



PLANNING STATEMENT OF CONSISTENCY

PROPOSED STRATEGIC HOUSING DEVELOPMENT AT FORMER ST. KEVIN'S HOSPITAL AND GROUNDS, SHANAKIEL, CORK



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1.0 INTRODUCTION

The Land Development Agency is seeking permission for residential development on a 5.7 ha site on lands located in the north-western part of the Cork City. The site, the Former St. Kevin's Hospital and Grounds, Shanakiel, Cork is bounded to the south by well-established residential developments along the Lee Road, to the west by Atkin's Hall Apartments, to north-west by a local road serving the Beechview housing estate and to the north-east by Ashboro housing estate.

The site is irregular in shape, extending north to south along a steep slope towards the River Lee. The overall site has an area of 5.7 hectares, with c. 4.21 of this calculated as being developable. The site has historically been part of a wider institutional development, the Our Lady's Hospital complex. Due to the architectural quality of the main structure on site, the former St. Kevin's Asylum, is a listed building (RPS Ref. PS620). Currently, the site is abandoned and, due to a 2017 fire, the protected structure is a serious state of disrepair.

This significant regeneration project, with a total gross floor area of c 24,344 sq m, will provide 266 no. residential units, a crèche and office enterprise centre. The development will consist of 46 no. town houses (32 no. 3 bedroom units and 14 no. 4 bedroom units) arranged in 11 no. two storey blocks; 54 no. ground floor 2 bedroom duplex apartments and 36 no. 3 bedroom and 18 no. 4 bedroom duplex townhouses above arranged in 7 no. three storey blocks; 52 no. walk-up apartments (11 no. 1 bedroom apartments and 41 no. 2 bedroom apartments) arranged in 3 no. four storey blocks. The development will also include the conversion and renovation of the former St. Kevin's Hospital building to provide 60 no. apartments (26 no. 1 bedroom and 34 no. 2 bedroom apartments) and a 440 sq m crèche at ground floor level, with ancillary outdoor play area.

The development also includes the conversion of the 630 sq m former chapel building to provide a new Office Enterprise Centre. The proposed development will include 241 no. surface car parking spaces and 563 no. bicycle parking spaces.

The site has the following land use zoning designations under the *Cork City Development Plan 2015-2021*;

- Zoning Objective 4 - Residential, Local Services and Institutional Uses zoning is designed to "*protect and provide for residential uses, local services, institutional uses, and civic uses, having regard to employment policies outlines in Chapter 3.*" (CCDP 2015-2022, pg. 226.) '*Residential*' development is a permissible use under this objective and
- The site also comprises a section of zoning designation '*Landscape Preservation Zones*' to the south. The objective of this zoning, which is contained to the southern extremes of the site, is to "*preserve and enhance the special landscape and visual character of landscape preservation zones*". The entire site is considered to be an area of high landscape value.

The subject lands, which will accommodate significant new public open space are sufficiently large to accommodate a well-designed higher density residential development, without giving rise to any adverse impacts on existing residential amenities. The site benefits from extant structures, which are deemed to be of high preservation value and individual character.



Thus, it is considered that given the site's locational characteristics, residential development will inherently accord with National and Regional sustainable planning principles particularly in relation to the promotion of more compact and efficient forms of urban development in appropriate locations.

This document seeks to outline the site's inherent compliance with the relevant suite of National, Regional and Local Development Plan planning guidance policies and objectives pertaining to residential development in the Cork City area as required in respect of development proposals being submitted under the Strategic Housing Development (SHD) planning provisions.

1.1 Legislative Context

In accordance with Section 4 of the Planning and Development (Housing) and Residential Tenancies Act, 2016, The Land Development Agency is seeking planning permission from An Bord Pleanála, in respect of proposed Strategic Housing Development (SHD) as outlined above. The subject report constitutes the Statement of Consistency in accordance with the requirements of Section (5)(b) of the Act.

1.2 Report Outline

This Statement of Consistency provides a description of the proposed development (see above) followed by a list of the various statutory and strategic policy documents considered.

Section 2 outlines national-level policy, encompassing the provisions of *Project Ireland 2040* and various planning and development guidelines published by the Department of Housing, Planning and Local Government, and the relevant Minister. Section 3 focuses on regional planning policy of the Southern Region and Cork County. Finally, Cork City Council's local planning policy is detailed in Section 4.

The Statement demonstrates consistency with the pertinent *Development Plan* (i.e. the *Cork City Council Development Plan 2015-2021*, and all relevant Section 28 National Guidelines as required under Section (5)(b)(i) & (ii) of the Act and should be read in conjunction with the enclosed Material Contravention Statement, prepared by Tom Phillips + Associates. The objectives of the broader national and regional plans as they relate to the proposed development are also considered in the Statement.



Policy Documents Considered

The following policy documents have informed this Statement of Consistency:

1. *National Planning Framework (Ireland 2040 – Our Plan);*
2. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016);*
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009);*
4. *Urban Design Manual: A Best Practice Guide (2009);*
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018);*
6. *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018);*
7. *Childcare Facility Guidelines (2001);*
8. *Part V of the Planning and Development Act 2000: Guidelines (2017);*
9. *Design Manual for Urban Roads and Streets (DMURS) (2013);*
10. *The Planning System and Flood Risk Management (2009);*
11. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009);*
12. *Architectural Heritage Protection – Guidelines for Planning Authorities (2011);*
13. *Climate Action Plan (2019);*
14. *Southern Regional Assembly: Regional Spatial & Economic Strategy (January 2020);*
15. *Cork Metropolitan Area Draft Transport Strategy 2040;*
16. *Cork Area Strategic Plan 2001-2020; and*
17. *Cork City Development Plan (2015-2021).*

The proposed development of the subject site for residential purposes is deemed to inherently accord with the overarching policies and objectives of the Southern Assembly's recently adopted *Regional Spatial and Economic Strategy (2020)*, and the *National Planning Framework*, as part of *Project Ireland 2040*, regarding the increased densification of the Cork City Region.



In terms of residential density, the Applicant has also afforded full regard to the provisions of the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)* and the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*.

2.0 NATIONAL POLICY

2.1 *National Planning Framework (Ireland 2040 – Our Plan)*

The *National Planning Framework (NPF)*, published in February 2018, sets out a strategic development framework for Ireland over the period to 2040. The NPF is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040. The Framework focuses on:

- Growing regions, their cities, towns and villages and rural fabric;
- Building more accessible urban centres of scale;
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.

As a strategic development framework, the Plan sets the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. *Project Ireland 2040* will be followed and underpinned by supporting policies and actions at sectoral, regional and local levels.

A recurring theme in the *Framework* is the requirement to facilitate balanced development throughout all regions of Ireland, and particularly, to accommodate significant growth in Ireland's cities other than Dublin. Specifically, the NPF supports future growth of at least 50% for Cork to 2040. The positioning of the cities of the Southern Region, including Cork, as '*significantly scaled, compact and attractive*' will encourage their growth as effective complements to the current primacy of Dublin. The importance of '*addressing the long-term decline of [Cork] City's urban population*' is highlighted, with the provision of '*ambitious, large-scale*' housing regeneration within the city's built-up area cited as being central to this goal. Under the heading of 'Compact Growth', the NPF is:

'Targeting a greater proportion (40%) of future housing development to happen within and close to existing built-up areas. Making better use of under-utilised land, including 'infill' and 'brownfield' and publicly owned sites together with higher housing and jobs densities, better serviced by existing facilities and public transport'. [Our Emphasis]

Another central theme in the *Framework* is the requirement to ensure that the future growth of cities occur within established urban footprints. Well-designed, compact development is considered to improve quality of life for residents, increase returns on investment in infrastructure, and ameliorate environmental impacts of urbanisation.



National Policy Objective (NPO) 3b imposes a target of at least 50% of future urban development on infill/brownfield development sites within the built envelope of existing urban areas, including Cork City. This is applicable to all scales of settlement, from the largest city, to the smallest village.

The NPF further notes in *National Policy Objective 10*:

‘There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth’.

It states that the key test is meeting appropriate planning standards, which should be performance-based to ensure well-designed, high quality outcomes, rather than absolute in all cases. Although sometimes necessary to safeguard against poor quality design, the NPF notes that planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes.

Comment: The subject development inherently complies with the overarching themes of the *National Planning Framework*, by proposing a compact well-designed sustainable form of residential development on an existing brownfield, zoned, urban site located in close proximity to public transport services and a well-established social infrastructure that will contribute to the consolidation of Cork City.

2.2 *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*

Rebuilding Ireland was launched in 2016 with the aim of addressing ongoing supply issues for residential accommodation in Ireland. The overarching aim of the *Action Plan* is to increase the delivery of housing from its current undersupply across all tenures and to help individuals and families meet their housing needs.

The Action Plan provides a target to double the number of residential dwellings delivered annually by the construction sector and to provide 47,000 social housing units in the period up to 2021. The importance of land supply and location is a central consideration of the *Action Plan* which states that:

“Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.” [Our Emphasis]



Figure 2.1: Five Pillars of the Action Plan. Source: *Rebuilding Ireland: Action Plan for Housing and Homelessness*, 2016. Extracted by TPA, 2020.

The proposed development is located on zoned, serviced lands within walking distance of a range of amenities and services and will deliver 266 no. units in the coming years. The development is proximate to existing residential areas and employment opportunities, which is in line with the provisions of the *Action Plan*.

The *Action Plan* provides five key Pillars, which will support a range of actions to support the increased delivery of housing. The proposed development will directly respond to Pillars 2 and 3 of the *Action Plan*, which seek to, respectively, '*accelerate the delivery of social housing*' and '*build more homes*.'

Pillar 3 of the *Action Plan* seeks to '*build more homes*' in order to meet ongoing demand.

Pillar 4 of the *Action Plan* has the objective to improve the rental sector and Pillar 5 relates to utilisation of existing housing stock.

Comment: The proposed development of 266 no. units will provide a wide mix of unit types, including apartments, duplexes and townhouses. It is envisaged that this unit mix will be suitable for a range of household types and needs.

The proposed development is subject to the requirements of the *Part V of the Planning and Development Act 2000 (as amended)*. Social housing provision requirements have been discussed and agreed with the Housing Directorate in Cork City Council and details of this are appended to the *SHD Application Form*.

