



h w p l a n n i n g

Statement of Consistency

Proposed Strategic Housing Development at Jacob's Island, Ballinure,
Mahon, Cork

Hibernia Star Limited

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Connecting places.

Contents

01	Introduction	2
01.1	Purpose of Statement	2
02	National Policy	3
02.1	Rebuilding Ireland Action Plan for Housing and Homelessness, 2016	3
02.2	Project Ireland 2040: National Planning Framework	4
03	S.28 Ministerial Guidelines	8
03.1	Sustainable Urban Housing Design Standards for New Apartments: Guidelines for Planning Authorities, 2020	8
03.2	Building Height Guidelines for Planning Authorities, 2018	11
03.3	Guidelines for Planning Authorities: Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), 2009	14
03.4	Urban Design Manual: A Best Practice Guide, 2009	15
03.5	Design Urban Manual for Urban Roads and Streets, 2013	15
03.6	Childcare Facilities: Guidelines for Planning Authorities, 2001	15
03.7	The Planning System and Flood Risk Management Guidelines, 2009	16
04	Regional Planning Policy	18
04.1	Southern Regional Assembly: Regional Spatial and Economic Strategy	18
04.2	Cork Area Strategic Plan, 2020 (CASP) and CASP Update 2008	21
04.3	Cork Metropolitan Area Transport Strategy (CMATS), 2040	22
05	Local Planning Policy	24
05.1	Joint Housing Strategy: Cork Planning Authorities	24
05.2	Cork City Development Plan 2015 -2021	24
05.3	Cork City Development Plan 2022-2028	32
05.4	Mahon Local Area Plan, 2014	45

01 Introduction

01.1 Purpose of Statement

This report of consistency has been prepared in accordance with the provisions of Section 5(2) of the Planning and Development Act, 2000 (as amended) and accompanies a Strategic Housing Development (SHD) application. The adopted SHD legislation specifies that all SHD applications must be accompanied by a statement which demonstrates that they are consistent with the relevant National, Regional and Local policies as pertaining to the proposed development.

The c. 3.95 ha subject lands are located on Jacob's Island which is situated in the south-eastern suburbs of Cork City. The site is bound to the north by the N40, to the south and west by an internal access road and to the east by the Sanctuary, an existing residential apartment scheme. The Sanctuary comprises 4 no. blocks ranging in height from part-1 to part-8 no. storeys. An operational bus terminus is located at the entrance to this apartment scheme and is enclosed within the application boundary.

The lands to the south of Jacob's Island, a peninsula on Lough Mahon, principally comprise two and three storey dwellings units and public open space known as the Joe McHugh Public Park.

The Mahon District Centre is located directly to the north of the N40 and includes Mahon Point Shopping Centre, Mahon Retail Park and City Gate Business Park.

The Passage West Greenway is located to the west of the application site providing excellent connectivity to the City Centre and to the west towards Rochestown and Passage West.

The proposed development comprises the construction of a strategic housing development of 489 no. apartments, creche, ancillary resident amenities and offices. The development will comprise 5 no. buildings ranging in height from part-1 to part-8 no. storeys over podium. The proposed development will also provide for outdoor amenity areas, landscaping, car parking, cycle stores and shelters, bin storage, plant rooms and all ancillary site development works above and below ground.

This statement of consistency has been compiled in a hierarchy according to National, Regional and Local Policy. In accordance with the Board's Guidance for Prospective Applicants this statement is intended to be clear and concise in its demonstration that the proposed development is consistent with these policies. A summary of the relevant policy from each publication has been provided in tabular format with associated comments on how the proposed scheme is consistent with same.

02 National Policy

This section will examine the relevant National Planning policies pertaining to the proposed Strategic Housing Development contained within Rebuilding Ireland Action Plan for Housing and Homelessness 2016 and Project Ireland 2040: National Planning Framework.

02.1 Rebuilding Ireland Action Plan for Housing and Homelessness, 2016

The action plan for housing and homelessness is based around 5 no. pillars, including the aim of building more homes as well as improving the rental sector. The plan includes a number of action points relating to the 5 key pillars.

Policy	Consistency of scheme
<p>Pillar 3 – Build More Homes aims to support the building of new homes and outlines the Government objective “to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs”. This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.</p> <p>The plan outlines a number of key steps that should be taken to deliver on the pillar three objective including:</p> <ul style="list-style-type: none"> ▪ Planning reforms ▪ Putting in place a National Planning Framework and land management actions ▪ Efficient design and delivery methods to lower housing delivery costs ▪ Measures to support construction innovation and skills. 	<p>The sustainable location and proposed mix of dwellings, including a social housing component, ensures that the subject proposal will contribute positively to meeting the pillar three objective of doubling the completion level of additional homes in the next four years to deliver over 25,000 homes on average per annum.</p> <p>The proposed development falls under the Strategic Housing Development planning process aimed at fast tracking the delivery of much needed housing. In addition, Section 02.2 of this document will outline how the proposal is consistent with the National Planning Framework’s stated aim of consolidating new population and housing growth within the footprint of the main towns and cities.</p>
<p>The action plan notes <i>“there is an acute shortage of apartment developments in the centre of Cork, despite a growing demand from new FDI-type employers establishing adjacent to the city centre, because of the gap between delivery costs and prices of second-hand homes in the wider Cork city area. Therefore, closing the supply gap, particularly in the right locations, is critically dependent on ensuring viability of housing provision, taking account of the prices that are</i></p>	<p>The proposed development site is located in a key sustainable location in close proximity to Mahon District Centre, where several FDI-type employers such as McAfee, Voxpro and Dell EMC are established.</p> <p>Jacob’s Island has been identified for strategic mixed-use development that will support and enhance the growth of the city centre by providing a mix of high-</p>

affordable to potential buyers and renters.”

quality units that are easily accessible by sustainable means of travel from the city centre. In addition to existing pedestrian, cycle and public transport infrastructure, Mahon is also identified as part of the future route of the planned Light Rail Transit System. The proposed development of 489 no. high quality apartment units in this location will positively contribute to alleviating the acute shortage of suitable residential units which is accelerating the lack of affordable housing in the wider Cork City area.

02.2 Project Ireland 2040: National Planning Framework

The National Planning Framework outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is to successfully accommodate growth and change, by facilitating a shift towards Ireland’s regions and cities other than Dublin, while also recognising Dublin’s ongoing role.

Policy	Consistency of scheme
<p><i>National Policy Objective 2A</i> - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.</p> <p><i>National Policy Objective 3B</i> - Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</p> <p><i>National Policy Objective 4</i> - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</p> <p><i>National Policy Objective 7</i> - Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;</p>	<p>The proposed development is consistent with all strategic aims and objectives contained in the NPF. In particular, the development is in accordance with National Policy Objectives 2a, 3b, 4, 8 and 11 which aim to increase Cork City and its suburbs to a minimum population of 314,000 by 2040 and which will require a growth rate of 50-60%.</p> <p>The proposed development contains 4,112 m2 of office space with the capacity to accommodate approximately 300 employees depending on the nature of the office-based activity and the end user’s requirements. The creation of additional employment opportunities adjacent to the existing employment centre of Mahon will support population and job growth in an existing employment centre. This is in accordance with National Objective 4 and National Objective 7.</p> <p>The proposed scheme will provide the opportunity for an uplift in population in this area by c. 1,600 no. people (based on the number of bedspaces provided) and create approximately 300 jobs. The proposed development will result in an attractive and liveable</p>

National Policy Objective 8 - Ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

National Policy Objective 11 - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 13 – In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

mixed use community with a high quality of urban design and allow future residents to enjoy a high quality of life through the integration of living, working and amenity opportunities.

The Design Team have carefully considered the integration of the proposed development as part of a wider masterplan for adjacent lands, in addition to the permitted mixed-use scheme on Jacob's Island (ABP-301991-18). In combination with the neighbouring permitted scheme, we submit that proposed mixed-use development will contribute to the delivery of a sustainable gateway development. The subject lands are located in close proximity to the Mahon District Centre where a strong employment base has been established, therefore supporting the viability of the district centre, by providing a choice in housing tenure for employees. The proposed development will encourage more people and more jobs within the existing successful Mahon area in accordance with National Objective 11.

The proposed development is primarily part-1 to part-8 no. storeys in height. The taller office element of the scheme is located towards the north of the site where increased heights can be absorbed into the skyline. The proposed heights have been designed having regard to the assessment of the permitted 6 - 25 no. storey scheme on the Jacob's Island (ABP Ref: APB-301991-18) where the Inspector was of the opinion that

"With respect to block 3, a combination of a 9 storey block with a 25 storey tower, this is a significantly different scale of development but not entirely unexpected. The Mahon LAP identifies this spot on Jacob's Island to provide a landmark tall building denoting the significance of this specific location of importance in the urban structure of Cork and the wider harbour area".

Technical Daylight, Sunlight and Shadow Assessments for the proposed scheme have been prepared by ARC Architects and are enclosed as Appendix 13.2 of the accompanying EIAR. In addition, Appendix 13-1 of the EIAR contains a Wind Microclimate Study prepared by B-Fluid Ltd.

National Policy Objective 27 - Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritizing walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

Some 327 no. car parking spaces are provided comprising 246 no. resident spaces and 75 no. commercial spaces. This is the equivalent of a resident car parking ratio of 0.5 no. spaces per unit.

The location of the subject site adjacent to the River Lee/Lough Mahon Waterfront Greenway and the Passage West Greenway presents a significant opportunity to promote walking and cycling as primary modes of travel from the subject site. The 2 no greenways will provide future residents with a pleasant and high-quality recreational amenity whilst also providing a safe and accessible method of getting to and from employment centres such as Cork City, Mahon District Centre and Mahon Industrial Estate.

Figure 02.1 Extract from TIA prepared by Sweco



The proposed scheme will provide 1,145 no. cycle parking spaces comprising 816 no. secure resident cycle spaces and 245 no. visitor cycle spaces to promote sustainable modes of travel. A further 84 no. cycle spaces are proposed for the use of the office and creche developments. The enclosed Traffic and Transport Impact Assessment and Mobility Management Plan prepared by Sweco identifies the sustainable transport modes available from the subject site and concludes ‘

‘The proposed development at Jacob’s Island is compliant with all local and national planning policies including the Mahon Local Area Plan, 2014 and the Cork City Development Plan 2015-2021 and Draft Cork City Development Plan 2022’.

National Policy Objective 32 - To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33 - To prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Key Future Growth Enablers for Cork Include;

The development of a much-enhanced Citywide public transport system to incorporate subject to further analysis, proposals for an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport.

The NPF indicates

It is also necessary to grow and diversify Cork's employment base. This means creating the conditions to attract and retain talented innovators and entrepreneurs and to be accessible to investors.

The proposal will contribute directly to a positive increase in residential density in the area, whilst appropriately respecting the established built environment. The proposed development has a net density of 137.7 no units per ha. We note that the adjacent scheme recently permitted on Jacob's Island (ABP Ref: APB-301991-18) has a density of 137 no. units per hectare. The proposed density will support the consolidation of development along key transport corridors as set out in Cork Metropolitan Area Transport Strategy. This includes an east-west corridor from Mahon through the city centre to Ballincollig.

The proposed development will diversify Cork's employment base through the creation of an integrated mixed-use community, which could attract and retain talented innovators and entrepreneurs and to be attractive to investors.

National Policy Objective 35 - Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

The proposed development represents the proper planning and sustainable development of appropriately zoned and currently underutilised lands in an existing urban area. High density development is appropriate on lands adjacent to high frequency transport structure such as the current bus service and proposed LRT.

National Policy Objectives 64:

Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.

