



## PLANNING REPORT AND STATEMENT OF CONSISTENCY

### PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) AT SARSFIELD ROAD, WILTON, CORK CITY

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**PREPARED FOR:**

**THE LAND DEVELOPMENT AGENCY**

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## 1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, No. 1 Horgan's Quay, Cork City, in association with Reddy Architecture + Urbanism<sup>1</sup>, is instructed by our Client, the Land Development Agency<sup>2</sup>, to submit this Planning Application for a Large Residential Development (LRD) to Cork City Council on the above referenced site.

The subject site is identified as a '*Sustainable Residential Neighbourhoods*', in the *Cork City Development Plan*. The aim of this zoning is to protect and provide residential amenity in Cork City. The subject site is located in Wilton, the Plan states this is an area for growth consolidation and enhancement. This highlights the appropriateness of accelerating and optimising the delivery of residential development on this site.

This report is structured as follows:

- *Section 1.0 – Introduction*
- *Section 2.0 – Description of the Proposal and Area Context*
- *Section 3.0 – Planning History*
- *Section 4.0 – Planning Policy Context;*
- *Section 5.0 – Supportive Documentation*
- *Section 6.0 – Summary of Enclosures*
- *Section 7.0 - Conclusion*

## 1.1 Project Team

This Planning Application has been prepared by Tom Phillips + Associates in conjunction with the following Consultants:

- Reddy Architecture + Urbanism (Architecture)
- Mitchell McDermott (Project Management)
- Park Hood Landscape Architects (Landscape Architecture and Visual Impact Assessment)
- John Cronin and Associates (Archaeology and Heritage)
- Barrett Mahony Consulting Engineers (Engineering and Civils)
- Malone O'Regan Environmental Consultants (Environmental and Appropriate Assessment)
- EDC Engineers (Mechanical and Electrical)
- O'Herlihy Access Consultancy (DAC)
- Redline Studios (Verified Views and CGIs)
- O'Dwyer and Jones Design Partnership (Aviation Planning)
- GIA Consulting (Daylight, Sunlight, Shadow and Microclimate)
- John Morris Arboricultural Consultancy (Arboricultural).

A suite of supportive subconsultants have also informed the above-mentioned design team members.

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<sup>1</sup> Reddy Architecture + Urbanism, Douglas Business Centre, Carrigaline Road, Douglas, Cork T12 P088

<sup>2</sup> The Land Development Agency, Ashford House, Tara St, Dublin 2, D02X67

## 1.2 Section 247 Pre Planning Meeting

A Section 247 Pre-Planning meeting was held between the Project Team and Cork City Council representatives in relation to the proposed development on 4<sup>th</sup> June 2024 via MS Teams, Ref. 53/24. The following items were discussed during the meeting, as noted in the agenda issued by Cork City Council –

- *“Layout / Heights / Placemaking / Density and Public Open Space;*
- *Roads/ Traffic/ Permeability and Connectivity / Sustainable and Active Travel / Future proofing development;*
- *Irish Water feedback / SuDS and Nature Based Solutions;*
- *Part V / Housing Mix and Location;*
- *Environment;*
- *Noise / Air Quality.”*

During the course of the meeting, representatives from Cork City Council noted the relevant sections of the *Development Plan* that the design team would have to have regard to in formulating the design of the scheme. In addition, relevant national guidance was noted.

The Design Team have had regard to the feedback received in full and have integrated this feedback into the proposed scheme. This is outlined further in this Report.

## 1.3 Section 32B LRD Meeting

A Section 32B LRD meeting was held between the Project Team and Cork City Council representatives in relation to the proposed development on the 27<sup>th</sup> of September 2024 via MS Teams. The following departments provided comments on the proposed development –

- Development Management;
- Architecture;
- Biodiversity;
- Traffic Regulation and Safety.

Throughout the course of the meeting, the Local Authority stated they are supportive of a high-density development at the subject site. In addition, the Local Authority stated there were several aspects of the proposed development that may need further attention. These are listed as follows; permeability through the site, the north-facing sing-aspect units, increased interaction with the Sarsfield Road, the proposed childcare facility, and bicycle parking.

The Design Team have had regard to the feedback received in full and has integrated this feedback into the proposed scheme. This is outlined further through the entirety of the planning application.

Cork City Council issued an LRD Opinion on the 25<sup>th</sup> of October 2024. The Council’s Opinion is discussed in detail in the *‘Response to LRD Opinion’*, which is enclosed with this planning application accordingly.

The treatment along the southern boundary of the site has been designed in consultation with ESB Networks, the previous owners of the subject site, and the owner of the adjoining lands to the south. The design of this has been amended following detailed discussions with ESB subsequent to the S32B meeting with Cork City Council. The proposed 2.6m high masonry wall is a requirement of ESB Networks and therefore has been incorporated as part of the proposed development

## **2.0 DESCRIPTION OF THE PROPOSAL**

### **2.1 Subject Site**

The subject site, which is a largely undeveloped green field, adjoins the ESB Networks DAC complex at Farrandahadore More, on the Sarsfield Road, Wilton in Cork City. The site forms part of the wider ESB complex, which includes offices and warehouses to the immediate south of the green field. The site is, for the most part, undeveloped, however there have been a number of minor works previously carried out on site. These are;

- Provision of a now disused underground tank to the east of the site;
- Utilities and services within site;
- Boundary treatments, including a gate to Sarsfield Road on the eastern boundary;
- A partially constructed pedestrian path to the east of the site.

Immediately adjoining the site to the southwest are a number of telegraph poles, utilised for training purposes by the ESB. The red line boundary of the proposed development also includes the existing main entrance to the ESB complex, which is to be reconfigured to enable the proposed development, while maintaining security to the ESB site. The site has been largely maintained by the ESB and we note several large trees remain in situ across the site and to the boundaries.

### **2.2 Wider Environment of the Subject Site**

Wilton is a well-established suburban neighbourhood of Cork City and the subject site is c. 3.1 km from the City Centre. The site is located south of both the southern car parks of Wilton Shopping Centre and the SMA Wilton Parish Centre, with access from Sarsfield Road to the east. The land is situated in an area that is primarily residential and commercial. Sarsfield Road (R641) runs along the eastern boundary of the site, while the Cardinal Court residential estate borders it to the west, and the ESB Networks complex lies to the south.

Further to the south is the Cork South Ring Road (N40) and the Sarsfield Road Roundabout. Approximately 450 meters to the northeast is the Wilton Road Roundabout, providing access to Cork University Hospital (CUH). The area to the east and west of the site is predominantly residential.





**Figure 2.0: Indicative site location outlined in red [Source: Google Maps, annotated by TPA 2025]**



**Figure 2.1: View of the south-east corner of the site from the Sarsfield Road (R641). [Source: Google Maps, cropped and annotated by TPA 2025].**



**Figure 2.2: Wider Context Location Map. Subject site is indicated by red outline. [Source: Bing Maps, cropped and annotated by TPA 2025].**

Approximately 500 meters north of the site is Cork University Hospital (CUH) Campus, including Cork University Maternity Hospital. Further north, there are several housing estates, including Wilton Gardens and Laburnum Lawn, which consist of detached and semi-detached houses. To the east of the site, the area is primarily composed of low-density housing estates, though there are some amenities and essential services nearby. For example, St. Finbarr's Hurling and Football Club, with its associated playing fields, is c. 650 meters to the east. Clahsduv Park, featuring a large green space, playground, and tennis court, is located approximately 800 meters away to the north-east.

To the south, c. 600 meters from the site, is the Doughcloyne Industrial Estate, home to businesses such as Carey Tools and Caltech Electrical Supplies Limited. further south, c. 1.2km from the site, are a number of low-density detached and semi-detached housing estates, such as Eagle Valley and Sarsfield Heights.

### 2.3 Summary of Proposed Development

The Land Development Agency intends to apply for planning permission for the development of 348 no. residential units, consisting of a range of townhouses and apartments with associated open spaces and play areas. The proposed development will also comprise of the necessary site infrastructure, and services to facilitate the construction, operation and occupation of the development. This includes the proposed pedestrian, cycle, and vehicle access routes to the east, south, and west of the site.





**Figure 2.3: Site Layout Plan – Ground Level [Source: Site Layout Plan (Drawing Ref: WLT-06-SW-ZZ-DR-RAU-A-1003 Reddy Architecture + Urbanism 2025)]**

The scheme consists of a variety of unit types to meet the needs of a wide range of households. The proposed development is comprised of the following;

- 1 Bed 2P – 152 no. units;
- 2 Bed 3P – 48 no. units;
- 2 Bed 4P – 120 no. units;
- 3 Bed 5P – 12 no. units;
- 3 Bed Townhouse – 16 no. units.

As we are proposing more than 75 no. residential units, a childcare facility is to be provided as a part of the proposed development. The childcare facility (c. 156 Sqm) is to accommodate 52 no. children, with 2 no. informal play areas and is supported by a kitchen/staff room, an office, storage, and bathrooms. The proposed development will also include landscaping, public and private open spaces, and increased permeability throughout the site.

The proposed development also includes 148 no. car parking spaces (0.43 Car Space/ Dwelling Ratio). The proposed cycle parking provision consists of 503 no. bicycle parking spaces 1.45 Bicycle Space/Dwelling Ratio). Please refer to the Architectural Pack prepared by Reddy's Architecture and Urbanism for further information.

## 2.4 Proposed Development Description

The description of the proposed development is outlined below are per the Statutory Notices;

*“The Land Development Agency (LDA) intends to apply to Cork City Council for a 7-year Planning Permission for a Large-Scale Residential Development (LRD) at this site, with a total application site area of c. 2.61 ha, on undeveloped lands adjoining the ESB Networks DAC Office, at Farrandahadore More, Sarsfield Road, Wilton, Cork City. The development will provide 348 no. residential units, including 296 no. cost rental apartments, 16 no. 2 no. storey affordable for sale townhouses and 36 no. social housing apartments, and a c. 156 sq m childcare facility, with associated staff and servicing areas and all associated development. The site is bounded to the south by the ESB Wilton Offices and Depot, to the east by the Sarsfield Road, to the west by Cardinal Court and to the north by the St. Joseph’s SMA Wilton Parish Centre.*

*The development, with a total gross floor area of approximately c. 30,494 sq m, will consist of 16 no. 2 no. storey, 3-bedroom townhouses and 332 no. apartment units (152 no. 1-bedroom apartments, 168 no. 2-bedroom apartments, 12 no. 3-bedroom apartments) arranged in 3 no. Apartment blocks. The easternmost block is 6 no. storeys in height (c. 5,912 sq m). The central block (c. 11,790 sq m) ranges in height from 5-6 no. storeys, including parking at ground floor podium level, with the c. 156 sq m childcare facility also provided at ground floor level. The westernmost block (c. 10,969 sq m) is proposed to range from 5 - 6 no. storeys in height, including parking at ground floor podium level. The proposed development also provides public (c. 3,545 sq m) and communal (c. 1,487 sq m) open space, including provision of podium gardens in the central and western apartment blocks. Provision is made in the landscaping proposals for potential future pedestrian connections that would facilitate permeability through the site to adjoining lands to the western boundary, subject to agreement with those parties and/or Cork City Council, as appropriate.*

*The proposed vehicular, cycle and pedestrian access into the development is via a reconfigured shared access with the ESB facility to the southeast, via a controlled junction on Sarsfield Road. This reconfiguration includes changes to the existing boundary treatments and gates to the ESB site, relocation of security barriers and an existing prefabricated security kiosk (c. 9 sq m) within the ESB site. The existing gated vehicular entrance to the site on the eastern boundary to Sarsfield Road will be reconfigured to provide cycle and pedestrian only access. Pedestrian access is also to be provided to the north-eastern and south-eastern boundaries via Sarsfield Road. In addition, the proposed development includes bin stores; 148 no. car parking spaces; 503 no. bicycle parking spaces including 3 no. covered shelters; internal roads and pathways; hard and soft landscaping; outdoor play areas; plant; boundary treatments including retaining walls along the northern boundary; the repair and replacement of some existing boundary treatments; gates; signage; the provision of new drainage and watermain infrastructure and any required pipe diversion works; SUDS measures including green roof provision; below-ground attenuation structures; the decommissioning of an existing underground tank to the east of the site; changes in level; services provision and related ducting and cabling; electric vehicle charging points; 3 no. ESB substations; generator compound; photovoltaic panels; public realm works including lighting and all site development and excavation works above and below ground.”*

It is intended that these units will substantially be cost rental, which is a new housing tenure that was created under the *Affordable Housing Act 2021*. It offers a long-term, secure rental option that will contribute to the development of a sustainable housing market in Ireland, which provides choice across all tenures. The rent on these units is based on the cost of building, managing, and maintaining the homes. In addition, affordable purchase and social housing units are also provided within the proposed scheme.

As stated in the statutory notices the Applicant is requesting a 7-year permission. In this instance, we submit to the Local Authority that a 7-year planning permission is necessary to accommodate the scale and complexity of the large residential development. This is to ensure sufficient time for construction, infrastructure installation, and compliance with regulatory requirements while addressing potential unforeseen delays which may occur subsequent to obtaining planning permission.

The proposed development is outlined in greater detail overleaf. Refer also to the *Architectural Design Statement* prepared by Reddy A+U for further details of the scheme.



Figure 2.4: An internal view of the site, taken from the southeastern boundary and facing west. [Source: TPA 2025].



Figure 2.5: An internal view of the site, taken from the western boundary and facing east. [Source: TPA 2025].

### 3.0 PLANNING HISTORY

#### 3.1 Planning History of the Subject Site

The planning history for the site was accessed through the Cork City Council Planning Application Portal. Based on our review of the planning application files available on the CCC Planning Application Portal<sup>3</sup>, there are currently no active planning applications pertaining to the subject site. The online search identified there are 4 no. planning applications during the years 2004-2008 pertaining to the wider subject site and ESB grounds. These are outlined in further detail below.

**Table 3.0 Full planning history pertaining to the subject site. [Source: Cork City Online Planning Application Portal]**

Application CCC Reg. Ref.	Applicant	Development Proposal Summary	Decision
Reg. Ref. 0832755	Beacon Medical (SPV3) Limited	The provision of a temporary car park comprising c. 390 no. car parking spaces for a period of c. 27 months, the provision of a bus shelter, security barriers, lighting, changes in level, associated signage, all ancillary works and all other necessary site development and excavation works above and below ground. Access to the proposed development will be provided via an existing access point, off Sarsfield Rd., which will be widened/improved to provide vehicular access	Grant permission on the 06/03/2008 subject to 8 no. planning conditions
Reg. Ref. 0529480	ESB Shared Services	The demolition of the existing security hut and associated security gates and pillars at the entrances to the offices on Sarsfield Road and the construction of a new security hut and gates approximately c. 20m to the west of its present location. The development also includes the erection of traffic signals at the existing entrance on Sarsfield Road, the installation of a new security fence at the entrance and all associated site works	Grant permission on the 20/06/2005 subject to 5 no. planning conditions
Reg. Ref. 0529614	ESB Shared Services	A development which will consist of (1) the demolition of the existing pyramid type roof light structure and the construction of a replacement flat roof incorporating 5 no. individual coxdome pyramid type rooflights and an extension to the south wall of existing louvered plant room on roof and all associated site works	Grant permission on the 20/06/2005 subject to 1 no. planning condition
Reg. Ref. 0428203	Electricity Supply Board	Alterations to existing Group Building to include subdividing and changing of use from storage / workshop rooms to offices and replacing some external doors with windows	Grant permission on the 13/05/2004 subject to 4 no. planning conditions

<sup>3</sup> We have only reviewed the planning records available on Cork City Council's online portal and have not inspected the physical records or files held by the Council. It is likely that older files, potentially held in the Council's archives, may pertain to the establishment of the ESB complex and associated works. However, due to the passage of time and the perceived lack of relevance, we did not consider it necessary to examine these records at this stage.



### 3.2 Relevant Planning History in Local Area

A review of the planning applications for previous 5 no. years for the lands immediately adjoining the site, as well as the wider Wilton and Bishopstown area was undertaken. Minor alteration applications to the Wilton Shopping Centre and minor residential applications have been omitted from this exercise, rather a focus on larger applications has been adopted. This was used to inform the design team in relation to permitted patterns of development and planning precedent near the site. These are outlined in greater detail below.

**Table 3.1 Planning History of Surrounding Lands. [Source: Cork City Planning Application Portal]**

Application Reg. Ref.	Applicant	Address	Development Proposal Summary	Decision
Reg. Ref. 2140633	Lidl Ireland GMBH	Lidl Store In Wilton, Bishopstown Road, Glasheen, Cork	Permission to erect 743.00sqm or 150/30 kW of photovoltaic panels on the roof of our existing Lidl Store Wilton with all associated site works	Grant permission on the 13/01/2022 subject to 1 no. planning permission
Reg. Ref. 2039184	Bishopstown Community Association Company Limited by guarantee	Wilton Park House, Wilton, Cork	Permission for retention of existing pre-fabricated structures on site, currently used to accommodate existing community services/groups including Pre-School and Naionra (a sessional childcare facility) with enclosed outdoor play area, located within the curtilage of a Protected Structure i.e Wilton Park House	Grant permission on the 18/08/2020 subject to 4 no. planning conditions
ABP Reg. Ref. TA28.31010 5	Bellmount Development Limited	Kellehers Auto Centre, Wilton Road, Victoria Cross, Bishopstown, Co. Cork.	Demolition of existing structures. construction of 243 no. student bedspaces (ranging in height from 5-10 storeys) and associated site works.	Grant permission on 30/04/2021 subject to 21 no. planning conditions

Reg. Ref. 1837794	Montlake QIAF Platform IC York Property Fund II	Wilton Shopping Centre, located to the south of Bishopstown Road, to the East of Cardinal Way, and to the west of Sarsfield Road at Wilton	Permission for a mixed use development at Wilton Shopping Centre on a site of 4.82 Ha which is located to the south of Bishopstown Road, to the east of Cardinal way and to the west of Sarsfield Road at Wilton, Cork City. The proposed development consists of the partial demolition of the existing shopping centre [including the Pennys anchor store located at No. 56 Homefront] located to the northern end of the existing shopping centre comprising an area of 4,222m <sup>2</sup> and the removal of 420 no. surface car parking spaces. The proposed development also consists of the construction of an extension to the existing shopping centre ranging in height from two to seven stories. The proposed extension consists of: Retail and retail services [including cafe/restaurant uses] over three levels comprising 21,223m <sup>2</sup> GFA, a 14 no. screen [1.550 seats], cinema comprising 4,165m <sup>2</sup> GFA, offices comprising 4,398m <sup>2</sup> GFA, a 190 no. bedroom hotel comprising 9,335m <sup>2</sup> GFA, a public plaza and outdoor seating area, a multi storey car park with 6 levels providing 874 no. spaces, a surface car park on the roof of the second storey which is accessed from the multi storey car park providing 257 no. spaces and the replacement of 178 no. surface car parking spaces as well as 227 no. bike parking spaces and 70 no. motorbike parking spaces. Also proposed is a new vehicular entrance/egress from Sarsfield Road, as well as the relocation of the existing pedestrian crossing further north on Sarsfield Road. In addition, including food court seating, toilets, shared cores, general circulation areas and corridors. The total gross area to be constructed of all levels is 66,681m <sup>2</sup>	Third Party Appeal lodged on the 17/10/2018, ABP granted a 10-year permission on 21/05/2019, subject to 22 no. planning conditions.
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The table above outlines the nearby general planning history and also larger residential developments. As assessment of the adjoining Wilton Shopping Centre redevelopment is outlined briefly below and overleaf.

### 3.2.1 Wilton Shopping Centre Redevelopment

As noted above, the development allowed for the partial demolition of the shopping centre, to facilitate a large redevelopment and expansion. This included a 2–7 no. storey extension, with retail, office, cinema, and hotel uses proposed.

On the 28<sup>th</sup> of February 2018, Cork City Council received the planning application Reg. Ref. 18/37794, pertaining to the redevelopment of the Wilton Shopping Centre. Cork City Council issued their decision on the 23<sup>rd</sup> of August 2018 to grant the proposed development, subject to 44 no. planning conditions.

The planning application was subsequently appealed (ABP-302596-18) by several third parties on the 17<sup>th</sup> of October 2018. The Board issued a 10 -year grant permission on the 21<sup>st</sup> of May 2019, subject to 22 no. planning conditions.



**Figure 3.0: Extract of Site Layout Plan Drawing, prepared by Henry J Lyons Architects. The subject site is indicatively indicated with a red star [Cropped and Annotated by TPA, 2025]**

An Bord Pleanála assessed these items and deemed that these concerns may be suitably addressed through compliance submissions and 22 no. conditions were ultimately applied to the Grant of Planning Permission issued by the Board. We note that Cork City Council and the Board deemed a development comprising of 7 no. storeys to be acceptable at this location and in keeping with the sustainable development of the Wilton area, further stating a development of this mass and scale would not pose a negative impact on surrounding residents. The planning policy context relevant to the proposed development is discussed in detail below and overleaf.

## 4.0 STATEMENT OF CONSISTENCY

This Statement includes a list of the various statutory and strategic policy documents considered as part of the proposed development and demonstrates the extent of consistency with national and regional planning policy framework, the relevant Section 28 Ministerial Guidelines and the pertinent *Development Plan*.

### 4.1 National and Regional Planning Context

#### 4.1.1 The National Planning Framework (Ireland 2040 – Our Plan) (2018)

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

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

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

A recurring theme in the Framework is the requirement to facilitate balanced development throughout all regions of Ireland, and particularly, to accommodate significant growth in Ireland's cities other than Dublin. Specifically, the NPF supports future growth of at least 50% for Cork to 2040.

The positioning of the cities of the Southern Region, including Cork, as '*significantly scaled, compact and attractive*' will encourage their growth as effective complements to the current primacy of Dublin.

The importance of '*addressing the long-term decline of [Cork] City's urban population*' is highlighted, with the provision of '*ambitious, largescale*' housing regeneration within the city's built-up area cited as being central to this goal. Under the heading of '*Compact Growth*', the NPF is:

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



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

National Policy Objective (NPO) 3b imposes a target of at least 50% of future urban development on infill/brownfield development sites within the built envelope of existing urban areas, including Cork City. This is applicable to all scales of settlement, from the largest city to the smallest village. The NPF further notes in National Policy Objective 10:

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

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

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

#### 4.1.2 The Draft Revision of National Planning Framework (2024)

The *Draft Revision of the National Planning Framework* sets out an updated strategic development framework for the Country to 2040. The *Draft Revision* is the Government’s plan to cater to the expected additional one million people living in Ireland, the increase of two-thirds of a million people working in Ireland, and the half a million extra homes needed in Ireland by 2040.

This Framework is revised and updated to build on the policies in place and reflect the changes that occurred in the past 6 no. years, since the previous NPF was published in 2018. The Framework is currently in its draft form and it retains the original focus on a more balanced distribution of growth across all of Ireland’s regions – emphasising the potential for regional growth to harness the attractiveness and assets of all regions and places.