In addition, the scheme will assist in achieving the objectives outlined in Pillar 4, as it is envisaged that cost rental accommodation will form part of the overall tenure mix. The proposed scheme does not include any existing housing stock in habitable condition, so Pillar 5 is also not applicable in this instance.



2.3 ***Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) – Guidelines for Planning Authorities (2009)***

The Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, (2009) and its associated document *Urban Design Manual – A Best Practice Guide (2009)* illustrate essential criteria for sustainable urban residential development and describes how a scheme can integrate seamlessly into a site, having regard to its surroundings and thus presenting the best possible residential design scheme.

These *Guidelines* provide national guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question. Section 5.7 identifies ‘*brownfield*’ sites within city or town centres, including former hospitals, as sites of significant redevelopment potential at increased densities. In this regard, it is considered that the subject lands, which largely comprises of “*Residential, Local Services and Institutional Uses*” zoning, and which encompass a disused hospital facility, accords with the with the brownfield characteristic, and are thus suitable for an appropriate quantum of residential redevelopment.

Regarding public transport corridors and residential density, Section 5.8 of the *Guidelines* states;

“Walking distances from public transport nodes (e.g., stations/halts/bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1 km of a light rail stop or rail station. The capacity of public transport (e.g., the number of train services during peak house) should also be taken into consideration in considering appropriate densities.”

The subject site is currently served by 5 different bus routes, with corresponding bus stops located less than 500 m from the centre of the site. For prospective residents of the subject proposal, these transit options ensure a significant level of sustainable connectivity with Cork City and environs, as well as providing access to Cork Kent Train Station and Cork Airport.

Section 5.9 of the *Guidelines* states the following regarding density of *Infill Residential Development*;

“Potential sites may range from small gap infill, unused or derelict land and back land areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.

The design approach should be based on recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.”



Comment: In this respect, a number of Reports have been produced by Design Team members to address the various contributions of the subject proposal to the wider townscape. An *Architectural Design Statement*, prepared by Reddy Architecture + Urbanism states;

“A critical element to the success of modern residential developments is the quality of place making. This proposal sets a number of character areas that are linked by pedestrian linkages that allow the residents a number of communal experiences such as woodland, historical terraces, meadow, play courts, play grounds and hard landscaped home zones where children can play. The linkages are also attractive places in themselves, as they consist of landscaped walks. There is a central pedestrian spine that runs north south through the development that is made up of steps and terraces that take advantage of the sloping topography and views and this walkway contributes to the sense of place for the development...”

The St Kevin’s Hospital site is a highly visible and important site in terms of viewpoints from the river and other vantage points. Cork City has a unique visual language of elevated cityscapes on ridges overlooking the plain of the city and the riverine environment. This topography presents elevations of houses and institutional buildings in a hierarchy whereby street frontages are visually stacked above one another presenting a unified appearance.

The design intent is to ensure the St Kevin’s Hospital provides the iconic structure on the skyline and the residential elevations are subordinate to this protected structure.

Variety of materials and form will be important to break down the potential of a monolithic appearance to the ridge and this can be achieved by taking examples from the immediate residential forms along the river and the Sunday’s Well & Shanakiel Ridge, as well as the Montenotte Ridge overlooking the city centre.

The proposal will be a contemporary, and also contextual, architecture that will take its design cues from the brickwork of the St Kevin’s Hospital and the old Waterworks (now Innovation Hub) building below the site and also the use of plaster and slate that is the language of the Cork City ridge architecture.

We also note the fenestration pattern of vertically orientated opes punched into plastered masonry walls that step with the topography of the existing city ridges and this approach will inform the contextual elevations that will be present the scheme to the wider city and riverine context.”

A *Landscape Masterplan Report* for the entire landholding has been prepared by Aecom and is enclosed. The Report states;

“The starting point of the proposed intervention has been to assess the quality of the receiving environment. The remnants of the historic demesne, namely the tree stands and landscape garden features, were assessed for retention to form the framework of the open space intervention. From this the team have sought to create a central armature through the master plan which can become an active spine for pedestrians to traverse the site and interlink that variety of open spaces and perpendicular links. This will provide the framework for a variety of functions and amenity while creating a permeable network for the end users...”



The development of distinct character areas across the scheme will be central to the programming and selection of hard and soft materials within public open spaces and along with the streets capes within this new residential community. These character areas function as part of a site-wide landscape architectural framework aim to create suitable screening, visual and aesthetic interest while integrating of the proposed development into its adjoining environs...

The overarching design intention is to create of a strong sense of place and identity for this new residential community, whilst also respecting the historic sensitivities and visibility of the site."

In our opinion, the proposed development – in terms of both design and density achieved – is appropriate in this location. This is due, *inter alia*, to the close proximity of public transport provision, the surrounding urban context, and the currently underutilised, brownfield nature of the subject site. Providing a net residential density of c. 63 dph, the development proposal achieves a moderately high-density residential scheme of high quality design. The residential density of this development is considered compliant, appropriate and sustainable.

2.4 *Urban Design Manual: A Best Practice Guide (2009) (A companion document to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas)*

The above referenced *Design Manual* notes 12 no. criteria that should be used to facilitate assessment of planning applications and should, therefore, be used as a guide to steer best design practice for residential proposals. The figure below illustrates how the 12 no. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted i.e., not moving onto matters of detail until the important structural decisions have been taken.

The 12 no. criteria are subdivided into three categories: Neighbourhood, Site and Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process. In short, the proposal's response to the various criteria set out by the *Guidelines* may be summarised as follows:



Figure 2.2: Urban Design 12 Criteria. (Source: *Urban Design Manual*, 2009. Extracted by TPA, 2020.)

Context

The proposed development has been designed to positively respond to the neighbouring properties of the site, the natural topography and the provisions of the *Cork City Development Plan (2015-2021)*. Please refer to enclosed *Architectural Design Statement* and *Landscape Design Statement*. Both of these Reports outline in great detail how the surrounding, existing context was considered during the iterative design approach to the proposed scheme.

Connections

As outlined above, the proposals provide new pedestrian and cycle links to the development, connecting to wider north-west suburban area. The main vehicular access point is to be upgraded at Beechtree Avenue. A series of new pedestrian pathways within the scheme will also further improve permeability. The scheme also makes provision for connections through the adjoining Atkins Hall development, as well as Rose Hill Upper to the east. This will further assist with pedestrian permeability.

Inclusivity

The proposed development provides a range of residential unit types (apartment), as outlined in Section 4.1.6 of this Statement, which will cater for a range household types and tenures to meet the needs and requirements of all sectors of the community. Provision of Part V housing has been agreed with the Local Authority, subject to planning permission.

The design of the scheme ensures that the residential elements are fully accessible for people with disabilities. All elements of the scheme fully comply with Part M of the *Building Regulations*. There is a range of communal and private amenity spaces and facilities for children of different ages, parents and the elderly. Own-door, ground floor units have been provided in the development. Disabled car parking provision is also provided in the development. High-quality, functional public open space is provided for at strategic locations throughout the development.

Variety

As stated above, a mix of housing types and sizes is proposed to cater for a variety of housing needs and create a strong and sustainable mixed community.

Figure 2.3: Breakdown of Residential Units by No. of Bedrooms		
Type	No.	%
1 Bed	37	14%
2 Bed	129	48%
3 Bed	68	26%
4 Bed	32	12%
Total	266	100%

Figure 2.4: Breakdown of Residential Units by Type			
	Apartments	Townhouses	Duplexes
1 Bed	37	0	0
2 Bed	75	0	54
3 Bed	0	32	36
4 Bed	0	14	18
Total	112	46	108
	42%	17%	41%

Source: Reddy Architecture + Urbanism, November 2020.

Efficiency

The proposal will connect to and make most efficient use of existing services and infrastructure. As stated above, this application will have a residential density of c. 63 No. units per hectare. We contend that this an efficient and sustainable use of the underutilised, brownfield and appropriately zoned lands and supports both the *National Planning Framework* and *Regional Spatial and Economic Strategy* objectives to consolidate development in Cork City.

Distinctiveness

The subject development is designed to respect the established built form of the north-western suburbs, and the specific topography of the site. The design also responds to both National and Development Plan policies and guidance that explicitly require the more efficient use of zoned serviced urban lands in Cork.



The proposed architectural design seeks to reflect this as noted in the enclosed *Architectural Design Statement*. The proposed landscaping scheme, as prepared by Aecom, will ensure that the proposal assimilates well into its surroundings.

As outlined above, the application also seeks to provide for increased pedestrian and cyclist permeability within the new development. The proposed layout utilises the existing context and derelict, former institutional buildings to create a more integrated scheme, thus creating a sense of place.

Layout

The scheme layout will facilitate viewpoints, pedestrian desire lines and encourage pedestrian movements. The layout also provides for a new landscaped public open space, at accessible locations. Traffic speeds are controlled by design and layout and the scheme is fully DMURS compliant, which is outlined further in Section 2.9 of this Statement and in the enclosed DMURS Statement prepared by ILTP Consulting (appended to the SHD Application Form.)

Public Realm

Public open space is appropriately located in the scheme and is fully accessible for all residents and visitors, all open space areas are overlooked to provide natural surveillance.

Adaptability

It is considered that all apartment types proposed in this application are designed to be adaptable and capable of catering for cross-generational use.

Privacy & Amenity

Almost all units enjoy dedicated and generous private open space provision (balconies, gardens and terraces etc.), which are not unduly overlooked. Furthermore, as a result of adequate setbacks between the proposed units and existing blocks, no adverse overlooking or overshadowing of adjoining development or within the scheme will arise as a result of the development. Private open space is not provided in the former St. Kevin's Hospital block due to the restoration of a Protected Structure, however this is deemed to be acceptable when considering the ample public open space provision in the proposed scheme.

Parking

It is proposed to provide 241 no. car parking spaces for the 266 no. proposed residential units and other uses on site. The *Development Plan* standards include for 1 no. dedicated car parking space per residential unit, with one or two bedrooms and also include for 2 no. dedicated car parking spaces per residential unit with three or more bedrooms.



As shown in Table 5.1 of the *Traffic and Transport Assessment and Mobility Management Report*, prepared by ILTP Consulting, it is proposed that car parking for one and two apartments be 50% of the Development Plan standard. The proposal includes a car parking space to residential unit ratio of 0.5:1 for 1 bed and 2 bed apartments.

