



h w p l a n n i n g

## Planning Statement and Response to **An Bord Pleanála's Opinion**

Proposed Strategic Housing Development at the Former  
Tedcastles Site, Centre Park Road, Cork

Tiznow Property Company Limited (Comer Group Ireland)

April 2022

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# 01 Proposed Development & Context

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## 01.1 Site Location and Context

The c. 4.86 ha subject lands, known as the Former Tedcastles Site, is situated in the south docklands area located to the east of Cork City. The corner site is bound to the south by Centre Park Road, to the north by the Marina and Shandon Boat Club and to the west by former ESB lands. A portion of the Marina and Centre Park Road are also included in the application site to facilitate engineering and landscaping connections to existing infrastructure.

The Former Ford Factory site is located further south (which was recently permitted permission for 1,002 no. residential units, 5 no. retail units, childcare facilities and community resource spaces (ABP Ref: APB-309059-20 refers).

The lands subject to this application form part of a larger masterplan with a total area of c. 8.65 ha which extends further to the south and west. The northern edge of the masterplan is bound by the banks of the River Lee which runs in an east – west direction. The Passage West Greenway (former railway lines) is located along the riverbank providing pedestrian and cycle linkages from the Marina towards Passage West (via Blackrock, Mahon and Rochestown).

The recently completed Marina Park, a 32 ha city park, is located to the north-east of Marquee Road. Structures and lands to the west were formerly occupied by the ESB.

The lands subject to this application form part of a larger landholding and masterplan which extend further to the north, south and west. The northern edge of the masterplan is bound by the banks of the River Lee and the Marina which runs in an east – west direction. The Marina is principally pedestrianised with local vehicular access and carparking for the Shandon Boat Club, River Lee Rowing Club and Pairc Uí Chaoimh. The Passage West Greenway (former railway lines) is located along the riverbank providing pedestrian and cycle linkages from the Marina towards Passage West (via Blackrock, Mahon and Rochestown). The Design Statement prepared by C + W O'Brien Architects provides an in-depth analysis of the wider masterplan area.

The South Docklands are characterised by a mix of commercial and industrial buildings in various phases of occupation, with more recent developments found along Monahan Road to the south and towards Pairc Uí Chaoimh to the south-east. The site currently comprises the remnants of former industrial structures and hard standing. There are open watercourses along the north and south of the site. The Former Tedcastles Site retains a singular vehicular and pedestrian access from Marquee Road. The site boundaries largely are overgrown and unmaintained.



Figure 01.1 Image of Centre Park Road (Google Maps)



Figure 01.2 Image of the Subject Lands when reviewed from Centre Park Road (left) and the Marina (right)



Figure 01.3 Image of the Marina to the north of the Site

Centre Park Road and Monahan Road connect to the N27 to the west via Albert Quay, Albert Road and Marina Terrace providing excellent accessibility to the wider road network. Existing and proposed public transport infrastructure, including the implementation of the high frequency public transport corridor along Centre Park Road contribute to the attractiveness of the subject site for high density development.

The subject site is served by an existing hourly bus service on Centre Park Road (less than 300m from the subject site) from Horgan's Quay to Mahon Point shopping centre (Route no. 212). In the assessment of the Former Ford Site, the Inspector noted the more frequent bus services available along Blackrock Road (Route no. 202 and 202A Hollyhill (Apple) to Mahon which operates a c. 20 no. minute frequency. The Blackrock bus stop is located c. 800 m to the south, a 10 no. minute walk. The extract below from the Mobility Management Plan prepared by Arup demonstrates the excellent public transport catchment of the proposed scheme during AM peak hours.

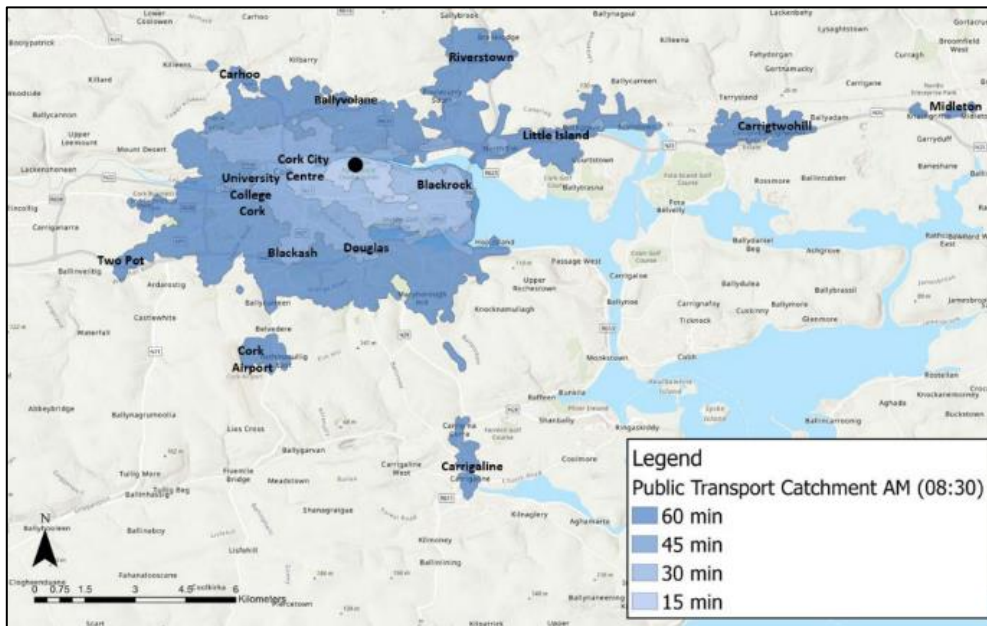


Figure 01.1 Extract from Mobility Management Plan showing the Public Transport Catchment Area (Arup)

The high capacity light rail public transport corridor from Mahon to Ballincollig via Centre Park Road will further enhance the suitability of the docklands for high density development.

### 01.1.2 PLANNING POLICY CONTEXT

The subject lands form part of the South Dockland Local Area Plan 2008, albeit outdated the currently adopted Cork City Development Plan 2015 - 2021 has regard to the plan. The LAP acknowledges that:

*“The redevelopment of the North and South Docks as a major new mixed use quarter is the most significant sustainable development opportunity for the City Region.”*

A key aspiration of the City Development Strategy is to ensure the complementary extension and seamless integration of the City Centre with the Docklands through supporting connectivity and creating:

*“a new City Quarter of vibrant mixed uses of sufficient scale to bring about an urban transformation in Cork City and develop a city of European significance.”*

The Statement of Consistency and Material Contravention Statement prepared by HW Planning provide further discussion on relevant policy objectives at national, regional and local levels.



### 01.1.3 ZONING OBJECTIVE

The subject site is located on lands zoned ZO 16 – Mixed Use, ZO 14 Public Open Space and ZO 9 – Neighbourhood Centres. Lands to the north are also designated as an area of High Landscape Value.

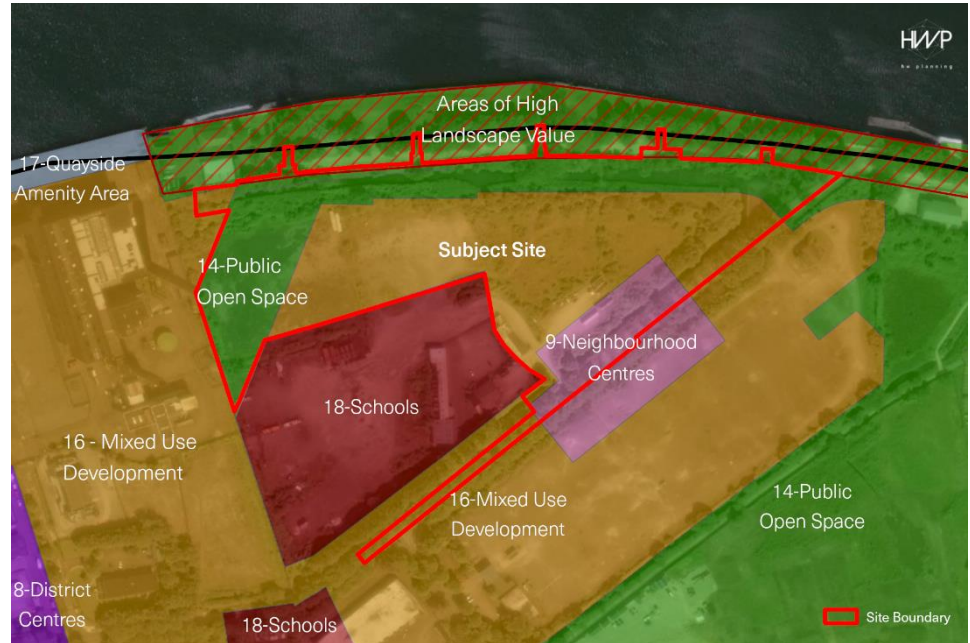


Figure 01.2 Zoning Map with Subject Site outlined in Red

The Strategic Housing Development subject to this application will provide a mix of uses that are consistent with the objectives of mixed use and neighbourhood centre zoning. The inclusion of this area of Public Open Space will facilitate a seamless integration with the Marina to the north and provide valuable pedestrian connections for existing and future users of the South Docklands. Adjoining lands to the western corner of the Tedcastles Site are zoned ZO 18 – Schools in the Development Plan. The Design Team have fully considered the future development potential of these lands and their future integration with the application site.

## 01.2 Proposed Development

The development will consist of demolition of existing structures and the construction of a strategic housing development of 823 no. apartments in 6 no. buildings ranging in height from part-1 to part-35 no. storeys over lower ground floor level. The development will contain 282 no. 1 bedroom apartments, 414 no. 2 bedroom apartments and 127 no. 3 bedroom apartments.

All blocks will contain ancillary commercial areas including: 3. no café/restaurants and 2 no. public houses (1,089 sq m); 7 no. retail units, a convenience retail store which includes the sale of alcohol for consumption off premises, a library, medical centre, pharmacy, post office and dentist (2,484 sq m); and 2 no. childcare facilities (662 sq m). The development will also contain supporting internal resident amenity spaces (2,760 sq m) and external communal amenity spaces at podium and roof terrace levels.

Block A is part-3 to part-35 no. storeys over lower ground and will contain a retail unit split over 2 no. levels, restaurant, convenience retail store, a public house over 2 no. floor levels, 174 no. apartments and ancillary internal and external resident amenity spaces.

Block B proposes part-8 to part-10 no. storeys over lower ground and comprises a public house, café, retail unit and ancillary resident amenity at ground floor level. There are 95 no. apartments provided at upper levels.

Block C ranges in height from part-1 to part-6 no. storeys over lower ground and comprises a medical centre at lower ground and ground floor levels, a library over 2 no. floor levels, 2 no. retail units, ancillary resident amenity and 75 no. apartments.

Block D is part-1 to part-10 no. storeys over lower ground and contains a creche, café/restaurant, retail unit and internal and external ancillary resident amenity spaces at lower ground and ground floor levels. 171 no. apartments are provided at the upper levels.

Block E ranges in height from part-1 to part-6 no. storeys over lower ground and contains a pharmacy, post office, 2 no. retail units and dentist split over 2 no. levels and 95 no. apartments at upper levels.

Block F is part-1 to part-10 no. storeys over lower ground and consists of a creche at ground floor level, ancillary resident amenity spaces and 213 no. apartments.

Pedestrian bridges are provided from the Former Tedcastles Yard to the Marina which includes the removal of 13 no. existing car parking spaces on the Marina to facilitate pedestrian connections to existing pedestrian infrastructure.

The proposed development also provides for hard and soft landscaping, boundary treatments, public realm works on Centre Park Road, car parking, bicycle stores and shelters, bin stores, signage, lighting, sprinkler tank, plant rooms and all ancillary site development works above and below ground. Vehicular access to the proposed development will be provided via Centre Park Road.



Figure 01.3 Aerial CGI of the Proposed Scheme (Urban 3D)

The key site statistics pertaining to this application are provided below for ease.



Table 01.1. Key Statistics of the Proposed Development

Key Figures of the Proposed SHD Development	
No. of Units	823 282 one bed units – 34 % 414 two bed units - 51 % 127 three bed units – 15 %
Site Area	4.86 ha (48,591 sq m)
Net Developable Site Area	2.8 ha (28,005 sq m)
Density	294 no. units per ha (net) 169 no. units per ha (gross)
Height	Part-1 to part-35 no. storeys
Plot Ratio	3.26 (net) 1.88 (gross)
Site Coverage	34 %
Creche	662 sq m in addition to 247 sq external play area
Commercial – Café/Restaurant, Retail	4235 sq m
Public Open Space Provision	4,695 sq m – 17 % - Developable Site Area (Additional 15,000 sq m within red line boundary)
Communal Open Space Provision	5,452 sq m
Car Parking Spaces	278 no. car parking spaces comprising of: 268 no. resident car parking spaces – 0.33 car parking spaces per unit 10 no. visitor car parking spaces
Bicycle Parking Spaces	1,718 no. resident bicycle parking spaces and 412 no. visitor bicycle parking spaces

### 01.3 Planning History

Cork City Council's online planning application database does not have any record of previous applications on the subject lands.

