COAKLEY O'NEILL
town planning

Building Height Rationale

Kinsale Road LRD

Prepared in April 2025 on behalf of

BML Duffy Property Group Limited.

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1.0 INTRODUCTION AND PURPOSE

1.1 BML Duffy Property Group Limited seek planning permission for the development of a new residential neighbourhood in the form of a Large-scale Residential Development LRD at a brownfield, infill site known as the Former Vita Cortex Site, Kinsale Road/Pearse Road, Cork City.

1.2 The proposed development will consist of a Large-Scale Residential Development (LRD), comprising 170no. residential units (158no. apartments and 12no. townhouse apartments, to include 51no. 1-bed units, 84no. 2-bed units, 35no. 3-bed units) arranged in 4no. blocks varying in height from four to nine storeys over ground. The proposed development also includes a crèche; café; management office; 4no. retail units; car parking and cycle parking provided on surface and within an undercroft; the provision of private, communal and public open space and all associated site development, landscaping and drainage works on the site of the Former Vita Cortex Facility, Kinsale Road and Pearse Road, Cork.

1.3 As noted above, the proposed development includes 4no. blocks varying in height from four to nine storeys over ground. Specifically, the proposed development includes the following height variations:

Block	Height (over ground)
1	4 storeys
2	4 storeys
3	part 8 storeys, part 9 storeys
4	4-6 storeys

Table 1: Proposed Heights

1.4 Table 11.2 of Chapter 11 of the Cork City Development Plan 2022 (the Plan) specifies that the target height for the Inner Urban Suburbs is 2-4 storeys. Blocks 1 and 2 facing Pearse Road are within the acceptable range.

1.5 In this context, this report hereunder sets out the rationale for the proposed building heights of Blocks 3 and 4 having regard to the provisions of national, regional and local planning policy, and in particular:

- the Neighbourhood Development Site designation that applies to the site, and
- its Neighbourhood and Local Centre (ZO 8) zoning objective.

1.6 In addition, the height of Blocks 3 and 4 require consideration in the context of precedence established by recent permitted developments in the vicinity, which enjoyed the full support of Cork City Council, including the immediately adjacent 5-storey Part 8 residential development on the former Top Tile site, the Creamfields SHD residential development of between 1, 3, 4, 6, 9-15 storeys (ABP Ref. No. ABP-312866-22) and the adjacent Primary Care Centre (PA Ref. No. 22/40906) of between 4-7 storeys to the south.

2.0 SITE LOCATION AND DESCRIPTION

2.1 The infill, brownfield site is the location of the former Vita Cortex manufacturing facility on Kinsale Road and is approximately 1.21 ha[1]. The site is bounded to the east the Kinsale Road and to the west by Pearse Road. The Planning Statement that accompanies the application describes the site in further detail.

