

Response to LRD Opinion

LARGE-SCALE RESIDENTIAL DEVELOPMENT

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) AT SARSFIELD ROAD, WILTON, CORK CITY



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1.0 INTRODUCTION

This *LRD Opinion* response aims to address each issue and item raised in the 'Large Scale Residential Development Opinion' ('LRD Opinion') issued by Cork City Council on 25th October 2024. This follows the LRD Meeting held on the 27th of September 2024, regarding the proposed development which comprises 348 no. residential units located at Sarsfield Road, Wilton, Cork City (refer to the enclosed Site Location Plan prepared by Reddy Architecture + Urbanism).

This *Response to LRD Opinion* report makes references to additional documentation that is included in the LRD application pack and to the relevant information in the application documentation in order to show that the issues raised in the CCC's LRD Opinion have been fully and satisfactorily addressed as part of the subject application.

Importantly, the LRD Opinion included the following:

"It is recommended that the Planning Authority serve a notice on prospective applicant, pursuant to Section 32D of the Planning Authority Act 2000 (as amended), stating that it is of the opinion that the documentation submitted with the consultation request under Section 32B of the Planning and Development Act 2002 (as amended) requires further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD".

In our opinion, each of the 28 No. items included in the LRD Opinion have been comprehensively addressed, as detailed in the response statement below. This response document should be reviewed in conjunction with the accompanying supporting information prepared by the Design Team and other suitably qualified consultants, as cross-referenced throughout the statement below.

A *Planning Report / Statement of Consistency* that demonstrates the extent of consistency with the pertinent *Development Plan* (the *Cork City Development Plan 2022-2028*) and the relevant Section 28 National Guidelines, as required, has been prepared by Tom Phillips + Associates ('TPA'). This document should also be read in conjunction with this response.

A number of other documents submitted with the LRD Meeting Request have been updated, and additional information has been included in this planning application as prescribed by the LRD Opinion and the *Cork City Development Plan 2022-2028* ('*Development Plan*'). These updates respond to the LRD Opinion, ensuring that the Planning Authority has all the necessary information to make a well-informed decision on the proposed development. Each item is individually assessed overleaf.

2.0 STATEMENT OF RESPONSE TO ISSUES RAISED IN CCC'S LRD OPINION

2.1 Item No. 1 (a)

Item No. 1 (a) states:

"Further consideration of and possible amendment of the development in terms of the height of the development and its potential visual impact. In this regard you are requested to note that under Paragraphs 11.45 and 11.46 of the Cork City Development Plan 2022-2028 a Tall Building is defined as buildings above 18m/6 residential storeys, Paragraph 11.51 and 11.52 of the Plan should also be noted in this regard as well as the site's location outside of the 'City Fringe, Primary Corridors and Major Urban Centre' as defined in the Density and Heights Map 08 in Volume 2 of the Plan. It should also be noted that planning applications for Tall Buildings guided by detailed guidance within the Plan (see Paragraphs 11.59 in particular and 11.53 – 11.60)".

Response

In response to the above, Reddy Architecture + Urbanism has prepared an updated Design Statement.

In line with the comments received from Cork City Council, the height of the proposed scheme has been decreased from seven storeys to six storeys, at highest. The new height of 6 no. storeys is intended to decrease the perceived visual impact of the proposed development, while also ensuring that it is in keeping with the surrounding area. We would like to highlight the neighbouring site of Wilton Shopping Centre is due to be redeveloped (Reg. Ref. 1837794), and this permits a 2-7 no. storey extension. In addition, the nearby Cork University Hospital is currently 6 no. storeys in height. We therefore submit to the Local Authority that the proposed development is in keeping with the surrounding area, the pattern of permitted development and will not be visually obtrusive. The surrounding building typology is further discussed in the *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates.

The Design Statement prepared by Reddy Architecture + Urbanism outlines the proposed layout and tiered approach to the buildings, which will allow the new structure to seamlessly integrate with the receiving environment.

The design statement states the following;

"The overall height of the East Block and the eastern arm of the Middle Block was reduced to six storeys from seven to lessen the scale of the overall development. To retain the density of the scheme, the west arm of the Middle Block and the east arm of the West Block were raised to six storeys. This still maintains the reduction in scale and massing from six storeys in the east to the two-storey Townhouses in the west".

We submit to the Local Authority that the apartment buildings feature varying parapet heights and create a sense of diversity in their overall massing and design. The design has ensured to include the step down from the six-story East Block at Sarsfield Road to two-story townhouses along the western boundary, to tie in with the lower-scale neighbourhood of Cardinal Court. The massing and form of the proposed development are further diversified by shifting the apartment layouts, adding more corners, and offering dual-aspect apartments across various elevations.

In addition, the planning application is accompanied by a robust *Landscape Visual Impact Assessment* (LVIA) prepared by Park Hood Chartered Landscape Architects. The Report addresses the Council's points regarding Chapter 11 of the *Development Plan*. The following is stated;

"Chapter 11 Cityscape and Building Height sets out Cork City's building height and tall building strategy and is based upon work prepared as part of the Cork City Urban Density Building Height and Tall Building Study 2021. Table 11.1 Cork City Building Height Standards in the CCDP locates Wilton in the Fringe/Corridor/Centre. The majority of the Application Site falls within 'Inner Urban Suburbs' and a small portion of the south-eastern boundary is designated as 'Outer Suburbs'. See Figure 5. This designation determines the prevailing and target heights of the site, which are based on the prevailing building heights in the area, which in the case of Wilton is 4 storeys and the 'Inner Urban Suburbs' and 'Outer Suburbs' 3 storeys;

According to Map 8 in the Mapped Objectives of the CCDP, buildings in Wilton have an upper target height of 5 storeys. However, the location of the Application Site according to the Map is substantially located in the Southwest Corridor and defined as 'The Inner Urban Suburbs' and 'Outer Suburbs' with an upper limit of 4 storeys. See Figure 6;

Section 11.45 of the CCDP defines a tall building as one that is equal to more than twice the height of the prevailing building height in a specific locality, the height of which will vary between and within different parts of Cork City. "Within Cork City only buildings above 18m/6 residential storeys are considered 'tall buildings' and only then when they are significantly higher than those around them." The proposed development ranges from 2 no storeys to 6 no storeys and so not considered a 'tall building'. This is addressed further in the visual assessment section in this report;

The Application Site has a large number of detractors and features, including light industrial works, large retail outlets with extensive car parking and a major road infrastructure, which degrade the quality of the landscape. The Application Site has a high level of containment, and the landscape has a high level of ability to tolerate the nature and scale of change of the development". [Our Emphasis]

As stated above, and in the accompanying Report, we contend that when the proposed structure is considered against the existing residential typology the building should not be considered a 'tall building'. This statement and assessment of the proposed development is in line with the *Development Plan* and the sustainable development of Wilton.

In addition, while the proposed development in these circumstances is not necessarily considered a 'Tall Building', the accompanying *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates assesses the structure as such. Please refer to Section 4.2.1, Table 4.2.2 for further information. We would like to highlight that the proposed development meets the sensitivity criteria for increased heights.

2.1.1 Item No. 1 (b)

Item No. 1 (b) states:

“Further consideration of the visual impact of the scheme including an assessment of whether the development would break the skyline when viewed from Sarsfield Road north and south and the potential impact on linear views of Landmark Buildings such as County Hall and Our Lady's Hospital (See also Item 4(a) below in this regard). Prior to the carrying out of a detailed visual impact assessment it is recommended that a balloon test be carried out on site in order for the Planning Authority to determine suitable viewing assessment points having regard to the variation in ground levels in the surrounding area;

As advised at the pre-planning stage there may be scope to increase height to the west pf the site to support an appropriate density level on this site – there may be scope to introduce duplex units and/or apartment units in this location. In addition, it may be prudent to reduce the floor to ceiling heights in certain locations. Further consideration of the lowering of ground levels in this location is also recommended;

See also Item 4 (a) below and note that the Planning Authority would welcome the opportunity to discuss any revised proposals prior to the formal submission of the planning application”.

Response

In response to the above, a revised *Landscape and Visual Impact Assessment* has been prepared by Parkhood Chartered Landscape Architects. In addition, Redline Studios has prepared revised verified views which are to be read alongside the *Landscape and Visual Impact Assessment*.

The design team considered a number of design options with varying housing typology. This included considering the use of duplex units. The following is outlines in the Architectural Design Statement.

“In total, eleven options were explored, nine of which had at least three variations. The options included low, medium, and high-density solutions with a mixture of apartment, duplex, and townhouse typologies along with options for lower or higher car space provision, including under-podium car spaces. A number of lower density options were rejected as they weren't viable in the context of an existing low-rise, low-density area. These options were demonstrated at S247 report stage;

The current option was ultimately selected as it provided the most viable solution in terms of density and mix, the provision of much-needed residential units, the retention of the existing mature trees on site, and the sites surrounding low rise context. The preferred option, Option 11, was a higher density option with under-podium car park provision and consisted of apartment and townhouse typologies for tenure mix”.

However, a unit mix of 152 no. 1-bed apartments, 168 no. 2-bed apartments, 12 no. 3-bed apartments, and 16 no. townhouses were chosen. The proposed development includes 2 no. storey townhouses and 3 no. apartment blocks ranging from 5-6 storeys. As previously stated, in response to the S32B meeting and the LRD Opinion the apartment blocks were reduced from 7 no. storeys to 6 no. storeys.

We believe the proposed development is appropriate for the subject site's location. A number of design measures including the reduction of the apartment blocks height ensure the proposed development is not visually prominent.

We would like to highlight that in response to Cork City Council's LRD Opinion, the applicant has increased the viewpoints to ensure the proposed development is thoroughly reviewed. The revised Report robustly assesses the potential impact of the proposed development from 19 no. viewpoints. The 19 no. viewpoints encompass specific locations requested by the local authority, please refer to the accompanying LVIA and Verified Views Booklet for further information.

In response to the Local Authorities' request to carry out a balloon test, the accompanying LVIA states the following.

"The study area includes the application site itself and the wider townscape where the proposed development may have an influence either directly or indirectly. There is no specific guidance on extents of study areas applicable to this type of development in Ireland. In this report the visual assessment is approximately 1km from the periphery of the site, although references to the wider area will be made in relation to landscape character and local and national planning policies. Given the area comprises built townscape, the use of digital Zone of Theoretical Visibility Maps (based on topography) to assess potential viewpoints was considered superfluous as urban views are usually constrained by built environment;

Item 1 B) of the LRD opinion received from Cork City Council for the application requests that a balloon test be carried out on site in order for the Planning Authority to determine suitable viewing assessment points having regard to the variation in ground levels in the surrounding area. The ESB depot currently has a large communications mast within the curtilage of the site. This mast was used in place of the balloon test as a visual reference point during the visual assessment to establish the likely range and orientation of visibility for the site as the structure is of significant height and is readily visible within the landscape. The selected viewpoints were then further ratified by the production of verified photomontage imagery".

Therefore, we submit to the local authority that the methodology outlined above, and the accompanying verified views and report accurately show the proposed development and how it interacts with the landscape. This allows the Local Authority to assess the proposed development's impact on the urban environment and should be sufficient to facilitate assessment. A single balloon does not accurately represent the full mass and form of the proposed structure, especially for a large development like this scheme, verified photomontages are more effective. Given the practical limitations of balloon tests and reliance on weather conditions, it is reasonable to argue that it is not required in this instance, due to the inclusion of a comprehensive LVIA and Verified Views package, which is a more reliable assessment method.

2.2 Item No. 2

Item No. 2 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the City Architect's Section

Response

In response to the above, please refer to the accompanying *Architectural Design Statement* prepared by Reddy Architecture + Urbanism for further information. In addition, the City Architect's comments are further discussed in Section 4.0 of this Report.

2.3 Item No. 3

Item No. 3 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to provide for active permeability through the site on cycle/foot through to Cardinal Court - Note the dwellings backing onto Cardinal Court should be redesigned to take into account then need for passive surveillance along this route (Objectives 2.10, 2.14 and 4.5 of the Plan).

Response

In response to the above, please refer to Section 2.1 and Section 3.2 of the accompanying *Architectural Design Statement*. The following is stated regarding the site's permeability;

“The permeability of the site has been improved to the west with a potential pedestrian connection to the Cardinal Court neighbourhood, subject to the connection point being changed from private to public ownership, which would provide pedestrian access from Cardinal Court to Sarsfield Road via the proposed development;

...

There is a comprehensive footpath network provided on-site that runs parallel to the main vehicular route and also meanders through the landscape;

The entrances into the apartment buildings are located along the sides of the buildings and access is by footpath only, through the landscape and away from the traffic in order to provide a calm entrance sequence into the building;

Potential future connection to the residential neighbourhood of Cardinal Court to the west of the site has been facilitated, with passive surveillance from the townhouses next to the path. This provides the potential for full permeability through the site, blending the scheme fully in the neighbourhood”. [Relevant Quotes Extracted by TPA]

In the layout of the site permeability has been prioritised to ensure that the proposed development will integrate with the abutting existing residential dwellings.

The potential future pedestrian link was discussed with Cork City Council as part of pre planning discussions and we wish to reiterate that these lands are not taken in charge by the Council and at present it is not possible to include these lands as a part of the proposed development. Accordingly future provision is provided should the status of these lands change in the future.

In addition, the accompanying *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates addresses how the proposed development is compliant with policy objectives 2.10 and 2.14 of the *Development Plan*. Policy 4.5 of the *Development Plan* is outlined as follows;

“Objective 4.5 Permeability

*a. All new development, particularly alongside the possible routes identified for public transport improvements, **shall include permeability for pedestrians, cyclists, and public transport so as to maximise its accessibility;***

*b. To maximise permeability, safety, security and connectivity for pedestrians and cyclists **by creating direct links to adjacent roads and public transport networks in accordance with the provisions of statutory guidance as prescribed**”. [Our Emphasis]*

As outlined above and within the submitted *Architectural Design Statement* the proposed development has ensured permeability for all future users of the site. The site’s access to public transport and predicted travel trends of the proposed development’s users is also addressed in the documentation prepared by ILTP Consulting Engineers.

2.4 Item No. 4

Item No. 4 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the Objective 3.6 Housing Mix and the min/max and targets for dwelling size mix as outlined within the Table 11.8 of the Cork City Development Plan 2022-2028 noting the under provision of 3 and 4 bed units and overprovision of 1 and 2 bed units within the proposal.

Response

In response to the above, please refer to the accompanying Architectural Design Statement prepared by Reddy Architecture + Urbanism for further information. In addition, please refer to the ‘Unit Mix’ section of the *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates.

We would like to highlight in response to the S32B Meeting the proposed development housing mix has been updated. The unit mix now includes the provision of 3-bed apartment units, the updated unit mix is outlined as follows; 16 no. 2- storey, 3 no. bedroom townhouses and 332 no. apartment units (152 no. 1 bedroom apartments, 168 no. 2 bedroom apartments, 12 no. 3 bedroom apartments). This update further diversifies the proposed development’s unit mix. We would also like to highlight that the proposed development constitutes substantially cost rental apartments, affordable purchase homes and social housing, all of which are desperately needed in Cork City and the Wilton area.

The *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates unit mix rationale is derived from extensive research into CSO data comparing demographics, income, and current trends in housing demand. The Report also outlines the subject site's suitability for an increased density with ease of access to employment points, community infrastructure, and public transport. The accompanying Report states the following;

"In summary, based on the information and research provided, as well as evidence of market demand, we believe that the proposed development, which constitutes a cost rental and AFS scheme, which is in critically short supply in Cork City, represents an exceptional circumstance that justifies deviating from the Unit Mix specified in the Cork City Development Plan (2022-2028). Again, we note that the proposed unit mix aligns with current national guidance for sustainable apartment development and reflects the needs of the area's population;

In conclusion, the unit mix is market-driven, policy-compliant, and financially sustainable, addressing Wilton's acute housing needs while supporting sustainable urban development".

We submit to the Local Authority that the proposed development has been designed in response to the current housing needs of not only the Wilton area but also Cork City. The delivery of the residential development would add diversity to Wilton's housing market which is predominately three and four-bed terraced housing. Providing much-needed accommodation for single people and smaller family units. Please refer to the accompanying documentation for further information.

2.5 Item No. 5

Item No. 5 states:

"Further consideration of the scheme and amendment of proposals to take into account the report of the Biodiversity Officer".

Response

In response to the above, please refer to the accompanying documentation prepared by Malone O' Regan Environmental for further information. In addition, the Biodiversity Officer comments are further discussed in Section 4.0 of this Report.

2.6 Item No. 6

Item No. 6 states:

"Further consideration and proposals to take into account Uisce Eireann submission and the report of the Drainage Section in relation to wastewater".

Response

In response to the above, please refer to the accompanying documentation prepared by Barrett Mahony Consulting Engineers for further information. In addition, the Uisce Eireann Submission and the Report from Cork City's Drainage Section are further discussed in Section 4.0 of this Report.

2.7 Item No. 7

Item No. 7 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the E.E. Environment Section”.

Response

In response to the above, please refer to the accompanying documentation prepared by Malone O’ Regan Environmental for further information. In addition, the report from Cork City Council’s E.E. Environment Section is further discussed in Section 4.0 of this Report.

2.8 Item No. 8

Item No. 8 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the Senior Executive Transport Officer.”

Response

In response to the above, please refer to the accompanying documentation prepared by ILTP Consulting Engineers for further information. In addition, the report from Cork City Council’s Senior Executive Transport Officer is further discussed in Section 4.0 of this Report.

2.9 Item No. 9

Item No. 9 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the report of the S.E.E. Urban Roads and Streets Design Section”.

Response

In response to the above, please refer to the accompanying documentation prepared by ILTP Consulting Engineers for further information. The documentation prepared by Reddy Architecture + Urbanism is intended to be read in tandem in this regard. In addition, the report from Cork City Council’s S.E.E. Urban Roads and Streets Design Section is further discussed in Section 4.0 of this Report.

2.10 Item No. 10

Item No. 10 states:

“Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the report of the E.E. Traffic & Regulation Section”.

Response

In response to the above, please refer to the accompanying documentation prepared by ILTP Consulting Engineers for further information. In addition, the report from Cork City Council's E.E. Traffic & Regulation Section is further discussed in Section 4.0 of this Report.

2.11 Item No. 11

Item No. 11 states:

"Further consideration of revised proposals/drawings/details to address the comments of the Public Lighting Section. Please note that these comments should be considered in conjunction with comments of the Biodiversity Officer in relation to protection of bat species and may require modification to take account of same".

Response

In response to the above, please refer to the accompanying documentation prepared by EDC Engineering Design Consultants for further information. In addition, please refer to the Bat Report and accompanying documentation prepared by Malone O' Regan Environmental for further information. Recommendations from the project ecologist have been comprehensively integrated into the proposed landscaping and public lighting schemes for the project accordingly.

2.12 Item No.12

Item No. 12 states:

"Further consideration of revised proposals/drawings/details to address the comments of the A/Senior Parks & Landscape Officer including further consideration of the design of communal amenity space areas including the design of small play spaces and play areas as outlined in Paragraph 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) and Objective 3.32 of the Plan 'Inclusive Design' - in relation to the podium levels".

Response

In response to the above, please refer to the accompanying documentation prepared by Park Hood Landscape Architecture. Ample play facilities have been provided for within the scheme, including c. 156 sq m in public play areas and 154 sqm provided in the podium gardens. In addition, please refer to the accompanying documentation prepared by Reddy Architecture + Urbanism for further information.

2.13 Item No. 13

Item No. 13 states:

"Further consideration of the scheme and amendment of proposals to take into account the submission received from Cork City Childcare which recommends provision of a creche with a capacity of 157 children. In addition, further consideration and an amendment of phasing strategy is required in order to ensure delivery of the creche in Phase 1".

Response

In response to the above, please refer to the *Architectural Design Statement* prepared by Reddy Architecture and Urbanism. In addition, please refer to the accompanying *Childcare Demand Assessment* prepared by Tom Phillips + Associates.

The *Childcare Demand Assessment* outlines the surrounding number and capacity of existing childcare facilities, the current demand for childcare, along with the predicted number of preschool children expected to be generated from the proposed development. The assessment also takes into consideration the current national and local policy requirements regarding childcare provision within proposed developments. The Assessment concludes by stating the following.

*“The proposed Wilton LRD includes the provision of 348 no. residential units, comprised of 152 no. 1-bed, 168 no. 2-bed, and 28 no. 3-bed units). The proposed scheme also includes the provision of a 156sqm childcare facility capable of accommodating 52 no. children at any one time. **Based on the proposed housing mix, we estimate that the proposed development will result in a demand for 52 no. childcare spaces, therefore the proposed on-site childcare facility will be capable of supporting the anticipated childcare demand which will result from the proposed development;***

*Currently, there is an average 86% operating level for the 16 no. existing childcare facilities located within 2km of the subject site, **with an estimated 92 no. unoccupied childcare spaces available.** Therefore, we contend that there is not any existing undersupply of childcare facilities in the surrounding area;*

Therefore, we contend that the proposed childcare facility, alongside the existing provision in the surrounding area, will be capable of supporting the childcare needs of the future residents of the proposed development at lands to the north of the ESB Networks Wilton Office, Sarsfield Road, Wilton, Cork.” [Our Emphasis]

We submit to the local authority that a childcare facility (c. 156 sqm) offering 52 no. childcare spaces meets the requirements of the current legislative guidelines. The submitted report outlines the proposed development’s compliance with the *Childcare Facilities: Guidelines for Planning Authorities (2001)* and the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)*. It is noted that any future operator of the site would be subject to Túsla requirements regarding pupil numbers and classroom ratios, of which they will comply.

The *Architectural Design Statement* states the following regarding the proposed creche.

“A 156m2 creche facility is located on arrival to the development on the ground floor of the middle bloc It is highly visible and adjoins the village green which provides almost an acre of green space available to the creche, two informal play areas, seating, and planting, all designed by the landscape architects. The creche also affords pastoral views over the retained mature trees within the green, and has immediate connection to the active travel route which connects to Sarsfield Road. Four parking spaces are adjacent to the creche for staff and visitors;

It is intended that this will be a full day-care facility for babies (0-1 year) and toddlers (1-2 years). The documents Best Practice Guidelines for the Design of Childcare Facilities as well as Childcare Facilities, A Guideline for Planning Authorities 2001 informed the design of the proposed-on site creche facility;

Following feedback from Cork City Childcare Committee, three classrooms are now being provided to assist future operators' compliance with Túsla requirements. A sleep room for babies is al provided. These spaces will be supported by a staff office, storage, and bathrooms;

The creche play area is located directly outside the entrance to the creche, away from main vehicle routes. With these changes the facility can now accommodate 52 children”.

Therefore, we submit to the Local Authority that the proposed creche is in line with the operational requirements of Túsla and the current legislative guidance. We would also like to highlight that the proposed development is intended to be delivered in 1 no. phase, which includes the construction of the creche.

2.14 Item No. 14

Item No. 14 states:

“Further consideration of the scheme and amendment of proposals to take into account the submission received from the I.A.A”.

Response

In response to the above, please refer to the accompanying Aeronautical Assessment Report prepared by O'Dwyer + Jones Design Partnership. This Report concludes three of Cork Airport's "obstacle limitation surfaces" lie above the site – the "Approach Surface" to Runway 16, the "Take-off Climb Surface" from Runway 34, and the airport's "Inner Horizontal Surface" (which is the lowest of the three Surfaces above the site). These are wholly unaffected by the proposed development, which lies at more than 150m below the lowest of these Surfaces. The site is well clear of the Approach and Departure Surfaces to the new Helipad at CUH (700m to the north), which is unaffected by the proposed development. Parts of the site lie within an Outer Public Safety Zone and airport Noise Zone 'C'; however, the development will comply with the requirements of these zones. The proposed development will not have any effect on Cork Airport's Navigational Equipment, or on any Flight Paths, or give rise to any Bird Strike Hazard. Cranes on site during construction will not extend near any "obstacle limitation surface", but cranes must be notified 30 days in advance to the IAA and to Cork Airport, and it is desirable that they also be notified to the HSE's aero-medical unit. We consider that the proposed development will comply with all aviation and aeronautical requirements affecting its site.

2.15 Item No. 15

Item No. 15 states:

“Further consideration of the scheme and amendment of proposals to take into account the submissions received from T.I.I. and N.T.A”.

Response

In response to the above, please refer to the accompanying documentation prepared by ILTP Consulting Engineers for further information. The ILTP Traffic and Transport Assessment and Mobility Management Plan has been informed by the comments received by both TII and the NTA accordingly. In addition, ILTP met with Cork City Council on various dates, to discuss the planning application and items relating to traffic and transport. It is noted that Cork City Council support in principle to providing vehicular access to the proposed development site from Sarsfield Road. ILTP also agreed the scope to the TTA assessment with the Local Authority. ILTP coordinated traffic count surveys undertaken in April 2024 in order to collate the full set of traffic data considered necessary to support the planning application for the proposed development. The traffic survey data was further validated through repeat surveys undertaken in November 2024 and by TII permanent traffic count data. It is considered that background traffic at the subject site will not grow over time. This is in line with traffic volume trends in the vicinity of the subject site and is also underpinned by the policies and objectives as set at National, Regional and Local level.

To ensure a robust Traffic Impact Assessment of the proposed development however, ILTP did not include for any reduction in background traffic volumes for future year scenarios below current levels. Instead ILTP applied a worse-case scenario by applying the NTA traffic growth rates to the recorded 2024 traffic count survey data in order to create opening and design year scenarios. In addition, additional traffic generated by the proposed development was added to existing traffic conditions. Based on the traffic conditions observed during site visits and the traffic surveys, the location of the development, and the proximity to the main road network, ILTP estimated a 70/30 split in Trip Distribution for traffic exiting the development on the Sarsfield Road with the majority of car-based trips coming to and from the south ring road.

The proposed development fully accords with the policies as set down in the Cork City Development Plan and Cork Metropolitan Area Transport Strategy. The proposed development is fully supported by National, Regional and Local Plan policies and has evolved in a manner so that it fully supports the principles for sustainable transport as set out in Smarter Travel and DMURS. While the TTA assumed robust, worst case scenario assumptions in respect to traffic flows and traffic generation, it demonstrates that with the proposed access and egress arrangements the overall traffic impact can be accommodated in the road network. The proposed development will promote sustainable travel patterns by virtue of its location, layout, design and proximity to the public transport and cycle networks. These will be complimented with a Mobility Management Plan and the appointment of a Mobility Manager to promote sustainable travel patterns. The proposed development is located and designed such that it will not have any significant traffic impact on the existing developments in the area. The access and internal layout are designed in accordance with DMURS and includes for good permeability and will promote and facilitate sustainable travel patterns as part of the overall development. Please refer to the ILTP documentation accordingly.

3.0 PART TWO OF LRD OPINION

3.1 Item No. 1

Item No. 1 states:

“All additional studies/updated reports as recommended by the various Section reports (see attached)”.

Response

In response to the above, please refer to documentation submitted as part of this planning application. All required updates or studies have been duly completed, as outlined in the *Planning Report and Statement of Consistency*, prepared by Tom Phillips + Associates.

3.2 Item No. 2

Item No. 2 states:

“A revised Schedule of Accommodation updated to reflect any design changes and correcting any discrepancies (e.g. it is noted for example that two Schedules Rev C and Rev D - both of which refer to a 2-6 storey development. In addition it should be noted that Variation No 1 of the Plan and the location of the site within parking zone 3 in the Cork City Car Parking Zones map in Volume 2 of the Plan should be referenced in relation to parking standards”.

Response

In response to the above, please refer to the accompanying *Schedule of Areas / Housing Quality Assessment* prepared by Reddy Architecture + Urbanism.

Additionally, Section 4.2.1 *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates assesses the proposed car parking provision. The report also outlines the proposed development’s compliance with Variation No. 1 and addresses the site’s location within parking zone 3 in the Cork City Car Parking Zones Map, Volume 2 of the *Development Plan*.

We would like to note that the proposed development car parking provision is 148 no. spaces, which is in line with the *Development Plan* and the relevant national policies.

3.3 Item No. 3

Item No. 3 states:

“Updated Schedule documents to demonstrate compliance with the relevant national minimum standards for housing and apartments”.

Response

In response to the above, please refer to the accompanying Schedule of Areas / Housing Quality Assessment prepared by Reddy Architecture + Urbanism. The scheme is fully compliant in this regard.

3.4 Item No. 4

Item No. 4 states:

“A fully comprehensive Landscape and Visual Impact Assessment arising from further assessment and selection of further assessment viewing points as outlined to Item 1 above. At a minimum it is recommended that the following additional viewing points be assessed and photomontages of the proposed development submitted from these locations:

- *Sarsfield Road heading south from the Wilton roundabout at a number of locations;*
- *Sarsfield Road heading north at additional locations;*
- *Sarsfield Road heading north at the junction with the westbound slip before the roundabout;*
- *Sarsfield Road north of the roundabout where views are currently available of County Hall and Our Lady's Hospital (close to junction with Eagle Valley);*
- *From within the Doughcloyne Industrial Estate where views of the site are available;*
- *From the N40 on the descent from the flyover of the Bandon Road Roundabout heading east;*
- *Other locations along the N40 where the ESB mast is visible in both directions east and west;*
- *From within the Tesco car park and staff car park;*
- *From Bishopstown Road where views of St. Joseph's Church are available”.*

Response

In response to the above, please refer to the accompanying Landscape and Visual Impact Assessment (LVIA) prepared by Park Hood Landscape Architecture.

The accompanying LVIA comprehensively assesses the proposed development from 19 no. viewpoints, including the locations listed above. The LVIA states the following

“The proposed development at a maximum of 6 storeys is in an ideal location, with little visual impact and aligning with Wilton shopping centre, which has had permission for a 7-storey building as part of the extension to the shopping centre, which will reinforce a spatial hierarchy and form in the local context with a capacity in the area and transport network to accommodate facilities and services;

The Application Site is in an area with a large number of detractors and features which degrade the quality of the landscape including light industrial works, large retail outlets with extensive car parking and a major road infrastructure, all of which have a negative influence on the character and experience of the landscape;

The proposed development is a well-designed and considered scheme with opportunities for both the residents and general public to take advantage of the high-quality public realm. 5.41 The photomontages are illustrating the proposals during the winter months, the worst-case scenario. Summer views when the trees are in full leaf will give greater screening of the proposals, particularly from Viewpoint 1 Sarsfield Road, Viewpoint 3 Southbury Road, and Viewpoint 6 Cardinal Court; These will be filtered views but unlikely to change the assessment. The Application Site has a high level of containment, and the landscape has a high level of ability to tolerate the nature and scale of the proposals;

The proposed development, while substantial and higher than the existing surrounding light industrial, retail, car parks, road infrastructure and residential areas, would result in a positive contribution to the character and urban fabric of this area in terms of landscape character. The architecture, facades, landscape design, usage and enhanced public realm will contribute to the townscape character of the southwest suburbs of Cork and will give the Application Site a more productive and appropriate land-use. On balance there are no unacceptable landscape/townscape or visual impacts and from the majority of views the proposals can be accommodated Project No. 7848 LDA Wilton, Sarsfield Road, Cork December 2024 Page 82 alongside the existing and proposed built form and infrastructure and can be successfully absorbed into the character and views of the southwest suburbs of Cork City”.