A total of 6 no. car parking spaces are proposed for the crèche, which provides for vehicular drop-off demand and staff parking. It is further proposed that only one dedicated car parking space will be allocated to duplexes or houses with two or more bedrooms, which is a 1:1 car parking space to residential unit ratio. It is currently proposed that visitor parking including Shared/GoCar provision be 5% of the proposed residential parking provision. It is proposed that 6 no. spaces be allocated to the Office Enterprise Centre. A total of 6 no. car parking spaces are also proposed for the creche, which provides for vehicular drop-off demand and staff parking. It is also proposed to include for 4 no. spaces for a Car Share/ GoCar scheme within the development. All car parking space will also be EV compatible, which will over time allow for EV only vehicles to be accommodated within the proposed development. To support the proposed reduction in carparking numbers below CDP standards a *Mobility Management Plan* has been prepared, which sets out details of support mechanisms that will help promote sustainable travel in accordance with national, regional and local policy.

Detailed Design

The design of the proposal has been a collaborative effort from its inception, with the various opportunities and constraints assessed by the multidisciplinary design team (incorporating architectural, landscaping, engineering, environmental, conservation, heritage and planning expertise) in an iterative manner. The proposal has also been informed by the expert inputs of the various personnel to ensure that appropriate alleviation and avoidance measures are 'designed into' the scheme from the outset.

The layout has been expressly informed by the need to maximise amenity for future residents, whilst also protecting the amenity of the surrounding existing dwellings, and the extant landscape value. There been extensive Section 247 pre-application discussions with Cork City Council, as well as focused departmental discussions with planning, roads, drainage and parks departments. In addition, feedback received from An Bord Pleanála at the Tripartite Meeting with Cork City Council has been considered, culminating in the current proposal.

The stated aim of the *Quality Housing for Sustainable Communities, Best Practice Guidelines for Delivering Homes Sustaining Communities, 2007* is to:

"Identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant."

These Guidelines along with the *Development Plan* standards for housing have informed the design of the 266 no. units proposed in the scheme.

Reddy Architecture + Urbanism have enclosed a *Housing Quality Assessment* in relation to the proposed development, setting out key statistics including public and private open space provision for each residential unit type, unit sizes, heights, etc. This confirms that the proposals are compliant with the above *Guidelines* and *Development Plan* standards, as relevant.



Universal Design

In addition, it should be noted that the proposed scheme has been designed with the *Seven Principles of Universal Design* firmly in mind, to encourage access and use of the development regardless of age, size, ability or disability, as outlined in the National Disability Authority's "*Building for Everyone: A Universal Design Approach*" and "*Universal Design Guidelines for Homes in Ireland.*" These principles are as follows;

- *Principle 1: Equitable Use;*
- *Principle 2: Flexibility in Use;*
- *Principle 3: Simple and Intuitive Use;*
- *Principle 4: Perceptible Information;*
- *Principle 5: Tolerance for Error;*
- *Principle 6: Low Physical Effort;*
- *Principle 7: Size and Space for Approach and Use.*

This has been reinforced in a Preliminary Audit of the scheme, which has been undertaken to demonstrate compliance with *Part M of the Building Regulations* by O' Herlihy Access Consultants. The scheme will be further evaluated and tested against these requirements during Detail Design Stage.

An Application for a *Disability Access Certificate* to demonstrate compliance with *Part M of the Building Regulations*, will be made to the Local Authority in tandem with the lodgement of the *Fire Safety Certificate Application*.

2.5 *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018)*

These *Guidelines* seek to promote high density apartment development on residentially zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

The subject site accords in full with the locational characteristics deemed appropriate for this form of development in the *Guidelines* being located in a '*central and/or accessible urban location*' within walking distance (up to 15 minutes or 1,000 - 1,500m) of significant employment locations including hospitals and third level institutions. The site is also within easy walking distance to a high-frequency urban bus service.



The Guidelines also provide new apartment design standards that supersede Development Plan provisions in relation to:

- Apartment mix;
- Internal space standards
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartment to stair/lift ratios;
- Storage spaces;
- Amenity spaces including balconies and patios;
- Car parking, and
- Room dimensions.

Section 2.23 of the *Guidelines* note that publication of *The National Planning Framework (NPF)* has signalled a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high-quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in Development Plans, should be replaced by performance criteria, appropriate to location.

The site is located within a major employment node (Cork City), which employs c. 102,000 people (Census 2016), and is within easy walking distance of high frequency bus routes and a number of local employment centres. In such locations, there is no upper residential density limit. The proposed development comprising a density of c. 63 no. units per hectare is considered acceptable in line with the above Guidelines.

Compliance with the above noted quantitative design provisions has been achieved in this development. Full details in this regard are provided on the enclosed *Housing Quality Assessment* completed by Reddy Architecture + Urbanism.

It is considered that given the site's superb locational characteristics proximate to high quality bus services and an established social infrastructure, the proposed development will inherently accord with National and Regional sustainable planning principles particularly in relation to the promotion of more compact and efficient forms of urban development on brownfield sites and significantly increased residential densities in appropriate locations. This is in line with the NPF and the *2018 Apartment Design Guidelines*.



2.6 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The *Guidelines* were published in December 2018 on foot of the publication of the *National Planning Framework*. The aim of the *Guidelines* is to ensure that height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built up areas.

Comment: The proposed development, which includes the only 5 no. storey element at its highest point, the existing St. Kevin's Hospital Building to be restored, complies with the *Guidelines*. The proposed development provides for an appropriate residential density and has been designed to preserve and protect the residential amenity of future residents of the scheme, in addition to maintaining the existing residential amenity of adjoining residents. The overall proposed heights for development will range from 2-5 no. storeys.

2.7 Childcare Facilities – Guidelines for Planning Authorities 2001

The *Childcare Guidelines 2001* generally recommend the provision of childcare facilities for residential development with 75 no. units or more, albeit having regard to the existing geographical distribution of such facilities in the area and the emerging demographic profile of the area. In this case, a development of 266 no. units is being proposed which would suggest childcare provision is required.

Comment: A 440 sq m crèche, has been provided for at ground floor level of the development. A *Social Infrastructure Audit*, prepared by Tom Phillips + Associates, for the vicinity of the site has been completed and is enclosed with the application.

2.8 Part V of the Planning and Development Act 2000: Guidelines issued by the Minister for Housing, Planning, Community and Local Government under section 28 of the Planning and Development Act 2000 (2017)

This guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the *Guidelines*, which states:

“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”



Comment: The proposed development is subject to the requirements of the *Part V of the Planning and Development Act 2000 (as amended)*. Social housing provision requirements have been discussed with the Housing Department in Cork City Council.

The proposals consist of total 27 no. units, as follows -

- Duplexes – 4 no. 4 bed with 4 no. 2 bed below;
- Duplexes – 9 no. 3 bed with 9 no. 2 bed below;
- Duplex – 1 no. 2 bed (ground floor.)

Please refer to the enclosed Part V proposals, appended to the SHD Planning Form.

2.9 Design Manual for Urban Roads and Streets (DMURS) (2013)

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys. The manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach, and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

Comment: ILTP Consulting have prepared the enclosed *DMURS Compliance Statement*, which confirms that the proposed development is consistent with the principles and guidance of DMURS, insofar as this applies to residential schemes.

2.10 The Planning System and Flood Risk Management (2009)

The Office of Public Works (OPW) and the Department of Environment, Heritage and Local Government (DEHLG) published *The Planning System and Flood Risk Management Guidelines for Planning Authorities*, November 2009. The *Planning Guidelines* introduce the principle of a risk-based sequential approach to managing flood risk.

Comment: Barrett Mahony, Consulting Engineers prepared the enclosed *Site-Specific Flood Risk Assessment*, in accordance with the *Guidelines* and these confirm that all storm water details and related site-specific investigations provided will be to the satisfaction of both CCC and the Board, as required.

2.11 Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)

The Appropriate Assessment Guidance was published to guide compliance with the *Birds Directive, 1979* and the *Habitats Directive, 1992*.



Comment: Openfield Ecology were retained by the Applicant to provide *Appropriate Assessment Screening* in respect of the proposed development and is enclosed with this application. The *Appropriate Assessment Screening* concludes that a Stage 2 assessment is not required in respect of the proposed development.

It should be noted that a number of measures to alleviate impacts, prior to, during and post construction, are recommended by the Design team. These measures are not included to reduce or avoid any effect to a Natura 2000 site and are not mitigation in the context of Appropriate Assessment Screening

In addition, an *Ecology Impact Assessment* has been completed.

2.12 *Architectural Heritage Protection – Guidelines for Planning Authorities (2011)*

The Department for Arts, Heritage and the Gaeltacht produced these guidelines to aid the protection of built heritage deemed of special interest. The main hospital building on the subject site is a protected structure (Cork County Council RPS RPS Ref. PS620), albeit extensively damaged in a 2017 fire. There are a number of additional buildings and structures throughout the site, which have been assessed for architectural significance in the enclosed *Conservation Strategy and Method Statement*, prepared by John Cronin and Associates.

The *Guidelines* identify building ‘*endangerment*’ as when the protected building is ‘*exposed to harm, decay or damage*’. ‘*Immediate action*’ should be taken by the owner of an endangered protected structure to stabilize the building. In the instance of extreme damage by fire, wherein extensive demolition is necessary, the ‘*elements that contribute to the special interest that have survived should be retained in any reconstruction or repair*’. Façade retention is an acceptable solution in exceptional cases.

Comment: The respectful protection of extant heritage buildings on site has been central to the design team’s approach to the Former St. Kevin’s Hospital redevelopment. The *Conservation Strategy and Method Statement* prepared by John Cronin and Associates details the measures taken to preserve the surviving architectural features of merit, and integrate them respectfully into the redeveloped environment. An extract of this report is provided below:

“The proposed development site which formed part of the wider complex known as our Lady’s Hospital has been in a state of increasing dereliction since it was vacated in the early 2000s. The upstanding built fabric on the site has undergone further accelerated damage through antisocial behaviour and fire in recent years.

The opportunity brought by plans to develop residential accommodation both within and in place of existing historic institutional buildings will help to address the mixed legacy of social history represented by the upstanding structures on the site.

Subtle design detail has been incorporated in proposals to repurpose the key St Kevin’s building as a modern apartment structure in the heart of a vibrant educational and commercial quarter of Cork City. Proposals will result in the continued dominance of this iconic structure overlooking the river valley and western approach to the city and it will be combined with densely-grouped modern residential structures with more modest massing that corresponds with the terraced nature of the south-sloping site.



