

CUNNANE STRATTON REYNOLDS

CSR Ref: 96601/EMP/011021

Forward Planning,
Planning Department,
Cork City Council,
City Hall,
Anglesea Street,
Cork

4th October 2021

Submission Through the Consultation Portal

Dear Sir/Madam,

Submission on the Draft Cork City Development Plan 2022-2028 on Behalf of Speardale Developments in Respect of Lands at Commons Road, Cork City.

Dear Sir/Madam,

This submission to the Draft Cork City Development Plan 2022-2028 has been prepared by Cunnane Stratton Reynolds in accordance with section 12(2)(b) of the Planning and Development Act 2000, as amended.

This submission is made on behalf of our client, Speardale Limited, and relates to their lands adjacent to The Commons Inn, Commons Road, Cork which forms part of Cork City administrative area.

Our client's principal concern is that potential for height and increased density is maximised so that the development potential of the city articulated in ambitious public transport enhancements set out in CMATS and the key objectives of the vision statement set out in the emerging plan are reached.

The overall aim of the emerging Plan is to *'reach a population of over 210,000 with ambitious growth targets over the next 20 years, Cork City is an emerging international centre of scale and a national driver of economic and population growth.'*

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Urban Development and Building Heights 2018

The Urban Development and Building Height Guidelines effectively mandate planning authorities to maximise height and density.

Para 1.2 states:

'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.'

The key words above are 'significant increases'. Whilst one should consider prevailing height as a material consideration in determining suitable and appropriate heights the Guidelines emphasise that the ultimate test of appropriateness of building height is the impact that it is likely to have.

Figure 2.2 states:

'The development plan must include the positive disposition towards appropriate assessment criteria that will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development.' Underlining is our emphasis).

We would emphasise the phrase 'positive disposition'.

These guidelines contain Specific Planning Policy Requirements (SPPRs). SPPRs are policy objectives which are statutorily enshrined as overriding any specific local or county-based objectives. All development plan policies and objectives must be in accordance with these SPPRs. SPPR 1 encourages taller buildings where adverse environmental impacts can be avoided, which we believe can be achieved within along Commons Road and further along the N20 than is currently indicated in the Draft Plan.

'SPPR 1

In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.'

The guidelines emphasise the use of quality-based criteria such as access, light and microclimate along with site context and impact to determine maximum appropriate heights. In the context of the subject site the protection of the heritage buildings and their settings will be a key quality criteria for assessing the height and density of any proposed development.

The City Council's Density, Building Height and Tall buildings Study (2021).

Topography is identified as a 'sensitivity' or constraint on page 86 of this guidance document. It neglects to identify that topography can provide opportunities for acceptable and appropriate taller structures.

The Spatial Density Strategy and Suitable Areas visual on page 76 would not appear to have been extended appropriately in the emerging plans Figure 3.3 and we would request that this anomaly be corrected in the emerging plan.