The former industrial use of the South Docklands is largely redundant and presents significant opportunities for the delivery of a new urban quarter in Cork City. This is reflected in the emerging pattern of development for the South Docklands.

A summary of nearby applications of note are provided at Appendix A of this document for reference.

An Bord Pleanála recently granted permission for a Strategic Housing Development on lands known as the Former Ford Factory site (ABP-309059-20) located to the east of the application site, which is separated by Marquee Road. The scheme comprises the construction of 1,002 no. residential units, resident amenity spaces and commercial and community facilities (4,493.2 sq m) in 12 no. blocks ranging in height from 4 – 14 no. storeys. The permitted scheme has set a precedent for the future development character of this area of the South Docklands including the scale, height and massing. In designing the proposed development at the Former Tedcastles site, the Design Team have been cognisant of the assessment of the permitted scheme where the Inspector was of the opinion that:

*“The proposed development is regarded as acceptable in principle on these zoned lands proximate to the city centre. The area has been long identified as being of strategic importance for the consolidation of growth in the city and the development is aligned with strategic planning, transport and drainage policies for the area.”*

The key site statistics pertaining to the permitted scheme are provided below for comparison.

Table 01.2. Key Statistics of the Permitted Former Ford Factory Site

Key Figures of the Permitted Ford Ford Factory Site	
No. of Units	1,002 no. units 38 studios – 3.8 % 312 one bed units – 31.1 % 503 two bed units – 50.2 % 149 three bed units – 14.8 %
Site Area	4.05 ha
Net Developable Site Area	3.64 ha
Density	275 no. units per ha (net) 247 no. units per ha (gross)
Height	4 to 14 no. storeys
Plot Ratio	2.89 (net)
Commercial – Café/Restaurant, Retail, Plant	4,493.2 sq m
Public Open Space Provision	5,868 sq m – 16 %
Communal Open Space Provision	7,064 sq m
Car Parking Spaces	448 no. car parking spaces 0.39 car parking spaces per unit
Bicycle Parking Spaces	1,851 no. resident bicycle parking spaces and 502 no. visitor bicycle parking spaces

A summary of nearby applications of note are provided at Appendix A of this document for reference.

#### 01.4 Pre-Planning Consultations

A Section 247 pre-planning consultation with Cork City Council took place on the 22nd July 2021 where the Design Team presented a masterplan for the Former Cork Warehouse site and Former Tedcastles site.

A subsequent Section 247 pre-planning meeting was requested on the 3rd August 2021 and revised documents submitted in response to the issue raised by the Planning Authority at the initial meeting and to outline the proposed planning strategy for the delivery of the overall project.

A tripartite consultation meeting took place on 20<sup>th</sup> December 2021 between An Bord Pleanála, Cork City Council and the Design Team. An Bord Pleanála subsequently issued a

Notice of Pre-Application Consultation Opinion (ABP-311723-21) on 22<sup>nd</sup> December 2021. Section 4.0 of this report provides a comprehensive response to the items raised by An Bord Pleanála in their opinion.

PL 13/2021 refers to the transitional arrangements in relation to the expiry of the SHD process and their replacement with a new Large-scale Residential Development application process.

*“SHD prospective applicants/ developers who have formally commenced consultations with the Board and are awaiting an SHD opinion on the commencement of the Act (17 December 2021) will have 16 weeks to submit an SHD application to the Board from the date of receipt of the SHD opinion.”*

The appropriate period to lodge a SHD for the subject site is therefore 13<sup>th</sup> April 2022. The Design evolution and key changes implemented throughout the process are detailed in the Design Statement prepared by C + W O'Brien Architects.

# 02 Planning Policy Context

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As required under the Planning and Development (Strategic Housing Development) Regulation 2017, a Statement of Consistency has been prepared by HW Planning and is submitted with this application for a Strategic Housing Development. The Statement of Consistency demonstrates how the proposed development is consistent with the relevant National, Regional and Local policies and Section 28 Ministerial Guidelines. An overview of the key planning policies and objectives pertaining to the subject lands is provided in this section. A Material Contravention has also been prepared to address the contravention of any local planning policy objectives.

## 02.1 Project Ireland 2040: National Planning Framework

The National Planning Framework is an overarching policy framework that informs how Cork City and suburbs will achieve the expected growth to 314,000 people by 2040 through the implementation of the 10 no. key strategic outcomes. Most notably compact growth, sustainable mobility and the transition to a low carbon and climate resilient society.

National Policy Objectives 2a, 3b, 4, 8, 32, 33 are pertinent to achieving the proper and sustainable growth of Cork's South Dockland area.

## 02.2 Regional Spatial and Economic Strategy for the Southern Region (RSES)

The RSES is positioned as an implementing strategy for the NPF that aims to reflect the specific needs of the regions. A key principle in developing the strategy for the RSES is provide more sustainable choices and options for people, businesses and communities that can positively influence more sustainable patterns of living and working which benefit a greater cohort of the population and make the economy more resilient.

In specific reference to the South Docklands, the RSES outlines the below key objectives and infrastructure priorities for the area:

- *Potential Residential Yield: 9,500 residential units, 9,500 jobs based on 920,000 sq m office space and additional jobs from services, retail, restaurants etc.*
- *Delivery of a Light Rail system to unlock the potential for high-density development.*
- *River Crossings.*
- *Upgrades to Monahan Road, Centre Park Road, and bridge approach roads.*
- *Flood Relief Measures.*
- *Brownfield site remediation.*
- *Cross-river watermain to serve South Docklands.*



## 02.3 Cork Metropolitan Area Transport Strategy (CMATS)

The Cork Metropolitan Transport strategy (CMATS) has been published in the context of the National Planning Framework which envisages that Cork will become the fastest growing city region in Ireland in the coming years.

The provision of Light Rail System from Ballincollig to Mahon via Centre Park Road will be a focal point of the public transport corridor that will enable the growth of population, employment health and education uses as envisaged by the NPF 2040. The Draft BusConnects Network as promoted within CMATS has undergone public consultation with the final New Bus Network due to be published later in 2022.

## 02.4 Cork City Development Plan 2015 - 2021

The subject application will be determined prior to the adoption of the Draft Cork City Development Plan 2022-2028 in August 2022 therefore the Cork City Development Plan 2015-2022 is the relevant local planning policy pertaining to the subject application. The Cork City Development Plan (CCDP) stipulates that:

*“Cork City Docklands represent the biggest development opportunity for Cork City and the CASP (Cork Area Strategic Plan) area over the Plan period and beyond, its redevelopment and renewal being of regional and national significance. The vision for Docklands is that of a vibrant mixed use and socially inclusive urban quarter that will capitalise on the intrinsic advantages of the area.”*

The CCDP identifies that:

*“the redevelopment of the North and South Docks as a major new mixed use quarter is the most significant sustainable development opportunity for the City Region. It has an attractive waterfront location adjoining the City Centre which can be well served by public transport.”*

Furthermore, noting that:

*“the delivery of Docklands development is critical to the city achieving its population and employment targets and to the implementation of the CASP update strategy as a whole.”*

Section 13.79 of the CCDP asserts that:

*“With appropriate investment, the South Docks area is capable of supporting a large residential and working population, however the achievement of this will be dependent on the relocation of the Port of Cork and the SEVESO site and the delivery of the necessary infrastructure to support development including bridge and road access, education, cultural and social/community uses and polices in the city region to direct development to this potential new urban quarter. The redevelopment of the South Docks is likely to extend for a considerable period beyond the lifetime of this Plan.”*

The lands subject to this application will form part of the wider redevelopment of the South Docklands to deliver a new urban quarter in Cork City. The Design Statement prepared by C + W O'Brien Architects presents a masterplan for the wider area which extends north as far as the banks of River Lee and encompassing the lands zoned ZO 18 - schools both

north and south of Centre Park Road. The masterplan has been principally informed by discussions with the Department of Education, surrounding planning history and recently published CMATS. Section 4.0 of this report provides a response to the An Bord Pleanála Opinion which sought additional information on how the development would integrate with the adjacent ZO 18 – School zoned lands.

## 02.5 South Docklands Local Area Plan 2008

Albeit the South Docklands Local Area Plan, 2008 expired in 2018, the key aspirations of the LAP are still largely relevant. The objectives of the LAP include the following:

- A new identity for the docklands;
- Places for people Places that are inclusive;
- Places that have a mix of uses;
- Places for learning;
- New places for work;
- New places for play; and
- A sustainable place.

The objective of the Mixed Use Development zoning designation in the LAP was to promote the development of mixed uses to ensure the creation of a vibrant urban area, working in tandem with the principles of sustainable development, transportation and self-sufficiency. In reference to the lands zoned Neighbourhood Centre, the LAP aims to *“protect, provide for and or/improve the local retail and services function of the South Docks area.”*

## 02.6 Draft Cork City Development Plan 2022 – 2028

The Draft Cork City Development Plan is due to be adopted in June 2022 and will come into effect in August 2022. An Bord Pleanála will be required to determine the application prior to the forthcoming Development Plan coming into effect therefore the current Cork City Development Plan 2015-2021 is the relevant Development Plan to assess the proposed development.

# 03 Planning Considerations

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The subject lands are located in a sustainable and well-connected location that is suitable for compact and high density urban residential development. The proposed scheme has been cognisant of the evolving context of the South Docklands including the ZO 18 – School zoned lands on adjacent lands. The mixed-use scheme permitted on the Former Ford Factory Site to the east (ABP-309059-20) and the future Centre Park Road upgrade project are key considerations in the design of the proposed scheme.

## 03.1 Principle of Development

The subject lands are zoned objective ZO 16 – Mixed Use Development, ZO 9 – Neighbourhood Centre and ZO 14 – Public Open Space in the Cork City Development Plan 2015 -2022. The majority of the site is zoned ZO 16 – Mixed Use Development where the objective is:

*“To promote the development of mixed uses to ensure the creation of a vibrant urban area, working in tandem with the principles of sustainable development, transportation and self-sufficiency.”*

A range of uses are permitted on ZO 16 – Mixed Use lands including residential and other uses as set out below:

*“general offices, conference centre, third level education, hospital, hotel, commercial leisure, cultural, residential, public institutions, childcare services, business and technology/research uses (including software development, commercial research and development, publishing, information technology, telemarketing, data processing and media activities) and in addition, local convenience stores/corner shops and community/civic uses.”*

An area of the site fronting onto Centre Park is zoned ZO 9 which has a stated aim:

*“To protect, provide for and/or improve the retail function of neighbourhood centres and provide a focus for local services.”*

Section 15.16 of the Development Plan directs that:

*“The primary purpose of these centres is to fulfil a local shopping function, providing a mix of convenience shopping, lower order comparison shopping, and local services to residential and employment areas...”*

Furthermore, stating that:

*“Residential uses are also acceptable within this zone.”*

The proposed development will provide 823 no. apartments in 6 no. buildings ranging in height from part-1 to part-35 no. storeys over lower ground floor level. The development will contain 282 no. 1 bedroom apartments, 414 no. 2 bedroom apartments and 127 no. 3 bedroom apartments. Ancillary commercial uses will be provided at the lower levels of the development to deliver active and vibrant frontages, particularly fronting Centre Park Road. The mix of commercial uses proposed comprise food and beverage, local retail and neighbourhood centre uses including 2. no café/restaurants, 2 no. public houses, 7 no. retail units, a convenience retail store, a library, medical centre, pharmacy, post office, dentist and 2 no. creches. In addition, active resident amenity spaces are strategically proposed along the internal spine road and fronting open spaces to create passive surveillance and active frontages.

In regard to the non-residential element of the recently permitted Former Ford Factory scheme, there were 5 no. retail units, 1 no. Montessori school, 1 no. creche, a medical centre, bar, café, performance area and 2 no. community resource spaces.

The Inspector in assessing the permitted scheme on the Former Ford Factory Site noted that:

*“No split or mix of uses for Z0 16 lands is specified in the development plan and the proposed uses are all acceptable thereon. The previous LAP for the South Docks has expired and the planning authority submission suggests that the emerging strategy for the eastern docklands area will be predominantly residential in nature.”*

The proposed residential and commercial elements of the proposed Strategic Housing Development are located on mixed use and neighbourhood centre zoned lands where residential uses and ancillary non-residential uses are permitted in principle. The mix of non-residential will provide a vertical and horizontal mix of uses including active ground floor uses (i.e., café/ retail/ resident amenity) and vibrant frontages at podium level to deliver a vibrant urban area. The C + W O'Brien Architectural Design Statement identifies 4 no. character areas within the proposed scheme:

- Neighbourhood Centre;
- Village Centre;
- Riverfront and Internal Street; and
- Public Open Space

While all areas have ancillary commercial areas, the active uses are principally located in the Neighbourhood Centre fronting Centre Park Road, as illustrated in the extract below.