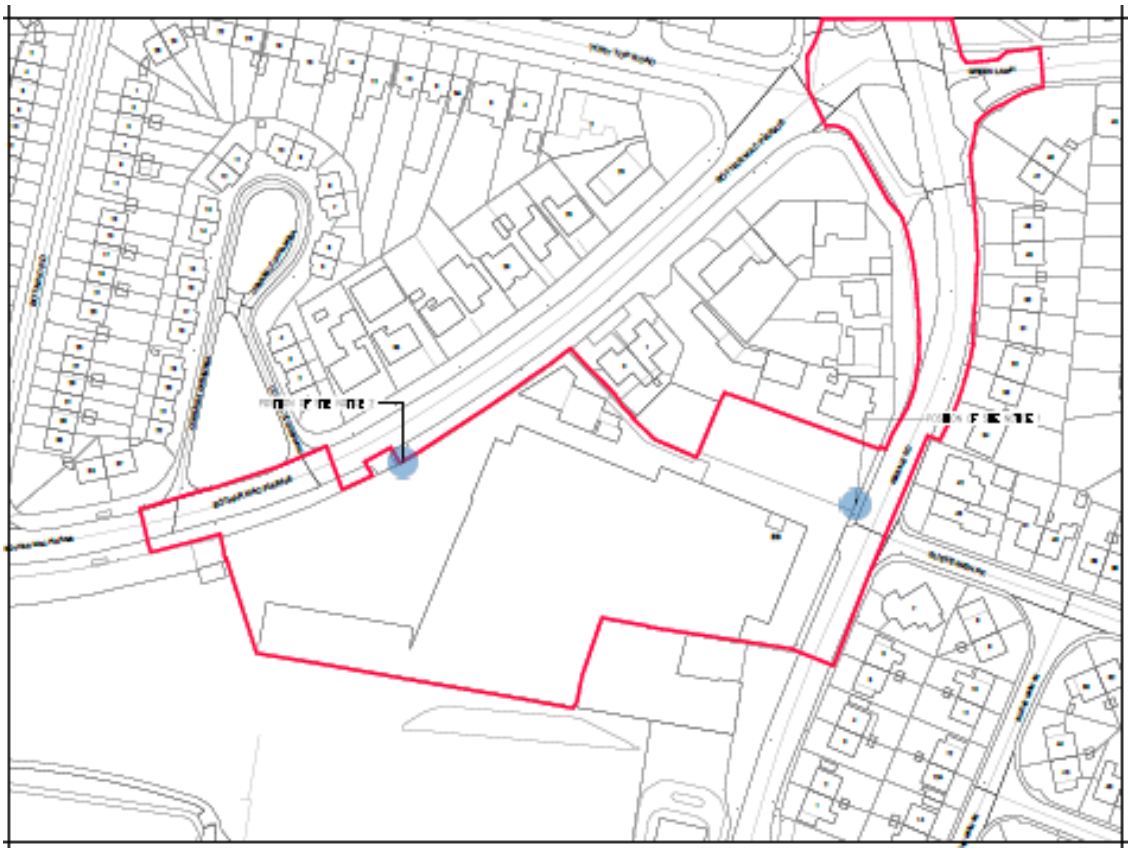

Plate 1: Site generally outlined in red

3.0 BUILDING HEIGHT RATIONALE

3.1 The justification for the height of proposed Blocks 3 and 4 is presented in the context of:

- The NPF[2]'s population growth target of at least 50-60% for Cork City and its suburbs by 2040, to facilitate Cork becoming a city of scale which can compete internationally and be a driver of national and regional growth, investment and prosperity.

[1] The proposed full extent of the red line boundary includes part of both the Kinsale Road and Pearse Road to facilitate service connections.
[2] The Government approved the Revised NPF on 8th April, 2025, subject to the approval of both Houses of the Oireachtas. Predicated on the Census 2022 population increase to 5.7m people, and reinforcing the requirement for compact urban growth, the Revised NPF anticipates a further increase of between 6.1m and 6.3m by 2040, requiring, as set out in National Policy Objective 42, approximately 50,000 new homes per annum for the next 15 years. National Policy Objectives 4 and 8 of the Revised NPF supports ambitious growth targets to enable the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% over 2016 levels to 2040 within their existing built-up footprints to become cities of scale, capitalising on the potential of underutilised sites such as the proposed development site, to support an increase in population and a more compact urban form, facilitated through well-designed higher density development.

- National Policy Objective (NPO) 2a which envisages a target of half (50%) of future population (and employment) growth in Cork to be focused on Cork City and its suburbs.
- The NPF's focus on compact growth as the preferred spatial development approach, with increased residential densities at locations accessible to sustainable modes of transport and high-quality education, services and amenities, such as the proposed development site.
- National Policy Objective 3a: which seeks to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.
- National Policy Objective 4, which seeks to 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 5, which seeks to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment, and prosperity.
- National Objective 11, which notes that, 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 Objective 13, which notes that 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. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.
- National Policy Objective 35, which seeks to 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 and increased building heights.

3.3 Critically, the NPF specifically identifies infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects will be a key growth enabler for the future development of Cork. In this respect, the proposed development site is an infill site that is brownfield and is suitable for regeneration, having been cleared and remediated for intensified housing development purposes, to include high quality public realm for the benefit of future residents.

3.4 In the context of the NPF and Revised NPF, we note the Chief Executive's Report dated 21st April, 2022 on the Creamfields SHD residential development of between 1, 3, 4, 6, 9-15 storeys (ABP Ref. No. ABP-312866-22), which stated that:

> *The Planning Authority has examined the proposed building heights of the development, within the context of the established development in the area. It is considered that the overall increases in building height are justified in the context of the transformational impact of the redevelopment of the site and the likely catalyst impact it will have to encourage other similar sites in the area to come forward for redevelopment.* (Section 8.9, CE Report, Creamfields SHD)

3.5 It is further noted in Section 8.9 of the Chief Executive's Report that *the Planning Authority considers that the gradual increase of building height sits comfortably within the streetscape*.

3.6 The Planning Authority has, therefore, contemplated that sites in the vicinity of the Creamfields SHD would be brought forward for development in response to the transformational effect of the SHD, and that the area has the capacity to absorb a gradual increase in building height on foot of the SHD, while stepping up from the prevailing 2 storey height to the 15 storey height of the landmark tower permitted for the corner of Kinsale Road and Tramore Road.

Plate 2: Proposed Development in the context of the permitted developments in the immediate vicinity

Plate 3: Proposed Development in the context of the permitted developments in the immediate vicinity

Plate 4: View from Kinsale Road to the south-west

Plate 5: View from Kinsale Road to the south-west (cumulative)

Plate 6: View from Kinsale Road to the north-west

Plate 7: View from Kinsale Road to the north-west (cumulative)

Plate 8: View from Tramore Valley Park to the north-west

Plate 9: View from Tramore Valley Park to the north-west (cumulative)

3.7 Plates 2-9 illustrate what the transformational effect of the Creamfields SHD looks like in context, with the permitted Part 8 residential scheme and the proposed development mediating in height from the prevailing 2 storey character to the permitted 15 storey landmark tower.