Therefore, we submit that potential impact of the proposed development on the receiving environment has been robustly assessed. Please refer to the enclosed documentation from Park Hood accordingly.

3.5 Item No. 5

Item No. 5 states:

“Revised and updated photomontages to take account of any alterations to the proposed design”.

Response

In response to the above, please refer to the accompanying Verified Views booklet prepared by Redline Studios. These should be read in conjunction with the LVIA prepared by Park Hood.

3.6 Item No. 6

Item No. 6 states:

“A revised and updated Landscape Masterplan taking into account design changes made on foot of the above including comments of Parks and Recreation Section viz-a viz play spaces and SuDs details”.

Response

In response to the above, please refer to the Landscape Strategy Report, Landscape Management Plan, and the accompanying drawing pack prepared by Park Hood Landscape Architecture.

Play facilities are noted as a part of the Landscape Strategy Report and these are in line with Development Plan requirements. In addition, the SuDs details are identified in the landscape strategy. This is also outlined in the enclosed Infrastructure Report, prepared by BMCE, which notes that extensive green roof provision is included with the proposed scheme. Hydrocarbon interceptors, permeable paving, bioretention and tree pits are also proposed.

3.7 Item No. 7

Item No. 7 states:

“A Statement of Design Acceptance (S.O.D.A) from Uisce Éireann”.

Response

In response to the above, please refer to the Infrastructure Report and Flood Risk Assessment prepared by Barret Mahony Consulting Engineers. The Statement of Design Acceptance from Uisce Éireann is attached as Appendix IX of the accompanying report.

3.8 Item No. 8

Item No. 8 states:

“A statement on how the development has incorporated placemaking and how the how the proposal would respect, reflect or contribute to the character and vibrancy of the particular neighbourhood, centre or area, commensurate with the nature and scale of the development, and how the development would deliver or contribute towards a quality urban environment and public realm with a focus on accessibility, pedestrian priority and permeability”.

Response

In response to the above, please refer to the accompanying Architectural Design Statement prepared by Reddy Architecture + Urbanism. Additionally, please refer to the *Planning Report and Statement of Consistency* prepared by Tom Phillips + Associates. The entire scheme is predicated on good urban design with a large public realm component based on the location of existing stands of mature trees and orientation of the buildings to maximise good aspect. The site layout and landscape design is based on a hierarchy of neighbourhood character areas that are interlinked with connectivity and permeability through the public realm and landscape with potential pedestrian and cycling linkages to the surrounding area taken into consideration. Please refer to Section 3.1 to 3.7 Proposed Design and 3.8 Landscape Design of the Design Statement prepared by Reddy A + U.

3.9 Item No. 9

Item No. 9 states:

“A statement on how the development has considered climate resilience from design to implementation stages”.

Response

In response to the above, please refer to Section 2.1 and 3.0 of the accompanying *Architectural Design Statement* prepared by Reddy Architecture + Urbanism. Sustainability is a core feature of this design, particularly with respect to mitigation and regeneration.

The focus of the site strategy is to incorporate and retain as much as possible of the existing mature vegetation while supporting compact development growth. The site has no existing buildings or structures and so there is no opportunity for adaptive re-use of existing assets and therefore our focus has been on reduced footprints of buildings to enhance and existing green infrastructure and provide more sustainable higher density residential development.

The design team has considered a number of energy strategies led by a fabric first approach combined with a number of heating options including centralised, district and individual home heating systems analysis, to be established in a Heating Strategy Comparison Report – please refer to drawings and documents from EDC Engineers that accompany this application.

The proposed development will be developed as a climate resilient neighbourhood by incorporating, where appropriate, sustainable urban drainage systems (SUDS) and by achieving an ambitious mode split that prioritises walking, cycling and public transport over other modes. These will have a significant benefit for climate resilience and in terms of placemaking by designing streets that are not dominated by vehicular space. The drainage strategy for the site has also had regard to potential pressures arising from the site due to changing climate into the future. Accordingly, a 20% allowance has been afforded to cater for climate change as a part of the attenuation strategy for the site.

The design of the proposed development has reduced parking provision in line with Cork City Council policy and LDA ambition to reduce car dependency in their developments. The current suburban location of the site is not well served by public transport and therefore to be viable, undercroft parking podiums at ground level are provided with surrounding on-grade parking incorporated in the public realm. The landscape and site strategy enables the future incorporation of the on-grade parking areas into the landscape with the under-podium parking becoming mobility hubs as the provision of public transports improves as per the Cork Metropolitan Area Strategy (CMATS) over time.

We note that the Home Performance Index (HPI) is to be used as the main sustainability assessment tool and certification methodology. Reddy Architecture + Urbanism have carried out an initial assessment of the project in terms of HPI, which are outlined in section 3.9 of the enclosed *Architectural Design Statement*.

3.10 Item No. 10

Item No. 10 states:

“A Scheme Sustainability Statement (Objective 5.16 and Chapter 11 of the Plan) demonstrating how the proposal positively responds to the impact of climate change through mitigation and adaption measures;

It should be noted that as per Paragraph 11.273 of the Plan 'As part of the Scheme Sustainability Statement, applicants will be required to demonstrate how these considerations were explored and taken forward through the evolution of the development proposal and where they have not been taken forward, reasons are given as to why the measures were not technically feasible or viable. The level of information and commitments within the Statement should be proportionate to the scale and complexity of the development proposal'.

Response

In response to the above, please refer to Scheme Sustainability Statement, which is noted as Appendix B of this Response.

3.11 Item No. 11

Item No. 11 states:

"The Submission of an updated Daylight and Shadow Study to take full account of all proposed development and proposed amenity spaces and all existing surrounding residential properties (Cardinal Court) and their amenity spaces following amendments to the Scheme as outlined above. The Daylight and Shadow Study should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity/garden/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 such as 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' and the new guidelines published in 2022. 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. Note - it is very important that all measures of daylight {Vertical Sky Component, Average Daylight Factor and No Skyline) and sunlight (annual probable sunlight hours) are assessed in order to avoid presenting a partial, or biased, analysis of performance".

Response

In response to the above, please refer to the *Daylight and Sunlight Report* and technical note prepared by GIA Surveyors. The Report outlines not only the daylight and sunlight amenity of the proposed development but also that of the adjoining existing residential properties. Overall, the results given on pages 30-93 of the Report show that 94% (870/924) of the proposed habitable rooms within the Proposed Development will see levels of MDI that either meet or exceed the BRE/BS EN 17037 recommendations, which is considered excellent. When considered alongside the compensatory measures embedded in the design and as a result of the optimisation throughout the design process, the proposed development will provide future residents with excellent daylight and sunlight amenity overall, as per the enclosed GIA Report.

3.12 Item No. 12

Item No. 12 states:

“An updated Childcare Demand Assessment Report taking into account the submission from Cork City Childcare”.

Response

In response to the above, please refer to the accompanying Childcare Demand Assessment prepared by Tom Phillips + Associates. In addition, it is worth noting that the Design Team engaged with Cork City Childcare in advance of lodgement. Accordingly, the size of the creche was increased and the room configuration was amended to align with Túsla requirements for any future operator. 52 no. childcare spaces are provided, in line with requirements generated by the scheme itself. This level of provision accords with the requirements of the *Childcare Facilities: Guidelines for Planning Authorities (2001)* and importantly is consistent with the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018)*, which is the methodology used to calculate requirements for new developments.

3.13 Item No. 13

Item No. 13 states:

“An Updated Schools Demand Assessment clarifying level of pupils on waiting lists for enrolment years noting oversubscription in nearby primary and secondary schools”.

Response

In response to the above, please refer to the accompanying Schools Demand Assessment prepared by Tom Phillips + Associates. Based on the proposed housing mix and existing demographic profile for the Electoral Division where the subject site is located, we can estimate a likely demand for c. 36 no. primary school places and c. 22 post-primary school places will result from the proposed development. As outlined in this report, the subject site is well located in terms of accessibility to existing primary, post-primary, and special educational needs schools. We contend that the supply of primary school places is currently increasing, due to the phased establishment of South Lee Educate Together National School.

We contend that these additional school places to be established will be sufficient to cater for the anticipated demand for primary school spaces, which will result from the proposed development, alongside the typical provision from other existing schools in the area. The post-primary schools in the study area have seen a 1.6% decrease in enrolments in the last 5 academic years, which has resulted in a surplus of at least 32 no. post-primary school places within the study area. This surplus is sufficient to cater for the likely demand for post-primary school places resulting from the proposed development. The study area features 2 no. special educational needs schools, alongside a large number of additional educational needs classrooms within the mainstream primary and post-primary schools, which will cater for those students who require additional educational supports.

4.0 APPENDIX C OF CORK CITY COUNCILS LRD OPINION

4.1 Architecture Section

4.1.1 Item No.1

Item No. 1 States:

“To allow for permeability of the site, there should be a connection to Cardinal Court housing estate to the west at least to allow pedestrians and cyclists access the site and surrounding areas and avoid an effective cul de sac. At the LRD Opinion Meeting (27th September) the applicant noted that Cardinal Court had not been taken in charge but nonetheless, all efforts should be made to create this link”.

Response

In response to the above, please refer to the accompanying Architectural Design Statement prepared by Reddy Architecture and Urbanism. The potential future pedestrian link was discussed with Cork City Council as part of pre planning discussions and we wish to reiterate that these lands are not taken in charge by the Council and at present it is not possible to include these lands as a part of the proposed development. Accordingly future provision is provided should the status of these lands change in the future.

4.1.2 Item No.2

Item No. 2 States:

“The “Site Landscape Boundary Treatments” drawings imply an almost completely walled off development which goes against the preference for permeability. While the railing to the east and southeast appears to try to mimic the existing railing to the existing private greenfield site, it is not appropriate to continue this treatment to the proposed housing scheme and green spaces adjacent to this. The proposed 3 metre high brick wall added for security reasons to the south should also be reconsidered or at least reduced in height as it would be an oppressive and inappropriate addition to the scheme. This massive boundary to the south has also resulted in the removal of many existing trees which were previously proposed to be retained which reduces the quality of the landscaped area around the scheme”.

Response

In response to the above, please refer to the accompanying Architectural Design Statement prepared by Reddy Architecture and Urbanism. The report outlines the proposed development’s layout and design evolution which prioritises permeability throughout the site. Boundary treatments were redesigned following feedback received by Cork City Council during consultation meetings accordingly.

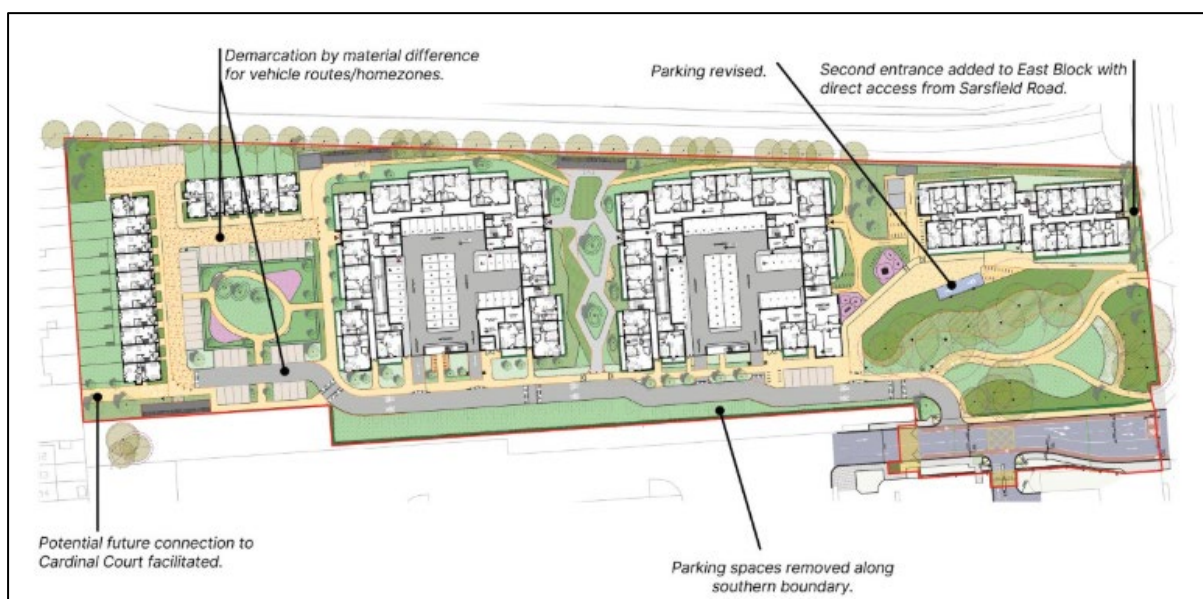


Figure 4.0 Current Site Layout. The image outlines the proposed development's access points, layout, and permeability. [Source: Reddy Architecture + Urbanism, cropped and annotated by TPA 2025]

The proposed development includes 2 no. access points to the east of the subject site providing direct access to Sarsfield Road. This allows the proposed development to actively engage with the street, creating an active street front and providing vibrancy. In addition, it is to be noted the proposed childcare facility is to be located near the front/eastern section of the site. Introducing an active use of this section of the site that will provide passive surveillance, increased foot traffic, and activity.

There is a provision of c. 3,545 sqm of public open space, which is envisioned to be a shared space for residents to use. In addition, as outlined throughout the planning application there is provision of a future connection to the adjoining residential estate Cardinal Court. This will allow future residents and members of the community to easily travel through the area.

The ESB, as the landowner to the south have specific security requirements for their site to the south, accordingly, boundary treatments shared with the ESB site, and the reconfigured access to the Sarsfield Road, have been designed in line with their requirements.

4.1.3 Item No.3

Item No.3 States:

"The number of single aspect north facing apartments have been reduced by slightly improving the north facing apartment to the West and Middle Blocks by stepping the facade to allow for a secondary east or west facing window to the living space. However, there remains 21 single aspect, north facing apartments in the East Block. Section 3.18 of "Sustainable Urban Housing: Design Standards for New Apartments (2023)" states that north facing single aspect apartments may be considered only where overlooking a significant amenity space but no such amenity space does or will exist to the north of the East Block.

Response

In response to the above, please refer to Section 3.4 of the accompanying Architectural Design Statement prepared by Reddy Architecture and Urbanism.

In response to the local authority comments the number of north facing single aspect units has been reduced from 21 no. units to 18 no. units (5%). Every effort has been made throughout the design approach to ensure the residential amenity of these units is safe guarded. The submitted Architectural Design Statement states the following is stated.

“The number of north-facing, single-aspect units account for just 5% (18 units) of the total number of apartments. North facing units have been designed out of the central and middle apartment buildings completely with the 5% located solely in the east block. The desire to retain as many of the matures trees in this portion of the site resulted in a linear shaped block to avoid Root protection zones. Whilst it was staggered in plan to reduce single aspect north facing units, three remain per floor, over 6 floor Compensatory measures include:

- *The 18 units are designed to exceed the minimum floor area standards by 10%. This increased floor area provides a high standard of amenity for residents of these units;*
- *The open aspect without buildings to the north of this block, offering long open views for the upper units;*
- *Provision of external private amenity balconies and terraces for each unit;*
- *Extensive glazing to the facade including glass doors from both bedroom and living room to its balcony/terrace;*
- *Balconies centralised on the plan in order to provide full height, unobstructed windows in both living room and bedroom;*
- *Access to multiple sunny, public open space amenity areas immediately adjacent to their units, including large village green with mature trees;*
- *High-quality residential amenity for each unit including good storage, thermal/overheating performance, energy efficient fixtures and fittings”.*

A number of compensatory measures have been implemented to ensure the residential amenity of these units are of a high standard.

4.1.4 Item No.4

Item No.4 States:

“The north facing ground floor apartments, especially of the West and Middle Blocks, need further consideration with more detailed sections drawn and developed to the adjacent boundaries. At present, as shown by the "Site Contextual Elevations" drawings there is only a narrow and/ or steeply sloped/ stepped open area directly outside these units which is not ideal”.

Response

In response to the above, please refer to the accompanying Architectural Pack prepared by Reddy Architecture and Urbanism. The pack includes elevations for each apartment block along with unit typologies to provide comprehensive details of the proposed dwellings. Please refer to the following drawings for further information.

- *Drawing Reg. Ref. WLT-06-WB-XXX-DR-RAU-AR-1201 P3 WEST BLOCK - GROUND AND FIRST FLOOR;*
- *Drawing Reg. Ref. WLT-06-WB-XXX-DR-RAU-AR-1202 P3 WEST BLOCK - SECOND AND THIRD FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-WB-XXX-DR-RAU-AR-1203 P3 WEST BLOCK - FOURTH FLOOR AND ROOF PLANNING; WLT-06-WB-XXX-DR-RAU-AR-2201 P3 WEST BLOCK – ELEVATIONS;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1301 P3 MIDDLE BLOCK - GROUND AND FIRST FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1302 P3 MIDDLE BLOCK - SECOND AND THIRD FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1303 P3 MIDDLE BLOCK - FOURTH AND FIFTH FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1304 P3 MIDDLE BLOCK - SIXTH FLOOR AND ROOF PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-L00-DR-RAU-AR-1308 P3 CRECHE PLAN PLANNING;*
- *Drawing Reg. Ref. WLT-06-XX-XXX-DR-RAU-AR-1501 P3 UNIT TYPOLOGIES 1 PLANNING;*
- *Drawing Reg. Ref. WLT-06-XX-XXX-DR-RAU-AR-1502 P3 UNIT TYPOLOGIES 2 PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-L00-DR-RAU-AR-2301 P3 MIDDLE BLOCK – ELEVATIONS;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-1401 P3 EAST BLOCK - GROUND TO THIRD FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-1402 P3 EAST BLOCK - FOURTH FLOOR TO ROOF PLANNING;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-2401 P3 EAST BLOCK - ELEVATIONS PLANNING;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-1503 P3 UNIT TYPOLOGIES 3.*

Accordingly, please also refer to the *Architectural Design Statement* (Section 3.4) for detailed information in this regard.

4.1.5 Item No.5

Item No.5 States:

“The East Block is placed at the northern edge of the site which makes sense to allow for the retention of many existing mature trees to the southeast and create a well-designed landscaped buffer to the Sarsfield Road, which is effectively a 5 lane dual carriageway to the east. While the Sarsfield Road does not necessarily constitute a traditional street in its current format, the treatment of the east facade of the East Block should be reconsidered along with its massing and height to potentially provide more interaction with Sarsfield Road”.

Response

In response to the above, please refer to the accompanying Architectural Pack prepared by Reddy Architecture and Urbanism. In order to address the comments from Cork City Council, a number of design changes have been implemented. We would like to highlight the height of the eastern block has been reduced from 7 no. storeys to 6 no. storeys, along with an additional entrance added to the eastern façade. The additional access point provides direct access to the adjoining street and Sarsfield Road.

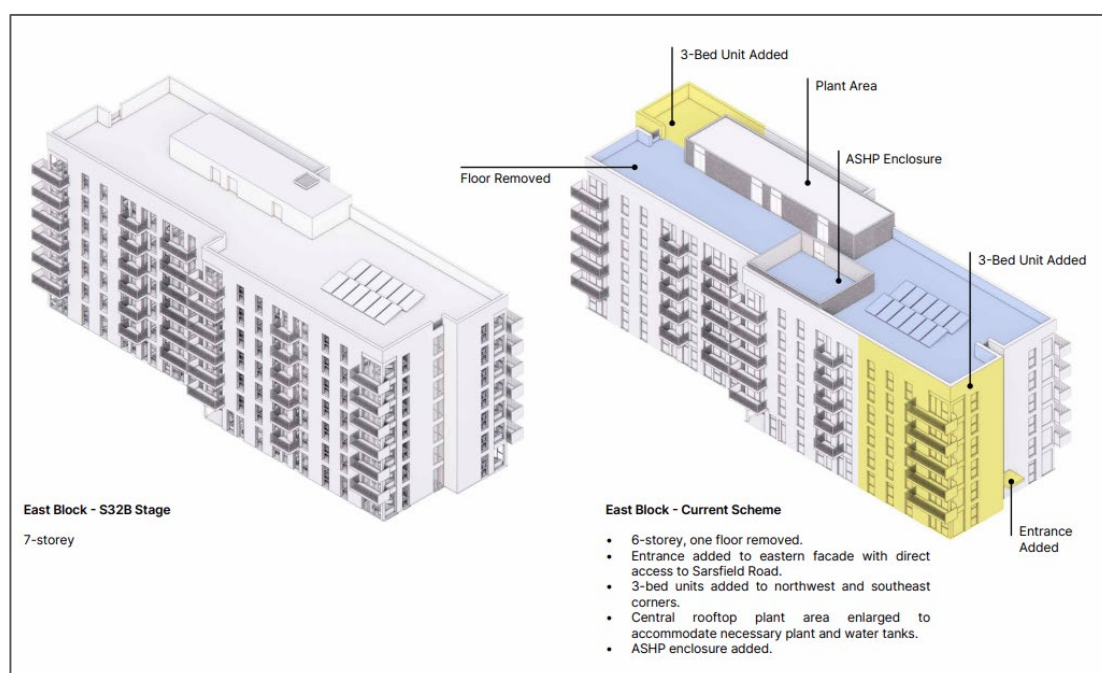


Figure 4.1 S32B Stage vs. Current Proposed Scheme. [Source Reddy Architecture + Urbanism, cropped and annotated by TPA 2025]

We submit to the local authority that the proposed treatment of the east facade of the East Block massing and height is more sympatric to the receiving urban environment and provides increased interaction with Sarsfield Road.



Figure 4.2 – CGI of interface with Sarsfield Road [Source - Red Line Studios, cropped by TPA 2025]

4.1.6 Item No.6

Item No.6 States:

“The cycle path paths through the southeast landscaped area wind through the open green space which reduces its flexibility and usability. While this is partly to deal with gradients and to avoid tree roots/ bases, this should be reconsidered if possible”.

Response

In response to the above, please refer to the accompanying Architectural Pack prepared by Reddy Architecture and Urbanism. While the cycle path will continue through the open green space the design of the site's bicycle access has been designed to prioritise the safety of future users and to utilise the space available. The proposed bicycle path is smooth and even, with good-quality surfacing that reduces bumps and hazards. While also providing sufficient width to allow cyclists to pass one another comfortably and allow pedestrians to frequent the site with ease.

The route is direct and links to key destinations such as the adjoining residential areas and Sarsfield Road ensuring that it is a practical and attractive option for everyday commuting. Additionally, the cycle path has been designed with environmental considerations in mind, integrating green spaces, tree canopies for shade, and maintaining clear sightlines for safety.

The Architectural Design Statement states the following.

“Pedestrian access will be via footpaths at various points and a combined footpath/cycle path centrally located on the eastern boundary. This provides an interactive boundary with Sarsfield Road, connecting to existing footpath and cycle lanes. It helps to separate pedestrian traffic from vehicular traffic, with safe and efficient pathways provided from the east to west of the site, and potential connection to Cardinal Court to the west”.

In addition, the proposed development’s access and connections are outlined in the accompanying Landscape Strategy Report prepared by Park Hood Chartered Landscape Architects. The Report outlines how the proposed development has been designed with all future users in mind.

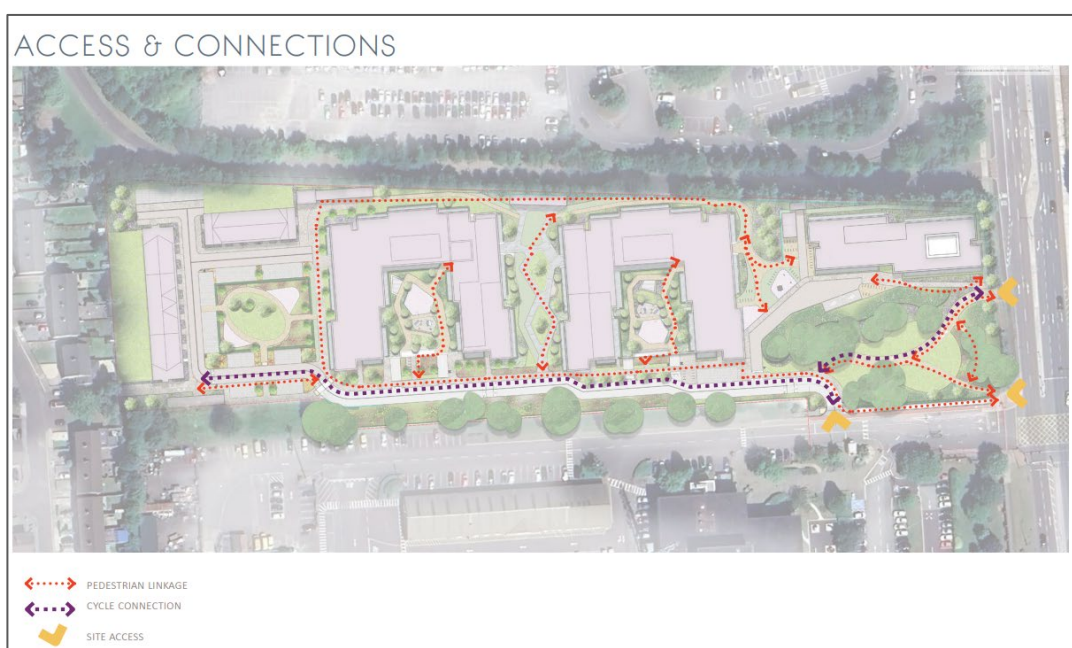


Figure 4.3 Proposed Site's Access and Connections. [Source: Landscape Strategy Report prepared by Park Hood Chartered Landscape Architects, cropped and annotated by TPA 2025]

4.1.7 Item No.7

Item No.7 States:

“While external elevations and general massing generally appear to have been well considered, internal apartment layouts may need further development with apartment entrances seeming to be arbitrarily placed with no connection to separate internal halls etc. which means there is no buffer space from communal corridors to living spaces and bedrooms or from living spaces to bedrooms”.

Response

In response to the above, please refer to the accompanying Architectural Pack prepared by Reddy Architecture and Urbanism. The pack includes plans for each floor of the 3-no. proposed apartment blocks along with unit typologies to provide comprehensive details of the proposed dwellings. Each unit has been designed in order to ensure sufficient buffer spaces are provided in this regard.

Please refer to the following drawings for further information.

- *Drawing Reg. Ref. WLT-06-WB-XXX-DR-RAU-AR-1201 P3 WEST BLOCK - GROUND AND FIRST FLOOR;*
- *Drawing Reg. Ref. WLT-06-WB-XXX-DR-RAU-AR-1202 P3 WEST BLOCK - SECOND AND THIRD FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-WB-XXX-DR-RAU-AR-1203 P3 WEST BLOCK - FOURTH*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1301 P3 MIDDLE BLOCK - GROUND AND FIRST FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1302 P3 MIDDLE BLOCK - SECOND AND THIRD FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1303 P3 MIDDLE BLOCK - FOURTH AND FIFTH FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-XXX-DR-RAU-AR-1304 P3 MIDDLE BLOCK - SIXTH FLOOR AND ROOF PLANNING;*
- *Drawing Reg. Ref. WLT-06-MB-L00-DR-RAU-AR-1308 P3 CRECHE PLAN PLANNING;*
- *Drawing Reg. Ref. WLT-06-XX-XXX-DR-RAU-AR-1501 P3 UNIT TYPOLOGIES 1 PLANNING;*
- *Drawing Reg. Ref. WLT-06-XX-XXX-DR-RAU-AR-1502 P3 UNIT TYPOLOGIES 2 PLANNING;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-1401 P3 EAST BLOCK - GROUND TO THIRD FLOOR PLANNING;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-1402 P3 EAST BLOCK - FOURTH FLOOR TO ROOF PLANNING;*
- *Drawing Reg. Ref. WLT-06-EB-XXX-DR-RAU-AR-1503 P3 UNIT TYPOLOGIES 3.*

Accordingly, please also refer to the *Architectural Design Statement* for detailed information in this regard.

4.1.8 Item No.8

Item No.8 States:

“The Creche is included in the Middle Block which will be built as part of the second phase of construction. While the phasing in general and location of the Creche by the village green and close to the entrance makes sense, the Creche may be required by the occupants of the first phase and its positioning may need to be reconsidered”.

Response

In response to the above, the proposed development is now planned to be constructed and delivered in one singular phase. Therefore, the creche will only be operational when the rest of the scheme is completed and ready for occupation. Please refer to the accompanying Architectural Pack prepared by Reddy Architecture and Urbanism for further information.

4.2 Drainage Section

4.2.1 Item No.1

Item No.1 States:

“A Confirmation of Feasibility is included in the Engineering Design Report which states that a wastewater connection is feasible subject to infrastructure upgrades. These upgrades include additional storage capacity at Wilton WWPS and real time telemetry controls. UE have advised that there are currently no plans for these works and as such the Applicant will have to fund the upgrades and the fee will be calculated at connection application stage. A condition will be attached to any grant of permission stating that prior to commencement of the works, the connection application will be finalised and the fee paid. There is a concern that the cost of the required upgrades could be deemed prohibitive by the Applicant.

A Statement of Design Acceptance from UE will be required with the full application. A Confirmation of Feasibility alone is not acceptable”.

Response

In response to the above, please refer to the Infrastructure Report and Flood Risk Assessment prepared by Barret Mahony Consulting Engineers. The Statement of Design Acceptance from Uisce Éireann is attached as Appendix IX of the accompanying report

4.2.2 Item No.2

Item No.2 States:

“The proposed drainage strategy includes permeable paving of various types in a number of locations throughout the development. Please note that permeable paving is not permitted in areas to be taken in charge. All storm sewers shall have a minimum nominal diameter of 225mm. The minimum gradient for 225mm diameter storm sewers is 1:200. There are 11Nr. lengths of proposed storm sewers with gradients less than 1:200. Gradients as shallow as 1:301 are shown on the longitudinal sections”.

Response

In response to the above, please refer to the Report and Drawing Pack prepared by Barret Mahony Consulting Engineers. Please refer to the accompanying drawings for further details regarding the proposed development’s Foul Drainage.

- Foul Drainage Longitudinal Section Sheet 1 of 2 (Drawing Ref. Reg. 23215-BMD-ZZ-XX-DR-C-12210);
- Foul Drainage Longitudinal Section Sheet 2 of 2 (Drawing Ref. Reg. 23215-BMD-ZZ-XX-DR-C-12211).

Permeable paving is not included in areas that are to be taken in charge, as per drawing DWG No. WLT-06- SW-ZZ- DR--RAU-AR- 1900, prepared by Reddy A+U.

4.2.3 Item No.3

Item No.3 States:

“A Flood Risk Assessment has been provided which has addressed the risk associated with storm water discharge from the site to the Glasheen River. The FRA states that the existing site forms part of the natural Glasheen River catchment and that discharge from the site will be controlled below Qbar to the 1-in-1 year runoff rate which the Design Team are satisfied will not exacerbate existing flooding issues at the Glasheen River”.

Response

In response to the above, please refer to the Infrastructure Report and Flood Risk Assessment prepared by Barret Mahony Consulting Engineers.