The existing balance provided by the red-brick former hospital building on the east side of the site's southern façade and the former chapel which survives and will be retained on the west side, will be retained in the proposed redevelopment.

Incidental items including the central section of the communication corridor which will be retained as a public realm feature over existing steps between levels. Masonry walls to be conserved to the east boundary of the site, around the historic Lower Reservoir and retaining the platform in front of the former St Kevin's building will also assist in reflecting the site's historic use in its modern reimagining."

In addition, an *Archaeological Assessment* has been prepared by Irish Archaeological Consultancy Ltd. This Assessment outlines that there are no recorded monuments or archaeological sites located within the proposed development area, with the closest recorded monument, a waterworks (CO074-056), located c. 43 m south of the site. No archaeological investigations have taken place within the proposed development area and the nearest archaeological works failed to identify any archaeological features or deposits.

The construction of the asylum and associated buildings across the proposed development area has resulted in significant disturbance to the existing ground surface and any potential archaeological remains that may have been present. However, there remains some limited potential for previously unknown archaeological features to survive on the site.

It is recommended that all ground disturbances associated with the proposed development be monitored by a suitably qualified archaeologist. If any features of archaeological potential are discovered during the course of the works further archaeological impact alleviation may be required, such as preservation in-situ or by record. Any further alleviation measures will require approval from the National Monuments Service of the DoCHG and Cork City Council Archaeologist. As such, the proposal is fully compliant with Ministerial Guidelines on the protection of architectural heritage.

2.13 Climate Action Plan (2019)

The *Governments Climate Action Plan* documents a broad spectrum of potential actions which can mitigate the effects of climate change as caused by pollution and the over-exploitation of natural resources. With regard to the built environment, these measures include the rational siting of urban development, the building of compact, dense and well-designed neighbourhoods, and the imposition of higher energy efficiency performance standards.

Energy efficiency performance is addressed primarily through the newly introduced *Near Zero Energy Building (NZEB)* standards, which apply to all homes built since 2019, as well as the traditional *Building Energy Rating (BER system)*.

In line with provisions contained within the *National Planning Framework*, detailed above, the *Climate Action Plan* maintains that circa 40% of new residential development to 2040 will occur within the environmental footprint of extant built-up areas. Such measures are considered to vastly reduce carbon emission associated with new developments, and promote an improved quality of life in Irish cities.



Comment: The proposed development addresses the issues of sustainability in a number of ways. The location of the site, as well as the moderately high density achieved, attest to the design team's cognisance of the importance of contributing to the continued compact development of Cork City. A quality residential scheme, which promotes linkages to the wider city through both pedestrian means and access to public transport, is provided for.

Several other documents enclosed with the planning application also outline sustainable design considerations. An *Energy Statement*, prepared by EDC, outlines the proposed energy conservation strategy for the residential properties at the proposed new development. The energy statement focuses on energy conservation and energy efficiency, in order to maximise the overall energy performance of the proposed development. Passive and active design measures are proposed including high insulation and air tightness standards for the building envelope, and energy-efficient mechanical, electrical and plumbing systems.

The *Mobility Management Plan*, prepared by ILTP Consulting outlines targets for sustainable commuting patterns for both residents and visitors to the scheme. The enclosed *Building Lifecycle Report* outlines sustainable technologies and building materials and finishes to be adopted in the scheme and the enclosed *Drainage Report*, prepared by Barrett Mahony Consulting Engineers includes details of proposed sustainable urban drainage systems proposed on site.

3.0 Regional Policy

3.1 Southern Regional Assembly: Regional Spatial & Economic Strategy (2020)

The *Regional Spatial & Economic Strategy (RSES)* was recently published by the Southern Regional Assembly (SRA), which is part of the regional tier of governance in Ireland. The Region covers 9 counties including Cork, with three sub-regions or *Strategic Planning Areas (SPAs)* including the *Cork Metropolitan SPA*. The RSES is a strategic plan that identifies regional assets, opportunities and pressures and provides policy responses in the form of Regional Policy Objectives. The main statutory purpose of the Strategy is to support the implementation of the NPF and the *National Development Plan (NDP)*.

The RSES provides a strategic vision, a settlement strategy, an economic plan, an environmental strategy, a transport plan, a vision for quality of life, a utilities plan, and a strategy for the implementation, monitoring and evaluation of the above. It notes that the Region is experiencing rapid population decline in certain areas, including parts of Cork City and county.

Changing age structures are forecast, with a significant (56%) increase in those aged over 65 expected by 2031. There will also be a significant increase in the 15-24 years age cohort (26%).

The overall strategy for the region comprises of 11 *Strategy Statements*. These include 'harnessing the combined strength of [the Southern Region's] 3 cities as a counterbalance to the Greater Dublin Area, through quality development, regeneration and compact growth', 'strengthening and protection the region's [...] built heritage', and 'safeguarding and enhancing our environment through sustainable development'.



Delivering ambitious and sustainable growth targets for the cities of the region, creating green and highly liveable metropolitan areas, and revitalising urban areas and spaces through creative and regenerative placemaking in order to deliver on compact growth and housing need are all central to achieving the goals of the Region's Strategy.

Regional Policy Objective (RPO) 10 highlights the region's commitment to compact growth. The Land Development Agency is noted as a key agent in the progression of compact and strategic housing delivery in cities.

In particular, initiatives that facilitate the regeneration of derelict buildings and vacant sites for the provision of high-quality environmentally friendly NZEB housing are promoted. Greater density schemes encompassing sustainable design and an element of green infrastructure on key strategic sites are appropriate.

The purpose of the Strategy is to support the implementation of *Project Ireland 2040* through providing a long-term strategic planning and economic framework for the development of the Regions. The RSES includes a *Metropolitan Area Strategic Plan (MASP)* to ensure a steady supply of serviced development lands throughout the City's Metropolitan area to support Cork's sustainable growth and continued competitiveness.

The subject site is located in the area identified as the 'City Suburban Area' within the Cork Metropolitan Area. Within the Cork City and Suburbs area, the RSES supports the redevelopment of infill, brownfield and underutilised lands for higher density living, with a minimum of 50% of all new homes to be provided within the existing built up area of Cork City. 'Inherent climate resilience', such as strategic locations on higher ground, is cited as an important factor in assessing development viability. The integration of transport and land use, as well as the accelerated provision of housing are considered integral to the future strategic development of Cork City. Effective land management is crucial in this regard.

Placemaking initiatives, which incorporate green infrastructure and natural assets, are actively promoted in Cork's MASP *Policy Objective 17*. Integration between green spaces throughout the city, to create an enhanced regional network of scaled park areas is important for the liveability of the metropolitan area. The provision of such amenities is integral to the creation of high-quality, sustainable urban settlements, and should be ensured through cooperation between stakeholders.

Comment: The subject proposal contributes to the sustainable development of Cork City and suburbs in line with the objectives of the RSES and the Cork MASP. The subject site, which is well situated in close proximity to Cork City Centre, will be well-connected to the City via potential pedestrian links and public transport. In addition, there are a number of key employment centres in close proximity.

The proposed residential scheme incorporates an important element of Cork's architectural heritage, and while safeguarding cherished elements of the extant landscape quality, provides high-quality, sustainable city-living options for Cork's growing population.



3.2 Cork Metropolitan Area Draft Transport Strategy 2040

The *Cork Metropolitan Area Draft Transport Strategy 2040* (hereinafter Transport Strategy) has been prepared by the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), and both Cork City and County Councils, with regard to the Cork Metropolitan Area (CMA) which includes a substantial section of Cork County.

The purpose of the Strategy is to:

“Provide a coherent transport planning policy framework and implementation plan around which other agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing and water can align their investment priorities.”

Current challenges facing the Metropolitan area – particularly with regard to the projected growth of Cork City and its environs – includes, *inter alia*, a legacy of dispersed patterns of residential development outside of the central city area and a resultant over-reliance on the private car for relatively short trips. The Transport Strategy’s vision for 2040 is to ‘*deliver an integrated transport network that addresses the needs of all modes of transport, offering better transport choices, resulting in better overall network performance and providing capacity to meet travel demand and support economic growth*’.

To achieve this vision, the Transport Strategy identifies a number of guiding principles. Principle 02 is:

‘To prioritise sustainable transport and reduce car dependency within the CMA.’

A number of land-use interventions which can assist the realisation of this modal shift are highlighted throughout the Transport Strategy. These include the necessary increase in future residential densities throughout centrally located and accessible settlements within Cork City, the delivery of consolidated development within serviced areas in the short-term in order to support the sequencing of future investments, and the promotion of policies which support the provision of development layouts which prioritise walking and cycling.

Comment: The proposed residential development in the application, which provides for a density of c. 63 units per hectare, adjacent to existing good quality public transport, and within walking and cycling distance of major employment centres and educational facilities, is considered to be wholly compliant with the above detailed *Cork Metropolitan Area Draft Transport Strategy*. The design of the internal roads and paths encourages walking and cycling as an alternative to the private car. In addition, the enclosed Mobility Management Plan outlines sustainable commuting targets for both residents and visitors to the proposed development.

3.3 Cork Area Strategic Plan 2001-2020

The *Cork Area Strategic Plan (CASP)* sets out ‘*a broad-brush strategy which aims to provide guidance as to the general direction and scale of growth so that the Cork City-Region can provide a high quality of life and opportunity for all of its citizens over the next 20 years*’. The aspirations of the plan are to, *inter alia*, attain critical mass, make efficient use of investment in infrastructure, provide a high-quality environment, and to improve the attractiveness of the region.



Regeneration of under-utilised and derelict sites is considered integral to the survival of Cork City as the economic driver of the region. The dominant pattern of residential development at the time, including large numbers of one-off 'commuter' housing in the countryside, was deemed unsustainable and unbalanced.

Specific policies to address the prevailing development pattern include the promotion of more efficient urban areas through the development of vacant sites, and the rehabilitation and more intensive reuse of under-utilised older buildings.

Comment: The subject proposal is fully compliant with the CASP. The proposal advances plans for an infill residential development on a currently vacant site, which incorporates the renovation of a derelict protected structure.

