



COAKLEY O'NEILL  
town planning

# Statement of Response to Council Opinion

Kinsale Road LRD

Prepared in June 2025 on behalf of  
**BML Duffy Property Group Limited**

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## 1.0 INTRODUCTION

- 1.1 BML Duffy Property Group Limited intend to seek permission for a Large-Scale Residential Development (LRD), as described below at the site of the Former Vita Cortex Facility at the Kinsale Road and Pearse Road, Cork.
- 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 Following the LRD Opinion meeting on the 20<sup>th</sup> November 2024, the Planning Authority issued its Opinion on the 17<sup>th</sup> December 2024, which stated that it was of the opinion that the documentation submitted with the consultation request under section 32B of the Planning and Development Act 2000 (as amended), required further consideration and amendment to constitute a reasonable basis on which to make an application for permission for the proposed LRD. The following response to the items identified, which should be read in conjunction with the plans and particulars submitted with the planning application, has been prepared by the applicants' design team:
  - Coakley O'Neill Town Planning Ltd.
  - BKD Architects
  - PUNCH Consulting Engineers
  - Cunnane Stratton Reynolds
  - Greenleaf Ecology
  - B-Fluid Ltd
  - Byrne Environmental
  - Lint Data and Geospatial
  - 3D Design Bureau
  - RSK Ireland
  - CLV Consulting
- 1.4 For clarity, the applicants' response to each of the items raised is set out in the order that they appear in the Planning Authority's Opinion. Each item is outlined in *italics*, followed by the Applicants' response to same.

## 2.0 RESPONSE TO OPINION ITEMS

### Item 1: Density and Height

*The targets for density and building heights are set out in Table 11.2 of Chapter 11 of Volume 1 Written Statement in Volume 2 Mapped Objectives in the Cork City Development Plan 2022-2028. The subject site is located within the inner Urban Suburbs (No. 5 South Link Road Corridor). For this area, the target dwellings per hectare (dph) is between 50-100. The target for building heights ranges from 2-4 storeys. As proposed development significantly exceeds the upper limit of these targets in terms of density and building height, at application stage, as part of an updated Planning Statement/Statement of Consistency, the applicant is required to provide robust justification for the density and building heights of the proposed development, having regard to local, regional and national planning policy and the relevant Ministerial Guidelines. In order to address this, a revised design of the proposed development may be required.*

#### Response

- 2.1 The proposed development comprises of 4no. blocks ranging in height from 4 to part 8/part 9 storeys. The net residential density is 140 dwellings per hectare (dph). It is noted that within the Cork City Development Plan the site is identified as being within the Inner Urban Suburbs and as the South Link Road Corridor where a height target of 3-4 storeys should be achieved. Table 11.2 further identifies a residential density target of 50-100 dph in this area.
- 2.2 The density of the proposed development has been guided by the Sustainable Residential Development and Compact Settlements Guidelines (2024). The Guidelines constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended). Section 28 provides that planning authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, when considering a development proposal in accordance with Section 34 of the Act.
- 2.3 Section 3.3.1 of the Guidelines identified that in the five cities of Dublin, Cork, Limerick, Galway and Waterford the strategy as set out in the National Planning Framework is to support the consolidation and intensification of development within the existing built-up footprint of the cities and suburbs. The Guidelines identify a number of key priorities for the development of these cities which includes to:
- 'deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the city and suburbs area or metropolitan towns'.*
- 2.4 Table 3.1 identifies that in City Urban Neighbourhoods it is a policy objective that residential densities in the range of 50-250 dph shall generally be applied. Such Urban Neighbourhoods can be characterised by:
- 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 locations*

- iii. *town centres designated in a statutory development plan*
  - 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*
- 2.5 Owing to the site's geographical location within the existing built up area of Ballyphehane/Turners Cross, the site is considered to be a City Urban Neighbourhood – located in a compact medium density residential neighbourhood of the City that has evolved over time to include a greater range of land uses, including retail park types uses at Turner's Cross Retail Park to the south. The site benefits from existing and proposed sustainable transportation options and is considered to be highly accessible and is a zoned neighbourhood/local centre and Neighbourhood Development Site.
- 2.6 The net density of 140 units per hectare has been arrived at with consideration of Section 3.4 of the Guidelines which details how densities should be considered and refined based on a site's centrality, accessibility to services and consideration of the existing character, amenity and natural environment.
- 2.7 As detailed within the accompanying documentation, the site of the proposed development is located on a highly accessible suburban neighbourhood centre site, identified in the Cork City Development Plan for the development of a compact mixed use, primarily residential neighbourhood.
- 2.8 In this context and having regard to the criteria set out in the Sustainable Residential Development and Compact Settlements Guidelines, the density proposed is appropriate given the context of the proposed development, within the existing built of footprint of Cork City, located in a medium density residential area which has evolved to cater for a mix of uses. The proposed density strikes an appropriate balance between achieving the National Planning Frameworks objectives of securing compact development at increased densities on infill and brownfield sites while also adapting to and responding to the existing receiving environment.
- 2.9 In relation to the proposed heights, a Building Height Rationale Report has been prepared by Coakley O'Neill Town Planning Ltd outlining how the proposed development complies and corresponds with the development management principles set out in the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and the design criteria set out in the Development Management Standards of the Cork City Development Plan for Tall Buildings. This Report concludes that 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 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. The proposed building heights adequacy responds to both National and local policies and represents a high-quality development which will positively contribute to the Cork City environs.
- 2.10 In this regard, the proposed development comprising of 4no. blocks ranging in height from 4 to part 8/part 9 storeys, with a net residential density of 140no. dwellings per hectare (dph) is in keeping with the policies

and objectives of national, regional and local planning policy and the relevant Ministerial Guidelines in regard to building heights and densities.

## Item 2: Block 3 – Height and Visual Impact

*At application stage, the applicant shall set out the rationale/justification of the development in terms of the building height of proposed Block 3 and the potential visual impact on the local area. In this regard, note that 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. It should 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). In order to address this matter, a revised design of the proposed development may be required.*

### Response

- 2.11 In regard to the proposed heights, a Building Heights Rationale Report has been undertaken outlining how the proposed development complies and corresponds with the development management principles set out in the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and the design criteria set out in the Development Management Standards of the Cork City Development Plan for Tall Buildings.
- 2.12 Block 3 of the proposed development, by way of its location within the site itself reduces the visual impact of the part 8/9 storey unit. 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. 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. The proposed Block 3 will positively contribute to visual amenity of the area.
- 2.13 Further to this, a Landscape Visual Impact Appraisal (LVIA) has been prepared by CSR and informed by a desktop study and a survey of the site and receiving environment in September 2024. The appraisal is in accordance with the best practice methodology.
- 2.14 In relation to a potential visual impact on the local area, the LVIA assess the potential developments influence from 13no. localised viewpoints, ranging from distances of 30m – 600m. The LVIA concludes that the proposed development in a number of cases will represent no change and in 70% of the views assessed, the visual effect is identified as high, with 66% of these being considered beneficial and 34% considered to be neutral.
- 2.15 The beneficial effects relate to locations where the development is found to make distinctly positive contributions to the setting, providing active street frontage, passive supervision and transformation of the former industrial site to a functional residential neighbourhood. The neutral effects relate to views in which parts of the development are visible but where the positive aspects described above are not necessarily evident due to the angle of view or limitations imposed by existing buildings in the views.

- 2.16 For further detail in relation to the beneficial impact the proposed development will have on the local area, please refer to the LVIA prepared by CSR which accompanies this application.
- 2.17 It can be concluded by way of the findings of the Building Height Rationale and Landscape Visual Impact Appraisal, that the proposed development in terms of height is in keeping with the guidance of the Cork City Development Plan and the Urban Development and Building Heights Guidelines for Planning Authorities.

### **LRD Opinion Item 3: Visual Impact Assessment**

*At application stage, the applicant shall submit a full Visual Impact Assessment to include the appropriate catchment area of existing and proposed views and an accompanying written assessment setting out the methodology, findings and conclusions of the assessment. Further consideration of the visual impact of the scheme shall include an assessment of whether the development would be excessive in height/visually incongruent when viewed from close range views (from viewing receptors i.e. passing pedestrians, cyclists and vehicle users) along Kinsale Road (north and south approaches) and Pearse Road (east and west approaches) and the potential impact on the Strategic Linear View of the designated Local Landmark Buildings of the Christ the King Church, Turner's Cross to the north. In this regard, note Development Management guidance under Paragraphs 11.16 and 11.18 of the Cork City Development Plan 2022-2028. A revised design strategy of the proposed development may be required.*

### **Response**

- 2.18 As outlined previously, Landscape Visual Impact Appraisal (LVIA) has been prepared by CSR and informed by a desktop study and a survey of the site and receiving environment in September 2024. The appraisal is in accordance with the best practice methodology.
- 2.19 Further to this, Verified Photomontages have been prepared by 3D Design Bureau which accompany this application, and have been used to assess the potential effect of the proposed development from a visual impact in the LVIA.
- 2.20 In regard to a potential visual impact on the local area, the LVIA assess the potential developments influence from 13no. localised viewpoints, ranging from distances of 30m – 600m. The locations of these views are indicated in figure 1.
- 2.21 The LVIA concludes that the proposed development in a number of cases will represent no change and in 70% of the views assessed, the visual effect is identified as high, with 66% of these being considered beneficial and 34% considered to be neutral.
- 2.22 In all views identified from the Kinsale Road and Pearse Road, all impacts in the short to medium and long term are considered to be high with a beneficial impact. It is concluded that from viewpoint 1, the Kinsale Road and Pearse Road junction that the impact is considered to be moderate with an overall neutral impact.



- 2.23 In regard to the visual impact at the Kinsale Road and Pearse Road junction, the LVIA identifies that this viewpoint is located on a busy route to and from the city – viewers will primarily be local residents and road users. It is identified that the development will be visible to the rear of existing dwellings at the junction however this is considered not to be dominant and will result in more definition of the street and provide passive supervision for pedestrians and cyclists in this area.
- 2.24 Overall, the LVIA identifies that at a local level, the development will make distinctly positive contributions to the setting, providing active street frontage, passive supervision and transformation of the former industrial site to a functional residential neighbourhood. The neutral effects relate to views in which parts of the development are visible but where the positive aspects described above are not necessarily evident due to the angle of view or limitations imposed by existing buildings in the views.



**Figure 1 LVIA Viewpoint Location Map.**

- 2.25 As identified in the Cork City Development Plan, the view of Christ the Kings Church, Turners Cross from Tramore Valley Park is identified as a Strategic Linear View. This viewpoint has been illustrated in viewpoint 9 of the verified photomontages prepared by 3D Design Bureau and assessed in the LVIA prepared by CSR.
- 2.26 The LVIA identifies that the proposed development will be visible from this location in the middle distance, however it is considered to be a low magnitude of change. The development will be visible but not intrusive in the context of the panoramic views from the Tramore Valley Park and will not adversely impact on the



Strategic Linear Views from this location as identified in the Plan. This view is illustrated in the photomontages prepared by 3D Design Bureau.

- 2.27 As such, it can be concluded that the proposed development will not be excessive in height/visually incongruent when viewed from close range views or the strategic linear views identified in the Plan. The proposed development will make for a positive contribution to an evolving urban landscape.

#### LRD Opinion Item 4: Housing Mix

*Further consideration and amendments to the housing mix for the residential element of the proposed development is required, having regard to Objective 11.2 and Table 11.8 of the Cork City Development Plan 2022-2028. If the proposed housing mix is not aligned with the housing mix targets in Table 11.2, the applicant shall provide a separate Housing Mix report setting out a justification on the basis of market evidence that the demand/ need for specific dwelling size is lower than the target. Details of the intended occupation/tenure, if different from the standard private apartment supply should be clearly clarified in the housing mix report.*

#### Response

- 2.28 The proposed housing mix has been considered and has been amended with regard to Objective 11.2 and Table 11.8 of the Cork City Development Plan 2022-2028. The housing mix now proposed, as illustrated below in Table 1., is 30% 1-bed; 49.4% 2-bed and 20.6% 3-bed dwellings.

Unit Type	Total	Percentage	Development Plan Range
1-bed	51	30%	15%-25%
2 Bed	84	49.4%	30%-40%
3 Bed	35	20.6%	25%-35%
Total	170	100%	-

**Table 1 Proposed Housing Mix and Cork City Development Plan Housing Mix Targets.**

- 2.29 As illustrated above, the proposed housing mix is considered to be largely in line with the Housing Mix targets identified in the Cork City Development Plan. While the provision of 3-bed units is 4.4% below the target identified in the Plan, this mix has taken account of the established and emerging housing mix in the area. Noting, the adjacent permitted Part 8 scheme which provides 61.5% 1-bed units and 38.5% 2-bed units, which was considered an acceptable mix having regard to the prevailing housing mix in the area, to deliver a balanced community and a range of housing options to meet all needs.
- 2.30 However, for further clarity, Statement of Housing Mix has been prepared by Coakley O'Neill Town Planning Ltd and accompanies this application. The Statement of Housing Mix is accompanied in Appendix 1 by a Market Advisory Report prepared by Sherry FitzGerald.
- 2.31 The Statement of Housing Mix concludes that with regard to the existing housing stock in the immediate area, a population uplift and a consequential increase in the requirement for new homes, including apartments and the well-documented demand versus supply conundrum, the housing mix proposed for

the Kinsale Road LRD is generally aligned with the requirements of Table 11.8 of the Plan as it applies to Cork City Suburbs and will positively contribute to future communities of the Cork City environs.