Section 3.0 of the Report includes a Flood Risk Assessment which has been carried out in accordance with the OPW publication *“The Planning System and Flood Risk Assessment Guidelines for Planning Authorities”*. Section 3.3.3 of the Report addresses the Council’s comments regarding the Glasheen Stream. This is outlined in further detail below.

“(i) The existing site forms part of the natural Glasheen Stream catchment currently, based on a review of the topography of the area. It is noted that the excess run-off from the site would flow overland to the ESB access road where existing gullies currently collect run-off from the road and transmit this via an internal surface water piped network within the ESB Networks compound, ultimately leading the Glasheen Stream. There is an existing SW outlet from the ESB Networks compound which has been identified at the Glasheen Stream, adjacent to the southwest corner of the ESB Networks compound. The outlet was heavily silted at time of inspection;

(ii) With regards to River Regime Protection, the GDSDS Regional Drainage Policies – Volume 2 document notes in section 6.3.1.2.2: “Rural runoff to rivers, when it occurs, is slow. To try and replicate this, urban runoff must be heavily constrained. Unrestrained runoff causes high velocities and erosion, affecting the morphology of the channel and the flora and fauna in the river.” It also notes, the relevant design criterion to address this issue is to “Restrain the rate of discharge to the receiving water to that of greenfield runoff for the site”;

(iii) With regards to River Flooding Protection, the GDSDS Regional Drainage Policies – Volume 2 document notes in section 6.3.1.3: “Flooding in rivers is exacerbated by urban runoff, particularly in catchments with a high degree of urbanisation.” Section 6.3.1.4 goes on to state “If all catchments are developed on the basis of reflecting the rural behaviour prior to development, both in terms of rate of runoff and volume of runoff, it is likely that the river will be protected effectively.” Where ‘long-term’ storage on site is not achievable, which is the case on this particular development, due to the space constraints arising from the need to protect existing mature trees, and the need to provide sufficient density of the development, the GDSDS notes : “It is possible that “long term” storage cannot be provided at certain sites. In these situations it is recommended that QBAR is used as the attenuation storage control requirement to ensure sufficient runoff is retained on site for extreme events;

This will tend to be a less economic solution, but is the only way to ensure that urban runoff does not exacerbate flooding in a river”;

(iv) The stormwater network design for the proposed development has estimated QBAR for the site at 10.81l/s. To further limit the risk of exacerbating flooding at the Glasheen Stream, the stormwater network discharge rate has been limited to less than $0.85 \times Qbar$ (i.e. a flow restriction of 9.0l/s has been designed for). Thus the design team have complied with the recommendations of the GDSDS and are satisfied the development will not exacerbate existing flooding issues at the Glasheen Stream”.

We submit to the Council that the proposed development’s potential impact on the Glasheen River has been robustly assessed. With the mitigation measures outlined above, it is not envisioned that the proposed development will result in exacerbating flooding issues at the Glasheen Stream near the subject site.

4.3 Additional Documentation Requested

4.3.1 Item No.1

Item No.1 States:

“Construction Environmental Management Plan – A Construction Environmental Plan shall be submitted, this shall provide details of intended construction practice for the development, including phasing of the works, piling and rock breaking requirements, mitigation measures for noise and vibration, dust and air quality. Detail in relation to traffic management, lighting, pedestrian safety, water quality protection measures and hours of work to be included. High level details have been included in Section 3 of Construction and Operational Waste Management Plan, however, further site-specific details as listed above should be included within Construction Environmental Management Plan”.

Response

In response to the above, please refer to the *Traffic and Transportation Assessment & Mobility Management Plan*, prepared by ILTP Consulting Engineers. Section 10 of the Report contains an *Outline Construction Stage Traffic Impact Assessment and Mobility Management Plan*. The Report sets out the construction which will be generated in a singular phase. The report also outlines the proposed construction operation times and the potential impact the construction phase may have on the existing road network.

Additionally, please refer to the *Resource Waste Management Plan* prepared by Malone O'Regan Environmental. This report details how construction materials and waste will be managed during the construction phase of the proposed development to ensure compliance with the applicable waste legislation and policies.

The Reports outlined above are intended to be read alongside the Construction Management Plan prepared by DCON Safety Consultants. Which outlines in further detail the resource waste management plan, noise, vibration, dust, emissions, site access and traffic management, and so on.

The documentation submitted as a part of this planning application apprehensively addresses the Council's comments and outlines the intended construction practices and management for the proposed development.

4.3.2 Item No.2

Item No.2 States:

"Construction and Operational Waste Management Plan – Working hours listed Construction and Operational Waste Management Plan for Mondays to Fridays to be amended with the following: Working hours during site clearance and construction shall be restricted to 06:00-18:00 hours on Mondays to Fridays and to 08:00-16:00 hours on Saturdays. Activities outside these hours shall require the prior approval of the Planning Authority.

Operational Waste Management Plan provided. However further clarity is required in relation to the following;

- *Apartment Blocks – Calculations are to be prepared to show quantities of waste produced versus the volume of waste storage provided in each storage area. Drawings of Bin Stores for East Block to be provided;*
- *Further details required in relation to waste storage for the childcare facility – calculations are to be prepared to show quantities of waste produced versus the volume of waste storage provided. Location of childcare facility bin storage to be identified and confirm if management company or childcare facility operator will present this waste for collection. Drawings of bin storage area to be provided;*
- *Further detail required in relation to bin storage for townhouses within this development. Drawing WLT-02-TH2-L00-DR-RAU-AR-1102 currently shows 2 bins within townhouse bin stores- dimensions to be reviewed to ensure bin stores can cater for required waste storage volume calculated. Waste Collection companies often supply 3 bins which also aligns with example of bin segregation proposed in Figure 5-1, this should be accounted for in storage provided. Calculations are to be prepared to show quantities of waste produced versus the volume of waste storage provided for townhouses;*
- *Further detail required on end of terrace houses bin storage locations; these do not appear to be included on – Drawing WLT-02-TH2-L00-DR-RAU-AR-1102;*
- *For the calculation of waste produces above, the developer should refer to the British standards BS 5906:2005 in relation to waste management in buildings to ascertain both waste generated, and capacity required for development;*
- *All Bin Storage related drawings to be Appended to Operational Waste Management Plan;*
- *Swept Path Drawing for Refuse Vehicle, Drawing has been provided – Drawing to be amended if required once location of childcare facilities bin store location is confirmed".*

Response

In response to the above, please refer to the Construction and Operation Waste Management Plan, prepared by Malone O'Regan Environmental. The report addresses the Council's comments in full and outlines the intended construction practices and management for the proposed development.

4.3.3 Item No.3

Item No.3 States:

“Noise Impact Assessment – provide additional detail in Section 4.4.1 and 5.11.4 in relation to noise level within apartments at the upper floors beneath the centralised heating units that are located on the rooftops. A data sheet of a potential centralised heating unit showing d8 rating would be beneficial;

Nosie Impact Assessment to take account of the 3 subsections within the site with particular attention to sub stations within west and middle block that are adjacent to and beneath apartment units on the ground floor and first floor;

Similarly, any potential noise from the Meter & Comms room, Tank Room or AOVs should be addressed;

Provide additional detail on the noise level within the amenity areas relative to the standards with particular attention to the amenity area in the eastern section of the site and the eastern apartment blocks. Reference should be made both to night and daytime levels. The report shall outline how the Noise limits as outlined in WHO Environmental Noise Guidelines for the European Region (WHO,2018) have been considered;

Existing and future noise zone mapping for the development site would be beneficial”.

Response

In response to the above, please refer to the *Noise Impact Assessment*, prepared by Malone O’Regan Environmental. The report addresses the comments received accordingly. The accompanying Report includes an assessment of the existing baseline noise of the site, the proposed development’s potential impact during construction and operational phases, and the noise generation within the proposed developments itself. In addition, the Report outlines the application of good acoustic design processes that have been implemented within the proposed development.

4.3.4 Item No.4

Item No.5 States:

“Air Quality Report – Due to the close proximity of the site to the N40 and Sarsfield Road related traffic, there remains concerns in relation to Air Quality in the long-term affecting the site and future development. As a result, the developer shall commence on-site Air Quality monitoring for at least a 2 month period. Monitoring shall be carried out when schools and university traffic are present. Monitoring to include NO2, PM10, and PM2.5 as a minimum. The location of the Air Quality Monitoring stations shall reflect the closest amenity area and residence to the Sarsfield Road and N40;

The final report shall outline the air quality for the future residents within the development and at both the eastern block of apartments and the closest amenity areas;

The report shall also outline how the WHO Global Air Quality Guidelines 2021, limits and interim targets have been considered. Mitigation measures as required shall be outlined within the report;

Noted – Report has been submitted as “Preliminary” while awaiting AADT information with Final Report to follow”.

Response

In response to the above, please refer to the Air Quality Assessment Report, prepared by Malone O'Regan Environmental.

In line with the local authorities' LRD Opinion, the applicant has commissioned a comprehensive *Air Quality Assessment Report*, which includes a three-month survey period. Monitoring began on December 11th, 2024, and concluded on the 26th of February 2025, meeting the Council's requested timeline.

The Report's results outline that the construction phase of the proposed development poses a medium risk of resulting in dust-soiling effects arising on surrounding sensitive receptors and has a low risk of resulting in PM10 exposure effects arising on surrounding sensitive receptors. Section 5.1 of the accompanying report outlines the appropriate mitigation measures, to offset any potential impacts of the proposed development. We note that these impacts will be short term, while construction is underway, and measures to reduce dust will be implemented as per construction management best practice. Future air quality for residences and amenities in and around the proposed development site will meet EU AQS following construction. Implementation of the Cork City Air Quality Strategy 2021-2026 could reduce air quality effects arising from existing and future traffic within Cork City and lower background concentrations surrounding the subject site.

Please refer to the accompanying documentation for further information.

4.3.5 Item No.5

Item No.5 States:

“Energy and Climate Action Statement – Energy and Heating Strategy Comparison Report has been provided. The report provides significant detail, however, it is not clear from the report which heating strategy has ultimately been selected for the apartment block developments. Further clarity should also be provided confirming the heating strategy for both town houses and apartment blocks and location of any external equipment;

Plan Drawings should indicate location of the proposed central heating units (this appears to be what has been selected for drawing purposes). Please confirm if this CHU is located within “Domestic Water Tank Room”. A data sheet of a potential centralised heating unit showing dB rating would be beneficial;

Any noise emissions from the proposed heating systems should be included within the Noise Impact Assessment to identify any potential issues in relation to noise within the apartment/townhouses. Particular attention should be given to any apartments that

may be located underneath centralised heating pumps located on the rooftops. Alternatively, if the heating systems are contained within the apartments, further analysis would be required in the Noise Impact Assessment. Details of heating system for townhouses to be included in Noise Impact Assessment”.

Response

In response to the above please refer to the accompanying Energy and Heating Strategy Comparison prepared by EDC Engineering. The report outlines a comparison and feasibility study which is in line with the *Development Plan’s* requirements. the following is stated.

“In line with Cork City Council policy objectives and regional policy objective RPO 7.38 set out in the Regional Spatial & Economic Strategy (RSES) 2019-2031, a feasibility study for district heating systems was carried out for the proposed development. This study includes a comparison of three different heating strategies, including two standalone systems and one centralised heating systems;

For a fair comparison, early-stage Part L block compliance calculations were carried out on each heating strategy to determine the developments estimated primary energy, CO2 emissions, delivered energy, running costs and PV requirements. The study also determines if the heating strategy will achieve a 10% primary energy improvement and determines what is required for it to be achieved. Third party district heating and waste heat networks outside the development’s curtilage have been excluded from this study, as it was found there is no current heat networks in the area and the development is not located in a SEAI district heating candidate area, as shown in Figure 2 above”.

The proposed development aims to implement a Centralised Heating System Strategy for the apartments. The heating approach for the townhouses will be finalised during the detailed design phase, but the current proposal suggests using Air Source Heat Pumps (ASHP) and Central Mechanical Extract Ventilation (CMEV).

The Central Heating Unit (CHU) for the apartments will be situated on the roof of each block and has already been incorporated into Reddy’s Layouts. Buffer tanks, circulation pumps, and other related components will be in the heating plant room adjacent to the water tank room. Please note that all equipment will be placed on the roofs of the apartment blocks. The plant room layouts will be confirmed in the detailed design phase.

Additionally, please refer to the accompanying Technical Note prepared by Wave Dynamics Acoustic Consultants. This note includes a preliminary building acoustics assessment, evaluating internal noise levels associated with heat pump units, based on the current design and drawing details at the planning stage. Noise levels have been assessed using data provided by the equipment manufacturer.

4.3.6 Item No.6

Item No.6 States:

“Noted – Technical Note has been provided to date in relation to Contaminated Land. As outlined by Applicant, the Technical Report will be submitted with planning

application including site investigation work and interpretation of results. Mitigation measures as required also to be included in the report”.

Response

In response to the above please refer to the accompanying *Site Investigation Summary Report* prepared by EDC Engineering, which addresses this request in detail and in full.

4.3.7 Item No.7

Item No.9 States:

“Resource Waste Management Plan – The predicted quantities of waste for this development should be outlined in final submission. Tab 5-1 of the submitted Resource Waste Management Plan provides values for typical C&D projects; this should be amended based on the proposed development for planning submission including cut and fill volumes. Refer to Appendix D of the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021) for further details;

The Resource and Waste Management Plan should also outline

- *The type, quantity and waste codes of hazardous waste generated from the demolition and construction process;*
- *The type, quantity and waste codes of non-hazardous waste generated during the demolition and construction process;*
- *Submit the names of waste collectors to be engaged in waste movement as well as destination waste facilities where waste will be taken off-site for recovery/disposal”.*

Response

In response to the above, please refer to the Resource Waste Management Plan prepared by Malone O'Regan Environmental. This report details how construction materials and waste will be managed during the construction phase of the proposed development to ensure compliance with the applicable waste legislation and policies.

4.4 Strategic Transport Section

4.4.1 Item No.1

Item No.1 States:

“The pedestrian accessibility to the proposed development is good, however the proposed development should include for a footpath connection to the existing pedestrian network in Cardinal Court to the west of the development”.

Response

In response to the above please refer to the Architectural Design Statement prepared by Reddy Architecture + Urbanism. We would like to highlight to the Local Authority a footpath connection to the existing pedestrian network in Cardinal Court has been provided within the site, allowing future provision should land to the west be secured at a later date.

4.4.2 Item No.2

Item No.2 States:

“The 4 parking spaces located to the south of the east block should be removed and access restricted to this public realm space to pedestrians/cyclists and emergency vehicles only. There is the potential that drivers will parking indiscriminately in this key public realm space”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. In addition, the documentation prepared by ILTP Consulting Engineers also addresses this comment. In accordance with the Local Authorities request the 4 no. parking spaces to the south of the east block have been removed.

4.4.3 Item No.3

Item No.3 States:

“Consider the repositioning of the footpath to the back of the parking space along the southern boundary of the proposed development, as noted in the figure below. In addition, the provision of a raised pedestrian ramp should be considered at the pedestrian crossing”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism, where this request has been adopted. In addition, please also refer to the documentation prepared by Park Hood Chartered Landscape Architects.

Please refer to following plans for further information;

- *Hardscape Plan (Drawing Ref. Reg. 7848-PHL-SW-XX-DR-L-1200-00), prepared by Park Hood Chartered Landscape Architects;*
- *Site Layout Plan (Drawing Ref. WLT-06-SW-ZZ-DR-RAU-AR-1003), prepared by Reddy Architecture + Urbanism.*

4.4.4 Item No.4

Item No.4 States:

“The proposed provision of cycle parking is line with the 2022-2028 Cork City Council Development Plan standards at 0.5 cycle spaces per unit, however a higher cycle

parking standard should be considered bearing in mind the relatively low car parking standard applied to the proposed development. The East Block is poorly served with cycle parking and the provision of additional cycle parking (to replace the 4 parking spaces} close to this building would be welcome”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. We would like to highlight to the Local Authority that the proposed development has been revised and now includes a provision of 503 no. bicycle parking spaces. Therefore, the proposed development now exceeds the *Development Plan* requirements.

4.4.5 Item No.5

Item No.5 States:

“The use of the existing signalised junction serving the ESB entrance is supported, however there is an opportunity to widen the proposed cycle lanes on the ESB access road through some localised narrowing of the existing traffic lanes”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. In addition, please refer to the accompanying Footpath and Cycle Path Details (Drawing ref. reg. 23215-BMD-ZZ-XX-DR-C-12110), prepared by Barrett Mahony Civil and Structural Consulting Engineers.

4.4.6 Item No.6

Item No.6 States:

“The proposed quantum of parking is supported as the immediate area is well served by public transport and has numerous local services nearby”.

Response

The above comment from the Local Authority is noted.

4.4.7 Item No.7

Item No.7 States:

“A car park management plan should be submitted presenting the location of any spaces set aside for the disabled/ mobility impaired, electric vehicle charging locations, car club, set down spaces, access control measures, etc... It should be noted that no parking spaces will be assigned to any particular residential unit and that all parking will be a shared resource”.

Response

In response to the above please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers. Section 5.5 of the report outlines the proposed developments Car Parking Management Strategy.

4.4.8 Item No.8

Item No.8 States:

“The input data and associated findings with respect to the submitted transport assessment are generally acceptable and no further clarification is required”.

Response

The above comment from the Local Authority is noted.

4.4.9 Item No.9

Item No.9 States:

“The proposed mode share targets presented in the transport assessment should be revisited and reflect on the existing mode share split for the area utilising information from Census 2020 and the proposed provision of cycle and car parking on site”.

Response

In response to the above please refer to the accompanying Quality Audit Report, prepared by MHL Consulting Engineers. Section 3.1 of the report outlines findings from the Census 202 SAP Data and how this has informed the proposed developments.

4.4.10 Item No.10

Item No.10 States:

“Reference is made to a public transport survey, if this information is available its presentation within the transport assessment would be welcome”.

Response

In response to the above please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers. Accordingly, Section 6.5 of the Report outlines the results of the Public Transport Survey.

4.4.11 Item No.11

Item No.11 States:

“Could additional details be provided with respect who would engage the proposed Travel Plan Co-ordinator and how this role will be financed going forward”.

Response

In response to the above please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers. Accordingly, Section 9.7 of the Report outlines the proposed development’s travel plan and the appointment of a Travel Plan Coordinator. The following is stated.

“9.7.2 The appointment of an active Travel Plan Coordinator is regarded as the principle means of developing and implementing a Travel Plan / MMP;

9.7.3 It is proposed that a Travel Plan Coordinator be appointed for the development by the management company, whose objective will be to encourage and facilitate sustainable travel for residents and visitors to the development;

9.7.4 The Travel Plan Coordinator will have a role in promoting and monitoring the Travel Plan / MMP. The Travel Plan Coordinator role will involve the ongoing implementation of the Travel Plan initiatives”.

The appointment of a Travel Plan Coordinator will be the responsibility of the proposed development’s management company.

4.4.12 Item No.12

Item No.12 States:

“The submitted Mobility Management Plan makes reference to cycle parking provided for each residential unit, confirmation required with respect to the final allocation of bike parking within the scheme”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. Accordingly, the provision and location of the bicycle parking are explicitly shown in the Proposed Site Layout – Ground Level (Drawing Ref. Reg. WLT-06-SW-ZZ-DR-RAU-AR-1003).

4.4.13 Item No.13

Item No.13 States:

“The car park management plan should identify the spaces set aside for the proposed car club”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. Please refer to the accompanying drawing Proposed Site Layout – Ground Level (Drawing Ref. Reg. WLT-06-SW-ZZ-DR-RAU-AR-1003). Accordingly, the plan outlines 2 no. Go-Car spaces near the entrance of the site.

In addition, please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers.

4.5 Community, Culture and Placemaking Section

4.5.1 Item No.1

Item No.1 States:

“Urban Road Design – Pedestrians; The Applicant is required to provide and submit details of the cycle lane and pedestrian provision tie-in to the existing infrastructure on Sarsfield Road”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. Please refer to the accompanying drawing Proposed Site Layout – Ground Level (Drawing Ref. Reg. WLT-06-SW-ZZ-DR-RAU-AR-1003).

In addition, please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers. The Report outlines the proposed development’s compliance with the *Design Manual for Urban Roads and Streets (DMURS)*.

4.5.2 Item No.2

Item No.2 States:

“Internal Road Design – Pedestrians; The applicant is required to demonstrate drivers accessing the internal access road from the ESB Road have intervisibility of drivers carrying out reverse manoeuvres from the first grouping of car parking bays”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. Please refer to the accompanying drawing Proposed Site Layout – Ground Level (Drawing Ref. Reg. WLT-06-SW-ZZ-DR-RAU-AR-1003).

In addition, please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers and the accompanying documentation prepared by Barret Mahony Civil and Structural Consulting Engineers.

4.5.3 Item No.3

Item No.3 States:

“Internal Estate Road – Pedestrian Provision; The applicant is required to demonstrate continuous pedestrian provision for residents accessing the development access junction and continuing to, for example Town House Block A or the proposed pedestrian link to Cardinal Court, located to the west of the development site. The provision would also include where applicable priority crossing or dropped kerbing/tactile paving to access these locations. It is unclear if pedestrians have priority for this route through the site”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. Please refer to the accompanying drawing Proposed Site Layout – Ground Level (Drawing Ref. Reg. WLT-06-SW-ZZ-DR-RAU-AR-1003).

In addition, please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers and the accompanying documentation prepared by Barret Mahony Civil and Structural Consulting Engineers. Again, future provision has been facilitated within the site to Cardinal Court.

4.5.4 Item No.4

Item No.4 States:

“Taking in Charge and/or Management Company; The Applicant is required to confirm the areas, if any, proposed to be subject to a taking in charge application and/or the areas proposed to be maintained by a management company/equivalent”.

Response

In response to the above please refer to the documentation prepared by Reddy Architecture + Urbanism. Please refer to the accompanying drawing Taking in Charge Site Layout (Drawing Ref. Reg. WLT-06-SW-ZZ-DR-RAU-AR-1900).

4.5.5 Item No.5

Item No. 5 States:

“Quality Audit - An Independent Quality Audit which should include:

- 1. Road Safety Audit;*
- 2. Access Audit;*
- 3. Walking Audit;*
- 4. Cycle Audit.*

These shall be carried out at the developer’s expense for the development in accordance with the Design Manual for Urban Roads and Streets (DMURS) Guidance and TII (Transport Infrastructure Ireland) standards.

The Quality Audit team shall be approved by the Planning Authority and all measures recommended by the Auditor should be undertaken unless the Planning Authority approved any departure in writing. A feedback report should also be submitting providing a response to each of the items. The objective of the Quality Audit is to demonstrate that appropriate consideration has been given to all of the relevant aspects of the design. DMURS states that the intention of a Quality Audit is an assessment toll that highlights the strengths and weaknesses of a design and a document process of how decisions were made. The UK Department for transport notes the key benefits of a Quality Audit as

- *A transparent process that demonstrates that the needs of all user groups and the design objectives;*
- *Enables the projects objectives to be delivered by putting in place a check procedure;*
- *Contributes to cost efficiency in design implementation;*
- *Encourages engagement with stakeholders*

The Applicant is requested to prepare an independent Quality Audit.”.

Response

In response to the above please refer to the accompanying Quality Audit Report, which provides detailed consideration of the above noted points, prepared by MHL Consulting Engineers.

4.6 Operations Directorate – ITS Section

4.6.1 Item No.1

Item No. 1 States:

“Refer to Rev 10 of the CCC public lighting design guidance document for the design of public lighting on this scheme. Link for the latest version of the document can be found on the CCC public lighting page or using the link below”.

Response

In response to the above please refer to the accompanying *Outdoor Lighting Report* and the *Public Lighting Layout Plan* (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.2 Item No.2

Item No. 2 States:

“Public Lighting shall be designed in line with Irish and European Standards for Road lighting. Please refer to EN- 13201-1 to 5. Electrical Installation shall meet the standards laid out in the National Rules for Electric Installations document IS-10101”.

Response

In response to the above please refer to the accompanying *Outdoor Lighting Report* and the *Public Lighting Layout Plan* (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.3 Item No.3

Item No. 3 States:

"Urban Cycle Infrastructure shall be designed in accordance with the NTA's Cycle Design Manual (COM). Guidance on the lighting of cycle tracks is provided in the ILP Technical Report PLG-23 "Guidance on the lighting of cycle tracks is provided in the ILP Technical Report No. 23 "Lighting for Cycling Infrastructure".

Response

In response to the above please refer to the accompanying *Outdoor Lighting Report* and the *Public Lighting Layout Plan* (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.4 Item No.4

Item No. 4 States:

"Refer to TII document DN-LHT-03038 "Design of Road Lighting for the National Road Network" for the design of public lighting on TII managed national road routes. This document also outlines the requirements for lighting at Pedestrian Crossings and where additional lighting shall/may be required. Please refer to section 5.8 within the document".

Response

In response to the above please refer to the accompanying *Outdoor Lighting Report* and the *Public Lighting Layout Plan* (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.5 Item No.5

Item No. 5 States:

"Please refer to the latest edition of the guidelines for Managing Openings in Public Roads (The Purple Book) for civils work in relation to traffic Signals or Public Lighting. This shall be read in conjunction with the CCC Public Lighting Design Guidance Document and any relevant Manufacturers Technical datasheets".

Response

In response to the above please refer to the accompanying *Outdoor Lighting Report* and the *Public Lighting Layout Plan* (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.6 Item No.6

Item No. 6 States:

“Rear louvres will be required on the following lanterns: IOA,2B,15B,1B,3B, 12B,4B, 13B, 7B,37B,23B,25A,20A”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.7 Item No.7

Item No. 7 States:

“Front louvres will be required on the following lanterns: 11B,56D,57D,48D,49D,35D,51D,53D”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this in formation of the proposed design.

4.6.8 Item No.8

Item No. 8 States:

“Lantern IOA appears to be placed in private property”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. This has been amended accordingly.

4.6.9 Item No.9

Item No. 9 States:

“Rear of parking area is currently not illuminated”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. Accordingly, all the proposed parking areas have appropriate lighting.

4.6.10 Item No.10

Item No. 10 States:

“Lantern 14A, 11B, 8B, 17A, 18A, 20A, GA and 36A currently placed in shrubbery, please confirm that this will be a low height shrub to allow for future access and maintenance”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this information of the proposed design.

4.6.11 Item No.11

Item No. 11 States:

“Lanterns 6A and 21A are currently positioned at the front of the footpath, these are to be planned at the rear of the footpath to avoid any potential collisions”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this information of the proposed design.

4.6.12 Item No.12

Item No. 12 States:

“Grid 1 is to be reduced to a P4 lighting class”.

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this information of the proposed design.

4.6.13 Item No.13

Item No. 13 States:

“Grid 2 is to be broken down into smaller grids, the spine road is to be illuminated to a P3, the branching roads are to be illuminated to a P4, outdoor areas are to be illuminated to P5;

- *Sub grid one, spine road;*
- *Sub grid two, branching roads;*

- *Sub grid three, footpath access from the main road Sub grid 4, outdoor areas and footpath to the north;*
- *Current grid is too large;*
- *Please confirm the above layout, arrows are within grass verges”.*

Response

In response to the above please refer to the accompanying Outdoor Lighting Report and the Public Lighting Layout Plan (Drawing Ref. Reg C23024-EDC-XX-XX-DR-E-3000), prepared by EDC Consulting Engineers. EDC have had regard to this information of the proposed design.

4.7 Parks and Recreation Department Section

4.7.1 Item No.1

Item No. 1 States:

“A bat roost for the soprano pipistrelle has been identified on site within a number of trees on site. The roost will be retained as stated within the EcIA”.

Response

In response to the above please refer to the accompanying *Ecological Impact Assessment (EcIA)* prepared by Malone O’Regan Environmental. In addition, the planning application is accompanied by a Bat Report, which can be found in Appendix A of the EcIA. Roosts are protected accordingly.

4.7.2 Item No.2

Item No. 2 States:

“Mitigation measures need to be in place to protect the soprano pipistrelle roost on site and the other bat species who currently utilise the site. Any lighting for the development needs to be designed to reduce any extra lighting that would affect the bats leaving and returning to the roost”.

Response

In response to the above please refer to the accompanying Ecological Impact Assessment (EcIA) prepared by Malone O’Regan Environmental. In addition, the planning application is accompanied by a Bat Report, which can be found in Appendix A of the EcIA. The proposed lighting scheme has been informed by this request accordingly.

4.7.3 Item No.3

Item No. 3 States:

“There is a risk to this bat roost could fail as the landscape plan highlights the majority of the trees are being removed for the proposed development. See map below (Fig. 1).

The current landscape plan will create fragmentation and isolation for this soprano pipistrelle roost and the other bat species that currently utilise this site by significantly reducing their foraging areas and other potential roosts sites. As stated by the European Commission it is an offence to cause the deterioration of a bat roost by such human activity as the proposed development. (European Commission, 2021a; Section 2.3.4 d). Mitigation measures need to be in place to reduce the impact of the development on the roost such as avoiding any light close to the roost, have shaded flight paths to the roost such as woodlands and hedgerows”.

Response

In response to the above please refer to the accompanying Ecological Impact Assessment (EclA) prepared by Malone O’Regan Environmental. In addition, the planning application is accompanied by a Bat Report, which can be found in Appendix A of the EclA. Mitigation measures have been adopted accordingly, as per the updated landscape and lighting strategies. Tree retention has also been prioritised as a part of the proposed design of the scheme, while trying to comply with requirements of ESB adjoining from a boundary treatment perspective.

4.7.4 Item No.4

Item No. 4 States:

“Also, the NPWS need to be informed of the roost and the measures in place to protect this bat roost as it is an offence to disturb any bat roosts under the Wildlife Act, 1976 and amendment 2000 and EU legislation”.

Response

In response to the above please refer to the accompanying Ecological Impact Assessment (EclA) prepared by Malone O’Regan Environmental. In addition, the planning application is accompanied by a Bat Report, which can be found in Appendix A of the EclA. It is noted that as we will not be disturbing the known bat roosts, no derogation licences are required in this regard. This was confirmed through discussion with the Conservation Ranger via email on the 30th of September 2024. If bats are found in other trees closer to the felling date and the start of works on site, the NPWS will be contacted, and appropriate measures will be taken.

4.7.5 Item No.5

Item No. 5 States:

“The lighting scheme for the proposed development needs more work on reducing and eliminating lighting where the soprano pipistrelle roost is and along the flight paths of bats that utilise the site. The guidance note on Bats and Artificial Lighting at Night should be followed to improve the lighting scheme for the proposed development for nocturnal wildlife”.

Response

The lighting scheme has been updated accordingly, as already noted above.

In response to the above please refer to the accompanying Ecological Impact Assessment (EclA) prepared by Malone O'Regan Environmental. In addition, the planning application is accompanied by a Bat Report, which can be found in Appendix A of the EclA.

4.7.6 Item No.6

Item No. 6 States:

“Under objective 6.22f. Cork City Council will seek, where appropriate, to enhance the linear habitat connectivity, including the interconnection and enhancement of: Woodlands, gardens, open spaces, fields and hedgerows. This objective is not being meant with the current removal of the tree lines within the landscape design. A full breakdown of the percentage of trees being removed and trees being retained need to be stated with reports going forward and the reasoning behind why the trees are being removed. Also, a breakdown of the compensation planting to be installed with quantities and percentage of the future canopy cover”.