3.8 Plates 2-9 also demonstrate the propriety of the gradual increase in height from the 4 storey presentation of Block 4 to the north and north-east, stepping up in height to 6 storeys to the east and south to address the corner fronting Kinsale Road, the internal plaza, and the permitted 5 storey Part 8 scheme, with the principal elevations articulated and coloured/cladded to provide visual interest and enliven the massing of the Block, with horizontal banding over the ground floor level on the principal elevations to ensure that

Block 4 integrates successfully with the existing streetscape. Block 4 and the permitted Part 8 scheme establishes a coherent urban frontage along Kinsale Road.

3.9 The same approach has generally been taken to the design of Block 3, with a combination of articulated elevations, materiality, and colour to achieve a simple, elegant composition, which break down the scale of the Block and emphasise its verticality.

3.10 Block 3 is the internal centrepiece of the overall scheme, with the height of part 8, part 9 storeys seeking to emphasise it as a special location in the urban fabric of the proposed development and positively contributes to placemaking and identity. In addition to housing the scheme's management office, Block 3 provides a café at ground level directly facing the central focal plaza area, as well as a creche facility for future residents of the scheme. It also performs a vital function in masking the undercroft car park.

3.11 The approach to locating the tallest Block, Block 3 internally within the site, with a progressively rising form for Block 4 that steps up to Block 3, assists in mitigating its visual impact, and integrates the taller Block 3 into the scheme, enhancing the legibility of this part of the city. Block 3 will become a way marker for the area, and contribute to a strong sense of identity.

3.12 Block 3, in conjunction with Block 4, and the lower Blocks 1 and 2, also operates visually as an intermediary between the traditional suburban development in the locality and the permitted landmark Creamfields SHD, in an area of transformation, guided by policy and precedent, that is transitioning into a modern city precinct, with contemporary architecture, a mix of uses and higher densities. In this context, the scale, form and character of the scheme, in particular Block 3, is considered to be appropriate, and, therefore, justified.

3.13 The location and configuration of Block 3 relative to Virgin Media Park to the south also avoids the potential for overbearing or overlooking of any sensitive receptors.

3.14 The view from Tramore Valley Park illustrates that proposed Block 3 will be visible, but not intrusive, and, of a lower scale than the permitted Creamfields SHD which will be the predominant landmark development for the area.

3.15 The proposed development, in particular Block 3 and 4, is further justified by reference to the Urban Development and Building Heights Guidelines 2018.

3.16 Couched in the principles of National Policy Objectives 11 and 13 of the NPF, these Guidelines are premised on there being "*a presumption in favour of buildings of increased height in our town /city cores and in other urban locations with good public transport accessibility*" (para 3.1). They require Local Authorities in their plans to be "*more proactive and more flexible in securing compact urban growth through a combination of both facilitating increased densities and building heights, while also being mindful of the quality of development and balancing amenity and environmental considerations*."

3.17 Specifically, SPPR (Specific Planning Policy Requirement) 3A of the Guidelines state that where:

- *an applicant for planning permission sets out how a development proposal complies with a number of criteria (in relation to design, context, visual impact, wind assessment, daylight/sunlight/overshadowing, etc.), and*
- *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.

3.18 Therefore, proposals for taller buildings can no longer be ruled out in principle in the built-up footprint of Cork City.

3.19 Having regard to the design criteria identified in the Guidelines, we note 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.

In terms of radial and orbital connectivity, there are several bus stops located near the site which are within a 15-minute walking distance from the subject site, and which are served by the following routes:

- Route 203 – Lehenaghmore – City Centre – Farranree
- Route 206 – Grange – South Mall
- Route 219 – Munster Technological University Cork (formerly CIT) – Mahon Point Road
- Route 213 – Black Ash – City Centre
- Route 226 – Cork Railway Station – Cork City Bus Station – Cork Airport – Kinsale
- Route 209A – St. Patrick Street – Ballyphehane

There are also multiple proposed Bus Connects routes within the vicinity of the site. The routes include No. 5, 6, 7, 13, 14 and 42X. Routes No. 6 (Frankfield to Mercy Hospital) and 14 (CUH to Little Island) directly serves the proposed development site. Bus frequency in the vicinity of the proposed development will increase when BusConnects is implemented.

- 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.

The Architectural Design Report prepared by BKD Architects sets out how the proposed development has evolved during the design process. This included a critical assessment at an early stage to arrive at a scheme with buildings of a height and massing that are justified in their context, that will have a positive impact on the area, and that responds to the significant and unconstrained potential of a large brownfield

site that is capable of generating its own character as a new high profile, high quality, predominantly residential neighbourhood hub.

The design of the proposed development has also taken into consideration advice from the Planning Authority regarding the provision of a scheme with a range of heights and typologies, including 2no. 4-storey buildings of 2-storey townhouses and 2no. levels of apartments along Pearse Road. The proposed development will also improve the public realm in the vicinity of the site, and improved pedestrian connectivity between Pearse Road and Kinsale Road as well as delivering new public open spaces, and services for the benefit of existing and future inner suburban residents, employees and visitors.