Having taken into account the 2022 Census figures and the increased projected population, the *Draft Revision* also identifies a need for approximately 50,000 additional households per annum to 2040, an increase from the 30,000 per annum figure stated in the original NPF.

The *Draft Revision* of the NPF introduces 17 No. new national policy objectives (NPO) to the NPF. NPO21 of the *Draft Revision* of the NPF, which replaces NPO12 of the original NPF, states:

***“The Government will support the LDA, in association with Local Authorities, to fulfil its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority.”*** [Our Emphasis]

The *Draft Revision* outlines significant growth objections for Cork, focusing on ensuring balanced, connected, compact growth. There is an emphasis on ensuring future residential development and employment opportunities are located within existing urban centres.

The *Draft Revision* includes several NPF National Strategic Outcomes (NSO). These represent shared goals for multiple communities at a National Level. The proposed development will positively assist in the achievement of a number of the NSOs, including:

- NSO 1 – Compact Growth.
- NSO 4 – Sustainable Mobility.
- NSO 5 – A Strong Economy supported by Enterprise, Innovation, and Skills.
- NSO 7 – Enhanced Amenities and Heritage.
- NSO 8 – Transition to a Low Carbon and Climate Resilient Society.
- NSO 10 – Access to Quality Childcare, Education, and Health Services.

These objectives have not changed from the original NPF. The compliance of the proposed development with the NSO's are outlined in further detail in Section 4.1.1 above. The various policies in the NPF are structured under National Policy Objectives (NPO's). The proposed development is compliant with the following relevant NPO's listed below.

- ***“NPO 3 - Southern Region: 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million;***
- ***NPO 7 - Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth;***
- ***NPO 12 - 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;***
- ***NPO 13 - Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity;***
- ***NPO 14 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals;***
- ***NPO 16 - To 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 4.0 Draft Revision of NPF Ireland 2040: Targeted Pattern of City Population Growth. Relevant Cork City Figures Extracted [Extracted by TPA, 2024]**

City	Population 2022	2018 NPF	Population 2040	Growth to	Min Target Population 2040
		% range 2016-2040	% range 2022-2040	People	
Cork – City and Suburbs	223,000	50-60%	40%	96,000	320,000

- **NPO 20** - *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;*
- **NPO 22** - *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;*
- **NPO 38** - *Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages;*
- **NPO 39** - *Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services;*
- **NPO 43** - *To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040;*
- **NPO 44** - *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location;*
- **NPO 46** - *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development". [Extracted by TPA for Relevance]*

The *Draft Revision* of the NPF outlines there is significant growth expected in Cork City within the coming years and places an emphasis on increasing the housing stock currently available. The proposed development will aid in achieving these goals.

The proposed development inherently complies with the overarching themes of the *Draft Revision NPF* by proposing a compact well-designed sustainable form of residential development on an underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development accords with the *Draft Revision NPF's* aims to consolidate Cork through the development of underutilised, infill sites.

The scale and locational characteristics of the subject site therefore provides an opportunity for a sustainable, higher residential development and the delivery of a significant contribution to meeting housing need. In addition, we note the *Draft Revision NPF* supports the statutory mandate of the LDA to deliver a significant number of homes on State lands, with a particular focus on infill urban sites.

#### 4.1.3 Southern Regional Spatial Economic Strategy (RSES) (2019)

The RSES is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Southern Region. The RSES identifies regional assets, opportunities and pressures and provides policy responses in the form of Regional Policy Objectives.

The main statutory purpose of the Strategy is to support the implementation of the NPF. The strategy contains the Cork Metropolitan Area Strategic Plan (MASP) which provides a guide for investment and sustainable development across the Cork Metropolitan Area up to 2031. The MASP, which includes the subject site, reinforces Cork City's role as an international centre of scale to complement Dublin, targeting 50-60% population growth by 2040. There are a number of Regional Policy Objectives (RPOs) that are of particular relevance to the proposed development as set out below. These RPO's provide strong regional level planning policy support for the development.

- ***"RPO 10a: Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking, and cycling;***
- ***RPO 34 - Regeneration, Brownfield and Infill Development: "In pursuit of the NPF's NPO 3a, 3b & 3c, the Development Plan Core Strategy' should be accompanied by specific objectives setting out the achievement of urban infill/ brownfield development;***
- ***RPO 35 – Compact Growth: a. Local Authorities, through Development Plan and Local Area Plan policies, shall identify rejuvenation priorities within our Region's settlements which demonstrate achievement of National Strategic Outcome: Compact Growth; b. Development Plans shall set out a transitional minimum requirement to deliver at least half (50%) of all new homes that are targeted in the Region's three Cities and suburbs of Cork, Limerick and Waterford, within their existing built-up footprints in accordance with NPF National Policy Objective 3b. This will be evidence based on availability and deliverability of lands within the existing built-up footprints;***
- ***RPO 176 – 10-minute city and town concepts: "It is an objective to attain sustainable compact settlements with the "10-minute" city and town concepts, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Local authorities should ensure that decision making in relation to new infrastructure for improved connectivity is informed by an appropriate level of environmental assessment".***



There is strong policy support for the development of underutilised sites within cities/urban centres, such as the subject site, where community services and facilities are easily accessible on foot, by bicycle or using public transport. The development site is located within the *Cork Metropolitan Area Strategic Plan (MASP)* area. The NPF explicitly states that significant accelerated and urban focused growth is needed to fulfil the potential of the Cork MASP.

Cork MASP Policy Objective 2(c) *'seeks investment to achieve regeneration and consolidation in the city suburbs'*. The proposed development will assist in achieving a number of the *'guiding principles'* for investment and sustainable development in the Cork MASP. This includes the delivery of a living city and suburbs, accelerated housing delivery and the achievement of compact sustainable growth that is integrated with a high-quality public transport system. The city suburban areas are identified as a Strategic Residential and Regeneration Area in the Cork MASP. The RSES notes that;

*'There are many opportunities for redevelopment, particularly where non-residential uses rationalise or relocate freeing up infill and brownfield sites for residential and other redevelopment.'*

The RSES indicates the following infrastructure priorities for the city suburbs:

- Investment in placemaking including upgrading the public realm and provision of parks and community facilities;
- Investment in retrofitting infrastructure and services (physical, social and recreational) to improve quality of life for communities.

In our opinion, the proposed development is in full accordance with the objectives of the RSES, realising the potential of infill lands in the consolidation of Cork and its suburbs. The proposed development will provide a housing and tenure mix that will help to balance the existing pattern of predominantly private conventional family housing in the area. The proposed development is fully supported by the objectives for the Cork MASP, which promote the alignment of population and employment growth in the metropolitan area with public transport investment and a focus on consolidation and infrastructure led growth of the city and suburbs, existing hierarchy of metropolitan towns and the strategic employment locations.

Placemaking has been central to the layout and design of the proposed development, which includes a range of character areas and high quality public open spaces and public realm. The proposed development, which includes a range of unit types and sizes, will accommodate several households that will help to sustain existing community infrastructure and facilities in this area. In addition, the development includes a childcare facility that will serve residents within the scheme and in the immediate area.

#### 4.1.4 Cork Metropolitan Area Transport Strategy (CMATS) 2040 (2020)

A review of the *Cork Metropolitan Area Transport Strategy (CMATS)* strategy was undertaken, the car parking standards in the strategy are outlined in further detail below. The CMATS was published in February 2020, prior to the publication of the *Cork City Development Plan 2022-2028*. The *Development Plan* had regard to same during the Plan formulation. The Strategy applies a minimisation approach to car parking standards, and it is a default policy that parking should be minimised, where possible. The Strategy references the *National Planning Framework 2040*, stating the following.

*“There should generally be no car parking requirement for new development in or near the centres of the five cities, and a significantly reduced requirement in the inner suburbs”.*

The Strategy outlines several future provisions to increase the availability of sustainable transport and reduce the need for the use of private cars.

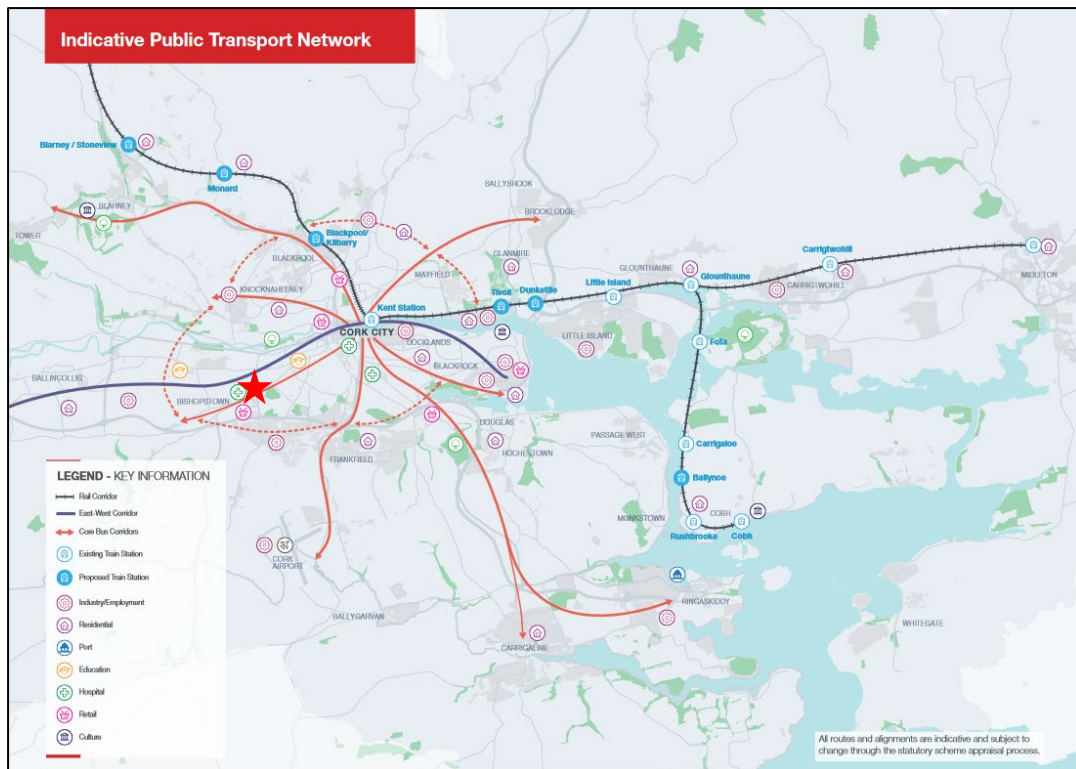
##### **Future Public Transport**

In the CMATS, Wilton is identified on the Core Bus Corridor of Cork City to Bishopstown. The strategies proposed infrastructure updates are listed as follows;

- Improved cycle infrastructure;
- Improved bus routes;
- Introduction of the Light Rail System.

The Wilton area is planned to receive a number of new cycle routes, bus routes, and a light rail line in the coming years. The proposed high-speed rail line is expected to be located c. 540m from the subject site at the Cork University Hospital. The LRT is expected to achieve the following objectives:

- *“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 employment targets for Cork City;*
- *Underpin the planned expansion of University College Cork (UCC), Cork Institute of Technology (CIT) and **Cork University Hospital (CUH)**;*
- ***Enable car-free and low car development within its catchment in line with recent changes to government policy outlined in the NPF and Sustainable Apartment guidelines;***
- ***Reduce reliance on the N40 in particular, for short trips within the Metropolitan Area”.** [Our Emphasis]*



**Figure 4.0 Indicative Public Transport Network.** Subject site is indicated just to the south of the red star. [Source: *Cork Metropolitan Area Transport Strategy CMATS 2040*, cropped and annotated by TPA 2025]

CMATS outlines no maximum or minimum figures regarding car parking provision, however, it states that a maximum parking requirement should be implemented to help reduce the parking provision in new residential developments. The Strategy places a strong emphasis on ensuring new residential developments are well located to enable residents to avail of public transport and reduce car journeys.

The strategy encourages new developments to reduce the amount of on-site parking and provide alternative methods, to move away from car-orientated settlements.

In our opinion, the proposed development is fully supported by the policies and objectives outlined in the CMATS, which promote the alignment of population and employment growth in the metropolitan area with public transport investment. This is discussed further in Section 4.2.1, as the *Cork City Development Plan* has had regard to the CMATS in its formulation. Please refer to the enclosed documentation prepared by ILTP in relation to car, cycle and EV parking provision. Sustainable transport methods are inherently supported in the design of the proposed scheme, including integration of pedestrian and cyclist permeability and ample cycle parking facilities.

It is also worth highlighting that the subject site is located in close proximity to the proposed CUH stop on the emerging preferred route for the Cork Luas, as published in April 2025, which is currently under public consultation. This proximity represents a potential strategic benefit in the context of sustainable development objectives, particularly when considering future opportunities to support increased density and more compact urban forms in areas served by existing and proposed high-quality public transport infrastructure. The Cork Luas forms a key element of the National Transport Authority's vision for integrated and low-carbon mobility in the region.

#### 4.1.5 Sustainable and Compact Settlements Guidelines for Planning Authorities (2024)

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024* sets out national planning policy and guidance in relation to the planning and development of urban and rural settlements. There is specific focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the *Sustainable Residential Developments in Urban Areas Guidelines for Planning Authorities, 2009*.

The proposed development has had regard to the *Sustainable and Compact Settlements Guidelines for Planning Authorities*. There is a renewed focus in the Guidelines on the regeneration and consolidation of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

The Guidelines constitute Ministerial Guidelines under Section 28 of the *Planning and Development Act, 2000 (as amended)*. Section 28 provides that planning authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28(1C) of the Planning and Development Act 2000 (as amended).

The Guidelines are set out in five Chapters as follows:

Chapter 1 - '*Introduction and Context*' - describes the key characteristics of sustainable and compact growth and sets out a summary of Government policy in the areas of spatial planning and housing, climate and sustainable mobility that inform the policy approach.

Chapter 2 '*Implementation*' - addresses the interaction of these Guidelines with the plan making and development management processes and with other relevant Section 28 Guidelines.

Chapter 3 '*Settlement, Place and Density*' - sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density.



The lands can be described as a ‘City - Urban Neighbourhoods’. This is outlined as follows.

*‘The city urban neighbourhoods category includes:*

*(i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses;*

*(ii) strategic and sustainable development locations;*

*(iii) town centres designated in a statutory development plan, and;*

*(iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport.*

*It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork’. [Our Emphasis]*

The lands are located in a strategic and sustainable development location in close proximity of existing (Bus Connects) Core Bus Corridor and proposed high-capacity public transport node (CUH – Cork LRT). Accordingly, we believe the higher densities noted in the Guidelines are applicable in this instance, which are noted as 50 dph to 250 dph. In this instance c. 133 units per hectare are proposed.

**Table 3.8: Accessibility**

#### **High Capacity Public Transport Node or Interchange**

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail<sup>11</sup>, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’<sup>12</sup> stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- ‘Planned public transport’ in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

**Figure 4.2: Table 3.8 of the Compact Settlement Guidelines 2024.**

Chapter 4 ‘Quality Design and Place Making’ - sets out policy and guidance in relation to quality design and placemaking to be applied in the plan making process and in the assessment of individual planning applications.

Chapter 5 ‘Development Standards’ - sets out specific planning policy requirements (SPPRs) in relation to housing standards to be applied in support of greater innovation within the housing sector and to facilitate more compact forms of residential development.

The Guidelines state that higher densities are achievable on infill urban sites, that are well connected as per Figure 4.2 above.

The site enjoys excellent connectivity due to its proximity to existing, high-frequency public transport options. Several bus routes, including the 205, 208, 202, and 203, are within a 15-minute walk and provide direct access to Cork City Centre, Cork Institute of Technology, Ballincollig, Mahon Point, Bishopstown, and Blackpool.

Transport connectivity in the area is set to improve significantly in the coming years, thanks to major upgrades planned under the Bus Connects initiative and the Cork Metropolitan Area Transport Strategy (CMATS). These projects, coordinated by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council, and Cork County Council, include the introduction of a new bus route that will directly service Sarsfield Road and the site.

Furthermore, CMATS proposes the development of a Light Rail Network for Cork, with a stop planned approximately 620 meters north of the site at Cork University Hospital. This new line will connect Mahon and Ballincollig. For more details, please refer to the enclosed documentation prepared by ILTP.

The Wilton area is well established as a district centre, where there is sufficient access to transport, employment, education, and essential services to facilitate future residential development, as noted above. Accordingly, the proposed development is within the Guidelines applicable forecasted unit per hectare requirements (with 133 no. units per hectare proposed.)

The proposed development complies with the 5 Specific Planning Policy Requirements as outlined below:

#### SPPR 1 - Separation Distances

The SPPR states:

*“When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms 16 at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.*

*There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy”.*



**Figure 4.3: Extract of DWG No. WLT-02-XX-ZZZ-DR-RAU-AR-2001 – Site Contextual Elevations, which demonstrate ample separation distances and sensitive design to reduce perceived overlooking of overbearing.**  
[Source: Reddy A+U, cropped by TPA, 2025]

Within the site itself, the buildings, private open space and fenestration arrangement have been carefully positioned to provide a high standard of privacy and amenity for residents, whilst achieving a high-density compact design. The layout and design for the residential development maintain an average separation distance of c. 19m - 28m between opposing windows serving habitable rooms within the scheme. In addition, the townhouses are between c. 23m to 37m from any existing houses in Cardinal Court.

The proposed development will provide residents with a high standard of amenity and will not have a significant negative impact on the amenity of occupiers of existing residential properties. The scheme has been designed to ensure that separation distances between habitable rooms are in accordance with SPPR1, refer to the enclosed Architectural Design Statement for further information.

#### SPPR 2 - Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards: 1 bed house - 20 sq m, 2 bed house - 30 sq m, 3 bed house - 40 sq m and 4 bed + house - 50 sq m.

The proposed townhouses, which are 3 bed units, each have their own private open space ranging from 43 sq m to 72 sq m. In addition to private space, high-quality public open space is also provided, which will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves. Therefore, we are of the opinion that the proposed development is in line with SPPR2.

We note these standards do not apply to the apartment units. The private open space for the proposed apartments is further discussed under Section 4.1.5 in accordance with requirements set out in the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023*.

### SPPR 3 - Car Parking

The SPPR sets out that:

*"In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling."*

The site is considered to be in a city centre/ urban neighbourhood, as described by the Guidelines, therefore car-parking provision is to be minimised. The proposed development does not exceed the maximum rate of car parking provision for residential development at these locations, of 1 no. space per dwelling. There are 148 no. car parking spaces, which equates to 0.42 no. spaces per unit. Accordingly, we are of the opinion that the proposed development is in line with SPPR3. This is assessed in greater detail in the enclosed Transport and Traffic Assessment + Mobility Management Plan prepared by ILTP.

### SPPR 4 - Cycle Parking and Storage

The SPPR states:

*"It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors."*

*The following requirements for cycle parking and storage are recommended:*

- (i) *Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided.*

*Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*

- (ii) *Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided."*

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. Cycle parking can be provided for all houses and mews-type dwellings in the curtilage of the unit.

High quality cycle parking is provided across the site in compliance with SPPR 4. It is noted that the proposed development's bicycle provision (503 no. spaces) is at a ratio of 1.4 per unit. The scheme's bicycle provision is further discussed in Section 4.2.1 of this Report. We note the current level of provision is marginally lower than the stated requirement of 1 no. space per bedroom. The current proposed provision equates to (0.9 no. space per bedroom). We would like to highlight that the proposed development's bicycle provision exceeds the Development Plan's requirements. Further noting that any deviation of SPPR4 is at the discretion of the planning authority, as per the Guidelines.

#### 4.1.6 The Urban Development and Building Heights Guidelines for Planning Authorities (2018)

The *Urban Development and Building Heights: Guidelines for Planning Authorities* were published on foot of the National Planning Framework. The aim of the Guidelines is to ensure that height policies do not undermine national policy objectives to provide more compact forms of development and the consolidation and strengthening of existing built-up areas. In seeking to secure the NPF's objective of achieving more compact urban growth, the Guidelines confirm a requirement to focus on:

*"Reusing previously developed "brownfield" land, **building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities.**"* [Our Emphasis]

The Guidelines further acknowledge that:

*"While achieving higher density does not automatically and constantly imply taller buildings alone, **increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability.**"* [Our Emphasis]

In submitting a planning application for increased building heights, the Guidelines set out a number of criteria which must be complied with. This is outlined in further detail below.

##### A. At The Scale Of The Relevant City/Town

*"A1. The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport."*



The site benefits from access to existing, high-frequency, public transport infrastructure. Several bus lines provide access to the City Centre and surrounding urban centres within a 15-minute walking distance of the subject site. The Wilton area has ease of access to the bus routes 205, 208, 202, and 203, these provide connections to the City Centre, Cork Institute of Technology, Ballincollig, Mahon Point, Bishopstown, Blackpool.

The subject site's connectivity is due to increase within the coming years, with significant improvements to the public transport planned under Bus Connects and the Cork Metropolitan Area Transport Strategy (CMATS), planned by the National Transport Authority (NTA) in collaboration with Transport Infrastructure Ireland (TII), Cork City Council and Cork County Council. This includes a new bus line directly servicing Sarsfield Road and the subject site.

In addition, the CMATS proposes a Light Rail Network for Cork, the stop is indicated to be located c. 620m north of the subject site at the Cork University Hospital. The new line will provide links to Mahon and Ballincollig. Please refer to the enclosed documentation prepared by ILTP for further information. This has been reinforced further through the recent publication of the proposed Cork Luas Line by the National Transport Authority and Transport Infrastructure Ireland (April 2025.)

*"A2. 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".*

A full suite of architectural drawings, supportive design statement with design details, *Landscape and Visual Impact Assessment (LVIA)*, photomontages and CGIs, and a *Daylight and Sunlight Assessment* are enclosed. These documents provide detailed information necessary for assessing the potential impacts of the proposed development, as required under A2. The proposed building heights within the development range from 2 to 6 no. storeys. The layout is designed so that the 2 no. storey townhouses are positioned on the west side of the site, aligning with the existing semi-detached houses in that area. The building heights then gradually increase toward the east, using a tiered approach, starting from 5 storeys and rising to 6 no. storeys.

This approach was chosen so the proposed development could have different levels of ridge heights to create a sense of variety in their massing and form. This also allowed for a step down to 2 no. storey townhouses at the western boundary, to integrate seamlessly with the Cardinal Court housing estate. This will assist with any perceived overlooking, overbearance and visual impact.

The proposed development's potential impact was assessed at 19 no. viewpoints. The Assessment showed that the majority of the views have a neutral, negligible, and slight impact. Please refer to the *Landscape and Visual Impact Assessment (LVIA)*, prepared by Park Hood, Chartered Landscape Architects for further information. In addition, please refer to the Verified Views booklet and prepared by Redline Studios.