### **LRD Opinion Item 5: Impact on Residential Amenity**

*The applicant shall provide a specific planning assessment of how the proposed development will impact on the residential amenity of the local area surrounding the site and in particular the existing neighbouring residential dwellings along Pearse Road and Kinsale Road. All potential impacts such as impacts on amenity, impacts on privacy/overlooking, impacts on daylight supply/overshadowing, potential overbearance, impacts at both construction and operational phases of the proposed development shall be set out for consideration by the Planning Authority. To minimise and/or alleviate any negative impacts on local residential amenity, revisions to the proposed development may be required.*

### **Response**

- 2.32 A Specific Planning Assessment on Residential Amenity has been prepared by Coakley O'Neill Town Planning Ltd and accompanies this application.
- 2.33 The reports assessing the potential for the proposed development to impact on the residential amenity of the local area surrounding the site and in particular the existing neighbouring residential dwellings along Pearse Road and Kinsale Road. The assessment considers the potential impacts on residential amenity in regard to:
- Design;
  - Landscape and visual impact;
  - Daylight, Sunlight and Overshadowing
  - Noise Assessment;
  - Microclimate;
  - Traffic;
  - Construction; and
  - Operations.
- 2.34 The assessment concludes that the only potential impacts on residential amenity arising as a result of the proposed development, which are considered to be moderate are as follows:
- in respect of Daylight and Sunlight impacts on two properties are identified:
    - no. 4 Pearse Road, 3no. windows/rooms are predicted to be adversely affected, of which 2no. windows which are located on the gable wall that directly face the proposed development, are predicted to experience a Moderate Adverse impact, and 2no. windows in a ground floor room are predicted to experience a Minor Adverse impact.
    - the granted Part 8 scheme fronting Kinsale Road, although it is noted that the Part 8 scheme 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. The setback of Block 4 of the proposed scheme will assist in mitigating this impact.
- a slight to moderate noise impact on 4 Pearse Road is predicted during some construction phases when they occur in close proximity. Construction activities in close proximity to the 4 Pearse Road dwelling should therefore be managed / coordinated with local residents to minimise their potential noise impact.
- 2.35 As a brownfield/infill urban site with a zoning objective for the development of a new mixed-use neighbourhood centre to provide predominantly residential uses – such minor and moderate impacts as identified, are considered to be appropriate.
- 2.36 In all other areas, the assessment concludes that no significant impacts on residential amenities in the vicinity of the proposed development site are expected. The proposed development will have a predominantly beneficial impact on the immediate and wider area.

### **LRD Opinion Item 6: Land Contamination**

*Further detail required in relation to the contaminated land element of this project – no information has been provided to date. It is noted remediation works are ongoing.*

- a) *Due to the former industrial use of the area, there is a possibility that the site is contaminated. It shall be required prior to the submission of the planning application that developer engages the services of a recognised environmental consultant with experience in the field of Land contamination to:*
- i. *Carry out a site investigation from a land contamination view point*
  - ii. *Carry out a risk assessment*
  - iii. *Recommend remedial measures; and*
  - iv. *Prepare a report containing all of the above in the standard format. This report shall be submitted to the local authority for its written approval before commencement of the development.*

### **Response**

- 2.37 In April 2024 planning permission was sought for the remediation of the site of the proposed development, under Application REF 24/42868. On the 24<sup>th</sup> of September 2024, permission was granted for the remediation of the site, which involved a combination of excavation and off-site disposal of impacted soils, pump and treatment of groundwater, and importation of stone/soil for backfilling.
- 2.38 Remediation work granted under Application Reg. Ref. 24/42868 commenced in late 2024 and were completed on the 28<sup>th</sup> of February 2025. A Remediation Status Report has been prepared by RSK and accompanies this application.
- 2.39 The Remediation Status Report details the current status of remediation works and the stages which have been carried out to date in accordance with 'Guidance on the Management of Contaminated Land and Groundwater at EPA Licensed Sites' (Environmental Protection Agency, Ireland, 2013). Currently, the Site is

at Stage 3 of the EPA guidance workflow – the verification process is currently underway which involves the collection of groundwater samples from boreholes collected across 2 rounds spaced 6 months apart. It is expected the verification process will be completed towards the end of September 2025. Once the verification process is complete a report will be submitted to the EPA to support an application for surrender of the IPPC licence.

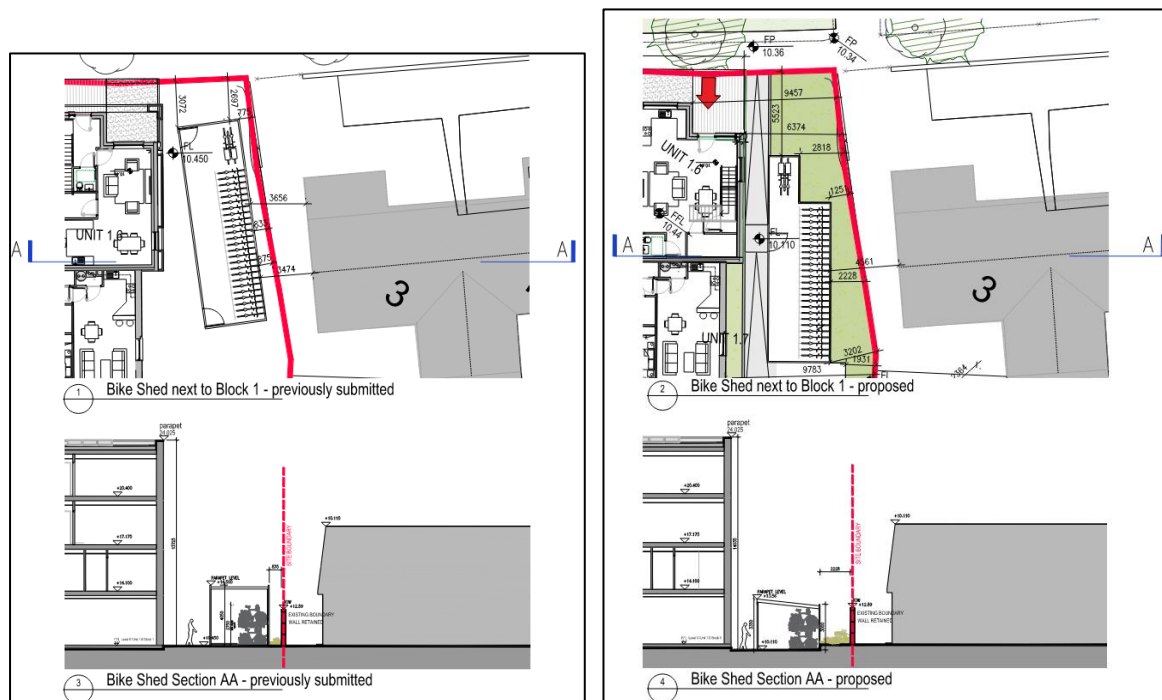
- 2.40 Please refer to the Remediation Status Report has been prepared by RSK and accompanies this application for further details in regard to site contamination, site investigation and remedial measures undertaken.
- 2.41 Should the Planning Authority grant permission for the proposed development, the applicant is happy to submit a further report following the completion of verification process to show that the site has been adequately remediated to safely accommodate the proposed development.

#### **Detailed Item 1 – Bike Shed**

*The applicant is requested reconsider the configuration of the bike shed on the northeast corner of the site (Block 1), there are concerns regarding overbearance and overshadowing of the neighbouring dwelling to the northeast given its height and proximity to the boundary. In addition, the application is requested to provide a section showing the relation between Block 1 and the neighbouring dwelling to the northeast.*

#### **Response**

- 2.42 The location and configuration of the bike shed adjacent to Block 1 on the Pearse Road has been revised to address the comments of the Planning Authority.
- 2.43 The revised proposal shows the bike shed with a floor level 220mm lower than Pearse Road, accessed via a ramp, at a level of 10.11OD. The plan has been adjusted to set the bike store back from the boundary as much as possible, 2800mm from the boundary as seen from Pearse Road and 1250mm at the closest point.
- 2.44 The roof of the store is now pitched toward the boundary to reduce the impact on the adjacent dwelling and updates to the design of the bins store have also allowed the overall height of the bike shed to reduce by 1000mm from the previously submitted drawings. These design changes significantly reduces the impact on the adjacent dwelling.
- 2.45 The relationship between the bike shed and the neighbouring dwelling is shown in Drawing No. KRC-BKD-ZZ-ZZ-DR-A-1210\_A which illustrates the previously submitted and current proposal for bike/bin stores at Pearse Road.
- 2.46 Please also refer to drawing KRC-BKD-ZZ-ZZ-DR-A-1200\_G for details of revised bikes and bin stores.



**Figure 2 Bike Shed Details.**

### Detailed Item 2 - Overlooking

*The applicant is requested to provide further consideration to ensure that there is no potential for overlooking impacts on existing neighbouring residential properties. Measures such as the use of privacy boxes (or any mitigation measure deemed effective) on upper floor windows of the northeastern elevation of Block 1, Pearse Road, and Block 4, Kinsale Road or any other upper floor window that may amount to potential overlooking of nearby residential dwellings.*

### Response

- 2.47 The relationship between the proposed development and the existing residential dwellings adjacent to the development has been a key consideration throughout the design process of the development.
- 2.48 In order to ensure that no undue overlooking or loss of privacy occurs for existing residents adjacent to the proposed development, it is proposed that the windows on the northeastern elevation of Block 01 on Pearse Road, from level 02 -level 04 are proposed are to be of an opacified glazing to avoid any issue with overlooking on the neighbouring residential properties. This is illustrated in Drawing No. KRC-BKD-01-ZZ-DR-A-2000\_G prepared by BKD Architects.
- 2.49 Additionally, the windows from level 01-level 04 on the North elevation of Block 4 are also proposed to be of an opacified glazing to avoid any potential overlooking with the neighbouring residential properties. This is illustrated in Drawing No. KRC-BKD-04-ZZ-DR-A-2000\_F prepared by BKD Architects.
- 2.50 Owing to these measures it can be concluded that there is no potential for overlooking impacts on existing

neighbouring residential properties.

### Detailed Item 3 – Sunlight and Daylight Access Analysis

*The applicant is requested to submit Sunlight and Daylight Access Analysis indicating compliance with the BRE guidelines, BRE guide 'Site Layout Planning for Daylight and Sunlight' (2<sup>nd</sup> Edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting', having regard to the worst-case scenario for the ground floor apartments inter alia, rooms with no direct sunlight or limited access to sunlight.*

#### Response

- 2.51 A Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau and accompanies this submission. The Daylight and Sunlight Assessment has assessed the proposed development on a performance basis as well as an impact assessment, this assessment has been undertaken in accordance with the BRE guidelines, 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'.
- 2.52 In regard to Spatial Daylight Autonomy, the assessment reviewed all habitable rooms within the residential portion of the proposed development both with and without trees.
- 2.53 The assessment, in accordance with BR 209 finds that a total of 492 of the 494 habitable rooms proposed meets or exceeds the appropriate target values. This gives a circa compliance rate of above 99%. For a development of this scale, this represents an excellent level of compliance.
- 2.54 The assessment of Spatial Daylight Autonomy, in accordance with I.S. EN 17037, when assessed with tree finds a compliance of 88% and 90% when trees are not considered. In cases where rooms comply with the criteria of BR 209 but do not meet the criteria of I.S. EN 17037, it is the recommendation of 3D Design Bureau that these rooms will appear adequately daylit. This recommendation is based on the fact that BR 209 provides room-specific criteria, unlike I.S. EN 17037. BR 209 considers the varying daylight requirements for different room types, which I.S. EN 17037 does not account for.
- 2.55 Further to this, the assessment finds that the proposed development is in keeping with Section 6.7 of the Sustainable Urban Housing: Design Standards for New Apartments in relation to standards for internal daylighting.
- 2.56 The overall high SDA compliance has been achieved through careful design collaboration, which led to the optimisation of specific units to achieve higher SDA values. Actions taken included widening and repositioning windows, removing façade elements that obstructed daylight and sunlight, such as external balcony framing, and implementing substantial internal layout changes.
- 2.57 Further to this, a sunlight exposure assessment has been carried out on all habitable rooms within the residential portion of the proposed development. This assessment finds that of the 170no. proposed residential units; with all trees: 93 no. units are considered high, 19 no. medium, 24 no. have reached the

minimum recommendation, and 34 no. below minimum. Without deciduous trees: 94 no. units are considered high, 18 no. medium, 24 no. have reached the minimum recommendation and 34 no. below minimum. Illustrating that regardless of the effect of trees, 80% of the assessed units meet the Sunlight Exposure. For a unit to be compliant under BR 209, only one habitable room within the unit needs to meet the guideline values.

- 2.58 For the proposed development, most of the units falling below the recommended minimum are single-aspect, north-facing units, with a small number of dual-aspect units included. Through collaboration with the project architects design solutions have been implemented to ensure adequate sunlight access where possible. The tallest proposed building (Block 3) is particularly noteworthy, as it has no apartments below the recommended minimum, which is a very positive outcome in terms of compliance.
- 2.59 The Daylight and Sunlight Assessment Report concludes that the scheme is performing favourably from a daylight and sunlight perspective.

#### **Detailed Item 4 – Daylight, Sunlight and Overshadow (DSO) analysis**

*The applicant is requested to submit a Daylight, Sunlight and Overshadow (DSO) analysis to assess the impact of the proposed development on the amenity areas of neighbouring residential properties where applicable.*

#### **Response**

- 2.60 A Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau and accompanies this submission. As part of this assessment and Impact Assessment was undertaken to ascertain any potential levels of effect that the proposed development would have on the surrounding existing environment and/or properties.
- 2.61 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.
- 2.62 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.



- 2.63 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.
- 2.64 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.

#### **Detailed Item 5 – Area Standards**

*The applicant is requested to clearly set out how each of the proposed residential units on site would comply with all of the required area and standards that are set out in the Sustainable Urban Housing: Design Standards for New Apartment Guidelines for Planning Authorities December 2022 (updated) and Quality Housing for Sustainable Communities 2007.*

#### **Response**

- 2.65 A Housing Quality Assessment has been prepared by BKD Architects and accompanies this application.
- 2.66 The Housing Quality Assessment details the floor areas of all units proposed with all minimum requirements for floor areas and standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2022 and the Quality Housing for Sustainable Communities 2007.
- 2.67 The Housing Quality Assessment also details that the proposed development provides for sufficient private and communal open space in accordance with the standards set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2022.
- 2.68 In this regard, the Housing Quality Assessment illustrates that the proposed development represents a high-quality development which will provide for a high standard of living for all future residents.

#### **Detailed Item 6 – Boundary Treatment**

*The applicant is requested to provide details of the proposed boundary treatment for the entirety of the site to include proposed materials, heights and planting where applicable.*

#### **Response**

- 2.69 A Landscape Design Rationale Report and Landscape Masterplan Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101 and Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/201 have been prepared by CSR and accompanies this application.

2.70 The Landscape Design Rationale Report and Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/201 illustrate the proposed boundary treatments for the site which include:

- Concrete Post and Panel Fence on North/Northeast Boundary
- Brick Wall at North East Boundary
- Concrete Wall at South and Southeast Boundary
- 2.4m Ibox Security Fence at South/Southwest Boundary.

2.71 A 2.4m Ibox Security is proposed at the South/Southwest boundary to ensure the continued security of the adjacent Virgin Media Park.

#### **Detailed Item 7 – External Finishes**

*The applicant is requested to provide updated details of all external finishes to include materials and colours schemes.*

#### **Response**

2.72 The Architectural Design Statement prepared by BKD Architects sets out the details of all external finishes including materials and colours in addition to the rationale for each of these finishes.