Response

In response to the above please refer to the accompanying the Landscape Management and Maintenance Plan prepared by Park Hood Chartered Landscape Architects. A detailed tree survey has been carried out to establish the species, size and condition of all existing trees on the site. The survey also establishes a Root Protection Area to define the minimum distance that development can encroach on existing trees to ensure successful retention within the development proposal. The scheme layout has been developed to retain key mature and specimen trees where possible, while also complying with requirements from the adjoining land owner (ESB). Site restrictions that occur from the aim of retaining the maximum number of existing mature trees as possible mean that the plot sizes for the buildings are reduced. Therefore, the apartment buildings have heights ranging from five to six storeys to accommodate an appropriate density and number of residential dwellings, avoiding development sprawl that may involve the loss of many more trees.

The protection of the trees to be retained is outlined in the detail in the accompanying landscaping drawings, please refer to Development Impact Drawing (Drawing Ref. 7848-PHL-SW-XX-DR-L-0001). Extensive consultation has taken place with ESB Networks since the receipt of the CCC opinion document. The loss of trees along the southern boundary due to the ESB requirement for a continuous brick wall in this location was a major point of agreement with the adjoining landowner. Accordingly, the statistics regarding the trees are:

Total Number of Trees: 123

- Trees to be retained: 15 (12.2%)
- Trees to be removed: 107 (87.0%)

Breakdown of Trees to be Removed (107 trees):

- Category B: 20 trees (18.7% of removed trees)
- Category C: 81 trees (75.7% of removed trees)
- Category U: 6 trees (5.6% of removed trees)

The additional trees to be felled are due to the requirement from ESB to install a concrete plinth under the base of the boundary treatment to prevent undermining.

This plinth will be installed using hand digging techniques in compliance with BS5837:2012 where it is located within the Root Protection Area of the existing trees. Also, in line with BS5837:2012, to ensure the protection of retained trees during construction, a vertical and horizontal framework of scaffolding with weldmesh panels will be implemented. Additionally, scaffolding will be utilised within the designated zone of protection for trees.

Where scaffolding is to be erected within this zone, the following protective measures will be undertaken:

Ground Protection

- A 50 mm layer of sharp sand will be applied to the undisturbed ground surface. This will be overlaid with a geotextile membrane to prevent soil disturbance.
- Sturdy planks, such as closely side-buttressed scaffold boards, will be placed over the membrane to distribute weight evenly.

Scaffolding Construction

- All scaffolding will be constructed on top of the planks to minimize ground compaction and root damage.
- Where scaffolding is erected on suspect or unconsolidated ground, additional stays will be installed as directed by a competent person.

Protective Fencing

- A protective barrier, compliant with BS5837:2012, will be maintained between the scaffolding and adjacent trees to prevent accidental damage.
- All works will adhere strictly to the guidelines set out in BS5837:2012 to ensure the preservation of tree health and structural integrity throughout the construction process.

It is to be noted and acknowledged that the removal of a number of trees on site is unavoidable in this instance. However, the proposed development underwent a rigorous design process to ensure the retention of as many trees as possible. For further details, please refer to *Drawing Ref. 7848-PHL-SW-ZZ-DR-L-0001 Development Impact*, prepared by Park Hood Chartered Landscape Architects. Page no. 38 of the Landscape Strategy Report outlines the landscape specification for the residential development, including the proposed tree, hedge, shrub, and turf planting. For further information, please refer to *Drawing Ref. 7848-PHL-SW-ZZ-DR-L-1100*.

4.7.7 Item No.7

Item No. 7 States:

“Only two alien invasive species have been recorded on site that are not third schedule alien invasive plant species, but due diligence needs to followed not to spread them and to managed and treated onsite. An IAPs management plan to be developed and included within the CEMP”.

Response

In response to the above please refer to the accompanying Ecological Impact Assessment (EcIA) prepared by Malone O'Regan Environmental.

The Site was visually assessed for the presence of any noxious / invasive species that are regulated under the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374/2024) [29] such as Japanese knotweed (*Reynoutria japonica*) and Himalayan balsam (*Impatiens glandulifera*). The Site was also assessed for the presence of non-regulated invasive species that have the potential to impact local biodiversity.

In addition, an assessment was carried out of the potential for the Site to support any other species considered to be of value for biodiversity, including those that were identified as occurring locally based on the findings of the desktop study and professional judgment. A detailed Construction Environmental Management Plan ('CEMP') will be prepared and submitted to the planning authority by the appointed contractor in advance of works commencing at the Site, which will have regard to Guidelines on the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads.

Medium impact invasive species Butterfly Bush and Winter Heliotrope were identified within the Site. These species are not currently regulated under the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374/2024). To mitigate against the unintentional introduction of invasive species during construction, the following biosecurity measures will be implemented. These measures are in line with TII Guidance for the Management of Noxious Weeds and Non-Native Invasive Plant Species:

- All vehicles, machinery and any other equipment that may be used for the works will be washed prior to its use onsite to prevent the import of plant material and seeds;
- Before machinery or equipment is unloaded at the Site, equipment will be visually inspected to ensure that all adherent material and debris has been removed;
- Any vehicles and machinery that are not clean will not be permitted entry to the Site;
- All materials to be imported to the Site, including additional planting, will be sourced from a reputable supplier and records of all material / supplies to the Site will be maintained; and,
- In advance of works, all site personnel will receive an induction regarding invasive species.

This is integrated into the CEMP accordingly.

5.0 APPENDIX D OF CORK CITY COUNCILS LRD OPINION

5.1 Letter from the Irish Aviation Authority (IAA)

5.1.1 Item No.1

Item No. 1 States:

“The Applicant should be required to engage with DAA Cork Airport, the air navigation service provider Air Nav Ireland and the HSE Aero-Medical and Special Operations Section, Health Service Executive to undertake a preliminary screening assessment to confirm that the proposed development and any associated cranes that would be utilised during its construction would have no impact on the safety of flight operations at Cork Airport or helicopter operations to/from Cork University Hospital.

In the event of planning consent being granted, the applicant should be conditioned to contact DAA Cork Airport and HSE/Cork University Hospital of intention to commence crane operations with at least 30 days prior notification of their erection”.

Response

In response to the above please refer to the accompanying Aeronautical Assessment Report prepared by O’Dwyers and Jones Design Partnership. Please refer to the detailed response above in Section 3.15.

5.2 Letter from Transport Infrastructure Ireland

5.2.1 Item No.1

Item No. 1 States:

“Any proposals related to future public transport provision are a matter for the NTA”.

Response

The above comment from the Local Authority is noted.

5.2.2 Item No.2

Item No. 2 States:

“Consultations should be had with the relevant National Roads office with regard to locations of existing and future transport schemes and /or national road improvements schemes in the vicinity. The developer should have regard to road or transport schemes in the area”.

Response

In response to the above please refer to the accompanying Traffic and Transportation Assessment & Mobility Management Plan prepared by ILTP Consulting Engineers. The proposed scheme has had regard to road and transport schemes in the area, as relevant.

5.2.3 Item No.3

Item No. 3 States:

“The Authority's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of

the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. The developer should in particular have regard to any potential cumulative impacts on relevant road networks including taking account of both the operational and construction periods on the national road junction”.

Response

In response to the above please refer to the accompanying Traffic and Transportation Assessment & Mobility Management Plan prepared by ILTP Consulting Engineers. This outlines in detail how the proposed scheme has had regard to impact on the surrounding road network both during construction and post completion accordingly.

5.2.4 Item No.4

Item No. 4 States:

“The Council should ensure that further supporting transport analysis should consider;
a) A mobility management plan should accompany the transport assessment;
b) Modal share targets should be outlined and how any PT modal share is accommodated;
c) Measures proposed to reduce care dependency should be outlined;
d) Detailed phasing proposals of development with associated transport infrastructure provision is required;
e) Consider and address cumulative impacts of other development and impacts on limited national road capacity in the area;
f) Mitigation measures should be aligned with construction and operational phases with phasing of road infrastructure improvements and required public transport interventions; all clearly outlined”.

Response

In response to the above please refer to the accompanying Traffic and Transportation Assessment & Mobility Management Plan prepared by ILTP Consulting Engineers. All of the above item's a to f have been included in documentation enclosed. In addition, please refer to the documentation prepared by MHL Consulting Engineers.

5.2.5 Item No.5

Item No. 5 States:

“The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required”.

Response

In response to the above please refer to the accompanying Combined Stage 1 and 2 Road Safety Audit prepared by MHL Consulting Engineers.

5.2.6 Item No.6

Item No. 6 States:

“The developer is advised that any additional mitigations/works/structures required as a result of assessments should be funded by the developer”.

Response

The above comment from the Local Authority is noted.

5.3 Letter from Uisce Éireann

5.3.1 Item No.1

Item No. 1 States:

“Uisce Éireann notes a Confirmation of Feasibility (COF) was issued for the site on 8th of December, 2023 (CD23007638) for a proposed development of 391 no. residential units. In relation to a water connection the COF stated a connection is feasible without infrastructure upgrade by UE;

In relation to a wastewater connection the COF stated a connection is feasible subject to upgrades It further notes, in order to accommodate the proposed discharge from the Development, upgrades to the existing Wilton Wastewater Pumping Station are required to provide additional network storage capacity. It will also be necessary to provide real time telemetry controls at Wilton Wastewater Pumping Station to manage the discharge of flow to the downstream network and prevent detriment to the existing network. UE does not currently have any plans to undertake these upgrade works, therefore the applicant will be required to fund these local network upgrades. The fee of these works will be calculated at a connection application stage”.

Response

In response to the above please refer to the accompanying Infrastructure Report and Flood Risk Assessment prepared by Barret Mahony Civil and Structural Consulting Engineers. A COF has been provided accordingly. The latter comment from the Uisce Éireann is noted.

5.3.2 Item No.2

Item No. 2 States:

“Please note, it is recommended that a SODA be applied for by the applicant and submitted as part of the formal planning application submission”.

Response

In response to the above please refer to the accompanying Infrastructure Report and Flood Risk Assessment prepared by Barret Mahony Civil and Structural Consulting Engineers. Accordingly, Appendix IV includes the Statement of Design Acceptance from Uisce Éireann.

5.3.3 Item No.3

Item No. 3 States:

“If the proposed development is required to submit an Environmental Impact Assessment Report, then the applicant is required to submit an EIAR Scoping document to UE in order for us to have an opportunity to provide our feedback on areas pertaining to UE infrastructure etc. All EIAR Scoping requests can be forwarded to planning@water.ie”.

Response

A scoping request is not required as a part of the proposed development. An *Environmental Impact Assessment Screening Statement* has been prepared by Tom Phillips + Associates and this is enclosed accordingly. We note that the proposed development is sub threshold in this regard.

5.4 Letter from Cork City Childcare

We have reviewed the Letter from Cork City Childcare included in Appendix D of Cork City Council's LRD Opinion. The main points raised within the letter are addressed and identified below.

- Cork City Care have carried out a childcare needs assessment for the Farrandahadore More, Sarsfield Road, Wilton, Cork City. The assessment reflects the surrounding area encompassing a c. 3km survey radius;
- The letter states that when the requirements of the Childcare Facilities Guidelines for Planning Authorities, 2001, is applied to the proposed development (350 no. dwellings) this would result in a need for 94 no. childcare spaces at a minimum;
- The letter goes on to state that the surrounding area shows a greater need for childcare spaces as the existing facilities are currently at full capacity. The letter references the CSO statistics, stating that current trends would indicate the following - *‘Based on the country average of 1.32 children per family, applying this to the 350 proposed family homes results in an estimate 462 children. Given that 34% of these children (the country average for those requiring childcare) would need childcare within a 15-year cycle, this equates to approximately 157.08 children’.*

Response

In response to the above please refer to the Childcare Demand Assessment prepared by Tom Phillips + Associates. As noted above, the design team engaged with Cork City Childcare in advance of lodgement of the planning application and increased the creche size and amended the design following receipt of feedback accordingly.

The Report outlines the following;

“As part of the subject application, it is proposed to create a 156 sqm childcare facility, which will cater for the childcare needs of the residents of the development. The proposed childcare facility will be located within the heart of this Large-Scale Residential Development, at the Ground Floor Level of the central apartment block;

This facility will provide 52 no. childcare spaces. Section 7.2 below sets out how this proposed childcare provision is appropriate in the context of the proposed LRD and wider childcare infrastructure. The provision of a childcare facility within this residential development is considered an appropriate location for childcare provision, in line with Sections 11.64, 11.162, 11.163, and 11.168 of the Development Plan;

Full details regarding the proposed design of the proposed childcare facility is provided within the Architectural Drawing Pack which is enclosed as part of this planning application; The existing childcare provision in the surrounding area is set out in Section 7.0, alongside a rationale as to how the proposed resulting childcare demand from the proposed development will be catered for, both by the proposed childcare facility and existing childcare network”.

We note that as part of our assessment, in line with the extract above from the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2022)*, does not include one-bedroom units are part of the calculation of the likely childcare demand resulting from the proposed development. The subject Application includes the provision of a 156 sqm childcare facility, which will provide 52 no. childcare places. This meets the minimum requirement based on the number of 2+ bedroom units proposed as part of the subject Application. The accompanying report outlines the proposed development’s compliance with the current legislative guidance regarding residential development’s childcare provision. In addition, the proposed number of childcare spaces is based on the forecasted future need of the proposed development. Therefore, we submit to the Local Authority that the provision of 52 no. childcare spaces is appropriate in this instance.

5.5 Letter from Inland Fisheries Ireland (IFI)

The Letter from Inland Fisheries Ireland (IFI) states the following;

“It appears it may be proposed to dispose of septic effluent from the development to the public sewer. IFI would ask that Irish Water signifies there is sufficient capacity in existence so that it does not overload either hydraulically or organically existing treatment facilities or result in polluting matter entering waters. Should this not be the case then please forward proposals for alternative treatment and disposal options.

IFI would ask that there be no interference with, bridging, draining, or culverting of the adjacent river or any watercourse its banks or bankside vegetation to facilitate this development, without the prior approval of IFI and that full cognisance is given to IFI “Guidelines on protection of fisheries during construction works in and adjacent to waters”.

Response

In response to the above please refer to the accompanying Infrastructure Report and Flood Risk Assessment prepared by Barret Mahony Civil and Structural Consulting Engineers. Accordingly, Appendix IV includes Confirmation of Feasibility from Irish Water. Installation of hydrocarbon interceptors, bioretention and tree pits are also proposed to treat pollutants before water reaches the drainage network. The proposed development does not directly adjoin or contain a water body, and no culverting or bridging is proposed on site accordingly.

5.6 Letter from National Transport Authority (NTA)

The Letter from Inland Fisheries Ireland (IFI) states the following;

“Taking the above matters into consideration, on the basis of the routes proposed as part of the BusConnects Network Redesign, the location of the subject site would benefit from a high level of bus network connectivity and a high combined service frequency to a range of key destinations across the Cork City area. In this regard, facility of access between the subject site and bus stop locations should be taken into consideration, including access to stops serving south bound services on Sarsfield Road;

The provision for permeability through the site is supported in principle, in facilitating improved connectivity within the wider area and accessibility to public transport service;

Provision for Cycling on Access Road – The proposed cycling facilities as presented, on the existing access road to the south of the proposed development are not considered to be consistent with the standards outlined in the NTA’s Cycle Design Manual

Sarsfield Road/Access Road Junction – Although this is outside the red line boundary it is recommended that the existing junction design is reviewed”.

Response

In response to the above please refer to the accompanying documentation prepared by Reddy Architecture + Urbanism. In addition, please refer to the Traffic and Transportation Assessment and Mobility Management Plan prepared by ILTP Consulting Engineers.

We would like to highlight that that Cork City Council are developing an Active Travel Scheme from Sarsfield Road to Munster Technological Institute (MTU). The scheme is currently at design stage, and it is anticipated that the scheme will go forward to construction in later 2025 and be completed in 2026. The scheme is approximately c. 4km in length and runs from the proposed development’s access on Sarsfield Road to MTU. The scheme aims to deliver high-quality pedestrian and cycle routes and also to upgrade the major junctions along the route to bring them in line with DMURS and the NTA’s Cycle Design Manual. The proposed development’s permeability and interaction with Sarsfield Road are promoted with the provision of pedestrian and bicycle access points. Accordingly, the proposed development’s road access has been ensured to be safe for all users’, ensuring priority is given to bike users with one-way bicycle lanes on either side of the road. We have also had regard to the identification of the Cork Luas stop at CUH (April 2025) by NTA and TII.

The proposed cycle facilities on the existing ESB access road to the south have been revised to accord with the NTA’s Cycle Design Manual requirement. As part of the pre-planning discussions, it was agreed that the access arrangement to the proposed development off Sarsfield Road would be designed to fully integrate with the proposed Cork City Councils’ Active Travel Scheme. This will ensure that the access arrangement proposed will be fully integrated with the existing and planned pedestrian, cycle and public transport facilities on Sarsfield Road. In addition, the site’s accessibility by public transport is discussed in the Planning Report and Statement of Consistency, prepared by Tom Phillips + Associates.

6.0 CONCLUSION

In conclusion, it is respectfully submitted that all the issues raised by Cork City Council in the LRD Opinion have been comprehensively addressed as outlined above as part of the subject LRD planning application.

The accompanying *Planning Report / Statement of Consistency* includes a full rationale for the proposed development, primarily based on the oversupply of offices and the acute undersupply of housing.

The design strategy has been shaped by several additional factors, and various adjustments have been made in direct response to the feedback received from the Planning Authority during the pre-application consultation stages.

The proposed development will provide an appropriate form of high-quality apartment and housing accommodation at this site, which integrates effectively with the wider area. It is consistent with national, regional, and local planning policies at all levels and represents an efficient use of a serviced infill site. Located near existing employment nodes and well served by public transport, the development will meet contemporary urban living standards.

It is submitted that the proposed development therefore is in accordance with the proper planning and sustainable development of this area and that the issues raised in the Planning Authority's LRD Opinion have been fully addressed by this Response and the accompanying planning application documents.

We trust you will find this Application in order and look forward to your decision.

Yours sincerely,



Órla Casey
Associate
Tom Phillips + Associates



Appendix A – Copy of LRD Opinion



Comhairle Cathrach Chorcaí Cork City Council

Halla na Cathrach, Corcaigh - City Hall, Cork - T12 T997

Órla Casey,
Tom Phillips + Associates
No. 1 Horgan's Quay,
Waterfront Sq.
Cork City
T23 PPT8

25/10/2024

**Large-Scale Residential Development (LRD) Opinion
Planning and Development Act 2000 (as amended)
Planning and Development Regulations 2001 (as amended)**

RE: LRD 05-24

**Site on lands adjoining the ESB Networks DAC Office, at Farrandahadore More,
Sarsfield Road, Wilton, Cork City**

A Chara,

With reference to your application LRD 04-24 Opinion Stage at Site on lands adjoining the ESB Networks DAC Office, at Farrandahadore More, Sarsfield Road, Wilton, Cork City, I enclose the following for your attention:

- Notice of Opinion
- LRD Opinion Report
- Appendices
 - A. Section 247 Consultation minutes
 - B. Section 32C LRD Meeting minutes
 - C. Internal Consultee Reports
 - D. External Consultee Reports

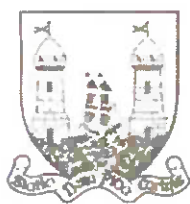
I trust that this is in order.

Yours sincerely,

Majella McMorrow
Senior Staff Officer
Planning - Development Management



We are Cork.



Comhairle Cathrach Chorcaí **Cork City Council**

Halla na Cathrach, Corcaigh - City Hall, Cork - T12 T997

Notice of Large-Scale Residential Development (LRD) Opinion **Planning and Development Act 2000 (as amended)** **Planning and Development Regulations 2001 (as amended)** **Planning And Development (Large-Scale Residential Development) Regulations 2021**

Reference Number: LRD 05-24

Proposed Development: The Land Development Agency (LDA) intends to apply to Cork City Council for permission for a Large Residential Development with a total application site area of c. 2.7 ha, on lands adjoining the ESB Networks DAC Office, at Farrandahadore More, Sarsfield Road, Wilton, Cork City. The development will provide 350 no. residential units and a 138 sqm childcare facility. The development will consist of 16 no. 2- storey, 3 no. bedroom townhouses and 334 no. apartment units (154 no. 1 bedroom apartments, 180 no. 2 bedroom apartments) arranged in 3 no. Apartment blocks (the easternmost block is proposed to be 7 no. storeys in height, the middle block ranges in height from 5-7 no. storeys including parking at ground level under podium level, and the westernmost block is 5 no. storeys including parking at ground level under podium level); public communal and private open space. The proposed vehicular, cycle and pedestrian access into the development is via a reconfigured shared access with the ESB facility to the southeast, via a controlled junction on Sarsfield Road; the existing vehicular entrance to the site from Sarsfield Road on the eastern site boundary will change to cycle and pedestrian only access. In addition, the proposed development includes bin stores; 182 no. car parking spaces; 175 no. bicycle parking spaces; internal roads and pathways; hard and soft landscaping including an outdoor play area; plant; boundary treatments including retaining walls along the northern boundary, the repair and replacement of some existing boundary treatments; the provision of new drainage and watermain infrastructure and any required pipe diversion works; SuDS measures including green roof provision; below-ground attenuation structures; changes in level; services provision and related ducting and cabling; electric vehicle charging points; 3 no. ESB substations; generator compound; photovoltaic panels; signage; public lighting and all site development and excavation works above and below ground.

Location: Site on lands adjoining the ESB Networks DAC Office, at Farrandahadore More, Sarsfield Road, Wilton, Cork City.

It is recommended that the Planning Authority serve a notice on the prospective applicant, pursuant to section 32D(1), of the Planning and Development Act 2000 (as amended), stating that it is of the opinion that the documentation, submitted with the consultation request under section 32B of the Planning and Development Act 2000 (as amended), requires **further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD.**

Pursuant to section 32D(2) the following areas and issues require further consideration. It should be noted that the further consideration of these issues may require amendment to the documents and or design proposals submitted at the application stage.

1. (a) Further consideration of and possible amendment of the development in terms of the height of the development and its potential visual impact. In this regard you are requested to note that under Paragraphs 11.45 and 11.46 of the Cork City Development Plan 2022-2028 a Tall Building is defined as buildings above 18m/6 residential storeys. Paragraph 11.51 and 11.52 of the Plan should also be noted in this regard as well as the site's location outside of the 'City Fringe, Primary Corridors and Major Urban Centre' as defined in the Density and Heights Map 08 in Volume 2 of the Plan. It should also be noted that planning applications for Tall Buildings guided by detailed guidance within the Plan (see Paragraphs 11.59 in particular and 11.53 – 11.60).

(b) Further consideration of the visual impact of the scheme including an assessment of whether the development would break the skyline when viewed from Sarsfield Road north and south and the potential impact on linear views of Landmark Buildings such as County Hall and Our Lady's Hospital (See also Item 4(a) below in this regard). Prior to the carrying out of a detailed visual impact assessment it is recommended that a balloon test be carried out on site in order for the Planning Authority to determine suitable viewing assessment points having regard to the variation in ground levels in the surrounding area.

As advised at pre-planning stage there may be scope to increase height to the west of the site to support an appropriate density level on this site – there may be scope to introduce duplex units and/or apartment units in this location. In addition it may be prudent to reduce the floor-to-ceiling heights in certain locations. Further consideration of the lowering of ground levels in this location is also recommended.

See also Item 4(a) below and note that the Planning Authority would welcome the opportunity to discuss any revised proposals prior to the formal submission of the planning application.

2. Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the City Architect's Section.

3. Further consideration of the scheme and amendment of proposals/revised drawings/details to provide for active permeability through the site on cycle/foot through to Cardinal Court – Note the dwellings backing onto Cardinal Court should be redesigned to take into account then need for passive surveillance along this route (Objectives 2.10, 2.14 and 4.5 of the Plan).

4. Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the Objective 3.6 Housing Mix and the min/max and targets for dwelling size mix as outlined within the Table 11.8 of the Cork City Development Plan 2022-2028 noting the under provision of 3 and 4 bed units and overprovision of 1 and 2 bed units within the proposal.

5. Further consideration of the scheme and amendment of proposals to take into account the report of the Biodiversity Officer.

6. Further consideration and proposals to take into account Uisce Eireann submission and the report of the Drainage Section in relation to wastewater.

7. Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the E.E. Environment Section.

8. Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the Senior Executive Transport Officer.
9. Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the report of the S.E.E. Urban Roads and Streets Design Section.
10. Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the report of the E.E. Traffic & Regulation Section.
11. Further consideration of revised proposals/drawings/details to address the comments of the Public Lighting Section. Please note that these comments should be considered in conjunction with comments of the Biodiversity Officer in relation to protection of bat species and may require modification to take account of same.
12. Further consideration of revised proposals/drawings/details to address the comments of the A/Senior Parks & Landscape Officer including further consideration of the design of communal amenity space areas including the design of small play spaces and play areas as outlined in Paragraph 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) and Objective 3.32 of the Plan 'Inclusive Design' – in relation to the podium levels.
13. Further consideration of the scheme and amendment of proposals to take into account the submission received from Cork City Childcare which recommends provision of a creche with a capacity of 157 children. In addition further consideration and an amendment of phasing strategy is required in order to ensure delivery of the creche in Phase 1.
14. Further consideration of the scheme and amendment of proposals to take into account the submission received from the I.A.A.
15. Further consideration of the scheme and amendment of proposals to take into account the submissions received from T.I.I. and N.T.A.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

Furthermore, pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 20A, 22 and 23 the following specific information should be submitted with any application for permission. These are in addition to the information submitted at Opinion stage which should be updated accordingly having regard to any changes which are proposed as a result of the above.

- 1(a). All additional studies/updated reports as recommended by the various Section reports (see attached).
- 2(a). A revised Schedule of Accommodation updated to reflect any design changes and correcting any discrepancies (e.g. it is noted for example that two Schedules Rev C and Rev D – both of which refer to a 2-6 storey development. In addition it should be noted that Variation No 1 of the Plan and the location of the site within parking zone 3 in the Cork City Car Parking Zones map in Volume 2 of the Plan should be referenced in relation to parking standards.

3(a). Updated Schedule documents to demonstrate compliance with the relevant national minimum standards for housing and apartments.

4(a). A fully comprehensive Landscape and Visual Impact Assessment arising from further assessment and selection of further assessment viewing points as outlined to Item 1 above. At a minimum it is recommended that the following additional viewing points be assessed and photomontages of the proposed development submitted from these locations:

- Sarsfield Road heading south from the Wilton roundabout at a number of locations;
- Sarsfield Road heading north at additional locations;
- Sarsfield Road heading north at the junction with the westbound slip before the roundabout;
- Sarsfield Road north of the roundabout where views are currently available of County Hall and Our Lady's Hospital (close to junction with Eagle Valley);
- From within the Doughcloyne Industrial Estate where views of the site are available;
- From the N40 on the descent from the flyover of the Bandon Road Roundabout heading east;
- Other locations along the N40 where the ESB mast is visible in both directions east and west;
- From within the Tesco car park and staff car park;
- From Bishopstown Road where views of St . Joseph's Church are available.

5(a). Revised and updated photomontages to take account of any alterations to the proposed design.

6(a). A revised and updated Landscape Masterplan taking into account design changes made on foot of the above including comments of Parks and Recreation Section viz-a-viz play spaces and SuDs details.

7(a). A Statement of Design Acceptance (S.O.D.A.) from Uisce Eireann.

8(a). A statement on how the development has incorporated placemaking and how the proposal would respect, reflect or contribute to the character and vibrancy of the particular neighbourhood, centre or area, commensurate with the nature and scale of the development, and how the development would deliver or contribute towards a quality urban environment and public realm with a focus on accessibility, pedestrian priority and permeability.

9(a). A statement on how the development has considered climate resilience from design to implementation stages.

10(a). A Scheme Sustainability Statement (Objective 5.16 and Chapter 11 of the Plan) demonstrating how the proposal positively responds to the impact of climate change through mitigation and adaption measures. It should be noted that as per Paragraph 11.273 of the Plan *'As part of the Scheme Sustainability Statement, applicants will be required to demonstrate how these considerations were explored and taken forward through the evolution of the development proposal and where they have not been taken forward, reasons are given as to why the measures were not technically feasible or viable. The level of information and commitments within the Statement should be proportionate to the scale and complexity of the development proposal.'*

11(a). The Submission of an updated Daylight and Shadow Study to take full account of all proposed development and proposed amenity spaces and all existing surrounding residential properties (Cardinal Court) and their amenity spaces following amendments to the Scheme as outlined above. The Daylight and Shadow Study should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity/garden/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 such as 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' and the new guidelines published in 2022. 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. *Note - it is very important that all measures of daylight (Vertical Sky Component, Average Daylight Factor and No Skyline) and sunlight (annual probable sunlight hours) are assessed in order to avoid presenting a partial, or biased, analysis of performance.*

12(a). An updated Childcare Demand Assessment Report taking into account the submission from Cork City Childcare.

13(a). An Updated Schools Demand Assessment clarifying level of pupils on waiting lists for enrolment years noting oversubscription in nearby primary and secondary schools.

PLEASE NOTE:

Under sections 32E and 247(3) of the Planning and Development Act 2000 (as amended), neither the carrying out of pre-application consultations nor the taking place of an LRD meeting and the provision of an LRD opinion (where applicable) shall prejudice the performance of the planning authority of its functions under this Act or any Regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

CORK CITY COUNCIL

Section 32D of Planning and Development Act 2000 (as amended)

**Written Opinion on a proposed Large-scale Residential Development
at Lands adjoining the ESB Networks DAC office at
Farrandahadore More, Sarsfield Road, Wilton, Cork.**

The development will consist of:	The development of 350 residential units consisting of a range of townhouses and apartments and a crèche facility, 182 car parking spaces and 175 bicycle spaces.
Location:	Lands adjoining the ESB Networks DAC office at Farrandahadore More, Sarsfield Road, Wilton, Cork.
Applicant:	Land Development Agency (LDA)
Date of S.247 meeting:	13.05.2024
Receipt of valid request for LRD Meeting:	09.09.2024
Date of LRD Meeting:	27.09.2024
Cork City Council LRD Reference:	LRD 05-24

1. Introduction

Further to the Large-scale Residential Development (LRD) meeting that has taken place in relation to the proposed development, the purpose of this report is to form a recommended LRD opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an LRD planning application.

Such reports may also specify (a) the areas, or the issues, in respect of which the documents submitted do not constitute a reasonable basis on which to make the application, and (b) any issues that, if addressed by the relevant documents, could result in the documents constituting a reasonable basis on which to make the application.

2. Site Location and Description

The subject site is located on Sarsfield Road directly north of the existing E.S.B. Network's site and south of the Wilton Shopping Centre and the S.M.A. site (Society of African Missions). It is bounded to the east by Sarsfield Road – a busy dual carriageway which runs at its northernmost section between the Sarsfield Road roundabout/South Ring Road (N40) and Wilton Road roundabout. The site is bounded to the west by the rear of houses in the Cardinal Court housing estate. It is currently undeveloped and consists of a grassed area and a large number of trees. Vehicular access to the E.S.B. site is available via a traffic controlled junction on the Sarsfield Road.