## **B. At The Scale Of The District/Neighbourhood/Street**

*B1. “The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.”*

This area of Wilton has evolved in recent years, with several high-density developments existing and permitted within the vicinity of the subject site. The proposed development is not of a height greater than the building height of the permitted shopping centre redevelopment, outlined earlier in this Report, ranging from 2-6 no. storeys. The scheme has been designed to retain as much of the existing mature tree and vegetation existing on site as possible, while also providing the requested boundary treatments required by the ESB. The development also provides for substantial improvements to the public realm along Sarsfield Road which includes a high-quality landscape buffer.

*B3. “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 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).”*

As detailed above, the proposed development is considered to contribute positively to the urban design context of the site fronting Sarsfield Road, and it is noted that it is not adjoining a waterway or marine frontage. **The design team have complied with the recommendations of the GDSDS and are satisfied the development will not exacerbate existing flooding issues at the Glasheen Stream.** A flood risk assessment has been undertaken in support of the proposed development, prepared by Barrett Mahony Consulting Engineers and is enclosed accordingly. This confirms that the subject site is in Flood Zone C.

*B4. “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 proposed development includes the provision of new pedestrian and cyclist linkage to the east and south-east of the site, which improves overall accessibility and permeability within the site, which is currently not accessible by members of the public. In addition, the proposed development’s interaction to the east of the site will allow for significant improvements to the public realm and streetscape along Sarsfield Road. In addition, the proposed development facilitates the future provision of linkages to Cardinal Court to the west. These lands are in separate, private ownership however potential for a future link is outlined in the enclosed Site Layout Plan, prepared by Reddy A+U.

*“B5. “The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood.”*

The proposed redevelopment of the site will provide a mix of residential typology, which includes 1- (152 no. units), 2- (168 no.), 3- (12 no.) bedrooms apartment units, and 3-bed townhouses (16 no. units). In addition, it is the only substantial cost rental, affordable purchase and social housing scheme in the Wilton area. There is a significant amount of 3 to 4 no. bedroom residential premises located within immediate neighbourhood, among these are Cardinal Court (c. 200 m), Bishopscourt Park (c. 400m), Woodbrook Drive (c. 550m). The scheme will diversify the neighbourhood and provide increased housing options for people. As the unit mix provides the availability of 1 no. to 2 no. bed units providing much needed accommodation for smaller family units. This is discussed later in this report in relation to unit mix.

### **C. At The Scale Of The Site/Building**

*C1. "The form, massing and height of the proposed development should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light."*

*C2. "Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's "Site Layout Planning for Daylight and Sunlight (2nd edition) or BS 8206-2: 2008 – "Lighting for Buildings – Part 2: Code of Practice for Daylighting."*

*C3. "Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including site specific constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution."*

The *Daylight and Sunlight Assessment* prepared by GIA outlines that the proposed scheme performs well when assessed against the current guidelines. GIA worked alongside Reddy Architecture + Urbanism to deliver a scheme that makes the most of the available daylight and sunlight. This was achieved through an iterative review of the massing and internal layouts.

The Guidelines also identify technical assessments, which should accompany planning applications, which relate to development proposals for increased building heights. In this regard, we can confirm that all relevant technical assessments will accompany the planning application in support of the proposed development including, inter alia, an *Appropriate Assessment Screening Report, Daylight, Sunlight and Shadow Analysis, Wind Microclimate Assessment and Architectural Design Statement*.

The vast majority of rooms within the proposed development will be well daylit, providing excellent daylight amenity within all dwellings overall, when considered alongside the compensatory measures outlined in the enclosed GIA Report. The scheme has been optimised to balance daylight with the impact of providing balconies to all dwellings and protection from

overheating, and to ensure good daylight levels are provided within the zones it's most appreciated.

The majority of dwellings within the proposed development will be well sunlit, and the scheme overall is considered acceptable in terms of sunlight, when viewed alongside the compensatory measures outlined in GIA Report. The scheme has been optimised to balance sunlight with the impact of providing balconies to all dwellings and protection from overheating.

Overshadowing assessments have been undertaken for the areas of public and communal open space provided within the proposed development. Four communal open spaces are proposed within the site, all of which far exceed the BRE recommendation of 50% of their areas seeing two or more hours of direct sunlight on 21<sup>st</sup> of March and so offer very well sunlit open space throughout the year for the enjoyment of future residents. The enclosed Report notes that these open spaces would actually see in excess of six hours of sunlight throughout the spring and summer months thus showing excellent sunlight access during the times of the year when open space would be in most use. As such it is considered that all future occupants will be able to access an excellently sunlit open space throughout the year.

The Guidelines confirm that where the above criteria are incorporated into development proposals, the relevant authority shall apply the following SPPR under Section 28 (1C) of the Acts.

In this context, SSPR3 states, inter alia:

*"It is a specific planning policy requirement that where: 1. An applicant for planning permission sets out how a development proposal complies with the criteria above; and,*

*2. The assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these Guidelines; then the Planning Authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise."*

Referring back to the Guidelines regarding sustainable urban development and apartment development, there exists a suite of national planning policies that requires the delivery of higher density development to achieve national objectives surrounding housing delivery. In the context of finite land supply, increased building heights are essential in achieving the required higher densities whilst maintaining a high standard of living accommodation and achieving sustainable communities. Therefore, we are of the opinion that the proposed development is in line with the *Urban Development and Building Heights Guidelines for Planning Authorities, 2018*.

#### 4.1.7 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)

*The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023* (hereinafter referred to as the 'Apartment Guidelines'), seek to promote high density apartment development on appropriately zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

When applying the locational criteria set out within the Guidelines, the proposed development is considered to fall within the 'Central and/or Urban Accessible Locations' category. For such locations, the Guidelines state:

*"Such locations are generally suitable for small to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments."*

Locations under this designation are categorised by the following;

*"1. Central and/or Accessible Urban Locations Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:*

- *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;*
- *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;*
- *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".*

The subject site is located within walking distance of significant employment locations such as Wilton Shopping Centre (District Centre), the Cork University Hospital, and a high-frequency urban bus service. Furthermore, there are proposals under the CMATS for the introduction of increased bus lines and an LRT stop at Cork University Hospital. The delivery of a higher-density apartment development at the subject site is deemed appropriate, having regard to both the existing high level of bus services and the planned enhanced Bus Connects services, as well as the future Light Rail Network.

The Apartment Guidelines note the following in relation to Future Housing Need;

*"Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type;*



*The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes;*

*The 2016 Census indicates that 1-2 person households now comprise a majority of households and this trend is set continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe, with which it competes for investment and talent to secure continued growth and prosperity;*

*Analysis of urban housing need points to the fact that into the future, a majority of households will comprise 1-2 persons and approximately half of the remainder will be three person households. While it is recognised that it will be necessary to provide for a range of incomes, it is critical to accommodate the needs of increasingly more diverse household types in the context of a growing and ageing population...*

*While making appropriate provision to meet housing need is the key consideration, viability must also be considered, especially where there is clear evidence available. For example, research work undertaken by the Department of Housing, with input from industry and construction professionals analysing the cost of housing delivery, confirms that in a given apartment scheme that includes a proportion of three-bedroom units, replacing these units to allow larger number of one- and two-bedroom units would, contribute to greater scheme viability;*

***In accordance with Section 28 of the Planning and Development Act 2000, as amended, planning authorities must apply the standards set out as planning policy requirements in these guidelines, notwithstanding the objectives and requirements of development plans, local area plans and SDZ planning schemes.” [Our Emphasis]***

SPPR 1 of the Apartment Guidelines states the following regarding the unit mix of apartment schemes.

***“Specific Planning Policy Requirement 1;***

***Housing 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)”. [Our Emphasis]***

The proposed development includes a provision of 152 no. 1-bed (42.7%), 168 no. 2-bed (43.3%), 26 no. 3-bed townhouses and 12 no. 3-bed apartments, totalling 28 no. 3-Bed (8%). Therefore, the proposed unit mix is in line with SPPR1.

We note that the proposed development exceeds 0.25 Ha and therefore SPPR 2 does not apply to the proposed development. SPPR 3 of the Apartment Guidelines states the following regarding the floor area of apartment schemes.

***“Specific Planning Policy Requirement 3***

*Minimum Apartment Floor Areas:*

*Studio apartment (1 person) 37 sq.m;  
1-bedroom apartment (2 persons) 45 sq.m;  
2-bedroom apartment (4 persons) 73 sq.m;  
3-bedroom apartment (5 persons) 90 sq.m”.*

The proposed development adheres to the minimum apartment floor areas. The floor areas for the 1-bed apartments meet or exceed the 45 sqm standard. We note that all 2-bed apartments meet or exceed the 73 sqm standard. In addition, the 3-bed apartments meet or exceed the 90 sqm standard. For further information please refer to the Schedule of Areas/Housing Quality Assessment prepared by Reddy Architecture and Urbanism.

We note that 43% of the proposed development’s unit mix is 1-bed apartments, therefore the proposed development is in line with the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023*. Unit mix is discussed further in Section 4.2.1 of this Report. SPPR 4 states the following regarding dual aspect apartments.

***“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 in;***

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

***iii For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects”.*** [Our Emphasis]

As previously stated, 55% of the apartment units are dual aspect and therefore exceeds this requirement. Therefore, the proposed development is in line with SPPR4.

SPPR 5 of the Apartment Guidelines states the following regarding the floor to ceiling height of apartment schemes:

***“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 development’s ground level apartment floor to ceiling heights is more than the minimum requirement across the 3 no. apartment blocks. Therefore, the proposed development is in line with SPP5. For further information please refer to the accompanying Architectural Pack prepared by Reddy Architecture and Urbanism.

SPPR 6 of the Apartment Guidelines states the following regarding the lift and stair cores of apartment schemes.

***“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 complies with SPPR6. This is outlined in the floor plans submitted as part of the planning application. Please refer to the Architectural Drawing Pack prepared by Reddy Architecture and Urbanism.

As the proposed development is not a Build to Rent (BTR) scheme SPPR 7 does not apply in this instance.

In addition to the SPPR’s listed about the *Sustainable Urban Housing: Design Standards for New Apartments* outlines guidance regarding the following aspects.

***Storage Space***

Appendix A of the Guidelines outline the following minimum storage space requirements for apartments.

- *“Studio – 3 sqm;*
- *One Bedroom – 3 sqm;*
- *Two Bedrooms (3 person) – 5 sqm;*
- *Two Bedrooms (4 person) – 6 sqm;*
- *Three or more Bedrooms – 9 sqm”.*

The proposed development complies with the minimum storage space requirements for apartments.

This is outlined in further detail in the Schedule of Areas/ Housing Quality Assessment prepared by Reddy Architecture and Urbanism. Please refer to table '*Detailed Residential Schedule of Accommodation – Apartments*' in the Assessment for precise measurements, all of which are in excess of the required minimum.

#### *Private Amenity Space*

Appendix A of the Guidelines outline the following minimum private amenity space requirements for apartments.

- *“Studio – 4 sqm;*
- *One Bedroom – 5 sqm;*
- *Two Bedrooms (3 person) – 6 sqm;*
- *Two Bedrooms (4 person) – 7 sqm;*
- *Three or more Bedrooms – 9 sqm”.*

The proposed development complies with the minimum private amenity space requirements for apartments. This is outlined in further detail in the Schedule of Areas/ Housing Quality Assessment prepared by Reddy Architecture and Urbanism. Please refer to table '*Detailed Residential Schedule of Accommodation – Apartments*' in the Assessment for precise measurements, all of which are in excess of the required minimum.

#### *Communal Amenity Space*

Appendix A of the guidelines outline the following communal amenity space requirements for apartments.

- *“Studio – 4 sqm;*
- *One Bedroom – 5 sqm;*
- *Two Bedrooms (3 person) – 6 sqm;*
- *Two Bedrooms (4 person) – 7 sqm;*
- *Three or more Bedrooms – 9 sqm”.*

The proposed development includes 1,487 sq m of communal open space at podium level. In addition, 1,211 sqm of home zone open space is to be provided. This is in the context of an additional 3,545 sq m public open space. Therefore, the proposed development complies with the minimum communal amenity space requirements for apartments. This is outlined in further detail in the Schedule of Areas/ Housing Quality Assessment prepared by Reddy Architecture and Urbanism. In addition, it is outlined further in the '*Open Space Provision*' section of the Landscape Strategy Proposal, prepared by Park Hood.

### *Children's Play*

Paragraph 4.13 of the Guidelines states that the recreational needs of children need to be considered as part of the communal amenity space within apartment schemes. Schemes are to provide 85-100 sqm of play space dedicated to toddlers and children up to the age of six. In addition, 200-400 sqm of play space is to be provided for older children and young teenagers.

As previously stated, the proposed development provides 0.36ha of public open space in which there are pockets of play space integrated throughout the site. While the areas and specific uses of each play pocket are yet to be detailed there is ample provision.

At present, 156 sqm of public play areas and 154 sq m of additional play areas are identified within the site. This is in the context of informal play and seating areas noted to the east of the site. Please refer to the 'Play Area Provision' section of the enclosed Park Hood Report.

### *Bicycle Parking and Storage*

Paragraphs 4.15 - 4.17 of the guidelines outline the following regarding bicycle parking and storage.

- *“Location – cycle storage facilities should be directly accessible from the public road or from a shared private area that gives direct access to the public road avoiding unnecessarily long access routes with poor passive security or, slopes that can become hazardous in winter weather;*
- *Quantity – 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. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc;*
- *Design – cycle storage facilities shall be provided in a dedicated facility of permanent construction, preferably within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall also be designed so that cyclists feel personally safe - secure cage/compound facilities, with electronic access for cyclists and CCTV, afford an increased level of security for residents. Effective security for cycle storage is also maximised by the provision of individual cycle lockers and it is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided;*
- *Management - an acceptable quality of cycle storage requires a management plan that ensures the effective operation and maintenance of cycle parking, in particular, avoiding arrangements that lead to a significant number of lockers being left locked whilst empty for instance;*



*Cycle parking shall be the subject of a funded maintenance regime that ensures that facilities are kept clean, free of graffiti, well-lit and the parking equipment will be properly maintained. It is essential, therefore, that as far as possible cycle parking is low maintenance and easy and attractive to use by residents”.*

Bicycle parking is discussed in more detail in Section 4.2.1 of this Report. Dedicated bicycle storage is proposed to be incorporated within the podium under crofts, with additional cycle parking provided at ground level adjoining the apartment blocks. In total the proposed development includes c. 503 no. bicycle spaces both in the landscape and in dedicated stores at car-park level in the West Block and Middle Blocks.

The proposed development’s bicycle storage is outlined in full in the accompanying documentation. For further information please refer to the Report and Architectural Drawings Pack prepared by Reddy Architecture and Urbanism.

Therefore, it is our opinion that the proposed development is in line with the *Development Plan* and the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023*. Please refer to the enclosed documentation prepared by Reddy A+U for further information.

#### 4.1.8 Quality Housing for Sustainable Communities 2007

The *Quality Housing for Sustainable Communities 2007*, seeks to promote the importance of good design in new residential developments, including the need to safeguard existing heritage, scale, character, and residential amenities to contribute to the regeneration of underutilised areas.

The essential requirements of good quality, sustainable housing developments are outlined as follows:

- **Socially and Environmentally Appropriate** – The Guidelines state that residential developments should aim to provide appropriate services, amenities, dwelling type, size, and tenure that meet the needs of the people to be accommodated. The proposed scheme comprises predominantly 1 no. and 2 no. bed units (320 no. units), 3 no. bed units (12 no. units), alongside a number of terraced townhouses (16 no. units). The existing housing tenure in Wilton comprises predominately of 3 no. bed – 4 no. bed semidetached/ terraced housing. The proposed development aims to add diversity to the housing market and provide affordable housing for single people, couples and smaller family units. The development responds to the current needs of the area appropriate and in line with the sustainable development of Wilton.
- **Architecturally Appropriate** – The Guidelines state the proposed scheme should provide a design that is not only aesthetically pleasing but responds well to the existing urban environment, be mindful of the area’s cultural heritage, and enhance the neighbourhood;

The site layout provides a tiered approach in the building heights allowing for a more intimate zone, to respect views and prospects to and from the Society of African Missions to the north and the reduced scale of Cardinal Court to the west.

- **Accessible and Adaptable** – The Guidelines state that the proposed development should be accessible for all residents and adaptable to meet the requirements of residents throughout life. The range of units available within the scheme provides accommodation for people at different stages of life and allows people to downsize to meet their changing needs. The layout and design of units have been so with the accessibility of all users in mind and therefore are in line with the guidance.
- **Safe, Secure, and Healthy** – The Guidelines state that the movement and circulation of pedestrians/cyclists should be a priority when designing the layout of a development. The proposed development ensures pedestrian and cycling access is separate from the vehicle entrance, access is to be gained from the cycle and pedestrian paths on Sarsfield Road, through gateways that will be incorporated into the landscape boundary proposals. In addition, a pedestrian and cycle only path is provided through the site's central green/open space, giving direct access from Sarsfield Road and potential provision for future access to Cardinal Court to the west.
- **Affordable** – In line with the Guidelines ample thought and planning has ensured that the proposed scheme in its current form can be built, managed, and maintained at a reasonable cost. This is outlined in further detail in the accompanying documentation.
- **Durable** – In line with the Guidelines the proposed development will meet the requirement of having a service life of sixty years without the need for abnormal repair or replacement works.
- **Resource Efficient** – In line with the Guidelines the development has been designed in order to meet all current requirements such as Part L Compliance and achieve a satisfactory BER score rating. Sustainability has underpinned the overall development at all stages. This is outlined in further detail in the accompanying documentation prepared by Reddy Architecture + Urbanism and EDC Engineering.

As outlined above, we submit that the proposed development is compliant with the essential requirements outlined in the *Quality Housing for Sustainable Communities 2007*.

#### 4.1.9 Housing for All - A New Housing Plan for Ireland 2021

The *Housing for All – A New Housing Plan for Ireland 2021* outlines the Government’s roadmap to delivery housing up to the year 2030. The document carries on from and supersedes the *Rebuilding Ireland: Action Plan for Housing and Homelessness 2016*. The document outlines that an average of 33,000 no. new homes will need to be provided per annum from 2021 to 2030.

The policy outlines four pathways to achieve the overarching objectives. These are outlined as follows;

- *“Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;*
- *Increasing New Housing Supply; and*
- *Addressing Vacancy and Efficient Use of Existing Stock”.*

The policy outlines how the Land Development Agency is to play an active role in achieving the government’s housing targets. The Government has increased the remit of the LDA and provided additional funding to aid the development of affordable housing. The following is stated;

*“The LDA will be a new and important source of affordable housing on public lands, and will advance a new initiative, Project Tosaigh, to enhance the early delivery of new affordable homes;*

*The LDA will deliver a significant number of homes on State lands, and in association with Local Authorities in major mixed tenure developments;*

...

*An annual average investment of in excess of €4bn in housing, through an overall combination of €12bn in direct Exchequer funding, €3.5bn in funding through the Land Development Agency (LDA) and €5bn funding through the Housing Finance Agency (HFA);*

*State land bank to provide more land to the LDA to bring forward up to 15,000 homes and State to fund Local Authorities for land acquisition;*

...

*To ensure there is sufficient supply across the country, each Local Authority has been given Housing Supply Targets. These, together with updated planning guidance, will ensure sufficient land is zoned for housing. The Government will support this by providing additional State lands to the LDA”. [Relevant Quotes Extracted]*

The development of the subject site to provide housing units is in line with the LDA's role as outlined in the *Housing for All - A New Housing Plan for Ireland 2021*.

As noted above, the subject site is currently underutilised, urban, state-owned land. The proposed development aims to aid in achieving national housing targets by activating this previously undeveloped site to provide affordable housing within an existing urban centre. This fully aligns with and supports the government's aim to achieve a more sustainable housing system as set out in the Plan.

#### 4.1.10 Climate Action Plan 2024 – Changing Ireland for the Better (2024)

The *Climate Action Plan 2024* is the second annual update to Ireland's Climate Action Plan 2019. The plan implements the carbon budgets and sectoral emissions ceilings and sets out a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero no later than 2050, as committed to in the Programme for Government.

It sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development.

The proposed scheme exemplifies compact development by leveraging its proximity to public transport and existing infrastructure in an existing built-up area. It encourages active transport and reduces car parking, to shift away from car-centric development. The transport strategy for the development is detailed in the *Traffic and Transportation Assessment & Mobility Management Plan* by ITLP Consulting. The design of the buildings aligns with energy efficiency guidelines, as outlined in the *Design Statement* by Reddy A+U, the *Energy & Heating Strategy Comparison Report* by EDC Engineering, and the *Infrastructure Report and Flood Risk Assessment* by Barrett Mahony Civil and Structural Engineers.

#### 4.1.11 The Design Manual for Urban Roads and Streets (DMURS) (2019)

A key objective of DMURS is to achieve safe, attractive and vibrant streets by balancing the needs of all users, and prioritising alternatives to car journeys.

The Manual advocates a design-led approach, which takes account of both the physical and social dimensions of place and movement. The subject proposal is fully consistent with this recommended approach and achieves a sense of place and residential amenity whilst also facilitating efficient and secure internal movement.

ITLP Consulting prepared the enclosed *DMURS and Cycle Manual Compatibility Statement Compatibility Statement*, which confirms that the proposed development is consistent with the principles and guidance of DMURS.

#### 4.1.12 Part V of the Planning and Development Act 2000: Guidelines (2017)

This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 *Guidelines*, which states:

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

The proposed development is subject to the requirements of Part V of the *Planning and Development Act 2000 (as amended)*. Social housing provision requirements were discussed and agreed upon with the Housing Department in Cork City Council in advance of lodgement of the planning application. A total of 72 no. apartments are to be provided in the eastern apartment block, comprising 36 no. social housing apartments and 36 no. cost rental apartments. The unit mix is to consist of 37 no. 1-bed units, 23 no. 2-bed units, and 12 no. 3-bed units. Please refer to the PART V documents enclosed in the planning application for further information and the subsequent agreement from Cork City Council.

#### 4.1.13 Department of the Arts, Heritage and the Gaeltacht ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011)

All development proposals potentially impacting on Protected Structures and places designated as Architectural Conservation Areas and candidate Architectural Conservation Areas shall have regard to the Department of the Arts, Heritage and the Gaeltacht ‘*Architectural Heritage Protection Guidelines for Planning Authorities*’ (2011).

We note that no protected structures are located within the subject site and the site is not in a designated Architectural Conservation Area. No known archaeological sites or national monuments are noted within the site boundary. Please refer to the enclosed *Archaeological Impact Assessment*, prepared by John Cronin + Associates for further information.

#### 4.1.14 The Urban Design Manual: A Best Practice Guide (2009)

It is understood that the intention is to prepare a replacement Urban Design Guidance document to reflect the Compact Settlement Guidelines 2024. However, this document has not been published to date and as *inter alia* the Development Plan refers to the Urban Design Manual 2009, it is assessed here.

The *Urban Design Manual* presents 12 no. criteria that should be used to facilitate assessment of planning applications and should therefore be used as a guide to steer best design practice for residential proposals.