12.8.1  
Detail Plan -  
Lower Ground



- Key**
- ▲ Pedestrian Access to Plaza
  - ▲ Pedestrian Access to the River
  - ▲ Residential Access to Corridor
  - ▲ Residential Access to Amenity
  - ▲ Escape Exit
  - ▲ Creche Access
  - ▲ Food / Beverage Access
  - ▲ Retail Access
  - ▲ Neighbourhood Centre Access
  - ▲ Vehicular Access
  - Public Lift
  - Accessible Lift to Parking
  - Outdoor Seating
  - Services / Plant
  - Creche
  - Bki Storage
  - Bicycle Storage
  - Accessible Parking
  - Visitor Parking
  - Set-Down
  - Bin Collection Point



Figure 03.1 Extract from C+W O'Brien Architectural Design Statement

A portion of the site to the north and west is zoned Z0 14 – Public Open Space and has been included within the application to ensure a seamless integration with surrounding area. The objective of Z0 14 Public Open Space is:

*“To protect, retain and provide for recreational uses, open space and amenity facilities, with a presumption against developing land zoned public open space areas for alternative purposes, including public open space within housing estates.”*

The lands zoned public open space (15,000 sq m) are not counted as part of the provision of public open space serving the development and are located outside the net developable area. It should also be noted that the delivery of development is not dependent on the zoned public open space but is included within the site boundary as a planning gain serving the wider South Docklands.

The Marina to the north of the Former Tedcastles Site is designated as an Area of High Landscape Value where the stated aim is to:

*“To conserve and enhance the character and visual amenity of Areas of High Landscape Value (AHLV) through the appropriate management of development, in order to retain the existing characteristics of the landscape, and its primary landscape assets. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape. There will be a presumption against development where it causes significant harm or injury to the intrinsic character of the Area of High Landscape Value and its primary landscape assets, the visual amenity of the landscape; protected views; breaks the existing ridge silhouette; the character and setting of buildings, structures and landmarks; and the ecological and habitat value of the landscape.”*

This area has been included to provide sustainable pedestrian connections and facilitate anticipated desire lines towards the Marina, Marina Park and Passage West Greenway.



The proposed development will not negatively impact on the character and visual amenity of the Area of High Landscape Value. An LVIA has been prepared by Park Hood Landscape Architects and is enclosed as part of the EIAR compiled by Arup.

### 03.2 Building Height

The proposed development comprises 6 no. Building ranging in height from a part-1 to part-35 storey building. A key component of the architectural design is to ensure that a high level of residential amenity is achieved without compromising the development potential of adjoining lands. The development proposes varying heights above podium level to achieve visual relief throughout the development. The variety in heights at appropriate locations also avoids the creation of monotonous elevations. Figure 03.1 illustrates the proposed height strategy which provides taller elements to the north of the site and identifying the neighbourhood centre on Centre Park Road. The 35 no. storey element of Block A provides architectural interest at the eastern prow of the site and acts as key way finding measure.



Figure 03.2 Extract from the Design Statement identifying the Proposed Height (C+W O'Brien Architects)

The proposed part-1 to part-35 storey development has been designed to appropriately respond to the recently permitted part-4 to part-14 storey scheme to the east of the subject lands (ABP Ref: ABP-309059-20), as shown in the extract below.

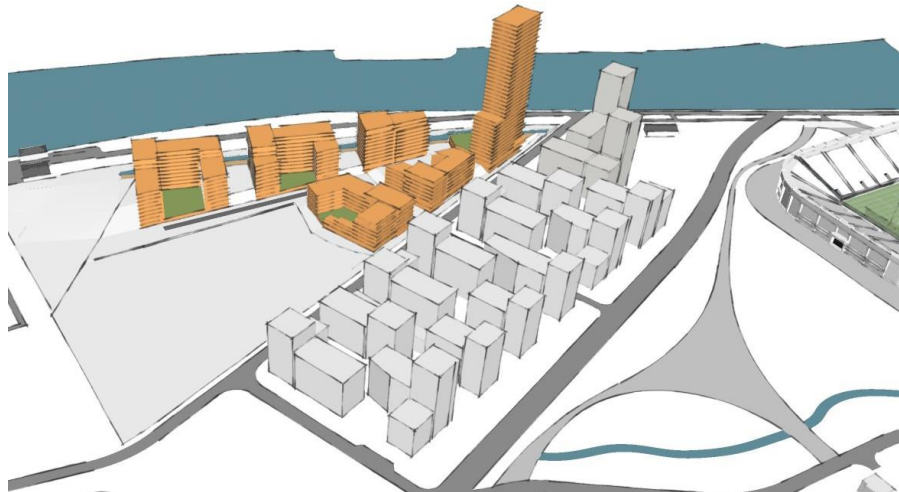


Figure 03.3 Extract from the Design Statement illustrating Permitted and Proposed Heights (C+W O'Brien Architects)

The height of the proposed development has also considered and responded to the existing scale, height and massing of existing and permitted development in the area including Páirc Uí Chaoimh and the Customs House Development (PA ref. 19/38589, ABP-308596-20).



Figure 03.4 Extract from the Tall Building Statement illustrating Permitted and Proposed Heights (C+W O'Brien Architects and Urban Strategies)

From the indicative model below, it is evident that the part-1 to part-7 no. storey along the western boundary of Block C provides for a reasonable transition to the school site in an urban context. The proposed height strategy has duly considered the adjacent school

zoning objective to the west to ensure the development potential of these lands are not negatively impacted.



Figure 03.5 Model of the Proposed Height Strategy (C+W O'Brien Architects)

The Inspector in the assessment of the Former Ford Distribution Site (ABP Ref: ABP-309059-20) was of the opinion that:

*“the nature and pattern of surrounding development is such that the development of the site is not particularly constrained and can largely create its own context and provide a catalyst for further development in the area”* concluding that *“Having regard to the setting and context of the site, the proposed building heights do not impact on surrounding lands or sensitive uses and I do not consider that the proposed heights would impact on the quality of residential amenity...I regard the proposed building heights as acceptable for this location”*.

In addition to the Design Statement which discusses height, a Tall Building Statement has been prepared by Urban Strategies.

### 03.3 Density

The NPF and Apartment Guidelines 2020 seek increased densities at appropriate locations particularly within existing urban areas that are well connected by public transport. The delivery of compact growth through the redevelopment of brownfield sites is a vital component to addressing the critical need to meet the prevailing shortage of housing. As demonstrated in the accompanying Statement of Consistency, the subject lands are defined as a ‘Central and/or Accessible Urban Location’. The Apartment Guidelines 2020 consider such locations appropriate for high density, large-scale developments comprising wholly of apartments.

The proposed development proposes 823 no. apartment units representing a net density of 294 no. units per ha (based on the developable area of 2.8 ha). The proposed development is a direct response to national planning policy which seeks increased densities on

accessible sites in close proximity to key public transport nodes. The proposed redevelopment of the brownfield site will achieve compact growth without compromising the quality of residential amenity for future residents or the future development potential of lands to the west as detailed throughout the application documentation.

The Inspector in granting permission for a net density of 275 no. units per ha on the Former Ford Site (ABP Ref: APB-309059-20) to the east stated that:

*“the provision of higher density development on such brownfield docklands sites is supported at national, regional and local planning policy level and transport infrastructure proposals set out in CMATS are predicated on consolidation of development along public transport corridors”.*

The Inspector also iterated that:

*“I note that there are no identified infrastructural constraints in the area which preclude the achievement of such higher density development on the lands which would otherwise accord with strategic planning policy objectives for the area.”*

As such, the scheme was permitted with a plot ratio of 2.6 (net 2.89). The proposed high density scheme, with a net plot ratio of 3.26, will play an important role in the successful redevelopment of the South Docklands to create a vibrant city quarter as envisaged in national, regional and local planning policies.

### 03.4 Residential Amenity

This section should be read in conjunction with the accompanying Architectural Design Statement prepared by C+W O'Brien Architects and Statement of Consistency prepared by HW Planning which demonstrate that the proposed development has been designed having due regard to the residential amenity afforded to future residents of the scheme.

Resident services and facilities (2,760 sq m) are provided at ground floor level of the proposed development for example co-working spaces, fitness spaces/gym and games areas. In addition to an external communal open space (5,452 sq m) at podium and roof levels which exceeds the requirements for 5,420 sq m of communal space as out in the Apartment Guidelines 2020.

Type	No Units	Space Required	
1 bed	282	5 sq m	1,410
2 bed (3 person)	31	6 sq m	186
2 bed (4 person)	383	7 sq m	2,681
3 bed	127	9 sq m	1,143
Total	823		5,420

In addition, we also highlight some 4,695 sq m of public open space is provided in the proposed scheme as identified in the Architectural Design Statement and detailed in the Landscape Report prepared by Park Hood Landscape Architects. Furthermore an additional 15,000 sq m of landscaped public open space is also provided within the application site. The residential amenity for future occupiers is further enhanced by the proximity to the recently completed Marina Park to the east and Marina Walk to the north.

A Housing Quality Assessment has been prepared by C+W O'Brien Architects demonstrating that all units are compliant with SPPR3 of the Apartment Guidelines 2020 and benefit from private open space in the form of balconies, terraces and winter gardens which meet and in certain cases exceed the minimum requirements set out in the Guidelines. In addition to generous separation distances between facades there are no directly opposing balconies proposed. Private open spaces at podium levels are appropriately screened with hedging as detailed in the Landscape Masterplan.

Notwithstanding the central and accessible location, 46.5 % of proposed units are dual aspect therefore increasing the access to natural daylight and providing a greater quality of residential amenity for future residents. Of particular relevance we note the adjacent site was deemed a 'central and accessible location' by the Board. The Planning Inspector in assessing the permitted Ford Former Ford Factory Site (ABP Ref: APB-309059-20) stated that:

*“I would regard the subject site as a central and accessible urban location where dual aspect provision of 33% would be acceptable in accordance with the apartment design guidelines ”*

Finally in terms of how qualitative standards will be achieved we highlight a Daylight and Sunlight Assessment along with a Wind Microclimate Assessment were carried out by Arup to inform the design of the proposed communal and public open spaces.

### 03.5 Commercial Development

The commercial elements will provide convenience services for future residents and visitors to the South Docklands and ultimately contribute to creating a vibrant urban quarter as envisaged by Cork City Council. The proposed non-residential development contained within the subject scheme include 3. no café/restaurants, 2 no. public houses, 7 no. retail units, a library, medical centre, pharmacy, post office and dentist and 2 no. childcare facilities. The propose commercial uses are concentrated on lands zoned Neighbourhood Centre with ancillary commercial uses provided along key thoroughfares where lands are zoned for Mixed Use development.

The proposed commercial element of the scheme will provide complementary uses to the 823 no. apartment units creating an environment where people want to live. The commercial element will provide active frontage onto the streetscape and contribute to fostering a neighborhood atmosphere in an area that is currently industrial in character. In respect of the recently permitted scheme on the Former Ford Factory Site (ABP Ref: APB-309059-20), the Inspector was of the opinion that:



*“A level of ancillary uses is required to support and serve the predominant residential use proposed on the lands.”*

A summary of the commercial areas proposed as part of this application is provided below.

Breakdown of Proposed Commercial Development by Block		
Block A		
Level	Commercial Use	Area
LG	Retail	124.51
UG /00	Retail	113.87
UG/00	Restaurant	274.37
UG/00	Convenience Store	121.29
UG/00	Bar	193.96
01	Bar	206.18
Block B		
UG/00	Bar	192.75
UG /00	Cafe	73.82
UG /00	Retail	189.96
Block C		
LG UG	Medical Centre (Neighbourhood)	78.96
	Medical Centre (Neighbourhood)	224.40
LG	Library (Neighbourhood)	160.61
UG	Library (Neighbourhood)	64.02
UG	Retail	277.71
UG	Retail	334.30
Block D		
LG	Retail	84.55
UG	Café/restaurant	148.00

UG	Creche	313.95
<b>Block E</b>		
LG	Pharmacy	125.16
LG	Post Office (Neighbourhood)	68.75
LG	Retail	136.13
LG	Retail	186.97
LG	Dentist (Neighbourhood)	32.91
01	Dentist (Neighbourhood)	158.07
<b>Block F</b>		
UG	Creche	348.34
<b>Total Commercial</b>		<b>4,233.73 sq m</b>
UG	Creche Ext. Play Area	132.37
UG	Creche Ext. Play Area	114.60

The commercial element of the scheme is detailed further in the Design Statement prepared by C + W O'Brien Architects.

### 03.6 Transport and Connectivity

As outlined in the accompanying Statement of Consistency, the subject site can be defined as a 'Central and/or Accessible Urban Location' given its strategic location to the east of Cork City Council. The application is supported by a number of traffic documents prepared by Arup in response to Item 8 of the An Bord Pleanála Opinion. This is discussed at Section 4.0 of this report.

The Cork Metropolitan Area Transport Strategy (CMATS) 2040 includes the implementation of proposed transportation infrastructure improvements on Centre Park Road that will further enhance the connectivity of the subject site. This includes an east-west Light Rail Transit corridor from Ballincollig to Mahon (c. 5 minute frequency). The proposed scheme has had regard to the implementation of the future Light Rail Transit upgrades on Centre Park Road and Monahan Road, as agreed with Cork City Council. The range of public transport options provided as part of CMATS will enhance the connectivity of the dock lands with stops proposed along Centre Park Road. The combination of proposed bus and light rail infrastructure investments will have a significant positive impact by providing greater connectivity from the subject lands to education and employment nodes for future residents of the mixed use scheme and support the achievement of a new city quarter.

Cork City Council have recently implemented cycle lanes along Centre Park Road and Marquee Road as shown in the images below. It should also be noted that a Part 8 Road Improvement Scheme for the nearby Monahan Road is due commence early in 2022.