The proposed development, in close proximity to the City Centre and other employment, education and retail centres, seeks to counter the historical development pattern of the City, which saw a marked decrease in Cork City's population, contributing to improved sustainability in land-use, transportation provision and infrastructure investment.

4.0 Local Policy

4.1 Cork City Development Plan 2015-2021

The *Cork City Development Plan 2015-2021*, which was compiled and adopted by the Local Authority, is the statutory plan for the area and will guide all future development relating to the subject lands.

4.1.1 Core Strategy

Section 2 of the *Development Plan* sets out its Core Strategy. The vision for Cork City will be achieved through a series of seven interconnected strategic goals. These are:

- Goal 1 – Increase Population and Households to Create a Compact Sustainable City;
- Goal 2 – Achieve a Higher Quality of Life, Promote Social Inclusion and Make the City an Attractive and Healthy Place to Live, Work, Visit and Invest In;
- Goal 3 – Support the Revitalisation of the Economy;
- Goal 4 – Promote Sustainable Modes of Transport and Integration of Land Use and Transportation;
- Goal 5 – Maintain and Capitalise on Cork's Unique Form and Character;
- Goal 6 – Tackle Climate Change Through Reducing Energy Usage, Reducing Emissions, Adapt to Climate Change and Mitigate Against Flood Risk;
- Goal 7 – Protect and Expand the Green Infrastructure of the City.

Comment: The subject proposal encompasses many of the above goals. The City's resident population will grow as housing supply in the City increases. The density achieved on this site, its current brownfield characteristics, and the location close to the city centre and other important population nodes, contributes positively to the compaction and densification of Cork. This development pattern in general, combined with the well-considered design aspects of the scheme, creates a higher quality of life for residents.

The promotion of sustainable transport modes is achieved by, *inter alia*, the co-location of the proposed development with public transport options, as well as being close enough to various nodes to consider walking or cycling.

The renovation of a Protected Structure as part of this development scheme conserves an important piece of the City's built heritage, and adds positively to the unique form and character of the extended city. The application of new energy efficiency standards for housing across the scheme, as well as the cumulative impact of the central city location, addresses issues of environmental sustainability and climate change.

Finally, the careful consideration of the surrounding historical landscape, and the integration of a high degree of quality green spaces throughout the development, aims to protect and expand the green infrastructure of the City.

4.1.2 Residential Strategy

Section 6 of the *Development Plan* comprises the Council's *Residential Strategy*. *Residential Strategic Objectives* (Objective 6.1) include the encouragement of sustainable residential development, including the use of derelict or underused land and buildings. Such development will necessarily integrate high standards of design, energy efficiency, estate layout and landscaping. Objective 6.7 states Cork City Council's commitment to the further expansion of the private owner occupier and private rented sectors to ensure the continuation of a range of housing choices in the city. Objective 6.8 promotes a mix of housing and apartment types, sizes and tenures. Objective 6.9 aims to ensure suitable housing densities.

Comment: The subject proposal represents a high-quality, sustainable neighbourhood which includes the renovation of a derelict, endangered Protected Structure. The range of housing typologies presented throughout the scheme contributes significantly to the housing choice faced by Cork residents, providing apartments, townhouses and duplexes where there is a marked undersupply of such house typologies available. The density achieved on site, c. 63 units per hectare is considered suitable.

4.1.3 Built Heritage and Archaeology Strategy

Section 9 of the *Development Plan* outlines the Council's *Built Heritage and Archaeology Strategy*. Objective 9.1 states the Council's intention to, *inter alia*, promote the retention, reuse and enhancement of buildings of architectural significance. The subject proposal seeks permission for the redevelopment of a Protected Structure. The structural stability of this historic building has been substantially impaired due to a fire. Objective 9.27 allows for '*enabling development*', which includes the restoration of a Protected Structure which is currently in poor condition, to conservation best practice standard for any purpose compatible with the character of the building.



Comment: The sensitive renovation of the former St. Kevin’s Hospital and certain other built elements of the historical institutional complex is fully consistent with the Council’s heritage policy.

The building was badly damaged in a 2017 fire, with just the external walls surviving. As such, an opportunity to re-imagine this infamous piece of Cork’s Victorian architectural heritage was presented. It’s development into apartments is the logical progression from its historic use as a hospital and asylum. In addition, the enclosed *Archaeological Assessment* has been prepared by Irish Archaeological Consultancy Ltd., as noted above.

4.1.4 *Landscape and Natural Heritage Strategy*

Section 10 of the *Development Plan* addresses the City’s landscape and natural heritage. Objective 10.5 details the functions of *Landscape Preservation Zones*. These delineations exist to preserve and enhance the character and visual amenity of *Landscape Preservation Zones* through the control of development, which will only be considered where it safeguards the value of the particular landscape. Site specific objectives and a description of the landscape asset to be protected are provided for each Landscape Preservation Zone in Table 10.2.

The subject site comprises part of Landscape Preservation Zone NW2 (see Figure 4.1, Zoning Map, below). This zone includes four elements which require protection:

- G (Landmarks);
- A (Topography);
- C (Canopy) and
- E (Visually Important Land).

Comment: The inherent sensitivity of the existing landscape and topography of the subject site has been a crucial design parameter during the iterative design process. Maintaining a significant quantum of green space, retaining existing trees where possible and incorporating the distinctive topographical characteristics of the environment into the layout and design of the proposed development, while respecting the unparalleled prospects across the City from the site, have been paramount considerations to the Design Team.

We believe this has been successfully incorporated into the design, to facilitate of a high standard of residential amenity for future residents of the scheme. The current scheme reflects the perceived optimal which emerged from subsequent design iterations.

In addition, A *Landscape and Visual Impact Assessment Report* (LVIA) has been prepared by Macroworks and has been included with the application. This Report concludes;

“The impact of the proposed development on Landscape / Townscape has been considered at both construction stage and operational stage (post-completion). It has also been considered in respect of physical effects on the landform and land cover of the site as well the contribution of the proposed development to wider townscape fabric and character.



Due to the typical clutter and activity associated with major refurbishment and construction projects of this scale and in this prominent location, which is deemed to be of 'High-medium' sensitivity, construction stage townscape impacts are deemed to be 'Moderate' negative. However, such effects are inevitable and, most importantly, are temporary / short term in duration.

Once completed (operational), it is considered that the proposed development will have either an Imperceptible or Enhancing effect on the prevailing landscape / townscape of the site and its surrounds. This is on the basis that there will be an increased intensity of built development within the site, but this is not deemed inappropriate in terms of scale, form and function and has been thoughtfully designed to complement and reinforce the key heritage and landscape assets. Any minor dilution of the relatively open/discrete setting of St Kevin's Hospital is balanced by the refurbishment that will take place to this derelict building and its neglected site.

The visual impact of the proposed development was assessed from 13 viewpoints representing a range of receptors, viewing distances and directions including relevant designated viewpoints from the Cork City Development Plan.

The range of receptor sensitivity at viewpoints range widely between High and Medium-low depending on whether they represented iconic and designated views towards the site, or more typical or partial obscured views from residential housing estates where the St Kevin's Hospital site does not materially contribute to visual amenity. Those viewpoints at the higher end of the sensitivity spectrum are typically designated views from south of the River Lee looking northwards across the river corridor to where St Kevin's Hospital and the neighbouring Atkin's Hall (Our Lady's Hospital) present a commanding duo of heritage facilities standing sentry over the western sector of the city. Those at the mid to lower end of the sensitivity spectrum are typically downslope or cross-slope and partially obscured views towards the site from residential housing estates on the northern side of the River Lee.

The magnitude of visual impact is not considered to range as widely as receptor and is deemed to be 'Negligible' or 'Positive' in all but one instance. This is either due to the proposed development being barely discernible and/or having no material effect on existing visual amenity as is typically the case from the residential receptors on the northern side of the River Lee. Alternatively, the positive visual effects will be experienced where the St Kevin's Hospital building remains the most prominent feature of the site and its burnt-out roof sections are seen to be restored.

The only negative impact - a very minor one - occurs in respect of VP12, where the rooflines of new residential terraces stack up beyond St Kevin's Hospital. These slightly blur the distinction of the roofline of the heritage building, albeit without obscuring any aspect of the heritage structure or diminishing its dominant status within the site. The result is deemed to be a Slight-imperceptible visual impact."

It is considered that the proposed development will not give rise to any significant residual townscape or visual impacts. Instead, such impacts will generally be imperceptible or result in minor enhancement of the townscape and visual setting through refurbishment and consolidation of the site and its key structures.

The most important townscape and visual consideration in this instance is whether the commanding stature of St Kevin’s Hospital in conjunction with Atkin’s Hall (Our Lady’s Hospital) rising above the River lee and Cork City’s western suburbs, is diminished in any material way. Based on the enclosed assessment, on the whole it is not considered that this commanding presence is diminished by the proposed development and instead, it will be restored and consolidated for future generations.

4.1.5 Subject Lands Zoned for Residential Development

The subject lands are partly zoned ‘4 – Residential, Local Services and Institutional’, the objective of which is *“to protect and provide for residential uses, local services, institutional uses, and civic uses, having regard to the employment policies outlined in Chapter 3.”* Section 15.10 states that *‘the provision and protection of residential uses and residential amenity is a central objective of this zoning’*.

The site also comprises a section of zoning ‘12 – Landscape Preservation Zones’. The objective of this zoning, which is contained to the southern extremes of the site, is to *“preserve and enhance the special landscape and visual character of landscape preservation zones”*. The entire site is considered to be an area of high landscape value.