The figure below illustrates how the 12 no. criteria have been sequenced in a logical order and the order of the criteria reflects the prioritisation and processes that should be adopted: i.e. not moving onto matters of detail until the important structural decisions have been taken.



The 12 no. criteria are subdivided into three groups: Neighbourhood; Site; and Home, respectively, reflecting the sequence of spatial scales and order of priorities that is followed in a good design process.



Figure 4.1.2: Urban Design Criteria. [Source: *Urban Design Manual*, 2009]

In short, the proposal's response to the various criteria set out by the Guidelines is summarised as follows. Please refer to the enclosed *Architectural Design Report* prepared by Reddy Urbanism + Architecture for further details.

### Context

The proposed development has been designed to positively respond to the neighbouring properties of the site, the natural topography and the provisions of the *Cork City Development Plan (2022-2028)*. Please refer to enclosed Architectural Design Statement and Landscape Design Statement. Both of these Reports outline in great detail how the surrounding, existing context was considered during the iterative design approach to the proposed scheme.

### Connections

The proposal provides new pedestrian and cycle links to the development, connecting to Sarsfield Road creating an active street frontage.

One vehicular access point is to be provided by connecting the site to the existing ESB vehicle access to Sarsfield Road, which is to be reconfigured. A series of new pedestrian pathways and cycle paths within the scheme will also further improve permeability. The scheme also makes provision for future pedestrian and cycle connections within the subject site to Cardinal Court to the west. Additional pedestrian access is provided to Sarsfield Road.

### Inclusivity

The proposed development provides a range of residential unit types (apartment and townhouse) which will cater for a range household types and tenures to meet the needs and requirements of all sectors of the community.

The proposed development's Part V Provision is outlined the *Housing Quality Assessment* prepared by Reddy Architecture + Urbanism. The design of the scheme ensures that the residential elements are fully accessible for people with disabilities. All elements of the scheme fully comply with Part M of the Building Regulations. There is a range of communal and private amenity spaces and facilities for children and people of different ages. Own-door, ground floor units have been provided in the development. Disabled car parking provision is also provided in the development. High-quality, functional public open space is provided at strategic locations throughout the development. Please refer to the accompanying Architectural Pack prepared by Reddy Architecture + Urbanism for further information.

### ***Variety***

As previously outlined, the proposed mix of housing types and sizes is to cater for a variety of accommodation needs and create a mixed sustainable community.

**Table 4.1 Breakdown of Residential Units by Bedroom and Type**

Breakdown of Residential Units by No. of Bedrooms		
Type	No.	%
1 Bed	152	44%
2 Bed	168	48%
3 Bed	12	3%
3-Bed Townhouses	16	5%
Total	348	100%
Breakdown of Residential Units by Type		
Type	Apartments	Townhouses
1 Bed	152	0
2 Bed	168	0
3 Bed	12	16
Total	332	16
Source: Reddy Architecture + Urbanism 2025.		

### ***Efficiency***

The proposed development has ensured to utilise the land available as efficiently as possible. The layout of the scheme was done so to maximise the land available and provide a high-density scheme on underutilised, infill land. Therefore, we are of the opinion that the proposed development is in line with national and regional guidelines to provide much needed housing on underutilised lands.

### ***Distinctiveness***

The design of the scheme was developed with respect to the established residential neighbourhoods to the west and the specific topography of the site. An underlying objective, and key factor in the layout and design of the scheme, was the retention of mature stands of trees, while also providing the requested boundary treatments required by the ESB. The proposed architectural design seeks to reflect this as noted in the enclosed Architectural Design Statement. The proposed landscaping scheme, as prepared by Park Hood Chartered Landscape Architects, will ensure that the proposal assimilates well into its surroundings, as outlined above, the application also seeks to provide to increase pedestrian and cyclist permeability within the new development.

### ***Layout***

The scheme layout will facilitate viewpoints, pedestrian desire lines and encourage pedestrian movements. The layout also provides for a new landscaped public open space, at accessible locations. Traffic speeds are controlled by design and layout and the scheme is fully DMURS compliant, which is outlined in the *Traffic and Transportation Assessment & Mobility Management Plan* prepared by ILTP Consulting.

### ***Public Realm***

High quality public realm design and public open space has been appropriately located in the scheme and is fully accessible for all residents and visitors. All open space areas are overlooked to provide natural surveillance.

### ***Adaptability***

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

### ***Privacy and Amenity***

Almost all units enjoy dedicated and generous private open space provision (balconies, gardens and terraces etc.), which are not unduly overlooked. Through detailed design the proposed open space comprises of the following.

There is to be a semiprivate 'village green' to the opening of the site, to which the eastern block has access to. The 2 no. middle apartment blocks are south facing with community decks built over car park podiums to provide a communal semiprivate open space for residents. A central open space is provided for the townhouses, including green spaces, play areas, and seating. Each of the townhouses enjoy their own private amenity spaces to the rear. All apartments are equipped with terraces or balconies.

### ***Parking***

It is proposed to provide 148 no. car parking spaces for the 348 no. proposed residential units and other uses on site. Resulting in overall approximately 0.43 spaces per dwelling for the proposed development. When broken down this equates 1:1 ratio of car parking spaces to the 16 no. housing units and a 1:0.4 ratio of car parking spaces per apartment unit.

It is to be noted in this provision that 4 no. spaces will be allocated for the proposed childcare facility and 2 no. spaces allocated to a car shares scheme. This aligns with the *Development Plan's* standards and the *Compact Settlement Guidelines*.

In addition, the Report prepared by ITLP outlines the proposed development's compliance with the *Cork City Development Plan*. The plan encourages residential developments to minimise the car parking provision with no minimum requirement.

### ***Detailed Design***

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

The layout has been expressly informed by the need to maximise amenity for future residents, whilst also protecting the amenity of the surrounding existing dwellings. Following the initial the various Pre-Planning discussions the design team have implemented the comments from the various departments in Cork City Council, into the design.

### ***Universal Design***

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

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

The scheme has been comprehensively evaluated and tested against these requirements during Detail Design Stage.

This Manual, along with the Development Plan standards for housing have informed the design of the 348 no. units proposed in the scheme.

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

#### 4.1.15 The Planning System and Flood Risk Management (2009)

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

Barrett Mahony Consulting Engineers have prepared the enclosed *Site-Specific Flood Risk Assessment* (SSFRA), in accordance with the requirements of the Guidelines. This Assessment concludes the developed site is shown to be in Flood Zone C and not to be at a significant risk from flooding and to not create a significant risk to adjoining areas or downstream. Therefore, the development is deemed acceptable from a flood risk assessment perspective. Please refer to the enclosed Assessment for further information. **The design team have complied with the recommendations of the GDSDS and are satisfied the development will not exacerbate existing flooding issues at the Glasheen Stream.**

#### 4.1.16 Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)

The *Appropriate Assessment Guidance* was published to guide compliance with the Birds Directive, 1979 and the Habitats Directive, 1992 as implemented in Irish law by Part XAB of the Planning and Development Act 2000 (as amended).

Malone O'Regan Environmental Consultants have undertaken an *Appropriate Assessment* (AA) Screening for the proposed development. It outlines the information required for the competent authority to screen for appropriate assessment and to determine whether the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

Drawing upon the conclusions of the AA Screening no significant impacts are expected on Natura 2000 sites, alone or in combination with other plans and projects. Please refer to the enclosed Malone O'Regan documentation for further information in this regard.

#### 4.1.17 Childcare Facilities Guidelines (2001)

The *Childcare Facilities Guidelines (2001)*, generally recommend the provision of childcare facilities for residential development with 75 No. units or more, having regard to the existing geographical distribution of such facilities in the area and the emerging demographic profile of the area. In this case, a residential development of 348 No. units is proposed. The proposed development includes a childcare facility accordingly.

The enclosed *Childcare Demand Assessment*, which has regard to the capacity within the existing local childcare network. Refer to Section 7 of the *Childcare Demand Assessment* for further details on the proposed development's childcare provision and also identifies capacity in the surrounding childcare facilities.

We therefore confirm that the scale of the proposed childcare facility is adequate for the proposed development, having regard to the findings of the *Childcare Demand Assessment*, prepared by Tom Phillips + Associates.

The proposed childcare facility is highly visible and adjoins the village green which provides almost an acre of green space available to the childcare facility, two informal play areas, seating and planting, all designed by the Landscape architects. The facility also affords pastoral views over the retained mature trees within the green and has immediate connection to the active travel route which connects to Sarsfield Road. It is intended that this will be a full day-care facility for babies (0-1 year) and toddlers (1-2 years). The facility can accommodate 52 no. children, based on the minimum floor space per child of 2.32 sqm as outlined in the above document, this is exclusive of kitchen, bathroom and hall, staff and ancillary areas.

The facility will provide three large, dedicated classrooms and a sleep room for babies. These spaces will be supported by kitchen/staff room, office/reception storage and bathrooms. One classroom opens directly out to the facility play area which leads onto the open space. Please refer to the enclosed Reddy A+U documentation for further information.

In addition, it is noted that any future operator on the site would be subject to operational requirements, as advised by Túsla, in relation to classroom sizes and classroom ratios.

## 4.2 Compliance with Local Planning Policy

As a part of this Report, a review of the relevant policy at a county/local level was undertaken. The *Cork City Development Plan 2022-2028* is considered below.

### 4.2.1 Cork City Development Plan 2022-2028

#### Strategic Objectives

Chapter 1 of the *Development Plan* outlines 9 no. Strategic Objectives (SO's), these are utilised as a baseline to guide development within the city. The objectives are aligned with the United Nation's *Sustainable Development Goals* and the National Strategic Outcomes in the *National Planning Framework (Ireland 2040 – Our Plan) (2018)*.

The proposed development is in harmony with several of these Strategic Objectives. This is outlined in further detail below.



### **SO1 – Compact Liveable Growth**

The proposal comprises the development of an underutilised greenfield infill site in the inner southwest suburbs of Cork City. The development will help to deliver the concept of a 15-minute city through the provision of a new residential development, that has ease of access to existing community services, facilities, and places of employment on foot or using public transport.

### **SO2 – Delivering Homes and Communities**

The density proposed is c. 129 dph (348 no. units over 2.7 ha). The majority of the subject site is identified to be within the '*Inner Urban Suburbs*' (supports 50-100 dph). A small portion to the east of the site is identified as '*Outer Suburbs*' (supports 40-60 dph). While the proposed density is marginally outside the site's envisioned capacity, it is our opinion due to its characteristics and location the site should be considered for a higher density. The rationale supporting the proposed density is outlined in further detail within this Report. The proposed density is thought to be appropriate having regard to the site's characteristics. The development includes a mix of unit types and sizes. The site is well served by existing and future public transport proposals. Residents will have access to a range of community facilities and services nearby. In addition, it is proposed to include the provision of a childcare facility within the development. This provides an active use aiding the development's integration with the existing urban neighbourhood.

### **SO3 – Transport and Mobility**

The proposed development is served by existing bus routes high-frequency, public transport infrastructure. Several bus lines provide access to the City Centre and surrounding urban centres within a 15- minute walking distance of the subject site. The Wilton area has ease of access to the bus routes 205, 208, 202, and 203. In addition, it is to be noted that the CMATs outline the proposed Light Rail Network for Cork, including a stop in Wilton which is in proximity to the subject site.

The sustainable location of the site with convenient access to walking, cycling, and public transport infrastructure will encourage more sustainable transport choices amongst future residents.

### **SO4 – Climate & Environment**

The subject site is currently greenfield. The proposed development will result in a more efficient use of zoned, serviced urban land. The sustainable location of the site, in the inner southwest suburbs, will encourage sustainable travel patterns amongst residents. It is in close proximity to Wilton District Centre and the City Centre. There are bus stops within walking distance of the subject site. There are further improvements to bus routes serving the Wilton area and the introduction of a Light Rail Network proposed under the CMATs, which will increase the site sustainability even further.

The dwellings have been designed to be energy efficient to meet the standards of the current legislation. Please refer to the accompanying documentation for further information regarding this.

### **S05 – Green and Blue Infrastructure, Open Space and Biodiversity**

The site is not located within or adjacent to any Special Areas of Conservation, Special Protection Areas, Natural heritage Areas or proposed Natural Heritage Areas. The protection of the trees in situ on site was key in designing the layout of the site. In addition, where tree removal is unavoidable new planting is proposed as a mitigation measure. This has been balanced with requests from the adjoining landowner, the ESB, who had requirements in relation to boundary treatments. The proposed development includes the following SuDS measures – green roof – extensive, green roof intensive, permeable paving, bio retention and tree pits.

The site is not located within a Conservation Area, nor does it include any Protected Structures or structures listed on the National Inventory of Architectural Heritage (NIAH).

The Landscape Design Rationale prepared by Parkhood proposed both green and blue infrastructure elements. Please refer to the enclosed documentation for further information.

### **S07 – Heritage, Arts and Culture**

We would like to highlight that the development is not located within an Architectural Conservation Area, nor does it include any Protected Structures or structures on the NIAH. The proposed development has been designed to offer new interaction with Sarsfield Road, creating a parkland effect for pedestrians and cyclists to avail of. The new development aims to incorporate a currently disused site into the surrounding urban environment to create a vibrant new neighbourhood.

### **S08 – Environmental Infrastructure**

The proposed development has been designed to respond to and prepare for the impact of climate change. The planning application outlines several mitigation and adaptation measures that have been incorporated into the scheme's design. Please refer to the enclosed Scheme Sustainability Statement prepared by Tom Phillips + Associates. In addition, the accompanying architectural pack prepared by Reddy Architecture + Urbanism outlines the rationale underpinning the design of the proposed development.

### **S09 – Placemaking & Managing Development**

Placemaking has been central to the layout and design of the proposed development. The proposal comprises a walkable neighbourhood that promotes healthy living, wellbeing, and active lifestyles. The development includes a variety of public open spaces and public realm for residents of all ages. Please refer to the accompanying documentation for further information.

### **Core Strategy**

Chapter 2 of the *Development Plan* sets out the Core Strategy. Wilton is identified within one of the urban areas noted to support compact growth and consolidation of the urban fringe. The role of the City Suburbs (of which Wilton is part) in the delivery of the Core Strategy is set out as follows:

*“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”.*

Table 2.2 of the *Development Plan* indicates that the southwest suburbs will accommodate 4.7% of the future population growth within the City to 2028. There are a number of Core Strategy Objectives which provide direct policy support for the development of the subject site, including the following:

*“Objective 2.10 The 15-minute City that aims “to support the delivery of a 15-minute city that supports compact liveable growth by creating vibrant local communities that can access all necessary amenities within a 10-minute walk/ cycle and access workplaces and other neighbourhoods with a 15-minute public transport journey...”.*

*Objective 2.14 Walkable Neighbourhoods which states that “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 the creation of ‘dead’ spaces. c. Ensuring a child friendly and age friendly environment applying Universal design principles with a mix of household types. 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 2.17 Neighbourhood Design states that “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 2.24 Underutilised Sites is that “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 2.31 Compact Growth sets out that “it is an objective to target the delivery of 65% of all new homes in Cork City on lands within the existing built footprint of the city, as set out in the Core Strategy”. Objective 2.32 Housing Supply seeks to “support an increase in the supply, affordability and quality of new housing in the city and provide a range of housing options delivering good design that is appropriate to the character of the area on which it is built, while also achieving an efficient use of zoned and serviced land”.*

The strategy outlines that compact growth within existing urban areas is essential to ensure the sustainable development of the city. Furthermore, Wilton is identified as an area suitable to facilitate compact growth and aid in reaching the City's targeted evolution. Therefore, we are of the opinion that the proposed development is in line with the core strategy of the *Development Plan*.

### **Delivering Homes and Communities**

Chapter 3 of the *Development Plan* includes objectives aimed at creating and maintaining sustainable neighbourhoods to ensure the community infrastructure needed is delivered. The Chapter states the significance of the "15 Minute City" as a key concept underpinning Cork City Council's planning policy framework. The basis of a 15-Minute City is the ability to walk and cycle to access resources and facilities within their neighbourhood.

The supporting documentation submitted with this planning application demonstrates that the subject site is within 15 minutes of local commercial services, childcare, primary schools, and other community services, a high-quality bus network, and open spaces.

Please refer to the Community Infrastructure Audit prepared by Tom Philips + Associates. In addition, the documentation prepared by ILTP Consulting engineers outlines the surrounding transport infrastructure available to current and future residents.

The proposed development is consistent with *Policy Objective 3.1 Planning for Sustainable Neighbourhoods* which seeks to:

*"b) Require development proposals to put placemaking at the heart of their design concept and clearly demonstrate how neighbourhood integration, health and wellbeing and enhancement is central to this*

*c) Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide', universal design principles and any updates;*

*d) Ensure that an appropriate level of supporting neighbourhood infrastructure is provided in conjunction with, and as an integral component of, residential development in New Sustainable Neighbourhoods;*

*f) Create healthy and attractive places to live consistent with NPO 4 of the NPF and Goal 3: Sustainable Place Framework of the RSES".*

Accordingly, proposed development aligns with *Objective 3.3 New Housing Supply* which states that "provision will be made for at least 17,118 new homes to be built in Cork over the *Development Plan* period".

### **Land Use Zoning**

The subject site is identified to be located within Zoning Map 08 – South-Western Suburbs, Volume 2 of the *Cork City Development Plan 2022-2028*. The subject site is zoned 'ZO 01 Sustainable Residential Neighbourhoods'. The *Development Plan* states the following.

*“Sustainable Residential Neighbourhoods Zoning Objective 1: **To protect and provide for residential uses and amenities, local services, and community, institutional, educational and civic uses**”. [Our Emphasis]*

The subject site is zoned to support and facilitate residential development, the Plan further states;

***“ZO 1.1 The provision and protection of residential uses and residential amenity is a central objective of this zoning. This zone covers large areas of Cork City’s built-up area, including inner-city and outer suburban neighbourhoods. While they are predominantly residential in character these areas are not homogenous in terms of land uses and include a mix of uses. The vision for sustainable residential development in Cork City is one of sustainable residential neighbourhoods where a range of residential accommodation, open space, local services and community facilities are available within easy reach of residents;***

***ZO 1.2 Development in this zone should generally respect the character and scale of the neighbourhood in which it is situated. Development that does not support the primary objective of this zone will be resisted;***

***ZO 1.3 Primary uses in this zone include residential uses, crèches, schools, home-based economic activity, open space and places of public worship.” [Our Emphasis]***

The purpose of this land use zoning is to ensure the continued development of urban neighbourhoods within Cork City.

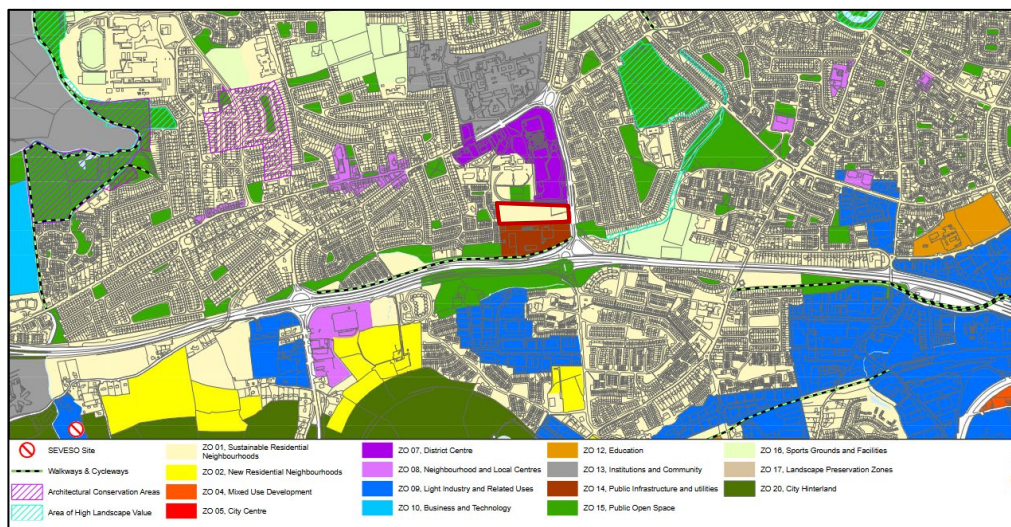


Figure 4.2.0.: Zoning Map. Subject site is shown by indicative red outline. [Source: Map 08 – South-Western Suburbs, Volume 2 of the *Cork City Development Plan 2022-2028*, cropped and annotated by TPA 2025]

### Cork City and County Joint Housing Strategy and Demand Assessment (HNDA)

As part of the *Cork City Development Plan*, the Joint Housing Strategy and Demand Assessment has been prepared by KPMG Future Analytics and Lisney on behalf of Cork County Council and Cork City Council. The HNDA aimed to distil national and regional guidance into the *Development Plan*’s objections and policies.



The strategy also takes into account the boundary changes between the City and the County in recent years and addresses the housing needs and markets accordingly.

The basis for the HNDA is based on demographics, affordability, and wider economic trends to build a housing stock profile, identify pressures, and needs.

This allows the Local Authorities to estimate future housing needs. The strategy outlines a six-year plan to produce c. 16,238 houses, estimating an output c. 2,706 per annum is needed to reach this target.

Wilton is identified to be within the South-West Suburbs, the following is stated;

***“South-West Suburbs - The South-West Suburbs include the areas of Togher, Ballyphehane, Bishopstown,. and Wilton and had a population of 40,237 in 2016 (19% of the total City population). The Cork City Development Plan 2022-2028 sets a population target of 42,543 by 2028 for the area, an increase of 2,316 or 6%, and a housing target of approximately 926 units.***

***The South-West Suburbs are also targeted for significant transport investment, particularly the proposed light rail line to Ballincollig;***

***The South-West Suburbs also contain a broad social mix. Given the amount of land available, the area will be important in delivering a range of housing types and tenures to meet overall demand in the City, including social housing delivered through Part V and direct delivery. The South-West Suburbs contain both of Cork’s major third-level institutions, UCC and MTU, as well as other major public institutions such as Cork University Hospital;***

***There will therefore likely be continued demand for private rented accommodation in particular in the area as well as for purpose-built student accommodation. Delivery of this housing will be important to meet this demand, provided it is delivered in accordance with the policies of the Cork City Development Plan to ensure appropriate housing quality and tenure mix”. [Our Emphasis]***

The proposed development aims to provide affordable cost rental apartment and affordable purchase housing scheme with a unit mix comprising of 1-3 no. bed apartments, and 3 no. bed houses in an area where the existing housing stock is predominately privately owned 3-4 no. bed semi-detached and detached houses and terraces. As outlined in the HDNA, due to the proximity of Cork University Hospital and third-level institutions there is an increasing need to provide rental accommodation across a wide variety of unit mixes. The proposed development seeks to provide diversity to the housing market to meet the needs of the population currently and into the future. This is discussed further below in the section on *Unit Mix*.

