



An
Bord
Pleanála

**S. 6(7) of Planning and
Development (Housing) and
Residential Tenancies Act 2016**

**Inspector's Report on
Recommended Opinion
ABP-308537-20**

Strategic Housing Development	Demolition of existing structures on site, construction of 161 no. Build to Rent apartments and associated site works.
Location	Redforge Road, Blackpool, Cork.
Planning Authority	Cork City Council
Prospective Applicant	Bellmount Developments Limited
Date of Consultation Meeting	22 nd February 2021
Date of Site Inspection	27 th January 2021
Inspector	Conor McGrath

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1.0 Introduction

Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

2.0 Site Location and Description

- 2.1. The subject site at Millfield Service Station comprises a stated area of 0.46ha, located adjacent to Blackpool District Centre, approx. 2km north of Cork City Centre. The site is currently in use as a petrol filling station and associated uses including car wash. The site has frontage of approx. 84m to Redforge Road to the east. To the north and northwest of the site, Millford Cottages comprise modest two-storey terraced cottages, of which five houses front onto Redforge Road while three face south to the site. To the northwest of the site, approx. 18 no. of the cottages are currently in derelict state and have permission for demolition and replacement.
- 2.2. To the west of the site, 4/5-storey commercial blocks back onto the site, while the Blackpool Centre multi-storey car park is located to the south. The Main Dublin – Cork railway runs north-south to the east of the site, atop an intervening overgrown embankment. There are proposals to develop a new railway station at this location, southeast of the site.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development comprises the removal of the existing petrol filling station and associated structures and construction of a new primarily residential development of 161 no. Build-to-Rent apartments in one L-shaped block. The block

steps from 4/6-storeys on the northern boundary adjoining Millford Cottages, to 19-storeys at the corner of Redforge Road and Blackpool District Centre access road to the south. A courtyard / landscaped open space is provided along the western side of the proposed block, accessible from the south and north and, as well as via a covered pedestrian route from Redforge Road. No car parking is provided within the development.

3.2. Key development parameters include:

Site Area	0.46 ha
Proposed Units	161 apartments <ul style="list-style-type: none"> – 75 x 1-bed (46.5%) – 85 x 2-bed (53%) – 1 x 3-bed (0.6%)
Density	350 units per hectare
Plot Ratio	4.39
Bedrooms	478 bedspaces
Height	4/6 to 19-storeys (approx. 62m)
Dual Aspect	44%
External amenity / open space	2,939.4 sqm (35%).

Other Uses	Floor	Area
Café/Bar	Ground	182-sq.m.
Offices	Ground	85.2-sq.m.
Shared Workspaces	Ground	109.41-sq.m.
	6 th	285.3-sq.m.
Meeting room	6 th	36.7-sq.m.
Gym	Ground	355.1-sq.m.

External Amenity Areas	Area
Internal Courtyard	1,172.9-sq.m.
Public Realm	547.1-sq.m.
4 th Floor Common Terrace	99.3-sq.m.
6 th Common Terrace 1	793.6-sq.m.
6 th Common Terrace 2	326.5-sq.m.
Total	2,939.5-sq.m.

4.0 Relevant Planning History

- PA ref. 06/30960: Permission granted for demolition of the existing petrol station and associated buildings and construction of 54 no. apartments & commercial / office in 7-storeys over basement car park, public and private landscaped gardens and associated site works.
- PA ref. 02/25821: Permission refused for a store extension to the rear of the petrol station on the basis of overdevelopment of the site, and impact on adjoining residential amenity.
- PA ref.00/24406 ABP ref. PL.28.121613: Permission refused for an extension to the service station on the basis of over-development of the site and impact on the visual amenities of properties in the vicinity.

Millford Cottages:

- PA ref. 07/32183: Permission granted for the demolition and replacement of 18 no. terraced houses to the northwest of the site, the re-establishment of the site datum level and associated site works.
- PA ref. 14/36238 ABP ref. 28.244628: Permission granted for alterations to PA ref. 07/32183 comprising revisions to site boundaries, site layouts and house designs. The decision was subject to a first party appeal against development contributions.

- PA ref. 18/38138: Permission granted in 2019 for the demolition of 18 no. dwellings and the construction of 18 no. terraced dwellings.

Sunbeam Site (north of Millford Cottages)

- PA ref. 178/37392: Permission granted to Respond Housing in 2018 for the demolition of existing industrial buildings and construction of 81 no. apartments, duplex and townhouses, and provision of a local community centre. This development is currently under construction.