Figure 03.6 Images of Marquee Road (top) and Centre Park Road (bottom) (Google Earth)

The proposed development will provide 278 No. car parking spaces (comprising 10 no. visitor spaces and 268 no. resident spaces which represents a 0.33 car parking ratio per unit. The adjacent scheme (ABP Ref: APB-309059-20) was permitted with a similar parking ratio of 0.39 car parking spaces per unit. The Inspector in their assessment of the scheme was of the opinion that *“Reduced levels of car parking are provided in line with emerging policy for the area, as a measure to encourage modal shift.”*

The proposed development will encourage walking and cycling as the primary mode of travel from the subject site and as such will provide 1,718 no. secure resident cycle spaces and 412 no. visitor cycle spaces as an incentive. The Traffic and Transportation Assessment (TTA) prepared by Arup demonstrates that the subject site is easily accessible by walking and cycling reaching a range of employment, education and leisure nodes. Extracts from the TTA are provided below for reference.

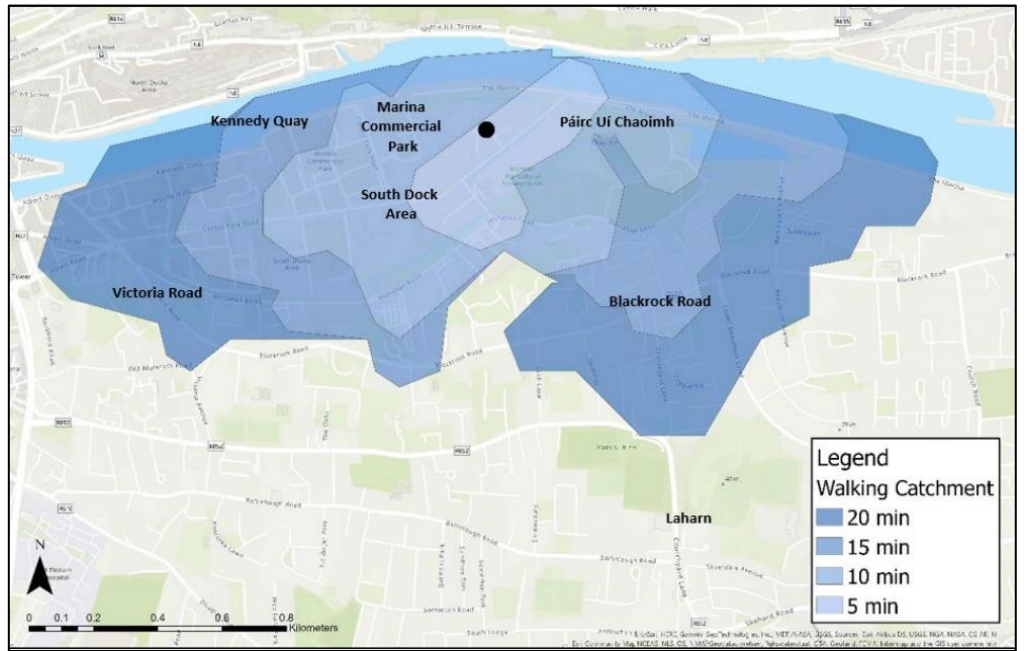


Figure 03.7 Walking Distances from the Subject Site (Arup)

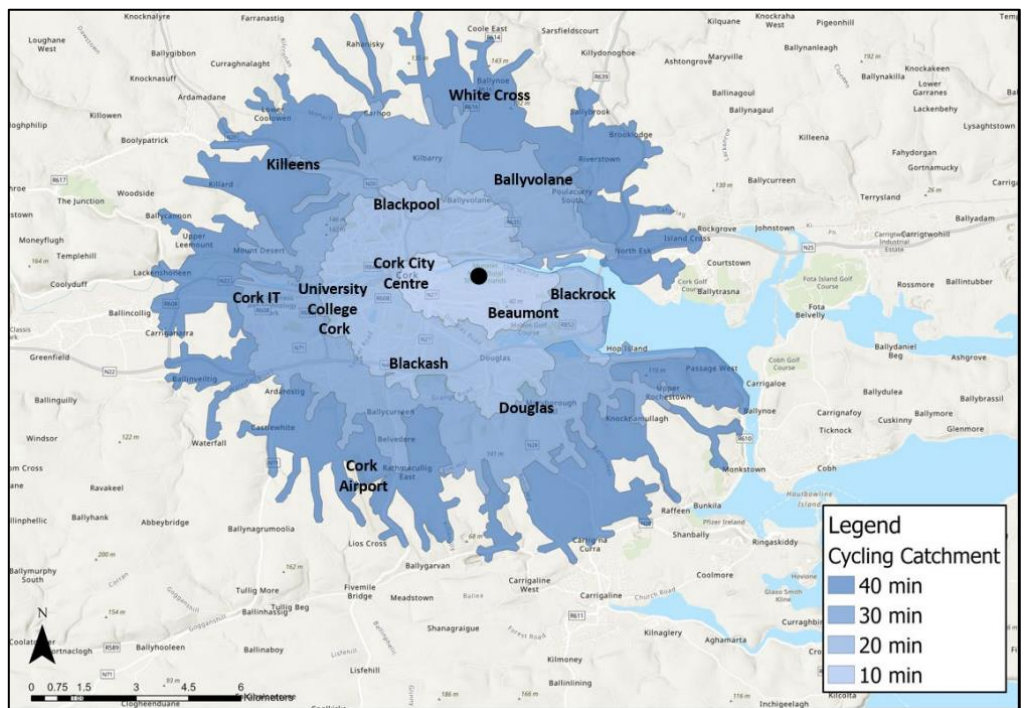


Figure 03.8 Cycling Distances from the Subject Site (Arup)

A Car Parking Management Plan and Mobility Management Plan prepared by Arup are also enclosed with this application.

### 03.7 Part V

In order to satisfy their requirements under Part V of the Planning and Development Act 2000, as amended, the applicants propose to lease 83 units within the proposed development to the Planning Authority for the purposes of social housing. This represents 10% of the overall number of units within the scheme and will comprise a mixture of one,

two and three bed apartments. The full details of the proposal including costing are outlined in the accompanying Part V Cost Methodology prepared by HW Planning and identified in the accompanying Part V architectural drawings.

Part V requirements are also dealt with in the accompanying Material Contravention Statement prepared by HW Planning.

# 04 Response to An Bord Pleanála Opinion

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This section of the report outlines the Applicant and Design Team’s response to the matters raised in the Opinion issued by An Bord Pleanála in December 2020 (ABP-311723-21) and refers to where the topics are further discussed within the application documentation. An Bord Pleanála considered that further consideration of how the development would integrate with or impact adjacent school zoned lands, further consideration and justification for the design, scale, height, and layout of the development, and further consideration of the Neighbourhood Centre zoning objective were required.

## 04.1 Cork City Development Plan Objective ZO 18 – Schools

*“Further consideration of, and possible amendment to the documents and/or design proposals in respect of the relationship of the proposed development with the adjoining lands which are zoned in the Cork City Development Plan Objective ZO18 To provide for new primary and post-primary schools. The application documentation should clearly demonstrate how the development will comply with the lands use zoning objectives of the plan and set out how the development would integrate with, or impact on the future development of a school(s) on those lands.”*

The Design Team have fully considered An Bord Pleanála’s opinion and made relevant revisions to the application documentation where necessary to demonstrate that the proposed development will not negatively impact on the future development potential of a school campus on lands zoned ZO 18 – Schools. Key actions arising from the tripartite discussion included;

- Assessment of existing school provision and likely future demands;
- Consultation with the Department of Education on 9th March 2022; and
- Further analysis of the relationship and size of urban schools in close proximity to the proposed development.

### EXISTING PROVISION FUTURE SCHOOL REQUIREMENTS IN SOUTH DOCKLANDS

HW Planning have carried out a study of the existing number of primary and post primary schools in the surrounding area to inform the future potential need for primary and post primary schools in the South Docklands. The following schools were identified<sup>1</sup>:

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<sup>1</sup> Data sourced from myplan.ie



Primary School	attendance
Naoimh Antaine	825
Ballintemple NS	217
Scoil Barra Naofa (girls)	263
Scoil Barra Naofa (boys)	255
Scoil Naoimh Michael	44
Scoil Ursula	146
Our Lady of Lourdes	243
Naoimh Brid	546

Post Primary School	attendance
Colaiste Daibheid	232
Ashton School	521
Ursuline secondary	193
Christ the King (girls)	1,000
Regina Mundi	531
Colaiste Christ Ri	614

(Schools north of the river have not been considered)



As evident in the above tables, the surrounding suburbs are served by existing school infrastructure. Having regard to the changing demographics in these established residential areas, it is considered that they will have potential spare capacity in the coming years.

Furthermore, there is emerging evidence to suggest that following a few more years of increasing demand, enrollments in schools are set to decrease. The Department of Education has published figures on regional projections for full time enrolments to primary and secondary schools over the period 2018 - 2036. The data shows that enrollments in the south west region (including Cork and Kerry) are expected to fall by just over 29% over the period from 81,000 in 2018 to 57,000 in 2036. The figures also reveal that the decreases in demand will start at primary level in the mid to late 2020's with the post primary demand following suit from around 2030 onward.

At the more localised context and having regard to densities required under national planning policy new developments in the Docklands will consist of a significant proportion of 1 and 2-bed apartment in accordance with the permissible mix ranges in the Apartment Guidelines. These housing mixes have been incorporated into the Apartment Guidelines to reflect recent trends in terms of demand for urban housing. Notwithstanding a mix of house types and tenures required for the area to create a sustainable neighbourhood, it is anticipated housing in this area will tend to attract a greater number of young professionals and couples than the lower suburban zones of the city. In this context, we consider that any assumptions made in terms of school demand in the Urban Expansion Areas in the wider Metropolitan area will not necessarily hold true in the Docklands.

In considering the above predicted decline in demand, we refer to the National Planning Policy Framework, 2020 which promotes an efficient use of resources and acknowledge the *“co-location of uses and infrastructure such as schools and sports facilities...”* as an example of how to increase the efficiency of lands use. The preference to co-locate educational facilities is also reflected in Circulars issued by the Department of Education who recognise that school developments need to have a flexible response to the pattern of development in the surrounding area. Part 3 of the Provision of Schools and the Planning System - A Code of Practice for Planning Authorities, the Department of Education and Science, and the Department of the Environment, Heritage and Local Government, July 2008 provides guidance to Planning Authorities on the location of primary schools and state that the Department of Education and Science will

*“consider the use of multi-campus schooling arrangements in appropriate case, e.g 2 or 3 schools’ side by side; a primary and a post-primary school sharing a site; schools anchoring wider social and community facilities required in the same area”*

## ENGAGEMENT WITH DEPARTMENT OF EDUCATION

The Design Team have engaged with the Department of Education to establish the specific requirements for the delivery of educational facilities in the South Docklands. A meeting took place on 9<sup>th</sup> March 2022, where the Department of Education advised that they had carried out a preliminary assessment of the future schools requirement for the Cork Docklands. This assessment was carried out based on the national demographic profile rather than a bespoke demographic analysis based on the likely demographic

profile of the future Docklands area. This assessment highlights a potential need to deliver 6 no. primary schools and 2 no. post primary schools in the South Docklands, but it was noted that this was the maximum number of schools required. It should be noted that there are 3 no. parcels of Z0 18 – School zoned lands identified in the Cork City Development Plan 2015 -2021, equating to c. 4.75 ha in total.

The Department of Education provided detailed feedback advising that:

- *The City Docks development is the first of its kind in Ireland as it has the aim to be a vibrant, mixed use socially inclusive quarter;*
- *The maximum number of potential schools required could not be provided on the three sites;*
- *The viability of these sites depends on the schools having advance agreement and priority use to avail of the adjacent open public spaces on a structured and dedicated basis during school hours;*
- *When these schools sites are developed for educational use, all the indications are that the intensity of the proposed use will be over-and-above that seen on **other schools sites in Ireland, and will be very urban in nature and need to significantly depart from standard school models of development in order to** deliver the school places required for within the City Docks for the residents; and*
- *The Draft Development Plan and the NPF targets for Cork to 2040 point to the intensification and consolidation of development in Cork City centre areas surrounding the City Docks. This will intensify the pressure for schools needs within the City Docks, City Centre and surrounding school catchment areas.*

The Design Team have responded to the needs of the Department of Education to serve the future resident population by demonstrating that 6 no. primary schools and 2 no. post primary schools can be delivered in the South Docklands. This is based on an examination of recently proposed, permitted and constructed primary and post primary schools in urban locations. An indicative distribution of school campuses across the Z0 18 School zoned lands is provided within the Architectural Design Statement prepared by C+W O'Brien Architects. Of particular note, is the delivery of 2 no. primary schools and 2 no. post-primary on lands adjoining the application site.

