audit in accordance with Advice Note 4 of DMURS, to include a detailed Road Safety Audit.*
 - (c) *A review of the location of the proposed childcare facility to the south of the proposed distributor route and its accessibility for residents of the proposed development.*

A DMURS Compliance Statement, an Architects Design Statement, Road Safety Audit, and a Mobility Management Plan, addressing these items, have been prepared and are submitted with the application

The design of the public plaza at the creche creates a pedestrian friendly urban space on the link road through raised table, surface finishes and site layout. This will facilitate safe pedestrian crossing points to the creche.

The proposed creche location is at a key junction on the cycle and pedestrian network where the east-west route along the link road meets the northern route to the public park. This means that the location of the creche makes it easily accessible to areas outside the site so that it can be used by both the residents of the scheme itself as well as neighbouring areas.

Item No. 2 – Soils and Excavation

2. *In respect of soils and excavation:*

- (a) *An assessment and statement of the potential for the presence of contaminated soils/ materials on the site and a method statement for the resolution of these matters, where appropriate.*
- (b) *An assessment of the extent of cut and fill required across the site and a method statement for and rock breaking activity.*

Verde Consulting Engineers has completed a comprehensive review of available soil analysis associated with environmental sampling completed at a site at Kilbarry where material has been previously deposited. This is titled '*Review of Available Ground Investigation Data for proposed Housing Development on Lands at Kilbarry, Co. Cork*', addresses these matters, and is submitted with the application.

JB Barrys have prepared a Construction and Environmental Management Plan and an Engineering Services Report both of which address these items.

Item No. 3 – Adjoining Residential Properties

3. *Detailed section drawings through the lands describing the relationship between the proposed development and adjoining residential properties (existing and permitted) and with the Old Whitechurch Road, and the treatment of existing slopes across the site. Such drawings should clearly identify and illustrate the extent of cut and fill required to facilitate the development.*

A number of section drawings have been prepared describing the relationship of the proposed development with areas adjoining and are submitted with the planning application. Please refer to the detailed section drawings (Drawing Refs. 19012-1100, 19012-1101, 19012-1102, 19012-1103, 19012-1104, 19012-1105), which describe the relationship between the proposed development and adjoining residential properties and with the Old Whitechurch Road, and the treatment of existing slopes across the site. These drawings also identify and illustrate the extent of cut and fill required to facilitate the development.

Item No. 4 – Landscape & Visual Impact

4. *An assessment of the landscape and visual impacts of the development. Such assessment shall, inter alia, identify and assess impacts on views from the Old Whitechurch Road, west of the Bride River, and impact on the landscape and visual character of works and tree removal along the roadside boundary.*

An assessment of the landscape and visual impacts of the development has been prepared and is included in the planning application. It assesses viewpoints from the Old Whitechurch Road and west of the Bride River.

Item No. 5 – Tree Survey

5. *A tree survey and Arboricultural Impact Assessment, having regard, inter alia, to proposed works along the boundary with Old Whitechurch Road.*

A Tree Survey and Arboricultural Impact Assessment has been prepared and is submitted with the planning application. It has had regard to the proposed works along the boundary at Old Whitechurch Road.

Item No. 6 – Daylight and Sunlight Assessment

6. *The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008- 'Lighting for Buildings- Part 2: Code of Practice for Daylighting'.*

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or qualified.

A comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties has been prepared and is submitted with the application.

It has had regard to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008- 'Lighting for Buildings- Part 2: Code of Practice for Daylighting'.

Item No. 7 – Phasing Plan

7. *A phasing plan for the proposed development, which should include detail regarding the delivery of associated road and drainage infrastructure and public open spaces.*

A Phasing Plan (Drawing Ref. 19012-1007-1-PA) is provided by DMN Architects and forms part of this application. The detailed sequencing of phasing is set out in the accompanying Construction Environmental Management Plan prepared by JB Barry Engineers.

Item No. 8 – Taking in Charge

8. *Site layout plans clearly identifying the areas intended to be taken in charge by the local authority. Specific proposals should be provided for the management of drainage / attenuation infrastructure associated with the proposed development located within the public park.*

A Taking in Charge Layout (Drawing Ref. 19012-1009-1-PA) is provided by DMN Architects and forms part of this application.