2.73 It is the design intention to ensure all finishes and materials are high quality and respects the character of the receiving environment but builds on the local character by taking cues from the local materials and some design details.

2.74 The proposed finishes as set out in section 5.3 of the Architectural Design Statement are as follows:

- Warm mid-grey brick with cream mortar;
- Cream render finish;
- Light warm grey render finish;
- Mid grey aluminium cladding;
- Dark uPVC windows and Doors;
- Moca cream limestone;
- Mid brown-bronze aluminium cladding;
- Mid brown-bronze PPC perforated metal cladding;

2.75 These finishes are illustrated in the Elevations Prepared by BKD Architects in Drawings Nos. KRC-BKD-01-ZZ-DR-A-2000, KRC-BKD-02-ZZ-DR-A-2000, KRC-BKD-03-ZZ-DR-A-2000, KRC-BKD-04-ZZ-DR-A-2000 and KRC-BKD-04-ZZ-DR-A-2001.

#### **Detailed Item 8 - Signage**

*The applicant is requested to provide details of the proposed signage for all commercial elements of the scheme.*

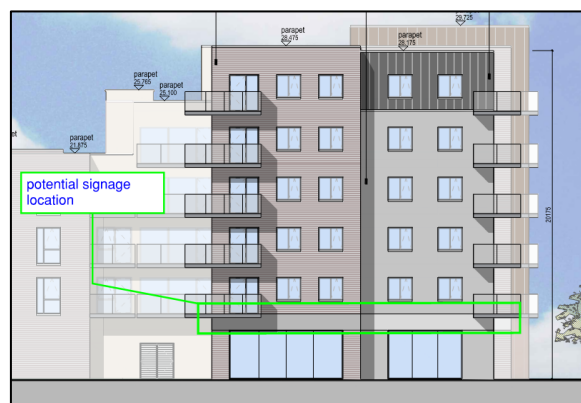
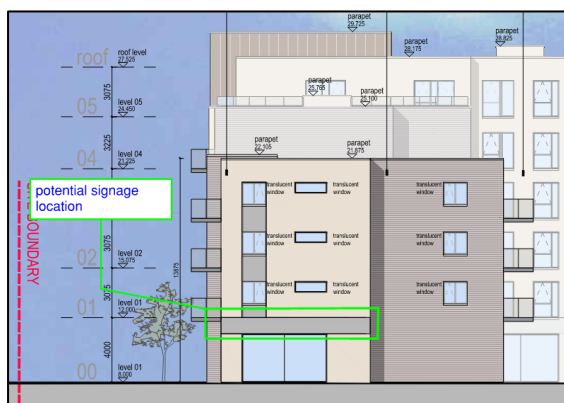
*This should include: A cross section of proposed signage, the size (length, depth, width), font and proposed material and finishes, details and dimensions of all other apparatus required to illuminate and fix the signage to the building façade, details of the level of illumination proposed.*

### Response

- 2.76 No end users have been identified in respect of the end users for all commercial elements of the proposed development. As a result, the requested details in relation to the signage for these areas cannot be provided.
- 2.77 Potential signage areas have been identified at ground floor level in respect of the proposed retail units, as indicated below. It is proposed that the details of all signs are to be submitted to the Planning Authority by way of compliance for agreement prior to the occupation of these units.
- 2.78 The signage areas are illustrated below and in Drawing No. KRC-BKD-04-ZZ-DR-A-2000\_F prepared by BKD Architects.



**Figure 3 Potential Signage Locations Block 4.**



**Figure 4 Potential Signage Locations Block 4.**

#### **Detailed Item 9 – EIA and AA**

*The applicant is requested to submit screening reports for Environmental Impact Assessment & Appropriate Assessment.*

#### **Response**

- 2.79 Please see enclosed Screening Reports for EIA and AA prepared by Greenleaf Ecology. Both EIA and AA are screened out.

#### **Detailed Item 10 – Housing Tenure**

*The applicant is requested to clarify the housing tenure for the proposed scheme.*

#### **Response**

- 2.80 The proposed scheme comprises of a private apartment development, with the applicable Part V provision. The development will be managed by a private management company to be established.

#### **Detailed Item 11 – Elevational Treatment**

*There are concerns regarding the elevational treatment and articulation of materials along Pearse Road with specific reference to the protruding fibre cement/ stone cladding elements that result in an over emphasis on the verticality and scale of Block 1 and 2. The applicant is requested to reconsider this approach and update plans accordingly.*

#### **Response**

- 2.81 The elevations of Block 1 & 2 along Pearse Road have been amended along with the internal configuration of some of the units in response to the comments of the Planning Authority.

- 2.82 The revised elevations while retaining the top floor setback and three storey shoulder, have been simplified with many of the recessed elements and fibre cement/stone clad 'framing' element removed. A simpler brick palette is proposed which helps to ground the block and ties in more with the receiving environment.
- 2.83 The overall redesign and change of materials put less emphasis on the verticality of Blocks 1 & 2. This is illustrated in Figure 5 below.
- 2.84 Please refer to Drawings Nos. KRC-BKD-01-ZZ-DR-A-2000\_G, KRC-BKD-02-ZZ-DR-A-2000\_E and KRC-BKD-ZZ-ZZ-DR-A-2030\_F prepared by BKD Architects for further details.



**Figure 5 Proposed Elevational Treatment of Blocks 1 & 2.**

### Detailed Item 12 – Scale and Material

*Regarding Block 4 at the junction of Kinsale Rd where it meets the pedestrian street. There is a further emphasis in the height of the corner block. Furthermore, the aluminium cladding, appears at odds with the predominantly brick and render finishes elsewhere. Similar to point 1 above, it is considered that the Blocks facing existing public roads and adjacent housing would benefit from a more context appropriate scale in terms of material and articulation. The applicant is requested to reconsider this approach and update plans accordingly.*

### Response

- 2.85 The elevations of Block 4 have been revised and simplified. The corner at the junction with the new pedestrian street, while retaining the aluminium cladding has removed the stone clad 'framing' element in favour of a more solid cladding. Whereas the previous 'framing' emphasized the verticality of the block, the more solid stone cladding now proposed, helps to emphasis the reading of the 4-storey element of Block 4, which relates back to the part 8 residential scheme adjacent.
- 2.86 While aluminium is a different type of cladding to the surrounding residences, we would contend that the metal cladding not only ties in with the metal cladding in Block 3 and is used on Block 4 to mark the new entrance to the development, but the metal cladding is used to reflect the industrial heritage of the site. Whereas the previous elevations submitted used stone cladding to frame and emphasise the aluminium, the revised elevation emphasises the solid stone element, with the metal cladding more visible at the upper floor and grounding the lower plinth level with the street. We would contend that the simplified design of the elevations along with the increase of solid stone cladding is more appropriate to the context of Block 4.

- 2.87 The elevation of Block 4 is illustrated in Drawings Nos. KRC-BKD-04-ZZ-DR-A-2000 and KRC-BKD-04-ZZ-DR-A-2001 prepared by BKD Architects. Further to this, the junction of Block 4 and the public realm is displayed in the verified photomontages prepared by 3D Design Bureau.
- 2.89 The drawings and photomontages prepared illustrate that the proposed elevations of Block 4 address the Kinsale Road in an appropriate manner in regard to both scale and articulation, positively contributing the Kinsale Road public realm.

### Detailed Item 13 – Elevations Design and Massing

*It is considered that the verticality of the peripheral blocks should be reconsidered with respect to the elevations design and massing etc. Block 4 also benefit from a distinction between the Ground Floor retail and upper levels residential uses via the deployment of a ground floor 'plinth' elevational treatment similar to the approach used in Block 3.*

#### Response

- 2.90 Revisions to the materials and design of Blocks 1, 2 & 4, now downplay the verticality of the blocks, and emphasis more the 3-storey shoulder height (Blocks 1 & 2) or 4-storey shoulder height (Block 4) which is more in keeping with the scale of the receiving environments.
- 2.91 A distinction has been made to the material between level 0 and level 1 of Block 4, which allows for a potential signage zone for the retail units at level 0. This banding also creates a plinth effect on the lower level.
- 2.92 The elevations of Blocks 1,2 and 4 are illustrated in Drawings Nos. KRC-BKD-01-ZZ-DR-A-2000, KRC-BKD-02-ZZ-DR-A-2000, KRC-BKD-04-ZZ-DR-A-2000 and KRC-BKD-04-ZZ-DR-A-2001. Additionally, all elevations are illustrated in the verified photomontages prepared by 3D Design Bureau.
- 2.93 The drawings and photomontages prepared illustrate that the proposed elevations have reduced the emphasis of the verticality of the elevations and appropriately respond to the receiving environment.

### Detailed Item 14 - Overlooking

*The applicant is requested to address the relationship between Block 3 and existing low-density housing to Pearse and Kinsale Roads respectively with regard to the potential for overlooking and impacts on privacy.*

#### Response

- 2.94 Block 3 has been located internally within the site to allow for increased heights while also mitigating any potential for overlooking of existing dwellings located on both the Pearse Road and Kinsale Road.



- 2.95 The location of Blocks 1 & 2 as well as Blocks 4 and the adjacent Part 8 scheme mitigate against much of the potential for overlooking - this is illustrated in the below diagram by the yellow line in the section below viewing from window height at the top floor of Block 3 across the parapets of the adjacent Block 2 and the adjacent Part 8 Scheme.



**Figure 6 Relationship Between Block 3 and Adjacent Existing Dwellings.**

- 2.96 By the nature of the proposed pedestrian link through the site via Pearse Road and Kinsale Road, there is a direct view some units in Block 3 to both Pearse Road and Kinsale Road. However, Block 3 is located 75m from the houses on Pearse Road at the nearest point and 92m from the houses on Kinsale Road. These separation distances are considered to be substantial and do not give rise to any undue loss of privacy.
- 2.97 We would contend that with these distances, the impact on privacy to the Kinsale Road and Pearse Road houses is minimal and that the openings in the block are an important feature of the new development, linking the centre of the scheme with Kinsale and Pearse Roads, as shown in the CGI images below.



**Figure 7 View of Block 3 from Pearse Road.**





**Figure 8 View of Block 3 from Kinsale Road.**

### **Detailed Item 15 – Cycling Route**

*Secure surface level bike storage has been addressed more broadly across the same which is welcomed in principle. Regarding the main east-west cycle/pedestrian route, the omission of Part M ramps via deployment of 1:21 gradient is welcomed in reducing handrails and visual clutter. It is acknowledged the potential issues raised re. creating speed ramps via the main pedestrian/ cycle route. However, consideration should be given to a more direct cycling route, if possible, in conjunction with the meandering ramps and/or include bicycle wheel channel adjacent to the stepped sections.*

### **Response**

- 2.98 While we acknowledge the concerns raised regarding potential speed ramps being created along the main pedestrian and cycle route, it is important to note that the current meandering alignment strikes an appropriate balance. The gentle 1:21 gradient is designed to accommodate shared use safely, promoting low-speed movement and reducing the likelihood of conflict between pedestrians and cyclists.
- 2.99 That said, consideration has been given to providing a more direct cycling route where feasible. However, due to the topography, a more direct route into the heart of the development would necessitate a steeper gradient, which could lead to unsafe speeds and increased risk of pedestrian-cyclist conflict. To address this, we have incorporated a stepped shortcut featuring a bicycle wheel channel alongside the primary accessible route. This solution offers an alternative for cyclists who prefer a more direct path, while ensuring safety and inclusivity. Further details on this design approach can be found in the Landscape Design Rationale Report, page 41, Section II.

### Detailed Item 16 – Block 3: Daylight and wind analysis

*It is requested that further daylight and wind analysis is undertaken regarding the proposed tall building, Block 3.*

#### Response

- 2.100 A Daylight and Sunlight Assessment Report has been prepared by 3D Design Bureau and accompanies this submission. The Daylight and Sunlight Assessment has assessed the proposed development on a performance basis as well as an impact assessment, this assessment has been undertaken in accordance with the BRE guidelines. This assessment finds that all elements of the proposed development, including Block 3 perform favourably from a daylight perspective.
- 2.101 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.

### Detailed Item 17 – Play Area

*Section 4.10 to 4.13 of Design Standards for New Apartments apply, in particular: 4.13.. Children's play needs around apartment buildings should be catered for:*

- (a) 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; &*
- (b) 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.*
- (c) More detailed design of the proposed external play and amenity areas directly adjacent/ linked to the proposed Apt. blocks should be provided.*

#### Response

- 2.102 A Landscape Design Rationale Report and Landscape Masterplan Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101 have been prepared by CSR and accompany this application.
- 2.103 Across the proposed development, 2,896.8 sqm of open space is provided, this comprises of 1,389.1 sqm of public open space, and 1,507.7 sqm of communal open space for exclusive use of the residents on site.
- 2.104 As illustrated in the Landscape Masterplan and detailed in the Landscape Design Rationale Report, the proposed development provides for a playground area and a lawn area within both areas of open space which provide for sufficient play spaces for children of all ages. In addition to this, both open spaces have

sufficient provision of seating to ensure there are sufficient facilities for those monitoring children. Additionally, all open spaces are centrally located and sufficiently overlooked to allow safe uses of these spaces.

#### **Detailed Item 18 - Statement of Design Acceptance**

*It is noted that the applicant has made a Pre-Connection Enquiry to Uisce Éireann. As this is an LRD application, the Applicant will need to engage further with UÉ prior to submitting the planning application. The Applicant will need to submit full and final designs to UÉ for review and approval. Once UÉ are satisfied with the design, they will issue a Statement of Design Acceptance. A copy of this statement along with the full design will be required to be submitted with the Planning Application.*

#### **Response**

- 2.105 The design submission was lodged with Uisce Éireann (UÉ) in January, 2025. The latest advice from UÉ is that, as a result of resources constraints, Statements of Design Acceptance (SoDAs) are not being prioritised. Therefore, it is not known how long it will take to secure the SoDA.
- 2.106 In consultation between the applicant's engineers, PUNCH Consulting, and Tony Donovan, Senior Executive Engineer, Cork City Council, on 3<sup>rd</sup> March, 2025, it was indicated that a SoDA was not required for this application. It should be noted that the new foul network within the confines of the site will not be taken in charge by Uisce Éireann.
- 2.107 In further consultation between Aiden O'Neill, Coakley O'Neill Town Planning Ltd and Niall Ó Donnabháin, Director of Services for Planning and Integrated Development, Cork City Council on 2<sup>nd</sup> May, 2025 it was agreed that, having regard to the consultation between the applicant's engineers, PUNCH Consulting, and Tony Donovan, Senior Executive Engineer, Cork City Council, the application could be progressed without the SoDA, with it to be submitted either in response to a Request for Further Information (RFI) or to a condition of a permission.