Other:

- ABP ref. ABP-308049-20: Strategic Housing pre-application consultation in respect of 229 no. Build-to-Rent apartments and associated site works at the former Hewitt's Mills site, North City Link Road, Blackpool.

5.0 Section 247 Consultation with Planning Authority

Submissions provide details of a pre-planning meeting with the planning authority on 3rd February 2020, wherein the following matters were discussed.

- Relevant planning policy context.
- Long-term residential amenity and the need for community linkages.
- Transportation and parking strategy.
- Dependency on links to railway and walking / cycle connections to the services and city centre.
- Requirement for public realm upgrades to connect the site to its surroundings.
- Scale and massing of development and requirement to integrate into the surrounding area.
- Justification for height.
- Mix of ground floor uses.
- Drainage issues

6.0 Planning Policy

6.1. National and Regional Planning Policy

6.1.1. Project Ireland 2040 - National Planning Framework

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

Objective 2a A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

Objective 3b: Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

Objective 33 prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Key future growth enablers for Cork include:

- Identifying infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects.
- The development of an enhanced Citywide public transport system.

6.1.2. Southern Region's Regional Spatial and Economic Strategy (RSES)

The strategy is to build a strong, resilient, sustainable region. Measures include strengthening and growing cities and metropolitan areas. Key principles in developing the strategy include the need to provide an adequate supply of quality housing to meet existing and future demand, regenerating and developing existing built-up areas as attractive and viable alternatives to greenfield development.

RPO 10: Compact Growth in Metropolitan Areas

To achieve compact growth, the RSES seeks to:

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

Cork Metropolitan Area Strategic Plan (MASP)

The Blackpool and the Kilbarry area is identified as an Example Regeneration Area and a Strategic Employment Location, Mixed Use Employment and Regional Asset. There is a need for more housing to supplement and augment the defined strategic employment area.

Section 6.3.6.3 identifies Transport Priorities for the MASP region, including the provision of a new commuter rail station in Blackpool / Kilbarry. This will help to further regenerate the area and provide a focus for possible future development to make use of the proposed transport hub/railway station.

Section 7.2 identifies the Blackpool Valley area as having opportunities for significant mixed-use regeneration and residential and enterprise development providing a northern gateway to the city from the Limerick Road. This area is identified as a Strategic Residential Growth Node in section 7.3.

6.1.3. **Rebuilding Ireland – Action Plan for Housing and Homelessness (2016)**

The key objective for Pillar 4: *Improve the Rental Sector Key*, is to address obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents. Key actions include encouraging “build to rent” developments, designed with the occupants in mind – this might be equal sized bedrooms clustered around a central shared space, or the inclusion of amenities such as gyms and crèches and shared entertainment facilities.

6.2. **S.28 Ministerial Guidelines**

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submission from the planning authority, I consider that the directly relevant section 28 Ministerial Guidelines are:

- Urban Development and Building Heights, Guidelines for Planning Authorities (2018).
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual.
- Design Manual for Urban Roads and Streets (2020).
- Guidelines for Planning Authorities on Childcare Facilities (2001).
- Smarter Travel – A New Transport Policy for Ireland (2009-2020).
- The Planning System and Flood Risk Management (2009).

6.3. **Local Planning Policy**

6.3.1. **Cork City Development Plan 2015 - 2021**

Blackpool is identified as a District Centre within a Key Development Area. The Core Strategy notes that the Blackpool Valley, Kilbarry and the Old Whitechurch Road area, have opportunities for both 'brownfield' and 'greenfield' development for a range of uses. There is potential for mixed use development in Blackpool itself and a new Blackpool commuter rail station will improve access.

Chapter 14, Suburban Area Policies, identifies Blackpool as a major development opportunity. Objective 14.2 Blackpool / Kilbarry, include:

- a. To create a high quality, vibrant, distinct and accessible mixed-use urban centre, serving as an attractive northern gateway to the city and desirable destination for northside suburban communities, encompassing retail, commercial, employment uses, residential neighbourhoods, community and recreational facilities;

- c. To facilitate the development of an integrated public transport interchange centred on a commuter rail service and connecting bus services;
- d. To respect and enhance the built heritage and architectural character of the area, through the creation of a high-quality public realm and high standards of design;
- e. To preserve and enhance the sensitive and distinct landscape, visual character and biodiversity of the area and in turn provide for recreational uses, open space and amenity facilities;

The site is located within the North Central Suburbs and is zoned ZO 8 for District Centre Use: *To provide for and/or improve district centres as mixed-use centres, with a primary retail function which also act as a focus for a range of services.*

15.14 In addition to retail uses, District Centres will also provide a focus for other uses, including: retail warehousing, retail office, commercial leisure, services, (e.g. libraries, hotels, personal and medical services) and **residential uses**.