In Section 4.4.3, Tables 4.39 and 4.40 of the HNDA state that c. 43% of the anticipated households in Cork City over the strategy period will be apartments. With targets of c. 507-543 apartments to be provided per annum from 2024 – 2027. The proposed development will aid in achieving these targets and provide much needed housing for the current and future populations' needs. The HNDA states;

***“It is also important to note that the breakdown of unit mix and dwelling type for future housing stock is influenced by many factors in addition to demographic demand***



and population dynamics. Housing market factors play an important but fluid role in delivery of housing.

As noted in Section 3, **there is strong demand in Cork for apartments**, while the proportion of households in apartments is relatively low by European standards and may be expected to rise;

However, apartment delivery is also constrained by market factors, particularly viability, as discussed in Section 3.2.5. **As a result, unit type mix over the 2022-2028 period is difficult to forecast with any degree of certainty as the type of new units that will be developed in the coming years will depend heavily on market conditions, development costs, economic conditions, and public policy including national measures to stimulate housing development.**

It will also be determined by local planning policy set by Cork County Council and Cork City Council. As a result, the Cork City Development Plan 2022-2028 **considers that at least 1,000 new apartments will be delivered per annum over the strategy period, as a more realistic outcome based on market and planning conditions over this period**". [Our Emphasis]

The strategy outlines a vast demand for apartments within Cork City to meet the changing needs of the current and future population. The strategy acknowledges that unit type and unit mix are highly dependent on external factors that influence buyer needs and viability. The proposed development is both viable and catered to respond to the current market demands. Importantly, the scheme is to be cost rental, as noted above, which will cater to an undersupply of tenure of this nature in the City. This is discussed further below in the section on *Unit Mix*.

Table 4.26 of the Strategy shows the anticipated number of 1 and 2 no. person households as being significantly higher than 3 and 4 no. person households. The household size cohort for anticipated households in Cork City is outlined as follows;

- **1-Persons Household;** annual output ranging between c. 674 – 675 from 2024 to 2027;
- **2-Persons Household;** annual output ranging between c. 801 – 797 from 2024 to 2027;
- **3-Persons Household;** annual output ranging between c. 481 – 479 from 2024 to 2027;
- **4-Persons Household;** annual output ranging between c. 447 – 454 from 2024 to 2027.

This reflects the current population trends and shows a greater need accommodation for 1-2 no. person households. The proposed development is in line with the current and future housing demand, as the scheme aims to provide 1-2 no. bed units along with a number of 3 no. bed units. Please refer to Appendix A for further demographic information in this regard.

### Development Management

Chapter 11 of the *Development Plan* sets out the placemaking and development management standards for the City. The density, height and tall building elements within the Plan, as outlined in Chapter 11 are taken from a detailed strategy published in 2021, the *Cork City Urban Density, Building Height and Tall Building Study*, prepared by Allies and Morrison.

This is a 180+ page document which surveys and sets out an evidence-based approach, assesses the entirety of the City in terms of prevailing heights and sets out a strategy for future height and density and is appended to the *Development Plan*.

Relevant design standards outlined in Chapter 11, and elsewhere in the Plan, are outlined in further detail below.

## Density

A review of the *Development Plan*'s policies regarding density provision was undertaken and we note that the majority of the site is designated as 'Inner Urban Suburbs' with a small portion of the south-eastern boundary designated as 'Outer Suburbs'. Residential densities are set out in Table 11.2. of the Plan. Densities are expressed in terms of minimums and maximums for the constituent areas of the City. Density targets and prevailing character of an area are the key metrics in determining site-specific density.

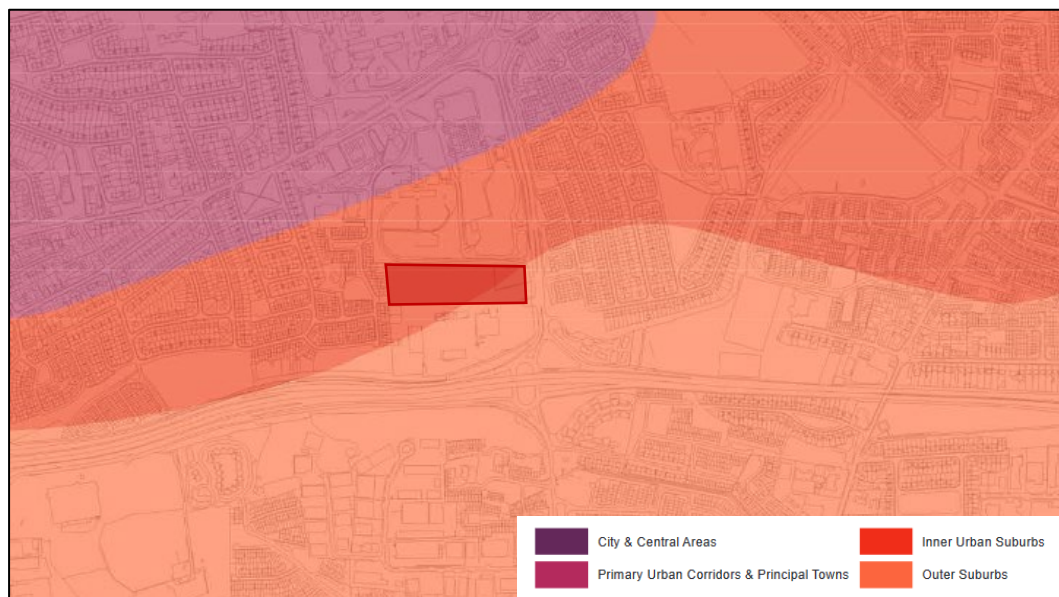


Figure 4.2.1: South-Western Suburbs area density heat map. Subject site indicated with red outline. [Source: Map 08 South-Western Suburbs, *Cork City Development 2022-2028*, cropped and annotated by TPA, 2025]

The Wilton area (noted in Figure 4.2.1 above) is designated as 'Fringe, Corridor, Centre', and the *Development Plan* states a density of 50-120 dwellings per hectare is accepted in these locations. However, the subject site itself is substantially located in the Southwest Corridor and is designated as 'Inner Urban Suburbs' and 'Outer Suburbs'. The Plan outlines a density of 50-100 dwellings per hectare for the Inner Urban Suburbs and 40-60 dwellings per hectare for the Outer Suburbs. Please refer to Figure 4.2.3 below for the relevant *Development Plan* extract.

The subject development currently proposes a total of 348 no. units on a c. 2.7 ha site (c. 129 DPH). The proposed development is above the maximum density outlined within

the *Development Plan*. However, it is our belief the proposed development is in line with a number of other objectives in the *Development Plan* and also assists in achieving the set housing targets for Cork City, which allow for a broader interpretation of the density heat mapping.

Density and Building Heights Strategy	Density					Heights			
	FAR		Dwellings Per Hectare			No. of Storeys			
	Prevailing	Target	Prevailing	Target*		Prevailing		Target	
				Lower	Upper	Lower	Upper	Lower	Upper
<b>City</b>	2.5 - 7	4+	10 - 25	100	N/A	2	5	4	8**
City Centre	2.5 - 7	4+	10 - 25	100	N/A	2	5	4	6
North Docks	0.5 - 1	3+	0 - 40	100	N/A	2	3	4	7
South Docks	0.5 - 1.5	4+	0 - 10	100	N/A	2	4	5	10**
<b>Fringe / Corridor / Centre</b>	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
<b>Wilton</b>	0.5 - 3.5	1 - 4	10 - 25	50	120	2	4	3	5
<b>Inner Urban Suburbs</b>	0.2 - 1.5	0.5 - 2.5	10 - 40	45	100	2	4	3	5
1. The Urban North	0.2 - 0.7	0.5 - 1.5	10 - 25	50	100	2	3	3	4
2. Tivoli	0.2 - 0.7	0.5 - 3.5	0 - 10	50	100	2	4	3	5
3. Ballintemple & Blackrock	0.2 - 1.5	0.5 - 1.5	10 - 25	40	80	2	4	3	5
4. Douglas	0.2 - 2.5	0.5 - 3.5	5 - 20	50	100	2	3	3	4
5. South Link Road Corridor	0.2 - 1.5	0.5 - 2.5	15 - 40	50	100	2	3	3	4
<b>6. South West Corridor</b>	0.2 - 1.5	0.5 - 2.5	20 - 40	50	100	2	3	3	4
7. North West	0.2 - 1.5	0.5 - 1.5	10 - 25	40	80	2	2.5	2	4
8. North Blackpool	0.2 - 1.5	0.5 - 1.5	0 - 25	40	100	2	4	3	5
9. Central Ballincollig	0.5 - 3.0	0.7 - 3.5	10 - 25	50	100	2	4	3	5
10. Blarney	0.2 - 1.5	0.5 - 1.5	0 - 25	35	50	1	2	2	3
11. Stoneview	0.2 - 0.7	0.5 - 1.5	0 - 25	40	80	1	2	2	3
<b>Outer Suburbs</b>	0 - 1.5	0.2 - 1.5	0 - 25	40	60	2	3	2	4

Figure 4.2.3: Density and Building Heights Strategy. Relevant areas indicated by red outline(s). Wilton annotation included for context of district centre adjoining the site. [Source Table 11.2, Chapter 11 'Placemaking and Managing Development', Cork City and Development Plan 2022-2028, cropped and annotated by TPA, 2025]

We also note that the density heat mapping has evolved from the *Cork City Urban Density, Building Height, and Tall Building Study*, which is appended to the *Development Plan*, which suggests that flexibility should be applied to the metrics and that individual sites should be assessed on a case-by-case basis. This should have regard to existing and permitted patterns of development in the vicinity of the site. This is discussed further in following sections of this Report. The Plan includes a number of policies that address residential densities specifically, these are outlined in further detail below.

*“Residential Density 3.22 Optimising the density of any development and ensuring that the best use of land is made are core responsibilities of the planning system and in achieving a more compact form of urban development in Cork City that promotes resource efficiency;*

3.23 Cork City Council has prepared the Cork City Urban Density, Building Height and Tall Building Study as an input into the planning strategy for Cork City. The Study has provided a key input into the residential density assumptions that underlie the Core Strategy and other development objectives of this Plan;

Building height and the tall building strategy are outlined in Chapter 11: Placemaking and Managing Development;

3.24 **The density strategy is based on the suitability of sites within Cork City to accommodate increased densities.** The density strategy is ambitious and establishes density ranges for different kinds of locations based on 8 different 'suitabilities'.

The strategy reflects national planning guidance, a bespoke analysis of Cork City and international best practice in relation to policy and models of development. 'Suitabilities' for urban density include:

- Identification as a major development opportunity;
- **Being within or close to an urban centre;**
- **Access to high-quality public transport proposed in CMATS (the proposed Cork LRT system, high-quality bus network and bus network);**
- Access to local services; and
- Access to parks and green space

3.25 **Greenfield sites will need to be developed to densities that reflect their suitability for urban density. This will require a step-change in the urban density of schemes being proposed.** As a general rule the minimum density shall be 35 dwellings per hectare (net density), excluding one-off houses." [Our Emphasis]

**"Objective 3.4 Compact Growth** Cork City Council will seek to ensure that at least 66% of all new homes will be provided within the existing footprint of Cork. Cork City Council will seek to ensure that at least 33% of all new homes will be provided within brownfield sites in Cork;

Optimising the potential for housing delivery on all suitable and available brownfield sites will be achieved by...

**b. Progress housing and employment delivery in urban centres and strategic regeneration sites...**

**d. The redevelopment of surplus utility and public sector owned sites;**

**e. The development of small and infill sites and the re-use of existing designated and undesignated built heritage assets including those on development sites;**

**f. The utilisation of planning and urban design tools to provide a framework for the development of sites (e.g. master planning, framework plans, neighbourhood strategies, historic area regeneration strategies, site specific briefs);**

**g. Optimising the use of land (see Objective 3.5: Residential Density);**

**h. Establishing ambitious and achievable build-out rates at the planning stage to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value...**

**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)".** [Our Emphasis]

The *Development Plan* strongly encourages the development of housing within the footprint of existing urban centres, to make use of underutilised sites that have good connections to public transport.

The Plan outlines a keen preference for the development of vacant sites within Cork City and its suburbs for housing, in particular. The Council aims to achieve the set housing targets and views developments that support compact growth in a positive light generally.

***“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 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;***
- d. Ensuring high-quality architectural, urban and public realm design. Guidance is set out in Chapter 11: Placemaking and Managing Development;***
- e. 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 (please refer to Chapter 11: Placemaking and Managing Development for those standards);***
- f. Deliver at least 20% below-market priced housing across Cork City and ideally within each new residential neighbourhood;***
- g. 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.” [Our Emphasis]***

As the subject site is located within Wilton, the objectives and policies underpinning residential development in this area are of the utmost of relevance in this case. The *Development Plan* states the following regarding residential density in the Wilton area;

***“Whilst sensitivity to tall buildings is particularly high on the western city fringe, this is also the most densely developed part of the zone with existing neighbourhoods rising to 100 dph and above;***

*The city centre forms part of the immediate context to the city fringe which also makes this area more appropriate to dense forms of development;*

*Beyond the city centre, the town centres of Mahon, Blackpool and Wilton are also within this zone. Mahon and Blackpool are precinct-based centres built around new road infrastructure. Wilton, whilst centred around a large shopping precinct, is a more integrated centre. With existing more suburban residential neighbourhoods*

***immediately adjoining these town centres, new development should typically range from 50 – 120 dph.*** [Our Emphasis]

This Report notes that higher densities are accepted in centres such as Wilton. It is our opinion that the proposed development broadly accords with the *Development Plan*, as the design of such is underpinned by the objectives outlined above.

In addition, importantly, the Allies and Morrison Report appended to the Development Plan states the following in relation to height and density;

***“This density and building heights strategy is not a blueprint. Each case should be considered on their merits, but this guidance is put forward to help ensure the very best use of urban land is made to meeting current and future acute housing needs. There will be instances, given a site’s particular context, where densities and heights lower or higher than those outlined in the strategy may be appropriate. Compliance with height and/or density guidance in this strategy does not alone justify densities or heights that might otherwise be considered inappropriate when assessed against other relevant planning policies or guidance.”*** [Our Emphasis]

The strategy notes at the outset;

***“The principal objective of this part of the strategy is to assess the entire administrative area against a series of criteria which combine to make locations more suitable for high density development. Factors including how well served any given location is by future or planned public transport, community infrastructure, access to shops and services, etc. The more criteria any given location meets, the more suitable that area is for higher density development.”*** [Our Emphasis]

We note the 8 no. criteria forming part of the density spatial strategy assessment, and how we believe we are in compliance with these criteria overleaf.



**Table 4.2.1 – Assessment of Performance Criteria for Increased Density When Applied to the Subject Site.**

<b>Criteria</b>	<b>Specific Requirements</b>	<b>Performance of Subject Site</b>
<b>1. Access To Services</b>	Areas within or immediately adjacent to the city centre or the city's district and neighbourhood centre or within the numerous identified local centres. A 400 m (5 minute walk) buffer around the network of Cork's district centres is included with the same buffer also placed around smaller neighbourhood centres.	The subject is within the 400m buffer of the Wilton District Centre. Please refer to Figure 4.2.4 below.
<b>2. Proximity To Community Facilities</b>	Within walking distance of community facilities. For the purpose of the spatial density strategy, priority was given to health and education facilities where a 400 m buffer has been applied. Other facilities have been allocated a 200 m zone around them.	The subject site falls within the specified buffers. The site is within 400 metres of the SMA Wilton Training Centre (which directly adjoins the site to the north) and Cork University Hospital, which is the primary teaching facility for University College Cork. It is the second largest employer in Cork City. In addition, numerous other community facilities are noted as being within the assessment buffer, such as childcare and daycare facilities in the SMA site adjoining to the north. A comprehensive Social Infrastructure Audit Assessment Report will also be submitted with the planning application. Please refer to Figure 4.2.5 below.
<b>3. Proximity To Green And Blue Infrastructure</b>	Within walking distance of the River Lee or identified open space. 800 m walking thresholds are defined around the River Lee corridor and open spaces of 5 Ha or more and a 400 m threshold around small identified open spaces have been mapped as part of the spatial density strategy.	The site is within the 400m specified buffer, due to the close proximity of the site to several identified green and blue infrastructure sites. These include the Glasheen River Walkway to the south of the site, Neenan Park to the east, Bishops court Park to the north-west, Summerstown Park to the east and numerous other public open space facilities in close proximity of the subject site. Please refer to Figure 4.2.5.

<b>4. Identified Areas</b>	<b>Opportunity</b>	Some locations have already been identified for potential housing growth in the Development Plan and/or CMATS strategy.	In CMATS, Wilton is identified on the Core Bus Corridor of Cork City to Bishopstown. The strategies proposed infrastructure updates are listed as follows;  Improved cycle infrastructure; Improved bus routes; Introduction of the Light Rail System  The subject site is within a <8 no. minute walk of the nearest bus stop identified as being part of the 'Core Bus Corridor' route noted in CMATS on the Bishopstown Road. In addition, it within a <3 no. minute walk to the high-frequency bus services available via the Sarsfield Road. In spite of this, the subject site is not identified within the heat maps. Please refer to Figure 4.2.6 below, which also notes the planned bus services frequencies under Bus Connects. The Wilton area is planned to receive a number of new cycle routes, bus routes, and a light rail line in the coming years.
<b>5. Proximity To Railway Stations</b>		Regional and national services terminate in Kent Station, but other stations also serve the area.	The subject site is not in close proximity to any railway stations. We note that LRT is planned for CUH to the north and is now explicitly identified in the Cork Luas consultation (April 2025 – NTA + TII.)
<b>6. Proximity To High Frequency Bus Services</b>		These are defined as routes with bus frequencies of every 15 minutes or less. A threshold of 400 m along high frequency bus routes have been mapped.	As noted above under criteria No. 3, the subject site is in close proximity to a number of existing and planned high frequency bus routes, both existing and planned (via Bishopstown Road and Sarsfield Road). Please refer to Figure 4.2.7 accordingly.
<b>7. Proximity To 'Normal' Bus Services</b>		In addition to the high frequency routes, this area covers routes which benefit from regular but less frequent services. We have placed a 400 m walking zone around these service routes	As noted above, several other bus routes are accessible via the Sarsfield Road, directly adjoining the site to the east. Please refer to Figure 4.2.7 below.
<b>8. Proximity To The Planned Light Rail Transit (LRT)</b>		The Council are committed to the delivery of a Luas light rail service for Cork running at high frequency between Ballincollig and Mahon via Cork city centre. A high frequency 5 minute service is envisaged. Like heavy rail stations, an 800m zone is placed around the planned stations.	The subject site is identified as being within the specified buffer for the planned LRT system. It is noted that Cork University Hospital has been identified as a possible LRT stop location for the project. Please refer to Figure 4.2.8 below.

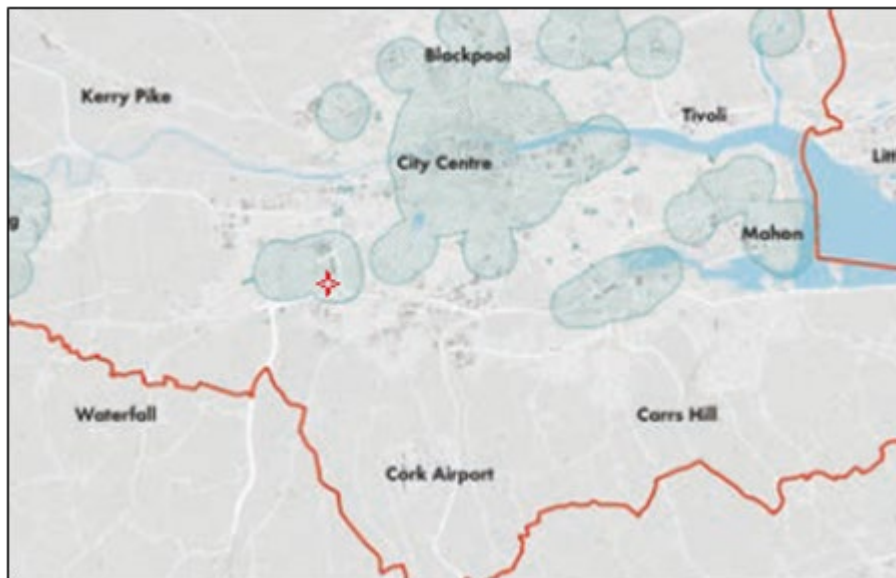


Figure 4.2.4 Extract of 'Access to Services Map,' to illustrate the subject site as being within the specified buffer. The subject site is noted indicatively with a red star [Source: A+M Study, cropped and Annotated by TPA 2025]

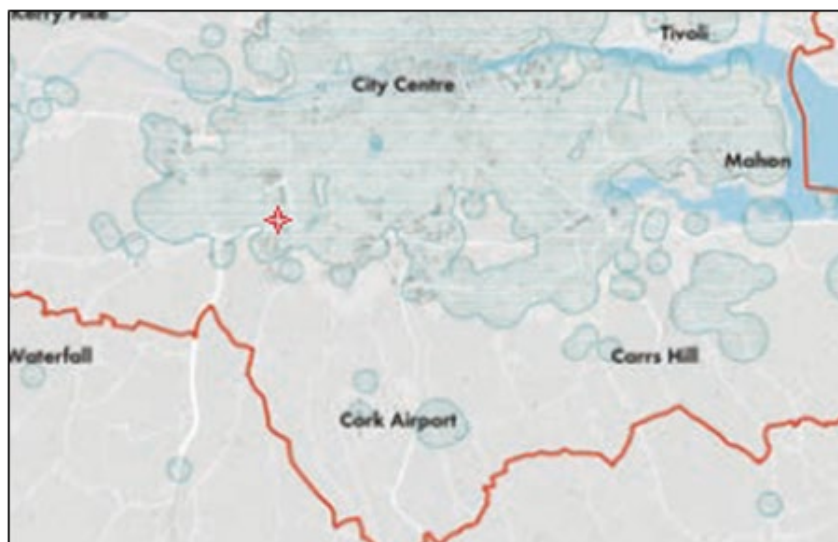


Figure 4.2.5: Extract of 'Proximity to Community Facilities Map,' to illustrate the subject site as being within the specified buffer. The subject site is noted indicatively with a red star [Source: A+M Study, cropped and Annotated by TPA 2025]

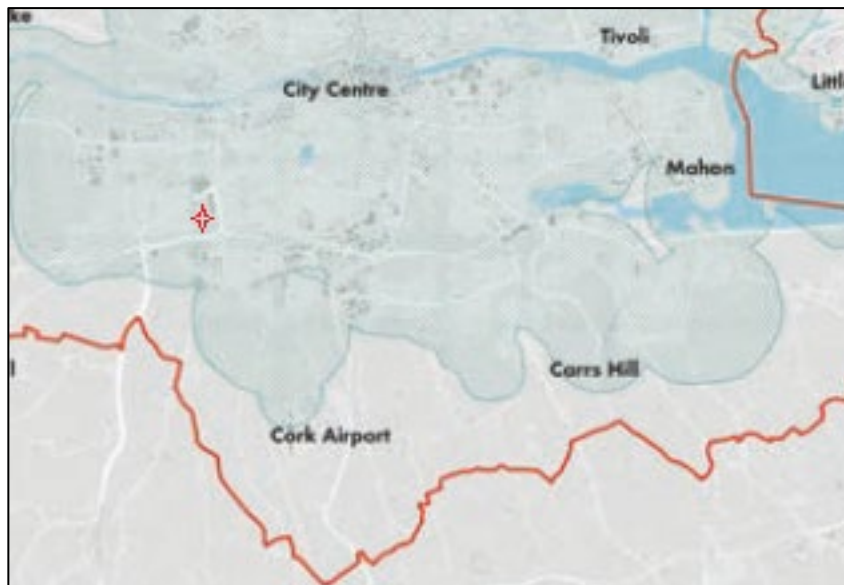
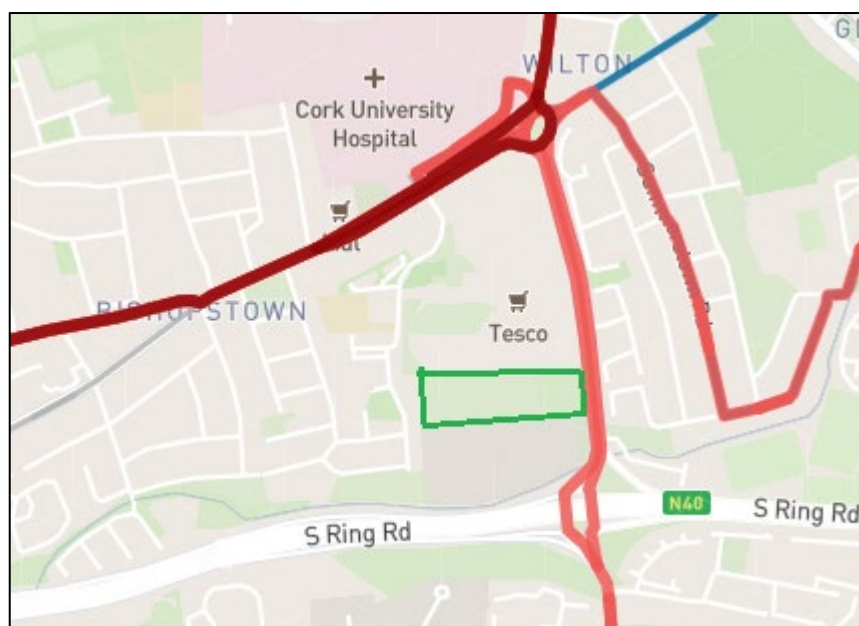


Figure 4.2.6: Extract of 'Proximity to Green and Blue Infrastructure Map,' to illustrate the subject site as being within the specified buffer. The subject site is noted indicatively with a red star [Source: A+M Study, cropped and Annotated by TPA 2025]



Some routes or segments are more frequent during peak periods.