#### **Detailed Item 19 - Drainage**

*The proposed drainage strategy is not acceptable for taking in charge due to the proposed attenuation tanks. However, if it is not intended for the development to be taken in charge, the proposed drainage strategy is acceptable. Please clarify the intention with respect to Taking in charge in the formal application.*

- (a) *The Applicant has shown a proposed storm sewer from the site along Kinsale Road connecting into an existing storm sewer. This is shown within the red line boundary, but no letter of consent was included in the (submission). A letter of consent from CCC may have to be included with the formal application.*
- (b) *Prior to submitting the formal application, please engage with the Drainage Section to agree the requirements for the proposed storm sewer. This will include picking up all existing surface water gullies which currently connect to the combined sewer.*

### Response

- 2.108 A letter of consent from Cork City Council has been obtained in respect of works to be carried out in the public roads in the ownership of Cork City Council i.e. Pearse Road and Kinsale Road, to facilitate the connections to water and wastewater services. This letter of consent is enclosed with the application.
- 2.109 PUNCH Consulting have engaged with the Cork City Drainage Section in February 2024 and March 2025 to define the scope of the stormwater drainage of the proposed development. The agreed scope of works is detailed in section 2.2 of the Planning Engineering Report prepared by PUNCH Consulting Engineers.

### Detailed Item 20 - Landscaping

*Design Considerations for the Landscaping of Open Spaces are required to be submitted at application stage:*

- (a) The planting regime within the open spaces to follow the AU-Ireland Pollinator Plan 2021- 2025. A detailed design to be submitted to the Planning Authority and reviewed by Senior Parks & Landscape Officer/ Biodiversity Officer.*
- (b) The lighting plan for the development to be adapted to be friendly towards nocturnal wildlife. The guidance notes by Bat Conservation Trust on Bats and Artificial Lighting at Night, 08/2023 to be followed.*

### Response

- 2.110 A Landscape Design Rationale Report and Landscape Masterplan Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101 have been prepared by CSR and accompany this application. A full planting schedule has been provided in Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101. As detailed in the Landscape Masterplan all proposed planting is of native species in accordance with the All-Ireland Pollinator Plan.
- 2.111 A public lighting layout plan, drawing no. C25001-EDC-XX-00-DR-E-3000, has been prepared by EDC. This layout has been developed in line with the guidance notes by Bat Conservation Trust on Bats and Artificial Lighting at Night, 08/2023.

### Detailed Item 21 – Survey

*Surveys and Management Plans to be submitted at application stage:*

- (a) Invasive Alien Plant Species survey and potential management plan to be developed and implemented if any IAPS were found within the proposed development boundary.*
- (b) A bat surveys to be conducted on preliminary roost locations within the current buildings on site, dawn & dusk activity surveys and static detector surveys and analysis of bat activity on site. These bat surveys are to locate potential bat roosts, the suitability of the current infrastructure on site for bat roosts and to highlight the bat activity on site as well.*

### Response

2.112 Greenleaf Ecology undertook a site survey in March and April 2025, and, as noted in the EIA Screening Report:

- (a) No invasive plant species included in the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011) or First Schedule of The European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374 of 2024) were recorded within the site or its immediate environs.
- (b) No potential bat roosting habitat was recorded at the site.

### Detailed Item 22 – CEMP

*Construction Environmental Management Plan to be submitted at application stage:*

- (a) *Further detail required in relation to contaminated land and handover from ongoing remediation works permitted under planning reference 2442868. Details on any further mitigation measures or monitoring to be outlined.*
- (b) *Further detail required in relation to piling. Bored piling as opposed to percussive piling shall be prioritised for the construction process.*
- (c) *Further detail required in relation to asbestos management process.*
- (d) *Further detail required in relation to the proposed dust minimisation plan on nearby residential properties.*
- (e) *Further detail required in relation to noise and vibration monitoring locations. CEMP to align with mitigation measures outlined in requested Noise Impact Assessment.*
- (f) *In relation to 5mm/sec peak vibration limit suggested in Section 12.3, outline within final report how this complies with British Standard BS 5228-2:2009: Code of practice for noise and vibration control on construction and open sites.*
- (g) *Further detail in relation to site/security lighting during construction to be outlined and measures that will be put in place to mitigate and nuisance at nearby receptors.*
- (h) *Working hours to be listed within CEMP as: "Working hours during site clearance and construction shall be restricted to 0800-1800 hours on Mondays to Fridays and to 0800-1600 hours on Saturdays. Activities outside these hours shall require the prior approval of the Planning Authority."*

### Response

2.113 A Construction and Environmental Management Plan has been prepared by PUNCH Consulting Engineers and accompanies this application. In relation to the above items noted above, the CEMP outlines the following:

- a) Please refer to the Remediation Status Report has been prepared by RSK and accompanies this application for further details in regard to site contamination, site investigation and remedial measures undertaken. Currently, the Site is at Stage 3 of the EPA guidance workflow – the verification process is currently underway which involves the collection of groundwater samples from boreholes collected across 2 rounds spaced 6 months apart. It is expected the verification process will be completed towards the end of September 2025. Once the verification process is complete a report will be

submitted to the EPA to support an application for surrender of the IPPC licence. Further detail in relation to the handover of site following the remediation works is contained within Appendix A of the CEMP.

- b) As detailed in section 1.3 of the CEMP, based on current information, it is likely that the foundation of all residential buildings will be made up of Piled Foundations or Pile Raft Foundations. Further investigation is required to ascertain the type of foundation required. Bored piling as opposed to percussive piling will be the preferred option for the construction process in order to minimise vibration levels.
- c) As set out in the Outline Construction & Demolition Resource Waste Management Plan, asbestos present on the site has been removed in accordance with health and safety legislation under planning application reference no. 2140647.
- d) Section 11 of the CEMP details the measures to be undertaken to manage air quality and dust. To prevent dust becoming airborne it is proposed that during dry and windy periods, and when there is a likelihood of dust nuisance, a bowser will operate to ensure moisture content is high enough to increase the stability of the soil and rock and thus suppress dust. During periods of very high winds, construction activities are to be postponed until the winds have subsided. Vehicles delivering material with potential for dust emissions to an off-site location shall be enclosed or covered with tarpaulin at all times to restrict the escape of dust. At the main construction traffic exit, equipment for wheel washing should be made available. Site constraints may not allow for a full-size wheel wash facility. In addition, public roads outside the site shall be regularly inspected for cleanliness, as a minimum on a daily basis, and cleaned as necessary. A road sweeper will be made available to ensure that public roads are kept free of debris.
- e) The Noise Impact Assessment Report prepared by CLV Consulting identifies 2no. monitoring locations, NML 1: near the façade of Block 2 and in the vicinity of the dwellings to the northwest; and NML 2: near the façade of Block 4 and in the vicinity of the dwellings to the east. Section 12.3 of the CEMP includes the mitigation measures set out in the CLV Consulting Report.
- f) Section 12.3 of the CEMP states that *It is recommended that vibration from construction activities be limited to a peak value of 5mm/sec*. BS 5228-1:2009: Code of practice for noise and vibration control on construction and open sites" outlines that the most onerous of limits for cosmetic damage to buildings is 15mm/sec for residential or light commercial buildings. Therefore, the proposed 5mm/sec limit is considered to be a very conservative upper limit and well below the levels that would be likely to cause cosmetic/structural damage to any neighbouring buildings or to cause disturbance for neighbours.
- g) In regards to lighting, as detailed in section 14 of the CEMP, there are no proposals to alter the existing lighting arrangements in the area. It is not envisaged that any existing public lighting will need to be disconnected as a result of the proposed works. Appropriate lighting will be provided as necessary at construction compounds. All lighting will be installed so as to minimise light spillage from the site.
- h) Section 13 of the CEMP has been updated accordingly.

### **Detailed Item 23 - Construction and Demolition Resource Waste Management Plan**

*Construction and Demolition Resource Waste Management Plan to be submitted at application stage:*

- (a) *Reference is made to an Outline Construction Waste Management Plan in the CEMP. This has not yet*

*been provided for review.*

- (b) *The developer is requested to prepare a Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021) including demonstration of proposals to adhere to best practice and protocols.*
- (c) *The RWMP to include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.*

### **Response**

- 2.114 An Outline Construction and Demolition Resource Waste Management Plan has been prepared by PUNCH Consulting and accompanies this application. The RWMP has been prepared in accordance with the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021). Section 2.7 of the RWMP details the measures which will be put in place to ensure the effective monitoring and compliance with the best practice guidelines for waste management.

### **Detailed Item 24 - Waste Management**

*Operational Waste Management Plan to be submitted at application stage:*

- (a) *The information provided in the Operational Waste Management Plan is sufficient at this point.*
- (b) *All bin storage drawings to be submitted in appendix of the Operational Waste Management Plan.*

### **Response**

- 2.115 An Operational Waste Management Plan has been prepared by PUNCH Consulting and accompanies this application. A bin storage location drawing is contained within Appendix A of the Operational Waste Management Plan. Plans of all Bin Stores are provided in Drawing No. KRC-BKD-ZZ-ZZ-DR-A-1200 prepared by BKD Architects.

### **Detailed Item 25 – Swept Path**

*Swept Path Drawing for Refuse Vehicle to be submitted at application stage:*

- (a) *It is not clear if a refuse vehicle can enter and turn at all of the collection areas within the development. A swept path analysis of a refuse vehicle would be required for all collection points within the site - including Apartment Block 1 and Block 2. Or further detail should be included on the collection process from apartment blocks 1 and 2.*



### Response

- 2.116 An Autotrack Analysis Drawing has been prepared by PUNCH Consulting Engineers and accompanies this application, Drawing No. 214130-PUNCH-XX-XX-DR-C-0601. This Autotrack Analysis illustrated that a refuse truck can safely manoeuvre from Kinsale Road to collect refuse at the 2no. designated refuse areas adjacent to Blocks 3 and 4.
- 2.117 Waste from Blocks 1 and 2 will be brought from the dedicated waste storage areas to the collection points by members of staff on-site. As detailed in Section 3.2 of the Operational Waste Management Plan, waste and recycling bins from the dedicated WSA will be collected directly from the WSA by the waste contractor or staff member (depending on operational agreements), taken to the designated collection point and immediately returned to the WSA after emptying. Bins will not be moved to the waste collection point in advance of collection times and will be removed immediately on emptying.

### Detailed Item 26 – Noise Impact Assessment

*Noise Impact Assessment to be submitted at application stage:*

- (a) Both an inward and outward noise impact assessment required. To show the impact of the development during construction and operation on the surrounding receptors.*
- (b) Assessment to also show potential impact of surrounding environment and existing road network on noise levels within the development amenity area, balconies and within the apartments themselves*
- (c) Consideration of noise generated from mechanical plant such as heat pumps to be factored in as well as noise generated from bin storage areas, substation, plant rooms, creche and cafe. Any proposed mitigation measures to reduce the noise impact from these areas shall be included within the report. Reference should be made to acceptable noise levels from proposed mechanical equipment to ensure no nuisance on properties once installed, a data sheet of the proposed equipment or similar should be provided. Particular attention should be paid to apartments above, below or adjacent to the above-mentioned areas.*

### Response

- 2.118 A Noise Impact Assessment has been prepared by CLV Consulting and accompanies this application, assessing both inward and outward noise impacts.
- 2.119 In regard to outward noise impacts, during the construction phase of the project, there is only expected to be a slight to moderate noise impact on the nearest residential dwelling to the northeast (4 Pearse Road) during some construction phases when they occur in close proximity. Predicted construction noise emission levels at all other noise sensitive receptors in the vicinity would be compliant with the recommended thresholds.
- 2.120 During the operational phase of the development, noise levels associated with the proposed development building services plant are therefore negligible.

- 2.121 In regard to inward noise impacts, the development is considered to be fully compliant with the internal area noise requirements contained within the ProPG 2017 and BS 8233 guidance documents and the magnitude of the inward noise impact on the proposed development internal areas would therefore be considered negligible.

### **LRD Opinion Detailed Item 27 – Energy and Climate Statement**

*Energy & Climate Action Statement to be submitted at application stage:*

- (a) *The information provided in relation to Energy and Climate Strategy within the Scheme Sustainability Statement is sufficient at this point. The noise specification for mechanical equipment outlined in Noise Impact Assessment should be factored into selection of future mechanical equipment.*

#### **Response**

- 2.122 An Energy and Climate Action Statement has been prepared by PUNCH Consulting and accompanies this application.
- 2.123 The Energy and Climate Action Statement outlines the sustainability initiatives and strategies implemented into the proposed development and addresses climate adaption, sustainable drainage, energy and environmental management.

### **Detailed Item 28 – BusConnects**

*Applicant to contact National Transport Authority (NTA) to ensure requirements for NTA's Bus Connects Cork STC H- Kinsale Road to City measures in the vicinity of their site are included in their application.*

#### **Response**

- 2.124 Consultation with the NTA has ensured that the site layout for the proposed Large-scale Residential Development (LRD) has aligned with the future BusConnects corridor along Kinsale Road. Please refer to Appendix E of the Traffic and Transportation Report prepared by PUNCH Consulting Engineers for correspondence from the NTA regarding the provisions for the BusConnects corridor.
- 2.125 Robert Parkinson, Strategic Planning Section, NTA confirmed by email on 3<sup>rd</sup> June, 2025 that discussions have taken place with PUNCH Consulting concerning the proposed development at the Vita Cortex site on the Kinsale Road and its interface with STC H, and that the layout proposed by PUNCH Consulting in the drawing Document No. 213130-PUNCH-XX-XX-DR-C-0461 (Revision No. C02) (Model Ref. 214130-PUNCH-XX-XX-M2-C-0461) would not compromise the development of the necessary BusConnects infrastructure on this STC scheme. It is also stated that notwithstanding the confirmation of this matter, engagement by the NTA has been undertaken without prejudice to any future application that may arise at this location and any observations the NTA may submit to Cork City Council as part of the statutory planning process.