3. Proposed Large-Scale Residential Development

The development as currently proposed would consist of 350 residential units including: 16 No. two storey three bed townhouses and 334 No. apartments provided in three apartment blocks. A creche facility (138 sq.m.) is also proposed along with 182 car parking spaces and 175 bicycle spaces.

The heights of the apartment blocks varies across the site – with the eastern block (adjoining Sarsfield Road) proposed at 7 storeys, the central block varying from 7 storeys to 5 storeys and the western block proposed at 5 storeys. The 16 No. two storey town houses are proposed in two terraces to the west of these apartment blocks with one of the terraces backing onto Cardinal Court and the other onto lands adjoining the shopping centre staff car park.

Some of the key development parameters of the proposed development are summarised below:

Site area (ha)	2.7 hectares
Stated Net Developable Site Area (ha) excluding public open space	2.34 hectares
Total Dwelling Units	350
Dwellings	16
Apartments	334
Density (Net calculation)	130 d.p.h. per hectare (excluding undevelopable area)
Public Open Space	3545 sq.m. (13.1%)
Crèche	138 sq.m.
Part V provision	35 units

4. Relevant Planning History

4.1 On subject site

08/32755: Temporary permission granted for a period of 27 months for the construction a 390-space car park, provision of a bus shelter permission, security barriers, lighting, changes in level, and associated all ancillary works. The Planner's report recommended a detailed Further Information request however this did not issue as the Director of Services decided to grant permission. The proposed development was stated to be required as part of the hospital decant associated with the proposed co-located private hospital at C.U.H., Bishopstown Road. The car park was never constructed, and the permission has expired.

4.2 On E.S.B. regional headquarters site to south

05/29480: Permission granted for the demolition of the existing security hut and associated security gates and pillars at the entrances to the offices on Sarsfield Road and the construction of a new security hut and gates approximately 20 metres to the west of its present location. The development also included the erection of traffic signals at the existing entrance on Sarsfield Road, the installation of a new security fence at the entrance and all associated site works.

05/29614: Permission granted for replacement roof structure.

04/28203: Permission for alterations to include for subdivision and change of use from storage workshop to offices and window replacement.

4.3 On Wilton Shopping Centre site to north:

4.3.1 North of staff car park to north of site and south of S.M.A. lands

Permission refused for a temporary period of five years for (I) The construction of a sheltered canopy (c.77 sq.m) for the purpose of providing a drive thru "Click and Collect" facility with 3 no. parking bays with new vehicular accesses to the internal service road; (II) Signage; (III) Footpaths; (IV) A proposed raised pedestrian crossing and all associated site development works.

As outlined in the planner's report on file the existing staff car park area (north of proposed development site) appears to be unauthorised.

4.3.2 Main Shopping Centre

Numerous small-scale applications have been received on this site – the two main relevant ones being as follows:

18/37794: Permission granted for a mixed-use development including partial demolition of the shopping centre and the construction of an extension to same ranging in height from 2 – 7 storeys to include the following uses: retail and retail services, café rest, a 14-screen cinema, offices a 190-bed hotel and a multi storey car park. A 10-year permission was granted on appeal by An Bord Pleanála from the date of the Order (which was signed on 17.05.2019). This application has not yet been implemented.

09/34191: Permission granted (10 year) for the mixed-use development of Wilton Shopping Centre. The development will consist of the demolition of Unit Nos 1 – 44, including the Penney's Store, of the existing Wilton Shopping Centre building. The proposal is for a mixed use development of 4 no blocks, Blocks A-D, ranging in height from 4 to 7 no. storeys (maximum overall building height of 33.7 metres), over double basement, arranged around a network of pedestrian streets and a new

open space, Wilton Town Square, which is proposed to the north of the SMA Community Centre and Bishopstown Library and east of Cardinal Way. The proposal consists of a total proposed Gross Floor Area (GFA) of 78,475sq.m. comprising of retail and retail services (including café/restaurant uses); a 13 no screen cinema; a 141 no bedroom hotel with a GFA of 7,614sq.m.; a multi-function conference centre with a GFA of 8,176sq.m., including ancillary areas and an exhibition space/viewing gallery; 9 no student accommodation units, providing 47 no bed spaces with a GFA of 1,951sq.m.; medical services with a GFA of 5,970sq.m.; and offices with a GFA of 10,092sq.m. This permission was not enacted.

4.4 S.M.A. lands

24/43272: Current application for the following 1) converting a window opening into a new entrance door to the eastern elevation of the existing building, 2) opening up 3 No. new internal doors, 3) removal of 3 no. existing ensuites and partitions of recently constructed walls, 4) minor elevation alterations, 5) all associated site works including new external wheelchair access ramp and railings at S.M.A. House a Protected Structure.

00/24777: Permission granted to install 15 No. 5m high light fittings and to construct a 2.4m high wall.

4.5 Cardinal Court

12/35343: Permission granted for the construction of a single storey extension to side and rear of existing house (52 Cardinal Court -site to south of green area to west of development site).

5. Planning Policy

5.1 National and Regional Planning Policy

5.1.1 National Planning Framework 2018-2040

National Strategic Outcome 1, Compact Growth, recognises the need to deliver a greater proportion of residential development within existing built-up areas. Activating these strategic areas and achieving effective density and consolidation, rather than sprawl of urban development, is a top priority.

Objectives 3A and 3B direct new housing development to existing built up areas.

A consultation phases has been recently held on the Draft Revision of the National Planning Framework. The following are Draft National Policy Objectives of relevance:

National Policy Objective 4 A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 7 Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth

National Policy Objective 8 Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

National Policy Objective 10 Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.

National Policy Objective 11 Planned growth at a settlement level shall be determined at development planmaking stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

National Policy Objective 12 Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 20 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.

National Policy Objective 21 The Government will support the LDA, in association with Local Authorities, to fulfil its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority.

National Policy Objective 22 In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth

National Policy Objective 38 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.

National Policy Objective 42 Prioritise the alignment of targeted and planned population and employment growth with investment in: • A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities; • The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities; • The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and • Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.

National Policy Objective 44 Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 45 Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 46 Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

5.1.2 Housing for All – A New Housing Plan for Ireland 2021

The stated aim is to provide access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life. The plan identifies the need for

construction of an average of 33,000 homes per annum nationally until 2030 to meet the targets outlined in the National Planning Framework. Four overarching objectives are identified:

- *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.*

The following were identified among the first steps in the Pathway to 'Increasing New Housing Supply':

- *State land bank to provide more land to the LDA to bring forward up to 15,000 homes and State to fund Local Authorities for land acquisition.*
- *In accordance with the National Planning Framework, focus on adequate supply of serviced zoned lands to meet housing need, at required density.*
- *Introduce a new planning process for Large-Scale Residential Developments, to replace the Strategic Housing Development process.*

5.1.3 Cork Metropolitan Area Strategic Plan (M.A.S.P.)

Guiding Principles for the Cork M.A.S.P. area, include:

- A living city and suburbs.
- Compact sustainable growth: Promote consolidation of Cork City and suburbs, refocus on the development of brownfield and infill lands.
- Integrated transport and land use: Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects under the development of C.M.A.T.S. (Cork Metropolitan Area Transport Strategy).
- Accelerate housing delivery: Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based design standards.

Policy Objective 8: Key Transport Objectives (subject to the recommendations of CMATS))

East-West Light Rail Public Transport Corridor: A strategic public transport corridor from Mahon to Ballincollig via the City Centre, serving CIT, CUH, UCC, Kent Station, Docklands, Mahon Point.

5.1.4 Southern Region Regional Spatial Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (R.S.E.S.) for the Southern Region was published in 2020 with the aim of building a strong, resilient, sustainable region. Measures include strengthening and growing cities and metropolitan areas. Key principles in developing the strategy include the need to provide an adequate supply of quality housing to meet existing and future demand, regenerating and developing existing built-up areas as attractive and viable alternatives to greenfield development.

RPO 10: Compact Growth in Metropolitan Areas: To achieve compact growth, the RSES seeks to:

- a. Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.*
- b. Identify strategic initiatives in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP.*

5.2 Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment and the documentation on file, the most directly relevant section 28 Ministerial Guidelines include the below some of which are discussed in more detail thereafter:

- Sustainable Residential Development and Compact Settlements (2024) - Guidelines for Planning Authorities.
- Quality Housing for Sustainable Communities (2007) Best Practice Guidelines (2007).
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (July 2023).
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018).
- Design Manual for Urban Roads and Streets (2019), and the National Cycle Manual.
- Guidelines for Planning Authorities on Architectural Heritage Protection 2004 (re-issued 2011) (DoELG)
- Childcare Facilities Guidelines for Planning Authorities (2001).
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment 2018.
- Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities 2009.

5.2.1 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024

These Guidelines were published in January 2024. Policy and Objective 3.1 of the Guidelines states that: *It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.*

Table 3.1 - Areas and Density Ranges Dublin and Cork City and Suburbs**City - Centre**

The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods⁶, are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork.

City - Urban Neighbourhoods

The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations⁷, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.

City - Suburban/Urban Extension

Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development⁸. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

3.4.1 Step 1: Consideration of Proximity and Accessibility to Services and Public Transport

While densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations. Densities above the ranges are 'open for consideration' at accessible suburban and urban extension locations to the maximum set out in Section 3.3.

Table 3.8 (below) sets out definitions for terms used to define accessibility to allow for consistent application. The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required.

Table 3.8: Accessibility**High Capacity Public Transport Node or Interchange**

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Appendix B sets out detailed guidance regarding the calculation of densities, and specifically on what should and should not be included in the Net Developable Area. It is summarised as follows:

Table 1

Net Site Area Includes	Net Site Area Excludes
<ul style="list-style-type: none"> • Local Streets as defined by Section 3.2.1 DMURS. • Private and semi-private open space. • Car parking, bicycle parking and other storage areas. • Local parks such as neighbourhood and pocket parks or squares and plaza's • All areas of incidental open space and landscaping. 	<ul style="list-style-type: none"> • Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS. • Lands used for commercial development (inc. retail, leisure and entertainment). • Lands for primary schools, churches and other community services and facilities. • Larger, Regional or District Parks, Wayleaves or rights of way. <p>Other areas of land that cannot be developed due to environmental sensitivities, topographical constraints (i.e. steepness) and/or are subject to flooding.</p>

Standards for housing are outlined as follows in the Guidelines:

SPPR 1 - Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans¹⁵ shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained.

Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

SPPR 2 - Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq.m*
- 2 bed house 30 sq.m*
- 3 bed house 40 sq.m*
- 4 bed + house 50 sq.m*

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semiprivate open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes.

Table 5.1 Minimum Private Open Space Standard for Houses

House	Minimum Private Open Space	Max Semi-Private (in lieu)
1 bed	20 sq.m	10 sq.m
2 bed	30 sq.m	15 sq.m
3 bed	40 sq.m	20 sq.m
4 bed+	50 sq.m	25 sq.m

Policy and Objective 5.1 - Public Open Space

It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations. In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area. In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas. In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site.

SPPR 3 - Car Parking

It is a specific planning policy requirement of these Guidelines that:

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.

SPPR 4 - Cycle Parking and Storage

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.*

5.2.2 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023

Planning Authorities and An Bord Pleanála are required to have regard to these guidelines and to apply any specific planning policy requirements of the guidelines in carrying out their functions.

The 'Specific Planning Policy Requirements' outlined in these Guidelines are relevant along with the content of Appendix 1 which summarises the required minimum floor areas as well as private and communal open space standards.

Housing Mix

Specific Planning Policy Requirement 1

Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).¹

¹ See Objective 3.6 of the Plan 'Housing Mix': Cork City Council will seek to: a. Implement the provisions of the Joint Housing Strategy and HNDA as far as they relate to Cork City and Paragraph 11.76 All developments will need to comply with dwelling size mix set out in Tables 11.3 -11.9.

Specific Planning Policy Requirement 2

For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha²:

- Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- For schemes of 50 or more units, SPPR 1 shall apply to the entire development;*

All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.

Minimum Floor Areas

Specific Planning Policy Requirement 3 outlines minimum apartment floor areas as follows:

<i>Studio apartment (1 person)</i>	<i>37 sq.m.</i>
<i>1-bedroom apartment (2 persons)</i>	<i>45 sq.m</i>
<i>2-bedroom apartment (4 persons)</i>	<i>73 sq.m</i>
<i>3-bedroom apartment (5 persons)</i>	<i>90 sq.m.</i>

Paragraphs 3.5 – 3.7 state as follows:

'3.5 The floor area parameters set out in SPPR 3 above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing. In relation to social housing, or purpose built housing for older people it is considered necessary that these guidelines would also make provision for a two-bedroom apartment to accommodate 3 persons. This is in line with the Quality Housing for Sustainable Communities guidance published by the Department in 2007, for application to social housing schemes.

3.6 Accordingly, planning authorities may also consider a two-bedroom apartment to accommodate 3 persons, with a minimum floor area of 63 square metres, in accordance with the standards set out in Quality Housing for Sustainable Communities (and reiterated here in Appendix 1). This type of unit may be particularly suited to certain social housing schemes such as sheltered housing.

3.7 While providing necessary variation in dwelling size, it would not be desirable that, if more generally permissible, this type of two-bedroom unit would displace the current two-bedroom four person apartment. Therefore, no more than 10% of the total number of units in any private residential development may comprise this category of two-bedroom three-person apartment. This is to allow for potential social housing provision further to Part V of the Planning and Development Act 2000 (as amended), or, if this type of unit is not required to meet social and affordable housing requirements, that it would allow for an acceptable level of variation in housing type.'

Minimum aggregate bedroom and living room sizes and individual and aggregate bedroom sizes are also set out in Appendix 1 of the Guidelines.

Storage

² The development site is 2.7 ha in area

Appendix 1 of the Guidance Document outlines storage requirements with a studio units having a requirement of 3 sq.m. of storage space, a one bed unit and a 2 bed (3 person) unit both having a requirement of 5 sq.m., a 2 bed (4 person) unit having a requirement of 6 sq.m. and a three bed + unit 9 sq.m. The Guidelines state as follows:

'3.31 Storage should be additional to kitchen presses and bedroom furniture, but may be partly provided in these rooms. In such cases this must be in addition to minimum aggregate living/dining/kitchen or bedroom floor areas. A store off a hallway or landing will facilitate access, but hot presses or boiler space will not count as general storage. As a rule, no individual storage room within an apartment should exceed 3.5 square metres.

3.32 Apartment schemes should provide storage for bulky items outside individual units (i.e. at ground or basement level). Secure, ground floor storage space allocated to individual apartments and located close to the entrance to the apartment block or building is particularly useful and planning authorities should encourage the provision of such space in addition to minimum apartment storage requirements. This form of storage may be used for equipment such as, for example, bicycles or bicycle equipment, children's outdoor toys or buggies. However, such storage does not satisfy bicycle parking requirements.

3.33 Where secure, allocated ground or basement level storage is provided, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these guidelines. This is intended to enable greater flexibility in apartment design, whereby more living or bedroom space may be provided within the apartment unit in lieu of a portion of required internal storage space where such storage space has been provided elsewhere in the building.

3.34 For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, the storage requirement may be relaxed in part, on a case-by-case basis, subject to overall design quality.'

Private Amenity Space

Private amenity space standards for apartments are set out in Appendix 1 of the Guidelines wherein it is indicated that a studio unit would have a requirement of 4 sq.m. private amenity space, a one bed unit should be allocated 5 sq.m., a two bed (3 person) unit 6 sq.m., a two bed (four person) unit 7 sq.m. and a three bed unit 9 sq.m.

Communal Amenity Space

Paragraph 4.10 of the 2022 Guidelines states that *'The provision and proper future maintenance of well-designed communal amenity space will contribute to meeting the amenity needs of residents. In particular, accessible, secure and usable outdoor space is a high priority for families with young children and for less mobile older people. The minimum required areas for public communal amenity space are set out in Appendix 1. While private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and/or a 'privacy strip' between the two....*

For building refurbishment schemes on sites of any size or urban infill schemes on site of up to 0.25ha communal amenity space may be relaxed in part or whole, on a case by case basis subject to overall design quality.

Communal amenity space standards for apartments are set out in Appendix 1 of the Guidelines wherein it is indicated that a studio unit would have a requirement of 4 sq.m. private amenity space, a one bed unit should be allocated 5 sq.m., a two bed (3 person) unit 6 sq.m., a two bed (four person) unit 7 sq.m. and a three bed unit 9 sq.m.

Children's Play

Paragraph 4.13 states that *'The recreational needs of children must be considered as part of communal amenity space within apartment schemes. Experience in Ireland and elsewhere has shown that children will play everywhere. Therefore, as far as possible, their safety needs to be taken into consideration and protected throughout the entire site, particularly in terms of safe access to larger communal play spaces. Children's play needs around the apartment building should be catered for:*

- *within the private open space associated with individual apartments (see chapter 3);*
- *within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and*
- *within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.*

Dual Aspect Ratios

Specific Planning Policy Requirement 4 states as follows:

'In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.'

Paragraph 3.17 states that *'Ideally, any 3 bedroom apartments should be dual aspect'*. Paragraph 3.18 states that *'where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature. Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings.'*

Floor-to-Ceiling Height

Specific Planning Policy Requirement 5 states as follows:

'Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.'

Paragraph 3.22 states that: *'From a planning and amenity perspective, applicants and their designers may consider the potential for increasing the minimum apartment floor-to-ceiling height to 2.7m where height restrictions would not otherwise necessitate a reduction in the number of floors.'*

Units per Core

Specific Planning Policy Requirement 6 states as follows:

'A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.'

Refuse Storage

Detailed guidance in relation to refuse storage is outlined in Paragraphs 4.8 – 4.9 of the Guidelines. The following extract from Paragraph 4.9 is of relevance:

'Waste storage areas should be adequately ventilated so as to minimise odours and potential nuisance from vermin/flies and taking account the avoidance of nuisance for habitable rooms nearby;

Provision in the layout for sufficient access for waste collectors, proximity of or ease of access to waste storage areas from individual apartments including access by disabled people;

Waste Storage areas should not be on the public street and should not be visible to or accessible by the general public. Appropriate visual screening should be provided, particularly in the vicinity of apartment buildings.'

Car Parking

Paragraphs 4.20 and 4.29 of these Guidelines state that:

'In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard'.

'For all types of location, where it is sought to eliminate or reduce car parking provision, it is necessary to ensure, where possible, the provision of an appropriate number of drop off, service, visitor parking spaces and parking for the mobility impaired. Provision is also to be made for alternative mobility solutions including facilities for car sharing club vehicles and cycle parking and secure storage. It is also

a requirement to demonstrate specific measures that enable car parking provision to be reduced or avoided.'

As well as showing that a site is sufficiently well located in relation to employment, amenities and services, it is important that access to a car sharing club or other non car-based modes of transport are available and/or can be provided to meet the needs of residents, whether as part of the proposed development or otherwise. 'Car free' development is permissible and if developed, must be fully communicated as part of subsequent apartment sales and marketing processes.'

For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, car parking provision may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and location.'

Bicycle Parking

Paragraph 4.17 of the Guidelines 2 states in relation to bicycle spaces that a minimum standard of 1 cycle storage space shall be provided per bedroom with visitor spaces provided at the rate of 1 space per 2 residential units. Paragraph 4.16 states that *'in particular planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities of residents and visitors.'*

5.2.3 Urban Development Building Heights: Guidelines for Planning Authorities, 2018

These Guidelines set out new and updated national planning policy on building heights in relation to urban areas, elaborating on the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

Paragraphs 1.9-1.10 of the Guidelines state that *'these guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels.'*

The rationale above for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas; for example, within the canal ring in Dublin and analogous areas in Cork, Limerick, Galway and Waterford and other major towns as identified and promoted for strategic development in the National Planning Framework and Regional Spatial and Economic Strategies. In such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality.'

Paragraph 1.17 states that *'Securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities.'*

The following extracts in relation to 'Building Height and the Development Plan' are of relevance to the current application:

Paragraphs 2.8 -2.10 note that:

'2.8 Historic environments can be sensitive to large scale and tall buildings. In that context, Planning Authorities must determine if increased height buildings are an appropriate typology or not in particular settings. An Initial assessment of the existing character and setting of a place will assist in a robust framework for decision-making that will facilitate increases in building height and involve an integrated understanding of place. With regards to large-scale and tall buildings in historic urban areas, an examination of the existing character of a place can assist planning authorities, and others to:

*establish the sensitivities of a place and its capacity for development or change and;
define opportunities for new development and inform its design.*

2.9 In order to consider proposals in an integrated and informed way, an urban design statement addressing aspects of impact on the historic built environment should be submitted along with a specific design statement on the individual insertion or proposal from an architectural perspective addressing those items outlined above.

2.10 Notwithstanding the above, the provisions contained within Part (IV) Planning and Development Acts 2000, as amended, regarding architectural heritage and associated character/setting remain in place. Planning Authorities are the primary consent authority in establishing if proposals align with best practice in this area and which design standards are to be used in certain circumstances. Planning Authorities can reference Architectural Heritage Protection – Guidelines for Planning Authorities (DEHLG) and Shaping the Future – Case Studies in Adaptation and Reuse in Historic Urban Environments (DAHG) 2012.

Paragraph 2.13 states that 'A Specific Planning Policy Requirement of these Guidelines SPRR1 is that '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 following extracts in relation to 'Building Height and the Development Management Process' are of relevance to the current application:

Paragraph 3.2 states that 'In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies a number of criteria including the following:

At the scale of the relevant city/town

- The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*
- On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and*

height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

At the scale of district/ neighbourhood/ street

- *The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.*

At the scale of the site/building

- *The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*
- *Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.*
- *Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.*

SPPR 3 states as follows:

'It is a specific planning policy requirement that where;

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.'

5.2.4 Design Manual for Urban Roads and Streets (DMURS), 2013

These guidelines provide guidance to address street design within urban areas including enhancing the value of place whilst calming traffic and improving pedestrian and cyclist comfort.

5.2.5 Guidelines for Planning Authorities on Architectural Heritage Protection 2004 (re-issued 2011) (DoELG)

Paragraphs 1.7.1 -1.7.2 state that *'Planning authorities are empowered to protect the architectural heritage, in the interest of the proper planning and sustainable development within their respective functional areas, and to prevent its deterioration, loss or damage. This will be reflected in the adoption of suitable policies for protecting the architectural heritage in their development plans and giving practical effect to them through their development control decisions, generally by liaison between planning officers and conservation officers.'*

The duties of a local authority apply across all its functions, for example as a planning authority, a building control authority, a fire authority and so on, to act positively to protect the architectural heritage when exercising their functions.'

Chapter 13 is of relevance dealing with Curtilage and Attendant Grounds of Protected Structures. Paragraphs 13.8.2 -13.8.3 state as follows:

'New development both adjacent to, and at a distance from, a protected structure can affect its character and special interest and impact on it in a variety of ways. The proposed development may directly abut the protected structure, as with buildings in a terrace. Alternatively, it may take the form of a new structure within the attendant grounds of the protected structure. A new development could also have an impact even when it is detached from the protected structure and outside the curtilage and attendant grounds but is visible in an important view of or from the protected structure.'

The extent of the potential impact of proposals will depend on the location of the new works, the character and quality of the protected structure, its designed landscape and its setting, and the character and quality of the ACA. Large buildings, sometimes at a considerable distance, can alter views to or from the protected structure or ACA and thus affect their character. Proposals should not have an adverse effect on the special interest of the protected structure or the character of an A.C.A.'

5.3 Local Planning Policy

5.3.1 Cork Metropolitan Area Transport Strategy (CMATS)

The Cork Metropolitan Area Transport Strategy (CMATS) 2040 has been developed by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council. CMATS supports the delivery of the 2040 population growth target for the Cork Metropolitan Area (CMA). It will provide the opportunity to integrate new development at appropriate densities with high-capacity public transport infrastructure in conjunction with more attractive walking and cycling networks and associated public realm improvements.

BusConnects is the National Transport Authority's (NTA) programme to greatly improve bus services in Cork and other cities. It is a key part of the Government's policies to improve public transport and address climate change. The aim of BusConnects Cork is to deliver an enhanced bus system that is better for the city, its people and the environment. BusConnects Cork is designed to provide a better, more reliable and more efficient bus service for everyone in addition to providing safe cycling and enhanced pedestrian facilities along key routes

CMATS proposes the provision of a Light Rail Tram system for the corridor between Ballincollig and Mahon, serving CIT, CUH, UCC, Kent Station, Docklands and Mahon Point. This meets the long-term objective for the CMA for the development of an east-west mass transit, rapid transport corridor. In advance of development of the LRT, and to allow the development consolidation to support its delivery, this route (which runs along Model Farm Road – 'Sustainable Transport Corridor E' (Ballincollig to City within BusConnects proposals) will be served with a high frequency bus service with bus priority measures to enable a high level of performance in advance of its transition to light

rail. During the early period of the Strategy, it is intended to identify and protect an alignment for the light rail scheme, allowing development consolidation along the corridor. BusConnects 'Sustainable Corridor F' is proposed to run between Bishopstown and the City Centre along Bishopstown Road and down Wilton Road via the Wilton Road roundabout – in close proximity to the proposed site.

The National Transport Authority (NTA) conducted the third round of public consultation on the Sustainable Transport Corridors earmarked for development as part of the BusConnects Cork programme in Nov/Dec 2023. The finalised route options will be developed further based on this consultation and a planning application will be made to An Bord Pleanála.

5.3.2 Cork City and County Joint Housing Strategy and Housing Need Demand Assessment

This strategy which was jointly commissioned by Cork City and Cork County Councils provides an evidence base to inform development plan targets for housing and population and to understand the likely mix of households looking to find a home in Cork City and County. The HNDA and Housing Strategy provide the necessary analysis and policy recommendations to ensure that housing demand supply will be met and fed into the preparation of the Cork City Development Plan 2022-2028.

5.3.3 Local Policy context: Bishopstown Area Action Plan

This non statutory Action Area Plan was adopted in 2007 and the main provisions subsumed into subsequent Development Plans.

5.3.4 Cork City Development Plan 2022 – 2028

Volume 2: Mapped Objectives

Chapter A – Zoning Maps

The site is zoned ZO 01 'Sustainable Residential Neighbourhoods' within Map 08 'South Western Suburbs of Volume 2 of the Plan (see extract below):



The objective of ZO 01 as set out in Chapter 12 of Volume 1 is 'to protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.' The Plan goes on to state in relation to this zoning:

ZO 1.1 *The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City's built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable*

residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents.

ZO 1.2 *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.*

ZO 1.3 *Primary uses in this zone include residential uses, crèches, schools, home-based economic activity, open space and places of public worship.*

ZO 1.4 *Uses that contribute to sustainable residential neighbourhoods are also acceptable in principle in this zone provided they do not detract from the primary objective of protecting residential amenity and do not conflict with other objectives of this Development Plan. Such uses include but are not limited to: small-scale local services including local convenience shops; community facilities; cultural service stations (petrol filling stations); local medical services; third level education institutes; community based enterprise or social enterprises, health facilities including hospitals.*

ZO 1.5 *Where it can be suitable, the expansion of zoned Neighbourhood and Local Centres is open for consideration in this zone provided they meet the criteria for such centres set out in Chapter 7 Economy and Employment.*

ZO 1.6 *The employment policies in Chapter Economy and Employment designate particular locations for offices, office-based industry and major retailing development, and these uses are not generally permitted in this zone, unless they are community -based enterprises or social enterprises.*

ZO 1.7 *Many green areas of open space in residential estates in Cork City are included in this zone. There will be a presumption against development on all open space in residential estates including land which has been habitually used as public open space. Such lands shall be protected for recreation, open space and amenity purposes.*

Chapter B - Density and Heights Maps

In terms of density and height designations the site lies within two areas - the 'Outer Suburbs' to the east and the 'Inner Urban Suburbs' to the west (Ref: Map 08 of Chapter B Density and Heights Maps of Volume 2 of the Plan). These maps were developed from the process outlined within the supporting document 'Cork City Urban Density, Building Height and Tall Building Study' prepared by Allies and Morrison in 2021. Planning policy in relation to density and height applicable in such areas is available in Volume 1 of the Plan and is outlined in more detail below in the Sections below relating to Volume 1.

Volume 1: Written Statement

Chapter 2 Core Strategy

The Plan sets out nine Strategic Objectives (SO's) to guide the future development of Cork City. The Core Strategy focuses on the SO of Compact Liveable Growth. The remaining SOs each have an individual chapter setting out specific development objectives and actions. The 9 SOs are summarised below, with the full text of each individual SO included in their relevant chapter within the Plan.

The following are the Strategic Objectives (SOs) for growth to guide the future development of Cork City:

SO 1: Compact Liveable Growth

Deliver compact growth that achieves a sustainable 15-minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to existing city.

SO 2: Delivering Homes and Communities

Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods.

SO 3: Transport and Mobility

Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and smart mobility, accessible for all.

SO 4: Climate and Environment

Transition to a low-carbon, climate-resilient and environmentally sustainable future. Implement climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigate and adaptation.

SO 5: Green & Blue Infrastructure, Open Space and Biodiversity

Manage and enhance green and blue infrastructure, to protect and promote biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character and maritime heritage, and manage access to green and blue spaces that provide recreation, amenity and natural areas.

SO 6: Economy and Employment

Be a national and regional economic driver delivering strong, resilient, diverse and innovative economic growth. Focus new employment in strategic areas across the city. Enhance Cork's role as a city of learning, using knowledge and talent as a key enabler for city and economic growth.

SO 7: Heritage, Arts and Culture

Protect and enhance the unique character and built fabric of the city its neighbourhoods, urban towns and settlements by caring for Protected Structures, archaeological monuments and heritage, Architectural Conservation Areas and intangible heritage. Identify, protect, enhance and grow Cork's unique cultural heritage and expression in an authentic and meaningful way. Ensure Cork's heritage, culture and arts are celebrated and developed to create an attractive, vibrant and inclusive place to live, work, study and visit.

SO 8: Environmental Infrastructure

Ensure efficient and sustainable use of water services, enhance water quality and resource management. Manage waste generation and treatment and support the principles of the circular economy. Improve air quality and promote pro-active management of noise. Enable the sustainable delivery of digital infrastructure, renewable energy and environmental improvements.

SO 9: Placemaking and Managing Development

Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active

lifestyles, where placemaking is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects the character of the city and neighbourhood.