Item No. 9 – Residential Amenity and House Design

9. *A response to the issues raised in the report of the planning authority in relation to Residential Amenity and House Design. Drawings clearly demonstrate that a satisfactory standard of private residential amenity space is provided for each unit, with particular regard to the quality of provision to corner units in duplex blocks.*

An Architectural Design Statement, prepared by DMN Architects, is submitted with the application addressing the issues raised in the report of the planning authority in relation to residential amenity and house design. The submitted architectural drawings and Housing Quality Assessment clearly demonstrate that a satisfactory standard of private residential amenity space is provided for each unit.

Item No. 10 – Adjoining Sports Grounds

10. *A review of the relationship of the proposed development with the adjoining sports grounds and associated lands, in order to deliver high levels of residential amenity. Matters to be considered include the layout of housing units backing onto areas of open space and car parking and the potential for improved outlook for proposed dwellings*

A review of this relationship was carried out in order to deliver high levels of residential amenity and a number of changes have been made. There are varying boundary conditions along the site's boundary with Delaney's GAA club. To the south of this boundary the site is open to the existing carpark for Delaney's GAA grounds with palisade fencing. To the north of the clubhouse however the boundary changes with a mix of blockwork walls to a ball alley and a line of large existing trees contained within the Delaney's GAA

grounds to the north of this. The floodlighting at the GAA grounds is at the training area and provides low level localised lighting that does not spill into proposed residential areas.

The design of the development along this boundary responds differently to the changing boundary conditions. Along the southern portion of the GAA grounds the development has been turned to face the boundary to assist in passive surveillance of the GAA facilities and to create an appropriate entrance to the development as you travel west along the link road from Dublin Hill. Where sides of houses face the carpark these are designed as dual fronted houses. Two possible future access points from the housing development have been allowed for within the design subject to agreement with Delaney's GAA club which can assist in integrating the GAA club and its amenity resource into both the development and by extension the wider area. Further north along the boundary with the GAA club, due to the existing trees and overgrown nature of the lands as well as the existing ball alley the design backs onto this area of the site.

Item No. 11 – Materials and Finishes

- 11. A report that specifically addresses the proposed materials and finishes to the scheme, including specific detailing of external finishes, landscaping and paving, pathways, entrances, and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.*

An Architectural Design Statement, prepared by DMN Architects, details proposed materials and finishes to the scheme. It also sets out details of external finishes, landscaping and paving, pathways, entrances, and boundary treatments.

Item No. 12 – Building Lifecycle

- 12. A Building Lifecycle Report in accordance with section 6. 13 of the Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider external materials on all elevations. The report shall also address the management and maintenance of public spaces and access routes to the development.*

A Building Lifecycle Report has been prepared by DMN Architects and is submitted with the planning application.

Item No. 13 – Universal Design

- 13. A statement as to how the proposed Strategic Housing Development has sought to comply with the principals of Universal Design (to encourage access and use of the development regardless of age, size, ability, or disability).*

A Universal Design Statement has been prepared by DMN Architects and is submitted with the planning application.

Item No. 14 – Screening Assessments

14. *The application should confirm that all the screening assessments have taken account of the full scope of works required facilitate the proposed development.*

The screening assessments undertaken have taken account of the full scope of works required facilitate the proposed development. This is detailed in the submitted Environmental Impact Assessment Report, Natura Impact Assessment and other reports and assessments included in the planning application.

Item No. 15 – Statement of Compliance and Article 299

15. *In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan or local area plan in place, or likely to be in place, at the date of the decision of the Board in respect of any application for permission under 4 section of the Act.*

The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

A Statement of Consistency with the Cork City Development Plan 2022-2028 has been prepared and is submitted with the application. This plan has been adopted by the Local Authority and will form the basis of the Board's decision on this planning application.

As an Environmental Impact Assessment Report has been prepared and is submitted with the planning application, there is no requirement for the information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018

Notification of Statutory Bodies

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

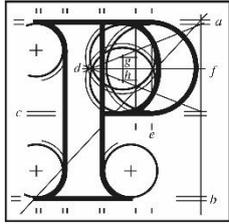
1. *National Transport Authority (NTA)*
2. *Cork City Childcare Committee.*
3. *Irish Water*
4. *An Taisce — the National Trust for Ireland*
5. *The Heritage Council*
6. *The Minister for Housing, Local Government and Heritage*
7. *Inland Fisheries Ireland*

The prospective applicants have notified the following authorities of the making of the SHD application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

3.0 CONCLUSION

- 3.1 This document sets out a response by the applicants and their design team to the matters outlined in the Board's opinion on a proposed strategic housing development at the Cork GAA lands, Old Whitechurch Road, Kilbarry, Cork.
- 3.2 It is respectfully submitted that all the issues raised in the Board's opinion has been substantially and comprehensively addressed in the application now before the Board.