## Detailed Item 29 – Landscaping

*Landscaping Plan to be submitted at application stage:*

- a) *Cross Sections of all open spaces - especially the pedestrian access from Pearse Road into the development.*
- b) *The maintenance and long-term management of all open spaces needs to be included for review.*
- c) *The interface between the Communal Open Space and the Public Open space is unclear, and will need to be clarified — is the boundary fencing, a solid wall.*
- d) *The Apartment block on Pearse Road which bound the Public open space — how is this secured from the public open space.*
- e) *There is no mention of play provision in the communal area, as outline in Sustainable Urban Housing: Design Standards for New Apartments — this needs to be addressed.*
- f) *Full landscape drawings will be required for review.*

## Response

- 2.126 A Landscape Design Rationale Report and Landscape Masterplan Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101 have been prepared by CSR and accompany this application. Sections of public open spaces are provided in Drawings Nos. CTC/2/XX/XX/00/DR/CSR/LA/201 and CTC/2/XX/XX/00/DR/CSR/LA/202 prepared by CSR.
- 2.127 A full planting schedule has been provided in Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101. As detailed in the Landscape Masterplan all proposed planting is of native species in accordance with the All-Ireland Pollinator Plan.
- 2.128 The Communal Open Space is situated on the podium roof above the partial basement parking structure, resulting in a level difference of approximately three metres between it and the adjoining Public Open Space. This elevation change necessitates a clearly defined boundary for safety, privacy, and functional separation. Further information on the proposed treatment of this interface, including design intent, is provided in the Landscape Design Rationale Report, page 41, Section HH.
- 2.129 The interface between the apartment block on Pearse Road (Block 1) and the adjoining Public Open Space is defined by a subtle level change of approximately 300mm between the central lawn area and the building entrance. This elevation difference, combined with a generous band of planting, creates a clear physical and visual buffer between the public realm and the private curtilage of the building. Additional elements contribute to this separation, including bicycle parking, which acts as a passive visual barrier. The planting design within this buffer zone will feature a mix of medium to large shrubs along with intermittent sections of hedging, further reinforcing privacy and delineating the transition between public and semi-private space.
- 2.130 Across the proposed development, 2,896.8 sqm of open space is provided, this comprises of 1,389.1 sqm of public open space and 1,507.7 sqm of communal open space for exclusive use of the residents on site.

- 2.131 As illustrated in the Landscape Masterplan and detailed in the Landscape Design Rationale Report, the proposed development provides for a playground area and a lawn area within both areas of open space which provide for sufficient play spaces for children of all ages. In addition to this, both open spaces have sufficient provision of seating to ensure there are sufficient facilities for those monitoring children.

#### **Detailed Item 30 – Nature Based Solutions**

*While Sustainable Urban Drainage Systems (SUDS) and Nature Based Solutions (NBS) are mentioned in the submitted documentation — there should be scope in the larger open spaces to incorporate Nature Based Solutions. Information to be provided to include — to scale drawings including sq. metres of each SUD feature, Cross sections, Depth of soil / Soil types used, make up of soil structure for the depth of the SUDs feature, planting details, and maintenance and management plans.*

#### **Response**

- 2.132 Section 2.3 of the Planning Engineering Report prepared by PUNCH Consulting Engineers details the SUDs proposals for the development including maintenance and management details. Further to this, scaled drawings have been prepared by PUNCH Consulting Engineers which include sq. metres of each SUD feature, Cross sections, Depth of soil / Soil types used, make up of soil structure for the depth of the SUDs feature, planting details. For further information on planting schedule please refer to the Landscape Masterplan prepared by CSR.

#### **Detailed Item 31 – Communal Open Space**

*The development of public open space over structures, such as underground car parks, is also becoming more frequent, in these cases the design and structural loading capabilities of the subsurface structures require an integrated approach with the open space proposals above. In all cases the provision of a fully designed public open space with the required recreational facilities shall not be compromised. The future maintenance responsibility of such provisions, if taken in charge by the City Council, will require clear delineation vertically both in drawings and physically within the development.*

#### **Response**

- 2.133 A Landscape Design Rationale Report and Landscape Masterplan Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101 have been prepared by CSR and accompany this application. As detailed within these documents, 1,507.7 sqm of communal open space for exclusive use of the residents on site is proposed to be developed on the podium of the undercroft basement parking. This open space will provide a high-quality playground area and a lawn area. The provision of open space at this location provides for a high-quality open space which will meet the needs of all future residents.
- 2.134 It is not proposed that any areas of the proposed development are to be taken in charge by Cork City Council.

### Detailed Item 32 – Pearse Road Interface

*The interface of the Apartment blocks and the public domain on Pearse Road is requested to be softened with landscaping.*

#### Response

- 2.135 As illustrated in the plans prepared by BKD Architects, Drawing No. KRC-BKD-ST-01-DR-A-1003, Blocks 1 & 2 have been set back off Pearse Road to allow for inclusion of a front terrace area for each townhouse apartment unit fronting onto the Pearse Road.
- 2.136 In response to the request to soften the interface between the apartment blocks and the public domain along Pearse Road, additional planting has been incorporated adjacent to the building entrances and within the defensible strips fronting the public footpath. These landscaped areas will include a combination of low shrubs and small multi-stemmed trees, contributing to a more welcoming and visually softened edge. This planting will be particularly effective when the building is viewed obliquely from Pearse Road, enhancing the overall streetscape character and providing a more human-scale transition between the public and private realms.

### Detailed Item 33 – Car Parking

*Car Parking Provision to be submitted at application stage:*

- (a) *The applicant is requested to ensure that all vehicular parking spaces are equipped with appropriate infrastructure (ducting) to allow for future fit out of a charging point.*
- (b) *It is unclear if service delivery to the retail units has been considered. Adequate or designated space(s) should be provided within the car park to accommodate delivery vehicles and prevent illegal parking resulting dangerous situations both in the car park area and on the public road.*

#### Response

- 2.137 The proposed car parking provision of 82no. spaces is illustrated in Drawing No. KRC-BKD-ST-00-DR-A-1002. A total of 13no. EV Charging spaces are proposed across the site.
- 2.138 Autotrack Analysis has been undertaken by PUNCH Consulting to ensure that larger vehicles i.e Fire Tender and Refuse Vehicles can safely manoeuvre in the parking and service area associated with the retail units contained within Block 4. The delivery of goods for these retail units will be carefully managed by the management company to ensure that no conflict arises in regard to deliveries and car users.

### Detailed Item 34 – Traffic and Transportation Assessment

*Traffic and Transportation Assessment to be submitted at application stage:*

- (a) *The input data and associated findings with respect to the submitted transport assessment are generally acceptable and no further clarification is required but applicant to ensure all information is up to date as discussed in LRD Opinion meeting.*

### Response

- 2.139 A Traffic and Transportation Assessment has been prepared by PUNCH Consulting Engineers and accompanies this application. The TTA incorporates all comments made during the LRD Opinion meeting.

### Detailed Item 35 – Public Lighting

*Public Lighting details to be submitted at application stage:*

- (a) *The scope of the public lighting (PL) requirements associated with the proposed development including temporary lighting associated with the demolition/construction phase shall be agreed with the PL department of Cork City Council prior to commencement of development.*
- (b) *PL designs shall be submitted to the PL department of Cork City Council through [its@corkcity.ie](mailto:its@corkcity.ie). PL designs shall be agreed with and signed off in writing by the PL department prior to commencement of development.*
- (c) *The lighting design shall cover both the internal public lighting within the development and the public lighting along the curtilage/approach roads to the development.*
- (d) *The PL design shall be made up of a design calculation and a public lighting drawing. The PL drawing shall outline the column type/height, access chamber size/location, ducting route/size and customer service pillar locations as a minimum.*
- (e) *The public lighting design calculation shall be carried out using Lighting Reality software. (f) Public lighting designs shall comply with the latest version of the Cork City Council Exterior Public Lighting Design Requirements Document, a copy of which is available on [www.corkcity.ie](http://www.corkcity.ie).*
- (f) *These works are to be undertaken and paid for by the applicant.*

### Response

- 2.140 A public lighting layout, drawing no. C25001-EDC-XX-00-DR-E-3000, and accompanying report, has been prepared by EDC.

### Detailed Item 36 – Road Safety Audit

*Road Safety details to be submitted at application stage:*

- (a) *No Road Safety Assessment (RSA) was submitted as part of the Opinion Stage application.*
- (b) *An Road Safety Assessment is required for the proposed permanent vehicular entrances onto the Kinsale Road and Pearse Road.*
- (c) *If an alternative temporary vehicular entrance is proposed, an Road Safety Assessment is required for this entrance also.*

### Response

- 2.141 A Stage 1 Road Safety Audit has been prepared by Roadplan Consulting and is provided in Appendix G of the Planning Engineering Report prepared by PUNCH Consulting Engineers.

**Detailed Item 37 – Required Documentation**

*Documents to be included in the application:*

- (a) *Traffic & Transportation Assessment in full words*
- (b) *Road Safety Audits*
- (c) *Swept path analysis for fire tender/refuse trucks.*
- (d) *Lighting Design*

**Response**

- 2.142 A Traffic and Transportation Assessment has been prepared by PUNCH Consulting Engineers and accompanies this application. A Road Safety Audit has been prepared by Roadplan and is appended to the Planning Engineering Report prepared by PUNCH Consulting Engineers and accompanies this application. A swept path analysis for fire tender/refuse trucks has been prepared by PUNCH Consulting Engineers and accompanies this application. A public lighting plan and report has been prepared by EDC and accompanies this application.

**Detailed Item 38 – Kinsale Road**

*Applicant to advise of cross section of Kinsale Road with proposed development. Cross Section requires to adhere to DMURS guidance. Verge must include in-situ tree planting.*

- (a) *Applicant to advise of pedestrian access to the rear of retail store located on Kinsale Road for the residents to utilise.*
- (b) *Applicant to advise of measures to clearly indicate access is only for pedestrians and measure to only allow 'Fire Tender Access' in the event of an emergency, Kinsale Road.*
- (c) *Applicant to remove 'break' in grass/tree verge on Pearse Road to the east of ramp to basement car parking.*

**Response**

- 2.143 Please refer to the DMURS Compliance Statement and the Planning Engineering Report prepared by PUNCH Consulting Engineers for details on interface of the proposed development and Kinsale Road.
- 2.144 The break in the grass/tree verge to the east of the basement ramp on Pearse Road has been removed as requested, this is illustrated in the Landscape Masterplan Drawing No. CTC/2/XX/XX/00/DR/CSR/LA/101.

**Detailed Item 39 – Childcare Need**

*The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals with specific consideration given to the details provided in the Cork City Childcare Report.*



**Response**

- 2.145 A Childcare Needs Assessment has been undertaken by Coakley O'Neill Town Planning Ltd. This Childcare Needs Assessment has illustrated that the proposed creche facility to be provided in Block 3 of the development has sufficient capacity to cater for the childcare needs arising from the development.
- 2.146 In regard to the comments of the Cork City Childcare Committee, the provision of this facility with a dedicated outdoor play space will make for a much needed, high-quality childcare facility.
- 2.147 As indicated within the Social and Community Audit and Childcare Needs Assessment prepared by Coakley O'Neill Town Planning Ltd, as well as the comments from the Cork City Childcare Committee, there is a shortage of childcare spaces within the catchment of the proposed development.

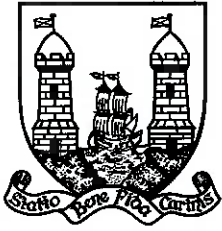
**Detailed Item 40 – Letter of Consents**

*Letter of consent from all affected landowner(s), dated not more than 6 months before the lodgement of the planning application, is required to be provided.*

**Response**

- 2.148 A letter of consent from the landowner, Fronville Ltd. dated the 9<sup>th</sup> of April 2025 is enclosed with this application.
- 2.149 A letter of consent from Cork City Council dated the 5<sup>th</sup> June 2025, in respect of works to be carried out on both Pearse Road and Kinsale Road is enclosed with this application.

## APPENDIX A: COPY OF CORK CITY LRD OPINION



# Comhairle Cathrach Chorcaí Cork City Council

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

Aiden O'Neill,  
Coakley O'Neill Town Planners,  
NSC Campus,  
Mahon,  
Cork

17/12/2024

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

**RE: LRD 07-24**

**Former Vita Cortex site, Kinsale Road and Pearse Road, Cork City**

A Chara,

With reference to your application LRD 07-24 Opinion Stage at Former Vita Cortex site, Kinsale Road and Pearse Road, 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,

Anthony Angelini  
Assistant Staff Officer  
Planning & Integrated Development



**We are Cork.**

## CORK CITY COUNCIL

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

**Written Opinion on a proposed Large-scale Residential Development  
at the former Vita Cortex site Pearse Road/Kinsale Road, Cork City.**

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**The development will consist of:**

'170no. dwellings across 4no. blocks ranging in height from 4 to part 8/part 9 storeys, to include 51no. 1-bed units, 114no. 2-bed units (106no. 2-bed apartments, 8no. 2-bed townhouses); and 5no. 3-bed units (1no. 3-bed apartment, 4no. 3-bed townhouses). The proposed development also includes a crèche, café and management office on the ground floor level of Block 3; and 4no. retail units on the ground floor level of Block 4. The proposed development will also include: 58no. shared car parking spaces (including 11no. EV spaces and 4no. accessible spaces) and 164no. resident bicycle spaces in an under-croft carpark; 24no. customer car spaces (including 5no. EV and 2no. accessible spaces) and 140no. resident bicycle spaces, 148no. visitor bicycle spaces and 28no. retail bicycle spaces at surface level. The proposed development will also include the provision of private, communal and public open space, including all balconies and terraces; internal roads and pathways; pedestrian access points; hard and soft landscaping and boundary treatments; 6no. bin stores; 1 no. ESB substation; plant; green roofs and roof mounted solar panels; signage; and all associated site development, landscaping and boundary treatment, and drainage works, including nature-based SuDS measures. The proposed development will also provide a temporary boundary treatment with Kinsale Road pending the future implementation of Bus Connects'.

**Location:**

The former Vita Cortex site Pearse Road/Kinsale Road, Cork City.

**Applicant:**

BML Duffy Property Group Limited.

**Receipt of valid request for LRD Meeting:**

23.10.2024

**Date of LRD Meeting:**

20.11.2024

**Cork City Council LRD Reference:**

LRD 07-24



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## 1. Introduction

Having regard 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.

This report 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 approximately 1.21 ha, and it is located at the former Vita Cortex site bounded by Pearce Road to the north / west and Kinsale Road to the east. The context is characterised by existing low-rise one and 2-storey dwellinghouses to the east and north. The immediate existing housing along Pearce Road is predominantly one storey in scale apart from Virgin Media Park which is set-back from the Road. Kinsale Road is predominantly residential in nature at its northern end transitioning from residential to commercial and light industrial north to south. To the south-east is Turner's Cross Retail Park. Immediately adjacent to the site to the south is the site of the former Top Tile, a retail warehouse, which has recently had the benefit of a Part 8 permission for a 5-storey apartment block of 39no. apartments (15no. 2-bed units; 24no. 1-bed units). The site is well connected to the city centre and wider Cork Metropolitan Area via Kinsale Road and the South Link Road.