The Department of Education informed the Design Team that:

*"...when considering the City Docks, all the schools were envisaged at a minimum height of 5 stories; that the primary schools were all 24 classroom (not 16 classroom) and that the size of post-primary schools has increased by about 25% since Adamstown CC was built due to improvements in the size of specialist teaching spaces. All of these considerations would need to apply when considering an indicative school layout."*

Following receipt of the feedback from the Department of Education, the Design further examined and revised the masterplan to demonstrate a future school campus to the that would meet the needs of the Department of Education. In summary, the key changes include:

- Increase in the number of class rooms from 16 no. to 24 no. in each primary school which will facilitate c. 650 no. students each;

- Increased post-primary schools from c. 1,000 students to c.1,200 students; and
- Identification and allocation of school playing fields and yards.

## RELATIONSHIP AND SIZE OF URBAN SCHOOLS IN CLOSE PROXIMITY TO PROPOSED DEVELOPMENT

The engagement with the Department of Education has allowed for the definition of the maximum future educational needs of the Docklands, which is considered to be 6 no. primary schools and 2 no. post primary schools to be provided on the 3 no. parcels of ZO 18 – School zoned lands designated in the Cork City Development Plan 2015 -2021. The accompanying Architectural Design Statement prepared by C + W O'Brien demonstrates the likely layout of the school campus and its relationship with the proposed development. In addition the delivery of a school campus on adjoining lands is discussed and considered in the Landscape Strategy prepared by Park Hood Landscape Architects and the Daylight and Sunlight Assessment prepared by Arup.

As part of the Section 5 pre-planning consultation, a comparison between Adamstown Community College and the school zoned lands to the west was provided by C + W O'Brien Architects as an example of how educational and residential uses can co-exist in an urban context at an early stage of the design process. Adamstown Community College is a 3 no. storey post-primary school located in an urban area with residential development located c. 17 m to the north. Further to the receipt of the opinion, C+W O'Brien Architects have examined other examples of where residential and educational uses are located in close proximity including St. Clare's Park (TA29S.30855), Grand Canal Harbour (DCC Reg. Ref. 3209/19) and Long Mile Road (TA29S.304686) to further bolster the informed conclusion that the development of the Former Tedcastles site will not prejudice the delivery of a school campus on adjoining lands.

Based on the assessments of the aforementioned urban schools, C+W O'Brien Architects anticipate that 2 no. primary schools (650 no. students each) can be accommodated on lands to the west of the Former Cork Warehouse site, 2 no. primary (650 no. students each) and 2 no. primary schools (650 no. students each) on lands to the west of the South Docklands, in addition to 2 no. primary (650 no. students each) and 2 no. post primary schools (1,200 no. students each) on lands adjoining the application site.

Key considerations of the Design Team to ensure the proposed development would integrate with the future school campus included but were not limited to the impact of the:

- Urban Location;
- Height, Scale and Massing of the proposed development;
- Daylight, Sunlight and Overshadowing;
- Separation Distances and boundary treatments;
- Overlooking; and
- Access.

Local planning policy aims to deliver a new urban quarter in the South Docklands which is supported by national planning policy to delivery increased heights and densities. The Department of Education recognise the planned urban nature of the South Docklands and have advised that schools with heights of up to 5 no. storey are envisaged in this area with

primary schools accommodating c. 650 no. students and post primary schools accommodating c. 1,200 no. students. As demonstrated in the accompanying Design Statement, 2 no. indicative primary schools and 2 no. post primary schools are located on lands adjoining the application site. CGIs of the relationship between the proposed SHD and the future school campus are provided below.



Figure 04.1 Extracts from the C + W O'Brien Architects Design Statement

The school zoned lands are bound to the south by Centre Park Road and to the north by the proposed development (Blocks D and F). In response, the proposed childcare facilities have been positioned in Blocks D and F to provide complementary uses and natural integration.

The height, scale and massing of the development reduces towards the school to ensure an appropriate and balanced approach to the future school site is delivered. Block E is located to the east of the school site. The reduction from part-6 to part-1 along the western façade will ensure that an acceptable transition to the delivery of a 5 no. storey school can be achieved. This is also integral to the Daylight, Sunlight and Overshadowing of the future school. The Daylight and Sunlight Analysis prepared by Arup has considered the future development potential of the lands to the west and conclude that the lands to the west will retain potential for good daylight and sunlight.

We highlight the potential for overlooking between the subject site and the school site has been considered by the Design Team. Whilst it is considered that overlooking would be no greater than that typical from any public or communal open spaces in an urban built up area, the indicative layout for the development of the school site demonstrates that

generous separation distances can be achieved between the future schools and the proposed scheme.

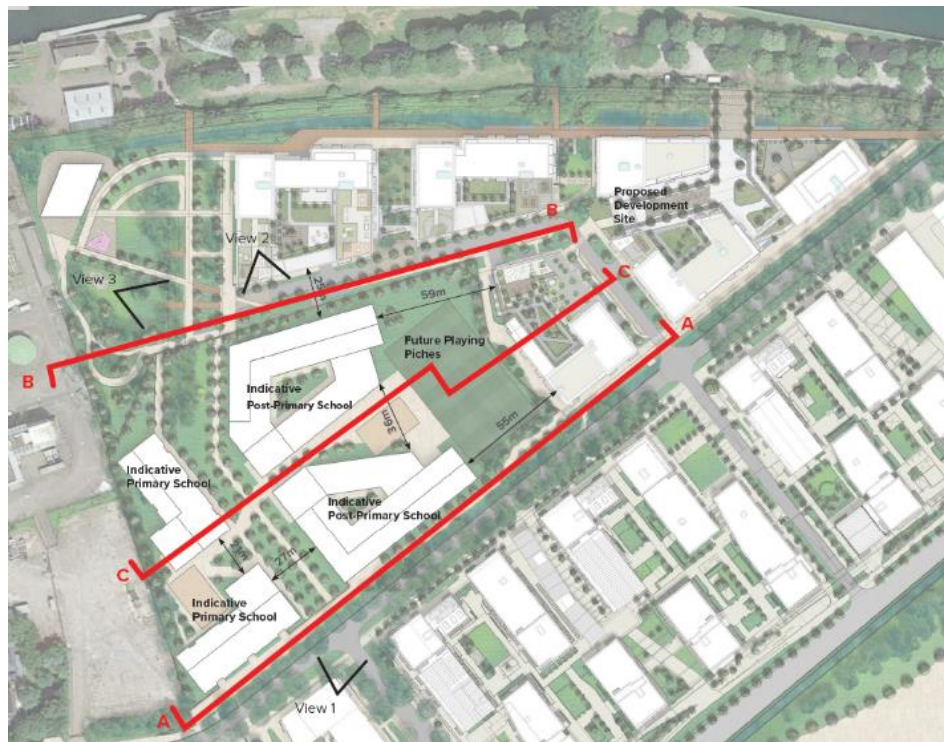


Figure 04.2 Extracts from the C + W O'Brien Architects Design Statement

A Wind Microclimate Assessment was also prepared by Arup in response to the opinion. The assessment was carried out in the following locations:

- Recreational areas;
- Entrances;
- Pedestrian walkways; and
- Balconies.

The Wind Microclimate Analysis demonstrates that the wind comfort for the above areas are acceptable.

In conclusion, we reiterate that the application documentation submitted provides assurance that the proposed Strategic Housing Development will not prejudice the future delivery of a school on lands to the west. It has been demonstrated that the educational needs set out by the Department of Education to cater for the future resident population of school going age can be facilitated within the 3 no. parcels of ZO 18 – School zoned lands in the South Docklands.

The Design Statement prepared by C + W O'Brien Architects explains how the Design Team have duly considered the relationship between the subject lands and adjoining lands to the west. It demonstrates that the proposed development will integrate with the lands to the west and will not prejudiced their future development for schools.

## 04.2 Justification for Design, Scale, Height and Layout

The second item on the An Bord Pleanála Opinion states:

*"Further consideration of the documents and justification for the design, scale, height, and layout of development proposed. The application should*



*describe and demonstrate a strategic design process for these lands which has had regard to the relationship with adjoining lands, and which recognises the role of this site, and the significance of the proposed development, in the wider city. Regard should be had in particular to the criteria set out in Section 3.2 of the Urban Development and Building Height, Guidelines for Planning Authorities' 2018, particularly at the scale of the city and the district, the provisions of the City Development Plan in relation to building height, and as well as the submission of the planning authority to An Bord Pleanála, dated 16/11/2021."*

The Design Team have further considered and developed the detailed design of the proposed scheme to address the feedback from Cork City Council and An Bord Pleanála. As such, the scale and height of the proposed development has been significantly reduced following the Section 5 Tripartite meeting having regard to the aspirations of Cork City Council for this area of the South Docklands. The discussions with the Department of Education and Cork City Council have also influenced the strategic design process, with particular attention on the future delivery of a school campus on adjoining lands.

The design evolution is comprehensively detailed within the following accompanying documents:

- Architectural Design Statement prepared by C + W O'Brien Architects;
- Tall Building Statement prepared by Urban Strategies; and
- Environmental Impact Assessment Report – Alternatives Chapter prepared by Arup.

Section 3.0 of the Building Heights: Guidelines for Planning Authorities 2018 promotes increased heights in urban areas where certain criteria can be demonstrated. The guidelines require that at the scale of the relevant city/town, the site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. Additionally, development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

The subject site is served by an hourly bus service on Centre Park Road (less than 300m from the subject site) from Horgan's Quay to Mahon Point shopping center (Route no. 212). In addition to more frequent bus services available along Blackrock Road (Route no. 202 and 202A Hollyhill (Apple) to Mahon which operates a c. 20 no. minute frequency. The Blackrock bus stop is located c. 800 m to the south-west, a 10 no. minute walk.

The high capacity 'Light Rail Transit' public transport corridor from Mahon to Ballincollig via Centre Park Road will further enhance the frequency of public transport from the docklands (c. 5 no. minute frequency).

The Inspector in the assessment of the scheme at the adjacent Former Ford Site (APB-309059-20) was of the opinion that it was:

*“located in an area which is less sensitive in terms of its visual amenity context. The proposed development will improve the urban character of this area and integrate and address public realm improvements occurring at Marina Park.”*

A Landscape and Visual Impact Assessment has been prepared by Park Hood Landscape Architects and is enclosed as part of the EIAR compiled by Arup. The assessment concludes:

*“...there is little in terms of landscape features or vegetation of note or worthy of retention with the lands being subject of historical disruption and change. The most notable feature on the site is the open channel or waterway to the north towards Marina Park that is to be retained with the tidal gate repaired and become the core of an ecological parkland that coordinates and links the existing park to the proposed development.”*

Furthermore, noting that,

*“The proposed development, while substantial, would result in a positive contribution to the townscape character and urban fabric of this part of the South Docks. While recognising there are some significant local impacts, this report concludes that this proposal, on balance, has no unacceptable townscape / landscape or visual effects and can be successfully absorbed into the character and views of this part of the city.”*

The part-1 to part-35 no. storey development will provide an appropriate higher density development on a strategically located brownfield site that will integrate with adjoining sites.

In addition to the above, at the scale of district/ neighbourhood/ street the Height Guidelines direct that development should *“respond to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.”* Development proposals should *“not be monolithic and should avoid long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered. Proposals should enhance the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).”*

The proposed development will make a positive contribution to the improvement of legibility through the site and wider urban area which is currently not accessible to the public and is enclosed by industrial type railings. The proposed Strategic Housing Development will positively contribute to the mix of uses and buildings in the South Docklands.

At scale of district/ neighbourhood/ street development should *“appropriately respond to its receiving environment by providing a vertical and lateral mix of uses that will address the surrounding streetscape.”* The proposed mix of units has been designed having regard to the Apartment Guidelines and will provide a range of unit sizes (as detailed on the accompanying HQA) to meet the housing needs for a range of people.



The quality materials and finishes proposed are detailed in the accompanying Design Statement and Landscape Strategy. The CGIs demonstrate that the redevelopment of this brownfield site will significantly improve the quality of the environment experience at street level by future residents and visitors.

The proposed scale, height and massing of the proposed development will act as a key wayfinding measure in the locale particularly when moving along Centre Park Road. The proposed development provides a natural extension of the redevelopment of the South Docklands (i.e., Former Ford Site and Marina Park) and will provide a complementary mix of smaller typologies to the existing stock of family sized dwelling houses in the surrounding suburbs.

A Flood Risk Assessment prepared by Arup is enclosed concluding that the sensitive elements of the development are appropriately situated.

On a more micro level, the guidelines state that at the scale of the site/building *“The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.”*

The Design Team have developed the current proposed scheme having regard to natural daylight, ventilation and views and to minimise overshadowing and loss of light. We note that 46.5 % of units are dual aspect providing greater daylight, views, and ventilation than that required in the Apartment Guidelines 2020. A detailed Daylight and Sunlight Assessment prepared by Arup is also submitted.

In addition to the above scales, the guidelines list the following specific assessments to be considered:

- *To support proposals at some or all of these scales, specific assessments may be required and these may include:*
- *Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*
- *In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.*
- *An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.*
- *An assessment that the proposal maintains safe air navigation.*
- *An urban design statement including, as appropriate, impact on the historic built environment.*
- *Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.*

An Appropriate Assessment Screening and Natura Impact Assessment have been prepared by Dixon Brosnan and are enclosed with the application. In addition to an Environmental Impact Assessment Report, Daylight and Sunlight Assessment and Wind

Microclimate Assessment have also been prepared by Arup. An Aeronautical Assessment Report prepared by O'Dwyer & Jones Design Partnership is enclosed as part of the application documentation and confirms that the proposed development complies with all aviation and aeronautical requirements affecting the site.