The Draft City Development Plan

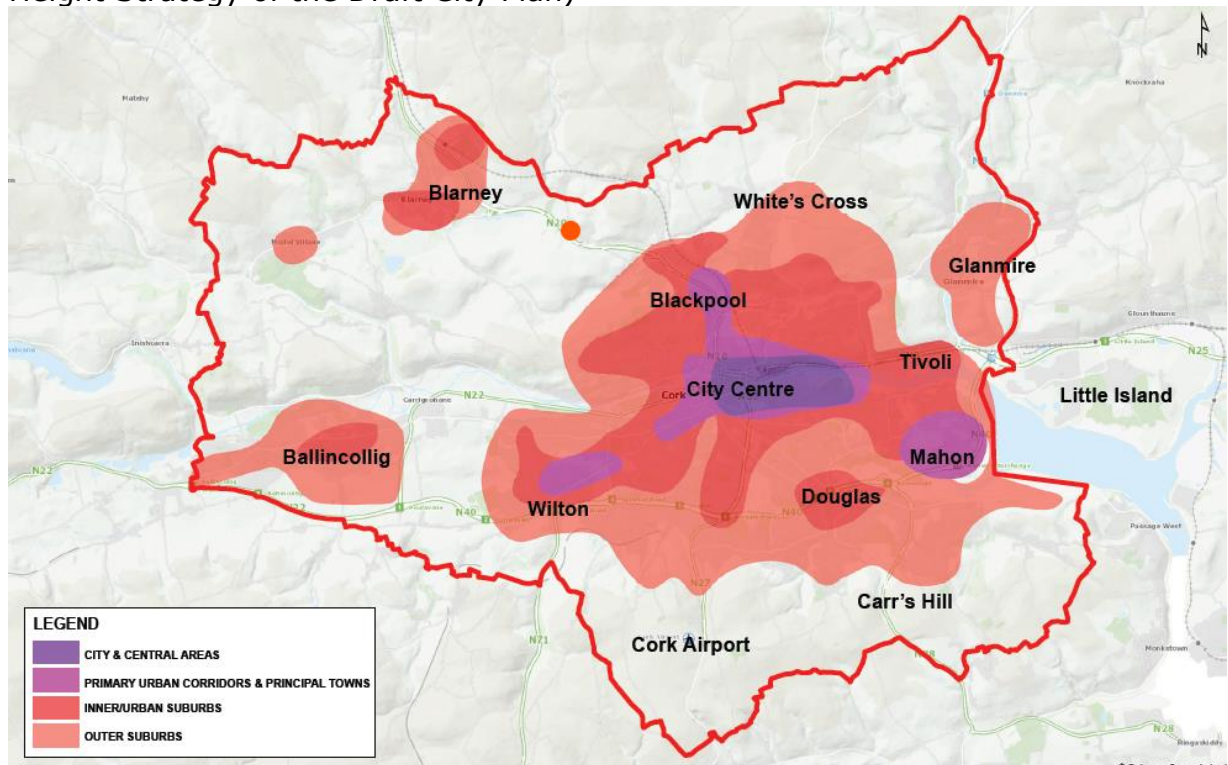
We request that Para 11.51 be amended to allow for circumstances such as appropriate topography to facilitate taller buildings. Para 11.51 currently states:

'Tall buildings should only be developed in suitable locations identified in the development plan. Tall building proposals outside of the locations specified are not generally considered to be appropriate as they would likely conflict with the overall building height strategy for Cork.'

In terms of what may be considered appropriate we would ask that landform and topography be mentioned specifically as being considered in deliberations on height consistent with the City Council's Density, Building Height and Tall buildings Study (2021).

We also request that the extent of the urban corridor along the N20 be extended further northwards to reflect the fact that there are considerable regeneration opportunities along the N20 corridor. Please see below Figure 1 showing the extent that we believe the suggested density and height corridor can be extended to include our clients site at the Commons Inn.

Figure 1: Density and Height (Taken from Figure 3.3: Spatial Density and Building Height Strategy of the Draft City Plan)



The N20 is one of the primary urban or development corridors in the city and a main point of entry into the city. The landscape character of the area changes, we believe from rural to urban at the DHL plant and we believe that this important corridor should be extended further. In essence the lilac colouring of Figure 1 above should be extended northwards to and just beyond the red dot. We would additionally point out that this location is a river valley with a very significant drop in levels to the river basin further offering opportunities for taller buildings. The area is one of change and there are objectives in the emerging plan for a river walk and the enhancement of open space in the area further offering opportunities for taller buildings. The protected views LT24A (eastwards) and LT24B (westwards) are likely to be enhanced in what is a very urbanised environment and taller buildings, mindful of the river basin location, are likely to accentuate and enhance rather than detract from these aforementioned protected views.

This area already benefits from extensive bus provision being one of the main routes into the city and potential exists for enhanced pedestrian and cycle access to Blackpool rail station which is within easy walking or cycling distance to our client's site.

Our client's site is one of the landmark sites on one of the main transport corridors into the city linking the major metropolitan areas of Cork and Limerick. This is a location where taller buildings should be encouraged as per the Ministerial Guidelines on Height.

The lilac coloured area in Figure 1 above should be extended to more fully cover an emerging and increasingly more important public transport corridor signified by ongoing discussions between the National Transport Authority and Iarnrod Eireann on the proposed rail station at Kilbarry further north. We are also aware that there is to be a planned expansion of rail facilities at Stoneview as part of enhanced rail provision within the Cork Metropolitan area and our client's site is well located within the context of those enhancements.

The references to height above equally apply to density also and it is noted that Figure 3.3 of the emerging plan is a joint height and density strategy.

We trust that you will consider the above in your deliberations on the above and we await acknowledgement of safe receipt.

Yours sincerely,



Eamonn Prenter MIPI MRTPI
Director
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