It is noted, the subject site is currently undergoing demolition and decontamination works, planning reference number 21/40647.

## 3. Proposed Large-Scale Residential Development

Key development parameters for residential include:

Site area	1.21 ha
Units/bedspaces	170 units /294 bedspaces
1 bed apartments	51 (51 bedspaces)
2 bed apartments	106 (212 bedspaces)
2 bed townhouses	8 (16 bedspaces)
3 bed apartments	1 (3 bedspaces)
3 bed townhouses	4 (12 bedspaces)
External Amenity Area	3,146.4sqm total including 1,415sqm public plaza and 1,731.2sqm courtyard (inclusive 10.7sqm per bedspace)
Plot ratio	1.5:1 (excluding basement)
Car parking (residential)	58 shared car parking spaces (including 11no. EV and 4no. accessible spaces)
Cycle parking (residential)	164no. resident bicycle spaces (under-croft carpark) 140no. resident bicycle spaces, 148no. visitor bicycle spaces at surface level.
Density	140 units/ha

Key development parameters for commercial include:

On site facilities	Creche (233.1sqm), Café (142sqm), 4no. retail units (881.8sqm)
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Car parking (Customer)	24no. customer car spaces (including 5no. EV and 2no. accessible spaces)
Cycle parking (Customer)	28no. retail bicycle spaces at surface level

#### 4. Relevant Planning History

##### 4.1 The former Vita Cortex site:

###### 24/42868:

Permission granted for development on the site of the former Vita Cortex plant on Kinsale Road and Pearse Road, Ballyphehane, Cork. The proposed development will consist of the remediation of the site, which will involve a combination of excavation and off-site disposal of impacted soils, pump and treatment of groundwater, and importation of stone/soil for backfilling. An on-site temporary compound is proposed for the duration of the proposed remediation works. The existing ESB Substation on the site will remain in situ. The proposed development relates to a development which comprises an activity requiring an Integrated Pollution Control Licence issued by the Environmental Protection Agency (EPA) (Licence No: P0059-02, formerly P0059-01)

###### 21/40647:

Permission granted for the demolition of buildings and associated structures at the Former Vita Cortex plant on the Kinsale Road and Pearse Road, Ballyphehane, Cork, County Cork. The proposed development comprises the demolition of the former Vita Cortex factory structures and outbuildings (floor area: c. 5,976 sq.m) as well as areas of hardstanding and car parking. The existing ESB Substation on the site will remain in situ. The overall site area of the proposed development is 12,062 sq.m).

###### 99/23020:

Permission granted for a two-storey office building and associated car parking facility.

##### 4.2 Nearby sites:

###### Part 8 – Kinsale Road:

Part 8 permission approved for the development of 39no. dwelling units (24 X 1-bed, 15 X 2-bed), 3no. of car spaces, 27no. of bicycle parking spaces and all associated site development works at a site on the Kinsale Road to the immediate south of the proposed development site.

###### 22/40906:

Permission granted for development at the former CMP Dairies site, known as Creamfields, at Kinsale Road and Tramore Road, Cork. the proposed development will consist of the construction of a Primary Care Centre (c. 7,767m<sup>2</sup>), of principally 4 storeys and part 7 storeys in height above ground, to include a ground floor pharmacy (c.290.5m<sup>2</sup>); HSE services at ground, 1st, 2nd and 3rd floor, including an external play area at ground floor; GP and medical support/offices at 4th floor; and medical support/offices at 5th and 6th floor; town square; 98 no. car parking spaces, including EV charging points (57 no. undercroft spaces and 41 no. surface spaces); 45 no. bicycle parking spaces in a dedicated bike store and 9 no. motorcycle spaces in the undercroft; all ancillary plant and facilities at undercroft and surface level, including a generator, substation and switchrooms; rooftop solar PV panels; signage; an upgrade of the Kinsale Road/Mick Barry Road junction to facilitate improved pedestrian access to the Black Ash Park and Ride; an upgrade to the existing access from Tramore Road; pedestrian/cycle lane connections from Kinsale Road and a cycle lane on Tramore Road; all site development works, to include the diversion of the existing combined sewer and manhole, at the c. 1.37ha former CMP Dairies site, known as Creamfields, at Kinsale Road and Tramore Road, Cork. A Natura Impact Statement will be submitted to the Planning Authority with the application.

###### SHD REF ABP-312866-22:

Permission granted for a Strategic Housing Development which comprises of the demolition of existing structures, construction of 352 no. apartments, 254 no. Build to Rent apartments, creche and associated site works. The permission includes a Primary Care Centre (1.37 ha), which is proposed for the northwest

portion of the site. The permitted scheme ranges in height from 1 to 15 floors overground at the former CMP Dairy Site, known as Creamfields, Kinsale Road and Tramore Road, Cork.

#### Other Nearby Sites

Numerous planning applications for extensions/alterations have been made in relation to dwellinghouses and light industrial / commercial units located in the vicinity of the subject 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.

##### 5.1.3 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 Pathway to Increasing New Housing Supply includes a focus on the adequate supply of serviced zoned lands to meet housing need, at required densities.

##### 5.1.4 Southern Region Assembly – Regional Spatial and Economic Strategy 2020 (RSES)

The strategy is to build 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.

#### Cork MASP

Guiding Principles for the Cork MASP 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 a CMATS.
- 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 Cork Metropolitan Area Transport Strategy)

(f) Core Bus Network: A comprehensive network of high frequency bus services operating on a core radial and orbital bus network as provided for in CMATS.

(h) Walking: Make Cork the most walkable city in Ireland, implement and further develop upon the Cork City Walking Strategy 2013-2018 and strengthen the role of walking through improved walkability, with a particular focus on new development areas, access to services at the local level and improved pedestrian accessibility to and within the City Centre area, Town/District Centres and Neighbourhood Centres. Seek and support greenways for walking in addition to cycling.

(i) Cycling: Implement and further develop upon the Cork Metropolitan Area Cycle Network Plan 2017, invest in infrastructure to support the integration of the cycle networks throughout the Cork Metropolitan Area and region, improve and develop primary, secondary, greenway (including the Lee to Sea Greenway) and feeder cycle networks and support cycling through provision of a high proportion of segregated cycleways to provide a safe infrastructure for all.

(j) Public Transport Integration: provision for interchange opportunities across all modes of transport together with information provision and revised fare structures.

(k) Road Network Improvements: Improvements to the road network to support the sustainable growth of the metropolitan area, while also providing appropriate strategic provision for the movement of goods. Investment in the road network supports sustainable travel modes (walking, cycling, and bus networks), supports strategic inter urban and inter regional freight traffic, especially between ports and airports. Improvements discourage secondary local trip and urban expansion based on road corridors. Strategic road corridors are identified by separate objective.

## 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 are:

- Guidelines for Planning Authorities on Sustainable Residential Development and Compact Settlements (2024).
- 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 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

Of importance to the assessment of this application is the recently published *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024*. The following provisions are of relevant to the proposed development:

*The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities "the Guidelines" will constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended). Section 28 provides that planning authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended), in the performance of their functions.*

**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 neighbourhoods<sup>6</sup>, 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 locations<sup>7</sup>, (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) development<sup>8</sup>. 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 Rail<sup>11</sup>, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'<sup>12</sup> 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"> <li>• Local Streets as defined by Section 3.2.1 DMURS.</li> <li>• Private and semi-private open space.</li> <li>• Car parking, bicycle parking and other storage areas.</li> <li>• Local parks such as neighbourhood and pocket parks or squares and plaza's</li> <li>• All areas of incidental open space and landscaping.</li> </ul>	<ul style="list-style-type: none"> <li>• Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.</li> <li>• Lands used for commercial development (inc. retail, leisure and entertainment).</li> <li>• Lands for primary schools, churches and other community services and facilities.</li> <li>• Larger, Regional or District Parks, Wayleaves or rights of way.</li> </ul> <p>Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.</p>

As outlined in Paragraph 3.2.1 of the Guidelines '*Dwellings per hectare (dph) will continue to be the primary measure for residential density*'.

**5.2.2 Other National Documentation**

The following documents are also relevant:

- Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2022) updated 2023.
- Quality Housing for Sustainable Communities (2007).

### 5.3 Local Planning Policy

#### 5.3.1 Cork City Development Plan 2022 – 2028

##### **Volume 2 Chapter A Zoning Maps**

The site is zoned ZO 08 'Neighbourhoods and Local Centres' in Map 07 of Volume 2 of the Plan.

##### **Volume 1 – Chapter 12 – Land Use Zoning Objectives**

The objective of ZO 08 as set out in Chapter 12 of Volume 1 is '*to protect, provide for or improve local facilities.*'

ZO 8.1 - Neighbourhood and Local Centres contribute to sustaining liveable communities and neighbourhoods by fulfilling a local convenience retail, employment and service function, providing a mix of uses and range of services, at an appropriate local scale, to the local population often within a 5- or 10-minute walking distance. Chapter 7 Economy and Employment sets out further objectives for Neighbourhood and Local Centres.

ZO 8.2 - Neighbourhood and Local Centres provide for local convenience shopping, however lower-order comparison shopping may also be open for consideration commensurate to the scale and character of the local centre and its function in the neighbourhood. Neighbourhood and Local Centres also provide a focus for other uses, including but not limited to local services, community facilities, cultural uses, educational uses, medical and healthcare uses, places of public worship, innovation or enterprise centres and limited retail offices. Neighbourhood and Local Centres should also include residential uses, particularly at higher densities that contribute to sustainable compact growth. These can be delivered particularly above ground floor level.

ZO 8.3 - Development proposals in this zone must serve local needs and must demonstrate how the proposal would respect, reflect or contribute to the character and vibrancy of the particular Neighbourhood and Local Centre, commensurate with the nature and scale of the development. Developments must deliver a quality urban environment and public realm with a focus on accessibility and permeability.

##### **Volume 2: Chapter B - Density and Heights**

In terms of density and height designations the site lies within the 'Inner Suburbs' (Ref: Map 06 of Chapter B Density and Heights Maps of Volume 2 of the Plan). These maps are based on the supporting document 'Cork City Urban Density, Building Height and Tall Building Study'. Text in relation to density and height is available in Volume 1 of the Plan and is outlined in more detail below.

##### **Volume 1**

##### **Chapter 2 Core Strategy**

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.*

#### **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 neighbourhoods in the proximity of the site including, South Parish (06), Ballyphehane (30) and Turners Cross (36).

#### **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).'

#### **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 2.24: '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 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.

(Objectives 2.13 'Design-Led City', Objective 2.14 'Walkable Neighbourhoods' and Objective 2.15 'Cork City Neighbourhood Profile' are also of relevance.

### **Chapter 3 Delivering Homes & Communities**

#### Delivering a Good Mix of Housing

3.27 The Joint Housing Strategy/Housing Need and Demand Assessment provides an 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.

3.31 Specific exemptions to Part V are:

- Semi-independent or supported living accommodation for older people or persons with a disability; and
- Purpose-built student accommodation.

3.32 Build-to-rent and shared accommodation developments will not be exempt from Part V requirements.

3.33 The HNDA illustrates that housing will be needed to provide for the household sizes set out in Table 3.4 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
<b>Total</b>	<b>1353</b>	<b>2706</b>	<b>2706</b>	<b>2706</b>	<b>2706</b>	<b>2706</b>	<b>1353</b>	<b>16,236</b>	<b>100</b>

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

Year	2022 H2	2023	2024	2025	2026	2027	2028 H1	Total
<b>Social Housing</b>	276	552	552	552	552	552	276	3,312
<b>Affordable Housing</b>	172	344	344	344	344	344	172	2,064

Table 3.5: Overview of social and affordable housing requirements.

- 3.34 Private housing solutions for one-person household demand will be varied and include: one-bedroom flats (owner occupied, private rental and Build-to-Rent) and studios in the form of Shared Accommodation and Purpose-Built Student Accommodation.

#### Build-to-Rent and Shared Accommodation

3.35 - The 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines (DHPLG, March 2018) establish Build-to-Rent (BTR) and Shared Accommodation (SA) as part of the housing mix for urban centres and locations accessible to high-quality public transport (i.e. adjacent to train stations or LRT stops). The housing models and their development standards are clearly defined within the Guidelines. The new housing models are defined as specific housing tenures.

3.36 Build-to-Rent are apartment complexes with long-term rental and resident support facilities and resident services and amenities (SPPR7). Build-to-Rent schemes will not be subject to dwelling mix requirements and are subject to very specific development standards (SPPR8). They are subject to Part V requirements.

3.37 Shared Accommodation are complexes of studios with shared / communal facilities. The Sustainable Urban Housing: Design Standards for New Apartments (updated in December 2020) states that there shall be a presumption against granting planning permission for share accommodation / co-living developments unless the specific provisions of SPPR9 are met. In SPPR9, exceptions require that either there were planning applications under assessment at the time of the making of the Guidelines or that a specific demand was identified for shared accommodation / co-living development in the HNDA. Neither of these apply to Cork City. Therefore, there is a presumption against shared accommodation / co-living development in Cork City.

#### Objective 3.4 'Compact Growth' states that:

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.*

#### **Chapter 4 – Transport and Mobility**

Several objectives are of relevance in this chapter including Objective 4.1 ‘CMATS’, Objective 4.4 ‘Active Travel’. Objective 4.5 ‘Permeability’ states as follows:

- ‘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**

##### **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 5.13 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.*

Other objectives of relevance include 5.18 ‘Roof top Solar Photovoltaic/Thermal Panels’, 5.22 ‘Electric Vehicles.’

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

##### **View Management Framework**

6.27 Cork City Council seeks to manage development through its View Management Framework in order to protect the views and prospects of special amenity value and the amenities of places and features of natural beauty or interest, where these are not protected by other objectives of this Plan.

These views are seen from places that are publicly accessible and well used and include significant buildings or urban landscapes that help to define Cork City at a strategic level.

6.30 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.

#### 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 need to be considered in the scoping of views to identify the potential impacts of development proposals.

#### **Chapter 8 Heritage Arts & Culture**

Strategic Objective 7 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.*

### **Volume 3 Built Heritage Objectives**

#### **Record of Protected Structures**

Part 2 of Volume 3 identifies the Church of Christ the King, Turner's Cross as a Protected Structure (Ref PS 744).