Cork City Growth Strategy

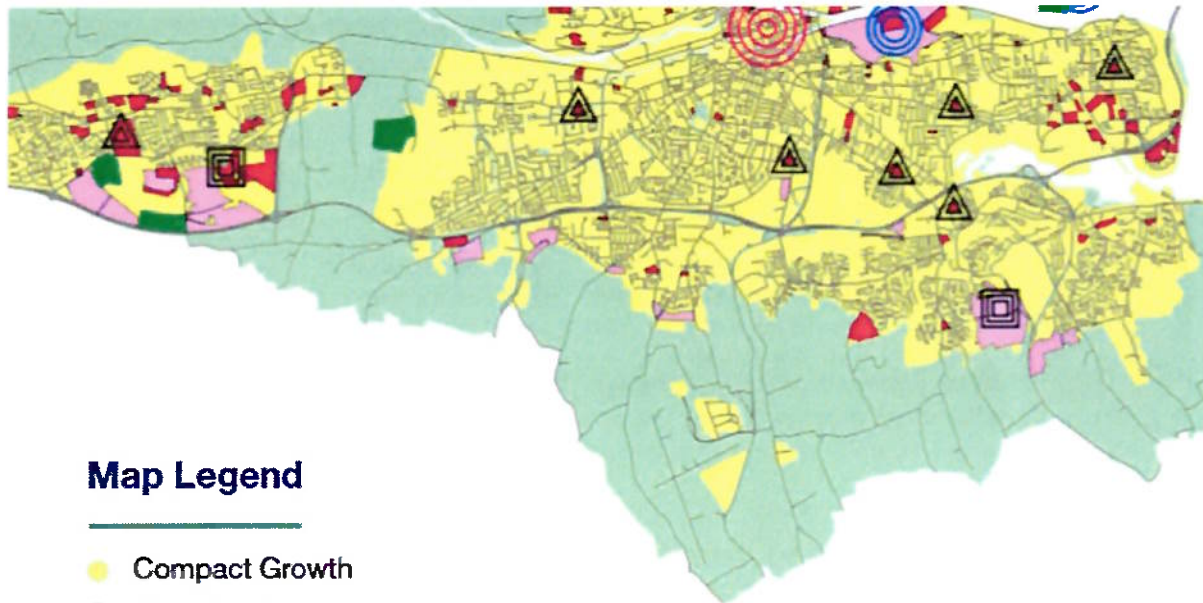
2.50 The Growth Strategy Map and Table set out in Figure 2.21 and Table 2.3, provide site level detail of the growth allocations set out in the Core Strategy. The map and table are in line with the estimated future housing need in the Joint Cork Housing Strategy and the Housing Needs Demand Assessment (HNDA).

The site falls within the 'City Suburbs' in Figure 2.20 'Core Strategy Map'. Figures for indicative future population growth 2028 and targeted population growth 2028 for the South West suburban s outlined in Table 2.2 'Core Strategy Table 2022-2028

2.55 The Growth Strategy Map also indicates planning categories for different areas within Cork City, to reflect their role in delivering the core strategy. These categories are discussed in more detail in Table 2.5, and Chapter 10 of this plan:

- 1. City Centre Consolidation and Regeneration: Regeneration and consolidation of Cork City Centre focusing on the delivery of a broader mix of uses to enhance vibrancy and activity.*
- 2. Strategic Regeneration: Regeneration of Cork Docklands as project of international importance with potential to be exemplars for sustainable urban living.*
- 3. City Expansion Areas: The consolidation and expansion of seven strategic areas as new neighbourhoods, within and adjoining the existing city.*
- 4. Neighbourhood Development Sites: Locally important underutilised sites with capacity for mix used regeneration that deliver walkable neighbourhoods.*

The proposed development site lies within the general 'Compact Growth' designation rather than within any of these specific growth designations indicated in Figure 2.21 Growth Strategy Map – see extract below:



Map Legend

- Compact Growth
- Hinterland

Zoning Tiers

- Tier 1
- Tier 2
- Long Term Strategic Residential

Sub City Area

- City Centre Consolidation and Regeneration
- Strategic Regeneration Project
- City Expansion Area
- ▲ Neighbourhood Development Sites

Paragraph 2.56 states the following in relation to 'Compact Growth: Existing Built-Up Footprint Targets':

'National Planning Objective 3(b) of the NPF requires at least half (50%) of all new homes targeted in each of Ireland's 5 cities to be delivered within their existing built-up footprint. Appendix 4 of the NPF sets out a definition of "existing built-up footprint" based on a CSO definition. When applied to Cork City this definition is too broad, as it covers the majority of lands within the City boundary. To address this, an assessment of the location and nature of all sites in the Core Strategy has been carried out. This determined whether these sites are within the existing built-up footprint or are greenfield in nature. Sites largely surrounded by existing development are considered to be within the city's existing built-up footprint. This includes infill and brownfield sites and sites contiguous to the existing city or urban town. Lands that are largely separate from the existing built-up footprint are considered greenfield in nature. Table 2.5 and Figure 2.20 show how 54% of the Tier 1 and Tier 2 lands set out in the core strategy are located within the existing built-up footprint of the City. This reflects the Core Strategy's objectives and targets to deliver compact growth in line with the NPF.'

City Area	Role in the Core Strategy	Some Key Sites	Key Deliverables
City Suburbs	Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.	Ballyvolane, Mahon Blackpool / Kilbarry, North-West Quarter Regeneration area, Old Whitechurch Road. Regenerate underutilised sites in existing neighbourhoods including Mayfield, Douglas, Grange, Togher and Wilton.	<ol style="list-style-type: none"> 1. Delivery of CMATS 2. Framework plans for Blackpool / Kilbarry, Ballyvolane, and Douglas. 3. Action plans for Neighbourhood Development Sites. 4. New City Parks in the Northeast and Northwest suburbs.

City of Walkable Neighbourhoods & Communities

Paragraph 2.29 states that *'New developments need to reflect and respond to existing context by delivering the right mix of uses at a scale and design that create high quality places. They also need to enhance the neighbourhood by increasing social interactions that improve the quality of life.'*

Figure 2.10: *'Liveable Walkable Neighbourhoods, Communities and Urban Towns'* identifies a number of City Areas and Sub City Areas. As per Figure 2.10 the site lies within the South West Suburbs - Area 38 'Wilton' (see also Figure 2.22: *'Built-Up Footprint and Greenfield Growth Target Locations 2022-2028'*).

The Core Strategy Map and Table

Cork City's Core Strategy Map (Figure 2.20) and Table (Table 2.2) set out a land use strategy for Compact Liveable Growth for the plan period and beyond. The Strategy is based on objectives for city growth detailed further in Table 2.6. In relation to Neighbourhood Development Sites it is stated (P.47) that: *'The Strategy identifies underutilised sites within existing neighbourhoods and towns that are locally important. These sites have significant capacity for neighbourhood regeneration to enhance the delivery of walkable neighbourhoods and the 15 minute city (see ch. 10 for more detail).'*

It is noted that the proposed site has not been identified as a Neighbourhood Development Site in the Development Plan.

Objectives for City Growth

Table 2.6 *'Summary of Key Objectives for City Growth'* identifies the roles key sites and key deliverables the Core Strategy will play in shaping land use planning in Cork City during this Plan period. See extract below:

City Area	Role in the Core Strategy	Some Key Sites	Key Deliverables
City Suburbs	Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.	Ballyvolane, Mahon Blackpool / Kilbarry, North-West Quarter Regeneration area, Old Whitechurch Road. Regenerate underutilised sites in existing neighbourhoods including Mayfield, Douglas, Grange, Togher and Wilton.	<ol style="list-style-type: none"> 1. Delivery of CMATS 2. Framework plans for Blackpool / Kilbarry, Ballyvolane, and Douglas. 3. Action plans for Neighbourhood Development Sites. 4. New City Parks in the Northeast and Northwest suburbs.

Strategic Objective 1 'Compact Liveable Growth' is outlined in full at the end of Chapter 2 as follows:

To increase the population of Cork City in line with national and regional growth targets. To develop Cork City as an international compact, sustainable, healthy city of scale and the regional driver of growth by creating sustainable, liveable, integrated communities and neighbourhoods for all. To plan to deliver at least half (50%) of all new homes in the existing built up footprint of the City. To support the delivery of the Core Strategy by: Applying a tiered approach to land use zoning; and by ensuring that new homes are provided at appropriate densities in brownfield, infill and in greenfield locations within and contiguous to existing City footprint.

Several objectives are set out at the end of Chapter 2 to achieve this Strategic Objective including:

Objective 2.8 'Strategic Objectives'

Prioritise the development of areas in accordance with the 9 Strategic Objectives (SO's) of the Core Strategy, as set out in Table 2.1, including areas which are experiencing and/or are likely to experience large scale development or regeneration within the plan period.

Objective 2.10 'The 15-Minute City'

To support the delivery of a 15-Minute City that supports Compact Liveable Growth by creating vibrant local communities that can access all necessary amenities within a 10-minute walk/cycle and access workplaces and other neighbourhoods with a 15-minute public transport journey. Implementation will include walkable neighbourhoods, towns and communities with mix of uses, house types and tenure that foster a diverse, resilient, socially inclusive and responsive city. This includes support for public and active travel infrastructure projects and services and enhanced neighbourhood permeability. Strategic infrastructure and large-scale developments shall demonstrate how they contribute to a 15-minute city and enhance Cork City's liveability and accessibility.

Objective 2.13 'Design-Led City'

Follow a design-led approach that delivers sustainable, high quality placemaking, urban regeneration and high quality architecture in this context. Development shall contribute positively to the quality of the surrounding built and natural environment, health and wellbeing, and shall be planned and designed with reference to climate change mitigation and adaptation.

Objective 2.14 'Walkable Neighbourhoods'

New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:

- a. Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.*
- b. Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character) with active streets and avoiding the creation of "dead" spaces.*
- c. Ensuring a child friendly and age friendly environment applying Universal Design principles with a mix of household types.*
- d. Designing a safe place that enables access for all.*
- e. Creating a healthy neighbourhood with increased urban greening and direct access to high quality parks and public spaces, schools, shops and local services.*
- f. Being well-connected with easy access to public transport and active travel.*
- g. Providing enhanced permeability for walking and cycling.*

Objective 2.16 'Neighbourhood Mix'

'Promote high quality neighbourhoods by increasing the range of community, recreational, local enterprise, cultural and leisure related facilities.'

Objective 2.17 'Neighbourhood Design'

'The design and siting of development shall create a sense of community and identity, enhance connectivity, incorporate creative approaches to urban design, enhance landscape character and green and blue infrastructure and respect the local context and character of the area.'

Objective 2.22 'Delivery of Relevant State Land'

'Cork City Council, together with the LDA and relevant stakeholders, such as the Land Development Agency (LDA), will support and enable the development and renewal and regeneration of suitable state-owned lands as potential key deliverables to achieve NPF growth targets.'

Objective 2.24: 'Underutilised Sites'

'Cork City Council will seek to address issues of dereliction, vacancy and underutilisation of sites within Cork City by encouraging and facilitating their re-use and regeneration subject to good planning and the infrastructural carrying capacities of the area.'

Objective 2.32: 'Housing Supply'

'Support an increase in the supply, affordability and quality of new housing in the city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built, while also achieving an efficient use of zoned and serviced land.'

Objective 2.28 'Population Growth' states as follows:

In planning for future population growth, Cork City Council will assess important factors such as changing average household size, tenure, type and mix (including student accommodation) and existing occupancy and vacancy rates within an area. These factors will help inform policy making, development management guidance and decisions for new development proposals in the city.

Objective 2.30 'Implementing the Core Strategy'

To implement and support the delivery of the Core Strategy in accordance with the Core Strategy Map and Table, the Growth Strategy Map and Table and the Objectives for City Growth Table set out in this plan.

Objective 2.31 'Compact Growth'

It is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy.

Chapter 3 Delivering Homes & Communities**Strategic Objective 2 Delivering Homes & Sustainable Neighbourhoods**

To increase the population of Cork City in line with the Core Strategy. To deliver sustainable, liveable, safe, healthy and child-friendly communities and neighbourhoods. To ensure that new homes are provided at appropriate densities in brownfield, infill and greenfield locations within and contiguous to existing City footprint identified in the Core Strategy, and aligned with transport, community and social infrastructure. To ensure that new homes are provided with a good mix of accommodation types and sizes to meet the needs and abilities of all members of society.

To achieve a higher quality of life for Cork City's communities, promoting healthy living, wellbeing and active lifestyles. To ensure that placemaking is at the heart of all development to create attractive, accessible, liveable, well-designed, child-friendly, playful, healthy, safe, secure and welcoming, high-quality urban places. To promote the concept of a 15-minute city focused on inclusive, diverse and integrated neighbourhoods served by a range of homes, amenities, services, jobs and active and public transport alternatives.

Proposals for new development will demonstrate how placemaking is at the heart of the development and how the development will contribute to the local neighbourhood.

Residential Density

3.22 Optimising the density of any development and ensuring that the best use of land is made are core responsibilities of the planning system and in achieving a more compact form of urban development in Cork City that promotes resource efficiency.

3.23 Cork City Council has prepared the Cork City Urban Density, Building Height and Tall Building Study as an input into the planning strategy for Cork City. The Study has provided a key input into the residential density assumptions that underlie the Core Strategy and other development objectives of this Plan. Building height and the tall building strategy are outlined in Chapter 11: Placemaking and Managing Development.

3.24 The density strategy is based on the suitability of sites within Cork City to accommodate increased densities. The density strategy is ambitious and establishes density ranges for different kinds of locations based on 8 different 'suitabilities'.

The strategy reflects national planning guidance, a bespoke analysis of Cork City and international best practice in relation to policy and models of development. 'Suitabilities' for urban density include:

- Identification as a major development opportunity;*
- Being within or close to an urban centre;*
- Access to high-quality public transport proposed in CMATS (the proposed Cork LRT system, high-quality bus network and bus network)*
- Access to local services; and*
- Access to parks and green space.*

3.25 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.

3.26 The Density Strategy is structured around four sub-areas (see Figure 3.3, and Volume 2: Mapped Objectives):

- City Centre and Docklands ("City and Central Areas");
- City Centre Fringe /Key transport corridors/key urban centres
- Inner Urban Suburbs
- Outer Suburbs.

As shown in Figure 3.3 and the extract below from Map 8 'Density and Heights' of Volume 2 of the Plan the proposed development site lies across the following two of these areas – the majority lying within the 'Inner Urban Suburbs' and the remainder within the 'Outer Suburbs'.

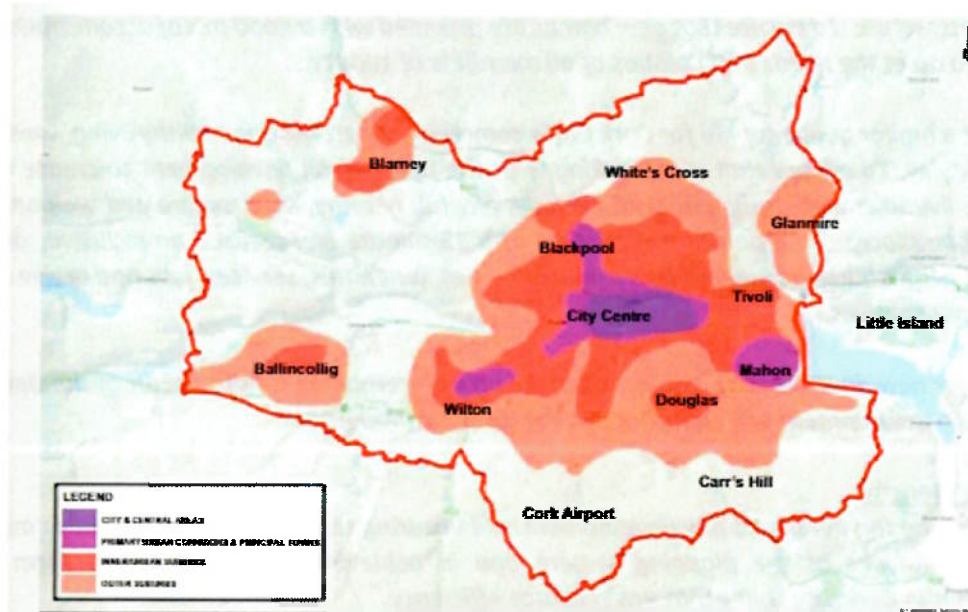


Figure 3.3: Spatial Density and Building Height Strategy.



Delivering a Good Mix of Housing

3.27 The Joint Housing Strategy/Housing Need and Demand Assessment provides and analysis of the need for below-market priced housing for new households. Within Cork City the target is to provide housing for new households at a ratio of 67% market homes to 33% below-market priced homes. In addition to meeting this new housing need the existing housing waiting list will also need to be housed. This Joint Housing Strategy demonstrates that there is an average estimated need for 20.4% of housing output to be social housing units and 12.7% for affordable housing units over the Plan period

to 2028. Table 3.5 outlines estimated delivery of both social housing and affordable units on an annual basis within the 2022-2028 timeframe. There is a need to ensure the provision of affordable private rented housing to address rising student accommodation costs.

3.28 The Part V housing requirement is for an equal split comprising 10% social housing and 10% affordable housing within qualifying housing schemes. Below-market priced housing need will be met by Social and Affordable tenure housing products, which are constantly evolving and it is anticipated that they will continue to evolve through the Plan period. Below-market priced housing products generally include the following:

- Social housing for rent; and
- Affordable housing for rent, purchase or shared ownership.

3.30 All proposed residential developments, or mixed use developments with a residential component, shall have regard to and comply with the provisions of the Housing Strategy and Part V, as appropriate. Applicants will be required to engage with the Planning Authority at an early stage in an application process to ascertain any specific requirements in relation to their Part V obligation. All schemes shall clearly demonstrate how the resultant mix of house type, tenure and housing mix has had due regard to the Housing Strategy and HNDA.

3.33 The HNDA illustrates that housing will be needed to provide for the household sizes set out in Table 3.4 (see below) in Cork City during the period of the Development Plan.

Year	2022	2023	2024	2025	2026	2027	2028	Total	
Household Size								No.	%
1-person	337	674	674	675	675	675	338	4045	25
2-person	402	803	801	800	798	797	398	4799	29.5
3-person	242	482	481	481	480	478	239	2884	18
4-person	221	445	447	450	452	454	228	2697	16.5
5/5+ persons	151	302	301	301	301	301	150	1807	11
Total	1353	2706	2706	2706	2706	2706	1353	16,236	100

Table 3.4: Household Size forecast for additional households in Cork City (Source: Cork City and County Joint Housing Strategy, Section 4: HNDA Components).

Delivering Inclusive Communities

Development proposals

3.59 Development proposals have an important role to play in supporting communities through the provision, expansion or protection of necessary neighbourhood-level facilities. Development itself can place a burden on existing community services and facilities and create additional need for new or expanded infrastructure provision. Development proposals for 100 or more homes should be accompanied by a Community Infrastructure Assessment (CIA) which should identify any under-provision of community facilities in the area. Development proposals will be encouraged to address identified under-provision through on-site delivery of facilities. Consideration may be given to the use of Section 47 Agreements¹ in respect of community infrastructure delivery needed to support new development proposals.

3.87 Chapter 6 Green and Blue Infrastructure, Open Space and Biodiversity addresses Green and Blue Infrastructure while Chapter 11 Placemaking and Managing Development lists development management policies from an open space and recreation perspective. These, together with this section and the associated studies, combine to promote integrated open space and recreation provision throughout Cork City.

Children and Young People

3.63 A key consideration in planning for sustainable, diverse and inclusive neighbourhoods is the need to provide for the needs of children at all stages of their development. The successful delivery of compact growth and creating a more liveable city, will necessitate provision of more childcare, education, passive and active recreation and community infrastructure in-step with growth. Cork City Council is committed to working with stakeholders to provide for the needs of children.

Recreation and Amenity

3.86 The availability of indoor and outdoor recreational facilities at a neighbourhood level is vital to creating a greener, healthier, and more sustainable City overall. It also responds to the challenge of having to plan the future development of the city in a manner that facilitates and encourages every resident, worker or visitor to engage regularly in some form of active recreation, irrespective of their age, economic or social circumstances or their physical capabilities. Much like other forms of community infrastructure, recreational facilities also offer an opportunity for social interaction leading to more inclusive communities while outdoor facilities have the potential to support biodiversity and climate change benefits.

The following specific objectives to support the delivery of SO2 are of relevance to the proposed development:

Objective 3.4 'Compact Growth':

Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork.

Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by:

- a. Cork City Council acting as a development agency to kickstart regeneration of sites and buildings, utilising acquisition as required;
- b. Progress housing and employment delivery in urban centres and strategic regeneration sites;
- c. Active land management utilising the range of tools available (including the Derelict Sites Act 1990 and the Urban Regeneration and Housing Act 2015);
- d. The redevelopment of surplus utility and public sector owned sites;
- e. The development of small and infill sites and the re-use of existing designated and undesignated built heritage assets including those on development sites;
- f. The utilisation of planning and urban design tools to provide a framework for the development of sites (e.g. masterplanning, framework plans, neighbourhood strategies, historic area regeneration strategies, site specific briefs);
- g. Optimising the use of land (see Objective 3.5: Residential Density);
- h. Establishing ambitious and achievable build-out rates at the planning stage to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value;
- i. Influencing Government to update the legislative, guidance, fiscal and financial framework to the benefit of housing delivery on brownfield sites;

- j. Combining its role as planning authority and housing authority to bring about residential development to meet demand and need;*
- k. Where new sustainable transport infrastructure is planned, land use designations will be reviewed and updated where appropriate to provide for housing or mixed use development (including housing);*
- l. Unlocking the development potential of brownfield sites to be used as an evidence base and business case for intervention;*
- m. Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods;*
- n. Identifying and promoting the development potential of brownfield, small sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets;*
- o. Encouraging the retrofitting and reuse of existing buildings, rather than their demolition and reconstruction.*

Objective 3.5 'Residential Density'

Cork City Council will seek to:

- a. Promote compact urban growth by encouraging higher densities throughout Cork City according to the Cork City Density Strategy, Building Height and Tall Building Study and resultant standards set out in Chapter 11: Placemaking and Managing Development and Mapped Objectives; and*
- b. Ensure that urban density is achieved by development proposals providing for high quality sustainable residential development, ensure a balance between the protection of the established character of the surrounding area and existing residential amenities;*
- c. Ensure that urban density is closely linked to creating successful neighbourhoods and ensuring that neighbourhoods are integrated and permeable to ensure short trips are possible to urban centres, local services and amenities;*
- d. Ensuring high-quality architectural, urban and public realm design. Guidance is set out in Chapter 11: Placemaking and Managing Development.*

Objective 3.6 'Housing Mix'

Cork City Council will seek to:

- a. Implement the provisions of the JointHousing Strategy and HNDA as far as they relate to Cork City;*
 - b. Encourage the development of an appropriate mix of dwelling types to meet target residential densities, utilising a range of dwelling types and density typologies informed by best practice (as illustrated in "Density Done Well" in the Cork City Density Strategy, Building Height and Tall Building Strategy) with combinations of houses, stacked units and apartments;*
- Within all new residential developments it will be necessary to ensure an appropriate balance of housing tenure and dwelling size to sustain balanced and inclusive communities, including a balance of family sized units and smaller dwellings tailored to suit the location (please refer to Chapter 11: Placemaking and Managing Development for those standards);*
- d. Deliver at least 20% below-market priced housing across Cork City and ideally within each new residential neighbourhood;*
 - e. Encourage the provision of housing for one and two person households in all neighbourhoods to meet the needs of all age groups, including providing for downsizing to release family housing units;*
 - f. Update Development Plan policy as necessary to reflect emerging national guidance with regard to housing standards.*

Objective 3.21 'Childcare Facilities'

To support the provision and expansion of high quality childcare facilities throughout the city.

The Council will:

- a. Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered;*

- b. Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed;*
- c. Require employers with more than 500 members of staff to provide childcare facilities as part of planning applications for significant new and extended development.*

Objective 3.26 'Cork City as a WHO Healthy City'

To support the designation of Cork as a World Health Organisation (WHO) Healthy City and the implementation of the Cork Healthy Cities Action Plan VII 2020-2030.

Objective 3.29 'Neighbourhood Recreation and Amenity'

- a. To finalise the Cork City Active Recreation Infrastructure Study to guide the implementation of this policy objective and other related objectives in the wider Plan;*
- b. To support and facilitate the development of outdoor and indoor recreational facilities, play facilities and services to cater for all-age groups and people of all abilities on suitable sites;*
- c. To support the clustering of recreational facilities, particularly in locations that are well served by walking, cycling and public transport;*
- d. To promote more multi-functional facilities such as Multiple Games Areas (MUGAs) and multi-use internal courts/halls where there is a deficit in existing facilities across a range of sports/active recreation uses. This does not imply a relaxation of the open space standards for new development proposals;*
- e. To support the provision of formal and informal play areas with appropriate equipment and where possible, incorporating nature-based play equipment and layouts. These, where practical, should seek to appeal to a range of age cohorts through their layout and equipment;*
- f. To discourage the redevelopment of recreational facilities to alternative, non-community uses unless it can be demonstrated there is suitable and accessible (by walking, cycling and public transport) alternative provision elsewhere with sufficient capacity to compensate for the loss of the facility.*

Objective 3.32 'Inclusive Design'

To promote and where applicable implement inclusive design in all new development and in works to existing buildings and facilities including open space and public realm areas to optimise the facilities for all age groups and abilities. This includes embracing the National Disability Authority's Universal Design Guidelines, age friendly principles and international best practice

Chapter 4 – Transport and Mobility

Strategic Objective 3: Transport and Mobility

To support the implementation of the Cork Metropolitan Area Transport Strategy (CMATS).

To support international, national and regional connectivity by supporting the operation and development of Cork Airport and the relocation of the Port of Cork to Cork Harbour.

To integrate land-use and transportation planning to improve movement for all across Cork City. To protect, improve and maintain the operation of national and strategic regional transport networks and assets.

To promote and prioritise sustainable transport including active travel (walking and cycling) and public transport; housing and employment development will be prioritised in locations where it can be served by walking, cycling and public transport. Cork City Council will support the delivery of multimodal travel integration, smart mobility and transport networks and services that are accessible for all. Proposals for new development in Cork City will be required to minimise the need for the private car, prioritise walking, cycling and public transport, be permeable, safe and secure for walking and cycling and where possible provide for filtered permeability. New developments will provide infrastructure for Electric

Vehicles within the developments. Development proposals will provide for easy access to local amenities and education facilities. Proposals for new development will be required to demonstrate their impact on the existing transport networks, commensurate with the nature and scale of the development. Mobility management plans will be required for developments that will accommodate a large number of people living, working or otherwise using the development. All new development proposals will be subject to maximum car parking standards to achieve greater modal shift and promote sustainable transport patterns. In locations where the highest intensity of development occurs, Cork City Council may consider an approach that caps car parking on an areawide basis by means of Area Based Transport Assessments (ABTAs). The delivery of the key transport projects in CMATS will be supported by land use policies and the phasing of development which is compatible with those in CMATS' land use outcome.

Several specific objectives are of relevance in this chapter:

Objective 4.1 'CMATS'

Cork City Council will work in cooperation with the NTA, TII and Cork County Council to fully implement the Cork Metropolitan Area Transport Strategy subject to detailed engineering design and environmental considerations, including the projects and programmes in relation to walking, cycling, public transport, BusConnects, suburban rail, light rail, park and rides and roads infrastructure, including the Northern Distributor Road and Southern Distributor Link Road.

Objective 4.4 'Active Travel'

To actively promote walking and cycling as efficient, healthy, and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient, and safe cycle routes and footpaths across the city.

To support the 15-minute city concept and walkable neighbourhoods with adequate walking and cycling infrastructure connected to high-quality public realm elements, including wayfinding and supporting amenities (benches, water fountains, bike stands). To support the expansion of the Cork Bikes scheme.

To accommodate other innovations such as electric bikes, public car hire, and other solutions that will encourage active travel. To support the rollout of the NTA 5 Year Cycle Plan. To support and engage with the Safe Routes to School programme.

Objective 4.5 'Permeability'

'a. All new development, particularly alongside the possible routes identified for public transport improvements, shall include permeability for pedestrians, cyclists, and public transport so as to maximise its accessibility.

b. To maximise permeability, safety, security and connectivity for pedestrians and cyclists by creating direct links to adjacent roads and public transport networks in accordance with the provisions of statutory guidance as prescribed.

c. Prepare a permeability strategy for areas throughout the city.'

Chapter 5 – Climate Change and the Environment

Strategic Objective 4: 'Climate and Environment':

To support transition to a low-carbon, climate-resilient and environmentally sustainable future. To support the circular economy. Cork City Council is committed to the implementation of measures to support the achievement of national policies and targets for climate mitigation, including the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019, National Mitigation Plan, National Adaptation Framework: Planning for a Climate Resilient Ireland. At the time of preparation of this Plan, the Government agreed to advance the Climate Action and Low Carbon Development (Amendment) Bill 2021 to support Ireland's transition to Net Zero and achieve a climate neutral economy by 2050.

Proposals for new development in Cork City will strive to reduce carbon footprints by carbon emission reductions, sustainable energy consumption, sustainable transport, use of renewable energy sources, green construction methods including passive solar design, and flood risk mitigation and adaptation and use of nature-based solutions, through design, layout, implementation and operation.

A statement commensurate with the nature and scale of the development proposal will be required to accompany planning applications demonstrating how climate resilience has been considered and implemented at all stages in the development process.

The following specific objectives are of relevance:

Objective 5.11 'Energy Efficiency Considerations'

New development proposals are expected to maximise energy efficiency through location, siting, orientation, layout, design, stormwater drainage and landscaping. This includes seeking to optimise energy efficiency through thermal insulation, passive ventilation and cooling and passive solar design.

Objective 5.12 'Energy Use Management'

Development proposals are encouraged to incorporate best practice in technologies that help reduce energy use or enables the monitoring and management of energy use

Objective 5.13 'Waste Management – Construction and Operation of Development'

All development proposals should minimise waste and maximise the recycling and re-use opportunities during the construction and operation phases.

Objective 5.14 'Adaptable Design'

To encourage the incorporation of adaptable design into all new all developments to facilitate their adaptation to alternative use, layout or user requirements in the future if required.

Objective 5.16 'Renewable and Low Carbon Energy'

To encourage development proposals to consider use of renewable energy infrastructure from the project inception stage with planning applications for larger development schemes required to demonstrate how renewable energy infrastructure have been considered through Scheme Sustainability Statements (See Scheme Sustainability Statements in Chapter 11 Placemaking and Managing Development).

Objective 5.23 'Rainwater Harvesting'

To encourage all development proposals to include rainwater harvesting measures.

Objective 5.24 'Green and Blue Infrastructure'

- a. To support the strategic role that Green and Blue Infrastructure plays in facilitating a more climate resilient city.*
- b. All development proposals will be expected to fully explore and incorporate Green and Blue Infrastructure as an integral component of the scheme.*
- c. To support communities in the development of local scale Green and Blue Infrastructure projects.*

Objective 5.17 'Heat Pumps'

To support the use of heat pumps in new build residential, commercial and public buildings taking into account amenity, conservation and heritage considerations.

Objective 5.18 'Roof-Top Solar Photovoltaic/Thermal Panels'

To support the incorporation of photovoltaic and/ or solar thermal collector panels for electricity generation/storage and water heating on new residential, commercial and public buildings taking into account amenity, glint and glare, conservation and heritage considerations.

Objective 5.22 'Electric Vehicles'

To encourage and support the use of Electric Vehicles (EV) and Light Electric Vehicles (LEV) and support the provision of charging infrastructure for EVs on-street, within carparks and in new developments.

Objective 5.23 'Rainwater Harvesting'

To encourage all development proposals to include rainwater harvesting measures.