A Landscape and Visual Impact Assessment has also been prepared by Park Hood Landscape Architects and is enclosed as part of the EIAR. Having regard to the recently permitted 4 to 14 no. storey scheme to the south, the LVIA notes:

*"...there are cumulative effects with the consented Ford Site but these are rated as positive and in line with the objectives for the South Docks as set out in the CCDP."*

It is considered that no other specific assessments are warranted. We consider that the proposed part-1 to part-35 no. storey development on this strategically important and accessible site in the South Docklands has been suitably designed in response to its receiving context. The development of the Former Tedcastles site will play an integral role in the successful delivery of a new urban quarter in the South Dockland as envisaged in local planning policy. We refer to the Tall Building Statement prepared by Urban Strategies which outlines that:

*"The subject site serves as one of the most important areas within the South Docks, due to its relationship to the river's edge and its high visibility at the most eastern point. Exceptional height and increased density is desirable in this area through well-intentioned design and clustering. The location of the South Docks, its future transit connectivity and its proximity to the city centre allows this to be a location well-suited for high-rise buildings that do not compete with Cork's City Centre."*

Furthermore, concluding that:

*"The proposed development has the potential to become an iconic landmark for Cork that will be known beyond the context of the local municipality. Serving as a unique waterfront destination, the exceptional height of the Block A tower will serve as the symbol marking the site, seen from across the city by punctuating the skyline with an exceptional design."*

### 04.3 Neighbourhood Centre Zoning

The third item on the An Bord Pleanála Opinion states:

*"Further consideration of, and possible amendment to the documents and/or design proposals, having regard to the Neighbourhood Centre zoning objective for lands fronting Centre Park Road.*

*Consideration should provide a detailed / robust planning rationale for the location and layout of commercial uses on the site and should demonstrate how the development will support the land use objectives of the development plan for this area. Regard should be had to the relationship with adjacent development on Centre Park Road permitted under ref. ABP-309059-20 and how these developments will contribute to the objectives of the development plan in this regard.*

*The application should provide a rationale for the omission of lands zoned for neighbourhood centre uses, which are within the prospective applicant's ownership."*

The lands zoned ZO 9 - Neighbourhood Centres located within the Former Tedcastles Site which were originally omitted from the Section 5 consultation documentation are now included within the application boundary where the stated objective is to:

*"to protect, provide for and/or improve the retail function of neighbourhood centres and provide a focus for local service."*

Furthermore, the Cork City Development Plan 2015 – 2021 states that:

*"The primary purpose of these centres is to fulfil a local shopping function, providing a mix of convenience shopping, lower order comparison shopping, and local services to residential and employment areas. Some of these centres need to be enhanced significantly in terms of their retail offering, mix of uses, public realm, and overall viability and vitality."*

The southern side of Blocks C and E are located on ZO 9 - Neighbourhood Centre zoned lands and will comprise a mix of commercial uses at lower ground and ground floor level. The breakdown in proposed commercial development is provided at Section 03.5 of this report and are consistent with Section 4.19 of the Development Plan which outlines that:

*"Neighbourhood centres provide important top-up and day-to-day shopping and retail service requirements and play an important role in serving the needs of those without access to a car, particularly the elderly. They are typically characterised by small scale convenience offer and ancillary retail services (typical uses include a newsagent, supermarket, grocery store, sub-post office) and serve a small, localised catchment population. They normally serve a pedestrian catchment of approximately 800m. New centres will generally be anchored by a small/medium sized convenience store and should also include a number of smaller associated local service units to enhance the overall appeal of the centre in terms of service provision and design."*

Furthermore, Section 4.20 of the Development Plan states that:

*"New Neighbourhood Centres should be mixed-use schemes, incorporating a range of local services, a vertical mix of uses where possible, and a high quality of urban design appropriate to their scale and character. In addition to retail, neighbourhood centres may include residential and complementary local services, such as childcare, retail offices, pharmacies, medical consultancies, public houses, small shops, etc."*

The proposed scheme provides complementary uses at the lower levels of all proposed building to encourage activity within the site and provide passive surveillance. The proposed neighbourhood centre uses principally front Centre Park Road whilst also addressing the main accesses to the site.

The Design Team have considered the commercial offering permitted at the Former Ford Factory Site, particularly those fronting Centre Park Road. It is considered that the proposed development will provide a natural extension of the permitted uses (ABP Ref: APB-309059-20 refers) on lands zoned Neighbourhood Centre which include community

resource spaces and retail units. The Inspector in recommending the Board to grant permission for development of the Former Ford Factory Site attached a condition stating:

*“The permitted use of the multi-purpose room within the Community Resource facility in Block 9, at the corner of Centre Park Road and the Local Centre Square, shall include uses permissible under ZO 9 Neighbourhood Centres land use zoning objective, as defined in the Cork City Development Plan 2015-2021. Revised details to facilitate such use shall be submitted to and agreed in writing with the planning authority prior to first occupation of the unit. Reason: In order to facilitate appropriate levels of street level activity at this important nodal location.”*

The Board accepted the Inspectors condition and granted permission attaching the condition. It is considered that the development subject to this application appropriately addresses the Neighbourhood Centre zoning by providing uses that will encourage footfall along Centre Park Road.



Figure 04.3 Extract from C +W O' Brien's Architectural Design Statement

#### 04.4 Other Information to be Submitted

In addition to the above, An Bord Pleanála requested that the following items be addressed.

- 01 The application drawings should provide further detail with regard to existing and proposed levels across the entire development site. The treatment of level differences within the proposed development and the relationship of the development with adjoining lands and public roads should be described in detail, in plan and in section drawings. Particular consideration should be given to the interface with Centre Park Road and the Marina. The application should describe the relationship between proposed commercial units and adjoining public spaces and how pedestrian footfall and activity will be generated within these areas.

Existing levels of the site are provided on the Existing Site Layout (Drawing No. PE21055-CWO-ZZ-00-DR-A-0104) prepared by C + W O'Brien Architects. The proposed site levels and finished floor levels of the proposed development are provided on all site plans, floor plans and sections also prepared by C + W O'Brien Architects. The architectural drawing pack demonstrates how the proposed development has been designed to integrate with

both the existing and future surrounding environments, including the inferred ABTA Centre Park Road infrastructure upgrades. Supplementary site sections at a scale of 1:100 have been prepared to provide further clarity on the treatment of level changes throughout the site.

A contextual elevation of Centre Park Road is provided as part of the application (Proposed Contextual Site D-D - PE21055-CWO-ZZ-ZZ-DR-A-2508) to illustrate the response to level changes. Active uses are proposed at lower ground and ground floor levels fronting Centre Park Road to allow direct access from the public realm. In addition to the response at Section 04.3 of this report, we refer to the Architectural Design Statement submitted with this application which comprehensively details the character areas within the site.

Park Hood Landscape Architects have prepared a number of landscape cross sections demonstrating that the movement through the site has been duly considered in the design. Both steps and ramped access are provided throughout to facilitate access for all ages and abilities.



Figure 04.4 CGI of the proposed landscaping (C+W O'Brien Architects)

A Universal Access Statement has also been prepared by C + W O'Brien Architects and is enclosed as part of this application.

Similarly, architectural and landscaping sections have been prepared for the north of the site to demonstrate that the treatment of the boundary between the Former Tedcastles site and the Marina have been designed to ensure a seamless integration with existing infrastructure in the vicinity.

- 02 Further analysis of the relationship with Centre Park Road should be undertaken and described in detail in the application, to include detailed section drawings and other imagery demonstrating the context of the site with adjoining permitted development.

We reiterate that sectional drawings have been prepared at both 1:500 and 1:100 to provide An Bord Pleanála and interested parties with sufficient detail to understand the integration with Centre Park Road.



Visually Verified View Montages (VVM's) have been prepared by Urban 3D, in addition to Computer Generated Images (CGI's) to aid in the understanding of the proposal.

- 03 The application should include a detailed rationale for the proposed residential density and housing mix having regard to the provisions of the City Development Plan and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018). The application should respond to the issues raised in the submission of Cork City Council received by An Bord Pleanála on 17/11/2021.

The proposed development comprises 823 no. residential units containing 282 no. one bed units, 414 no. two bed units and 127 no. three bed units. Density is discussed at Section 03.3 of this report and provides a rationale for the proposed net 294 no. unit per hectare scheme having regard to national, regional and local planning policy. The NPF and Apartment Guidelines 2020 seek increased densities at appropriate locations particularly within existing urban areas that are well connected by public transport. The delivery of compact growth through the redevelopment of brownfield sites is a vital component to addressing the critical need to meet the prevailing shortage of housing. As demonstrated in the accompanying Statement of Consistency, the subject lands are defined as a 'Central and/or Accessible Urban Location' where such locations are considered appropriate for high density, large-scale developments comprising wholly of apartments. It should be noted that An Bord Pleanála have previously granted permission for a SHD with a density of 275 no. unit per hectare scheme on lands to the east. Notwithstanding that the density of the proposed scheme is influenced by the quantum of smaller units proposed, it should also be acknowledged that the proposed 35 no. storey 'Block A' skews the overall net density of the development.

The proposed scheme has been designed to accord with Specific Planning Policy Requirement (SPPR) 1 of the Apartment Guidelines, 2020 which states that

*“Housing developments may include up to 50% one-bedroom or studio type units...and there shall be no minimum requirement for apartments with three or more bedrooms...”.*

There are no studio type units proposed as part of the application. The proposed mix includes the delivery of 282 no. one bed units which represents 34 % of the development.

Furthermore, SPPR 3 states that:

*“no more than 10% of the total number of units in any private residential development may comprise this category two-bedroom three-person apartments.”*

The proposed scheme provides 31 no. two bed three person units (4 %) therefore the development is consistent with SPPR 3.

The proposed development provides a choice of smaller unit sizes in response to the *Sustainable Residential Development in Urban Areas (Cities, Towns & Villages), 2009* Guidelines which acknowledge changing household formations and declining family sizes. The proposed housing mix will respond to the acute shortage of high quality residential units in sustainable urban locations. The Daft.ie House Price Report entitled 'An analysis of

recent trends in the Irish residential sales market 2021 Q3<sup>2</sup> published September 2021 projects that:

*“with Ireland registering population growth and net migration even during the worst of the Covid-19 pandemic, and with strong evidence of suppressed household formation, demand for housing is set to remain strong well past the short- and medium-term and into the middle of the century.”<sup>2</sup>*

The proposed housing mix will provide a complementary choice of residential units to the existing stock of large, low density family type dwelling homes in the surrounding area of Cork City suburbs. The proposed 823 no. units will provide suitably size tenure for a range of household formations ranging from young professionals to ‘downsizers’.

It should also be noted that the Cork City Development Plan 2015 does not provide an evidence based HNDA for the South Docklands to dictate the mix of units needed to accommodate future population growth in this area. According to the 2016 CSO, the predominate tenure in the South Docks (Electoral Division Knockree B) is House/Bungalow which represents 88%. The redevelopment of the South Docklands is envisaged to provide a ‘major new mixed use quarter.’ The proposed development aims to provide a choice of suitably sized tenure in this area that responds to changing demographics including family formations and household sizes in line with one of the NPF’s core principles to “tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located”. The provision of a greater number of smaller units will complement the existing stock of traditional low density family dwelling houses in the South Docks by providing an efficient mix of units that meet the needs of modern households. 51.3% of households contain 3 + no. resident persons according to the 2016 CSO. In comparison the 34 no. flat/apartment units recorded in the 2016 CSO had an average of 1.6 no. residents.

The Design Team have fully considered the issues raised in the submission of Cork City Council received by An Bord Pleanála on 17/11/2021 and have amended the scheme and application documentation in certain aspects. The Design Team maintain that the proposed unit mix is appropriate in this location and enclose a Material Contravention Statement to address Development Plan Policy Objective 6.8 and Table 16.4 as referenced by the Planning Authority. An Bord Pleanála (ABP Ref: APB-309059-20) have previously accepted that the above referenced policy objectives are not aligned with current household formation patterns. The Inspector in assessing the Former Ford Site to the south was of the view that:

*“I find Table 16.4 of the development plan to be unclear with regard to the targets identified for bedspaces (dwelling type) vis bedroom number (house size), i.e., a 2-bed house would not generally be regarded as a 2-person dwelling type.”*

The Inspector adds that:

*“The proposed development complies with SPPR1 of the Apartment Design Guidelines in terms of housing mix and can therefore be considered to provide a reasonable and sustainable mix of housing which reflects current trends in household formation patterns.”*

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<sup>2</sup> Available at: [https://ww1.daft.ie/report/2021-Q3-houseprice-daftreport.pdf?d\\_rd=1](https://ww1.daft.ie/report/2021-Q3-houseprice-daftreport.pdf?d_rd=1)



The rationale for the proposed housing mix is comprehensively addressed in the Material Contravention Statement prepared by HW Planning.

The Planning Authority provided the following feedback on density in their submission received by An Bord Pleanála on 17/11/2021.