The overall composition and range of heights of between 4-part 8/part 9 storeys in 4no. blocks is considered to be consistent with national and regional planning objectives to achieve compact urban growth through the densification of brownfield sites. The rationale for the height of the proposed development is also derived from the emerging pattern of permitted development in Cork's southern suburbs, in particular at Creamfields site to the south of the proposed development site. The proposed development is closer to Cork City centre than the Creamfields site, but acknowledges the primacy of the Creamfields development, and steps down to the more localised scale in the vicinity of the site, while also referencing the permitted Part 8 5 storey block to the immediate south. As a result, the predominance of the 4-6 storey height, with a central part 8/part 9 storey building, to provide variety in scale, create a sense of place and a localised focal point, is considered appropriate at the location of the proposed development.

Both Blocks 1 & 2 of the proposed development comprise of 4-storeys, with two-storey townhouse apartment units which front onto Pearse Road, and an additional two storeys of traditional apartments. The design of these units has evolved over the design process to ensure that the units maximise on the potential for increased densities and heights while striking an appropriate balance with the existing character of the area. While comprising of 4-storeys, the fourth floor has been stepped back and clad with a PPC aluminium cladding to reduce the visual impact and massing of the units. The form of the units fronting onto Pearse Road in combination with the increased road widths ensure that the units appropriately respond the receiving environment and do not result in an undue negative impact by way of visual amenity.

Similarly, Block 4 which fronts onto Kinsale Road ranges in heights from 4 to 6 storeys. The range in these heights has been developed to respond the existing receiving environment. The 4-storey element on the northern boundary of the site has been chosen to reduce any potential impacts on the existing single storey dwelling located to the north. Increased separation has been provided by way of the location of the vehicular access to the retail car parking.

The 6-storey element of Block 4 has been placed on the entrance point to the site on Kinsale Road, allowing this element to act as a visual landmark/opening into the entrance of the site. The 6th storey has been recessed to reduce the visual massing of the building. Block 4 read in conjunction with the 5 storeys of the adjacent permitted Part 8 residential forms a strong entry point into the scheme.

In relation to the height of Block 3 in particular, which is proposed at part 8/part 9 storeys, it is considered the location of this Block, towards the southern boundary of the site serves as a landmark building and focal point for the scheme itself and for the wider area. It is also justified in architectural and urban design terms regarding the importance of landmark/focal buildings in urban environments and Cork's evolving skyline in this regard, as it will:

- Increase density in an area well-served by public transport, infrastructures and facilities
- Sensitively respond to the existing townscape, landscape character and setting of the city
- Effectively contribute to place-making, an enhanced city image and co-ordinated skyline
- Enhance legibility and local distinctiveness
- Provide a comprehensive development with quality architectural and urban design
- Minimise negative impacts on the immediate environment, its residents and neighbours

Further to this, the increased heights of at part 8/part 9 storeys has been located internal to the site, reduces the overall impact of the increased height on the receiving environment from an overlooking perspective. Additionally, the increased heights when read in combination with Blocks 1,2 and 4 reduces the massing of Block 3 while also creates visual interest in the environs.

In this regard it can be concluded that the proposed development successfully integrates into the receiving environment while also enhancing the environs by way of creating architectural interest and through the provision of new public open spaces and public realm.

- Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

The Landscape and Visual Impact Assessment prepared by CSR concludes that:

- From a landscape perspective,
    - the landscape effect resulting from a Medium landscape sensitivity, and a Medium magnitude of change, is considered to be Moderate. The proposed development will incur change contemplated in the zoning objective and reflected in developments permitted in the vicinity.
    - The proposed apartment buildings, which range from four to nine storeys in height, will incur a change to the character and perception of the local area within which traditional two-storey suburban housing will be punctuated by higher density development.
    - However, the nature of the proposed development is reflective of on-going change in the wider locality, the proximity of the site to the city centre and the zoning of the lands for *Neighbourhood and Local Centre*.
    - The development will deliver a high-quality neighbourhood which is evident in the design characteristics of the proposed buildings and the integration of accessible, up-lifting public realm spaces and green infrastructure.
    - Overall, the landscape effect is considered to be Beneficial.

- From a visual perspective,
    - There are no adverse effects arising from the proposed development on views in the vicinity of the site or on any views included in Cork City Council's View Management Framework including Strategic Linear Views from Tramore Valley Park.
    - Having regard to the verified views included in the photomontages prepared for the proposed development, the majority of the views are within 200m of the subject site, the furthest being 600m away in Tramore Valley Park. The views are concentrated along local streets and thoroughfares and within residential neighbourhoods.
    - The visual effects associated with the proposed development are found to be Moderate for 3no. views, High for 9no. views, and No Change for 1no. view. The quality of visual effects is found to be Neutral for 6 of the views, Beneficial for 6 of the views and No Change for the remaining view. There is a predominance of beneficial and neutral findings arising from the assessment.
    - Careful consideration of the form, height, massing and materiality of the proposed buildings ensures the delivery of a high-quality residential development appropriate to the site and locality, designed in compliance with housing design and planning standards in respect of avoidance of adverse overlooking or overshadowing.
    - Proposed tree planting on the site will have a softening effect along boundaries, through the public realm and public open spaces and at main entrance points to the development from Pearse Road and Kinsale Road. The effect will be enhanced as the planting matures in the medium to long term.