Up to 10 min	10-15 min	16-20 min
21-30 min	31-60 min	120 min
Certain Times		

Figure 4.2.7 – Proximity of the site to the identified high frequency bus routes planned for the Wilton area, noted within Bus Connects and accordingly should be considered an opportunity area. The subject site is noted indicatively with a green outline [Source: Bus Connects and Annotated by TPA 2025]



Figure 4.2.8: Extract of 'Proximity to Normal Bus Services Map,' to illustrate the subject site as being within the specified buffer. The subject site is noted indicatively with a red star [Source: A+M Study, cropped and Annotated by TPA 2025]

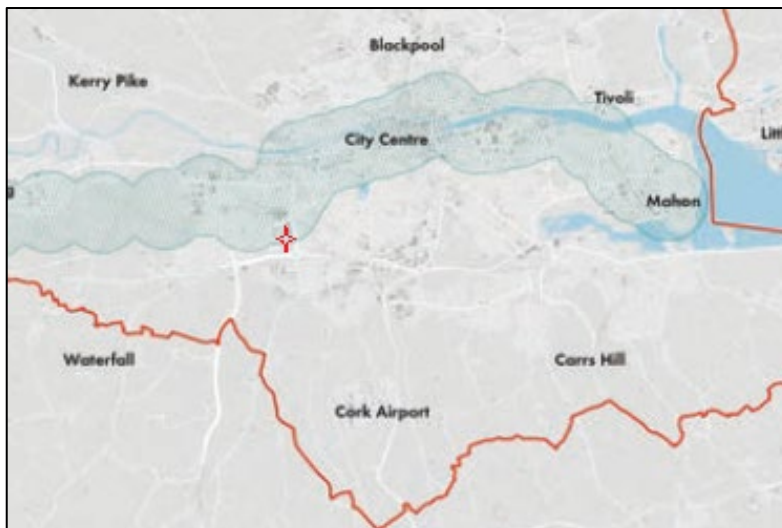


Figure 4.2.9– Extract of 'Proximity to Planned LRT Map,' to illustrate the subject site as being within the specified buffer. The subject site is noted indicatively with a red star [Source: A+M Study, cropped and Annotated by TPA 2025]

We note that the subject site is in compliance with 7 of the 8 no. specified criteria noted above and should, as a result, be considered for increased density. This is underpinned by wider policy support in the Study and the Development Plan itself for increased density in the Wilton area. This is also in line with the National guidance noted above. Accordingly, we believe that a material contravention *Development Plan* will not arise in this regard, in relation to the proposed density of the scheme.



The proposed development is an example of compact development, in a sustainable location, in close proximity of high-quality public transport and close to existing significant employment centres. The proposed density is above the specified density for the Wilton area; however, it is our opinion that this is appropriate given the context and location of the subject site and the other performance criteria noted in the *Development Plan*. We also note that CCC rezoned the site for residential development at the request of the LDA, amongst wider supportive policies in the *Development Plan* that ensures continuous engagement and collaboration with the LDA for the delivery of housing in Cork City. It is our opinion that the proposed development is in line with CCDP Objective 3.4 for Compact Growth, Objective 3.5 for Residential Development, and a number of other policies as outlined above.

## Height

The *Development Plan* outlines the definition of a 'tall building' in the City Fringe, Primary Corridors and Mass Urban Centres, stating a building may be considered tall when compared to the prevailing heights of the area and is equal to or more than twice the height of the prevailing building height in a specific locality. The Plan states the following;

*“City Fringe, Primary Corridors and Major Urban Centres:*

*11.37 Existing building heights typically range from 2 – 6 storeys in the city fringe and principal urban corridors, 2 – 5 in Mahon and Blackpool and 2 – 4 in Wilton.*

*To seek to ensure the best use of land is achieved, whilst responding to local context, new development should respect this context;*

*Definition of a Tall Building in Cork 11.45 - A tall building is defined as a building that is equal to or more than twice the height of the prevailing building height in a specific locality, the height of which will vary between and within different parts of Cork City;*

*11.52 - Tall buildings in other locations in the “City Fringe, Primary Corridors and Major Urban Centres” sub-area, which is for dense development that responds to mass transit provision, will be open for consideration insofar as the buildings might be tall compared to the prevailing heights of the area and therefore fall under the definition of tall buildings. The City Docks Tall Building Zones are the only locations considered appropriate for this densest form of development in Cork. [Our Emphasis]*

The Plan notes that tall buildings in other locations, such as city fringe, primary corridors, and major urban centres that taller buildings, which respond to mass transit provision will be open for consideration, insofar as the buildings might be tall compared to the prevailing context. The subject site falls within the 'inner urban suburbs' area and partially within the 'outer suburbs' areas. The Plan continues that;

*“Cork City Council has identified five locations that are considered suitable for landmark medium rise buildings, generally between 10 and 14 storeys, based upon the suitability of locations for higher density, being either regeneration areas or areas with strong suitability due to the proposed LRT corridor. These are Blackpool, Tivoli Docks, Victoria Cross, Mahon and Wilton.” [Our Emphasis]*



It is our opinion the proposed building heights are appropriate to the subject site and are in keeping with the recent pattern of existing and permitted development within the wider vicinity. We also note that the prevailing height assessment of the area in the *Study*, does not account for the pattern of permitted development, namely the Wilton Shopping Centre development adjoining the subject site.

We note the criteria forming part of the height strategy assessment for height are duplicated from the Density section above, so are again applicable in this instance, and accordingly we believe we are in compliance with 7 out of 8 no. stated criteria. The Study does, however, note 5 no. 'sensitivities criteria for height.' This is noted in the Study;

*"It is recognised that some criteria represent issues that are likely to be considered more sensitive than others. Assessing the relative level of importance between different criteria is a qualitative exercise. Each criteria has been attributed a relative level sensitivity on a scale of 0-5 where 0 is not sensitive and 5 is highly sensitive."*

These are assessed against the subject site below.

**Table 4.2.2– Assessment of Sensitivities Criteria for Increased Height When Applied to the Subject Site.**

Criteria	Specific Requirements	Performance of Subject Site
<b>1. Architectural Conservation Area</b>	A total of 39 ACAs are currently designated across the city of Cork. New development within ACAs is controlled under Objective 9.32 of the adopted Development Plan. ACAs seek to recognise the special architectural character of an area. New development will inevitably impact on this special character and new tall development in ACA is likely to raise particular concerns given the associated visual impact. Beyond the city centre, this dataset also includes Historic Street Character Areas which include a number of older residential areas outside of the City Centre. Similar to ACAs, the areas have street frontages and groups of buildings of architectural and social interest in terms of their group value, building volume, roof pattern, and elevation treatment.	The subject site is not within an identified ACA.

<b>2. Protected Buildings and Structures</b>	<p>The Record of Protected Structures (RPS) includes buildings or structures which the Local Planning Authority consider to be of special architectural, historical, archaeological, artistic, cultural, scientific, or social or technical interest. Special regard needs to be had to the desirability of preserving the protected building or its setting or any features of special architectural or historic interest which it possesses. Preservation in this context means not harming the interest in the building, as opposed to keeping it utterly unchanged. It should be noted that city-wide mapping is not the optimum tool to express and define the extent of any such sensitivity as the distribution of protected structures is point data and does not map the area around any given building or structure where new development might materially impact on its setting. However, the mapping analysis undertaken flags the importance of listed buildings and presents an image of their widespread distribution right across the city's administrative boundary.</p>	<p>There are no noted protected structures within the subject site and the lands are not within the setting of a protected structure. It is noted that Wilton House and Outbuildings (SMA House), St Joseph's Church and Wilton Park House (Cardinal Court) are listed as protected structures in the <i>Development Plan</i>, which are in the wider area. A Landscape and Visual Impact Assessment has been prepared as part of the city-planning application, with viewpoints included in respect of protected structure locations. No adverse impacts are expected in this regard. In addition, an Archaeological Impact Assessment has been prepared, which notes that it is expected that there are no archaeological sites within the site area. The nearest is c. 935 m from the site boundary, so no impacts are expected in this regard.</p>
<b>3. Views and Prospects</b>	<p>Cork City benefits from the prominent ridges which provide a series of striking viewing points of the city. This important resource helps to define the character and identity of the city. The adopted development plan defines five types of views in Cork: linear views of landmarks; panoramic views; river prospects; townscape and landscape features; and approach road views. Each view corridor has been mapped and is included in the sensitivity assessment.</p>	<p>St. Joseph's Church, Wilton is identified as a local landmark building in the View Management Framework mapping, however no associated views or prospects are noted associated with this structure. As noted above, no adverse impacts are expected in this regard.</p>
<b>4. Neighbourhoods with a very consistent prevailing height</b>	<p>Box-plot analysis has been undertaken of building heights across each of Cork's identified neighbourhoods. This reveals areas characterised by particularly consistent building heights. These areas of consistent height are considered to be particularly sensitive to the impact of tall or taller buildings and are therefore included in this analysis.</p>	<p>It is noted the prevailing heights within the area range from 2 no. storeys to 4 no. storeys, however, the <i>Development Plan</i> identifies Wilton as an area with the capacity to facilitate growth within the lifetime of the Plan. We also note the previously permitted development adjoining the subject site, which allows for a 7 no. storey redevelopment of the Shopping Centre. In addition, Cork University Hospital is noted as currently being 6 no. storeys in height.</p>

<b>5.Flight Path</b>	Flight path data associated with the approach and take-off flight paths for Cork Airport have been included in this analysis.	While within the identified flight path of Cork Airport, we note that tall buildings, located at a higher datum within the flight path have previously permitted to the north of the site in the Wilton area, to the north of the subject site in the Wilton area, as noted above. This includes both the Wilton Shopping Centre and Cork University Hospital. This is discussed further in the following section, and we note no adverse impacts are expected in this regard.
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We note at the subject site accords with all 5 no. specified sensitivities criteria for increased height and should, as a result, be considered for increased building height at this location. This is underpinned by wider policy support in the *Study* and the *Development Plan* itself for increased height in the Wilton area. Accordingly, we believe that a material contravention *Development Plan* will not arise in relation to the proposed height of the scheme and that the proposed maximum height of 6 no. storeys should be deemed acceptable in this regard. Please refer to the enclosed pack prepared by Reddy A+U for further height and context rationale information.

### Apartment Design Standards

The Plan acknowledges that in the coming years, apartments will form a greater portion of the housing market, further acknowledging that apartment schemes will be key for achieving higher densities that will aid in reaching the projected housing targets outlined in the Plan. These are outlined briefly below.

#### Quantitative Standards

Chapter 11 of the *Development Plan* outlines several design standards for apartments. Section 11.91 outlines quantitative standards based on national guidance as outlined in *Sustainable Urban Housing: Design Standards for New Apartments*. The proposed development's compliance with this document is outlined in detail in Section 4.1.7 of this Report.

#### Qualitative Standards

Section 11.92 sets the qualitative considerations for apartment schemes. The following is stated;

1. "Communal space within schemes should benefit from excellent daylight and sunlight that exceeds the minimum standards (the scheme layout and volumetric configuration of buildings should optimise solar gain to all spaces). Where daylight and sunlight are at minimum standards, this should be supplemented by rooftop communal amenity space;
2. Communal space is equally accessible to all residents and is tenure blind;

3. *Rooftop spaces should be put to productive use for either: green roofs, blue roofs, solar energy, communal rooftop gardens, communal MUGAs, or communal allotments;*
4. *Green and blue roofs should be designed according to best practice (e.g. Living Roofs and Walls, GLA ,2008)”.*

A *Daylight and Sunlight Report* prepared by GIA is submitted with this planning application. The Report conducted an overshadowing assessment of communal open spaces using the methodology set out in the BRE guidance for Sun Hours on Ground (SHOG) for all relevant amenity areas. The Report outlines that the four proposed communal open spaces perform exceptionally well and exceed the BRE recommendations.

The layout and design of the proposed development ensure that communal open spaces are accessible for all apartment owners within the site, and this is outlined in the *Architectural Design Statement* prepared by Reddy Architecture and Urbanism.

The proposed development includes the provision of green roofs, this is outlined in further detail in the landscape and architectural packs submitted with this planning application.

Section 11.93 of the Plan outlines that planning applications for residential developments must submit a schedule that details the number of apartments and associated areas. In line with the *Development Plan*, a *Schedule of Areas / Housing Quality Assessment* prepared by Reddy Architecture and Urbanism is submitted with the planning application.

#### *Sunlight and Daylight*

Section 11.95 of the Plan states a daylight analysis will be required for all proposed developments of more than 50 units. Objective 11.4 states the following;

#### ***“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 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”.*

In line with Objective 11.4 of the Plan a Daylight and Sunlight Report prepared by GIA is submitted with this planning application and notes cumulative impacts in this regard. For further information please refer to Section 5.12 of this Report and the accompanying documentation accordingly. We note that no under overshadowing impacts is noted in relation to adjoining properties.

#### *Separation, Overlooking and Overbearance*

Sections 11.100 – 11.105 of the Plan outlines standards regarding Separation, Overlooking and Overbearance for new apartment schemes. The Plan states that the previous requirement for separation distances (c 22m) is no longer in keeping with best practice. The Plan outlines there is no minimum requirements separation distances for apartment schemes. This is dependent on the applicant's ability to outline the proposed separation distances are appropriate and there is to be no negative impact on residential amenity.

The Architectural Design Statement prepared by Reddy Architecture and Urbanism states the following;

*"Sufficient and compliant separation distances are provided between the proposed development and existing structures outside the site, such as Cardinal Court to the west, ESB Networks to the south and Wilton Shopping Centre to the north;*

*Townhouses within the site are between 23m to 37m from any existing houses in Cardinal Court;*

*The apartment blocks are also sufficiently distanced from any existing neighbouring structures so as to avoid any concerns regarding privacy and overlooking". [Our Emphasis]*

The proposed development has been carefully designed in order to protect the existing residential amenity of the adjoining residents of Cardinal Court. Ample separation distances are provided in this regard, as noted in Figure 4.1.1.2. We submit that the layout and sitting of the apartment blocks and townhouses have ensured that there is no undue overlooking or overbearance to the neighbouring residential premises. For further information please refer to Section 4.1.5 of this Report and the accompanying documentation Prepared by Reddy Architecture and Urbanism.

#### **Housing Design Standards**

Section 11.106 *Development Plan* outlines design standards for new housing developments, these are outlined in further detail below.

##### ***"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. The following factors will be material in assessing whether adequate space has been provided:*

- a) The density of the proposed development;*
- b) The context of the development in relation to the size and layout of existing residential plots and the pattern of development;*
- c) The orientation of the outdoor area in relation to the path of the sun;*
- d) The degree to which enclosure and overlooking impact on the proposed new dwellings and any neighbouring dwellings;*
- e) The overall shape, access to and usability of the whole space to be provided;*
- f) Clear delineation of public and private space (avoiding rear boundaries onto streets and public realm);*
- g) The location of the plot in relation to publicly accessible open space and the offer of that space”.*

The majority of the townhouses have a provision of private amenity space of 48 sqm or more. It is to be noted that 3 no. townhouses are marginally below 48 sqm (43.9, 44.5, and 46.5 sqm).

However, as previously stated 3,545 sqm of public open space is to be provided amounting to a provision c. 10 sqm per residential unit when applied to the overall scheme (348 no. residential units). There is a dedicated square proposed to be located directly in front of the townhouses comprising seating, play areas, and landscaping. This was designed to ensure the residents of the townhouses have immediate ease of access to open space in addition to the open space provided throughout the site. In addition, Table 11.11 of the Plan states a general provision of 10% for open space for residential developments. It is to be noted that the proposed development includes 3545 sqm (13.1%) of public open space.

Therefore, we are of the opinion that the provision of high-quality quality communal open space offsets the marginal under provision the 3 no. townhouses. For further information please refer to the accompanying documentation prepared by Reddy Architecture and Urbanism.

### **Aviation Impact**

Cork Airport is located c. 3.4 km to the southwest of the subject site. A review of the CCDP Cork International Airport Zones was undertaken as a part of this Report. The subject site is identified to be located within the following;

- Obstacle Limitation Surface – Inner Horizontal Surface (Elevation 187m);
- Approach Surface – Runway 17;
- Public Safety Zone – Outer;

Whilst from the onset it was not envisioned the proposed development would pose a negative impact to the surrounding zones. However, the Applicant has retained O'Dwyer + Jones Design Partnership to assess the proposed development.





Figure 4.5: Public Safety Zone Map, with subject site noted indicatively with a red star, [Source: Cork City Development Plan Allies and Morrison Report, cropped and annotated by TPA, 2025]

The planning application is accompanied by an Aeronautical Assessment Report, prepared by O'Dwyer + Jones Design Partnership. The Assessment outlines that the proposed development will comply with all aviation and aeronautical requirements affecting the site. The investigations show that the proposed development is not at any significant risk, nor will impact the helipad at CUH or the activities of Cork Airport.

### Unit Mix

In this section, we address the proposed unit mix in the context of Cork City Council's development requirements, as specified in the *Cork City Development Plan 2022–2028*. While the proposed scheme deviates from the prescribed unit mix for the South-Western Suburbs, the rationale for this deviation is supported by detailed market analysis and aligns with national guidelines for sustainable urban housing, particularly the Sustainable Urban Housing: *Design Standards for New Apartments – Guidelines for Planning Authorities (2023)*.

The proposed scheme's predominant focus on one- and two-bedroom apartments addresses the acute demand for smaller, more affordable rental units in the Wilton area. Supported by demographic and market evidence, including the enclosed Demand Analysis Report, prepared by Savills, this section demonstrates that the unit mix responds directly to the unique characteristics of the local catchment area.

These include a younger, highly educated population, a high proportion of smaller households, a significant shortage of rental accommodation, and the presence of key employment hubs such as Cork University Hospital (CUH), Munster Technological University (MTU), and University College Cork (UCC). Affordability of rental properties in the Wilton area, is also outlined. Wilton's population is younger than average, with 32% aged 20–34 compared to 18% nationally, and is characterised by smaller households, with 57% comprising one- or two-person units. This combination of high demand, limited supply, and affordability challenges underscores the urgent need for affordable one- and two-bedroom units in the Wilton area.

This section also highlights the exceptional circumstances that justify the proposed unit mix, particularly in the context of delivering a cost rental scheme. This approach not only ensures compliance with national guidelines but also addresses critical affordability and housing supply challenges in Cork City, providing sustainable housing solutions for middle-income households unable to access social housing or afford private market rents. This is in line with the role of the Land Development Agency, which is to provide for social and affordable housing, on state owned land, as per the *Land Development Agency Act (2021.)*

#### Unit Mix in the Development Plan

As noted above in Section 4.1.7, the relevant national guidance for unit mix is the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2023*, SPPR1 and SPPR2 of the Guidelines outline standards regarding a residential development's unit mix. As outlined in Section 4.1.7 of this Report, SPPR1 states that a residential development may provide up to 50% 1 no. bed apartment units and there is to be no minimum requirement for the provision of apartments with 3 no.+ bedrooms.

In summary, based on the information and research provided, as well as evidence of market demand, we believe that the proposed development, which constitutes a cost rental and AFS scheme, which is in critically short supply in Cork City, represents an exceptional circumstance that justifies deviating from the Unit Mix specified in the *Cork City Development Plan (2022-2028)*. Again, we note that the proposed unit mix aligns with current national guidance for sustainable apartment development and reflects the needs of the area's population. In conclusion, the unit mix is market-driven, policy-compliant, and financially sustainable, addressing Wilton's acute housing needs while supporting sustainable urban development.

The scheme comprises:

Quantum	Unit Type	Percentage %
16	3-bedroom townhouses	4.6
152	1-bedroom apartments	43.7
168	2-bedroom apartments	48.3
12	3-bedroom apartments	3.4

**Table 4.2.3 – Proposed Unit Mix. The combined total 3-bedroom units equate to 8% overall.**

As noted, the proposed development is located in Wilton and identified to be in the 'Southwestern Suburbs' under the Plan. The *Cork City Development Plan 2022-2028* outlines expectations for residential developments within the City Suburbs. Table 11.8 of the *Development Plan* states the following regarding city suburbs dwelling size mix for housing developments.