The building is also listed on the National Inventory of Architectural Heritage (N.I.A.H.) as being of regional significance (Ref: 20505513). It is described as follows:

*'Detached irregular octagonal-plan church, built 1931, with central entrance-bay having sculpture surround to the west, flanked by staggered bays. Pitched pantile roof having continuous glazing to apex. Textured rendered walls with rendered stepped plinth. Vertical stained glass glazing to staggered bays. Pair of pointed door openings having pairs of timber doors and approached by flight of steps. Retaining interior fixtures and fittings'*

The N.I.A.H. appraisal states as follows:

*'This church was designed by American architect F. Barry Byrne in 1928, and it is a landmark building in the history of architecture in Ireland. The building, which was opened in 1931, is representative of international architectural design and theory at that time. The materials and techniques utilised in the construction add technical interest to the building. The Roman Catholic Church unusually commissioned this non-Irish architect, who had been a student of Frank Lloyd Wright, to design an inexpensive church for an expanding suburb. The imposing sculpture over the entrance door was designed by American sculptor and painter John Storr, who had been a student of Rodin and had worked with Lloyd Wright and Louis Sullivan. The interior of the building retains many original features and materials which are set within an uninterrupted and bright open space'*

### **Chapter 9 Environmental Infrastructure**

Several objectives are of relevance including:

#### **9.2 Wastewater**

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.

#### **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.

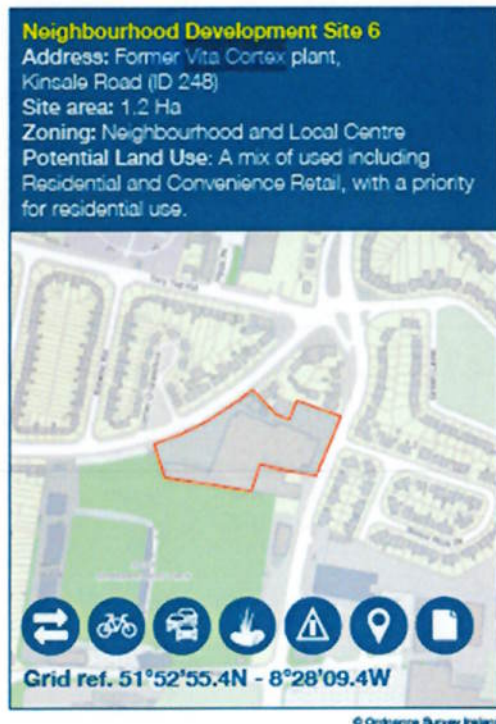
#### **9.6 Storm Water**

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.

### **Chapter 10 Key Growth Areas and Neighbourhood Development Sites**

The site is identified as 'Neighbourhood Development Site 6' within Chapter 10 of the Plan. Objective 10.100 'Neighbourhood Development Sites' states as follows in relation to such sites: 'Cork City Council in collaboration with landowners and relevant stakeholders will progress the neighbourhood development

sites through active land management. These sites will benefit the local neighbourhood and support compact growth. Development proposals will address the relevant points highlighted by the text and icons associated with the maps and relevant objectives throughout this plan'. The graphic for Neighbourhood Development Site 6 is reproduced below:



The key to the 7 symbols on this image is explained on P.450 of Volume 1 of the Plan and extract below:

#### **Access & Permeability**

*'Consideration should be given to permeability and how users will access the site from any adjoining roads or paths. This includes access by all modes of transport, with priority given to sustainable and active travel. Connections to all nearby local roads should be maximised.'*

#### **Active Travel Plan**

*'An Active Travel Plan should be submitted as part of planning application on this site. Development should demonstrate how connections are to be maximised for ease of access to community facilities, neighbourhood centres, schools, local services, public open space, existing paths and public transport.'*

#### **Transport Assessment**

*'A traffic and transport assessment is required as part of the planning application. Pre-planning consultations will clarify the level of assessment required (e.g., a transport statement or a more detailed Traffic Impact Assessment)'*

#### **Sustainable Drainage System (SuDS)**

*'SuDS details are required at the planning application stage. Proposed SuDS systems should maximise use of permeable and natural materials, support biodiversity and avoid culverts.'*

#### **Land Contamination**

*'A land contamination assessment may be required to be submitted as part of the planning application. Pre-application consultations will clarify the level of detail required.'*

#### **Place Making Priority**

*'Public realm improvements are required and should be considered as part of any development proposal.'*



## **Design Document**

*'a design brief or masterplan should be submitted as part of the planning application. Pre-planning consultations will clarify which type of document is required'.*

## **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.*

### **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 is located in the Inner Urban Suburbs.

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. Within the Inner Urban Suburbs (which includes South Link Road Corridor) the prevailing heights range from 2 – 3 storeys with target heights between 3 and 4 storeys.

#### 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.*

11.51 *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.*

#### 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;*
- 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.

#### 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. Applications for 10-50 dwellings will need to provide a dwelling size mix that benefits from the flexibility provided by the dwelling size target ranges provided for the respective sub-area.

#### 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.*

#### **Transport and Mobility**

##### **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.*

##### **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.*

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.

##### **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.*

Table 11.14 outlines Bicycle Parking Requirements for residential apartments at a rate of 1 space per unit in the city centre / inner urban areas. The requirement for retail is 1 per 100sqm GFA. The requirement for restaurant / cafe is 1 per 200sqm GFA. The requirement for creche is 1 per 25 children.

#### 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.

The ongoing remediation works on the subject site is noted, planning ref no. 2442868.

#### **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.

## **Chapter 12 Land Use Zoning Objectives**

The zoning objective for the site has been outlined above.

### Placemaking

12.19 Overarching objectives for development in Cork City are set out in the Core Strategy in Chapter 2. Development proposals in every zone must have placemaking as a primary consideration and must demonstrate 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.

All developments must deliver or contribute towards a quality urban environment and public realm with a focus on accessibility, pedestrian priority and permeability. Chapter 11 Placemaking and Managing Development provides further detail and development guidance.

### Climate Resilience

12.20 Development proposals in every zone must consider climate resilience from the design to implementation stages. This includes site selection, with a presumption in favour of Brownfield locations, sustainable mobility, reducing energy usage and emissions, use of renewable energy and technologies, climate change adaptation and mitigation measures including flood risk, landscaping including green infrastructure and biodiversity and use of green construction methods. Chapter 11 Placemaking and Managing Development provides further detail and development guidance.

### Sustainable Community and Neighbourhood Development

12.24 Development proposals in every zone must consider how they contribute to the development of sustainable communities and neighbourhoods, with larger development proposals providing community uses or facilities commensurate with the scale of the development and the neighbourhood. Chapter 11 Placemaking and Managing Development provides further detail and development guidance.

### **5.3.2 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.

The National Transport Authority (NTA) launched the second round of public consultation on the Sustainable Transport Corridors earmarked for development as part of the BusConnects Cork programme in March 2023 with submissions accepted until 25<sup>th</sup> May 2023.

One of the Sustainable Transport Corridor (STC) is located close to the proposed development site, namely STC H- Airport Road to City, which routes along Kinsale Road.

### 5.3.3 Cork City and County Joint Housing Strategy and Housing Need Demand Assessment

This strategy 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.

## 6. Section 247 Consultation with the Planning Authority

2no. S247 pre-planning consultation meetings were held between the applicant team and the Planning Authority on 07/02/2024 and 14/05/2024.

The main items discussed at S247 stage included but is not restricted to:

- Maximum building heights & density, concerns about Block 3 height, detailed justification required.
- Industrial heritage of the site
- Permeability from Pearce Rd to Kinsale Rd.
- Traffic, Transportation and Bus Connects, details of affected junctions & a mobility management plan required.
- DMURs, recommendation to widen pedestrian areas at plaza/café, pedestrian priority at vehicular crossings.
- Drainage matters.
- Landscaping / open spaces
- Architecture, with particular focus on local character, scale, configuration of gable blocks and revisiting eastern part of the site to reduce hard landscaping and to enhance greening.
- Environment matters.

The record of the meetings is included as Appendix 1, in accordance with the requirements of Article 16(A) of the Planning and Development Regulations 2001 (as amended).

## 7. LRD Meeting

A meeting under Section 32C of the Planning and Development Act 2000 (as amended) took place via Microsoft Teams on 20.11.2024 between representatives of the prospective applicant and Cork City Council.

The main topics discussed at the meeting were: -

- Query re progress of the current remedial works on the site which were permitted under planning reference, 24/42868.
- Design Statement.
- Housing mix.
- Height and density.
- Visual Impact Assessment (VIA).
- Traffic and Transportation assessment.
- Public Transport.
- Traffic Regulations & Safety (TRS)
- Environment matters.
- Lighting.
- Energy & Climate Action Statement.
- City Architects.
- Drainage matters, Wastewater & Stormwater.

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;
- Biodiversity;
- Infrastructure;
- Traffic Regulations & Safety including Public Lighting;
- Parks & Recreation Section.

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 Cork City Childcare, Cork County Council, Health & Safety Authority, IAA, Irish Fisheries, NTA, TII 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:

- Pre-Application Consultation Application Form.
- Landowner Consent letter.
- Cover Letter.
- Social and Community Audit.
- Planning Statement.
- Childcare Needs Assessment.
- Part V Reports Units & Costings.
- Landscape Design Rationale.
- Landscape Plan.
- Planning Engineering Report.
- Outline Operational Waste Management Plan.
- Construction Environmental Management Plan.
- Traffic And Transportation Assessment.
- DMURS Compliance Statement.
- Mobility Management Plan.
- Scheme Suitability Statement.
- Outline Construction Traffic Management Plan.
- Engineering Drawings.
- Design Statement.
- Schedule of Floor Areas.
- Drawing Issue Sheet.
- Site Layout / Location.
- Plans/Sections/Elevations.

### 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:

- Cork City Development Plan 2022-2028
- Housing for All: A New Housing Plan for Ireland
- Project Ireland 2040: National Planning Framework
- Urban Development and Building Heights guidelines (2018)
- Compact Settlement Guidelines (2024)
- Southern Regional Assembly: Regional Spatial and Economic Strategy
- Cork Metropolitan Area Strategic Plan (MASP)
- The Planning System and Flood Risk Management (2009)
- Cork Metropolitan Area Transport Strategy (CMATS) (2020)
- The Planning System and Flood Risk Management (2009)
- Urban Design Manual – A Best Practice Guide (2009)
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2022)
- Childcare Facilities – Guidelines for Planning Authorities

The statement adopts a report format to identify relevant policy provisions and to set out how it is considered that the proposed development is consistent therewith. The documentation does not identify or describe any potential material contravention of the Development Plan.

### 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. The targets for density and building heights are set out in Table 11.2 of Chapter 11 of Volume 1 *Written Statement* and in Volume 2 *Mapped Objectives* in the *Cork City Development Plan 2022-2028*. The subject site is located within the *Inner Urban Suburbs (No.5 South Link Road Corridor)*. For this area, the target dwellings per hectare (dph) is between 50-100. The target for building heights ranges from 2-4 storeys. As the proposed development significantly exceeds the upper limit of these targets in terms of density and building height, at application stage, as part of an updated Planning Statement/Statement of Consistency, the applicant is required to provide a robust justification for the density and building heights of the proposed development, having regard to local, regional and national planning policy and the relevant Ministerial Guidelines. In order to address this, a revised design of the proposed development may be required.
2. At application stage, the applicant shall set out the rationale / justification of the development in terms of the building height of proposed Block 3 and the potential visual impact on the local area. 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. 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). In order to address this matter, a revised design of the proposed development may be required.
3. At application stage, the applicant shall submit a full Visual Impact Assessment to include the appropriate catchment area of existing and proposed views and an accompanying written assessment setting out the methodology, findings and conclusions of the assessment. Further consideration of the visual impact of the scheme shall include an assessment of whether the development would be excessive in height/visually incongruent when viewed from close range views (from viewing receptors i.e. passing pedestrians, cyclists and vehicle users) along Kinsale Road (north and south approaches) and Pearse Road (east and west approaches) and the potential impact on the Strategic Linear View of the designated Local Landmark Buildings of Christ the King Church, Turner's Cross to the north. In this regard you are requested to note Development Management guidance under Paragraphs 11.16 and 11.18 of the *Cork City Development Plan 2022-2028*. A revised design strategy of the proposed development may be required.
4. Further consideration and amendments to the housing mix for the residential element of the proposed development is required, having regard to Objective 11.2 and Table 11.8 of the *Cork City Development Plan 2022-2028*. If the proposed housing mix is not aligned with the housing mix targets in Table 11.2, the applicant shall provide a separate Housing Mix report setting out a justification on the basis of market evidence that the demand / need for a specific dwelling size is lower than the target. Details of the intended occupation/tenure, if different from the standard private apartment supply should be clearly clarified in the housing mix report, for consideration by the Planning Authority.
5. At application stage, the applicant shall provide a specific planning assessment of how the proposed development will impact on the residential amenity of the local area surrounding the site and in particular the existing neighbouring residential dwellings along Pearse Road and Kinsale Road. All potential impacts such as impacts on amenity, impacts on privacy/overlooking, impacts on daylight supply/overshadowing, potential overbearance, impacts at both construction and operational phases of the proposed development shall be set out for

consideration by the Planning Authority. To minimise and/or alleviate any negative impacts on local residential amenity, revisions to the proposed development may be required.

6. Further detail required in relation to the contaminated land element of this project – no information has been provided to date. It is noted remediation works are ongoing.
  - (a) Due to the former industrial use of the area, there is a possibility that the site is contaminated. It shall be required prior to the submission of the planning application that developer engages the services of a recognised environmental consultant with experience in the field of Land contamination to: i) Carry out a site investigation from a land contamination view point; ii) Carry out a risk assessment; iii) Recommend remedial measures; and iv) Prepare a report containing all of the above in the standard format. This report shall be submitted to the local authority for its written approval before commencement of the development. (Please note point 4 Environment Report. For further details see Appendix C)

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 the above.***

1. The applicant is requested to reconsider the configuration of the bike shed on the northeast corner of the site (Block 1), there are concerns regarding overbearance / overshadowing of the neighbouring dwelling to the northeast given its height and proximity to the boundary. In addition, the application is requested to provide a section showing the relation between Block 1 and the neighbouring dwelling to the northeast.
2. The applicant is requested to provide further consideration ensure that there is no potential for overlooking impacts on existing neighbouring residential properties. Measures such as the use of privacy boxes (or any mitigation measure deemed effective) on upper floor windows of the northeastern elevation of Block 1, Pearce Road, and Block 4, Kinsale Road or any other upper floor window that may amount to potential overlooking of nearby residential dwellings.
3. The applicant is requested to submit Sunlight and Daylight Access Analysis indicating compliance with the BRE guidelines, 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', having regard to the worst-case scenario for the ground floor apartments inter alia, rooms with no direct sunlight or limited access to sunlight.
4. The applicant is requested to submit a Daylight, Sunlight and Overshadowing (DSO) analysis to assess the impact of the proposed development on the amenity areas of neighbouring residential properties where applicable.
5. The applicant is requested to clearly set out how each of the proposed residential units on site would comply with all of the required minimum floor areas and standards that are set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities December 2022 (updated) and Quality Housing for Sustainable Communities 2007.