Objective 5.24 'Green and Blue Infrastructure'

- a. To support the strategic role that Green and Blue Infrastructure plays in facilitating a more climate resilient city.*
- b. All development proposals will be expected to fully explore and incorporate Green and Blue Infrastructure as an integral component of the scheme.*
- c. To support communities in the development of local scale Green and Blue Infrastructure projects*

Chapter 6: Green and Blue Infrastructure, Open Space and Biodiversity

Strategic Objective 5: 'Green and Blue Infrastructure, Open Space and Biodiversity' states as follows:

To strengthen the green and blue infrastructure of Cork City.

To protect and promote biodiversity and habitat connectivity and protect natural areas.

To protect and enhance Cork City's unique landscape character and maritime heritage.

To ensure all of Cork City's residents have access to open spaces, recreation and amenity facilities and natural areas.

A strong green and blue infrastructure network is essential to the quality of life of Cork City's residents and contributes towards the creation of places where people want to live and work. It is an objective of Cork City Council to achieve a healthy, green and connected City with high-quality and interconnected open spaces, parks, diverse natural areas and green and blue corridors.

Proposals for new development in Cork City will respect and reflect the topography, landscape and ecology of the City, and will protect and enhance the City's green and blue infrastructure by ensuring that development does not fragment existing networks of green and blue infrastructure. Proposals for new development will demonstrate how green and blue infrastructure, open space, sport and

Paragraph 6.30 notes as follows:

Strategic and local landmark buildings have been identified so that linear views of these buildings can be protected through the management of development. Strategic landmark buildings are those that are widely appreciated due to their visual prominence and the role that they play in helping people to orientate themselves within the City. Local landmark buildings are important within the City's neighbourhoods due to their local visual prominence. While an illustrative list of local landmark buildings is provided, other local landmark buildings will emerge during the Plan period through the development management process, and where these are identified important linear views to these buildings will need to be taken into consideration.

The following specific objectives are of relevance:

Objective 6.5 'Trees & Urban Woodland'

- a. To protect and enhance the City's tree and urban woodlands in public and private ownership. Cork City Council will seek to survey, map and maintain existing important individual and groups of trees, using Tree Preservation Orders as appropriate;*
- b. To encourage the planting of new urban woodlands and trees where appropriate throughout the City and particularly where there are deficiencies in tree coverage as identified in the Cork City Green and Blue Infrastructure Study;*
- c. To support the preparation of a City Tree Strategy which provides a vision for longterm planting, protection and maintenance of trees, hedgerows and woodlands;*
- d. To support retaining existing trees and the planting of new trees as part of new developments subject to care on the species of tree and the siting and management of the trees to avoid conflict with transport safety and residential amenity in particular;*
- e. To promote the planting of pollinator friendly native deciduous trees and mixed forestry to benefit biodiversity.*

Objective 6.11 'Landscape and Development'

To ensure that the management of development throughout Cork City will have regard for the value of the landscape, its character, distinctiveness and sensitivity in order to minimize the visual and environmental impact of development, particularly in designated areas of high landscape value where higher development standards (layout, design, landscaping, materials) are required.

Objective 6.14 'Cork City View Management Framework'

- a. To protect the strategic panoramic, linear, river prospect or scenic route views identified in this Plan and ensure that development proposals do not have an undue detrimental impact on these views;*
- b. Development proposals will be assessed against their impact on the designated view if it falls within the foreground, middle ground or background of that view. New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the designated views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views;*
- c. Development proposals that could affect a designated view should be accompanied by an assessment that explains, evaluates and justifies any visual impact on the view affected. The scoping process for determining whether a development proposal is likely to affect a designated view should be completed in consultation with Cork City Council. The assessment should demonstrate that the proposal is consistent with the relevant objectives of this Plan. The assessment should form part of a design statement or townscape and visual impact assessment submitted with a planning application;*
- d. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view. Most designated views are seen in a 120*

degree field of view. It is not expected that the view outside of this field of vision should be assessed unless specified by Cork City Council;

e. Strategic and local landmark buildings will need to be considered in the scoping of views to identify the potential impacts of development proposals.

Objective 6.18 'Public Open Space'

a. To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes. There will be a presumption against development of land zoned Public Open Space for alternative purposes;

b. There will be presumption against development on all open space in residential estates in the city, including any green area / public amenity area that formed part of an executed planning permission for development and was identified for the purposes of recreation / amenity open space, and also including land which has been habitually used as public open space. Such lands shall be protected for recreation, open space and amenity purposes;

c. The development of open spaces should "aim to enhance and protect natural features and views and be set in safe and secure environments with the emphasis on active open spaces accessible to and enjoyed by all sectors of the community;

d. To follow an approach of qualitative as well as quantitative standards for open spaces providing high quality open spaces with high levels of access to recreation for local communities, including good practices of inclusive design;

e. Specific design outcomes should be framed in relation to the nature of spaces being created or enhanced (e.g. in relation to maintenance, nature exposure and connectivity, strategic landscape and social role).

f. Support measures to green the city, including re-grassing of appropriate hard-surfaced areas in locations throughout the City.

Objective 6.22 'Natural Heritage and Biodiversity'

a. To protect, promote and enhance Cork City's natural heritage and biodiversity;

b. To support the implementation of the National Biodiversity Plan and the All-Ireland Pollinator Plan and successor publications in Cork City;

c. To support and implement the biodiversity actions from the Cork City Heritage and Biodiversity Plan (2021-2026) in partnership with all relevant stakeholders;

d. Cork City Council will seek to establish and use a City biodiversity database, accessible across all council departments for consideration in land management decision-making;

e. Cork City Council will work with communities to enhance existing, and the delivery of new, biodiversity-rich areas throughout the City including individual buildings, streets, public and private spaces by supporting the provision of green roofs and walls, rain gardens, biodiversity-rich parklets, rainwater harvesting, natural banks and naturalised SUDS;

f. Cork City Council will seek, where appropriate, to enhance the linear habitat connectivity, including the interconnection and enhancement of:

- Woodlands, gardens, open spaces, fields and hedgerows.
- Coastal habitats, river catchments, lakes, streams, ponds.
- Aquatic, marginal and bank side habitats.
- Parks, playing fields and recreational areas.
- Upstream of mapped flood zones.
- City transport routes.

Objective 6.23 'Designated Sites and Protected Species'

To protect and enhance designated sites and areas of natural heritage and biodiversity and the habitats, flora and fauna for which it is designated, and to protect, enhance and conserve designated species.

Objective 6.25 'Non-designated Areas of Biodiversity Importance'

Cork City Council will seek to map the City's ecological networks and corridors of local biodiversity value outside of designated areas, and to work with local stakeholders in supporting the effective management of features which are important for wild flora and fauna and habitats.

Objective 6.26 'Alien Invasive Species'

To support the implementation of measures to control and prevent the introduction, establishment or spread of ecologically damaging alien invasive species (e.g. Japanese Knotweed and Himalayan Balsam).

Volume 3 of the Plan 'Built Heritage Objectives'

Table 3 'Local Landmark Buildings' of Part 4 of Volume 3 identifies St. Joseph's Church Wilton as a Local Landmark Building.

Under the current Plan 4 types of such views are identified in the Plan (Paragraph 6.28 of Chapter 6)

1. Panoramas that offer expansive views of the City.
2. Linear views to landmark buildings.
3. River corridor views.
4. Scenic hinterland routes.

These are shown in the maps in Volume 2 of the Plan and are listed in the Tables in Volume 3 of the Plan. View Management Framework Map 05 of Volume 2 of the Cork City Development Plan and Table 3 of Volume 3 are relevant as they identify St. Joseph's Church, Wilton as a Local Landmark Building.

Chapter 8 Heritage Arts & Culture

Strategic Objective 7 'Heritage Arts & Culture' states as follows:

To protect and reinforce the unique character and built fabric of the city, towns, villages, suburbs, neighbourhoods and places that make up the fabric of Cork City, both the character derived from the natural environment and the man-made character created by the built form. This will be achieved by protecting Protected Structures, archaeological monuments, and archaeological heritage and Architectural Conservation Areas, while providing opportunities for new development that respects the rich, historic built heritage of the city.

To identify, protect, enhance and promote Cork's unique cultural heritage and expression in an authentic and meaningful way. To foster and support the arts and culture in Cork City by encouraging new and improved facilities and by ensuring that arts and culture infrastructure are integrated into large-scale developments on key sites.

To support the development of a vibrant cultural and creative sector in the city as a key enabler of innovation, placemaking and community development throughout the city.

To support the role of Cork City as a significant domestic and international tourism destination and support the sustainable use and development of the city's tourism assets.

To ensure that heritage elements of archaeological, architectural and cultural significance are identified, retained and interpreted wherever possible and the knowledge placed in the public domain.

Proposals for new development must have regard to the historic built heritage of the city, particularly Protected Structures, archaeological monuments and archaeological heritage and Architectural Conservation Areas, and any development that has a detrimental impact on these assets will not normally be acceptable.

The following specific objectives are of relevance:

Objective 8.2 'Protection of the Archaeological Resource'

- a. Cork City Council will protect and enhance the archaeological value of the sites (and their settings) listed in the Record of Monuments and Places (RMP) and the Historic Environment Viewer.*
- b. Cork City Council will ensure that development proposals will protect and preserve archaeological sites discovered since the publication of the Record of Monuments and Places (RMP).*
- c. To ensure the preservation of archaeological remains in-situ, in accordance with national policy (and in the interests of sustainability), impacts on the buried archaeological environment should be avoided where possible.*

Objective 8.27 Elements of Built Heritage

Cork City Council will ensure the protection of important elements of the built heritage and their settings as appropriate.

Volume 3 of the Plan 'Built Heritage Objectives'

Part 2 of Volume 3 identifies the following Protected Structures

- Wilton House and outbuildings PS1033 (SMA House).
- St. Joseph's Church Bishopstown PS1022.
- Wilton Park House PS1034.

Chapter 9 Environmental Infrastructure

Strategic Objective 8 Environmental Infrastructure states as follows:

- *To ensure the efficient and sustainable use of water services infrastructure.*
- *To enhance water quality and water resource management.*
- *To sustainably manage waste generation and treatment.*
- *To support circular economy principles.*
- *To improve air quality and levels of pollution in the urban and hinterland areas of Cork City.*
- *To promote the pro-active management of noise.*
- *To support the investment and delivery of environmental infrastructure to serve the compact growth of Cork City, including water and waste water services, digital infrastructure, renewable energy and environmental improvements.*

Proposals for new development in Cork City will not be permitted where they would have an unacceptable detrimental impact on water resources or infrastructure, water quality or air quality, have inadequate waste management mitigation, generate excessive noise or otherwise have an unacceptable detrimental impact on the environmental infrastructure of Cork City

The following specific objectives are of relevance:

Objective 9.2 'Waste Water'

- (a) To require all new proposals for development to provide a separate foul and surface water drainage system and to incorporate Sustainable Urban Drainage Systems in so far as practical.*

b. As part of new proposals for development, evidence of consultation with Irish Water should be submitted as part of a planning application, demonstrating that adequate water services are available to service the development and that existing water services will not be negatively impacted.

Objective 9.4 'SUDS'

a. To require that all planning applications for new development incorporate Sustainable Urban Drainage Systems (SUDS) in so far as possible. Such proposals shall be accompanied by a comprehensive SUDS assessment including run-off quantity, run off quality and impacts on habitat and water quality.

b. To encourage the provision of green roofs and green walls as an integrated part of Sustainable Urban Drainage Systems (SUDS) and which provide benefits for biodiversity, wherever feasible.

c. To investigate the feasibility of preparing Sustainable Urban Drainage Systems (SUDS) guidelines for Cork City during the lifetime of the plan. In the interim The Department of Housing, Local Government and Heritage document: Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design - Best Practice Interim Guidance Document, will provide guidance in this regard.

Objective 9.6 'Storm Water'

To provide adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.

Objective 9.12 'Waste Management'

a. To support the sustainable management of waste in line with the objectives of the Southern Region Waste Management Plan 2015-2021 and the National Waste Management Plan for a Circular Economy (NWMPC) when published, which will replace the existing Regional Waste Management Plans. b. To facilitate the transition to a circular economy facilitating the value recovery and recirculation of resources in order to generate minimal waste. c. Continue to fulfil duties under the Waste Management (certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (S.I. No 524 of 2008), including those in relation to the identification and registration of closed landfills. d. To encourage the recycling of construction and demolition waste and the reuse of aggregate and other materials in future construction projects. Applications for large infrastructure projects shall be accompanied by a Construction and Environmental Management Plan that includes details of how construction and demolition waste generated is to be managed and, where reuse/recycling is not practicable, disposed of, in line with legislative requirements.

Objective 9.18 'Air Quality'

a. To protect and improve air quality in Cork City in accordance with the provisions of EU Directives and national legislation on air pollution and support the actions of the City Council's Air Quality Strategy 2021-2026, and its successors.

b. To continue to monitor air quality results submitted from selected locations throughout the City in co-operation with the Environmental Protection Agency and support the creation of a regional air quality and greenhouse gas emissions inventory.

Objective 9.19 'External Lighting'

To require that external lighting proposals minimise the harmful effects of light pollution, are energy efficient, and do not have an excessive impact on residential or visual amenity, biodiversity or result in the distraction of road users

Objective 9.20 'Noise'

To support the implementation of the objectives of The Cork Agglomeration Noise Action Plan 2018 – 2023 and promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life

Chapter 10 Key Growth Areas and Neighbourhood Development Sites

The site itself is not identified as a Neighbourhood Development site within the Plan. Wilton is identified as a key growth area in this chapter.

The following objectives are of some relevance:

Objective 10.55 Airport Safety Zones

Implement the policies to be determined by Government in relation to Public Safety Zones for Cork Airport. Additionally, the Obstacle Limitation Surfaces will be safeguarded. Planning applications in the vicinity of these zones will be referred to the Irish Aviation Authority for observations as part of the statutory planning process. Issues such as a proposed development's height and proximity to these zones will form part of considerations. (It is noted that the site lies within the Solar Safeguarding zone of Cork Airport)

Objective 10.94 Wilton

- a. To support the development of Wilton as an area for growth consolidation and enhancement by providing a mix of new neighbourhood uses.*
- b. To support the sustainable redevelopment of the District Centre as a mixed-use, urban-format centre in line with retail and other relevant objectives.*

Chapter 11: Placemaking & Managing Development

Strategic Objective 9: Placemaking and Managing Development

To develop a compact, sustainable City by ensuring the creation of attractive, liveable, diverse, safe, secure and welcoming and well-designed urban places, communities and neighbourhoods that enjoy a high quality of life and well-being.

Proposals for new development will follow a design-led approach with sustainable, high-quality, climate-resilient placemaking at its core. Development should have a positive contribution to its receiving environment delivered by innovative architectural, landscape and urban design, that respects the character of the neighbourhood, creates a sense of place, and provides green spaces and community and cultural amenities commensurate with the nature and scale of the development.

The following planning policy is of relevance:

Overarching Development Principles, Placemaking pp 459 – 460

11.5 All development in Cork City should:

- 1. Contribute to the creation of a sustainable and compact city of neighbourhoods and communities;*
- 2. Be aligned with the development and growth strategy set out in the Core Strategy;*
- 3. Encourage people, jobs and activity within the city centre, urban towns and suburbs;*
- 4. Integrate climate resilience and green practices from design to implementation stage;*
- 5. Integrate alternatives to the private car in their design, prioritising walking, cycling and public transport;*
- 6. Be permeable and connect with its surrounding context and environment;*
- 7. Facilitate inclusivity and equal opportunities for all;*
- 8. Not have detrimental impacts on the receiving environment.*

Statements to Support Development Proposals pp 461 – 463

11.15 *All significant development proposals or proposals for development in sensitive areas should be accompanied by a detailed design statement that provides a framework explaining how a proposed development is a suitable response to the site and its setting.*

Visual Impact Assessments

11.16 *Cork City Council will generally require Visual Impact Assessments (VIAs) to be carried out to demonstrate the visual impact of development proposals likely to have an impact on protected views and views of special amenity value. Other relevant views to be assessed may be identified during the planning application and pre-application consultation stage.*

11.17 *Pre-application consultations with Cork City Council are essential to agree appropriate assessment points for views of strategic and local significance in order to enable the proper visual assessment of a development proposal.*

11.18 *Visual Impact Assessments will be required from panoramic assessment points for development proposals that propose to break the existing city skyline, roofscape or established building heights in an area to enable accurate assessment of their possible impact on panoramic views and vistas of important landmark buildings.*

Cityscape and Building Height pp 463 – 465

11.28 *This Plan sets out a combined building height and density spatial strategy, illustrated conceptually below in Figure 11.1. The strategy is comprised of four sub-areas, each with their own quantitative performance criteria. The density strategy is set out in Chapter 3 Delivering Homes and Communities.*

The building height strategy is outlined in Table 11.1 and will be applied by Cork City Council when assessing development proposals.

11.30 *The building height strategy responds to two key urban design contexts:*

- 1. The prevailing building height in Cork's neighbourhoods and major development areas; and*
- 2. Cork's density strategy set out in Chapter 3: Delivering Homes and Communities, which is based upon an assessment of 'suitabilities' for intensification and sensitivities to change.*

11.31 *An understanding of the character of an area is essential to inform strategies for the development of sites and areas. The Cork City Urban Density, Building Height and Tall Building Study 2021 sets out an assessment of prevailing height based upon an analysis of building heights in Cork City's 44 neighbourhoods.*

Figure 11.1 Density and Building Height Strategy (P.464) shows the site lying within both the 'Inner Urban Suburbs' (within the South West Corridor of same) and the 'Outer Suburbs'.

The site is located in an area which has a prevailing building height of 2.5 storeys – see extract from Figure 11.2: Prevailing Heights below:

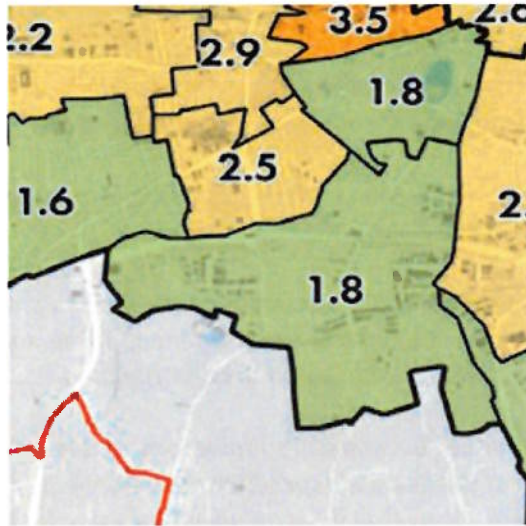


Table 11.1 'Cork Building Height Standards' sets out Prevailing Heights (Lower and Upper) and Target Heights (Lower and Upper) for the City including the Inner Urban Suburbs and the Outer Suburbs. Within the Inner Urban Suburbs (which includes Area 6 South West Corridor) the prevailing heights range from 2 – 3 storeys with target heights between 3 and 4 storeys. Within the Outer Suburbs the prevailing height lies between 2 and 3 storeys and the target heights between 2 and 4 storeys.³

Tall Buildings

11.44 The Cork City Urban Density, Building Height and Tall Buildings Study 2021 provides the basis for the tall building strategy:

1. The definition of a tall building in Cork City;
2. The identification of the City Centre Island Tip / City Docks as the strategic area considered to be suitable for tall buildings in Cork City on the basis of its suitability for the highest forms of high density developments and its inherent lack of sensitivities;
3. The identification of appropriate locations within the City Docks for tall buildings in principle, the area being large enough to include the four sub-location zones;
4. Cork City Council has identified five locations that are considered suitable for landmark medium rise buildings, generally between 10 and 14 storeys, based upon the suitability of locations for higher density, being either regeneration areas or areas with strong suitability due to the proposed LRT corridor. These are Blackpool, Tivoli Docks, Victoria Cross, Mahon and Wilton.

³ Note – Further north of the site part of the Wilton District centre is identified as 'City Fringe, Primary Corridors and Major Urban Centres' within the Density and Heights Maps. Paragraph 11.37 of the Plan states in regard to these areas that 'Existing building heights typically range from 2 – 6 storeys in the city fringe and principal urban corridors, 2 – 5 in Mahon and Blackpool and 2 – 4 in Wilton. To seek to ensure the best use of land is achieved, whilst responding to local context, new development should respect this context.'

Definition of a Tall Building in Cork

11.45 A tall building is defined as a building that is equal to or more than twice the height of the prevailing building height in a specific locality, the height of which will vary between and within different parts of Cork City.

11.46 Within Cork City only buildings above 18m/6 residential storeys are considered 'tall buildings', and only then when they are significantly higher than those around them.⁴

Tall Building Locations

11.47 In order to ensure that proposals of the highest standards are brought forward, specific sites for tall buildings have been identified.

Proposals will need to be developed through a master planning process, and the design process for the building may be subject to Design Review.

11.49 Cork City Council has identified the City Docks as the strategic area for tall buildings in Cork. Four zones appropriate for tall buildings have been outlined. These zones will be the focus for tall buildings in the City Docks which will provide landmarks for the area.

11.51 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.

11.52 Tall buildings in other locations in the "City Fringe, Primary Corridors and Major Urban Centres" sub-area,⁵ which is for dense development that responds to mass transit provision, will be open for consideration insofar as the buildings might be tall compared to the prevailing heights of the area and therefore fall under the definition of tall buildings. The City Docks Tall Building Zones are the only locations considered appropriate for this densest form of development in Cork.

Assessing Impacts of Tall Buildings

Paragraphs 11.53 -11.60 provide detailed guidance in relation to the assessment of development proposals for tall buildings, the application process and development guidance.

Residential Development pp 473-493

Objective 11.1 Sustainable Residential Development

Developments shall be sustainable and create high quality places which:

- a. Contribute to placemaking and to the 15-minute city and walkable neighbourhood concepts by planning for vibrant communities, with active streets, urban greening, versatile and creative use of spaces avoiding "dead" spaces;*
- b. Prioritise walking, cycling and public transport, and minimise the need to use cars;*
- c. Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;*
- d. Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;*

⁴ See also P. 145 of the 'Cork City Urban Density, Building Height and Tall building Study' (Allies and Morrison Limited 2021) which offers this definition of a Tall Building.

⁵ The site lies outside of this zone. The northern section of the Wilton Shopping Centre site (zoned District Centre) and the CUH, Wilton high Street and Bishopstown Road (zoned Neighbourhood and Local Centre) is located in the 'City fringe, Primary Corridors and Major Urban Centres sub-area' (coloured purple on the Density & Height Maps).

- e. Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;*
- f. Are easy to access for all and to find one's way around, with a focus on permeability within sites and integration and connectivity into the surrounding urban environment to enable short trips by walking and cycling;*
- g. Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;*
- h. Provide a mix of land uses to minimise transport demand;*
- i. Promote social integration and provide accommodation for a diverse range of household types and age groups;*
- j. Enhance and protect green and blue infrastructure and biodiversity;*
- k. Enhance and protect the built and natural heritage.*

11.71 *Most of Cork City has been designed around the use of the private car and is built at densities of less than 25 dwellings per hectare in traditional suburban formats, with one particular model of dwelling type, gardens, amenity space and parking. Developing Cork City as a compact city will require housing to be built at higher densities utilising different models of development. Most of the new development in Cork City and the Urban Towns will be built at a "gentle density" of 40-70dph and a scale of 2-4 storeys. Some areas will be developed at densities higher than this (e.g. the City Centre, City Docks, Tivoli Docks, the inner city areas, Blackpool and the light rail corridor at Wilton and Mahon).*

11.72 *Residential densities are set out in Table 11.2. Densities are expressed in terms of minimums and maximums for the constituent areas of the City. Density targets and prevailing character will be the key measures in determining site-specific density. In accordance with relevant s28 Guidelines (e.g. Sustainable Residential Development in Urban Areas) minimum density targets will be applied in the development of all sites, apart from in exceptional circumstances. Area-specific guidance will be prepared by Cork City Council to amplify the standards relevant to major development areas.*

Table 11.2 Cork City Density and Building Height Standards outlines a prevailing floor area ratio (FAR) for the Inner Urban Suburbs (Southwest Corridor) of between 0.2 – 1.5 with a target of between 0.5 and 2.5. The prevailing dwellings per hectare for this area is stated to lie between 20 – 40 with a lower target (dwellings per hectare) of 50 and an upper target of 100. Within the Outer Suburbs the prevailing FAR prevailing is 0-1.5 with a target of 0.2-1.5. Prevailing dwellings per hectare in this zone is 0-25 with a lower target of 40 and an upper target of 60. It should be noted that subsequent to the adoption of the Plan national guidance in relation to density was published – 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024' which supersedes these targets.

Objective 11.2 Dwelling Size Mix

All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances.

The following minimum and maximum and target percentages for the housing mix within the City Suburbs is outlined in Table 11.8 below:

	Min	Max	Target
Studios / PBSA (at LRT Stops / Urban Centre / HEI Campus Only)	0%	15%	10%
1 Bedroom	15%	25%	20%
2 Bedroom	25%	40%	34%
3 Bedroom	18%	38%	28%
4 Bedroom / Larger	5%	15%	8%

Table 11.8: City Suburbs Dwelling Size Mix for Housing Developments.

Housing Quality and Standards

11.89 *The minimum size of habitable rooms for houses and apartments / flats shall conform with appropriate National guidelines or standards in operation at the date of application for planning permission, including the minimum dimensions as set out in 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' (2018), and 'Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007).*

Table 11.10 outlines detailed qualitative design aspects to be addressed in housing developments.

Qualitative Considerations in the Design of Apartment Schemes

11.92 *Government guidance in the form of Sustainable Urban Housing: Design Standards for New Apartments provides the current qualitative guidance for designing apartment developments. Additionally, Cork City Council will seek to ensure that:*

- 1. Communal space within schemes should benefit from excellent daylight and sunlight that exceeds the minimum standards (the scheme layout and volumetric configuration of buildings should optimise solar gain to all spaces). Where daylight and sunlight are at minimum standards, this should be supplemented by rooftop communal amenity space;*
- 2. Communal space is equally accessible to all residents and is tenure blind;*
- 3. Rooftop spaces should be put to productive use for either: green roofs, blue roofs, solar energy, communal rooftop gardens, communal MUGAs, or communal allotments;*
- 4. Green and blue roofs should be designed according to best practice (e.g. Living Roofs and Walls, GLA, 2008).*

Daylight Sunlight and Overshadowing

Achieving urban densities that are higher than 40 dph (a suburban density threshold) will result in a degree of reduction in the amount of daylight and sunlight that homes can expect.

11.96 *In this regard, and in order to maximise available light, glazing to all habitable rooms should generally not be less than 20% of the wall area of any habitable room. Development shall be guided by the principles of 'Site Layout Planning for Daylight and Sunlight, A guide to good practice' (Building Research Establishment Report, 2011) and any updated guidance.*

11.97 *A daylight analysis will be required for all proposed developments of more than 50 units and in relation to smaller applications where there are impacts on habitable rooms and the nature of the impact is not clear (e.g. if simple rules of thumb cannot be effectively applied to determine daylight levels on adjacent properties).*

11.98 *It is very important that DSO assessment is clearly set out to aid the planning assessment and is legible to non-technical people. To this end assessments should include an assessment of the scheme utilising best practice tools, such as BRE guide 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting' to satisfy minimum standards of daylight provision.*

In doing this it is very important that all measures of daylight (Vertical Sky Component, Average Daylight Factor and No Skyline) and sunlight (annual probable sunlight hours) are assessed in order to avoid presenting a partial, or biased, analysis of performance.

11.99 *Assessments should clearly:*

- 1. Assess the DSO levels of the scheme itself;*
- 2. Define appropriate case studies in relation to housing typologies impacted by the development and their DSO performance in relation to approved schemes;*
- 3. Assess the DSO levels of the buildings and spaces impacted by the scheme;*

Objective 11.4 Daylight Sunlight and Overshadowing (DSO) states as follows:

All habitable rooms within new residential units shall have access to appropriate levels of natural/ daylight and ventilation. Planning applications should be supported by a daylight and sunlight design strategy that sets out design objectives for the scheme itself and its context that should be included in the Design Statement. The potential impacts of the proposed development on the amenities enjoyed by adjoining properties will need to be assessed in relation to all major schemes and where separation distances are reduced below those stipulated. Cumulative impacts of committed schemes will also need to be assessed.

Daylight, Sunlight and Overshadowing (DSO) assessment, utilising best practice tools, should be scoped and agreed with the Planning Authority prior to application and should take into account the amenities of the proposed development, its relevant context, planning commitments, and in major development areas the likely impact on adjacent sites.

Separation, Overlooking and Overbearance

11.100 *Privacy and overlooking are important for quality of life. Levels of privacy will gradually diminish as urban densities increase above 25 dph. This will be taken into account in assessing planning applications.*

11.101 *Traditionally a minimum separation distance of 22m between the rear elevations of buildings was required to provide sufficient privacy and avoid overlooking of back gardens.*

This rule-of-thumb was derived from the Parker Morris Standards of 1919 and was intended to provide adequate privacy for people to enjoy their back gardens. Best practice has since evolved, and lesser separation distances are often appropriate, particularly in an urban context, subject to design solutions and site-specific context. All development relevant proposals will be required to demonstrate that they have been designed to avoid overlooking.

11.102 *There are no minimum separation distances for front and street-facing elevations, and distances will generally be derived by the street typology.*

11.103 *Proposals for apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects.*

11.104 *Overbearance in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space servicing a home. In established residential developments any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance.*

11.105 *Overlooking may be overcome by a multitude of design tools, such as:*

- 1. Building configurations (bulk and massing);*
- 2. Elevational design / window placement;*
- 3. Using oblique windows;*
- 4. Using architectural features;*
- 5. Landscape and boundary treatments.*

Quantitative Standards for Housing

11.107 *Cork City Council will seek to ensure that all new houses are designed to excellent design standards. In determining the adequacy of living space, Cork City Council will refer to the minimum standards for apartments, also taking into account the space required for vertical circulation where homes are over two or three floors. Quality Housing for Sustainable Communities (2007) provides a quality reference point that will be taken into account.*

Objective 11.5: Private Amenity Space for Houses

Houses should provide a private garden / terrace, of adequate size and proportions for the size of house proposed. The private outdoor areas should allow space for outside dining and / or clothes drying, with reasonable circulation. Private open space for houses should aim to be at least 48 sqm.⁶ However, it may be acceptable to provide a smaller area where it can be demonstrated that good quality, useable open space can be provided on site.

The following factors will be material in assessing whether adequate space has been provided:

- a. The density of the proposed development;*
- b. The context of the development in relation to the size and layout of existing residential plots and the pattern of development;*
- c. The orientation of the outdoor area in relation to the path of the sun;*
- d. The degree to which enclosure and overlooking impact on the proposed new dwellings and any neighbouring dwellings;*
- e. The overall shape, access to and usability of the whole space to be provided;*
- f. Clear delineation of public and private space (avoiding rear boundaries onto streets and public realm);*
- g. The location of the plot in relation to publicly accessible open space and the offer of that space*

Residential Public Open Space Provision in Housing Developments

11.112 *Public open space for residential developments will normally be required as per Table 11.11, apart from in exceptional circumstances with a general requirement of 10% provision.*

Phased Development

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

⁶ See also current National Guidance in this regard within 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024'.