**Table 4.2.4 City Suburbs Dwelling Size Mix for Housing Developments [Source Table 11.8 - Cork City Development Plan 2022-2028]**

	Min	Max	Target	Proposed Scheme
Studios/PBSA (at LRT Stops/Urban Centre/HEI Campus Only)	0%	15%	10%	None Proposed
1 Bedroom	15%	25%	20%	43.7%
2 Bedroom	25%	40%	34%	48.3%
3 Bedroom	18%	38%	28%	8% (combined houses and apartments)
4 Bedroom/Larger	5%	15%	8%	None Proposed

While the proposed development is not strictly in line with the *Development Plan's* unit mix standards for the City Suburbs, the Plan states that there are exceptions, which we believe are applicable in this instance. In the instances where a proposed development does not comply, the Applicant is requested to provide a rationale based on market evidence to support the proposed unit mix:

***“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”.*** [Our Emphasis]

Accordingly, a justification of applicable exceptional circumstances and a justification on the basis of market evidence has been compiled as a part of this Statement of Consistency below, and in the accompanying *Demand Analysis Report*, Appendix B.

At the outset, it is worth noting that the proposed development is not a standard private residential development application, which would usually be expected to strictly conform with the above unit mix requirements. The exception relates to the fact that the proposed development is predominantly to provide a significant Cost Rental scheme in Cork City, applied for by the Land Development Agency. At present, very few Cost Rental units exist at present within the Cork City Council area.<sup>4</sup>

<sup>4</sup> At present Lancaster Gate (Clúid Housing – 73 no units), Railway Apartments (Cork City Council – 169 no. units) and Glanmire (Respond – 32 no. units) are the known Cost Rental/Affordable schemes in Cork City. Of this 105 no. are known to be operational.

In addition, it is important to emphasise that all the assumptions regarding housing demand are based on outdated information and, therefore, cannot be strictly relied upon in this instance. *The Cork Joint Housing Strategy and HNDA (2022-2028)*, as detailed in Section 4.2.1 - Calculated Demand, was developed to fully align with the *National Planning Framework (NPF)*, published in 2018, and its associated population and household scenarios. Initially, the NPF aimed to guide the future development of Ireland, projecting a need for c. 550,000 more homes by 2040 to accommodate a population increase of 1 million and the creation of 660,000 additional jobs by 2040. However, it has become clear that these conservative estimates did not properly account for a combination of factors, including inward migration to the county. This has underrepresented the significantly increased the housing demand, particularly in the short to medium term. These issues have contributed to the discrepancy between the original NPF projections and the current housing needs. It is now envisaged, according to the ESRI, that this 1 million increase is more likely to occur by 2030.

The *Draft Revised National Planning Framework (July 2024)* has proposed a draft target for delivering housing to accommodate approximately 50,000 additional households per annum until 2040. This represents a significant increase over the assumptions that informed the housing targets for Cork City. Accordingly, the figures as outlined in the *Cork Joint Housing Strategy and HNDA (2022-2028)*, significantly underrepresent both existing and future demand in the area.

The market evidence, and associated justification of an exceptional circumstance is outlined in greater detail overleaf.

#### *Role of the Land Development Agency (LDA) in Providing Social and Affordable Housing*

The LDA is a commercial, State-sponsored body that seeks to maximise the supply of affordable and social homes on public and other land in a financially sustainable manner, supporting the creation of thriving communities and delivering ongoing positive social impact.

*The Land Development Agency Act (2021)* established the LDA with the power to pursue a wide range of activities to deliver its mandate, including managing and developing public and acquired land, and collaborating with other parties for the delivery of housing.

Under the provisions of *Section 75(4) of the Land Development Agency Act (2021)*, it is required that 100% of dwellings delivered by the LDA within population centres greater than 150,000 (i.e. Cork and Dublin) shall comprise of social and affordable homes. Accordingly, the proposed development complies with this requirement, where 100% of the units applied for will comprise of social and affordable homes. Further information about Cost Rental development is provided below.

#### *Cost Rental Development*

Cost Rental is a new housing tenure that was created under the *Affordable Housing Act (2021)*. It offers a long-term, secure rental option that will contribute to the development of a sustainable housing market in Ireland which provides choice across all tenures. The rent on these units is based on the cost of building, managing, and maintaining the homes.

Cost rental housing provides affordable accommodation for middle-income individuals who do not qualify for social housing, but struggle to afford private rents. It is called ‘*cost rental*’ because the rent you pay is based on the cost of building, managing and maintaining the homes. It does not include any profit for a developer. This makes the rent cheaper than standard rents. The rent for cost rental homes must be at least 25% below regular market rents in an area.

To qualify for cost rental housing in Cork City, applicants must meet the following criteria:

- Income Cap: Net household income must not exceed €59,000 per year.
- No Social Housing Support: Applicants must not be receiving any social housing support, such as the Housing Assistance Payment (HAP).
- Property Ownership: Applicants must not own a property.
- Household Size: The household size must align with the property size. For instance, a two-bedroom unit may be suitable for two adults, a couple, or a lone parent with one or more children.
- Affordability: Applicants must be able to afford the rent for the property.
- Application Limit: Each household can apply only once for a specific cost rental property.
- Residency: All members of the household must be residing in Ireland at the time of application.

Although the income cap of €59,000 ensures affordability, it presents challenges for unit types of three-bedrooms or more. These units typically require the highest rents, making them the first to exceed the cap. Additionally, their larger size makes them the most expensive to build. This combination of rent limits and higher construction costs particularly affects the viability of delivering these units in city centre locations, where rents are higher than in suburban areas.

As cost rental is a relatively new tenure type in Ireland there is limited “*on the ground*” information and data available on existing provision. The following statistics are based on the letting up of LDA schemes nationally to date.

Currently, approximately 4% of LDA tenancy applications are successful in meeting the criteria and securing tenancies. Of apartment schemes delivered, 16% of applications were for Studios, 35% of applications were for 1-beds and 48% were for 2 beds.

In the LDA’s experience the majority of applications for 3 bed units are from young professionals and couples with two or three adults applying together. As there are two or three incomes in the household these applications often exceed the net income cap and are therefore ineligible. This is also the case with some 2-bed units and in the LDA’s experience this is a growing trend.

Nationally at present 551 no. tenanted Cost Rental housing units are provided by the AHB sector, all of which were provided by Clúid Housing, Tuath Housing and Respond. Prior to the submission of the planning application, the Applicant reached out to the Housing Agency to inquire about the current number of operational Cost Rental units in Cork City. The Housing Agency confirmed that there are two Cost Rental schemes in operation, totalling c. 105 no. units.



These units are distributed between the city centre (about 73 no. units) and Glanmire (32 no. units). The Land Development agency is currently actively working to provide additional units, within a sector that is still in its infancy.<sup>5</sup>

Accordingly, the viability of 3-bedroom apartments in city centres is constrained under current Cost Rental parameters. When these units are unviable, their excess costs must be distributed across other, otherwise viable unit types within the scheme. This can jeopardise the financial feasibility of the entire project. Including too many 3-bedroom units may render the entire scheme unviable and ultimately undeliverable. This issue is even more pronounced in regional locations, such as Cork City, where lower net income caps exacerbate the challenge compared to Dublin.

The Housing Agency notes the following in their report, *The Impact of Cost Rental Housing: Security, Affordability and Place (2024)* in relation to the impact of provision of cost rental units;

*“The report’s findings presented in Chapters 4, 5 and 6, suggest that in many respects Cost Rental has had a very positive impact on residents’ wellbeing. **There is ample evidence that Cost Rental is meeting a previously unmet need within the housing system.** The overwhelming majority of residents had previously been in private rental accommodation before moving to Cost Rental. For many, it provides the opportunity for long-term security for those who cannot access homeownership but wish to have a ‘home for life’. Moreover, the qualitative interviews found that residents typically feel a strong sense of ownership and pride in relation to their Cost Rental homes. The sense of security which residents derive from Cost Rental is not only related to the formal security of tenure arrangements associated with the sector, but also to issues such as their control over the furnishing and other aspects of the dwelling, the quality of dwellings, and the landlord-tenant relationship. **There is clear evidence that access to secure rental housing, which has hitherto only been available to those in social housing, is a ‘game changer’ for many residents, and is associated with a variety of positive impacts.**”<sup>6</sup> [Our Emphasis]*

The non-provision of four-bedroom units ensures the scheme remains financially viable, as larger units are more expensive to build and less likely to meet affordability thresholds under the cost rental model. Instead, prioritising smaller units supports housing delivery at scale in a sustainable manner.

While feasibility is one of the factors in deciding on the suitable and sustainable unit mix for the proposed development within the Land Development Agency, an assessment of the local demographic profile, market demand, an assessment of existing housing stock are also key considerations outlined in this Report. It is clear from the analysis enclosed, prepared by Savills, that from a demand, supply and affordability perspective, that provision of cost rental and affordable 1 and 2-bedroom properties are desperately needed in Cork City.

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<sup>5</sup> The Impact of Cost Rental Housing: Security, Affordability and Place (2024), Section 2.2.

<sup>6</sup> The Impact of Cost Rental Housing: Security, Affordability and Place (September 2024), Ch1.



### Demand for Affordable Homes within Cork City

The Cork Joint Housing Strategy and HNDA (2022-2028) – Appendix 5.1: Supplemental Affordable Housing Assessment, provides an assessment of the projected affordable housing need between 2020-2028.

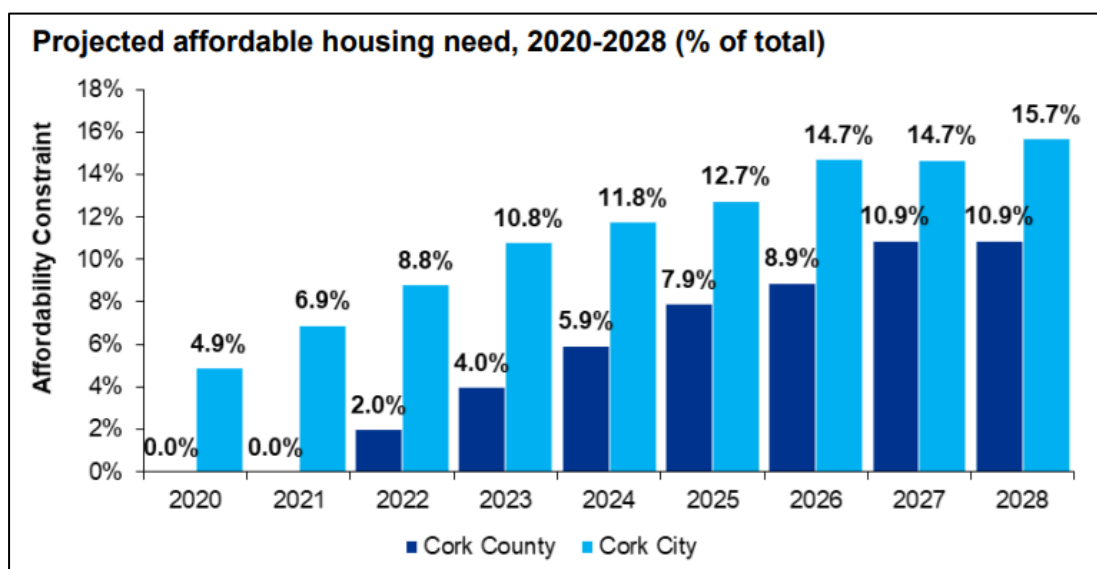


Figure 4.6 – Extract of The Cork Joint Housing Strategy and HNDA (2022-2028)

**Table 4.16: Number of additional anticipated households that do not qualify for a mortgage and cannot afford private rental during the strategy period**

	2022*	2023	2024	2025	2026	2027	2028*	Total
County Metro. SPA	179	357	357	357	357	357	179	2,144
Greater Ring SPA	116	232	339	339	339	339	169	1,873
North Cork SPA	66	133	133	133	163	163	82	873
West Cork SPA	65	131	131	131	131	131	65	784
Cork County*	427	853	959	959	990	990	495	5,674
Cork City	276	552	552	552	552	552	276	3,312

\*Sum of anticipated additional households unable to afford private rental in SPAs

Figure 4.7 - Extract of The Cork Joint Housing Strategy and HNDA (2022-2028)

Significant affordability challenges are anticipated in Cork City, with much of the rising demand for affordable housing expected to come from lower-income households. As incomes gradually increase, housing costs remain high, and more households surpass the €35,000 income threshold for social housing eligibility, shifting their needs from social housing to affordable housing.

As noted above in Figure 4.7, table 4.16 of the *Cork Joint Housing Strategy and HNDA (2022-2028)* estimates that 3,312 dwellings will be required to meet the needs of households facing affordability constraints. The proposed unit mix for financial viability and the current demand for specific housing tenures.

The planned scheme aligns with the objectives and future targets set out in the HNDA, addressing the needs of the population and the surrounding urban environment. It also prioritises the increased supply of one- and two-bed apartments, as emphasised in the both the Development Plan and the HNDA, which highlight the importance of diversifying Cork City's housing stock.

This underscores the urgent need for affordable housing over the next decade for those who do not qualify for social housing but cannot afford private accommodation. These households, classified as having "*affordability constraints*," require affordable tenure options such as Cost Rental or affordable purchase, particularly in Cork's high-demand housing markets.

#### Addressing Pent-Up Demand in Cork City

As noted above, at present, c. 105 no. cost rental and affordable units exist in Cork City. Section 5.4.4.4 of The *Cork Joint Housing Strategy and HNDA (2022-2028)* sets a population target of c. 42,543 no. persons by 2028 for the South-West Suburbs area, an increase of c. 2,316 or 6%, and a housing target of approximately 926 no. units. The area is also targeted for significant transport investment, particularly the proposed light rail line to Ballincollig and enhancement of existing high-frequency bus routes under Bus Connects. However, according to *Section 15(2) the Cork City Development Plan 2022-2028, Two Year Progress Report*, only c. 358 no. units have been completed to date, as per Figure 4.8 below.

LOCAL ELECTORAL AREA									
Local Electoral Area	2022	2022	2023	2023	2023	2023	2024	TOTAL	% Share
	Q3	Q4	Q1	Q2	Q3	Q4	Q1		
Cork City North West	56	85	45	111	37	35	74	443	22.6
Cork City North East	100	80	95	45	59	155	59	593	30.2
Cork City South East	43	74	32	109	6	81	19	364	18.5
Cork City South Central	69	27	9	8	29	24	39	205	10.4
Cork City South West	62	87	79	33	26	23	48	358	18.2
TOTAL	330	353	260	306	157	318	239	1,963	100

Source: CSO New Dwelling Completions (Table NDQ09: <https://data.cso.ie/table/NDQ09>)

Figure 4.8 - Extract of The Cork Joint Housing Strategy and HNDA (2022-2028)

This is notable in the context of an increasing population in the Wilton catchment area of 8.7% since 2011, as outlined in *Section 4.0 – Demographics* in the enclosed *Demand Analysis Report*, prepared by Savills, enclosed as Appendix B. This Report outlines specific demographic analysis for the Wilton catchment which further demonstrates the acute demand in the area.

### Age Demographics:

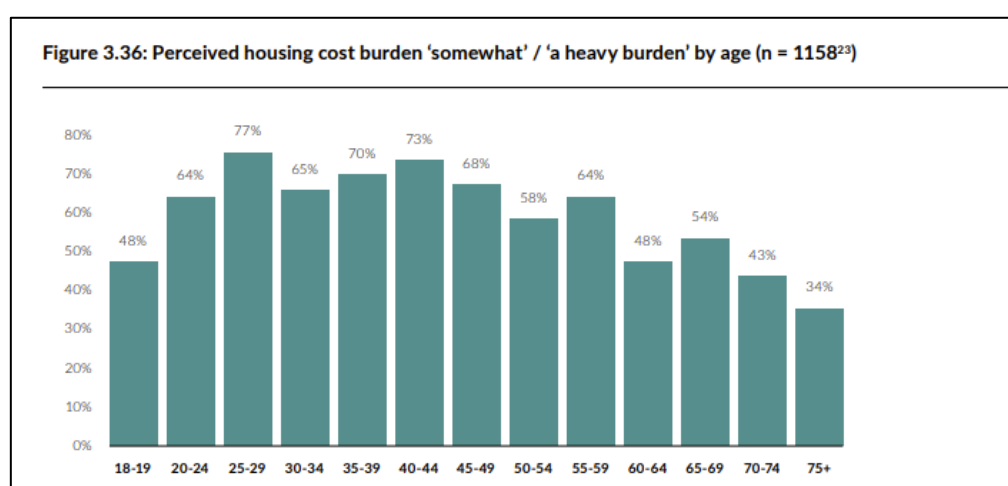
The Wilton area has a significantly higher proportion of residents aged 20–34 (32%) compared to 18% nationally and 17% in the South-West region. This age group predominantly comprises young professionals, who typically prefer smaller rental units such as one- and two-bedroom apartments. 56% of Wilton’s housing stock is being privately rented, over three times the national average (18%).

When analysed by age nationally, there were differences in the level of perceived housing cost burden experienced by different age groups. Householders aged 25-29 reported the highest levels of perceived housing cost burden (77%), followed by 73% of the 40-44 age group and 70% of the 35-39 age group. In contrast, one-third of householders aged 75 plus reported perceived housing cost burden was ‘somewhat’ / ‘a heavy burden’ (34%), the lowest proportion of all the age groups.<sup>7</sup>

### Affordability Challenges:

The Report notes that Cork’s median annual earnings, equate to c. €2,800 net per month. When compared to the private rental market average rents in Cork City, which are noted at c. €2,000 per month, the affordability challenge for many in the area is clear. This is evidenced within the National Study of Housing Experiences, Attitudes and Aspirations in Ireland- 2024 prepared by The Housing Agency.

The report which provides an assessment housing cost burden experienced by different age groups and finds at householders aged 25-29 reported the highest levels of perceived housing cost burden (77%) with 64% of those aged 20-24. Figure 3.36 of the report prepared by The Housing Agency, has been reproduced below.



**Figure 4.9 – Extract of Housing Agency Report – Noting perceived housing cost burden by age cohort.**

<sup>7</sup> National Study of Housing Experiences, Attitudes and Aspirations in Ireland Residential Satisfaction in Ireland 2023, The Housing Agency, Pg 21.

As of January 2025, just 3 no. available properties are noted in the Wilton area. None of these properties are apartments. 17 no. properties in total are noted as being available in Cork City in total. Trends noted of rising rent costs in the city, combined with largely stationary wage growth is exacerbating affordability issues in the area. This further reinforces the requirement for substantial provision of cost rental units in the area.

#### **Household Size and Composition:**

Smaller households dominate the Wilton catchment, with 33% being two-person households (4% higher than the South-West average) and 24% being one-person households. These figures suggest strong demand for smaller housing units.

#### **Prevalence of Apartments:**

Apartments account for 26% of the housing stock in the Wilton area, compared to 9% in the South-West region and 12% nationally. This highlights the area's existing suitability for apartment living.

#### **Significant Employment Drivers Present:**

Wilton is home to major employment drivers, such as Cork University Hospital (CUH), Munster Technological University (MTU), and University College Cork (UCC), which collectively employ nearly 10,000 people. These are all within close proximity of the subject site. It is also in relative close proximity to Cork City Centre. Many of these employees are likely to be young professionals, requiring accessible and affordable rental accommodation close to their workplaces.

#### **Rental Market Shortage:**

As of January 2025, only three rental units were available in the Wilton area, with no apartments among them. This severe undersupply of rental accommodation exacerbates the need for one- and two-bedroom units to address the demand from young professionals.

#### **Educational Attainment:**

Half of Wilton's population holds a bachelor's degree or higher, surpassing the national average of 29%. This indicates a highly educated workforce, consistent with the demand for high-quality rental units suited to young professionals.

These statistics clearly demonstrate that Wilton, as an employment hub, with a younger demographic and high demand for rental properties, is an ideal location for delivering one- and two-bedroom apartments to cater to the existing pent-up demand for this form of development, from young professionals in the area. In addition, the number of one and two-person households is significantly larger than the number of three and four-person households according to current available data. This discrepancy highlights a supply versus demand issue, as the predominant housing types available in the area are three and four-bedroom traditional suburban houses. It is clear that affordability challenges exist in Wilton due to high rental costs, a severe shortage of rental supply, and a reliance on the private rental market. These factors support the justification for a higher provision of one- and two-bedroom apartments to accommodate young professionals in the Wilton area, and the under provision of 4 no. bedroom units in this regard.

Further information on existing housing size and typology are outlined in greater detail in the enclosed Savills Report, under Appendix B.

There is a distinct need for housing tenure that includes cost rental and Affordable for Sale (AFS) elements within the Cork City South-West Suburbs, where such developments largely do not exist at present. The proposed development aims to address recent demographic statistics and create housing that meets the population's needs. Suitable properties for younger working individuals are limited. This issue is underscored by recent data from Daft.ie<sup>8</sup>, which reports that the average rent in Cork City has risen to €2,000 per month, marking an 11.9% year-on-year increase. This is the first instance of rents surpassing the €2,000 threshold in Cork City, one of four Irish cities experiencing double-digit annual rent growth. The sharp increase in rental prices is driven by a severe shortage of available rental properties, exacerbating the housing crisis in the city, with just 3 no. properties available in the area in January 2025.

In particular, the Wilton area faces a severe imbalance between high demand for rental properties and limited supply, contributing significantly to rising rental prices. The Daft.ie report highlights constrained supply and rising demand, particularly in cities like Cork, as key factors putting upward pressure on rental prices. This is compounded by broader market pressures for smaller unit sizes to accommodate single people and couples working in local employment centres such as CUH, MTU, UCC, the Wilton Shopping Centre, and Cork City Centre.

It is essential to address the imbalance between houses and apartments in the city and metropolitan area, following the principles of planning and sustainable development outlined in national documentation. Houses, which typically offer more bedrooms but are lower density than apartments, represent a less sustainable form of development if fully applied to this site. This consideration is particularly relevant for the site, an infill suburban location that is well-served and has strong public transport connections. The wider Wilton/Glasheen/Bishopstown area, historically characterised by low-density, semi-detached, and detached housing, further supports the development of apartments with a lower bedroom mix, as per the enclosed Savills Report.

Again, it is important to note that the *Cork Joint Housing Strategy and HNDA (2022-2028)* figures for Cork City are likely unreliable at this stage, due to outdated population assumptions.

The proposed unit mix is justified as it directly addresses the specific housing demand, demographic trends, and affordability challenges in Cork City, particularly in the Wilton area. While the scheme deviates from the Development Plan's unit mix targets, it aligns with national planning policy and provides an accurate reflection of the reality of the housing market and demand evidence in Cork City.

<sup>8</sup> The Daft.ie Rental Price Report – An Analysis of Recent Trends in the Irish Residential Market 2024 Q2

Wilton faces a severe undersupply of rental properties, despite being a key employment hub with a high concentration of young professionals, smaller households, and a reliance on private rental accommodation. The proposed provision of one- and two-bedroom units responds to the clear demand for smaller, affordable homes, while the non-provision of four-bedroom units is supported by the availability of larger homes in the surrounding area and the reduced demand for such units locally. Additionally, under the Cost Rental model, limiting larger units ensures the scheme remains financially viable, avoiding breaches of income eligibility caps.