Plate 10: CGI view from Kinsale Road to the internal plaza space with Block 4 fronting Kinsale Road and internal Block 3

- 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.

The proposed development will make a positive contribution to placemaking by introducing a new neighbourhood hub with a new street as well as landscaped, interconnected public open spaces. The variety in height provided throughout the scheme, the variety in materials used and the architectural design of the building facades will create an active street edge and visually interesting streetscape on Pearse Road and Kinsale Road.

The proposed development provides for a pedestrian link via the Pearse Road and Kinsale Road, through three distinct streetscape areas, these comprise of:

- Retail streetscape comprising of outdoor seating areas and streetscape greening located adjacent to the retail uses at Kinsale Road.
- Plaza area, comprising of outdoor seating and dining areas, and planting areas within the heart of the development offering an inclusive urban space with the opportunity for community gatherings and events which will be activated by the proposed café use.
- Terraced entrance providing pedestrian access via the Pearse Road which is comprised of planting, with terraced ramps and steps for seamless integration into the public realm of the development.

Furthermore, the proposed development provides for a new high-quality public open space of 1,389.1m^2, as well as a communal amenity space of 1,507.7m^2. The total open space provision is 2,896.8m^2 (24.02%).

Plate 11: CGI view of the internal public open space and café area

Plate 12: CGI view of Blocks 1 and 2 on Pearse Road and the pedestrian connection into the internal public open space/plaza

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 proposed development delivers high quality modern architectural form at an appropriate scale of development in a highly sustainable location, acting as a catalyst for the further regeneration of the Turner's Cross/ Ballyphehane area.

The development through the addition of 170no. additional residential units, a creche, café and 4no. retail units in combination with the provision of public spaces and new streetscapes will make for a significant contribution in the activation of this site and wider area, providing a catalyst development for the wider vitality of the area, making a positive contribution to the area.

- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab buildings with materials / building fabric well considered.

The proposed development is of high architectural quality, presented as a coherent series of 4no. buildings ranging in height from 4-part 8/part 9 storeys. The proposed materials will be of high-quality finish that not only respects the character of the receiving environment but builds on the local character by taking cues from the local materials and some design details. The proposed materials will provide a sustainable and resilient finish to the new development while creating attractive spaces for new users and public to experience on their journey through and while using this new public realm. A consistent palette will be applied throughout the scheme to the building forms, public realm and green spaces to identify the development as a whole.

Additionally, the variety of heights, ranging from 4 – 9 storeys across the site allows for the creation of visual difference in regard to walls, facades and materials in addition to ensuring no one element or block reads as monolithic. The buildings when read in combination with one another make for a visually appealing development of high architectural quality.

- 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 proposed development will improve the public realm in the vicinity for the benefit of the City, with the setting back of the proposed development from the boundaries with the neighbouring houses; the setting back from Kinsale Road for the proposed future Bus Connects corridor; the setting back on Pearse Road to allow for an own door accessed unit which will help activate Pearse Road and tie in with the receiving environment

To allow for better connectivity across the site and access points into the site, the following was introduced:

- new pedestrian route from Kinsale Road
- new pedestrian access from Pearse Road
- new car and cycle access to the lower ground floor parking under podium to take cars off the site and allow for the separation of cars and pedestrians
- parking access off Kinsale Road for the new retail offering.

The urban design response is set out in detail in the accompanying Architectural Design Report prepared by BKD Architects. Further details on the design of the public streets and spaces are set out in the Landscape Design Rationale prepared by Cunnane Stratton Reynolds which accompanies this application.

Having regard to the Engineering Report prepared by Punch Consulting Engineers, the proposed development is located within Flood Zone C. There is no historic flood events recorded within the proposed development site according to FloodInfo.ie. There is no risk associated with either coastal or fluvial or pluvial flooding of the site as general ground levels for the site are much higher than expected extreme coastal flood levels. The proposed development is at low risk of flooding and the development is deemed appropriate within the proposed site location.

- 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 layout of the proposed development responds to the accessibility of the site and a high degree of permeability is incorporated into the urban design of the scheme. The site layout has been configured to improve the east-west permeability by creating a larger direct pedestrian route. This route connects the retail pedestrian area on Kinsale Road to the pedestrian entry point between Blocks 1 and 2 on Pearse

Road. The location of both Blocks 1 and 2 have evolved over the development of the scheme design to allow for a clear line of sight from Pearse Road and Kinsale Road through the development.

Furthermore, to activate the pedestrian route, a café has been introduced mid-way along the route. This café overlooks the landscaped public area and adds a pleasant touch to the surroundings. Alternate pedestrian access points increase permeability through the site, drawing pedestrians into the generous public open space and plaza areas.

- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

The mix of uses, especially the retail, café, and creche uses, will ensure the proposed development integrates physically and socially into the wider Ballyphehane/Turner's Cross area, and the mix of uses will complement the prevailing commercial uses in the immediate vicinity of the site, and are highly compatible with the primarily residential use of the proposed development. In addition, the neighbouring dwelling choices are primarily traditional three-bedroom semi-detached houses to the north-east, east, north, north-west and west. The proposed development comprises 30% one-bedroom units, 49.4% two-bedroom units and 20.6% three-bed units in a range of apartment and townhouse types, which will add to the choice of dwelling size and type available in the area. The proposed development provides a good range of 1, 2 and 3 bed units which generally align with the dwelling size mix for housing developments in the City suburbs set out in Table 11.8 of the Cork City Development Plan 2022, The provision of 3-bed units in particular is within the range set out in Table 11.8, with the number of 1 and 2 bed units close to the range set out in Table 11.8, but also noting that no studio units or 4-bed/larger units are proposed.

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.

The proposed development has been designed with adequate glazing and adequate ventilation for all dwellings, therefore maximising views and access to natural daylight as far as possible. 49.4% of dwellings benefit from having a dual aspect. The design approach has also ensured that there will be minimal overshadowing.

- 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'.

A Daylight and Sunlight Analysis has been prepared by 3D Design Bureau (3DDB). This concludes that:

- The Vertical Sky Component (VSC) analysis indicates adverse impacts on two properties: the granted Part 8 scheme fronting Kinsale Road and a house at 4 Pearse Road.

- A total of three adversely affected windows/rooms have been identified in the house at 4 Pearse Road, with two of the windows located on the gable wall that directly faces the proposed development. No greater than a moderate adverse impact is predicted.
- Most of the affected windows and rooms are associated with the granted Part 8 apartment. The severity of the impact, on this Part 8 scheme, ranges from *'minor'* to *'major'* (12 no. windows/rooms), depending on the specific façade and floor level. Notably, this building has inherent constraints such as large balconies or windows facing directly onto opposing walls within its own design, which increase its sensitivity to potential impacts from neighbouring developments. Furthermore, supplementary information on the internal layouts of the Part 8 scheme enabled an additional No Sky Line (NSL) assessment. The NSL results are very positive, with only three rooms shown to be adversely affected. All of these rooms are located on the ground floor and are part of single-aspect apartments facing directly toward the proposed development. However, and it is to be noted, that the Part 8 scheme is built right along the boundary of the two sites and it is evident that it would be impacted to a greater degree under a 'Mirror Image' study. Therefore, the setback of Block 4 of the proposed scheme should be taken as a positive.

- Regarding impact to sunlight levels, the Annual and Winter Probable Sunlight Hours (APSH/WPSH) studies show overwhelmingly positive results. No windows were found to be adversely affected in either study. In fact, two rooms/windows of existing surrounding properties, demonstrated a beneficial impact in the APSH results.
- The impact Sun on Ground (SOG) study also yielded positive outcomes. One of the two assessed areas experienced a negligible impact, while the other showed a beneficial impact due to the removal of existing evergreen trees.
- Within the proposed development, the scheme's daylight and sunlight performance was comprehensively assessed. The results demonstrate favourable compliance across all metrics.
    - In the Spatial Daylight Autonomy (SDA) assessment, only two rooms fall below the recommended minimum threshold. This high level of compliance is the result of effective design collaboration and thoughtful architectural solutions, many of which improved conditions in rooms that initially did not meet standards. For those remaining below the recommended SDA, the project architect has provided compensatory design solutions. Additionally, no rooms were found to be affected by tree cover.
    - In terms of Sunlight Exposure (SE), the development achieves an 80% compliance rate across for both tree states. In the opinion of 3DDB, this represents a favourable outcome.
    - Finally, the SOG study confirms that all assessed external areas, as identified by the project architect, including the Communal Amenity Space, Public Open Space, and Crèche Playground receive sunlight levels that meet or exceed compliance standards
- It can be concluded that the scheme is performing favourably from a daylight and sunlight perspective.

Specific Assessments

The Guidelines indicate that in order to support proposals at some or all of these scales, specific assessments may be required, and these may include:

- *Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*

A Wind and Microclimate report has been prepared by B-Fluid Ltd., which accompanies this application. The assessment was undertaken to identify the possible wind patterns around the area proposed, under mean and peak wind conditions typically occurring in Cork, and to assess impacts of the wind on pedestrian levels of comfort/distress. The assessment concludes the development is designed to be a high-quality environment for the scope of use intended of each area/building and does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings.

- *In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision*.

There are no buildings on site that could be used for bats or birds. There are also no large mature or overmature trees with the potential to be of value for roosting bats. The habitats which dominate the proposed development site, i.e., artificial surfaces, are of low value for foraging bats. The ecologist, Greenleaf Ecology, has advised that a bat survey is not required.

- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links*.

The proposed development is not expected to impact telecommunication channels.

- *An assessment that the proposal maintains safe air navigation.*

Having regard to Figure 10.33 of the Cork City Development Plan 2022-2028, the proposed development site is located outside the Public Safety Zones relating to Cork Airport. In relation to Obstacle Limitation Surfaces (OLS), which control the erection of obstacles to aviation that might endanger aircraft in flight, the proposed development, at its maximum height (Block 3 at 37.975m) will not impact the Conical Surface of Cork Airport, as also illustrated in Figure 10.33 of the Cork City Development Plan 2022-2028.