15.15 High quality urban design and availability of access by sustainable modes of transport will be a key factor in the development and extension of District Centres.

Housing Objective 6.7 Private Sector, supports the further expansion of the private owner occupier and private rented sectors.

Objective 6.1 residential strategic objectives include:

- (a) To encourage the development of sustainable residential neighbourhoods.
- (b) To provide a variety of sites for housing to meet the various needs of different sections of the population.
- (e) To encourage the use of derelict or underused land and buildings to assist in their regeneration.
- (f) To promote high standards of design, energy efficiency, estate layout and landscaping in all new housing developments.

Objective 6.8 Housing Mix, encourages the establishment of sustainable residential communities by ensuring a mix of housing and apartment types, sizes and tenures is provided.

Indicative plot ratios of 1.5 - 1.75 for District Centres are identified. In some cases higher plot ratios may be permitted adjoining major public transport termini and

nodes along rapid transit corridors, or to maintain townscape and building elevation profiles.

Building Height

16.25 The following building height categories are identified:

- Low-rise buildings (1-3 storeys in height);
- Medium-rise buildings (less than 32metres in height, 4-9 stories approximately).;
- Tall buildings (32m or higher, the approximate equivalent of a 10-storey building).

16.27 Within suburban areas low rise buildings will be considered appropriate. Buildings of 3-5 storeys will be considered appropriate in principle in major development areas and larger development sites, subject to normal planning considerations. In exceptional circumstances local landmark buildings may be considered with a height of up to 20-23 metres (approximately 6-7 storey equivalent). Building heights greater than this will only be considered where specifically identified in a local area plan.

16.37 Tall buildings will normally be appropriate where they are accessible to a high-quality public transport system which is in operation or proposed and programmed for implementation.

16.38 Tall buildings should always be of high design quality to ensure that they fulfil their role as strategic landmarks. As well as having a positive impact on Cork's skyline and built environment, tall buildings can have negative impacts also. These impacts will need to be assessed in any planning application.

Objective 16.7 Tall Building Locations, seeks to protect the special character of Cork City which have been identified as having potential for tall buildings. These are South Docklands & South Mahon.

There are a number of protected views in the area looking west south west to Farranferris Ridge (LT21, LT21A, LT21B)

Fewer car parking spaces are required in Zone 2a, in areas with a mass transit system at Kent Station and Blackpool Station, where the station is committed by means of an appropriate statutory consent.

Note: A S.49 Special Development Contribution Scheme in respect of suburban rail services includes the development of the railway station at Blackpool / Kilbarry. The scheme was updated for the period 2020-2022.

6.3.2. **North Blackpool Local Area Plan 2011**

(This LAP was extended for a period of 5 years to 2021).

Section 3.2 notes the designation of Blackpool as a 'key development area,' a 'key centre' (district centre) and a 'gateway' to the city. The over-riding objective is to create vibrant, high quality retail, residential and employment location served by an integrated public transport system. Section 3.8 identifies a need to increase the resident community in order to achieve a vibrant urban centre capable of sustaining local services and infrastructural developments.

Land-Use Zoning Objectives: District Centre

The District Centre is made up of the Blackpool Shopping Centre, Retail Park, **Millfield Service Station** and the former Sunbeam lands. The zoning objective is to provide for and/or improve district centres as mixed-use centres. The primary land use within the 'district centre' should continue to be comparison and convenience retailing. In order to protect and consolidate existing residential communities, new residential units should be focussed on the Mallow Rd - Redforge Rd area, integrating with the adjoining residential zoned lands.

Urban Design Strategy, Key Objectives include:

- Create a high-quality modern built environment, establishing a distinct character and sense of place appropriate to a key development area and city gateway.
- Integrate the plan area with the surrounding suburbs through a coherent network of new routes connecting to the existing road network.
- To protect and enhance the built heritage of the area.

