



An
Bord
Pleanála

Case Reference:
ABP-308537-20

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: Demolition of existing structures on site, construction of 161 no. Build to Rent apartments and associated site works. Redforge Road, Blackpool, Cork.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Compliance with Development Plan and Local Area Plan objectives.

In accordance with section 5(5)(b)(i) of the Act of 2016 (as amended), the statement of consistency should have regard to the provisions of the current North Blackpool Local Area Plan 2011 (as extended), as well as the Cork City Development Plan 2015. Furthermore, in accordance with section 5(6) of the Act of 2016 (as amended), where the proposed strategic housing development would materially contravene the City Development Plan or North Blackpool Local Area Plan, as the case may be, other than in relation to the zoning of the land, then the statement

provided for the purposes of subsection (5)(b)(i) shall indicate why, in the prospective applicant's opinion, permission should nonetheless be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

2. Justification for proposed building height

Further consideration and / or justification of the documents as they relate to the development strategy for the site, particularly with regard to building heights.

Having regard to the scale and context of the proposed development, it should be clearly demonstrated that the proposed development satisfies the criteria set out in section 3.2 of the Urban Development and Building Height Guidelines for Planning Authorities (December 2018), particularly at the scale of the city and the district.

3. Treatment of Redforge Road

Further consideration and detailed design information in relation to the proposed modification and treatment of Redforge Road to include details of pedestrian facilities, shared surface / raised table on the road carriageway and provision of bus stops, whose design shall accord with the provision of the Design Manual for Roads and Streets (DMURS). Measures in this regard may require some amendment to the design or building line of the proposed structures.

Any works proposed as part of the proposed development shall be included within the application site boundary and, as may be required, the application shall be accompanied by evidence of landowner consent to such works.

4. Contaminated Land

Further information and consideration of the documents as they relate to the potential for contamination of soils on the application site, having regard to the historic uses thereon. An assessment of the site by a suitably qualified professional and the identification of appropriate site-specific mitigation and remediation measures to be undertaken as part of the proposed development should be submitted with any subsequent planning application. The findings of such assessment should inform other relevant assessments undertaken in respect of the proposed development.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A detailed assessment of Daylight, Sunlight and Overshadowing Impacts which should have regard to the provisions of the *Urban Development and Building Heights Guidelines for Planning Authorities* and the *Sustainable Urban Housing, Design Standards for New Apartments Guidelines for Planning Authorities*. The methodology adopted in such assessment shall be clearly described and any assumptions made therein should be fully justified. The assessment should extend to a wider range of units within the proposed development having regard to the orientation and aspect of the apartments. Notwithstanding the flexibility provided for in referenced guidance documents, where proposed residential units fail to achieve the minimum identified daylight reference values, an appropriate rationale and justification in respect of such residential units should be provided.
2. An analysis of wind microclimate in respect of,
 - i) Ground level public spaces with reference to pedestrian occupation and usability in the context of the scale of the buildings proposed.
 - ii) Residential balconies and roof top communal spaces having regard to the required comfort levels and function of those spaces.
3. A report specifically addressing the relationship between the proposed development and adjacent, existing and permitted, residential properties to the north and northwest, with particular regard to overlooking, overshadowing and potential for overbearing impacts thereon. The report should have regard to the permitted layout of development on adjoining lands.
4. A sustainable transport strategy for the development, which shall include a Transport Impact Assessment and site-specific Mobility Management Plan,

identifying specific measures to be implemented to achieve identified targets in respect of modal split.

Having regard to the lack of car parking provision within the proposed development, the application should demonstrate how the development will not give rise to over-spill parking in the surrounding area.

5. An inward noise impact assessment having regard to the proximity of the proposed development to the adjoining mainline railway which should include specific design mitigation measures to ensure that a satisfactory standard of amenity for future residents is achieved.
6. A housing quality assessment which provides the specific information required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should demonstrate how the proposed apartments comply with the planning policy requirements set out in those guidelines, including in particular SPPR 7 and SPPR 8 in relation to Build-To-Rent development.

A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted, which should include details of all external materials and finishes and durability of same.

7. The assessment of landscape and visual impacts should identify and assess potential impacts on views and vistas specified for protection in the Cork City Development Plan and referenced in the Local Area Plan. In addition, the assessment should have regard to potential impacts on views on the approach to the city from the north.
8. A Quality Audit Report in accordance with Appendix 4 of the Design Manual for Urban Roads and Streets, to include a Road Safety Audit, and a DMURS Street Design Audit.
9. A construction environmental management plan and a construction traffic management plan.
10. Measures to address the surface water drainage requirements of the planning authority as identified in their report of 25/11/2020.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- 1. Irish Water**
- 2. National Transport Authority**
- 3. Iarnród Éireann**
- 4. Córas Iompair Éireann**
- 5. Commission for Railway Regulation**
- 6. Transport Infrastructure Ireland**
- 7. Irish Aviation Authority**
- 8. The operator of Cork International Airport**
- 9. Cork Childcare Committee**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette
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March, 2021