The proposed development is located directly to the east of the Passage Greenway and within close proximity of Joe McHugh Public Park (within c. 3 no. minute walk), which provides access to the River Lee/Lough Mahon Waterfront Greenway. The proposed layout of the scheme will provide vital connects from the scheme to existing walking and cycling infrastructure on Jacob's Island therefore providing enhanced access to both Mahon District Centre and Cork City centre.

The proposed development aspires to encourage future residents to use walking, cycling and public transport as their dominant modes of travelling given the accessible location of the subject lands.

03 S.28 Ministerial Guidelines

This section provides an outline of the relevant Guidelines issued by the Minister in accordance with Section 28 of the Planning and Development Act 2000 (as amended), namely the Design Standards for New Apartments: Guidelines for Planning Authorities, 2020 and the Urban Development and Building Height Guidelines for Planning Authorities, 2018.

Section 28(1)(c) of the Planning and Development Act 2000 (as amended), specifies that these guidelines “may contain specific planning policy requirements that, notwithstanding subsection (1), are required to be applied by planning authorities and the Board in the performance of their functions”.

03.1 Sustainable Urban Housing Design Standards for New Apartments: Guidelines for Planning Authorities, 2020

The updated 2020 Guidelines refer to the need to significantly increase supply as a key pillar of the overarching Rebuilding Ireland Housing Action Plan. Urban Areas are identified as the most suitable locations for apartments and are divided into 3 categories: 1. Central and/or Accessible Urban Locations, 2. Intermediate Urban Locations, 3. Peripheral and/ or Less Accessible Urban Locations.

Policy	Consistency
<p>Section 2.4 of the Guidelines define Central and/or Accessible Urban Locations’ as:</p> <p>Sites within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;</p> <p>Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and</p>	<p>We consider that the proposed development site can be defined as a Central and/or Accessible Urban Location that is suitable for high-density, large-scale development comprising wholly of apartments.</p> <p>The site is located within walking distance of significant employment locations including established commercial and industrial uses in Mahon including Mahon Point Shopping Centre, Mahon Point Retail Park and Mahon Industrial Estate. It is noted that the Mater Private Hospital is located in City West Business Park to the north, a 9 no. minute walking distance (750 m).</p> <p>Jacob’s Island is served by an existing 15 no. minute combined peak time frequency bus route from Cloghroe to Jacob’s Island (Route no. 215/215A). In addition, bus services are available from City Gate and Mahon Point shopping centre (Route Nos. 202, 202A, 212 and 219) providing greater connectivity for existing and future residents on Jacob’s Island.</p>

Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10-minute peak hour frequency) urban bus services.

These definitions are meant to be interpreted as typical rather than 'exhaustive' and the Guidelines indicate that the full range of locations 'will require local assessment that further considers these and other relevant planning factors'.

The Guidelines contain various Specific Planning Policy Requirements and objectives that apply to the proposed development.

The proposed high-capacity Light Rail Transit (LRT) public transport corridor from Mahon to Ballincollig will further enhance the suitability of Mahon for high density development.

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

There are 1 no. studio (0.2%) and 161 no. one bed units (32.9%) proposed, in combination representing 33% of the overall housing mix in compliance with SPPR1.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas

- Studios (1 person) – 37 sq m
- 1-bedroom apartment (2 persons) – 45 sq m
- 2-bedroom apartment (3 persons) – 63 sq m
- 2-bedroom apartment (4 persons) – 73 sq m
- 3-bedroom apartment (5 persons) – 90 sq m

The Housing Quality Assessment prepared by O'Mahony Pike Architects demonstrates that the 489 no. apartments (1 no. studios, 161 no. one bed and 327 no. two bed units) are in accordance with the space standards set out in SPPR 3.

Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

As outlined in the accompanying Design Statement prepared by OMP Architects, the proposed scheme achieves dual aspect in 50.7% of the proposed units. This is in excess of the 33% minimum for central/accessible locations as outlined in the 2020 Apartment Guidelines.

Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

The proposed floor to ceiling heights at ground floor level are minimum 2.7 m therefore the development is fully in accordance with SPPR 5.

Specific Planning Policy Requirement 6

A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.

The proposed development does not exceed the maximum of 12 no. apartments per floor per core.

Section 4.17:

A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.

The Apartment Guidelines require the provision of 1,061 no. bicycle parking spaces. In line with this the scheme provides 816 no. secure resident spaces and 245 no. visitor spaces in accordance with the guidelines (total of 1,061 spaces). In addition, 84 no. cycle parking spaces are also provided to serve the commercial uses, resulting in a provision of 1,145 no. bicycle parking spaces overall.

<p>Minimum floor areas for communal amenity space:</p> <p>One bedroom- 5 sq m</p> <p>Two bedroom (3 person) 6 sq m</p> <p>Two bedroom (4 person) 7 sq m</p> <p>Three bedroom- 9 sq m</p>	<p>The development has a requirement to provide 3,006 sq m of communal space based on the proposed unit mix. The proposed scheme provides for 3,470 sq m, therefore exceeding the minimum quantum set out in the guidelines.</p>
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03.2 Building Height Guidelines for Planning Authorities, 2018

The Building Height Guidelines have arisen from a recognition that the ambitious targets contained within the NPF, particularly in relation to accommodating 50% of future growth within the existing footprint of our cities, will not be met unless developments of greater height and scale are supported by the Planning Authorities. The guidelines refer to the traditional building heights in our urban areas which have been limited and generally low rise in terms of height. The need to secure compact and sustainable urban growth forms will require the reuse of brownfield infill sites that are located in well serviced urban locations and are served by good public transport links.

Policy	Consistency
<p>The guidelines refer to locations that would be considered City and town centres, such as within the ring in Dublin and other analogous areas in other cities. In such areas, the guidance suggests that building heights of at least 6 storeys should be supported at street level, particularly where there are concentrations of enabling infrastructure to cater for such development and where architectural, urban design and public realm outcomes would be of very high quality.</p>	<p>We consider that the existing and proposed infrastructure including the planned public transport upgrade for a Light Rail Transit corridor (LRT) from Mahon to Ballincollig as outlined in the CMATS demonstrate that the subject lands are capable of accommodating building heights.</p> <p>It should be noted that 6 to 25 no. storeys were recently permitted on adjacent lands by An Bord Pleanála (ABP Ref: APB-301991-18).</p> <p>The proposed development will provide for a high quality architectural, urban design and public realm response in this location as outlined in the various supporting documentation submitted as part of this pre-planning submission.</p>
<p>SPPR1 - In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/City cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning</p>	<p>The proposed development site is considered to be ideally located adjacent to a future high frequency public transport corridor which will provide strong connectivity to the wider Cork metropolitan area.</p>

Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

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.
- 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.

Jacob's Island is currently served by the 215 and the 215A services, which operate at a 15-minute combined frequency. These services route directly into Jacob's Island and are provided with a dedicated bus turnaround area outside the existing Sanctuary development. This turnaround area acts as the outbound terminus for these services and the bus stop has been upgraded to provide a high-quality, sheltered waiting area for passengers.

The 202/202A route, which currently operates at a 10-minute combined frequency, and the 212 route, which currently operates at a 1-hour frequency have recently been enhanced and extended directly into Mahon Point Shopping Centre, to the north-east of the subject site, which places it at a convenient walking distance from Jacob's Island. The 219 Southern Orbital Route also serves the Mahon area along St. Michael's Drive. CMAT's high-capacity light rail public transport corridor from Mahon to Ballincollig will further enhance the frequency of public transport from Jacob's Island (c. 5 no. minute frequency).

The part-1 to part-8 no. storey development will provide an appropriate higher density development on a strategically located brownfield site that will integrate with adjoining sites as demonstrated in the masterplan document prepared by O'Mahony Pike Architects.

At the scale of district/ neighbourhood/ street

- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape
- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be

The proposed development will provide an appropriate transition from the existing and permitted developments on Jacob's Island which range from low density 2 storey residential units to a 25-no. storey high density building. The architectural language of the proposed development ensures that the scheme is integrated and appropriately scaled within its receiving context. The detailed design and appropriate set downs at certain locations provides for an urban form that is consistent with surrounding developments including the permitted scheme to the east under APB Ref. 301991-18.

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 proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.
- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

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.

Specific Assessments

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.

The accompanying Design Statement demonstrates that the redevelopment of this brownfield site will significantly improve the urban landscape by using high quality and robust materials. The scale, height and massing of the proposed development will act as key wayfinding points on entering Jacob’s Island and will provide enhanced connections to the Passage Greenway to the west and the River Lee/Lough Mahon Waterfront Greenway to the south and east.

It should also be noted that a Flood Risk Assessment prepared by MMOS Consulting Engineers is enclosed as part of this SHD application (refer Section 2 of accompanying Engineering Report).

The Design Team have developed the proposed scheme having regard to natural daylight, ventilation and views and to minimise overshadowing and loss of light. We note that 50.7% of units are dual aspect providing greater daylight, views, and ventilation. As noted in the architectural design statement, O’Mahony Pike Architects have been liaising with ARC Architectural Consultants in respect of the technical assessments. A Sunlight and Daylight Access Analysis has been prepared by ARC Architectural Consultants and is included as Appendix 13.2 of the accompanying EIAR.

An Appropriate Assessment Screening was prepared by Atkins and is enclosed as part of the Natura Impact Statement that accompanies this application. In addition, Chapter 9 – Biodiversity - of the accompanying EIAR specifically examines the sensitivities and interactions of the receiving environment. As previously noted, a Sunlight and Daylight Access Analysis and Wind Microclimate Study have also been carried out, and are appended to the EIAR (Volume III).

Further to the above assessment, a Landscape and Visual Impact Assessment has been prepared by AECOM and is located under Chapter 4 of the enclosed EIAR. The report identifies and assesses the potential for effects arising from the development, supported by 12 photomontages

- 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.

from representative viewpoints. This analysis confirms there will be no adverse or negative visual effects arising from the proposed development, and that proposed heights are appropriate having regard to the adjoining permitted development context.

We consider that the proposed development on this strategically important and accessible site on Jacob's Island has been suitably designed in terms of height in response to its receiving context.

03.3 Guidelines for Planning Authorities: Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), 2009

The Sustainable Residential Development in Urban Areas, 2009 provides statutory guidelines which will assist planning authorities, developers, architects and designers in delivering high quality residential development. The objective of the document is to produce high quality and crucially sustainable developments. The guidelines mentioned in the table below are aimed at assisting planning authorities, developers, architects and designers to create quality homes and neighbourhoods at places where people want to live, work and raise families.

Policy	Consistency
<p>The guidelines outline the common goals of housing developers, their design teams, the planning system and the community as follows:</p> <ul style="list-style-type: none"> ▪ Prioritise walking, cycling and public transport, and minimise the need to use cars; ▪ Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience; ▪ Provide a good range of community and support facilities, where and when they are needed and that are easily accessible; ▪ Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained; ▪ Are easy to access for all and to find one's way around; ▪ Promote the efficient use of land and of energy, and minimise greenhouse gas emissions; ▪ Provide a mix of land uses to minimise transport 	<p>A Design Statement prepared by O'Mahony Pike Architects and a Planning Statement prepared by HW Planning accompany this SHD application and address the best practice design principles outlined in the guidelines to create a sustainable neighbourhood where people want to live and work.</p> <p>The proposed development is located on appropriately zoned mixed-use lands and will represent the suitable sequential development of lands having regard to the original scheme permitted on Jacob's Island for the construction of 413 no. apartments, neighbourhood centre, creche and road improvements (ABP Ref: APB-301991-18).</p> <p>In addition to the Design Statement, O'Mahony Pike Architects have prepared a masterplan for the wider area which includes an examination of the wider surrounding context. A Statement on</p>

demand;

- Promote social integration and provide accommodation for a diverse range of household types and age groups;
- Enhance and protect the green infrastructure and biodiversity; and
- Enhance and protect the built and natural heritage.