Building heights

3.50 The plan area should be developed with low to medium-rise buildings. In general, medium-rise buildings (3 - 5-storeys) should be located within 500m of the planned rail station, and 2 & 3-storeys beyond the 500m radius. In exception, local landmark buildings could highlight important road junctions and civic spaces. Residential buildings in and around existing residential blocks should not exceed 4-storeys in height. Buildings in excess of 6-storeys are inappropriate.

Scale / Massing

3.51 The area within or around the district centre or central areas should be developed at a higher density than the outer extremes.

The planned rail service will support sustainable development, social inclusion and environmental protection. Its success is dependent on the development of this 'gateway' as a mixed-use centre at an appropriate density. The creation of direct pedestrian / cycle links is important to maximise modal shift. It is proposed that the rail embankment on Redforge Rd is retained and developed as a landscaped pedestrian access route to the rail station.

There is one protected view across the site from elevated lands at Kilbarry to the north, to Farranferris ridge (LT21).

Limiting the scale / height of development will protect the distinct landscape character and special amenity views of the area. The design and layout of streets highlights views of local landmarks such as Farranferris College, and the Church of the Resurrection, Knockpogue Avenue.

Section 4.7 identifies the site as being located within the sub-area: District Centre and Adjoining Lands - Millfield Service Station

The Millfield Service Station is an important interface site between the high density retail park and the low rise residences of Millfield Cottages and Terrace. It is important that the existing residential neighbourhoods on Redforge Rd be consolidated by medium density infill schemes of up to 3 & 4-storeys. Permission has been granted for a scheme of 42 residential apartments on this site. Redevelopment should create active building frontages in order to improve the

streetscape environment and attractiveness of the area. There is limited scope or need for additional retail floorspace. Residential and office-based employment should be the primary uses within new blocks. Commercial leisure uses, (cafes, public houses, restaurants), retail offices, and local commercial and community services will be encouraged at ground & first floor levels.

Building height

4.111 In general, the sub-area should be developed between 3 & 5-storeys, scale and massing increasing with proximity to the planned rail station. Exceptions should include local landmark buildings at important primary road junctions and civic spaces, up to 6-storeys.

Views and Prospects

The views and prospects of special amenity value such as Farranferris College as viewed from the northern / eastern side of the valley are important in terms of local identity and orientation. Views of the Church of the Resurrection, Fairhill and the Commons Ridge are of local importance.

Section 4.116 notes that the continued protection and setting of these views is a material consideration regarding the scale and massing of development within the sub-area and renders unacceptable the insertion of a tall building.

The subject site is identified in phase 1 of the implementation strategy.

6.3.3. **Cork Metropolitan Area Transportation Strategy 2020 (CMATS)**

The Inter-Urban cycle route proposals consist of links between the Metropolitan towns and the Cork City network. Key parts of the inter-urban network include Blackpool to Monard (via Old Mallow Road).

The N20 is identified as a core bus corridor. The Northern Orbital Bus Route serves Blackpool.

To support sustainable growth along an enhanced railway corridor, new railway stations are proposed at strategic locations, including Blackpool / Kilbarry. The overarching objective of the enhanced suburban rail services is to maximise development opportunities offered by the existing railway line in order to support a greater level of

coordination between land use and transport planning. The consolidation of development within an easily walkable and cyclable catchment of existing and proposed stations is critical to the success of the Strategy.

7.0 Submissions Received

7.1. Irish Water

In order to accommodate the proposed connection to Irish Water network, the existing watermain needs to be upgraded and the developer will be required to fund this network extension. A new connection to the existing wastewater network is feasible without upgrade.

Diversion of adjoining Irish Water infrastructure may be required. Structures or works over or in close proximity to Irish Water infrastructure that inhibit access for maintenance or endanger structural or functional integrity are not allowed.

8.0 Forming the Opinion

Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the planning authority submission and the discussions which took place during the tripartite consultation meeting.

8.1. Documentation Submitted

The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article 285 of the Planning and Development (Strategic Housing Development) Regulations 2017. This information includes, inter alia:

- Application cover letter which includes:
 - Details of Part V.
 - Gross floorspace of the development and schedule of accommodation.
 - Pre-Planning Minutes.