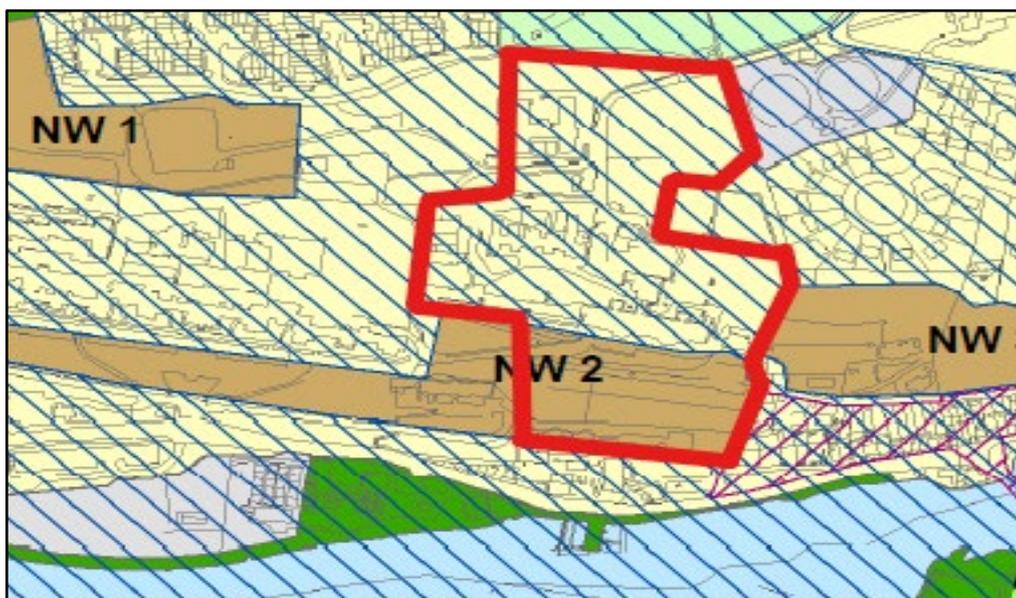


Figure 4.1: Extract of Zoning Map No. 9, North Western Suburbs Objectives, with subject site indicatively outlined in red (Source: Cork City Development Plan, 2015-2021, annotated by Tom Phillips + Associates 2020).

Proposed Development will Protect and Improve Residential Amenity in the Area

The Applicant has retained a multi-disciplinary Design Team, which have designed the development to protect and improve the residential amenities of the area as well as those of the proposed development.

The various assessments enclosed with this planning application demonstrate that the proposal will complement the surrounding land uses and contribute to the development of the established residential community, in addition to consolidating the wider north western suburban area.



At present, the lands are partially brownfield-institutional, underutilised and not accessible to the public. This is not a sustainable use for the lands acknowledging the current housing crisis, and contravenes the land's zoning objective and National policy to provide additional housing in appropriately zoned locations. The proposed development also incorporates a large area of public open space, including children's play area, further enhancing local amenity provision. The proposed development provides adequate separation distances to the boundaries and will not result in overlooking or overbearing impacts on the adjoining residential properties or within the development.

Comment: To note, the site's zoning under the *Development Plan* states;

*"The provision and protection of residential uses and residential amenity is a central objective of this zoning, which covers much of the land in the suburban area. However other uses, including small scale local services, institutional uses and civic uses and provision of public infrastructure and utilities are permitted, provided they do not detract from residential amenity and **do not conflict with the employment use policies in Chapter 3 and related zoning objectives**. Small scale 'corner shops' and other local services such as local medical services, will be open for consideration. Schools, third level education institutes, and major established health facilities are located within this zone and appropriate expansion of these facilities will be acceptable in principle. **The employment policies in Chapter 3 designate particular locations for offices, office-based industry, major retailing development and these uses are not generally permitted in this zone** (Chapter 3: Enterprise and Employment). New local and neighbourhood centres or expansion of same are open for consideration in this zone provided they meet the criteria for such centres set out in Chapter 4." (CCDP 2015-2022, pg. 227.) [Our emphasis.]*

While the compliance of the residential and local crèche elements of the scheme with the zoning designation is inherent, the provision of an enterprise office space in the former Chapel is not as clear. The above wording would suggest that office use is not usually permitted, however the word '*generally*' might suggest some flexibility, while not wholly permissible.

Following discussions with Cork City Council, the Local Authority confirmed that flexibility would be given in this instance, due to the scale of the proposal in the context of a wider SHD regeneration scheme.

In particular, this was deemed to be acceptable under *Policy Objective 9.27 of the Development Plan - Enabling Development*, where it states;

"Cork City Council will consider permitting the following, notwithstanding the zoning objectives of the area:

*- The restoration of a Protected Structure, or other buildings of architectural or other merit, currently in poor condition, to conservation best practice standard **for any purpose compatible with the character of the building.**" [Our Emphasis]*

It is submitted that the proposed conversion of the derelict Chapel building to a 630 sq m enterprise office would ensure the restoration and occupation of a currently vacant, derelict heritage structure for the foreseeable future and that the proposed development would be in accordance with the proper planning and sustainable development of this area.



Further information as to how this enterprise office space is to be utilised is provided for in the accompanying *Design Statement*, prepared by Reddy Architecture + Urbanism.

4.1.6 *Housing Development Policy*

We outline below a number of key *Development Plan* development management policies, including:

- Residential density;
- Overall housing mix;
- Social housing (Part V);
- Dual aspect;
- Apartment size standards;
- Floor-to-ceiling height;
- Stair and lift cores;
- Public open space provision;
- Private open space provision;
- Car parking;
- Cycle parking; and
- Waste Storage / Recycling.

The details of these parameters as they relate to the proposed development are discussed.

Residential Density

In terms of the density provisions within the *Cork City Development Plan 2015-2021* in relation to Residential Density. Section 16.41 states:

“Minimum residential density in Suburban areas should be 35-50 dwellings.”

[Our Emphasis]

Regarding density, the Plan then states:

“Densities of greater than 50 dwellings per hectare will normally require a mix of houses and apartments. Densities higher than this baseline level will also be appropriate in other types of location:



- ***Along bus routes*** densities should be to a minimum density of 50 dwellings per hectare (subject to constraints imposed by the character of the surrounding area);
- At ***larger development sites***, (>0.5 hectares in size, the size of a residential block), ***capable of generating and accommodating their own character.***”

[Our Emphasis]

Comment: This application comprises 266 no. units, resulting in c. 63 dwellings per hectare, in accordance with the above requirements. The proposed development aligns with the required criteria in relation to higher densities on sites in close proximity to bus routes, and at larger development sites capable of generating and accommodating their own character.

The scheme has been designed sympathetically to respond to the receiving environment, minimisation of any overbearing or perceived overlooking on adjoining residential properties, as well as integration into existing topography patterns of the site.

Overall Housing Mix

Section 6.20 of the *Development Plan* relates to housing mix:

“Objective 6.8: Housing Mix

To encourage the establishment of sustainable residential communities by ensuring a mix of housing and apartment types, sizes and tenures is provided. Planning applications for multiple housing units shall submit a Statement of Housing Mix detailing the proposed mix and why it is considered appropriate. The needs of special groups such as the elderly and disabled shall also be considered as part of this process.”

Policy relating to dwelling size mix is detailed in Section 16.43 of the *Development Plan*. Here, the need for a range of housing types and sizes is highlighted, as recent trends show a changing local demographic relating to household sizes. While certain households are getting smaller, and need to be catered for in relation to housing provision, there still exists a pertinent need for family homes.

General city zones are delineated in ‘*Map 11 – Car Parking Zones*’, Volume 2 of the *Development Plan*. The subject site is located in Zone 3. Figure 4.2, below, illustrates the relevant aspects of ‘*Table 16.4 – Indicative Targets for Dwelling Size and Distribution*’, from the *Development Plan*.

Figure 4.2: Indicative Targets for Dwelling Size and Distribution – Zone 3.		
<i>Household Size</i>	<i>House Size</i>	<i>Zone 3 (Suburbs)</i>
<i>1 Person</i>	1 Bed	Max 20%
<i>2 Persons</i>	2 Bed	Min 30%
<i>3 Persons</i>	3 Bed/3+ Bed	Min 50%
<i>4 Persons</i>		
<i>5 Persons</i>		
<i>Total</i>		100%

Source: Table 16.4, Cork City Development Plan 2015-2021, Volume 1. Extracted by TPA, 2020.

Comment: The proposed development provides a mix of dwelling types and sizes that will accommodate a variety of tenures and households and is, therefore, compliant with *Objective 6.8*. Details of this are provided in the duly provided *Housing Quality Assessment*, prepared by Reddy Architecture + Urbanism. There is a range of communal and private amenity spaces and facilities for children of different ages and the elderly. Disabled car parking provision is also provided in the development.

Social Housing (Part V)

The *Development Plan* notes the following respect of Social Housing (Part V):

“Objective 6.3: Social Housing under Part V

To require that 14% of units on all land zoned for residential uses [...] to be reserved for the purpose of social housing and specialised housing needs.”

Comment: The proposed development is subject to the requirements of the *Part V of the Planning and Development Act 2000 (as amended)*. Social housing provision requirements have been discussed with the Housing Department in Cork City Council. Part V requirement details are enclosed with the SHD Application Form, as outlined in Section 2.8 of this *Report*.

Dual Aspect

Section 8.2.2 of the *Development Plan* relates to *Dual Aspect*. This section states, *inter alia*:

“The target is for 90% of apartments to be dual aspect. No single aspect apartments should be north facing. Applications will need to demonstrate daylight/sunlight quality in these apartments.”

Comment: Reddy Architecture + Urbanism have prepared the enclosed *Housing Quality Assessment*, which includes a breakdown of dual aspect statistics across the scheme. 75% of the apartments to be provided in the scheme achieve the desired dual aspect target.



While we note Cork City Council's requirement above, we also note that the scheme achieves well in excess of what is required under national standards, as outlined in *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018) Specific Planning Policy Requirement 4*, which states;

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

The quantum of dual aspect ratio achieved is due to the sensitive approach taken to the restoration of the former St. Kevin's Hospital to provide 60 no. apartments. In addition, we note the following in the enclosed *Sunlight and Daylight Access Analysis*, prepared by ARC confirms;

"Having regard to the shape, layout and orientation of the application site; to the retention of St. Kevin's Hospital Building and existing Chapel; and to the topography of the lands surrounding the site, the potential of the proposed development to result in material overshadowing of lands outside the application site is very limited.

Specifically, there is limited potential for the proposed development to result in a material change in the shadow environment on lands to the east of the site due, in part, to the proposed configuration of development on the site, and, in part, to the sloping southern facing nature of the site... The impact of the proposed development on lands to the east is, therefore, assessed as none to "imperceptible" to "slight"... As such, the impact of the proposed development on lands to the north, south and west is likely to range from none to "imperceptible" ...