Rationale for Childcare Provision has been prepared by HW Planning as part of this application. A School Demand Assessment and Social Infrastructure Audit have been carried out as part of Chapter 13 – Population and Human Health - of the accompanying EIAR.

03.4 Urban Design Manual: A Best Practice Guide, 2009

The proposed mixed-use development has been designed in accordance with best practice as outlined in the 2009 Urban Design Manual. The Manual outlines 12 criteria that should guide urban residential development in the context of the individual homes, the site on which they are located and the wider neighborhood. The Design Statement prepared by O'Mahony Pike Architects provides a comprehensive response to the each of the criteria set out in the guidelines and demonstrates that the proposed development represents the proper planning and sustainable development of the subject site.

03.5 Design Urban Manual for Urban Roads and Streets, 2013

The Design Manual for Urban Roads and Streets provides guidance relating to the design of urban roads and streets. The document presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to street networks and individual streets. The relevant principles, approaches and standards listed in the table below are intended for use by suitably qualified and experienced designers who work within the built environment professions in order to create attractive streets and roads which facilitates a broad range of users.

Relevant Principles and Guidelines	Consistency
<ol style="list-style-type: none">1. Integrated Street Networks2. Movement and Place3. Permeability and Legibility4. Management5. Movement, Place and Speed6. Streetscape7. Pedestrian and Cyclist Movement8. Carriageway Conditions	<p>This application is accompanied by a DMURS Statement prepared by Sweco. The statement addresses the relevant policies and principles listed in the Design Manual for Urban Roads and Streets, 2013 in order to create a balanced and attractive street and road network for the proposed development. A Traffic and Transportation Impact Assessment and Mobility Management Plan prepared by Sweco is also enclosed as Appendix 5.1 of the accompanying EIAR.</p>

03.6 Childcare Facilities: Guidelines for Planning Authorities, 2001

The National Childcare Guidelines for Planning Authorities provide a framework to guide both local authorities in preparing development plans and assessing applications

for planning permission, and developers and childcare providers in formulating development proposals.

Policy	Consistency
<p>Appendix 2:</p> <p>In new communities/ new housing areas, planning authorities should require the provision of at least one childcare facility for new housing areas and other areas of residential development unless there are significant reasons to the contrary.</p> <p>An indicative standard of one childcare facility per 75 dwellings is recommended. One facility providing a minimum of 20 childcare facilities is considered to be a reasonable starting point.</p> <p>The threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.</p>	<p>The proposed mixed-use development comprises 489 no. residential units. However, the requirement for a childcare facility is calculated based on the number of 2+ bed units proposed in accordance with the guidelines.</p> <p>The development will provide a creche which will have the capacity for c. 53 no. child spaces (381 sq m).</p> <p>A standalone Statement on the Rationale for Childcare Provision has been prepared by HW Planning and is enclosed as part of this application.</p>
<p>Circular PL 3/2016:</p> <p>In March 2016, the Department of the Environment, Community and Local Government issued a circular in relation to childcare facilities under the early Childhood Care and Education (ECCE) Scheme. Planning Authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 – including the minimum floor area requirements per child- from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning applications.</p>	<p>The proposed development has taken cognisance of this letter in relation to development of the creche on the site.</p>

03.7 The Planning System and Flood Risk Management Guidelines, 2009

Planning Authorities must implement these Guidelines in ensuring that, where relevant, flood risk is a key consideration in preparing development plans and local area plans and in the assessment of planning applications. The Guidelines will also assist regional authorities in preparing regional planning guidelines and should be utilised by developers and the wider public in addressing flood risk in preparing development proposals.

A site specific Flood Risk Assessment has been carried out by MMOS Consulting Engineers and is enclosed as Section 2 of the accompanying Engineering Report. The assessment which has been carried out having regard to the requirements of the Planning System and Flood Risk Management Guidelines 2009 notes that the proposed development type “...for this site is to be primarily residential. This is categorized by the guidelines as highly vulnerable development and ‘Appropriate’ to be located within Flood Zone C.”

04 Regional Planning Policy

This section will provide an overview of the relevant Regional Planning Guidelines including the Southern Regional Assembly: Regional Spatial and Economic Strategy Cork Area Strategic Plan, 2020 (CASP), CASP Update 2008 and Cork Metropolitan Area Transport Strategy (CMATS), 2040.

04.1 Southern Regional Assembly: Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy (RSES) sets out a 12-year strategic development framework for the Southern Region. The purpose of the Regional Spatial and Economic Strategies (RSES) is to support the implementation of the National Planning Framework while facilitating choices that reflect the differing needs of the regions. The strategies are proposed in the context of a renewed focus on “Regional Parity” in the NPF, being promoted to address anti-competitive pressures on Dublin by offering more sustainable choices and options for people, businesses and communities that can positively influence more sustainable patterns of living and working which benefit our entire society and make our economy more equitable and resilient.

The vision for the Southern Region is outlined in the RSES as follows:

- *Nurture all our places to realise their full potential;*
- *Protect and enhance our environment;*
- *Successfully combat climate change;*
- *Achieve economic prosperity and improved quality of life for all our citizens;*
- *Accommodate expanded growth and development in suitable locations; and*
- *Make the Southern Region one of Europe’s most creative, innovative, greenest and liveable regions.*

In terms of economic strategy, Section 4.2 of RSES indicates that The economic vision for the Region is to enable sustainable, competitive, inclusive and resilient growth. This requires the development of a strong and diverse economic base. With immediate challenges such as Brexit, global issues and potential vulnerabilities within Ireland’s enterprise base, it is important that the Region sustains what we have in the immediate term, transforms our enterprise base for longer term resilience while managing potential vulnerabilities.

The RSES seeks to achieve this vision through the following economic principles:

- *• Smart Specialisation*
- *• Clustering*

- • *Placemaking for enterprise development*
- • *Knowledge Diffusion, and*
- • *Capacity Building.*

Policy	Consistency
<p>RPO 5 – Population Growth and Environmental Criteria</p> <p>Increased population growth should be planned with regard to environmental criteria including:</p> <p>The assimilative capacity of the receiving environment.</p> <p>The proximity of Natura 2000 Sites and the potential for adverse effects on these sites and their conservation objectives.</p> <p>Areas that have potential to flood.</p>	<p>As previously iterated in respect of National Planning Policy, the proposed development will result in the uplift in population in this area by c. 1,600 no. persons.</p> <p>This application is accompanied by a Natural Impact Statement which includes an Appropriate Assessment Screening. These were prepared by Atkins assessing the impacts of the development on European Sites.</p> <p>A Site-Specific Flood Risk Assessment has also been prepared by MMOS Consulting Engineers (as part of the Engineering Report) and recognises that residential development has been appropriately located on Flood Zone C lands.</p>
<p>RPO 9 - Holistic Approach to Delivering Infrastructure</p> <p>It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives.</p>	<p>The proposed development will provide for increased population growth in an area that is well connected by pedestrian and cycle linkages and will hence promote sustainable modes of transport. The proposed Light Rail Transit (LRT) Corridor from Ballincollig to Mahon will significantly increase the connectivity of the subject site to wider surrounding areas in Cork.</p> <p>The proposed public realm improvements will provide an enhanced level of amenity in the area and will improve the overall pedestrian and cyclist experience.</p>
<p>RPO 10 – Compact Growth in Metropolitan Areas</p> <p>The prioritisation of housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.</p> <p>The identification of public realm and site regeneration initiatives which combine, on an area wide basis, opportunities for regeneration of private</p>	<p>In the 2015 Cork City Development Plan the brownfield subject lands are zoned objective Zo 20 – Mixed Use Jacob’s Island, where the stated objective is <i>“to provide for mixed use development to accommodate up to 15,000 sq m business and technology offices and residential uses.”</i></p> <p>In the Draft Cork City Development Plan 2022 this zoning has been retained as ZO 5.1 Mixed-use Development, with a specific objective to include a</p>

owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm area.

hotel and up to 20,000 m² of business and technology office use.

Our client's currently vacant and significantly underutilised site presents an opportunity for suitable development within an area envisaged for significant regeneration. The site is well located within easy walking, cycling and public transport access of a range of employment nodes.

Section 5.0: Housing and Regeneration

Section 5.0 identifies strategic housing and regeneration locations within the Cork Metropolitan area. Achieving NPF growth targets will require in depth consideration for new locations.

-

The proposed development at this brownfield site will assist in achieving the targets set out by the RSES through the delivery of 489 no. residential units, creche, offices and supporting tenant amenity facilities. The proposed development and associated masterplan have been cognisant of the objectives and infrastructure priorities for Jacob's Island throughout the design process.

We submit that the currently proposed development and future delivery of the masterplan lands will contribute to the viability and delivery of the infrastructure priorities set out in the RSES for this area.

Section 4.2 Economic Strategy

RSES seeks to achieve its economic strategy through the implementation of 5 economic principles which include Clustering and Placemaking.

In terms of Clustering, RSES indicates that

Clusters are a geographic or virtual concentration of interrelated companies, suppliers, and associated institutions. Fostering modern cluster policies is a strong feature of our Region's economic strategy.

The RSES places significant emphasis on placemaking, which involves ensuring that geographical locations are attractive places to live, learn and work.

RSES highlights that Placemaking policy is instrumental to ensuring that the Region captures sufficient human capital and talent.

The proposed development of a mixed use residential and office development at Jacob's Island is in accordance with the economic principles of RSES and together with the existing employment centre in Mahon have the potential to form a suburban cluster.

The creation and integration of residential and employment opportunities at a location with high quality amenity in the form of Joe McHugh Park and excellent connectivity provided by the Passage Greenway and the River Lee/Lough Mahon Waterfront Greenway, will ensure that Jacob's Island is an attractive place to live and work and is in full compliance with the principles of placemaking.

Section 7.2 : Light Rail Corridor

Section 7.2 identifies strategic housing and regeneration locations within the Cork Metropolitan area. Achieving NPF growth targets will require in depth consideration for new locations. The RSES considers that Mahon has developed with significant mixed-use residential, enterprise and retail uses, has potential for further development of greenfield sites and intensification of former industrial lands and improved public transport

- Potential Residential Yield: 1021 units
- New public transport bridge and route linking via Bessboro to Mahon.
- Expansion and upgrading of amenity areas and walking/ cycling routes.

Investment in retrofitting infrastructure and services (physical, social and recreational) to improve quality of life for communities.

The proposed development will assist in achieving the housing targets set out by the RSES for the Mahon region and the wider Cork MASP areas by delivering 489 no. units and the potential for 300 jobs. We consider that the proposed development will positively contribute to creating a sustainable community for existing and future residents on Jacob’s Island.

04.2 Cork Area Strategic Plan, 2020 (CASP) and CASP Update 2008

The Cork Area Strategic Plan sought to provide a framework for the development of Cork over a 20-year period from 2000 – 2020 and outlined a number of key concepts including the following:

Policy	Consistency
<p>To move towards a more sustainable form of development for the Cork Area.</p> <p>To improve access and accessibility.</p> <p>To promote integrated land use /public transport strategy.</p> <p>To match the location of new housing as closely as possible with the location of employment growth centres.</p> <p>To require an overall rise in housing densities and development that is concentrated rather than dispersed</p>	<p>The subject lands are located in a strategically accessible location in the Cork Metropolitan Area. The proposed development has been designed in accordance with the concept of improving access and accessibility for all and will promote the integration of public transport and land-use planning.</p> <p>The development of the subject lands represents the sequential development of lands to the east including the constructed apartment scheme and the permitted mixed-use scheme (ABP Ref: APB-301991-18) and will create consolidated development.</p> <p>The proposed scheme has been designed having regard to the principles of compact growth and as such proposes a net density of c. 138 no. units per hectare (based on the developable residential zone) on the currently vacant site.</p>

04.3 Cork Metropolitan Area Transport Strategy (CMATS), 2040

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. This projected population and associated economic growth will result in a significant increase in the demand for travel. This demand needs to be managed and planned for carefully to safeguard and enhance Cork's attractiveness to live, work, visit and invest in.