- Confirmation of Feasibility statement (COF) from Irish Water.
- Letter of Consent from Cork City Council.
- Completed Application Form and fee.
- Planning and Design Statement.
- Statement of Consistency.
- Schedule of Areas.
- Schedule of Drawings.
- OS Maps at 1:1000.
- Architectural plans, sections and elevations.
- Housing Quality Assessment.
- Landscape and roof garden plans.
- Landscape and Visual Impact Assessment.
- Photomontages.
- Engineering Services Report.
- Engineering Drawings.
- Flood Risk Assessment.
- Daylight Sunlight Report.
- Mobility Management Plan.
- Summary of EclA and AA Findings to Date.
- Section 5(5)(ii) Report - description of the development and possible effects on the environment.

In accordance with section 5(5)(b) of the Act of 2016, the documentation includes a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000.

8.2. Planning Authority Submission

A submission from Cork City Council in accordance with Section 6(4)(b) of the 2016 Act was received on 25/11/2020. The submission includes a statement of the planning authority's opinion, copies of the record of s.247 consultations and details

of relevant planning history. The report containing the opinion of the planning authority makes the following points:

Statutory Context Conclusion

- The scheme is supported in principle in terms of strategic policy objectives.
- It accords with objectives in respect of compact development and regeneration of this area in line with the main aims of CMATS.
- The proposed scale and density are queried, given the size of the site and adjoining low rise residences.
- The development may be premature pending the Building Height and Tall Buildings Study which is currently underway and which will inform the Draft City Development Plan 2022-2028.
- The scheme complies with the zoning objectives for the site but the inclusion of further active uses such as a retail might increase vibrancy.
- The North Blackpool LAP is not referenced in the Statement of Consistency.
- Further consideration of the public realm and the requirement for building line set-back for strategic transport or detailed design reasons, is required.
- The appropriateness of the Build-to-Rent model is queried given the housing and tenure mix in the area and the requirement of Objective 6.8.
- The developer should demonstrate that the proposed residential amenities and facilities are appropriate for the intended rental market.

Design

- This is not a gateway location or landmark site. It is effectively a backland site, which is not an appropriate location for a tower that will dramatically exceed the height of the established landmark building to the west.
- The scale of development proposed for this site should be reviewed.
- The tower will impact on views throughout this part of the city and further assessment of views from the north should be undertaken.
- The level of detail provided is not adequate to assess the development against the Building Height Guidelines. A specific response to the guidelines is required.
- The proposal does not accord with the massing policy of the LAP.
- The building mass and scale is well conceived within a satisfactory height to length proportion.

- The solid to void relationship creates satisfactory composition, both in the vertical façade of the tower and horizontally in the six-storey facade.
- The use of brick as a cladding material and its detailing is commended.
- It could be argued that this is a landmark building for the Blackpool Retail Park and expanding District Centre.
- Along with an associated public realm strategy it could form linkages through this retail complex and link with an existing landscaped public amenity space on Common's Road.
- The public realm relates well to Redforge Road and the existing entrance road to the retail complex.
- As the railway embankment is outside the site boundary, it would be difficult to incorporate the landscaping proposals into the development.

Residential Amenity

- The impact of the proposed development upon low-rise Millfield cottages to the north is of concern.
- The daylight / sunlight study should include assessments of proposed ground floor open space and the proposed apartments which are predominately single aspect in design, particularly on the eastern elevation.
- Residential amenity should be considered given the proportion of single aspect apartments and reliance on access over long corridors.
- An assessment of noise from the adjoining railway should be undertaken.
- Compliance with CCDP requirements for public and communal open space should be clarified.
- The semi-public open space displays minimal potential for possible linkages.
- Consideration should be given to the wider needs of the area in terms of childcare provision and consultation with the Cork City Childcare.

Access and mobility

- Bus services run nearby at 20/30 minute intervals. There is uncertainty regarding improved bus routes in the area under CMATS.
- The proposed railway station at Blackpool/Kilbarry is a long-term objective and there is no timeline for implementation.

- Cycle infrastructure is poor and there is no timeline for the proposed CMATS cycle route between Blackpool and the city centre.
- There is a lack of detail on pedestrian and cycle infrastructure, including road crossings, which must be improved to encourage use of public transport.
- The design should integrate with any proposed pedestrian/cycle connections to the station.
- Given deficiencies in transport services and sustainable transport infrastructure there is a concern that residents will not utilise sustainable travel with overspill parking in the adjoining retail car park leading a car centric development.
- A sustainable transport strategy should prevent such parking and a Mobility Manager should be appointed to ensure the mobility targets are met.
- Greater detail is required in terms of infrastructure associated with each mode of transport.
- A traffic and transport assessment for the construction traffic should be provided.
- Bicycle parking should comply with standards set out in Apartment Design Standards.
- The Treatment of Redforge Road should accord with DMURS. Detail of the proposed set-down area is required, avoiding use for residential parking.
- Details to be submitted include a demolition / construction management and traffic management plan, a development phasing schedule, full Road Safety Audit and public lighting details.