ARC's analysis indicates that the construction of the proposed development has the potential to result in little or no change in daylight access to most neighbouring existing buildings. The impact of the proposed development on most existing buildings surrounding the application site is likely to range from none to "imperceptible". Given that the potential for development to result in impacts on daylight access diminishes with distance, it is the finding of ARC's analysis the proposed development will have no undue adverse impact on daylight access within buildings in the wider area surrounding the application site." [Cropped by TPA, 2020]

In addition, ARC undertook an assessment of the likely daylight access within the proposed residential units. The *Report* concludes;

"A representative sample of rooms within the proposed development was studied at the lowest levels of accommodation given that daylight access to lower levels will be the most obstructed in terms of daylight access so issues in respect of daylight access are most likely to occur at the lowest levels of accommodation.

An emphasis was placed on analysis of rooms likely to receive lower levels of daylight (e.g. rooms with the potential to receive lower levels of daylight access due to their location within the proposed development and/or due to their layout and fenestration)...

ARC’s analysis indicates that all sample study rooms within the proposed development will achieve levels of daylight access at or above the minimum Average Daylight Factor recommended by the British Standard for living rooms (i.e. 1.5% Average Daylight Factor) and for kitchens (i.e. 2% Average Daylight Factor). All sample study rooms within the proposed development are predicted to achieve a level of daylight in excess of that recommended by the British Standard for a predominantly daylight appearance (i.e. 2% Average Daylight Factor).” [Cropped by TPA, 2020]

A sensitive restoration of the former St. Kevin’s Hospital building, to provide 60 no. apartments is achieved, combined with positive daylight and sunlight results.

It is submitted that the proposed conversion of the former St. Kevin’s Hospital building would ensure the restoration and occupation of a currently vacant, derelict Protected Structure for the foreseeable future and that the proposed development would be in accordance with the proper planning and sustainable development of this area.

Apartment Size and Key Floor Dimensions

The *Development Plan* provides the following Table (Table 16.5) in respect of minimum overall apartment size standards. These figures are to be supplemented by minimum standards for private open space.

Figure 4.3: Minimum Overall Apartment Gross Floor Areas	
Dwelling Type	Size
One-bedroom	55 sqm
Two bedroom / 3 persons	80 sqm
Two bedroom / 4 persons	90 sqm
Three bedroom	100 sqm
Four bedroom	115 sqm

Source: Table 16.5, Cork City Development Plan 2015-2021, Volume 1. Extracted by TPA, March 2020.

Further, the minimum internal room dimensions outlined in *Quality Housing for Sustainable Communities – Guidelines for Planning Authorities*, prepared by the Department of Environment, Heritage and Local Government in 2007, will be applied to new dwellings. These guidelines have since been superseded by the 2018 *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities*.

Comment: The 2018 *Apartment Guidelines* provide a number of *Specific Planning Policy Requirements (SPPRs)*, including certain minimum and maximum standards the minimum standards for apartment units. Where any conflict arises between an SPPR and the *Development Plan*, the *Guidelines* supersede the *Development Plan*. The enclosed *Housing Quality Assessment* and related drawings prepared by Reddy Architecture + Urbanism demonstrate compliance with the relevant standards both for apartments.



Floor-to-Ceiling Heights

The *Development Plan* prescribes certain standards relating to floor-to-ceiling heights.

“Apartments will have a minimum floor-to-ceiling height of 2.7 m (3 m floor to floor) apart from in exceptional circumstances relating to architectural conservation.”

Comment: Floor-to-ceiling heights across all units within the proposed scheme comply with this minimum standard of 2.7 m.

Stair and Lift Cores

It is recommended in the *Development Plan* that a maximum of 4 apartments per floor should be accessed from a lift/stair corridor. Such measures ensure a high quality of internal circulation space.

Comment: Each stair and lift core serves no more than 4 apartment units per floor.

Public Open Space for Residential Developments

Section 16.61 states that public open space in all types of residential development should:

- *Be visually and functionally accessible;*
- *Be adequately overlooked by residential units;*
- *Integrate natural features, where appropriate;*
- *Be viable spaces, linked together where possible, designed as an integral part of the overall layout and adjoining neighbouring communal open spaces;*
- *Create safe, convenient and accessible amenity areas.*

Public open space is required to be provided at a general rate of 10% of the total site area. In exceptional circumstances, such as where developments are close to existing public parks and other amenity facilities, can result in a reduction in the quantum of public open space required. For certain institutional sites, whereby the site forms the setting to a building of significance, the proportion of public open space to be provided can rise to a minimum of 20%, subject to site specific analysis.

Comment: Table 16.2 of the *Cork City Development Plan 2015-2021* identifies a minimum 20% requirement for the provision of Public Open Space for ‘*Institutional Sites/Sites forming the setting to a Building of Significance*’. In our opinion, having regard to the former Institutional nature of the subject site and the Protected Structure status of the significant St. Kevin’s building, it is considered that this open space requirement applies to the subject development.



The calculation of Public Open Space for the St. Kevin's development is complex, given the steep topography of the site and the presence of sensitive existing structures on the site. In this regard, whilst the red line application boundary relates to an overall site area of 5.7 ha approximately, this includes the area zoned as Landscape Preservation Zone (LPZ), which is being kept free from development in line with Development Plan policy, together with areas where the site topography simply precludes new development.

As such, the 'developable' area of site that remains available comprises 4.2 ha. By our calculations, therefore, the subject development provides a total of 7,200 sq m (0.72 ha) of useable passive and active Public Open Space within the development. This equates to c. 17% of the developable site area.

This is below the minimum Public Open Space *Development Plan* requirement for development on '*Institutional Sites/Sites forming the setting to a Building of Significance*' of 20%, which would result in the required provision of c. 8,400 sq m (0.84 ha). On that basis, it is considered that this shortfall in open space provision comprises a Material Contravention of the *Development Plan*.

Please refer to the drawing enclosed with the Material Contravention Statement, prepared by Aecom titled '*Open Space Calculation*', which illustrates the overall site area and the above referenced 'developable area' and the relevant areas of proposed Public Open Space.

As required in legislation, it is submitted that the above contraventions can be justified under Section 37(2)(ii) of the *Planning and Development Act 2000* (as amended) where the Board may determine under this section, to grant a permission even if the proposed development contravenes materially the Development Plan relating to the area of the planning authority to whose decision the appeal relates.

This section states that the Board may only grant permission in accordance with paragraph (a) where it considers that:

- (ii) *There are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or...*

It is considered that the proposed development will inherently accord with National and Regional sustainable planning principles particularly in relation to the promotion of more compact and efficient forms of urban development on brownfield sites and increased residential densities in appropriate locations. This is in line with the National Planning Framework and the above referenced apartment design guidelines.

Regarding the provision of Public Open Space on the site, it is noted that Table 16.6 of the *Development Plan* re-states the relevant open space requirement as 10-15% of the relevant site area. There is no further mention of the minimum 20% requirement as described above. The proposed Public Open Space provision in this development would comfortably exceed the 15% provision as required in Table 16.6. Accordingly, it is submitted that there are unclear or conflicting objectives in the *Development Plan* in respect of Public Open Space provision as per Section 37(2)(ii) of the Act as described above. In addition, it is noted that when the LPZ is taken into consideration (1.27 ha), which will be available for use as Public Open Space, the overall provision increases to 2.59 ha, or some c. 45% of the overall landholding.

On that basis, it is submitted that the Board can grant permission for the proposed development, having regard to the above provision.

Private Open Space for Residential Developments

Table 16.7 of the *Development Plan* (reproduced in this document as Figure 4.4, below) shows the minimum requirements for private open spaces within suburban areas in Cork City.

Figure 4.4: Private Amenity Space Guidelines	
Unit Type	Area (sqm) per Unit
Townhouses / Terraced Houses	48-60
Detached / Semi-Detached Houses (1 – 2 beds)	48-60
Detached / Semi-Detached Houses (3 – 5 beds)	60-75
Duplexes	12-15
Apartments – 1 bed	6
Apartments – 2 bed	8
Apartments – 3 bed	12

Source: Table 16.7, 'Private Open Space Standards (Min. Requirements)'. Volume 1, Cork City Development Plan 2015-2021.

Section 16.64 states that in townhouse and mews development, private open space should be provided in small rear yards and balconies. Front garden space will not be considered as private open space for calculation purposes.

Section 16.66 details Cork City Council's balcony standards. Balconies should provide a continuation of the principle living space, feature a minimum depth of 1.5 m, include a well-designed screen area for the outdoor drying of clothes, be safe for children to play on, and provide an appropriate level of intervisibility.

Comment: The apartment balconies meet the above stated the minimum standards, as per the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018)*, which supersede the above standards, as outlined in the enclosed *Housing Quality Assessment*.

The *2018 Apartment Guidelines* on private amenity space are as follows;

Figure 4.5 Private Amenity Space Guidelines	
No. Of Bedrooms	Min. Floor Areas For Private Amenity Space
1	5 sq m
2 (3 persons)	6 sq m
2 (4 persons)	7 sq m
3	9 sq m

Source: Appendix 1, "Required Minimum Floor Areas and Standards" of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2018).

The enclosed *Housing Quality Assessment* and related drawings, as prepared by Reddy Architecture + Urbanism, provides details of the private open space provision for each of the apartment types and dwelling units.

Car Parking

Table 16.8 of the *Development Plan* indicates general car parking standards for Cork City. Figure 4.6, below, reproduces the relevant aspects of this table.

Figure 4.6: Car Parking Standards – Zone 3	
No. of Bedrooms	No. of Car Parking Spaces Required
1 – 2 Bedroom	1 plus 0.25 spaces for visitor parking
3 – 3+ Bedroom	2 plus 0.25 spaces for visitor parking
Creches	1 per 6 students
Office / Enterprise and Employment	50
<i>Source: Table 16.8 'Car Parking Standards', Volume 1, Cork City Development Plan 2015-2021.</i>	

Section 16.113 states that 5% of car parking spaces provided should be set aside for disabled car parking. Parking bay widths for disabled persons should be a minimum of 3 meters wide by 4.75 meters long.

Section 16.117 of the *Development Plan* states that developments providing 10 or more parking spaces shall provide at least one parking space equipped with a functioning EV charging point and at least 10% of spaces shall incorporate ducting to allow the future fit out of a charging point.

Comment: Car parking to be provided is discussed in the report above, but also in the enclosed documentation prepared by ILTP Consulting.

Cycle Parking

Table 16.9 of the *Development Plan* indicates general car parking standards for Cork City. Figure 4.7, below, reproduces the relevant aspects of this table.