Policy	Consistency
<p>Key outcomes for walking in the strategy include:</p> <p>An increase in walking levels for work, education and leisure across the CMA, particularly for short journeys (less than 2-3km);</p> <ul style="list-style-type: none"> • Addressing the safety issues and barriers that prevent citizens and visitors from walking more in Cork; • Supporting a high quality and fully accessible environment for all abilities and ages by continuing to develop a safe, legible and attractive public realm; • Facilitate walking's role as part of linked trips, particularly with rail and bus journeys; and <p>Promote a far higher standard of urban design in new developments, and in highway design, in a fashion that consistently prioritises pedestrian movement and safety over that of the private car.</p>	<p>Doyle O'Troithigh Landscape Architects have prepared a detailed Landscape Masterplan and Design Strategy for the proposed development which includes identifying key pedestrian and cycle connections.</p> <p>The Landscape Design Strategy outlines that the proposed development has been designed to encourage walking and cycling as a primary mode of travel to and from the proposed development by providing pedestrian and cycle linkages along strong desire lines towards the Passage Greenway to the west and the River Lee/Lough Mahon Waterfront Greenway to the south and east. Building access points on all boundaries will encourage active street frontages.</p> <p>The proposed design will allow for residents and visitors to utilise existing and proposed public transport services from Jacob's Island.</p>
<p>The provision of LRT system will be a focal point to enable the growth of population, employment health and education uses as envisaged by the NPF 2040. The LRT system is a key enabler in CMATS. The LRT is required to:</p> <ul style="list-style-type: none"> • Unlock strategic development areas in its catchment area including the Cork City Docks, Curraheen, Ballincollig and Mahon; • Maximise the development potential of windfall sites; • Provide greater certainty for future Planning and development, to pursue higher densities required to meet NPF population and 	<p>Based on CMATS, the LRT will serve Mahon. A number of indicative stops have been identified including one directly to the north of the N40. The planned development of the LTR therefore underpins the development of a high density scheme on the subject lands. In order to maximise its sustainable location adjacent to the infrastructural investment in the LTR minimal residential parking is provided within the development (0.5 car parking ratio) to encourage residents to avail of other modes of transport.</p>

employment targets for Cork City.

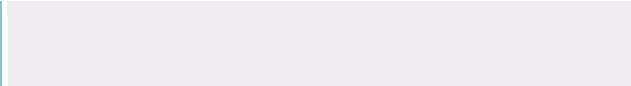
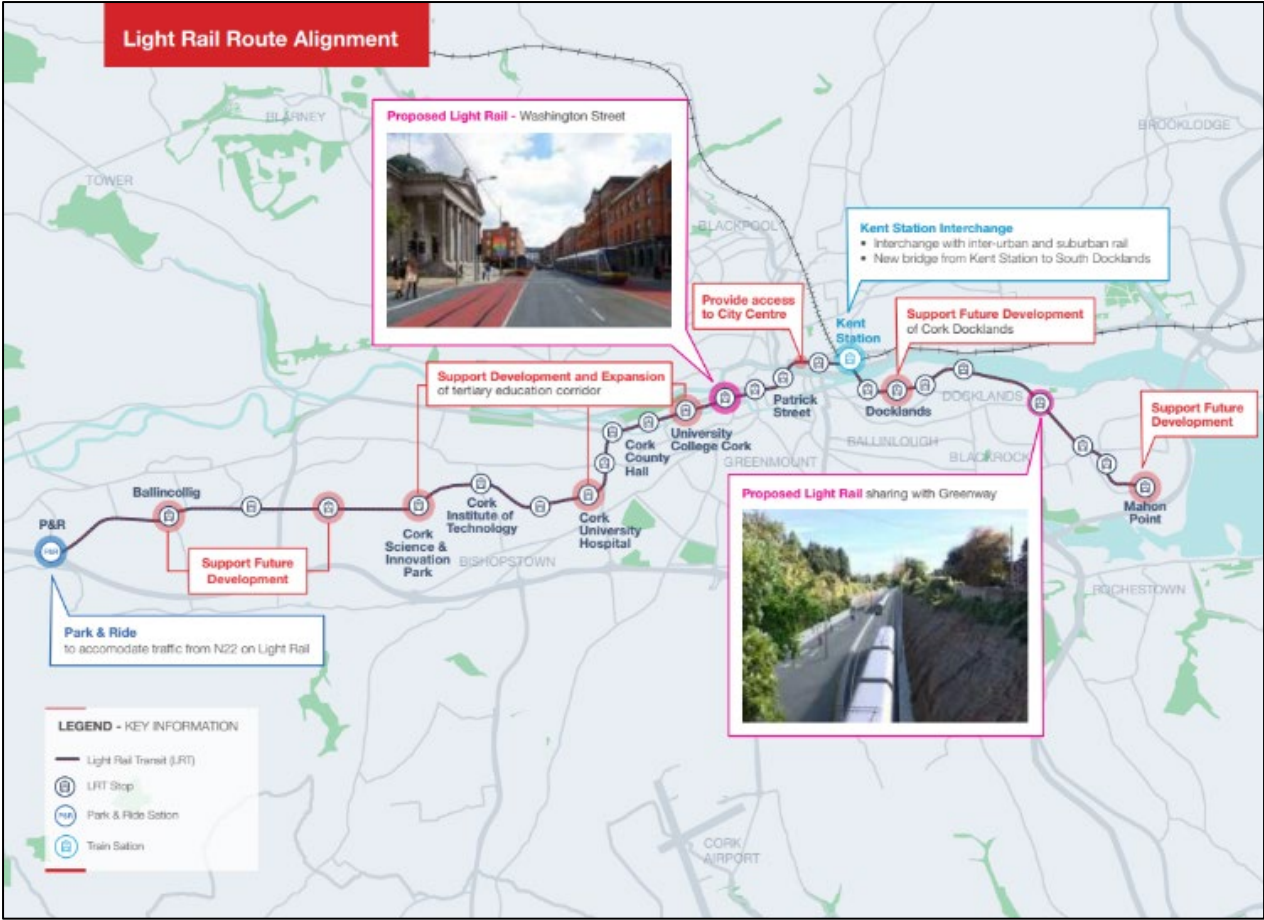


Figure 04.1 CMATS Light Rail Route from Ballincollig to Mahon



05 Local Planning Policy

05.1 Joint Housing Strategy: Cork Planning Authorities

The Joint Housing Strategy was produced in accordance with the adopted County and City Development Plans for the respective planning authorities in 2014-2015. The purpose of the housing strategy is to ensure that the proper planning and sustainable development of Cork City and County provides for the housing of the existing and future population of the area in an appropriate manner. The housing strategy sets out an overall framework for the supply of land to meet the housing needs arising in the county. Four key principles underpin the strategy with the relevant principles applicable to the proposed development illustrated in the table below:

Policy	Consistency
<p>Principle 1: To provide for a diverse range of housing needs to suit varying income levels and social circumstances.</p> <p>Principle 2: To promote a socially balanced and inclusive society in all housing areas within Cork City and County.</p> <p>Principle 3: To promote high quality and sustainable communities in the Urban and Rural Environment, though the implementation of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas published in May 2009.</p>	<p>The proposed development has been designed to cater for a range of household sizes by providing a mix of different units including studio, 1 and 2 bed apartments. A specific statement in relation to Housing Mix has been prepared by HW Planning.</p> <p>The proposed layout has been designed to enable easy access by all and complies with Part M of the Building Regulations. Building for Everyone: A Universal Design Approach. The design of the proposed development is in accordance with the 12 criteria for residential development as outlined in the 2009 Urban Design Manual: A best practice guide. This is discussed in further detail in the Design Statement prepared by OMP Architects.</p>

05.2 Cork City Development Plan 2015 -2021

The City Development Plan is Cork City Council’s main strategic planning policy document intended to guide the development of the city up to 2022. The Plan outlines the vision for Cork over the lifetime of the Plan and beyond to “*be a successful, sustainable regional capital and to achieve a high quality of life for its citizens and a robust local economy*”

Among the main goals outlined in the Core Strategy are to:

- Increase population and households to create a compact sustainable city;

- Achieve a higher quality of life, promote social inclusion and make the city an attractive and healthy place to live, work, visit and invest in; and
- Promote sustainable modes of transport and integration of land use and transportation.

The Development Plan identifies Mahon among the key future development areas in the city, recognizing that lands in this and other key locations:

“... are becoming available for development because of the decline of low density uses such as traditional industries in Docklands and elsewhere and their replacement by more intensive employment and residential uses. These areas will accommodate the majority of growth and development within the city and they are selected based on their potential to accommodate growth and to be served by sustainable modes of transport.”

Chapter 16 of the development plan outlines the various development management standards that will need to be adhered to when assessing a planning application including zoning objectives.

Zoning Objective	Consistency
<p>Zo 20 – Mixed Use Jacob’s Island</p> <p>The stated objective is <i>“to provide for mixed use development to accommodate up to 15,000 sq m business and technology offices and residential uses.”</i></p>	<p>The proposed mixed-use development will provide 489 no. residential units, creche, offices and supporting tenant amenity facilities which are permitted in principle uses on the subject lands.</p> <p>The proposed development will contribute towards addressing the acute demand for residential development and will create a sustainable residential neighbourhood with residential and employment opportunities. The attractiveness of the location is underpinned by the existing excellent connectivity offered by the 2 no. adjacent greenways and existing bus routes.</p>

The table below lists all of the relevant standards in the 2015 Cork City Development Plan and assesses the proposed scheme comprising 489 no. residential units, creche and offices against them.

Zoning Objective	Consistency
<p>Objective 3.7 Strategic Employment Locations The Cork City Council will support the development of the City Centre and Docklands as the primary strategic employment locations. Secondary locations in suburban areas at Blackpool/Kilbarry and Mahon also have potential for growth as outlined in local area plans. There is also potential for employment intensification in the future in areas such as Tivoli, Model Farm Road and the Tramore Road area.</p>	<p>The subject lands are identified in the City Development Plan as a location to accommodate future office development and will allow for the clustering and intensification of office development in the strategic employment location of Mahon.</p>
<p>Objective 5.1: Strategic Transport Objectives</p> <ul style="list-style-type: none"> ▪ Provide for the greater consolidation of development within the City Centre, Docklands, Key Development Areas and Strategic Corridors, facilitated through the integration of land use and transport planning, investment and service provision; ▪ To reduce the percentage of persons who drive to work to 60% by 2021; ▪ To encourage and facilitate cycling and walking for short/local trips by providing appropriate infrastructure, promoting “soft-measures” that influence change in transport behaviour, and by encouraging proximate, compact land uses; ▪ To encourage increased use of rail services, bus, and carpooling/ car sharing for longer journeys by providing local access infrastructure to key transport nodes, by using information, pricing mechanisms and other “soft-measures” to influence change in transport behaviour, and by encouraging public transport orientated development; ▪ To encourage the use of innovative measures to reduce the requirement for car parking; ▪ To support actions aimed at improving the fuel efficiency of motorised transport; <p>To facilitate operation (and expansion) of Cork Airport and Port of Cork, recognising their significant role in the economic vitality and quality of life of the region.</p>	<p>The proposed scheme has been designed with due regard of best practice guidance and through encouraging sustainable means of travel to and from the site by residents and visitors. In order to achieve the objectives of the Development Plan, some 1,145 no. bicycle parking spaces and reduced car parking spaces are provided (0.50 car parking ratio).</p> <p>The Light Rail Transit (LRT) east-west corridor from Mahon to Ballincollig provides a significant opportunity for high density development on a future high frequency public transport corridor.</p> <p>We consider the combination of sustainable design principles implemented in the scheme in addition to the investment in public transport in Mahon will contribute to changing transport behaviours, where the predominant means of travel to/from the subject site are walking, cycling and public transport.</p>

Objective 5.2: Transport Assessment

- Planning applications for substantial developments (i.e. those that Cork City Council considers may have significant travel implications) shall include a Transport Assessment; the assessment shall demonstrate how sustainable transport patterns can be achieved by the development.