3.20 Having regard to the provisions of the Cork City Development Plan, 2022 (the Plan), and noting:

- Objective 11.1 which advocates sustainable residential development.
- Objectives 2.31, 3.3 and 3.4 which promote company growth and seek to optimise the redevelopment of brownfield lands for principally residential development.

- the ZO 8 Neighbourhood and Local Centres zoning objective,
- the designation of the site as a Neighbourhood Development Site, to which objective 10.100, which also supports compact growth, applies, and
- the target building heights for the South Link Road Corridor in the city's inner suburbs of 3 – 4 storeys,

It is stated that the building height of a development will respond directly to the proposed density of development, the character of an area, as well as block development typologies, site coverage and a range of other factors.

3.21 Section 11.45 – 11.46 of the Plan defines a tall building 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.*
>
> *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'.*

3.22 In assessing development proposals for tall buildings, section 11.53 – 11.60 of the Plan identifies a number of criteria against which an application will assessed, as follows:

Visual Impact

As noted above, the Landscape and Visual Impact Assessment prepared by CSR concludes that:

- From a landscape perspective,
  - the landscape effect resulting from a Medium landscape sensitivity, and a Medium magnitude of change, is considered to be Moderate. The proposed development will incur change contemplated in the zoning objective and reflected in developments permitted in the vicinity.
  - Overall, the landscape effect is considered to be Beneficial.

- From a visual perspective,
  - There are no adverse effects arising from the proposed development on views in the vicinity of the site or on any views included in Cork City Council's View Management Framework including Strategic Linear Views from Tramore Valley Park.
  - The visual effects associated with the proposed development are found to be Moderate for 3no. views, High for 9no. views, and No Change for 1no. view. The quality of visual effects is found to be Neutral for 6 of the views, Beneficial for 6 of the views and No Change for the remaining view. There is a predominance of beneficial and neutral findings arising from the assessment.

In addition, the site is not located within an area of special planning control i.e. Architectural Conservation Areas and is not located adjacent to any Protected Structures or National Inventory of Architectural Heritage structures. As such, no negative impacts arise as a result of the development from a heritage perspective.

Similarly, the development is not located adjacent to the River Lee, as such no negative impact arises in respect of the views and/or riverside amenity.

In relation to the architectural quality and materials, the Architectural Design Statement prepared by BKD Architects details how the proposed materials are to be high quality finish that not only respects the character of the receiving environment but builds on the local character by taking cues from the local materials and some design details. The proposed materials will provide a sustainable and resilient finish to the new development while creating attractive spaces for new residents and the public to experience on their journey through and while using this new public realm.

A Glint and Glare Assessment has been prepared by LINT Data and Geospatial concludes that it is reasonable to determine that there would be no potential for hazardous glint and glare effects to aviation receptors caused by the installation of Solar PV panels at the proposed development.

In this context, it can be concluded that by way of the design, form and materials to be utilised, the proposed development will result in a positive local visual impact on the receiving environment and will not give rise to any negative visual impacts.

Functional Impact

The proposed development is designed to meet all of the technical and regulatory requirements of a building of this nature. Materials have been selected for their appropriateness to the project, longevity and design aesthetic. All emergency access routes are designed to prove safe and legible egress routes from the building for all occupants.

Servicing and maintenance of the proposed development has been considered during the design process. It is not proposed that the site will be taken in charge by Cork City Council, a dedicated management company will be put in place to ensure the site is maintained.

All deliveries to retail units will be via the dedicated retail parking area to minimise disruption to the building users and the public realm.

As detailed in the Traffic and Transportation Assessment prepared by PUNCH Consulting Engineers, the proposed development will have very little impact on the surrounding existing junctions and road network. A significant emphasis on pedestrian and cycle connectivity for the development and its surrounds has been incorporated into the design to assist with connectivity to the Cork City. In terms of connectivity to public transport services, there are several bus stops located near the site which are within a 15-minute walking distance from the subject site, in addition to multiple proposed Bus Connects routes within the

vicinity of the site. The routes include No. 5, 6, 7, 13, 14 and 42X. Routes No. 6 (Frankfield to Mercy Hospital) and 14 (CUH to Little Island) directly serves the proposed development site. Bus frequency in the vicinity of the proposed development will increase when BusConnects is implemented.

A Social and Community Audit has been prepared which identifies that there are sufficient services within the catchment area of the proposed development to serve the development.

The scheme has been designed to provide for a dedicated pedestrian and cyclist public realm through the development to ensure that pedestrian and cyclist safety is maintained at all peak and off peak times. Additionally, all public realm areas are sufficiently overlooked to ensure no isolation occurs.

The proposed development is designed to respond to the receiving urban environment and has been designed to not interfere with aviation, navigation or telecommunications, and avoids any significant detrimental effect on solar energy generation on adjoining buildings.

Environmental Impact and Impacts on Microclimate

1. *Wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces including water spaces around the building.*
2. *Air movement affected by the building should support the effective dispersion of pollutants, but not adversely affect street-level conditions.*
3. *Noise created by air movements around the building, servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.*

A Wind and Microclimate report has been prepared by B-Fluid Ltd. The assessment has been undertaken to identify the possible wind patterns around the area proposed, under mean and peak wind conditions typically occurring in Cork, and also to assess impacts of the wind on pedestrian levels of comfort/distress. The assessment concludes the development is designed to be a high-quality environment for the scope of use intended of each area/building and does not impact or give rise to negative or critical wind speed profiles at the nearby adjacent roads, or nearby buildings.