*“In considering the appropriate density for the site there will necessarily be some flexibility applied at the SHD application stage taking into account:*

- *The Former Ford Distribution Depot SHD scheme, which has a very similar land use mix and also a very high-profile development site with similar site locational attributes, was permitted with a plot ratio of 2.7:1 and density of 275dph;*
- *The principle of accepting a landmark / taller buildings at the Eastern Apex of the site infers that the density of the scheme will most likely exceed the stated general target density;*
- *The balance of the site has been zoned for a school, which will reduce residential yield across the total site area. The density target in the Draft CCDP of 2.5:1 (see p337) is the highest in the City Docks to reflect the need to offset, to some degree at least, the need to accommodate the Schools site within the Character Area / Ted Castle site.*

*However, in general terms it is very important that the statutorily adopted density target is broadly maintained for the City Docks to provide appropriate development parameters, to provide for infrastructure planning and also to provide a strategic placemaking vision that is clearly understood.*

*As per the comments of the Planning Policy Section above, the Planning Authority considers that a proposed density of 394 dph site is unacceptable.”*

We refer to Section 16.40 - Residential Density of the Development Plan which provides minimum standards for density, stating that:

*“Densities of greater than 50 dwellings per hectare will normally require a mix of houses and apartments. Densities higher than this baseline level will 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;*

*Major development areas and mixed use areas (including the central areas, District, Neighbourhood and Local centres).” [Emphasis Added].*

The proposed net density of 294 no. units per ha is greater than the minimum standard set out above. Furthermore, the Inspector in granting permission for a net density of 275 no. units per ha on the Former Ford Site (ABP Ref: APB-309059-20) to the east stated that:

*“the provision of higher density development on such brownfield docklands sites is supported at national, regional and local planning policy level and*

*transport infrastructure proposals set out in CMATS are predicated on consolidation of development along public transport corridors”.*

The Inspector also iterated that:

*“I note that there are no identified infrastructural constraints in the area which preclude the achievement of such higher density development on the lands which would otherwise accord with strategic planning policy objectives for the area.”*

The proposed density is therefore considered to be consistent with Development Plan. Albeit plot ratio as prescribed within the Development Plan is intended as an 'indicative' guide rather than a maximum ceiling for plot ratio in the Docklands it has been included within the Material Contravention Statement prepared by HW Planning. An Bord Pleanála have recently granted permission for the Former Ford Factory (ABP Ref: ABP-309059-20) with a plot ratio of 2.89 which sets precedent for the future pattern of development in the South Docklands.

- 04 Detailed design proposals for proposed pedestrian bridges from the application site to the Marina, crossing the open storage channel, should be provided. Any associated works occurring outside of the applicant's landholding should be clearly identified and evidence of the consent of the relevant landowner should be submitted in this regard.

The proposed scheme includes the delivery of 4 no. pedestrian bridges from the Tedcastles site across the existing watercourse to the Marina to the north. Park Hood Landscape Architects have engaged with Liam Casey, Cork City Council Parks Department in respect of the proposed landscape strategy including the connections to the north, which have been agreed in principle. A letter of consent from Cork City Council has been received for inclusion of their lands to the north (the Marina) and south (Centre Park Road) to facilitate the seamless integration of landscaping and engineering works with existing infrastructure.

Please refer to the Landscape Strategy prepared by Park Hood Landscape Architects which comprehensively details the proposed landscaping treatments.



Figure 04.5 Extract from Landscape Strategy (Park Hood Landscape Architects)

A number of sections have also been prepared to demonstrate how the proposed pedestrian bridges will connect to the existing pedestrian infrastructure. The proposed bridges will significantly improve the permeability of this area of the South Docklands while retaining and enhancing the ecological value of the existing watercourse.

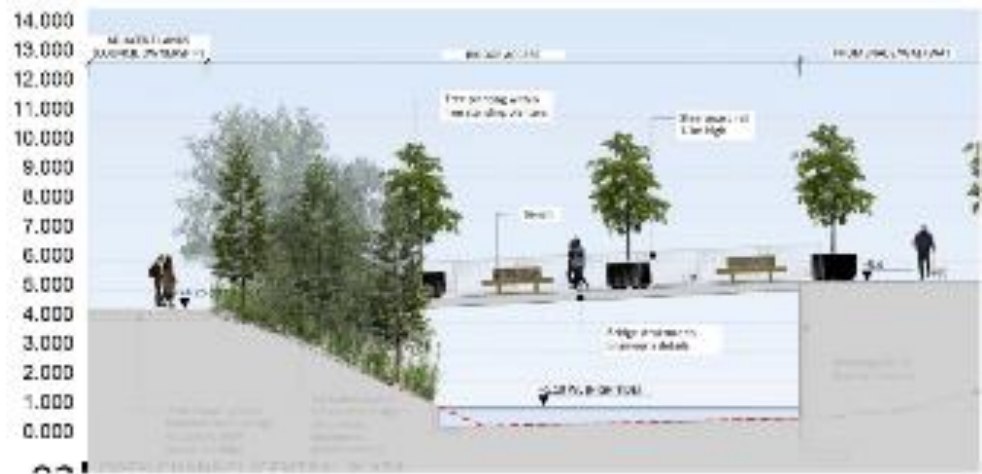


Figure 04.6 Extract from Landscape Section (Park Hood Landscape Architects)

Furthermore, the Landscape Strategy provides a series of precedent images that have informed the design of the pedestrian bridges. Urban 3D have also prepared a CGI of the area to the north as a visual aid.



Figure 04.7 CGI prepared by Urban 3D

- 05 An analysis of the impact on views identified in the Landscape and Visual Summary Statement should be provided and further consideration should be given, inter alia, to the scale and mass of development in longer views east from the city. The analysis of visual impacts should also give consideration to the extent of masterplan proposals for the lands.

A Landscape and Visual Impact Assessment has been prepared by Park Hood Landscape Architects and is enclosed as Chapter 12 of the Environmental Impact Assessment Report. The LVIA outlines that:

“To support the visual assessment, photomontages, wirelines and graphics have been prepared from 20 no. representative viewpoints by Urban3D to allow assessment of its potential scale and nature in these views and these are contained in Appendix A. The viewpoint selection process and photomontage methodology is based on Landscape Institute Technical Guidance Note 06/19: ‘Visual Representation of Development Proposals (2019).’”

It should also be noted that Park Hood Landscape Architects consulted with Cork City Council with regards to the LVIA process and general landscape design arrangements. An extract from the LVIA identifying the viewpoint locations is provided below for reference, in addition to a table of visual reference points.

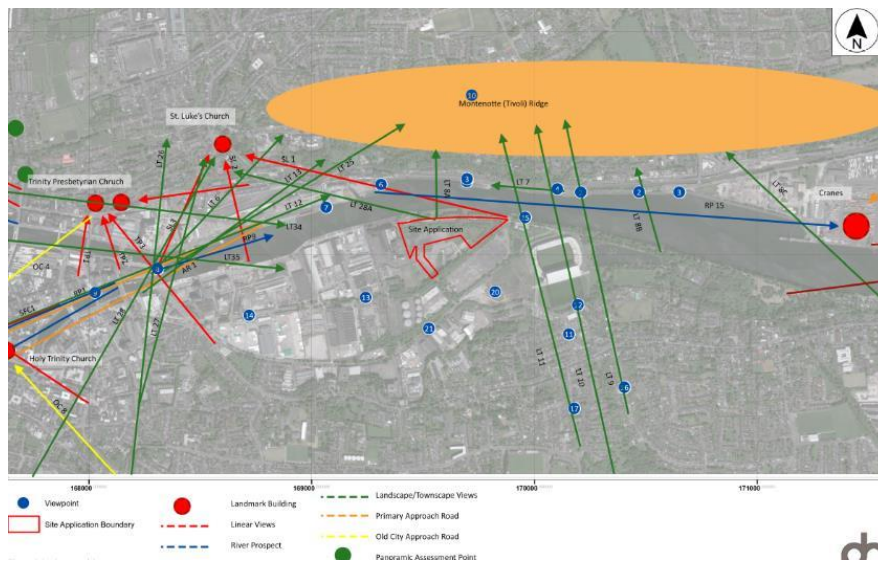


Figure 04.8 Extract from EIA LVIA Chapter (Park Hood Landscape Architects)

VRP No.	Location	Relevant Designation or Reference as per CCDP and SDLAP
Viewpoint 1	Lower Glanmire Road	
Viewpoint 2	Port of Cork Garden off Lower Glanmire Road	Near View LT 7A
Viewpoint 3	Entrance/exit road to the Tivoli Industrial Estate	
Viewpoint 4	Woodside, Tivoli – pedestrian railway crossing	View LT 7A
Viewpoint 5	Bellevue Villas, off Lower Glanmire Road	
Viewpoint 6	Ferryboat House, Lower Glanmire Road	
Viewpoint 7	Horgan’s Quay	
Viewpoint 8	Custom House Quay	View RP 9, Map 13
Viewpoint 9	Clontarf Bridge, Cork City Centre	
Viewpoint 10	Middle Glanmire Road, Montenegro	



Viewpoint 11	Maryville, Ballintemple	
Viewpoint 12	Monahan Road, Ballintemple	
Viewpoint 13	Centre Park Road	
Viewpoint 14	Centre Park Road	
Viewpoint 15	The Marina Boat Jetty Pontoon	
Viewpoint 16	Beaumont Drive	View LT 9, LT 10 Map 16
Viewpoint 17	Church Yard Lane, Ballintemple	View LT 11, Map 16
Viewpoint 18	Ballinlough Park	
Viewpoint 19	Lotaville, N8 Road Tivoli	View AR 5, Map 16
Viewpoint 20	Marina Park off Monahan Road	

Figure 04.9 Extract from EIAR LVIA Chapter (Park Hood Landscape Architects)

- 06 An Invasive species management plan should accompany the application where such species are identified within the lands.

An Invasive Species Management Plan (ISMP) has been prepared by O'Donovan Agri Group and is enclosed as a standalone document. The ISMP has been considered in the Construction Environmental Management Plan prepared by Arup.

- 07 The site plans should clearly identify all / any wayleaves or rights of way across the application site in accordance with the requirements of article 127(2) of the Planning and Development (Strategic Housing Development) regulations 2017, as amended.

In addition, existing overhead powerlines traversing the site, and associated adjacent pylon structures, should be clearly identified in the application drawings.

It should be noted that there is a typographical error in above item, it is our understanding that 'article 127(2) of the Planning and Development (Strategic Housing Development) Regulations 2017' should be referring to 'S.I. No. 271 of 2017 - Planning and Development (Strategic Housing Development) Regulations 2017'.

Notwithstanding the above, wayleaves of relevance to the application site are illustrated on the Site Location Map (Drawing No. PE21055-CWO-ZZ-00-DR-A-0103) prepared by C + W O'Brien Architects in accordance with Section 298 of the Planning and Development Regulations, 2021 (as amended) which was inserted by article 5 of S.I. No. 271/2017 – Planning and Development (Strategic Housing Development) Regulations 2017.

Existing powerlines traversing the site, pylon structures and other buildings of note are illustrated on the existing site plan (Drawing No. PE21055-CWO-ZZ-00-DR-A-0104) and proposed site plan (PE21055-CWO-ZZ-00-DR-A-0106). There are no amendments proposed to the overhead powerlines. The overhead powerlines are also indicated on the accompanying Landscape Masterplan (Drawing No. 7248-L-2000) for completeness.

Extracts from the existing and proposed site layout plans are provided below for reference.



Figure 04.10 Extract from the Existing Site Plan (C + W O'Brien Architects)



Figure 04.11 Extract from the Proposed Site Plan (C + W O'Brien Architects)

- 08 A revised strategy should be submitted for the collection, management, storage, and discharge of surface waters, including SUDS measures, which shall take account of the provisions of the Cork South Docks Levels Strategy. The strategy should include detailed proposals for the treatment, including any upgrading, realignment or remediation, of existing open drains and culverts within and adjoining the site. The application should address the matters raised in the report of the Drainage Department of Cork City Council dated 19/10/2021.

The Design Team have considered the above item and have updated the application documentation where necessary. A Site Infrastructure Report has been prepared by Arup to address the contents of the above item. The report states that:

*“The Cork South Docklands Levels Study describes proposed upgrades/amendments to the existing infrastructure in the vicinity of the site and the design of this site is cognizant of those proposals.”*

The report outlines how proposed SUDs features will be incorporated into the scheme to provide amenity, biodiversity and water quality benefits as well as contributing to reducing the extent of grey infrastructure requirements. A proposed surface water drainage layout (Drawing No. 267365-ARUP-ZZ-ZZ-DR-C-2100) is enclosed.

Arup have engaged with Cork City Council’s Drainage Department on the contents of their report and have agreed the proposed drainage strategy in principle. It was agreed that there is no requirement to provide Public Stormwater Storage on the site.

- 09 An analysis of wind microclimate and pedestrian comfort should be submitted, with reference to pedestrian occupation and usability of new public spaces in the context of the proposed development and adjoining permitted developments. The analysis should also address the safety and comfort of residential amenity spaces, including communal spaces and private upper floor balconies, both within the site and on adjoining lands. Any required mitigation or other design measures arising from such assessment should be clearly described and assessed in the study. The assessment should have regard to the interaction with adjoining future development within the Masterplan area.