A Traffic and Transport Impact Assessment prepared by Sweco is included as Appendix 5-1 of the EIAR that accompanies this application. It highlights how the proposed development would address traffic and transportation issues, traffic generation, pedestrian and cycle linkages, safety, public transport availability and capacity.

Objective 5.6: To develop land use strategies that provide for the consolidation of development at higher densities along key public transport corridors.

The proposed development will provide a high-density development along the future high frequency LRT corridor.

Objective 5.10: The design of pedestrian and cycling infrastructure will be in accordance with the principles, approaches, and standards set out in the National Cycle Manual, the Design Manual for Urban Roads and Streets and international best practice.

The proposed development has been designed having regard to the National Cycle Manual, the Design Manual for Urban Roads and Streets and international best practice. A Traffic and Transport Impact Assessment Report (included as Appendix 5-1 of the EIAR that accompanies this application) and DMURS Statement have been prepared by Sweco and are enclosed with this SHD application.

Objective 6.1: Residential Strategic Objectives

- a. To encourage the development of sustainable residential neighbourhoods;
- b. To provide a variety of sites for housing to meet the various needs of different sections of the population;
- c. To continue to work with the Approved Housing Bodies and to actively engage with all key stakeholders in the provision of housing;
- d. To continue to regenerate and maintain existing housing;
- e. To encourage the use of derelict or underused land and buildings to assist in their regeneration;
- f. To promote high standards of design, energy efficiency, estate layout and landscaping in all new housing developments;
- g. To protect and, where necessary, enhance the amenities and the environment of existing residential areas.

The proposed development will provide a mix of residential unit sizes, ranging from studio to two bed units, to cater for a range of household formations that will encourage a sustainable residential neighbourhood. A Statement on Housing Mix, prepared by HW Planning accompanies this application.

We submit that the development of these currently underutilised lands in Mahon will provide much needed housing to meet population demands

Objective 6.3: Objective 6.3 Social Housing under Part V

To require that 14% of units on all land zoned for residential uses (or for a mix of residential and other uses) to be reserved for the purpose of social housing and specialised housing needs. Each

In accordance with the Planning and Development Regulations, 2021(as amended), Part V, Section 96 of the Planning and Development Act 2000 (as amended) and Housing Circular 28/2021, the relevant social housing allocation is 10%.

application subject to Part V requirements will be considered on an individual basis to the prior agreement of the Local Authority.

Please see the enclosed Part V Proposal prepared by HW Planning and the Part V drawings prepared by O'Mahony Pike Architects.

Objective 6.8: Housing Mix

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

The proposed development provides for a mix of studio, 1 and 2 bed apartments to cater for a variety of household formations including singles, couples, and small families across the full age spectrum. A Schedule of Accommodation and a Housing Quality Assessment have been prepared by O'Mahony Pike Architects and are enclosed as part of this application, detailing that the proposed unit mix is in accordance with the Apartment Guidelines.

Objective 7.18: Safe City

- a. To ensure a well-integrated urban form that provides a safe environment for all users by maximising visibility and surveillance, increasing pedestrian activity and maximising connections between areas;
- b. To encourage the ongoing maintenance and upkeep of the public realm, keeping spaces free of graffiti and litter etc.

The architectural design approach ensures that that public and communal areas are subject to passive surveillance and will not encourage anti-social behaviour by creating undesirable or secluded areas. A Building Lifecycle Report also accompanies this application which demonstrate how it is intended to maintain and manage the public and communal areas.

Objective 7.7: Childcare Facilities

Cork City Council will support the provision of high-quality childcare facilities throughout the city suited to the needs of a given area and will:

- Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered;
- Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed.

The proposal will deliver a childcare facility in Block 13 of the proposed development (381 sq m) which will have the capacity for 53 no. childcare spaces. A Childcare Needs Assessment, prepared by HW Planning accompanies this application. Consultation was undertaken with Cork City Childcare as part of the preparation of the EIAR. Their feedback directly informed the design of the childcare facility where possible.

Objective 10.6: Views and Prospects

To protect and enhance views and prospects of special amenity value or special interest and contribute to the character of the City's landscape from inappropriate development, in particular those listed in the development plan. There will be a presumption against development that would harm, obstruct or compromise the quality or setting of

A Townscape and Visual Impact Assessment has been prepared by AECOM and is enclosed as part Chapter 4 of the enclosed EIAR. The Chapter identifies and assesses the potential for effects arising from the development, supported by 12 photomontages from representative viewpoints. This analysis confirms there will be no adverse or negative visual effects arising from the proposed development having regard to key defined views and prospects.

linear views of landmark buildings, panoramic views, rivers prospects, townscape and landscape views and approach road views.

To identify and protect views of local significance through the preparation of local area plans, site development briefs and the assessment of development proposals on a case-by-case basis

Objective 10.10: Trees and Urban Woodland

- a. To protect and enhance the city's tree and urban woodlands;
- b. To protect, survey and maintain existing important individual and groups of trees;
- d. To ensure that new development benefits from adequate landscape structure / tree coverage, particularly in areas of the city with inadequate tree coverage.

A Tree Survey was undertaken by Arborist Associates Ltd. and its findings incorporated into the Landscape Design Report prepared by Doyle O'Troithigh Landscape Architects.

A comprehensive Arboricultural Assessment also accompanies this application.

Objective 11.7: Public Open Space

- a. To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes. There will be a presumption against development of land zoned public open space for alternative purposes;
- c. To promote public open space standards generally in accordance with national guidance contained in Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DEHLG, 2009) and the accompanying Urban Design Manual – A Best Practice Guide;
- d. The development of open spaces should aim to enhance and protect natural features and views and be set in safe and secure environments with the emphasis on active open spaces accessible to and enjoyed by all sectors of the community;
- e. To follow an approach of qualitative as well as quantitative standards for open spaces providing high quality open spaces with high levels of access to recreation for local communities;

Doyle O'Troithigh Landscape Architects have prepared a detailed Landscape Design Report for the proposed development demonstrating that both qualitative and quantitative levels of functional open space are provided within the scheme.

The proposed landscape plan aims to provide a variety of spaces for residents and visitors of a range of ages and abilities to socialise, exercise and play. The central open space will provide passive and active recreation in a safe environment which is directly supervised by the surrounding buildings. As detailed in the accompanying Landscape Design Report a key consideration in the design of the central open space is the creation of play and stay areas. In addition, more informal play pockets of open space are provided throughout the scheme.

The Design Team have carefully considered the desire lines of existing and future residents on Jacob's Island therefore a key focus of the landscape strategy is to provide valuable pedestrian and cycle connects throughout the application site to connect to existing networks to the west and south, including the Passage Greenway and the River Lee/Lough Mahon Waterfront Greenway to the south and east.

The proposed landscape plan will support and enhance the biodiversity of the subject site through the use of native species and the creation of an ecological garden along the northern boundary.

Objective 11.13: Amenity Routes

To pursue the development of a network of high-quality amenity routes, particularly along waterways, and linking existing and proposed parks and public open spaces, and to work with Cork County Council and other stakeholders to achieve and improve external linkages subject to Ecological Assessment and Appropriate Assessment Screening.

The proposed development is located directly to the east of the Passage Greenway amenity route. Proximity to the greenway and the Joe McHugh public park linking with the River Lee/Lough Mahon Waterfront Greenway to the south and east will provide excellent amenities for future residents of the scheme to utilise.

A Natura Impact Assessment with Appropriate Assessment Screening has been prepared by Atkins and is enclosed as part of this application.

11.15 Children's Play Facilities

To seek the provision of children's play facilities in new developments and particularly in new larger residential developments of 75 units and over. Facilities for young children aged 0-5 should be provided within easy walking distance of homes or within the cartilage of apartment blocks. Older children should have access to larger equipped play areas within 5 minutes walk of home.

A designated creche play area has been provided as part of the proposed development. Play facilities provided as part of the proposed scheme. It should be noted that the subject site benefits from adjacency to the Joe McHugh Park (c. 2-3 no. minute walking distance) which will provide valuable amenities for future residents and visitors to the proposed scheme.

Objective 14.1: Mahon Local Area Plan

The local area plan vision for Mahon will be achieved by:

- a) Expanding the population and improving residential amenity;
- b) Gradually replacing low density industry with higher density employment accessible to those living in the area;
- c) Creating strong focal places at Mahon Point and Neighbourhood Centres providing local services and a physical focus for their areas;
- d) Supporting a shift to non-car modes for transport, environmental, social and health reasons; and

Conserving landscape, built heritage and environmental assets.

The masterplan, enclosed in Section 4 of the Design Statement prepared by OMP Architects demonstrates how the proposed development will successfully integrate into its receiving environment. The development in combination with the permitted 413 no. apartment units, neighbourhood centre, creche and road improvements (ABP Ref: APB-301991-18) will contribute to the supply of residential units and the delivery of Mahon as a sustainable gateway location. The scheme has been designed having regard to the relevant quantitative standards as outlined throughout this document and will deliver a high-quality development on an excellently located site that is easily accessible from Cork City Centre.

Objective 16. 1 Design Statement

All significant planning applications shall submit an accompanying design statement which provides a framework explaining how a proposed development is a suitable response to the site and its setting.

A Design Statement has been prepared by O'Mahony Pike Architects to accompany this application which demonstrates how the proposed development is a suitable response to the site and its setting.

<p>Objective 16.2: Visual Impact Assessments All significant planning applications shall submit an accompanying visual impact assessment.</p>	<p>A Townscape and Visual Impact Assessment prepared by AECOM is included in Chapter 4 of the accompanying EIAR.</p>
<p>Objective 16.3 Urban Design - To deliver high quality built environments through good place making; - To ensure that development is designed to high qualitative standard and is cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking and detailed design.</p>	<p>The proposed development has been designed to all relevant Urban Design criteria as set out throughout this document.</p>
<p>Objective 16.4 Skyline and roofscapes The City Council will seek new buildings to be designed to: - enhance the roofscape in terms of their bulk, massing, materials and aesthetics; - where appropriate, divide building mass into smaller elements which respect the existing cityscape and the setting and views and prospects of landmark buildings and the other special amenity views; - where appropriate locate plant housing for buildings in basements to avoid impact on views of cityscape.</p>	<p>The Design Statement prepared by O'Mahony Pike Architects provides a robust justification for the scale and massing of the proposed development at this location. The CGIs enclosed as part of the Design Statement illustrate the contemporary architectural concept which will be delivered through the use of high-quality building materials.</p>
<p>Objective 16.6 Creating Adaptable Buildings The City Council will seek to ensure that new buildings are designed to be flexible and adaptable throughout the city.</p>	<p>The scheme has been designed to be flexible and adaptable with minimum 2.7 m floor to ceiling heights at ground floor level.</p>
<p>Objective 16.7 Tall Building Locations The City Council will aim to protect the special character of Cork City which have been identified as having potential for tall buildings. These are South Docklands & South Mahon. (Locations are indicated on Zoning and Objectives Maps in Volume 2).</p>	<p>There are no 'tall building designations' pertaining to the subject lands, though South Mahon has been identified as a location suitable for tall buildings.</p>
<p>Objective 16.9 Sustainable Residential Development Residential developments shall be sustainable and create high quality places and spaces which:</p>	<p>The objective of the proposed scheme is to deliver a high-quality environment for future residents that will integrate with the existing residential development, permitted development and masterplan lands to the north. The delivery</p>

- a. Deliver a quality of life which residents and visitors are entitled to expect in terms of amenity, safety and convenience;
- b. Provide adequate open space which are practical in terms of scale and layout and naturally supervised by the aspect of the dwellings it serves;
- c. Provide a good range of suitable facilities;
- d. Prioritise walking, cycling and public transport and minimise the need to use cars;
- e. Present an attractive appearance with a distinct sense of place;
- f. Are easy to access and navigate;
- g. Promote the efficient use of land in terms of density and plot ratio;
- h. Promote social integration and provides accommodation for a diverse range of household types and age groups;
- i. Enhance and protect the built and natural heritage.

of the public transport corridor along Centre Park Road will further increase the attractiveness of the Jacob's Island as a place to live and work.