Figure 4.7: Cycle Parking Requirements	
No. of Bedrooms	No. of Car Parking Spaces Required
Standard Apartments	0.5 per unit in Suburbs
General Offices	1 per 150 sqm
Creches	1 per 25 children
<i>Source: Table 16.9 'Cycle Parking Requirements', Volume 1, Cork City Development Plan 2015-2021.</i>	

Comment: The Cork City Development Plan requires 1 no. bicycle parking space per apartment unit. In addition, it is proposed that additional visitor cycle parking will also be provided on surface. The proposed development will deliver in excess of this provision, as outlined in the enclosed documentation, prepared by ILTP Consulting, with 495 no. cycle parking spaces to be provided. This includes the provision of cycle parking for crèche and enterprise office centre staff and visitors. The assessment confirmed that the cycle parking provision will be well in excess of the *Development Plan* requirements and consistent with the *Apartment Guidelines*.



Waste Facilities / Recycling

Section 12.22 of the *Development Plan* requires that adequate waste storage facilities and management procedures in private developments is critical to maintain high levels of residential amenity and reduced pollution.

Comment: The scheme design has incorporated the rational storage and collection of waste/refuse both in respect of apartments, houses and commercial units.

14.1.7 Traffic Impact Assessment

In order to assess the traffic impact of the proposed development it was first necessary to assess the current traffic situation in the area. Site appraisals and fully classified traffic counts in the environs of the proposed development were undertaken in February 2020.

The scope and extent of the traffic count surveys was agreed with Cork City Council at pre-planning stage. ILTP carried out traffic model analyses of the junctions adjoining the proposed development to project the impact of additional traffic flows from the proposed development on the capacity of the junctions. From these results a conclusion could be drawn as to the impact that the development will have on the adjoining road network.

Comment: Detailed results of this assessment are provided in the enclosed documentation prepared by ILTP Consulting;

“The revised development reduces very slightly the trip rates to that assumed in the original TTA. While these changes would not materially alter the results or finding of the previous analysis, ILTP for completeness have undertaken a full update of all the traffic assessments and modelling undertaken.”

Subject to planning, the Opening Year of the first phase of the proposed development is projected to be 2022, and the corresponding Design Year is taken to be 2037, which is 15 years after the Opening Year. Following pre-planning discussions with CCC on trip rates, ILTP also made a number of robust assumptions in respect to traffic increases that might result from the proposed development as previously set out in this report. In addition, no downward adjustment was made as a result of the reduce car parking provision for the development. The analysis therefore represents a very robust assessment of the likely traffic impact of the proposed development.”

Further information in relation to this is provided in the enclosed *Traffic and Transport Assessment and Mobility Management Plan Report*.

14.1.8 Social Infrastructure / Amenity Audit

A *Social Infrastructure and Amenity Audit* has been prepared by Tom Phillips + Associates and is included with this Application.

The demographic assessment of Shanakiel (to which the proposed development site belongs) indicates that this area appears to have grown at a much higher pace (c. 20% increase from 2006-2026) than the rest of Cork City for the same period.



The socio-economic profile of the area is comprised predominately of 'Adults aged 24-64' (57%) and 'Families with children' including single and dual parent households (45%), which were primarily living in 'Houses/Bungalows' (81%) at the time of the 2016 Census.

However, a much lower percentage of 'Older Adults' were identified within Shanakiel (7%) than the rest of the settlement (13%), and a lower proportion of the population (aged 15+) had completed 'Third Level' education courses in Shanakiel (33% compared to 38% in settlement) in 2016.

These statistics indicate that a higher proportion of community facilities may be required for working adults and families in the Shanakiel area than other demographic groups. In our opinion, there is sufficient existing provision of social infrastructure in the vicinity of the subject site (i.e. within c. 2km equivalent to c. 10-15 minutes' drive time) to support the proposed development, as summarised below:

- **Community, incl. Childcare:** The Shanakiel study area is home to a wide range of community and social services, including childcare, with more than 60 No. community centres and related resources identified within the study area including Holyhill & Knocknaheeny Family Centre and Linkpoint (Blarney Street Youth Project) as well as larger facilities such as Cork County Hall and the Cork City Partnership. We note that 9 No. existing childcare facilities were also identified which currently provide more than 500 No. childcare spaces to local residents. An additional crèche facility is to be provided with the proposed development.
- **Education and Training:** The study area is well served at all levels of education and training and has access to 14 No. primary schools, 6 No. secondary schools and a variety of third level institutions (incl. UCC and CIT) within c. 10-minutes' drive, including a small range of specialty education facilities.
- **Healthcare incl. Elderly Service:** With respect to healthcare services, the study area is located within c. 10minutes' drive of Mercy University Hospital and St. Mary's Primary Care Centre to the north and Bon Secours Hospital and Cork University Hospital to the south. Other related healthcare facilities in the area include the NICHE Community Health Project, Rehabcare and The Cork Clinic, as well as 7 No. dedicated nursing facilities and other support centres for the elderly.
- **Recreation and Amenity:** More than 50 No. sports clubs and facilities, fitness centres, parks and playgrounds were identified within a c. 10- minutes' driving time of the proposed development, including the significant recreation facilities associated with UCC Mardyke Arena & Sports Complex and Fitzgerald Park and Playground within walking distance of the site. We note that 3 No. Community gardens/allotments and 2 No. Men's Sheds were also identified which provide opportunities for food growing and social support within the area.
- **Cultural incl. Libraries:** The subject site is located within walking distance of the Old Cork Waterworks & Lifetime Lab, Cork City Gaol Museum and Cork Public Museum (within c. 15-minutes' walk), along with a number of other religious, arts and media facilities within the study area. Cork County Library & Arts Service and Holyhill Library are also accessible within c. 5-minutes' drive and provide significant programming for children and adults within the community.



- **Retail:** A broad range of retail centres and stand-alone supermarkets were identified within the study area to facilitate the proposed development within a reasonable distance (c. 5-10 minutes' drive), however, including Holyhill Shopping Centre (c. 5-min) and Wilton Shopping Centre (c. 10-min). We note that Cork City Centre (incl. The English Market) is also accessible from the site within c. 10-minutes' drive.

On the basis of this infrastructure audit, potential gaps in the existing service provision of the area are limited to higher order retail centres in the immediate vicinity of the subject site (i.e. larger supermarkets within walking distance), along with more dedicated public recreation space for families with young children, particularly primary school children (aged 5-12 years).

We note that the proposed scheme includes a range of residential support amenities such as the proposed crèche and outdoor play spaces, along with woodland walks, open meadowed spaces, landscaped pedestrian zones, terraces and vantage points which will positively contribute to the amenity of the area and support local residents once the development is fully occupied.

14.1.9 Public Realm Design

The *Development Plan* states the following in respect of Public Realm:

“Objective 16.3:

- *To deliver high quality built environments through good placemaking;*
- *To ensure that development is designed to high qualitative standard and is cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking and detailed design.”*

Comment: The proposed development will result new high-quality high-density residential scheme on an underutilised, brownfield, appropriately zoned site. It will provide, *inter alia*, an enhanced public realm, including a new accessible public open space in an area of high landscape value, together with several high-quality smaller amenity spaces and areas of public realm.

In accordance with this Policy, Aecom have prepared a *Landscape Design Report*, which described and illustrates the range of landscape design measures proposed to ensure that the development complements the surrounding area of the site.



14.1.10 Building Height Strategy

The *Development Plan* defines building height categories as follows:

- Low-rise buildings – 1-3 storeys;
- Medium-rise buildings – 4-9 storeys;
- Tall buildings – 10 storeys or higher.

Section 16.26 states that the building height should be in proportion to the space between buildings. Section 16.27 clarifies that taller buildings will be considered at larger development sites (>0.5 hectares), which are capable of accommodating their own intrinsic character without having an adverse impact on their neighbours.

Comment: The scheme proposes a mix of building heights ranging from 2 to 4 no. storeys with an existing 5 no. storey structure, the St Kevin's Hospital building, in height. This design is guided by the historic built environment of the site, which incorporates buildings of up to 5 no. storeys. In accordance with the *Development Plan*, the subsequent design and layout of the proposed scheme maximises residential amenity with regards to the prevailing building height on site. Further, views and prospects from the site are not compromised by the taller residential element of the scheme, as the building currently exists and is protected.

15.0 CONCLUSION

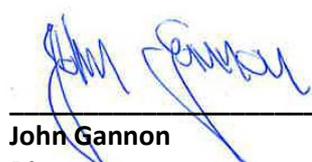
In summary, the proposed development will provide for 266 No. residential units on underutilised, serviced, brownfield, residentially zoned urban lands in the north-western suburbs of Cork in an area within close proximity to public transportation services, as well as significant regional employment nodes.

Having regard to the policies and standards prescribed at local level, and the rationale for the nature of the proposal as discussed above, it is submitted that there are a number of significant planning gains associated with this application which can be considered to represent the proper planning and sustainable development of the subject site. The proposed development will create a variety of housing types and sizes in a high-quality landscaped setting at a residential density that accords with National, Development Plan and LAP policy. Furthermore, the high-quality landscape strategy will ensure that the scheme integrates successfully into the existing area of high landscape value. We contend that the proposed development is fully in accordance with the following national and local policy documents:

1. *National Planning Framework (Ireland 2040 – Our Plan)*;
2. *Rebuilding Ireland: Action Plan for Housing and Homelessness (2016)*;
3. *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*;
4. *Urban Design Manual: A Best Practice Guide (2009)*;
5. *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018)*;
6. *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*;
7. *Childcare Facility Guidelines (2001)*;
8. *Part V of the Planning and Development Act 2000: Guidelines (2017)*;
9. *Design Manual for Urban Roads and Streets (DMURS) (2013)*;
10. *The Planning System and Flood Risk Management (2009)*;
11. *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*;
12. *Architectural Heritage Protection – Guidelines for Planning Authorities (2011)*;
13. *Climate Action Plan (2019)*;
14. *Southern Regional Assembly: Regional Spatial & Economic Strategy (January 2020)*;
15. *Cork Metropolitan Area Draft Transport Strategy 2040*;
16. *Cork Area Strategic Plan 2001-2020*; and
17. *Cork City Development Plan (2015-2021)*.

In conclusion, we submit that the development of this site, as per the enclosed plans and particulars, is fully in accordance with the proper planning and sustainable development of the area.

Yours sincerely



John Gannon
Director
Tom Phillips + Associates