Drainage

- No storm water attenuation has been provided. Attenuation to greenfield rather than existing run-off rates is required.
- Any upgrade of Redforge Road should address existing drainage deficiencies.
- Floor levels are in accordance with guidance on flooding.
- A Construction and Environmental Management Plan should address how any contamination will be addressed and a decommissioning method statement for the petrol station should be provided.

Housing

Part V proposals are acceptable to the Housing Directorate.

CONCLUSION

- The subject site is currently underutilised.
- There is capacity for high-density residential development as part of a mixed used development incorporating retail to accord with the LAP and development plan policies and objectives.
- A greater mix of ground floor uses may be appropriate, including retail uses.
- While a new suburban railway station is planned, there is no time frame for its construction.
- There are concerns regarding the scale of development at a location that does not have gateway or landmark status.
- A full SHD application will require full and rigorous assessment against the criteria set out in the Urban Development and Building Heights Guidelines.
- A Daylight / Sunlight Impact Assessment and a Noise Impact Assessment are required to assess impacts on the amenities of residents in Millfield Cottages and within the development.

8.3. The Consultation Meeting

I refer to the record of the consultation meeting held on 22st February 2021, commencing at 10am, via Microsoft Teams. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting. The main topics raised for discussion at the tripartite meeting were as follows:

- Development Principle
- Design / Height Strategy
- Residential Amenity, incl. Climate & Daylighting.
- Transportation
- Public realm
- AOB

In relation to the Development Principle, An Bord Pleanála sought further discussion / clarification on the following:

- The acceptability of the proposed mix of uses for the site.
- The status of the North Blackpool LAP and its evaluation as part of the Statement of Consistency.
- Compliance with the policies and objectives of the Development Plan and LAP and any potential requirement for a statement of material contravention in respect of the proposed development.

In relation to the Design / Height Strategy, An Bord Pleanála sought further elaboration in relation to the following:

- Justification for the design and height proposed for this site, at the scale of the city and the district.
- Public transport infrastructure supporting development of the height and scale proposed.

In relation to Residential Amenity, incl. Climate & Daylighting, An Bord Pleanála sought further information on the following:

- The status of development proposals on adjoining lands.
- Clarification of the approach to the assessment of daylight and sunlight.
- The reduced levels of daylighting to proposed residential units forecast, particularly to lower level, south facing units.
- The requirement for a micro-climate assessment of the proposed development.

In relation to Transportation, An Bord Pleanála sought further discussion / clarification on the following:

- The status of proposals for improved public transport services in the area, particularly improved bus services and Blackpool / Kilbarry train station.
- Compliance with the criteria of the Building Height Guidelines, particularly regarding transport infrastructure supporting such development.
- The need for a site-specific Mobility Management Plan for the development.

In relation to the Public Realm, An Bord Pleanála sought further information / clarification on the following:

- The distinction between communal and public open spaces, and the inclusion of public footpaths within open space calculations.
- Details of pedestrian connectivity and proposed improvements to the public realm along Redforge Road.
- The design of interventions to the carriageway along Redforge Road.
- The extent of the red line boundary of any application.

With regard to Any Other Business, An Bord Pleanála sought further information on the following:

- The potential for contamination of the site and a requirement for site specific assessments in respect thereof.
- Drainage issues raised in the planning authority submission.

9.0 **Conclusion and Recommendation**

Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the planning authority and of Irish Water, and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the s.28 Ministerial Guidelines, and local policy, via the statutory plan for the area.

Having regard to all of the above, I recommend that further consideration and/or possible amendment of the documents submitted are required at application stage in respect of the design and scale of development, details of which are set out in the Recommended Opinion.

Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act **requires further consideration and amendment** in order to constitute a reasonable basis for an application under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.”

10.0 Recommended Opinion

An Bord Pleanála refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application.

Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority and Irish Water, An Bord Pleanála is of the opinion that the documentation submitted **requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.**

In the opinion of An Bord Pleanála, the following issues need to be addressed in the documents submitted to which section 5(5) of the Act of 2016 relates 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.

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.

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.

Conor McGrath

Senior Planning Inspector

01/03/2021