The submitted documentation demonstrates that the scheme comprising 489 no. residential units, creche, offices and supporting tenant amenity facilities is consistent with objective 16.9.

05.3 Draft Cork City Development Plan 2022-2028

The Draft Cork City Development Plan 2022 (Draft CDP) outlines objectives and parameters for housing development in the City up to the year 2028 and beyond. The Draft CDP is underpinned by a number of key principles which include sustainability, social inclusion, high quality design and climate change adaptation. Chapter 2 of the Plan outlines the Core Strategy for the County over the lifetime of the Plan. The strategy identifies a hierarchy in the network of settlements and divides the city into different strategic areas to focus growth in appropriate locations and ensure a sustainable, plan-led future for Cork

Policy

The subject site is subject to several zoning/development objectives in the CDP.

Consistency

See below.



ZO 01 – ‘Sustainable Residential Neighbourhoods’

‘To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.’

ZO 05 – ‘Mixed Use Development’

‘To provide and promote a mix of residential and other uses to ensure the creation of a vibrant and sustainable urban area.’

ZO 5.1 - This zoning objective facilitates the development of a dynamic mix of uses which will interact with each other creating a vibrant urban area with residential, employment and other uses. A vertical and horizontal mix of uses should occur where feasible, including active ground floor uses and a vibrant street frontage on principle streets.

ZO 5.2 - The range of permissible uses within this zone includes residential, general offices, local services, conference centre, education, hospital, hotel, commercial leisure, cultural uses, civic institutions, childcare services, local medical facilities, business and technology / research uses and community and civic uses. The range and scale of uses proposed must be commensurate to the scale of the zone.

Specific Objective 10.86 - ‘To provide for mixed use development on Jacob’s Island to accommodate the mix of uses set out under the ZO 5 Mixed Use Development Zoning Objective to include an hotel and up to 15,000 square metres of business and technology office use.’

Proposed Material Alteration 1.307 to the Draft Plan proposes to amend Objective 10.86 as follows - ‘To provide for mixed use development on Jacob’s Island to accommodate the mix of uses set out under the ZO 5 Mixed Use Development Zoning Objective to include an hotel and up to 15,000 20,000 square

The majority of the subject site is situated within the ZO 05 – ‘Mixed Use Development’ zoning objective. The proposed residential, creche and office uses are compatible with the proposed ZO 5 Objective for the lands and with a new floor area of 2,934 m² are significantly below both the proposed office threshold of 15,000m² and the Proposed Amended threshold of 20,000 m².

metres of business and technology office use.'

Population & Housing Targets

The subject site is situated within the 'City Suburbs' area in the Core Strategy Map of the 2022 CDP (Fig 2.20). Table 2.2 of the CDP aims to increase the population of the 'South East Suburb' of the City by 7,540 no. people by 2028 from 2016 figures. (14.6% increase)

Table 2.3 of the CDP identifies a potential residential yield of 3,028 no. additional units on Tier 1/2 lands to accommodate this population growth.

The site is identified as being within the 'Existing Built-Up Footprint' of the city in the Core Strategy of the CDP (Fig 2.22).

The proposed development will positively contribute towards the achievement of population and housing targets identified in the Core Strategy of the Draft CDP. The south-eastern suburbs of the city are to play a key role in the delivery of this growth.

In the 2016 Census the Cork Metropolitan Area recorded an average household size of just over 2.6 persons, which indicates that the proposed development can be expected to house c. 1,271 no. people, with enough bed spaces for c. 1,600 people.

The subject land's location within the 'Existing Built-Up Footprint' and ZO 05 Zoning further supports the appropriateness of the delivery of residential development at the site in the short-term to enable the city to meet its ambitious housing and population targets.

Objectives for City Growth - City Suburbs

Section 2.56 - Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.

Key Deliverables

1. Delivery of CMATS
2. Framework plans for Blackpool / Kilbarry, Ballyvolane, and Douglas.
3. Action plans for Neighbourhood Development Sites.
4. New City Parks in the Northeast and Northwest suburbs.

The proposed development is in accordance with the objectives for the City Suburbs in the Draft CDP. The proposed development will positively integrate with the surrounding area delivering much needed residential development at an underutilised zoned and central/accessible site

The proposed development is in accordance with CMATS and will promote accessibility and the enjoyment of the Passage West Greenway, the River Lee/Lough Mahon Waterfront Greenway and Mahon Estuary walkways, which are some of the city's most valuable assets.

Strategic Objectives for Growth SO 1: Compact Liveable Growth

"Deliver compact growth that achieves a sustainable 15-minute city of scale providing integrated communities and walkable neighbourhoods, dockland and brownfield regeneration, infill development and strategic greenfield expansion adjacent to the existing city."

The proposed development represents a higher density infill residential development which facilitates permeability and access to public transport, in accordance with the '15-minute city' concept identified in SO 1.

Objective 2.12 – Walkable Neighbourhoods

New development shall be designed to make positive additions to their neighbourhoods, towns and communities by:

- a) Delivering the right mix of uses at a scale and design that creates high quality buildings and spaces.
- b) Creating attractive, safe and vibrant places designed at a human scale (i.e. places that relate to people, streetscapes and local character) with active streets and avoiding creation of dead spaces.
- c) Ensuring a child friendly and age friendly environment applying Universal Design principles with a mix of household types. Designing a safe place that enables access for all.
- d) Designing a safe place that enables access for all.
- e) Creating a healthy neighbourhood with increased urban greening and direct access to high quality parks and public spaces, schools, shops and local services.
- f) Being well-connected with easy access to public transport and active travel.
- g) Providing enhanced permeability for walking and cycling.

Objective 2.15 - Neighbourhood Design

The design and siting of development shall create a sense of community and identity, enhance connectivity, incorporate creative approaches to urban design, enhance landscape character and green and blue infrastructure and respect the local context and character of the area.

Objective 2.18 - Underutilised Sites

Cork City Council will seek to address issues of dereliction, vacancy and underutilisation of sites within Cork City by encouraging and facilitating their re-use and regeneration subject to good planning and the infrastructural carrying capacities of the area.

Objective 2.26 - Housing Supply

Support an increase in the supply, affordability and quality of new housing in city and provide a range of housing options delivering good design that is appropriate to the character of the area in which it is built, while also achieving an efficient use of zoned and serviced land.

Strategic Objectives for Growth SO 2: Delivering Homes and Sustainable Communities

The proposed development is in accordance with guidance identified in Draft CDP Objectives 2.12 and 2.15. As described in the Architectural Design Statement prepared by O'Mahony Pike Architecture, the proposed development satisfies criteria in the Urban Design Manual and is within walking distance of multiple urban centres.

The proposed layout provides for multiple pedestrian access points and includes high quality amenity areas ensuring that future residents of all ages will have opportunities to avail of a high-quality urban environment within walking distance of the proposed dwellings and surrounding areas.

Draft CDP Objective 2.18 promotes the regeneration of existing underutilised sites in the city. The subject lands are underutilised and given their prime urban location their redevelopment is in accordance with the sustainable growth and development of the area. To leave the lands in their current use is an inefficient use of zone lands and unsustainable and not consistent with compact urban development, which is heavily promoted by the Draft CDP.

The proposed development will improve housing supply in the area and contribute positively to the housing market in this part of the city.

The proposed development is consistent with SO 2 through its appropriate use of density, which complements the sites' location within the evolving

'Provide densities that create liveable, integrated communities by using a mix of house types, tenures and sizes linked to active and public transport. Provide amenities, services and community and cultural uses to enable inclusive, diverse and culturally rich neighbourhoods'.

development context of the city's southside. The proposed development is primarily positioned to benefit from planned amenities and public transport improvements.

Objective 3.3 New Housing Supply

Provision will be made for at least 16,236 new homes to be built in Cork over the Development Plan period.

Objective 3.4 Compact Growth

Cork City Council will seek to ensure that at least 51.6% of all new homes will be provided on brownfield/infill development site. Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by:

- j) Combining its role as planning authority and housing authority to bring about residential development to meet demand and need;
- k) Where new sustainable transport infrastructure is planned land use designations will be reviewed and updated, where appropriate to provide for housing or mixed-use development (including housing);
- l) Unlock the development potential of brownfield sites to be used as an evidence base and business case for intervention; and
- m) Ensuring that all new housing developments contribute to the creation and / or maintenance of successful neighbourhoods.
- n) Identify and promote the development potential of brownfield, small sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets.

The proposed development of 489 no. residential units will positively contribute to the housing supply targets and help address the current housing shortage in the city.

The subject site is an underutilised infill site situated south of the N40 South Link Road, on the Mahon Peninsula, which is easily accessible on foot, bicycle or via car and public transport to amenities and services across the city. The proposed development of c. 138 units per hectare will contribute positively to achieving compact growth targets, while also reflecting the sites unique setting and characteristics.

Objective 3.5 Residential Density

Cork City Council will seek to:

- a) Promote compact urban growth by encouraging higher densities throughout Cork City according to the Cork City Density Strategy, Building Height and Tall Building Study and resultant standards set out in Chapter 11: Placemaking and Managing Development and Mapped Objectives; and
- b) Ensure that urban density is achieved by development proposals providing for high quality sustainable residential development, ensure a balance between the protection of the established character of the surrounding area and existing

The proposed density of c. 138 units per hectare is in excess of the maximum density set out in the Draft CDP 2022 for 'Inner Fringe, Corridor, Centre', specifically within the 'Mahon' sub-category, where Table 11.2 indicates a density target for this this area of between 50 (lower)-120 (upper) units her hectare.

In view of its central and accessible location, adjacent to the Mahon District Centre, an employment hub, and its proximity to public transport provision, which is set to be enhanced by the development of the LRT, the site is suitable for higher density development.

residential amenities;

c) Ensure that urban density is closely linked to creating successful neighbourhoods and ensuring that neighbourhoods are integrated and permeable to ensure short trips are possible to urban centres, local services and amenities.

This view is supported by the adjacent planning history where developments up to 25 storeys have recently been permitted (ABP Ref: APB-301991-18)

This matter is further addressed in the Material Contravention Statement prepared by HW Planning which accompanies this application.