6. The applicant is requested to provide details of the proposed boundary treatment for the entirety of the site to include proposed materials, heights and planting where applicable.
7. The applicant is requested to provide updated details of all external finishes to include materials and colours schemes.
8. The applicant is requested to provide details of the proposed signage for all commercial elements of the scheme. This should include: A cross section of proposed signage, the size (length, depth, width) font and proposed materials and finishes, details and dimensions of all other apparatus required to illuminate and fix the signage to the building façade, details of the level of illumination proposed.
9. The applicant is requested to submit screening reports for Environmental Impact Assessment & Appropriate Assessment.
10. The applicant is requested to clarify the housing tenure for the proposed scheme.
11. There are concerns regarding the elevational treatment and articulation of materials along Pearce Road with specific reference to the protruding fibre cement / stone cladding elements that result in an over emphasis on the verticality and scale of Blocks 1 and 2. The applicant is requested to reconsider this approach and update plans accordingly.
12. Regarding Block 4 at the junction with Kinsale Rd where it meets the pedestrian street. There is a further emphasis in the height of the corner block. Furthermore, the aluminium cladding, appears at odds with the predominantly brick and render finishes elsewhere. Similar to point 1 above, it is considered that the Blocks facing the existing public roads and adjacent housing would benefit from a more context appropriate scale in terms of material and articulation. The applicant is requested to reconsider this approach and update plans accordingly.
13. It is considered that the verticality of the peripheral blocks should be reconsidered with respect to the elevations design and massing etc. Block 4 may also benefit from a distinction between the Ground Floor retail and upper levels residential uses via the deployment of a ground floor 'plinth' elevational treatment similar to the approach used in Block 3.
14. The applicant is requested to address the relationship between Block 3 and existing low-density housing to Pearse and Kinsale Roads respectively with regard the potential for overlooking and impacts on privacy.
15. Secure surface level bike storage has been addressed more broadly across the scheme which is welcomed in principle. Regarding the main east-west cycle / pedestrian route the omission of Part M ramps via deployment of 1:21 gradient is welcomed in reducing handrails and visual clutter. It is acknowledged the potential issues raised re. creating speed ramps via the main pedestrian / cycle route however consideration should be given to a more direct cycling route, if possible, in conjunction with the meandering ramps and/or include bicycle wheel channel adjacent to the stepped sections.

16. It is requested that further daylight and wind analysis is undertaken regarding the proposed tall building, Block 3.
17. Section 4.10 to 4.13 of Design Standards for New Apartments apply, in particular:  
4.13...Children's play needs around apartment buildings should be catered for:  
*(a) 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; &*  
*(b) 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.*  
*(c) More detailed design of the proposed external play and amenity areas directly adjacent / linked to the proposed Apt. blocks should be provided.*  
(For points 11-17 above, please refer to internal City Architects Report in Appendix C).
18. It is noted that the applicant has made a Pre-Connection Enquiry to Uisce Eireann. As this in an LRD application, the Applicant will need to engage further with UÉ prior to submitting the planning application. The Applicant will need to submit full and final designs to UÉ for review and approval. Once UÉ are satisfied with the design, they will issue a Statement of Design Acceptance. A copy of this statement along with the full design will be required to be submitted with the Planning Application.
19. The proposed drainage strategy is not acceptable for taking in charge due to the proposed attenuation tanks. However, if it is not intended for the development to be taken in charge, the proposed drainage strategy is acceptable. Please clarify the intention with respect to Taking in charge in the formal application.  
**(a)** The Applicant has shown a proposed storm sewer from the site along Kinsale Road connecting into an existing storm sewer. This is shown within the red line boundary, but no letter of consent was included in the (submission). A letter of consent from CCC may have to be included with the formal application.  
**(b)** Prior to submitting the formal application, please engage with the Drainage Section to agree the requirements for the proposed storm sewer. This will include picking up all existing surface water gullies which currently connect to the combined sewer.  
(For points 18-19 above, please refer to internal Drainage Report in Appendix C).
20. Design Considerations for the Landscaping of Open Spaces are required to be submitted at application stage:  
**(a)** The planting regime within the open spaces to follow the All-Ireland Pollinator Plan 2021-2025. A detailed design to be submitted to the Planning Authority and reviewed by Senior Parks & Landscape Officer/ Biodiversity Officer.  
**(b)** The lighting plan for the development to be adapted to be friendly towards nocturnal wildlife. The guidance notes by Bat Conservation Trust on Bats and Artificial Lighting at Night, 08/2023 to be followed.
21. Surveys and Management Plans to be submitted at application stage:

- (a)** Invasive Alien Plant Species survey and potential management plan to be developed and implemented if any IAPS were found within the proposed development boundary.
- (b)** A bat surveys to be conducted on preliminary roost locations within the current buildings on site, dawn & dusk activity surveys and static detector surveys and analysis of bat activity on site. These bat surveys are to locate potential bat roosts, the suitability of the current infrastructure on site for bat roosts and the highlight the bat activity on site as well.  
(For points 20-21 above, please refer to internal Biodiversity Officer's Report in Appendix C).

22. Construction Environmental Management Plan to be submitted at application stage:
- (a)** Further detail required in relation of contaminated land and handover from ongoing remediation works permitted under planning reference 2442868. Details on any further mitigation measures or monitoring to be outlined.
  - (b)** Further detail required in relation to piling. Bored piling as opposed to percussive piling shall be prioritised for the construction process.
  - (c)** Further detail required in relation to asbestos management process.
  - (d)** Further detail required in relation to the proposed dust minimisation plan on nearby residential properties.
  - (e)** Further detail required in relation to noise and vibration monitoring locations. CEMP to align with mitigation measures outlined in requested Noise Impact Assessment.
  - (f)** In relation to 5mm/sec peak vibration limit suggested in Section 12.3, outline within final report how this complies with British Standard BS 5228-2:2009: Code of practice for noise and vibration control on construction and open sites.
  - (g)** Further detail in relation to site/security lighting during construction to be outlined and measures that will be put in place to mitigate and nuisance at nearby receptors.
  - (h)** Working hours to be listed within CEMP as: "Working hours during site clearance and construction shall be restricted to 0800-1800 hours on Mondays to Fridays and to 0800-1600 hours on Saturdays. Activities outside these hours shall require the prior approval of the Planning Authority."

23. Construction and Demolition Resource Waste Management Plan to be submitted at application stage:
- (a)** Reference is made to an Outline Construction Waste Management Plan in the CEMP. This has not yet been provided for review.
  - (b)** The developer is requested to prepare a Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021) including demonstration of proposals to adhere to best practice and protocols.
  - (c)** The RWMP to include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

24. Operational Waste Management Plan to be submitted at application stage:
- (a)** The information provided in the Operational Waste Management Plan is sufficient at this point.

**(b)** All bin storage drawings to be submitted in appendix of the Operational Waste Management Plan.

25. Swept Path Drawing for Refuse Vehicle to be submitted at application stage:

**(a)** It is not clear if a refuse vehicle can enter and turn at all of the collection areas within the development. A swept path analysis of a refuse vehicle would be required for all collection points within the site - including Apartment Block 1 and Block 2. Or further detail should be included on the collection process from apartment blocks 1 and 2.

26. Noise Impact Assessment to be submitted at application stage:

**(a)** Both an inward and outward noise impact assessment required. To show the impact of the development during construction and operation on the surrounding receptors.

**(b)** Assessment to also show potential impact of surrounding environment and existing road network on noise levels within the development amenity area, balconies and within the apartments themselves.

**(c)** Consideration of noise generated from mechanical plant such as heat pumps to be factored in as well as noise generated from bin storage areas, substation, plant rooms, creche and cafe. Any proposed mitigation measures to reduce the noise impact from these areas shall be included within the report. Reference should be made to acceptable noise levels from proposed mechanical equipment to ensure no nuisance on properties once installed, a data sheet of the proposed equipment or similar should be provided. Particular attention should be paid to apartments above, below or adjacent to the above-mentioned areas.

27. Energy & Climate Action Statement to be submitted at application stage:

**(a)** The information provided in relation to Energy and Climate Strategy within the Scheme Sustainability Statement is sufficient at this point. The noise specification for mechanical equipment outlined in Noise Impact Assessment should be factored into selection of future mechanical equipment.

(For points 22-27 above, please refer to internal Environment Report in Appendix C).

28. Applicant to contact National Transport Authority (NTA) to ensure requirements for NTA's Bus Connects Cork STC H- Kinsale Road to City measures in the vicinity of their site are included in their application.

(For point 28 above, please refer to internal Infrastructure Report in Appendix C).

29. Landscaping Plan to be submitted at application stage:

**(a)** Cross Sections of all open spaces– especially the pedestrian access from Pearse Road into the development.

**(b)** The maintenance and long-term management of all open spaces needs to be included for review.

**(c)** The interface between the Communal Open Space and the Public Open is space is unclear, and will need to be clarified – is the boundary fencing, a solid wall.

**(d)** The Apartment block on Pearse Road which bound the Public open space – how is this secured from the public open space.



- (e)** There is no mention of play provision in the communal area, as outline in Sustainable Urban Housing: Design Standards for New Apartments – this needs to be addressed.
- (f)** Full landscape drawings will be required for review.

30. While Sustainable Urban Drainage Systems (SUDS) and Nature Based Solutions (NBS) are mentioned in the submitted documentation – there should be scope in the larger open spaces to incorporate Nature Based Solutions. Information to be provide to include – to scale drawings including sq. metres of each SUD feature, Cross sections, Depth of soil / Soil types used, make up of soil structure for the depth of the SUDs feature, planting details , and maintenance and management plans.
  
31. The development of public open space over structures, such as underground car parks, is also becoming more frequent. In these cases the design and structural loading capabilities of the subsurface structures require an integrated approach with the open space proposals above. In all cases the provision of a fully designed public open space with required recreational facilities shall not be compromised. The future maintenance responsibility of such provisions, if taken in charge by the City Council, will require clear delineation vertically both in drawings and physically within the development.
  
32. The interface of the Apartment blocks and the public domain on Pearse Road is requested to be softened with landscaping.  
(For points 29-32 above, please refer to internal Parks Report in Appendix C).
  
33. Car Parking Provision to be submitted at application stage:
  - (a)** The applicant is requested to ensure that all vehicular parking spaces are equipped with appropriate infrastructure (ducting) to allow for future fit out of a charging point.
  - (b)** It is unclear if service delivery to the retail units has been considered. Adequate or designated space(s) should be provided within the car park to accommodate delivery vehicles and prevent illegal parking resulting dangerous situations both in the car park area and on the public road.
  
34. Traffic and Transportation Assessment to be submitted at application stage:
  - (a)** The input data and associated findings with respect to the submitted transport assessment are generally acceptable and no further clarification is required but applicant to ensure all information is up to date as discussed in LRD Opinion meeting.
  
35. Public Lighting details to be submitted at application stage:
  - (a)** The scope of the public lighting (PL) requirements associated with the proposed development including temporary lighting associated with the demolition/construction phase shall be agreed with the PL department of Cork City Council prior to commencement of development.
  - (b)** PL designs shall be submitted to the PL department of Cork City Council through [its@corkcity.ie](mailto:its@corkcity.ie). PL designs shall be agreed with and signed off in writing by the PL department prior to commencement of development.

- (c) The lighting design shall cover both the internal public lighting within the development and the public lighting along the curtilage/approach roads to the development.
- (d) The PL design shall be made up of a design calculation and a public lighting drawing. The PL drawing shall outline the column type/height, access chamber size/location, ducting route/size and customer service pillar locations as a minimum.
- (e) The public lighting design calculation shall be carried out using Lighting Reality software.
- (f) Public lighting designs shall comply with the latest version of the Cork City Council Exterior Public Lighting Design Requirements Document, a copy of which is available on [www.corkcity.ie](http://www.corkcity.ie).
- (g) These works are to be undertaken and paid for by the applicant.

36. Road Safety details to be submitted at application stage:

- (a) No Road Safety Assessment (RSA) was submitted as part of the Opinion Stage application.
- (b) An Road Safety Assessment is required for the proposed permanent vehicular entrances onto the Kinsale Road and Pearse Road.
- (c) If an alternative temporary vehicular entrance is proposed, an Road Safety Assessment is required for this entrance also.

37. Documents to be included in the application:

- (a) Traffic & Transportation Assessment in full words
- (b) Road Safety Audits
- (c) Swept path analysis for fire tender/refuse trucks.
- (d) Lighting Design

(For points 33-37 above, please refer to internal Traffic Regulation & Safety Report in Appendix C).

38. Applicant to advise of cross section of Kinsale Road with proposed development. Cross Section requires to adhere to DMURS guidance. Verge must include in-situ tree planting.

- (a) Applicant to advise of pedestrian access to the rear of retail store located on Kinsale Road for the residents to utilise.
- (b) Applicant to advise of measure to clearly indicate access is only for pedestrians and measure to only allow 'Fire Tender Access' in the event of an emergency, Kinsale Road.
- (c) Applicant to remove 'break' in grass/tree verge on Pearse Road to the east of ramp to basement car parking.

(For point 38 above, please refer to internal Urban Roads & Street Design Report in Appendix C).

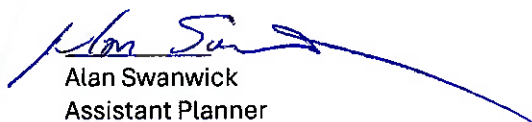
39. The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals with specific consideration given to the details provided in the Cork City Childcare Report.

(For point 39 above, please refer to Cork City Childcare Report in Appendix D).


40. Letter of consent from all affected landowner(s), dated not more than 6 months before the lodgement of the planning application, is required to be provided.

**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.



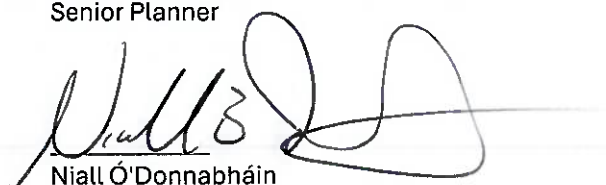
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