Appendix 1 Board Opinion



An
Bord
Pleanála

Case Reference:
ABP-311924-21

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: Demolition of buildings, construction of 309 no. residential units (197 no. houses, 112 no. apartments), creche and associated site works. Cork GAA Lands, Old Whitechurch Road, Kilbarry, Cork City.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Further consideration of the status of the proposed development as a Strategic Housing Development, as 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 specific regard to the location of elements of this residential development within lands zoned Public Open Space (Objective NE-O-03), and the proposed distributor road and creche on lands zoned for Industry (Objective NE-I-01) in the 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 park 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 / or 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 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*.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A report addressing the matters raised in the report of the Urban Road and Street Design Section of Cork County Council. In addition, the application should be accompanied by the following:
 - (a) A Travel Plan / Mobility management plan, including details of connectivity and accessibility for future residents to Public Transport services.

- (b) A Quality Audit in accordance with Advice Note 4 of DMURS, to include a detailed Road Safety Audit.
 - (c) A review of the location of the proposed childcare facility to the south of the proposed distributor route and its accessibility for residents of the proposed development.
- 2. In respect of soils and excavation:
 - (a) An assessment and statement of the potential for the presence of contaminated soils / materials on the site and a method statement for the resolution of these matters, where appropriate.
 - (b) An assessment of the extent of cut and fill required across the site and a method statement for any rock breaking activity.
- 3. Detailed section drawings through the lands describing the relationship between the proposed development and adjoining residential properties (existing and permitted) and with the Old Whitechurch Road, and the treatment of existing slopes across the site. Such drawings should clearly identify and illustrate the extent of cut and fill required to facilitate the development.
- 4. An assessment of the landscape and visual impacts of the development. Such assessment shall, inter alia, identify and assess impacts on views from the Old Whitechurch Road, west of the Bride River, and the impact on the landscape and visual character of works and tree removal along the roadside boundary.
- 5. A tree survey and Arboricultural Impact Assessment, having regard, inter alia, to proposed works along the boundary with Old Whitechurch Road.
- 6. The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties. In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or quantified.

7. A phasing plan for the proposed development, which should include detail regarding the delivery of associated road and drainage infrastructure and public open spaces.
8. Site layout plans clearly identifying the areas intended to be taken in charge by the local authority. Specific proposals should be provided for the management of drainage / attenuation infrastructure associated with the proposed development located within the public park.
9. A response to the issues raised in the report of the planning authority in relation to Residential Amenity and House Design. Drawings clearly should clearly demonstrate that a satisfactory standard of private residential amenity space is provided for each unit, with particular regard to the quality of provision to corner units in duplex blocks.
10. A review of the relationship of the proposed development with the adjoining sports grounds and associated lands, in order to deliver high levels of residential amenity. Matters to be considered include the layout of housing units backing onto areas of open space and car parking and the potential for improved outlook for proposed dwellings.
11. A report that specifically addresses the proposed materials and finishes to the scheme, including specific detailing of external finishes, landscaping and paving, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.
12. A Building Lifecycle Report in accordance with section 6.13 of the Sustainable Urban Housing, Design Standards for New Apartments, Guidelines for Planning Authorities (2020) guidelines which should consider external materials on all elevations. The report shall also address the management and maintenance of public spaces and access routes to the development.

13. A statement as to how the proposed Strategic Housing Development has sought to comply with the principles of Universal Design (to encourage access and use of the development regardless of age, size, ability or disability).
14. The application should confirm that all screening assessments have taken account of the full scope of works required to facilitate the proposed development.
15. In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place, or likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.

The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

1. National Transport Authority
2. Cork City Childcare Committee
3. Irish Water
4. An Taisce
5. Heritage Council
6. Minister for Housing, Local Government and Heritage
7. Inland Fisheries Ireland

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Stephen O'Sullivan
Assistant Director of Planning
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