Objective 3.6 Housing Mix

Cork City Council will seek to:

b) Encourage the development of an appropriate mix of dwelling types to meet target residential densities, utilising a range of dwelling types and density typologies informed by best practice (as illustrated in “Density Done Well” in the Cork City Density Strategy, Building Height and Tall Building Strategy) with combinations of houses, stacked units and apartments.

c) Within all new residential developments it will be necessary to ensure an appropriate balance of housing tenure and dwelling size to sustain balanced and inclusive communities, including a balance of family-sized units and smaller dwellings tailored to suit the location.

e) Encourage the provision of housing for one and two person households in all neighbourhoods to meet the needs of all age groups, including providing for downsizing to release family housing units.

The housing mix proposed provides for a variety of house types and sizes and is in accordance with guidance outlines in the Joint Housing Strategy and the Guidelines on Sustainable Residential Development in Urban Areas. However, in response to the traditional under-provision of smaller housing units in the Mahon neighbourhood, the housing mix has been designed to contribute towards rebalancing this by providing smaller housing units.

This is discussed further in the Statement on Housing Mix and the Statement on Material Contravention which have been prepared by HW Planning and accompany this application.

Objective 3.21 Childcare Facilities

To support the provision and expansion of high-quality childcare facilities throughout the city. The Council will:

a) Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered.

b) Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed.

As detailed in the Childcare Needs Assessment prepared by HW Planning, in view of the housing mix and the existing and permitted childcare provision in the vicinity, the proposed creche which is located towards the centre of the site will be sufficient to cater for childcare needs generated from the development.

Cork City Childcare Committee have been contacted in advance of this application and are a statutory consultee as advised in the ABP Opinion.

Strategic Objectives for Growth SO 3: Transport and Mobility

Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and

The site's sustainable central/accessible location, proximate to significant employment and service centres in the south-eastern suburbs, and its excellent pedestrian/cyclist and public transport links to Mahon and the city centre will result in the future residential development of the lands being compatible with SO3. The future public transport,

smart mobility, accessible for all.

walking and cycling upgrades in the area identified in CMATS will further enhance sustainable mobility in the area with the proposed development being located in an ideal position to benefit from these improvements.

Objective 4.1 CMATS

Cork City Council will work in cooperation with the NTA, TII and Cork County Council to fully implement the Cork Metropolitan Area Transport Strategy subject to detailed engineering design and environmental considerations, including the projects and programmes in relation to walking, cycling, public transport, BusConnects, suburban rail, light rail, park and rides and roads infrastructure, including the Northern Distributor Road and Southern Distributor Link Road.

As referenced above the proposed development is compatible with future connectivity improvements in the area identified in CMATs and subsequently, Draft BusConnects. The proposed development fits appropriately into the evolving context of the area.

Objective 4.3 Strategic Location of New Development

To ensure that all new residential, employment and commercial development are focused in areas with good access to the planned high frequency public transport network.

In accordance with Objective 4.3, the proposed development is in an area already served by excellent public transport services which will be further enhanced through the implementation of CMATS.

Objective 4.5 Permeability

- a) All new development, particularly alongside the possible routes identified for public transport improvements, shall include permeability for pedestrians, cyclists, and public transport so as to maximise its accessibility.
- b) To maximise permeability, safety, security and connectivity for pedestrians and cyclists by creating direct links to adjacent roads and public transport networks in accordance with the provisions of statutory guidance as prescribed.
- c) Prepare a permeability strategy for areas throughout the city.

The proposed development typifies a permeable development with several public access points being provided throughout the development which link with Jacob's Island/Longshore Avenue to the south and to the Passage West Greenway and the River Lee/Lough Mahon Waterfront Greenway to the east and south. The proposed pedestrian/cycle routes through the site have been designed to reflect and enhance upon the informal pedestrian desire lines that currently traverses the site, which local residents use as short-cuts between Mahon District Centre and the Joe McHugh Park. These desire lines have been fundamental to the evolution of the scheme. They have been enhanced upon with a series of linked green areas and made more secure by active street frontage and passive surveillance along the routes.

Strategic Objectives for Growth SO 4: Climate and Environment

'Transition to a low-carbon, climate-resilient and environmentally sustainable future. Implement climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigation and adaptation.'

The proposed development promotes sustainable commuting patterns with walking and public transport being viable and attractive modes of transport for future residents. Given the sites location proximate to excellent public transport services and being within walking distance of a district centre, the proposed development will have employment and service offering, and it is likely that future residents of the development will choose to walk and cycle to work,

Strategic Objectives for Growth SO 5: Green & Blue Infrastructure, Open Space and Biodiversity

Manage and enhance green and blue infrastructure to protect and promote biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character and maritime heritage, and manage access to green and blue spaces that provide recreation, amenity and natural areas.

Objective 6.9 Landscape

- a) To preserve and enhance Cork’s landscape character, key landscape assets and views and prospects of special amenity value.
- b) Landscape will be an important factor in all development proposals, ensuring that a proactive view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability.
- c) To ensure that new development meets the highest standards of placemaking, siting and design.
- d) To protect those prominent open hilltops, valley sides and ridges that define the character of the Cork City Hinterland and those areas which form strategic, largely undeveloped gaps between the main Hinterland settlements from development.

Objective 6.11 Landscape and Development

To ensure that the management of development throughout Cork City will have regard for the value of the landscape, its character, distinctiveness and sensitivity in order to minimize the visual and environmental impact of development, particularly in designated areas of high landscape value where higher development standards (layout, design, landscaping, materials) are required.

which in turn will help realise Strategic Objective 4 of the City Plan.

The enclosed Landscape Design Report prepared by Doyle and O’Troithigh Landscape Architecture explores the landscape design within the development and outlines its rationale.

The strategy has successfully connected the proposed development with the wider Lee to Sea pathway (Passage West Greenway) and Joe McHugh Park to the south of the site. Other achievements of the strategy are:

- The creation of an accessible, central open space within the development;
- The development of communal amenity areas which cater for passive and active recreation for all abilities and age groups; and
- The creation of ‘green streets’ and strong landscape buffer areas between public and private areas.

As noted above, the accompanying Landscape Design Report and drawings and Architectural Design Statement explore the design rationale for the proposed development, which both confirm and ensure that the proposed development will form a positive contribution to its receiving environment.

Objective 6.18 Public Open Space

a) To protect, retain, improve and provide for areas of public open space for recreation and amenity purposes. There will be a presumption against development of land zoned Public Open Space for alternative purposes.

b) There will be presumption against development on all open space in residential estates in the city, including any green area/public amenity area that formed part of an executed planning permission for development and was identified for the purposes of recreation /amenity open space, and also including land which has been habitually used as public open space. Such lands shall be protected for recreation, open space and amenity purposes.

c) The development of open spaces should aim to enhance and protect natural features and views and be set in safe and secure environments with the emphasis on active open spaces accessible to and enjoyed by all sectors of the community including good practices of inclusive design.

d) To follow an approach of qualitative as well as quantitative standards for open spaces providing high quality open spaces with high levels of access to recreation for local communities.

e) Specific design outcomes should be framed in relation to the nature of spaces being created or enhanced (e.g. in relation to maintenance, nature exposure and connectivity, strategic landscape and social role).

f) Support measures to green the city, including re-grassing of appropriate hard-surfaced areas in locations throughout the City.

As detailed in the enclosed Landscape Design Report and plans prepared by Doyle and O'Troithigh Landscape Architecture, public open space areas within the residential component of the development are accessible to all residents.

Objective 9.2 Wastewater

a) To require all new proposals for development to provide a separate foul and surface water drainage system and to incorporate Sustainable Urban Drainage Systems in so far as practical.

b) As part of new proposals for development, evidence of consultation with Irish Water should be submitted as part of a planning application, demonstrating that adequate water services are available to service the development and that existing water services will not be negatively impacted.

Objective 9.4 Sustainable Urban Drainage Systems

a) To require that all planning applications for new development incorporate Sustainable Urban Drainage Systems (SUDS) in so far as possible. Such proposals shall be accompanied by a comprehensive SUDS assessment including run-off quantity,

As detailed in the enclosed engineering details prepared by MMOS Consulting Engineers, separate foul and surface water drainage systems are proposed as part of the proposed development.

A Confirmation of Feasibility and a Statement of Design Acceptance from Irish Water are also provided in the Engineering Report prepared by MMOS Consulting Engineers.

As described in the enclosed engineering documentation prepared by MMOS Consulting Engineers the proposed drainage strategy has sought to maximise natural drainage systems in preference over manmade solutions such as attenuation tanks. The proposed drainage strategy incorporated SUDS by way of swales and other methods in accordance

run off quality and impacts on habitat and water quality.

b) To encourage the provision of green roofs and green walls as an integrated part of Sustainable Urban Drainage Systems (SUDS) and which provide benefits for biodiversity, wherever feasible.

c) To investigate the feasibility of preparing Sustainable Urban Drainage Systems (SUDS) guidelines for Cork City during the lifetime of the plan. In the interim The Department of Housing, Local Government and Heritage document: Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design - Best Practice Interim Guidance Document, will provide guidance in this regard.

with guidance outlined in 'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas' and 'Surface Water Runoff in Urban Areas and Planning for Watercourses in the Urban Environment' documents prepared by the Department of Housing, Local Government and Heritage and Inland Fisheries Ireland.

Strategic Objectives for Growth SO 9: Placemaking and Managing Development

Develop a compact liveable city based on attractive, diverse and accessible urban spaces and places. Focus on enhancing walkable neighbourhoods that promote healthy living, wellbeing and active lifestyles, where placemaking is at the heart. Follow a design-led approach with innovative architecture, landscape and urban design that respects the character of the city and neighbourhood.

The proposed development and layout will promote positive placemaking and a new sustainable neighbourhood in accordance with SO9. The proposed development represents an infill residential and office scheme which will create synergies with the existing nearby neighbouring employment and service centres and represents high quality urban design.

Sections 11.14 – 11.25 of the CDP refers to statements which should be submitted to support development proposals. These include,

- Design Statements
- Visual Impact Assessments
- Traffic and Transport Assessments
- Travel Plans
- Environmental Impact Assessment
- Appropriate Assessment
- Ecological Reports

In response the following documentation accompanies this application.

- Architectural Design Statement prepared by O'Mahony Pike Architects.
- Townscape and Visuals (Chapter 4 of accompanying EIAR) prepared by AECOM.
- Traffic and Transport Assessment (TTA) included as Appendix 5.1 in the accompanying EIAR, prepared by SWECO.
- Mobility Management Plan prepared by SWECO.
- An NIS with AA screening prepared by Atkins.
- An EIA Report has been prepared and accompanies this application.

Cityscape and Building Height

The subject site is situated within the 'Primary Urban Corridors & Principal Towns/ Fringe, Corridor, Centre' in the density and building height spatial strategy of the CDP (Fig 11.1 and Map 06).

Density Target.

The proposed development of 138 units per hectare is greater than the upper density target for Mahon identified in Table 11.2 of the CDP for the Mahon area. However, the proposed density is consistent with the prevailing high-density developments

Within the 'Fringe, Corridor, Centre' the site is included within the 'Mahon' sub-category.

Table 11.2 of the CDP refers to 'Cork City Density Building Height Standards'. Within areas identified as being within the 'Inner Fringe, Corridor, Centre - Mahon'.

- Density Target: 50 (lower)-120 (upper) units her hectare.
- Building Height Target – 4 (lower)- 6 (upper) storeys.

	DENSITY					HEIGHTS			
	FAR		Dwellings per hectare			No. of storeys			
	Prevailing	Target	Prevailing	Lower	Upper	Lower	Upper	Lower	Upper
FRINGE/CORRIDOR/CENTRE	1.0 - 3.5	2.5 - 4+	25 - 100+	50	150	2	6	4	7
City fringe / corridor	1.5 - 3.5	2.5 - 4.5	25 - 100	50	150	3	6	5	7
Mahon	0.5 - 3.5	1 - 4	10 - 40	50	120	2	5	4	6
Blackpool	0.5 - 3.0	1 - 4	0 - 40	50	120	2	5	4	6
Wilton	0.5 - 3.5	1 - 4	10 - 25	50	120	2	4	3	5

* Assuming resited scheme

permitted in the vicinity in recent years.