Arup have prepared a Wind Microclimate Assessment in response to the above item. The objectives of the wind assessment are to:

- Evaluate the local microclimate that is experienced on site and examine the level of pedestrian comfort within the proposed development;
- Propose mitigation measures to alleviate the corresponding issues relating to pedestrian comfort and distress.
- Assessment of the effectiveness of the mitigation measures of the mitigation measures, which are adopted in the design at alleviating pedestrian discomfort and distress.

The proposed development is expected to provide a suitable environment for pedestrians and occupants to carry out a wide variety of ‘sitting’, ‘standing’ and business walking’ activities. Wind mitigation have been adopted into the scheme in the form of landscaping and solid parapets for the balconies.

The Wind Microclimate Assessment report and Architectural Design Statement provide further information on the above and are enclosed as part of this application.

- 10 The application should include a comprehensive daylight and sunlight assessment examining the proposed dwelling units and amenity / open spaces, as well as potential impacts on daylight and sunlight to adjoining properties, including permitted development to the east and the adjoining zoned school site. This assessment should consider the relationship between the proposed development and future development on the wider Masterplan lands.



In preparing such assessment regard should be had to the provisions of section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities (2018) and to the approach outlined in guides like the BRE 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

The assessment should provide a comprehensive view of the performance of the entire development in respect of daylight provision. Where any alternative, compensatory design solutions in respect of daylight are proposed, these should be clearly identified and justified, and their effect appropriately described and / or quantified.

A Daylight and Sunlight Analysis has been prepared by Arup and is enclosed with this application. The Daylight and Sunlight Report has been prepared having regard to the relevant policy guidance documents. The assessment also investigates the performance of the proposed development including public and communal open spaces.

Section 12.0 of the C+W O'Brien Architect's Design Statement provides further discussion on how this urban development has considered daylight and sunlight as part of the overall design of the scheme.

- 11 A housing quality assessment should be submitted which provides the specific information regarding the proposed apartments required by the Guidelines on Design Standards for New Apartments (2020). The assessment should demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.

A Housing Quality Assessment has been prepared by C + W O'Brien Architects demonstrating compliance with the standards in the Apartment Guidelines, 2020. The Statement of Consistency prepared by HW Planning also addresses the Specific Planning Policy Requirements contained within the Apartment Guidelines, 2020.

- 12 The application should be accompanied by the following:
  - a) A Traffic and Transport Impact Assessment (TTIA), the scope of which should be discussed in advance with Cork City Council, and a Mobility Management Plan.
  - b) A report demonstrating compliance with the principles and specifications set out in DMURS and the National Cycle Manual.
  - c) A Parking Management Strategy including detail on the breakdown of parking by type and land use.
  - d) Details of the design of bicycle parking / storage, which should accord with the provisions of the Guidelines on Sustainable Urban Housing: Design Standards for New Apartments.
  - e) A Quality Audit that includes: (i) Road Safety Audit, Access Audit, Walking Audit and Cycle Audit. The Road Safety Audit should include the design and layout of the proposed basement / undercroft car park.
  - f) A Servicing and Operations Management Plan.

A Traffic and Transport Assessment (TTA) has been prepared by Arup. The scoping of the assessment has been agreed with Cork City Council as detailed within the TTA.

A Design Manual for Urban Roads and Streets and the National Cycle Manual – Compliance Statement has been prepared by Arup. The statement concludes that the

*“proposed development design is considered to be in line with the ethos and recommendations and principles outlined in DMURS, and furthermore it is also considered to be in line with the recommendations and design criteria outlined in the National Cycle Manual”.*

Arup have prepared a Car Parking Management Strategy for the 268 no. residential car parking spaces and the 10 no. visitor car parking spaces. The Mobility Management Plan prepared provides an assessment of the site accessibility, presents the objectives of the MMP to encourage sustainable modes of travel, sets mode split targets and identifies initiatives to meet these targets.

A Quality Audit on the proposed scheme was carried out by Barry & Partners Consulting Engineers. The Quality Audit comprises a Stage 1 Road Safety Audit, Access Audit and Cycle Audit.

The Servicing and Operations Management Plan outlines that:

*“outgoing servicing will typically be associated with the collection of municipal waste generated by residents of the development, whilst incoming servicing would typically include deliveries to the residential and retail elements of the development.”*

The report prepared by Arup in response to An Bord Pleanála Opinion sets out the proposed strategy for managing both incoming and outgoing vehicles serving the proposed development.

- 13 A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) should also be submitted.

A Building Lifecycle Report prepared by C + W O'Brien Architects addresses the requirements as outlined in the Apartment Guidelines, 2020. The report summarises that the:

*“Considered scheme design and choice of building materials, together with the effective management by the appointed Property Management Company and each homeowner playing their part, will help contribute towards a desirable, vibrant community into the future.*

*The report considers the use of durable materials and finishes for external elevations (e.g. brickwork and metal railings) so as to reduce the need for regular maintenance and/or replacement, outside of general housekeeping works. The choice of such high quality and long-lasting materials, will minimise maintenance costs for residents and occupiers into the future. A similar approach is proposed in the choice of building material for internal finishes, for electrical and plumbing installations, and for landscaping of public and private open space areas.*

*As the building design develops and material choices are confirmed, this document is to be updated to help inform the appointed property management company of expected running and maintenance costs for the development, and to aid more accurate scheduling of works and service charge budgets.”*

- 14 A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, landscaping and paving, pathways, entrances and boundary treatments. Particular regard should be had to the requirement to provide high quality, durable and sustainable finishes which have regard to the context of the site.

The proposed materials and finishes to the scheme are provided in Sections 12 of the Architectural Design Statement prepared by C+W O'Brien Architects. The proposed landscaping, paving and boundary treatments are detailed at Sections 12.0 and 15.0 to 17.0 of the Landscape Design Strategy prepared by Park Hood Landscape Architects. Precedent images of the proposed high quality and durable materials and finishes are also provided within both documents.

Verified view montages of the proposed scheme have also been prepared by Urban 3D and are enclosed with this application.

- 15 Detail of areas intended to be taken in charge by the local authority, including any surface water management features within such areas.

It is not intended that any areas will be Taken in Charge in our Client's ownership will be taken in charge by Cork City Council.

- 16 An Aeronautical Assessment should be undertaken in respect of the proposed development which should include consideration of potential construction and operational impacts on instrument flight procedures and equipment at Cork Airport.

An Aeronautical Assessment Report prepared by O'Dwyer & Jones Design Partnership is enclosed as part of the application documentation and confirms that the proposed development complies with all aviation and aeronautical requirements affecting the site.

- 17 The application should respond to the objective of the City Development Plan for the continuation of the riverfront Marina Walk amenity route in a westerly direction toward the city centre.

The proposed scheme does not prejudice the future delivery of a continuation of Marina Walk to the west beyond Shandon Boat Club. As detailed in the accompanying documents, lands to the south of Shandon Boat Club in our client's ownership are either excluded from this application or zoned Public Open Space. The proposed landscape masterplan allows for the continuous movement of pedestrians east and west long Marina Walk by proposing 4 no. pedestrian bridges across the existing watercourse.

- 18 The application should give consideration to incorporating publicly accessible viewing areas in prominent tall buildings which would afford wider views across the city.

The Design have duly considered the feasibility of providing a publicly accessible viewing area within Block A. However, given the residential nature of the building occupancy of the block as residential containing homes and the additional requirements that would be

needed for Health & Safety, Fire and Emergency access/escape to provide public access to the upper levels, it was felt that it would not be appropriate to bring members of the public into the upper levels of the building.

- 19 The application should identify and address any requirements arising from the presence of COMAH sites in the surrounding area.

Goulding Chemicals Ltd on Centre Park Road is identified as a Lower Tier COMAH establishment. There are no Upper Tier COMAH sites in the South Docklands. The Construction Environmental Management Plan prepared by Arup has considered the Goulding Chemicals Ltd site. The CEMP outlines that the development has been designed in accordance with international best practice to mitigate against the risk of major accidents and/or disasters during the construction phase of the development.

- 20 The application should consider the presence of the underlying aquitard and describe the construction methodology proposed to ensure that this layer is not compromised as a result of the proposed development. Details to be provided in this regard should include the design and construction of foundations and pipes/drainage systems, and should address the risk of creating conduits for groundwater flow from the underlying saturated gravel layers and also the risk of contamination of such groundwaters.

The Construction Environmental Management Plan prepared by Arup describes the proposed construction methodology to ensure that the underlying aquitard layer is not negatively impacted. The CEMP details that the proposed building will be founded on Continuous Flight Auger (CFA) and installed using a method that does not compromise the integrity of the low permeability silt layer between the made ground and the gravel.

- 21 A Construction and Demolition Waste Management Plan and a Construction and Environmental Management Plan should be submitted which should address the presence of any hazardous materials on the site.

A Construction and Demolition and Resource Waste Management Plan and a Construction and Environmental Management Plan (CEMP) have been prepared by Arup and are enclosed as standalone documents.

A Land Contamination Remedial Strategy of the subject lands was carried out by Arup in response to the CEMP. The report identifies the contaminants of concern and details how these soils will be dealt with at construction stage.

- 22 In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.

A Statement of Consistency has been prepared by HW Planning demonstrating that the proposed development is consistent with the relevant objectives of the development plan for the subject lands. The Cork City Development Plan 2015 – 2021 is the relevant plan pertaining to the subject lands and will be in place at the Board's time of determination. The current Draft Cork City Development Plan 2022 - 2028 is due to come into effect in August 2022. Although the South Dock Local Area Plan, 2008 expired in 2018 and is

largely outdated it has been included as part of the Statement of Consistency for completeness.

23 All documents should be in a format which is searchable.

All documents have been prepared and saved in a PDF searchable format.

24 The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

An Environmental Impact Assessment Report has been prepared by Arup and is submitted with this application.

# 05 Conclusion

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The Design Team and Applicant have comprehensively addressed the items raised by An Bord Pleanála in their opinion as detailed throughout this document. The proposed development of the Former Tedcastles Site will support the realisation of the vision of the Cork City Development Plan, 2015 – 2021 and the now lapsed South Docklands Local Area Plan, 2008 to create a vibrant city quarter that will support the growth of Cork City as a competitive European city.

The central and accessible location of this brownfield site excellently lends itself to accommodate a high density development of an appropriate scale and massing that can be absorbed into its receiving environment through the use of exceptional architecture. The development of these lands is well considered with intentional design objectives demonstrated throughout the application documentation. The use of attractive and durable materials and finishes will ensure that the proposed development will be a positive addition to the South Docklands.

The subject site provides significant opportunities to create active frontage and functional public realm strategy with particular focus on Centre Park Road. The recently permitted Strategic Housing Development to the south at the Former Ford Distribution site and the adjoining lands zoned ZO 18 – Schools were also key considerations in the architectural composition of the building. The development of the Former Tedcastles site will act as a natural extension of the Former Ford Distribution site and will contribute to creating a neighbourhood centre as envisaged for this new urban quarter.

The proposed development will significantly contribute to alleviating the prevailing housing shortage by delivering 823 no. high quality residential homes that have been intentionally designed to cater for a range of household formations and sizes.



# 06 Appendix A

## Relevant Permitted/Pending Planning Applications

Application Reference	Applicant(s)	Address	Date Received	Description	Outcome/Current Status
ABP-313142-22	Tiznow Property Company Limited (Comer Group Ireland)	Former Cork Warehouse Company Site, Monahan Road, Cork	28/3/2022	Mixed-use scheme comprising 190 no. residential units, supporting residential amenity and ancillary commercial use.	Pending
Cork City Council Ref: 21/40713	Leeside Quays Limited	Kennedy Quay, to the north and Victoria Road, to the west in the South, Docklands of Cork City	07/2/2021	Rehabilitation Hospital	Request for Further Information 09/02/2022.
Cork City Council Ref: 21/40702	Leeside Quays Limited	Lands between Kennedy Quay, Marina Walk, Victoria Road and Mill Road, South Docks Cork City	02/12/2021	Mixed-use scheme comprising retail, 80 no. apartments, café and offices.	Request for Further Information 04/02/2022.

An Bord Pleanála Ref: ABP-309059-20	Marina Quarter Limited.	Former Ford Distribution Site.	23/12/2020	Demolition of existing structures and 10 year permission for the construction of 1,002 no. apartments, 5 no. retail units, childcare facilities, community resource spaces and associated site works.	Grant with conditions on 20/04/2021.
Cork City Council Ref: 19/38589 ABP- 308596-20	Tower Development Properties Ltd	North Custom House Quay and, South Custom House Quay	31/07/2019	Mixed-use development comprising hotel, retail and offices.	Grant with Conditions 22/03/2021.
Cork City Council Ref: 08/32919/x1	Alleyquay Investments Limited.	Former Ford Distribution Site.	07/03/2008	Demolition of the existing structures and construction of 564 no. apartments and 11 no. retail units	Grant with conditions on 15/07/2009. An extension of duration was granted until 12/10/2024.
Cork City Council Ref.: 10/34548	Templeford Limited	Enterprise House, Marina Commercial Park, Centre Park Road, Cork	1108/2010	10 year permission for a Mixed Use Development comprising residential, business technology/research, retail and commercial uses.	05/09/2011