The proposed development will not give rise to nuisance or contravene any air quality standards.

A Noise Impact Assessment has been prepared by CLV Consulting which concludes ambient noise levels in all of the proposed development internal areas and external amenity areas are expected to be consistent with or below the requirements of the ProPG 2017 and BS 8233 guidance documents.

Cumulative Impacts with other Tall Buildings

1. *The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retrofitting.*

The Landscape Visual Impact Assessment identifies that the proposed development in combination with other permitted tall buildings within the immediate environs, concluding that the proposed development is reflective of on-going change in the wider locality, the proximity of the site to the city centre. The LVIA finds that the proposed development, in isolation or in combination does not impact on designated views in the Cork City Development Plan. The cumulative photomontages provide insight into the nature of change arising in the locality in terms of housing scale and density, reflecting the proximity of the area to the city centre.

As detailed previously, the proposed development has been designed to ensure that the development does not give rise to any functional impacts by way of services; traffic or public realm issues as a result of the development in isolation or in combination with other planned or permitted tall buildings. In this regard, the Traffic and Transportation Assessment prepared has included the impacts of traffic generated from the permitted development at the Former CMP Dairies Site known as the Creamfields SHD.

The Wind and Microclimate report has been prepared by B-Fluid Ltd. does not identify any cumulative impact arising from the proposed development in combination with any permitted or planned developments within the immediate environs.

Public Access

1. *Consideration should be given to incorporating publicly-accessible areas into tall buildings where appropriate. The incorporation of publicly accessible areas in tall buildings should be considered where appropriate particularly in more prominent tall buildings, where they should normally be located at the top of the building to afford wider views across Cork. people living or working in the building.*

Throughout the proposed development publicly accessible elements are provided by way of the public realm allowing through access for pedestrians and cyclists, the provision of a public green space and a café and retail uses on the site.

No public access will be provided to the upper floors of the buildings; this is to ensure that residential areas are private and secure and to ensure that the residential amenity and security of all future residents is not adversely affected.

Application Process

1. *Proposals for individual tall buildings must be supported by a strategic design process for the relevant character area to provide the basis for a coherent design strategy for the tall building. Detailed design for a tall building will respond to the principles established.*
2. *Cork City Council is committed to achieving excellence in the design of all developments and exemplary standards in the design of tall buildings given their visual prominence and civic and cityscape status. Cork City Council may utilise a Design Review process for the design of tall buildings and major developments.*

The design of proposed development has been guided by a coherent design strategy, that is set out in detail in the Design Statement prepared by BKD Architects. The design rational has been guided by the existing context of the site, ensuring to address the receiving environment by way of the design. The design has been further guided by the design principles of provided dedicated pedestrian public realms, removing vehicular traffic from the site's main thoroughfares. The design strategy is further detailed in the Design Statement which accompanies this application.

3.23 The proposed development represents a high-quality development in regard to architectural design and form, incorporating high quality materials, creating high quality spaces through the provision of residential accommodation, communal and public open spaces in addition to retail and café uses on site.

4.0 CONCLUSION

4.1 The Building Heights Statement establishes that the proposed development, the Kinsale Road LRD at a proposed height ranging from 4 to 9-storeys across four blocks is appropriate. It sets out the rationale for the proposed tall building and provides an assessment against tall building criteria set out in both the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and the Cork City Development Plan 2022 - 2028.

4.2 The tall building rationale and assessment establishes the site of the proposed development is located within an area which benefits from high levels of existing public transport connectivity in addition to being located along the proposed BusConnects route. The development will contribute to delivering compact urban growth in an area well served by public transport, and by this help deliver the growth objectives of the Cork Development Plan as well as the National Policy Guidance.

4.3 That the site is zoned as ZO 8 Neighbourhood and Local Centre in the Plan, and is also a designated Neighbourhood Development Site, which envisages compact and sustainable development, particularly for residential use, further confirms its suitability for the proposed development of the nature and scale proposed.

4.4 In the context of objective 10.100 in relation to Neighbourhood Development Sites, the proposed development will provide a mixed use, primarily residential scheme which has placed public realm as a priority, creating a new urban neighbourhood in a compact manner. In addition to the proposed 170no. residential units, the proposed development also provides a mix of appropriately scaled uses which will contribute to the existing local community, include convenience retail, retail services and neighbourhood-scale employment opportunities.

4.5 The proposed Large Scale Residential Development is situation in an area with an emerging context of heights ranging from five to 15 storeys. The proposed heights ranging from four to nine makes for a positive intervention on the site, increasing heights and densities in line with National Policies while achieving an appropriate design response which responds to the receiving environment.

4.6 As such, the proposed development successfully responds to the tall building criteria set out in both the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and the Cork City Development Plan 2022 – 2028 and provides for heights which will successfully and positively contribute to the creation of a compact Cork City.