Building Density is further discussed in the enclosed Material Contravention Statement prepared by HW Planning.

Building Height Target

Table 11.2 of the CDP refers to an upper building height target of 6 storeys in the 'Fringe/Corridor/Centre - Mahon' area. The proposed development will see the construction of a part-1 to part-8 storey development.

The proposal will contribute directly to a positive increase in residential density in the area, whilst appropriately respecting the established built environment. The proposed development has a net density of 137.7 no units per ha. We note that the adjacent scheme recently permitted on Jacob's Island (ABP Ref: APB-301991-18) has a density of 137 no. units per hectare. The proposed density will support the consolidation of development along key transport corridors as set out in Cork Metropolitan Area Transport Strategy. This includes an east-west corridor from Mahon through the city centre to Ballincollig.

High density development is appropriate on lands adjacent to high frequency transport structure such as the current bus service and proposed LRT. Building Height is further addressed in the Material Contravention Statement prepared by HW Planning which accompanies this SHD application.

Objective 11.1 Sustainable Residential Development

Residential developments shall be sustainable and create high quality places which:

- Contribute to placemaking and to the 15- minute city and walkable neighbourhood concepts by planning for vibrant communities, with active streets, urban greening, versatile and creative use of spaces avoiding "dead" spaces.
- Prioritise walking, cycling and public transport, and minimise the need to use cars.
- Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience.
- Provide a good range of community and support facilities,

As detailed in the attached Architectural Design Statement prepared by O'Mahony Pike Architects and Section 3.4 of this Statement of Consistency, the proposed development is in accordance with the 'Urban Design Manual: A Best Practice Guide' regarding the provision of sustainable residential development.

The proposed mix of uses and apartment types will promote sustainable modes of travel, social interactions, and high-quality living. The proposed development is of an appropriate density, scale and form reflecting of the sites setting in the wider evolving urban context.

where and when they are needed and that are easily accessible.

e) Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained.

f) Are easy to access for all and to find one's way around with a focus on permeability within sites and integration and connectivity into the surrounding urban environment to enable short trips by walking and cycling.

g) Promote the efficient use of land and of energy and minimise greenhouse gas emissions.

h) Provide a mix of land uses to minimise transport demand.

i) Promote social integration and provide accommodation for a diverse range of household types and age groups.

j) Enhance and protect green and blue infrastructure and biodiversity.

K) Enhance and protect the built and natural heritage.

Objective 11.2 Dwelling Size Mix

'All planning applications for residential developments or mixed-use developments comprising more than 50 dwellings will be required to comply with the target dwelling size mix specified in Tables 11.3-11.9, apart from in exceptional circumstances. Where a clear justification can be provided on the basis of market evidence that demand / need for a specific dwelling size is lower than the target then flexibility will be provided according to the ranges specified.'

Of tables 11.3- 11.9 it is considered that only table 11.8 '*City Suburbs Dwelling Size Mix for Housing Developments*' relates to the proposed development.

	Min	Max	Target
Studios / PBSA (at LRT Stops / Urban Centre / HEI Campus Only)	0%	15%	10%
1 Bedroom	15%	25%	20%
2 Bedroom	25%	40%	34%
3 Bedroom	18%	38%	28%
4 Bedroom / Larger	5%	15%	8%

Objective 11.4 Daylight Sunlight and Overshadowing (DSO)

All habitable rooms within new residential units shall have access to appropriate levels of natural / daylight and ventilation. Planning applications should be supported by a daylight and sunlight design strategy that sets out design objectives for the scheme itself and its context that should be included in the Design Statement.

The potential impacts of the proposed development on the

The proposed development of 489 no. residential units provides for the following breakdown of residential accommodation.

- 327 no. are 2 bed units = 66.9%
- 161 no. are 1 bed units = 32.9%
- 1 no. are studio units = 0.2%

Housing mix is addressed in the accompanying Housing Mix Statement prepared by HW Planning. This matter is further addressed in the Material Contravention Statement prepared by HW Planning which accompanies this SHD application.

The Sunlight and Daylight Access Analysis Report prepared by Arc Architectural Consultancy (ref Appendix 13-2 of the accompanying EIAR) addresses Daylight, Sunlight and Overshadowing matters referred to in Objective 11.4.

amenities enjoyed by adjoining properties will need to be assessed in relation to all major schemes and where separation distances are reduced below those stipulated. Cumulative impacts of committed schemes will also need to be assessed. Daylight, Sunlight and Overshadowing (DSO) assessment, utilising best practice tools, should be scoped and agreed with the Planning Authority prior to application and should take into account the amenities of the proposed development, its relevant context, planning commitments, and in major development areas the likely impact on adjacent sites.

Objective 11.5 Private Amenity Space for Houses

Houses should provide a private garden / terrace, of adequate size and proportions for the size of house proposed. The private outdoor areas should allow space for outside dining and / or clothes drying, with reasonable circulation. Private open space for houses should aim to be at least 48 sqm. However, it may be acceptable to provide a smaller area where it can be demonstrated that good quality, useable open space can be provided on site.

All dwelling houses have sufficient private amenity areas as detailed in the Housing Quality Assessment prepared by O'Mahony Pike Architects.

Public Open Space in Housing Developments

Area	Public Open Space Provision
Greenfield Sites / Areas for which a local area plan is appropriate	15%
General Provision	10%

Table 11.11: Residential Public Open Space Provision.

The proposed development provides for 12.3% public open space, in accordance with Table 11.11.

Car and Bicycle Parking

Paragraph 11.232 of the CDP refers that '*Car parking standards for both residential and non-residential developments are set out in Table 11.13. These standards are maximums in order to constrain car trip generation and promote patronage of active travel and public transport.*'

The subject site is situated within 'Car Parking Zone 2' of the CDP. Table 11.3 identifies the maximum car parking standards in these Zone 2 areas.

- 1/2 bedroom units – 1 space.
- Creche – 1 per 6 students.
- Offices, Enterprise and Employment – 1 per 150 sq m

Table 11.14 of the CDP refers to Bicycle Parking Standards.

- 1 per residential unit in Inner Urban Areas.
- Creche – 1 per 25 children
- General Offices – 1 per 150 sq. m.

A breakdown of car and bicycle parking provided within the development, in comparison with the Draft CDP standards is included in the table below.

Car Parking Standards are further addressed in the Material Contravention Statement prepared by HW Planning which accompanies this SHD application.

Land Use	Car Parking Spaces Provided (Max. Required Spaces)	Bicycle Parking Spaces Provided (Required Spaces)	
		Resident	Visitor
Residential	246 (489)	816 (816)	245 (244.5)
Creche (48 place creche)	6 (8)	4 (3)	-
Office (4,112 m ² (Gross))	69 (27.41)	80 (27)	-
Car Club Spaces	6 (-)	-	-
Total	327	1,145	

05.4 Mahon Local Area Plan, 2014 (Lapsed)

Although the Mahon Local Area Plan has expired and is largely outdated it has been included as part of this Statement of Consistency for completeness. The vision of the Mahon Local Area Plan was to transform the area into a cohesive, connected and well serviced neighbourhood and employment area. Among the key objectives of relevance to the proposed development are the following:

- To encourage a diverse and appropriate range of uses to meet the needs of Mahon as a place to live, work and visit;
- To promote a high standard of urban design with a clear sense of place and architectural quality, and to improve the structure and character of Mahon's urban form through appropriate land use zoning and guidance on typology, density, and built form and by promoting excellence in the design of buildings and spaces;
- To ensure a range of high-quality new homes to promote choice and achieve a social mix;
- The consolidation of development to address severance and lack of connectivity between uses and areas;
- To maximise the contribution of sustainable travel modes in meeting travel demand, including improved public transport services, demand management measures, and

ensuring the provision of a comprehensive local and strategic walking and cycling network; and

- To conserve and enhance Mahon's natural heritage and built heritage assets, including Bessboro House and parkland and the Natura 2000 habitats at Douglas Estuary and Lough Mahon.

Furthermore, Figure 4.8 of the LAP identifies the land use objectives for the Jacob's Island precinct. The LAP identifies the subject site as a 'Development Opportunity', with key frontage onto the internal spine road. A noise pollution buffer is indicated to the north of the application site and a 'Corner Focal Building' is identified to the north-west within the Masterplan lands.



Figure 05.1 Extract from the Mahon Local Area Plan, 2014

The key policy objectives pertaining to the subject lands are outlined below:

Policy	Consistency
<p>Objective P01: High Quality Development Improve the quality of life of people through the provision of high quality residential, employment and other development.</p>	<p>The proposed development will provide a high-quality mixed-use development with strong connectivity to existing green infrastructure, most notably the Passage Greenway to the west.</p>

Objective P02: Recreational and Green Infrastructure
 Ensure the provision of recreational and green infrastructure to meet people's needs and maximise opportunities to link the spaces and to seek Bessboro House Park as a neighbourhood park to meet the needs of the Mahon Neighbourhood.

The proposed landscape strategy has sought to provide valuable pedestrian and cycle connections from the subject lands to existing infrastructure on Jacob's Island.

Objective T01: Smarter Travel Targets
 To require all future non-residential development in Mahon to aim to achieve a transport mode split of 45% private car trips and 55% non-private car trips, or better.

The proposed development has been designed having regard to the concepts of smarter travel. The proposed development will provide a reduced quantum of car parking for the residential units (0.5 car parking ratio) and commercial development (75 no. car parking spaces which represents a parking ratio of 0.84 car parking spaces per 50 sq m of office space which will encourage a modal shift towards using public transport, walking and cycling as the primary mode of travel from Jacob's Island.

Objective T04: Walking and Cycling
 Improve pedestrian and cycle access, permeability, safety and priority throughout Mahon to encourage shorter trips by non-car modes and the creation of attractive streets. The routes are set out in Table 3.5.

Objective T04: Potential Public Transport Measures
 Enhance the bus network to enable the bus-based transport system to achieve a greater share of journeys by improving bus infrastructure, bus services and measures to improve pedestrian and cycle connectivity to the bus stops on bus routes.

As detailed previously in this document, the planned bus connects improvements and development of the LRT underpins the development of a high density scheme on the subject lands.

Objective UD1: Creating a Legible Mahon
 It is the policy of the Council to make Mahon an attractive and successful place by creating a legible and coherent spatial pattern of development, reinforcing and enhancing the existing urban structure.

We submit that the proposed development will deliver an efficient, high quality and contemporary development for future residents of the scheme. As previously noted, the development of the subject lands in combination with the existing and permitted developments on Jacob's Island will act as a catalyst for the delivery of Mahon as a key gateway location in Cork.

Objective B03: Designated Sites
 Ensure that there will be no significant impact on Natura 2000 designated sites. All projects arising from this plan will be subject to the Habitats Directive Assessment Screening process.

The application is accompanied by an Natural Impact Statement and Appropriate Assessment Screening prepared by Atkins that considers the potential impacts of the development on this European Sites.

Noise Objectives
Objective N01: Ensure that new development is not adversely affected by unacceptable levels of noise pollution.
Objective N02: Seek to ameliorate the impact of unacceptable levels of noise pollution on existing areas.

The site is located immediately south of the N40 South Ring Road. A noise assessment has been carried out by AWN Consulting and is detailed within the Design Statement prepared by O'Mahony Pike Architects.