Adaptable Roof Space

11.158 Homes that are built with a pitched roof should generally be designed to enable extension into the roof space in the future for extra living space without increasing site coverage.

Childcare Facilities

11.162 Childcare is an essential part of sustainable communities. Cork City Council will seek to facilitate the provision of childcare facilities in appropriate locations and may require their provision in large residential, office, retail or community developments. The provision of childcare facilities is subject to the DEHLG 'Childcare Facilities Guidelines for Planning Authorities' (2001) and the Child Care (Pre-School Services) (No. 2) Regulations (2006) and Child Care (Pre-School Services) (No 2) (Amendment) Regulations (2006) (Department of Health and Children).

11.163 Purpose-built childcare facilities will generally be required as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered.

Green and Blue Infrastructure in Development Proposals

11.216 New developments shall promote healthy environments that provide for and encourage active travel. Wherever feasible, active travel routes shall be fully integrated into the design process including, but not limited to, the following: 1. The provision of safe, convenient and direct links, connecting existing green and blue infrastructure networks, schools, community facilities, local amenities, and public transport hubs/bus stops; 2. A design that facilitates different types of users (such as walkers, cyclists and those with limited mobility or sensory impairments) as appropriate; 3. Where appropriate, provide additional seating, signage, cycle parking, storage, etc.

Green and Blue Infrastructure and Sustainable Urban Drainage Systems (SUDS)

11.217 Development proposals shall be designed to integrate naturalised and biodiverse SUDS into the site and wider green and blue infrastructure network. Schemes should replicate natural drainage as closely as possible, maximising benefits for water quality, biodiversity and amenity.

11.218 Development proposals should integrate green and blue infrastructure measures to offset peak flood flows including the following options:

1. Nature-based solutions and "slow-the-flow" initiatives;
2. Incorporation of SUDS to limit runoff from existing and new development;
3. Wetland enhancement on flood plains;
4. Native tree planting and landscaping schemes;
5. Green roofs and green walls;
6. Rainwater harvesting and rainwater boxes;
7. Natural banks, water dykes and water squares;
8. Natural flood management techniques.

Development and Landscape, Natural Environment and Biodiversity

11.222 New development shall be sensitively designed to fit the existing landscape setting, using high quality design and where necessary, landscape mitigation measures that maintain or enhance the landscape.

11.223 Where required, Landscaping Management Plans shall be submitted as part of development proposals detailing existing green and blue infrastructure and showing how opportunities to create new green and blue infrastructure including linkages have informed design, layout and management proposals. Landscaping plans and planting proposals for new development shall include native species of Irish or local provenance.

11.224 All development proposals are expected to:

1. Avoid, or as a last resort satisfactorily mitigate, adverse impacts on existing designated and non-designated habitats. This is in addition to the Appropriate Assessment requirement relating to designated sites;
2. Integrate provision for biodiversity enhancement which may include compliance through public open space, gardens, areas of planting (pollinator friendly planting and native tree species should be prioritised), sustainable urban drainage systems, incorporating green roofs, bee hotels, bird and bat boxes;
3. Avoid adverse impacts, incapable of satisfactory avoidance or mitigation, on mature trees, protected flora, animal or bird species.

11.225 All planning applications for development where there is evidence of alien invasive species on the site are required to submit a management plan for the effective management and removal of the species

Transport and Mobility

Design Manual for Urban Roads and Streets (DMURS).

11.226 The layout of proposed new residential, commercial or mixed-use developments must be designed in accordance with the Design Manual for Urban Roads and Streets (DMURS).

11.227 DMURS sets out design guidance and standards for constructing new, and reconfiguring existing, urban roads and streets, incorporating a multidisciplinary approach to the design of low speed environments in urban areas. A Quality Audit will be required for major developments that impact on the road network and for all new road and traffic schemes. This should be carried out in accordance with DMURS and best international practice.

11.229 Applications for proposed new residential, commercial, mixed use, industrial and educational developments shall be accompanied by a Traffic and Transport Assessment (TTA) to be prepared in accordance with the TII Traffic and Transport Assessment Guidelines, 2014.

11.230 Development proposals that have significant potential for traffic generation must contain a detailed assessment of the following: 1. Both public and private transportation modes available. 2. The impact of the proposed development on the surrounding /receiving environment and transportation network, which must be demonstrated through the submission of a Traffic and Transport Assessment (TTA), in accordance with Transport Infrastructure Ireland (TII) 'Traffic and Transport Assessment Guidelines' (2014). All major road and traffic schemes and existing and proposed developments in an area including residential and other uses including education must be considered as part of TTA preparation.

Car Parking

11.234 The City Council area is divided into four zones for the purposes of car parking control, based on each area's accessibility to mass transit, cycling and walking. Car parking standards for both residential and non-residential developments are set out in Table 11.13. These standards are maximums in order to constrain car trip generation and promote patronage of active travel and public transport.

Table 11.13 of the Plan outlines Maximum Car Parking Standards for sites in Zones which are mapped in Volume 2 of the Plan.

Variation No. 1 (Revised Parking Standards on a City-Wide basis) of the Cork City Development Plan 2022-2028 was made on 08.05.2023.

The site lies within Parking Zone 3 (just outside Parking Zone 2) which has been revised in the Variation as follows:

11.237 *Parking Zone 3 covers the Urban Towns of Ballincollig (excluding the Town Centre), Blarney, Glanmire, Tower, Cork Airport and surrounding areas, City Suburbs including Ballyphehane, Ballyvolane, Bishopstown, Blackrock, Cork Science and Innovation Park, Curraheen, Rochestown, Frankfield and Grange), Dublin Hill, Kilbarry, Knocknaheeny and Holyhill, Lota, Mayfield, Sundays Well, Togher (incorporating Lehanaghmore and Doughcloyne). Bus Connects Cork is proposed to serve these areas of Cork City. It is envisaged that parking standards serving this zone will be reduced to reflect the level of public transport services over time.*

Under Table 11.13 of the Variation the maximum car parking standards within Zone 2 are as follows:

Table 11.13: Maximum Car Parking Standards				
Land Use Category	Zone 1	Zone 2	Zone 3	Zone 4
	City Centre & Inner City	Accessible to mass transit (existing/ committed public transport).	City Suburbs	Urban Towns, Hinterland Villages and Hinterland
Maximum Standards: 1 space for each unit of gross floor area sq m unless otherwise indicated.				
RESIDENTIAL DEVELOPMENT				
Residential (1-2 Bed)	0.5	1	1.25	1.25
Residential (3-3+ bed Unit)	1.0	2.0	2.25	2.25
Creches	1 per 6 children	1 per 6 children	1 per 6 children	1 per 6 children

National policy in relation to parking provision for apartment developments is outlined in the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2022* as outlined above.

Disabled Parking

11.241 *5% of car parking spaces provided should be set aside for disabled car parking. Where the nature of particular developments is likely to generate a demand for higher levels of disabled car parking, the Planning Authority may require a higher proportion of parking for this purpose.*

Electric Vehicle Parking

11.242 *To encourage the use of Electric Vehicles (EV) developments shall provide the following minimum standards for EV charging points and infrastructure:*

1. *Multi-unit residential developments shall provide a minimum of one EV equipped parking space per five car parking. All other parking spaces shall be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs.*

Motorcycle Parking

11.244 *Motorcycle parking should be provided to meet the requirements of any development. Parking spaces should be provided on the basis of one motorcycle parking bay per 10 car parking spaces provided for non-residential developments and apartment developments.*

Bicycle Parking

11.245 *Bicycle parking facilities shall comply with the standards set out in Table 11.14 and be sheltered where possible and located close to main building entrances so that parking is both*

convenient and benefits from the direct surveillance of passers by. Bicycle stands should allow both the frame and wheels to be securely attached to a steel tube against which the frame of a bike can be leant and locked. These can either take the form of steelwork required for other reasons (e.g. tree guards or balustrade rails), or special stands. Stands should be similar to the "U" Sheffield type. However, Cork City Council is prepared to consider innovative types which satisfy the above requirement. Detailed guidelines in respect of cycle parking may be prepared during the lifetime of this Plan.

The bicycle parking standards outlined in Table 11.9 of the Plan have been superseded by the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2022

Solar Energy

11.249 Solar energy has the potential as a clean source of energy to reduce dependence on fossil fuels and help achieve climate change targets on greenhouse gas emissions. The retrofitting of existing buildings and the integration of solar infrastructure into the design of new buildings will generally be encouraged.

Water Supply and Waste Water

11.254 All new developments will be required to connect to the public water and wastewater network, where available (or likely to be available). Applicants who need to get a new or modified connection to public water supply or wastewater collection infrastructure must liaise with Irish Water.

Surface Water

11.257 Surface water attenuation and disposal details shall be included with any application. Details should show how surface water from the site can be disposed of within the boundaries of the site and shall not discharge onto the public road or adjoining property.

Sustainable Urban Drainage Systems (SUDS)

11.258 All new developments (including amendments /extensions to existing developments) will generally be required to incorporate Sustainable Urban Drainage Systems (SUDS), which offers a total solution to rainwater management and is applicable in both urban and rural situations. SUDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakaways and green roofs. Development proposals will be required to be accompanied by a comprehensive SUDS assessment that addresses run-off quantity, run-off quality and its impact on the existing habitat and water quality.

Soil Protection, Contamination and Remediation

11.268 As part of major development proposals, adequate soil protection measures should be undertaken where appropriate. Appropriate investigations should be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, where brownfield development is proposed. The EPA's publication Code of Practice: Environmental Risk Assessment for Unregulated Waste Disposal Sites (2007) should be considered as relevant.

Management of Construction Sites

11.269 It will be a requirement of any major planning permission for residential, community, employment, or, infrastructure related development that a Construction and Environmental Management Plan (CEMP) be prepared for the construction phase of the development. The Construction and Environmental Management Plan should include details such as:

1. Hours of operation;
2. Construction/phasing programme;
3. Traffic Management Plan;
4. Noise and Dust Mitigation Measures;
5. Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats;
6. The management of construction and demolition waste;

Refuse Storage

11.270 Adequate bin storage provision shall be made for the storage, segregation, and recycling of waste in residential developments. In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. These shall be well screened from public view and adequately ventilated.

Scheme Sustainability Statements

11.271 The built environment will play a key role in addressing climate change mitigation and adaptation and all development proposals will be encouraged to explore and incorporate climate action measures. Large scale development proposals will be expected to demonstrate how this has been taken forward through the evolution of the scheme by submitting a Scheme Sustainability Statement in support of the planning application(s) across all stages of development from construction through to operation of the building(s).

11.272 All planning applications involving developments of 25 or more homes or over 500sqm of commercial floorspace to be accompanied by a Scheme Sustainability Statement demonstrating how the proposal positively responds to the impact of climate change through mitigation and adaption measures. The Scheme Sustainability Statement is required, as a minimum to demonstrate how the following climate change mitigation and adaptation considerations inform the proposal:

1. How the location, siting, layout, design and drainage proposals maximise climate adaptation opportunities;
2. How the SUDS strategy integrates the four pillars of SUDS Design – water quantity, water quality, amenity and biodiversity;
3. The use of green roofs other green infrastructure as a means of contributing towards sustainable urban drainage, improving biodiversity and influencing heat loss/gain from the building;
4. Energy efficiency through thermal insulation, passive ventilation and cooling, passive solar design and any technologies used to help occupants better manage energy usage;
5. The use of district, renewable and/or low-carbon energy supply opportunities;
6. How the proposals at all stages embrace the Circular Economy approach in relation to waste management from construction through to the operation of the building(s);
7. How noise and air pollution will be managed
7. Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater);
8. A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains.
9. Details of a water quality monitoring and sampling plan;
10. Measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed);
11. If peat is encountered - a peat storage, handling and reinstatement management plan.

The EPA's Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects will provide guidance for the preparation of Construction and Environmental Management Plans.

11.273 As part of the Scheme Sustainability Statement, applicants will be required to demonstrate how these considerations were explored and taken forward through the evolution of the development proposal and where they have not been taken forward, reasons are given as to why the measures were not technically feasible or viable. The level of information and commitments within the Statement should be proportionate to the scale and complexity of the development proposal.

6. Section 247 Consultation with the Planning Authority

A pre-planning consultation meeting took place on 04.06.2024 with items on the Agenda being:

- *Layout/Heights/Placemaking/Density and Public Open Space;*
- *Roads/Traffic/Permeability and Connectivity/Sustainable Active Travel/Future Proofing development;*
- *Irish Water feedback/DSuDS and Nature Based Solutions;*
- *Part V/Housing Mix and Location;*
- *Environment;*
- *Noise/Air Quality.*

Minutes of the meeting including additional feedback sent to the applicant subsequent to the meeting are available in Appendix B.

7. LRD Meeting

A meeting under Section 32C of the Planning and Development Act 2000 (as amended) took place via Microsoft Teams on 19.09.2024 between representatives of the prospective applicant and Cork City Council.

The main topics discussed at the meeting were: -

- *Revised proposals since S 247 meeting;*
- *Permeability;*
- *Boundary treatments;*
- *Single aspect units*
- *Creation of greater street edge to Sarsfield Road;*
- *Creche facility/phasing*
- *Tree life/landscaping*
- *Cycle parking provision.*

In accordance with the requirements of Article 16A(8) of the Planning and Development Regulations 2001 (as amended), the record of the meeting is attached to this report as Appendix B.

8. Cork City Council Internal Consultation

In accordance with section 32B(4) of the Planning and Development Act (as amended), comments on the submitted documentation were sought from the following sections within Cork City Council:

- City Architect's Section;
- Drainage;
- Environment;
- Infrastructure;
- Traffic Operations including Public Lighting;
- Urban Roads & Street Design (Planning);
- Parks & Recreation Section including Biodiversity Officer
- Archaeology.
- S.E. Transport Officer.

The responses to the request for comments on the Opinion documentation from internal consultees are included in Appendix C.

9. External Consultation/Prescribed Bodies

External submissions have been received from the I.A.A., Cork City Childcare, Inland Fisheries, T.I.I. N.T.A. and Uisce Eireann and are included in Appendix D.

10. Forming of the Opinion

10.1 Documentation Submitted

The prospective applicant has submitted documentation, including the information required under Article 16A(5), which includes drawings of the proposed development and various reports including the following:

- Cover letter
- Pre-application consultation application form
- Planning Report and Statement of consistency
- Social Infrastructure Audit
- School Demand Assessment
- Childcare Demand Assessment
- Outdoor Lighting Report
- Landscape Strategy Report and Masterplan
- LVIA
- Landscape Masterplan
- Hardscape & Softscape Plan
- Contaminated Land Technical Note
- Noise Impact Assessment
- Air Quality Report
- Daylight and Sunlight (Internal Daylight Sunlight and Overshadowing report
- Archaeological Impact Assessment
- Arboricultural Report

- Tree Constraints Plan
- Tree impact and Protection Plan
- Tree Scheule
- CGis Photomontages verified Views
- Infrastructure Report & Flood Risk Assessment
- Energy & Heating Strategy Comparison
- Construction and Operational Waste Management Plan
- Resource Waste Management Plan
- Traffic and Transportation Assessment & Mobility Management Plan
- AA Screening Report
- Ecological Impact Assessment
- EIAR screening report

10.2 Statement of Consistency

Section 32B(2)(ga) of the Act of 2021 requires the submission of a statement setting out how the proposed LRD has had regard to the relevant objectives of the development plan in whose area the proposed LRD would be submitted.

A Statement of Consistency has been submitted, which considers compliance with the provisions of the following policy documents:

- The National Planning Framework (2018 and Draft 2024)
- Southern Regional Assembly: Regional Spatial and Economic Strategy
- Cork Metropolitan Area Transport Strategy CMATS 2040 (2020)
- Sustainable Residential Development and Compact Settlements Guidelines 2024
- Urban Development and Building Heights Guidelines (2018)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2023
- Climate Action Plan 2024
- Design Manual for Urban Roads and Streets (DMURS)
- Part V of the Planning and Development Act 2000 Guidelines
- Architectural Heritage Protection Guidelines for Planning Authorities 2011
- The Urban Design Manual a Best Practise Guide 2009
- The Planning System and Flood Risk Management (2009)
- Appropriate Assessment of Plans and Projects – Guidelines for Planning Authorities 2009
- Childcare Facilities Guidelines
- Cork City Development Plan 2022-2028

The statement does not consider that a material contravention of the Development Plan will arise.

10.3 Appraisal

Based on the information submitted by the applicant in accordance with section 32B of the Planning and Development Act 2000 (as amended), it would appear that the proposed development falls within the definition of large-scale residential development, as set out in section 2 of the Planning and Development Act 2000 (as amended).

Having examined and considered the information submitted by the applicant, the submissions from the internal and external consultees, the discussions that took place at the LRD meeting, and having regard to national policy including the National Planning Framework and Section 28 Ministerial guidelines, regional policy including the RSES, the Cork City Development Plan 2022-2028, it is recommended that the planning authority serve a notice on the prospective applicant as outlined below.

10.4 Conclusion

It is recommended that the Planning Authority serve a notice on prospective applicant, pursuant to Section 32D of the Planning and Development Act 2000 (as amended), stating that it is of the opinion that the documentation submitted with the consultation request under Section 32B of the Planning and Development Act 2002 (as amended) **requires further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD.**

It is also recommended that the prospective applicant be notified, pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), that specified information (as outlined hereunder) be submitted with any application for permission that may follow. It is considered that the specified information will assist the Planning Authority at application stage in its decision-making process.

11. Recommended Opinion

The Planning Authority refers to your request pursuant to section 32B of the Planning and Development Act 2000 (as amended). Section 32D of the Planning and Development Act (as amended) provides that the Planning Authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the consultation process the Planning Authority is of the opinion that the documentation submitted requires further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD.

1. (a) Further consideration of and possible amendment of the development in terms of the height of the development and its potential visual impact. In this regard you are requested to note that under Paragraphs 11.45 and 11.46 of the Cork City Development Plan 2022-2028 a Tall Building is defined as buildings above 18m/6 residential storeys. Paragraph 11.51 and 11.52 of the Plan should also be noted in this regard as well as the site's location outside of the 'City Fringe, Primary Corridors and Major Urban Centre' as defined in the Density and Heights Map 08 in Volume 2 of the Plan. It should also be noted that planning applications for Tall Buildings guided by detailed guidance within the Plan (see Paragraphs 11.59 in particular and 11.53 – 11.60).

(b) Further consideration of the visual impact of the scheme including an assessment of whether the development would break the skyline when viewed from Sarsfield Road north and south and the potential impact on linear views of Landmark Buildings such as County Hall and Our Lady's Hospital (See also Item 4(a) below in this regard). Prior to the carrying out of a detailed visual impact assessment it is recommended that a balloon test be carried out on site in order for the Planning Authority to determine suitable viewing assessment points having regard to the variation in ground levels in the surrounding area.

As advised at pre-planning stage there may be scope to increase height to the west of the site to support an appropriate density level on this site – there may be scope to introduce duplex units and/or apartment units in this location. In addition it may be prudent to reduce the floor-to-ceiling heights in certain locations. Further consideration of the lowering of ground levels in this location is also recommended.

See also Item 4(a) below and note that the Planning Authority would welcome the opportunity to discuss any revised proposals prior to the formal submission of the planning application.

2. Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the City Architect's Section.

3. Further consideration of the scheme and amendment of proposals/revised drawings/details to provide for active permeability through the site on cycle/foot through to Cardinal Court – Note the dwellings backing onto Cardinal Court should be redesigned to take into account then need for passive surveillance along this route (Objectives 2.10, 2.14 and 4.5 of the Plan).

4. Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the Objective 3.6 Housing Mix and the min/max and targets for dwelling size mix as outlined within the Table 11.8 of the Cork City Development Plan 2022-2028 noting the under provision of 3 and 4 bed units and overprovision of 1 and 2 bed units within the proposal.

5. Further consideration of the scheme and amendment of proposals to take into account the report of the Biodiversity Officer.

6. Further consideration and proposals to take into account Uisce Eireann submission and the report of the Drainage Section in relation to wastewater.

7. Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the E.E. Environment Section.

8. Further consideration of the scheme and amendment of proposals/revised drawings/details to address the report of the Senior Executive Transport Officer.

9. Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the report of the S.E.E. Urban Roads and Streets Design Section.

10. Further consideration of the scheme and amendment of proposals/revised drawings/details to take into account the report of the E.E. Traffic & Regulation Section.

11. Further consideration of revised proposals/drawings/details to address the comments of the Public Lighting Section. Please note that these comments should be considered in conjunction with comments of the Biodiversity Officer in relation to protection of bat species and may require modification to take account of same.

12. Further consideration of revised proposals/drawings/details to address the comments of the A/Senior Parks & Landscape Officer including further consideration of the design of communal amenity space areas including the design of small play spaces and play areas as outlined in Paragraph 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) and Objective 3.32 of the Plan 'Inclusive Design' – in relation to the podium levels.

13. Further consideration of the scheme and amendment of proposals to take into account the submission received from Cork City Childcare which recommends provision of a creche with a capacity of 157 children. In addition further consideration and an amendment of phasing strategy is required in order to ensure delivery of the creche in Phase 1.

14. Further consideration of the scheme and amendment of proposals to take into account the submission received from the I.A.A.

15. Further consideration of the scheme and amendment of proposals to take into account the submissions received from T.I.I. and N.T.A.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

Furthermore, pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 20A, 22 and 23 the following specific information should be submitted with any application for permission. These are in addition to the information submitted at Opinion stage which should be updated accordingly having regard to any changes which are proposed as a result of the above.

1(a). All additional studies/updated reports as recommended by the various Section reports (see attached).

2(a). A revised Schedule of Accommodation updated to reflect any design changes and correcting any discrepancies (e.g. it is noted for example that two Schedules Rev C and Rev D – both of which refer to a 2-6 storey development. In addition it should be noted that Variation No 1 of the Plan and the location of the site within parking zone 3 in the Cork City Car Parking Zones map in Volume 2 of the Plan should be referenced in relation to parking standards.

3(a). Updated Schedule documents to demonstrate compliance with the relevant national minimum standards for housing and apartments.

4(a). A fully comprehensive Landscape and Visual Impact Assessment arising from further assessment and selection of further assessment viewing points as outlined to Item 1 above. At a minimum it is recommended that the following additional viewing points be assessed and photomontages of the proposed development submitted from these locations:

- Sarsfield Road heading south from the Wilton roundabout at a number of locations;
- Sarsfield Road heading north at additional locations;
- Sarsfield Road heading north at the junction with the westbound slip before the roundabout;
- Sarsfield Road north of the roundabout where views are currently available of County Hall and Our Lady's Hospital (close to junction with Eagle Valley);
- From within the Doughcloyne Industrial Estate where views of the site are available;
- From the N40 on the descent from the flyover of the Bandon Road Roundabout heading east;
- Other locations along the N40 where the ESB mast is visible in both directions east and west;
- From within the Tesco car park and staff car park;
- From Bishopstown Road where views of St. Joseph's Church are available.

5(a). Revised and updated photomontages to take account of any alterations to the proposed design.

6(a). A revised and updated Landscape Masterplan taking into account design changes made on foot of the above including comments of Parks and Recreation Section viz-a-viz play spaces and SuDs details.

7(a). A Statement of Design Acceptance (S.O.D.A.) from Uisce Eireann.

8(a). A statement on how the development has incorporated placemaking and how the proposal would respect, reflect or contribute to the character and vibrancy of the particular neighbourhood, centre or area, commensurate with the nature and scale of the development, and how the development would deliver or contribute towards a quality urban environment and public realm with a focus on accessibility, pedestrian priority and permeability.

9(a). A statement on how the development has considered climate resilience from design to implementation stages.

10(a). A Scheme Sustainability Statement (Objective 5.16 and Chapter 11 of the Plan) demonstrating how the proposal positively responds to the impact of climate change through mitigation and adaption measures. It should be noted that as per Paragraph 11.273 of the Plan *'As part of the Scheme Sustainability Statement, applicants will be required to demonstrate how these considerations were explored and taken forward through the evolution of the development proposal and where they have not been taken forward, reasons are given as to why the measures were not technically feasible or viable. The level of information and commitments within the Statement should be proportionate to the scale and complexity of the development proposal.'*

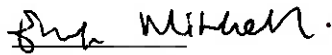
11(a). The Submission of an updated Daylight and Shadow Study to take full account of all proposed development and proposed amenity spaces and all existing surrounding residential properties (Cardinal Court) and their amenity spaces following amendments to the Scheme as outlined above. The Daylight and Shadow Study should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity/garden/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 such as 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' and the new guidelines published in 2022. 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. *Note - it is very important that all measures of daylight (Vertical Sky Component, Average Daylight Factor and No Skyline) and sunlight (annual probable sunlight hours) are assessed in order to avoid presenting a partial, or biased, analysis of performance.*

12(a). An updated Childcare Demand Assessment Report taking into account the submission from Cork City Childcare.

13(a). An Updated Schools Demand Assessment clarifying level of pupils on waiting lists for enrolment years noting oversubscription in nearby primary and secondary schools.

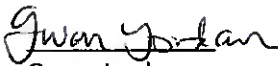
PLEASE NOTE:

Under sections 32E and 247(3) of the Planning and Development Act 2000 (as amended), neither the carrying out of pre-application consultations nor the taking place of an LRD meeting and the provision of an LRD opinion (where applicable) shall prejudice the performance of the planning authority of its functions under this Act or any Regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.



Evelyn Mitchell

Senior Executive Planner



Gwen Jordan

A/Senior Planner



Rebecca Loughry

Director of Services

Appendix B – Scheme Sustainability Statement

As Per Objective 5.16 and Chapter 11 of the *Cork City Development Plan 2022-2028*, we note that the proposed scheme is fully compliant with the objective to encourage development proposals to consider use of renewable energy infrastructure from the project inception stage with planning applications for larger development schemes.

We note that the built environment will play a key role in addressing climate change mitigation and adaptation and all development proposals will be encouraged to explore and incorporate climate action measures. Accordingly, a *Scheme Sustainability Statement* has been prepared to support the proposed development. This is outlined briefly below.

1. How the location, siting, layout, design and drainage proposals maximise climate adaptation opportunities.

The proposed development is designed to maximise climate adaptation opportunities through careful location, siting, layout, design, and drainage measures. The proposed development has been formulated to directly respond to recommendations arising from the Flood Risk Assessment, prepared by BMCE, to avoid impact on vulnerable areas in the locality, while incorporating permeable surfaces and landscaping to mitigate flow rates, that may increase over time due to climate change. Building orientation optimises passive solar gain, while reducing energy demand and minimising the formation of dark living spaces. The drainage strategy integrates Sustainable Urban Drainage Systems (SUDS) to manage surface water effectively, as outlined in the enclosed *Infrastructure Report* prepared by BMCE.

2. How the SUDS strategy integrates the four pillars of SUDS Design – water quantity, water quality, amenity and biodiversity.

The SUDS strategy for the development aligns with the four pillars of SUDS design:

- **Water Quantity:** Use of extensive green roof provision, tree pits, bioretention and permeable paving to reduce surface water runoff and prevent localised flooding.
- **Water Quality:** Installation of hydrocarbon interceptors, bioretention and tree pits are also proposed to treat pollutants before water reaches the drainage network.
- **Amenity:** Inclusion of tree pits are noted, which will integrate with the proposed landscape strategy, to enhance the public realm.
- **Biodiversity:** Creation of habitat-rich green spaces, green roofs and podium gardens are noted, which will support local wildlife. These are integrated with bat boxes to and maximising retention of existing trees on site to avoid, where possible, disturbance to existing habitats.

3. The use of green roofs other green infrastructure as a means of contributing towards sustainable urban drainage, improving biodiversity and influencing heat loss/gain from the building.

Extensive green roofs are incorporated into the development to enhance sustainable urban drainage, while contributing to biodiversity. These will also assist in the regulation of building heat loss/gain. These roofs provide insulation, reduce stormwater runoff, and improve air quality. Additional green infrastructure elements, such as tree pits will further support urban cooling and ecological connectivity.

4. Energy efficiency through thermal insulation, passive ventilation and cooling, passive solar design and any technologies used to help occupants better manage energy usage.

The development prioritises energy efficiency through:

- **Thermal Insulation:** High-performance building envelopes to reduce heat loss.
- **Passive Design:** Optimised window placement for natural daylighting and ventilation.
- **Cooling Strategies:** Extensive green roofs to minimise overheating.
- **Energy Management:** The design team has considered a number of energy strategies led by a fabric first approach combined with a number of heating options including centralised, district and individual home heating systems analysis, to be established in a Heating Strategy Comparison Report – please refer to drawings and documents from EDC Engineers that accompany this application.

Please also refer to the enclosed Architectural Design Statement prepared by Reddy A+U for further information regarding energy efficiency design considerations.

5. The use of district, renewable and/or low-carbon energy supply opportunities

As noted above, a detailed Heating Strategy Comparison Report has been prepared by EDC and this is enclosed with the Planning Application. The following heating strategies have been included in this study.

- Exhaust Air to Water Heat Pump (EAHP)
- Hot Water Heat Pump + MVHR + Electric Radiators (HWHP)
- Centralised Heating with Air to Water Heat Pump + HIU (CH: AWHP+HIU)

Please refer to the enclosed Report for further information in this regard.

6. How the proposals at all stages embrace the Circular Economy approach in relation to waste management from construction through to the operation of the building(s);

The development embraces circular economy principles, ensuring resource efficiency at all stages. Use of efficient construction techniques to minimise waste, and incorporation of recycled materials is noted in the enclosed Construction and Operational Waste Management Plan, and this has had regard to the *Waste Action Plan for Circular Economy, Ireland's National Waste Policy 2020-2025*. The appointed contractors and management companies will be required to develop an updated construction and operational waste management plan prior to the commencement of each phase. The implementation of all management measures will ensure that the construction programme will be completed without significant adverse effects on the surrounding environment and minimise waste disposal as far as is possible, while also ensuring that circular economy considerations are adopted, where possible.

7. How noise and air pollution will be managed across all stages of development from construction through to operation of the building(s).

To mitigate noise and air pollution:

- **Construction Phase:** Implementation of dust suppression measures, low-emission construction machinery, and site noise barriers, as per the Construction Management Plan for the scheme.

- **Operational Phase:** High quality landscape proposals will act as green buffers and acoustic barriers to reduce traffic noise within the proposed development. In addition, high-quality glazing is proposed in this regard to protect future residents. Promotion of sustainable transport options (e.g., EV charging points, cycling infrastructure) to minimise vehicle emissions are also noted within the scheme. Air Quality Monitoring, which is currently underway, are also to be provided to the Local Authority.

The proposed development fully complies with the sustainability requirements of the *Cork City Development Plan 2022-2028*. All key considerations have been explored, and viable measures have been integrated into the design and implementation of the project. Where certain sustainability strategies were not feasible, robust justifications have been provided in the enclosed documentation. This *Scheme Sustainability Statement* demonstrates a proportionate and comprehensive approach to sustainable design, ensuring that environmental, social, and economic sustainability objectives are met at all stages of the development process.