In summary, based on the information and research provided, as well as evidence of market demand, we believe that the proposed development, which constitutes a cost rental and AFS scheme, which is in critically short supply in Cork City, represents an exceptional circumstance that justifies deviating from the Unit Mix specified in the Cork City Development Plan (2022-2028). Again, we note that the proposed unit mix aligns with current national guidance for sustainable apartment development and reflects the needs of the area's population. In conclusion, the unit mix is market-driven, policy-compliant, and financially sustainable, addressing Wilton's acute housing needs while supporting sustainable urban development

### **Mobility Management**

The primary consideration, when assessing a suitably car parking strategy, is the *Development Plan* requirements. The *Development Plan* notes that the parking requirement of a site dependent on the determined density of the site. In Chapter 4 'Transport and Mobility' of the *Development Plan*, the parking management standards for Cork City are addressed.

This is further outlined below;

*"4.102 Cork City Council has been guided by the provisions of and the anticipated roll out of CMATS in determining new Parking standards for the City and the Urban Towns;*

*4.103 The Plan includes comprehensive car parking standards which are set in Chapter 11 Placemaking and Managing Development. Four parking zones have been established for the City with the aim of ensuring adequate residential parking/ car storage and control of destination car parking (non-residential uses) whilst also allowing greater flexibility in car parking standards on sites well served by public transport. The four zones are detailed in Table 4.6 and are illustrated in Volume 2, Mapped Objectives".*

The Plan emphasises a new approach to car parking, with a primary aim to reduce the car parking provision. The *Development Plan* urges new developments to be located in highly accessible areas with good access to public transport or is within a walking distance to nearby centres. The Plan outlines, in Table 4.6, three car parking zones. It is believed upon inspection of the mapping that the site is largely located in Zone 3, with a small section to the north-western border of the site designated as Zone 2. Please refer to Figure 4.10 below.



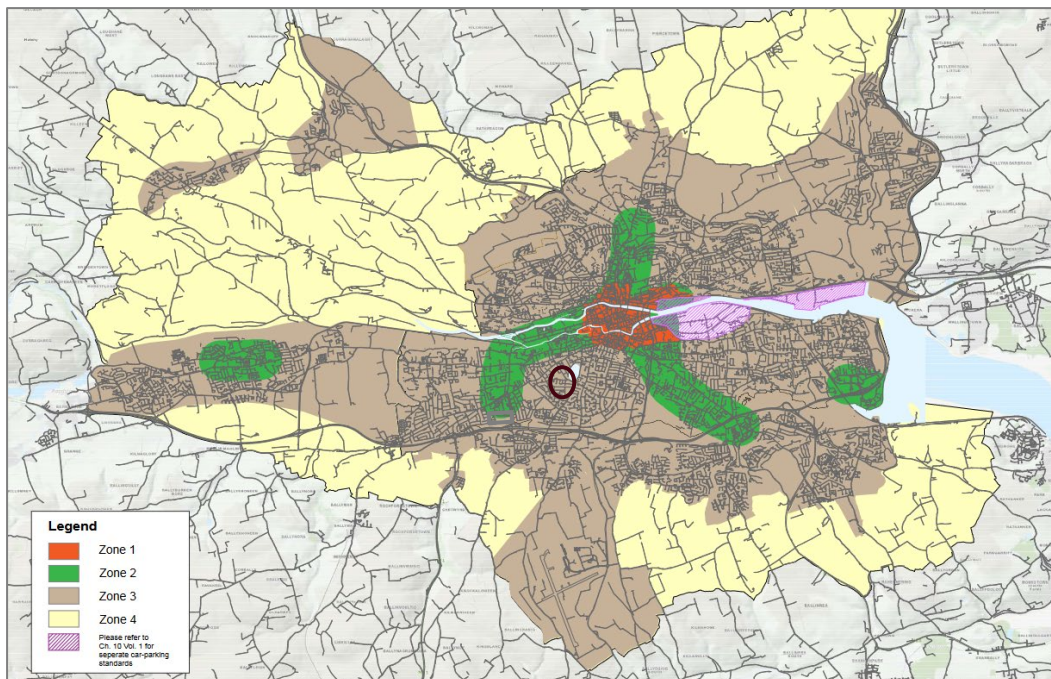


Figure 4.10: Variation of the *Development Map*, Mapped Objectives Chapter E: Parking Zones. Subject site indicated with a red circle. [Source: Adopted Variation No. 1 Parking Standards, Cork City Development Plan 2022-2028, cropped and annotated by TPA 2025]

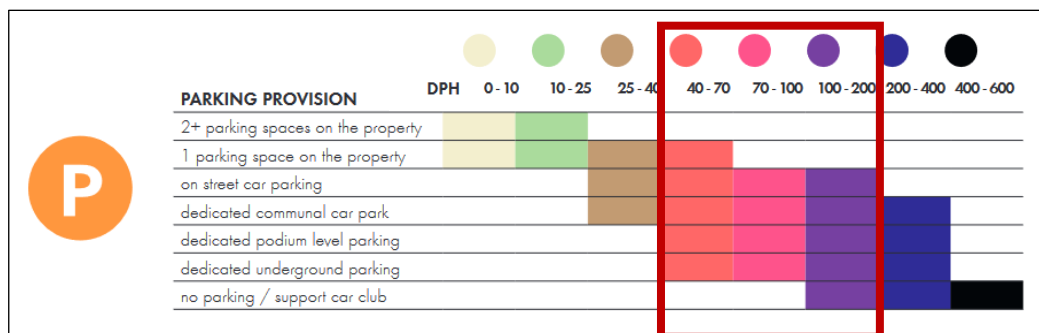


Figure 4.11: Parking Provision per Density. Relevant areas indicated by red outline. [Source *Cork City Urban Density, Building Height and Tall Building Study, Cork City and Development Plan 2022-2028*]

As per the *Development Plan*, the site's location and proposed density play a key role in calculating the parking requirements for a proposed residential development. We have included above the parking provision outlined in the Study and note the requirements for the Wilton District Centre (purple) for adjoining context. The following parking provision may apply to the subject site;

- 1 no. parking space on the property (this is a maximum standard);
- On street car parking;
- Dedicated communal car park;
- Dedicated podium level parking;
- Dedicated underground parking;
- No parking/ support car club.

We note that the subject site largely layout falls within the ‘inner suburbs’ designation, which does not include provision for 1 no. parking space on the property. Accordingly communal forms of car parking provision are assumed to be preferential at this location. Chapter 4 of the *Development Plan* outlines policy regarding parking standards for new developments;

*“4.106 As a mechanism in achieving the City Councils overarching aim of providing for a co-ordinated approach to the development of the City the following approach will be taken towards new developments:*

- Direct high-density residential land use and high trip generating uses including employment and retail to areas that are currently, or will be, served by high frequency transport services;*
- Set maximum parking standards across the City including the Urban Towns, taking into account accessibility to public transport and / or access to local services including education and employment;*
- Set out car-free or low car standards in development areas within an 800m walking catchment area of Cork city centre and / or of quality public transport; and;*
- Ensure that alternatives to private car ownership are made available including provision of car club bays and membership, public transport cards and increasingly, provision of and membership of cycle hire schemes”. [Our Emphasis]*

Chapter 11 of the *Development Plan* further outlines car parking standards for developments. The following is deemed to be relevant to the proposed residential development;

*“11.234 The City Council area is divided into four zones for the purposes of car parking control, based on each area’s accessibility to mass transit, cycling and walking. 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”. [Our Emphasis]*

Table 11.13 of the *Development Plan* outlines maximum parking standards, the following is in relation to residential developments on lands identified to be within Zone 2 and 3.<sup>9</sup> These are outlined in further detail in Table 4.2.3 below.

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<sup>9</sup> Parking Zone 2 reflects areas that are, or will be, accessible to mass transit on the form of Light Rail Transit or BusConnects and encompasses most the city suburbs. (Section 11.236 of CCDP)

Table 4.2.3 Maximum Car Parking Standards	
Maximum Standards: 1 space for each unit of gross floor area sqm unless otherwise indicated.	
Land Use Category	Zone 2: Accessible to mass transit (existing/ committed public transport)
Residential (1-2 Bedroom)	1.0
Residential (3-3+ Bedroom unit)	2.0
Crèches	1 Per 6 Children

Section 11.236, of the *Development Plan*, states all lands identified within ‘Parking Zone 2’ are said to be currently/ or will be accessible to mass transit public corridors. The proposed development includes a provision of 148 no. car spaces, considering there is proposed to be 348 no. units this is within the maximum standards. Up to 4 no. car parking spaces are allocated to the proposed childcare facility. The usage of car parking will be monitored with a view to reducing same over time to coincide with planned improvements to public transport and cycle infrastructure in the area.

For ease of reference, we also note disabled car parking requirements below.

*“Disabled Car Parking 11.244: 5% of car parking spaces provided should be set aside for disabled car parking...”*[Extracted for relevance]

For ease of reference, we also note EV parking requirements below.

***“Electric Vehicle Parking 11.245 To encourage the use of Electric Vehicles (EV) developments shall provide the following minimum standards for EV charging points and infrastructure:***

- 1. Multi-unit residential developments shall provide a minimum of one EV equipped parking space per five car parking. All other parking spaces shall be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs;*
- 2. New dwellings with on-site car parking should be developed with appropriate infrastructure (ducting) that enables future installation of a charging point for EVs;*
- 3. Other / non-residential development with more than 10 spaces shall provide at least 1 parking space equipped with a functioning EV charging point and at least 20% of spaces shall incorporate appropriate infrastructure (ducting) to allow for future fit out of a charging point;*

***11.246 Publicly accessible EV parking spaces should be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for disabled spaces should also be included in the development where these exist”.***

The proposed development includes the minimum of 30% of car parking spaces will have EV charge facilities in order to meet the Climate Action Targets for private car fleet electrification by 2030, at this stage. As this is a mainly residential development the preference is that most of these charge facilities will be slower (domestic) charges that will enable overnight charging to occur. In addition, the scheme includes the required minimum allocation of disabled parking spaces.

For ease of reference, the bicycle and motorcycle parking standards are noted below.

**Motorcycle Parking 11.247:** *Motorcycle parking should be provided to meet the requirements of any development. Parking spaces should be provided on the basis of one motorcycle parking bay per 10 car parking spaces provided for non-residential developments and apartment developments.*

*Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements. Where parking is provided within streets and spaces drop-kerbs should be provided to facilitate access to motorcycle parking bays;*

**Bicycle Parking 11.248:** *Bicycle parking facilities shall comply with the standards set out in Table 11.14 and be sheltered where possible and located close to main building entrances so that parking is both convenient and benefits from the direct surveillance of passers-by. Bicycle stands should allow both the frame and wheels to be securely attached to a steel tube against which the frame of a bike can be leant and locked. These can either take the form of steelwork required for other reasons (e.g. tree guards or balustrade rails), or special stands. Stands should be similar to the “U” Sheffield type. However, Cork City Council is prepared to consider innovative types which satisfy the above requirement. Detailed guidelines in respect of cycle parking may be prepared during the lifetime of this Plan”.*

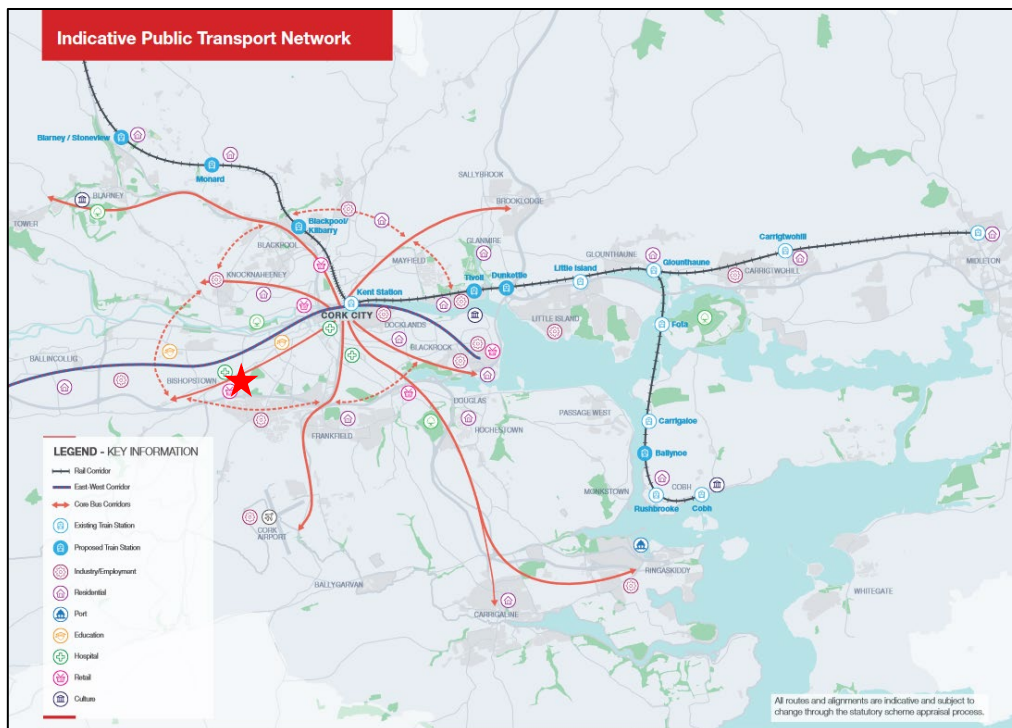
Table 11.14 of Chapter 11 of the *Development Plan* outlines the bicycle standards for residential premises this is further outlined overleaf.

Table 4.2.4 Cycle Parking Requirements	
Land Use	Cycle Parking Requirement
<b>Residential</b>	
Standard Apartments	1 per Unit in City Centre/ Inner Urban Areas
Crèches	1 Per 25 Children

The proposed development includes 503 no. bicycle parking spaces (exceeding the *Development Plans* 1 per unit).

Please refer to the Traffic and Transport Assessment (TTA) and Mobility Management Plan, prepared by ILTP. The Report outlines the potential impact of the proposed development on the surrounding road network and identify measures to mitigate these impacts and promote sustainable transport patterns. Based on the traffic conditions observed during site visits and the traffic surveys, the location of the development, and the proximity to Cork City Centre, ILTP estimated a 70/30 split in Trip Distribution for traffic exiting the development on the Sarsfield Road.

While the enclosed TTA assumes robust, worst case scenario assumptions in respect to traffic flows and traffic generation, it demonstrates that with the proposed access and egress arrangements the overall traffic impact can be accommodated in the road network. The proposed development will promote sustainable travel patterns by virtue of its location, layout, design and proximity to the public transport and cycle networks. These will be complimented with a Mobility Management Plan and the appointment of a Mobility Manager to promote sustainable travel patterns. The proposed development is located and designed such that it will not have any significant traffic impact on the existing developments in the area. The access and internal layout are designed in accordance with DMURS and includes for good permeability and will promote and facilitate sustainable travel patterns as part of the overall development. This is outlined further in the enclosed ILTP report.



**Figure 4.12: Indicative Public Transport Network.** Subject site is indicated with a red star. [Source: *Cork Metropolitan Area Transport Strategy CMATS 2040*, cropped and annotated by TPA 2025]



## **Wilton Objectives**

The *Cork City Development Plan 2022-2028* is the statutory plan for the area and will guide all future development relating to the subject lands. Wilton is identified as a City Suburb located in the southwest of Cork in the *Development Plan*. In Table 2.2, the Plan outlines an expected growth of c. 2,388 no. persons by 2028, bringing the population of the southwest suburbs from c. 40,237 to c. 42,625.

In Chapter 7 of the Development Plan classifies Wilton as a 'Level 2, District Centre' in the 'Cork Metropolitan Area Retail Hierarchy'. The Plan states the following;

### ***"District Centres and Large Urban Town Centres 7.89***

*District Centres and Large Urban Town Centres are at Level 2 in the Retail Hierarchy, performing a range of retail; and non-retail service functions including the provision of a range of convenience shopping (for definition see: Glossary of Terms), a range of comparison outlets and local services such as banks, post office, restaurants, public houses, community and cultural facilities. They serve a localised function and provide for the weekly shopping needs of their catchment areas". [Our Emphasis]*

Wilton is a well-established centre, providing a wide variety of retail and essential services, along with employment opportunities to the surrounding areas.

*"10.337 Wilton is an established neighbourhood to the west of the city centre. It is well-connected with a range of mixed-use areas including the Wilton Shopping Centre (District Centre) and the Cork University Hospital campus.*

*The Core Strategy identifies Wilton as an area for growth consolidation and enhancement by providing a mix of new neighbourhood uses in suitable and underutilised locations;*

*10.339 Wilton shopping centre forms the core of the District Centre which provides a range of convenience shopping, comparison outlets and local services such as bank, post office, library, and community facilities. The Centre provides for the weekly shopping needs of the catchment area and is located due south of Cork University Hospital. The shopping centre would benefit from redevelopment to transform it into a high quality mixed-use urban-format centre;*

*10.339 The BusConnects and future Light Rail Transit route will likely be located adjacent to this District Centre. The feasibility of this route is underway and will be supported through the delivery of Cork Metropolitan Area Transport Strategy projects. The proposed upgrades in public transport along with cycle lanes will improve access to the City Centre, Ballincollig and Mahon;*

### **Objective 10.94 Wilton;**

- a. To support the development of Wilton as an area for growth consolidation and enhancement by providing a mix of new neighbourhood uses;
- b. To support the sustainable redevelopment of the District Centre as a mixed-use, urban-format centre in line with retail and other relevant objectives". [Our Emphasis]



The *Development Plan* identifies Wilton as an area with the capacity to facilitate growth within the lifetime of the Plan. The existing centre and planned future improvements to public transport are in place to facilitate the expected growth in population. In line with the expected development of Wilton, an increase in housing will be required. Accordingly, we believe the proposed development will assist in the delivery of that expectation.

## 5.0 SUMMARY OF SUPPORTING DOCUMENTATION

A suite of supportive assessments has been submitted with the planning application. These are briefly outlined below and overleaf.

### 5.1 Architectural Design Statement

On behalf of the Applicant, Reddy's Architecture + Urbanism has prepared an *Architectural Design Statement* detailing the proposed developments design rationale. This is to be read in conjunction with the enclosed CGI pack prepared by Redline Studios.

#### 5.1.1 Phasing

The proposed development is to be constructed in 1 no. phase, consisting of the full delivery of 332 no. apartments, 16 no. townhouses and a childcare facility.

#### 5.1.2 Sustainability

The design of the development is underpinned by sustainability, the proposed layout ensures that the building footprints are reduced to ensure the existing green infrastructure is safe guarded. In Section 2.1 of the accompanying report the proposed development's energy strategy is outlined in detail. The chosen strategy is tailored fit to the proposed development and ensure efficiency. In addition, the proposed development utilises the subject site's optimal location with ample access to public transport to its benefit. In line with the *Cork City Development Plan* the proposed development has included reduced parking provision.

#### 5.1.3 Placemaking

A primary component of the proposed development's design was ensuring that the new buildings would integrate seamlessly through good placemaking. The site's layout ensures strong connectivity and permeability. This has been through landscaping and the design of the sites access, with the inclusion of potential additional cycle and pedestrian linkages. This is outlined in further detail in Section 2.1 of the accompanying report.

#### 5.1.4 Proposed Layout

The proposed layout comprises of 3 no. blocks of apartment units (ranging from 5 no. to 6 no. stories) and 2 no. rows of terraced town houses (2 no. storeys). The scale of the proposed building gradually decreases in height upon approach to the neighbouring residential premises in Cardinal Court to the west of the subject site.

With the tallest building (6 no. storeys) situated to the east of the subject site perpendicular to Sarsfield Road. With the middle two blocks providing a tiered approach to the town houses (5no. – 6no. storeys).



**Figure 5.0: Extract of Proposed Site Layout – Ground Level, prepared by Reddy A+U.**

This was done so to safeguard the residential amenity of the adjoining premises and integrate the proposed development seamlessly with the existing urban environment. As previously stated, a primary aim of the proposed development was to retain as much of the existing green infrastructure as possible.

As noted above, the primary access to the site will be via a reconfigured access point to the southeast of the site. This reconfiguration will facilitate access to the site, while maintaining security to the ESB site. In addition, cyclist and pedestrian linkages are also provided to the east via Sarsfield Road.

The layout of the blocks ensures the retention of mature trees to provide a parkland vista to the Sarsfield Road. The U-shaped middle blocks with a podium deck over parking, allows for the retention of trees while also creating ample open space for the future residents.

The scheme provides Dual-Aspect Units as 55% of the total apartments. Dual Aspect is achieved by the provision of a sufficient number of corner apartments in the block layouts, by means of off-setting the typical floor plan so that each dual-aspect apartment has a clear line of sight in two directions from the main living area. Therefore, each corner dual-aspect apartment can provide two separate windows on different walls without any immediate obstruction. This enhances the experience of light, solar gain and views for the resident.

Section 3.4 of the Report outlines the compensatory measures noted within the scheme in relation to north-facing, single-aspect units;

*“The number of north-facing, single-aspect units account for just 5% (18 units) of the total number of apartments. North facing units have been designed out of the central and middle apartment buildings completely with the 5% located solely in the eastern block;*

*The desire to retain as many of the mature trees in this portion of the site resulted in a linear shaped block to avoid Root protection zones. Whilst it was staggered in plan to reduce single aspect north facing units, three remain per floor, over 6 floor Compensatory measures include:*

- *The 18 units are designed to exceed the minimum floor area standards by 10%. This increased floor area provides a high standard of amenity for residents of these units;*
- *The open aspect without buildings to the north of this block, offering long open views for the upper units;*
- *Provision of external private amenity balconies and terraces for each unit;*
- *Extensive glazing to the facade including glass doors from both bedroom and living room to its balcony/terrace;*
- *Balconies centralised on the plan in order to provide full height, unobstructed windows in both living room and bedroom;*
- *Access to multiple sunny, public open space amenity areas immediately adjacent to their units, including large village green with mature trees;*
- *High-quality residential amenity for each unit including good storage, thermal/overheating performance, energy efficient fixtures and fittings”.*

The proposed childcare facility is located to the southeast corner of the middle block near the entrance of the site, creating a lively community. The western end of the site consists of the 2 no. rows of terraced housing, the rows are positioned to create a residential square. The layout and integration of the proposed development to wider Wilton area is outlined in greater detail in the accompanying Reddy A+U Report.

## **5.2 Childcare Demand Assessment**

A Childcare Demand Assessment has been prepared by Tom Phillips + Associates to assess the current provision of childcare facilities in the area, to accompanying the planning application. Currently, there is an average 77% operating level for the 16-no. existing childcare facilities located within 2km of the subject site, with 139 no. unoccupied childcare spaces available.

Therefore, we contend that there is not any existing undersupply of childcare facilities in the surrounding area. Therefore, we submit to the local authority that the proposed childcare facility, alongside the existing provision in the surrounding area, will be capable of supporting the childcare needs of the future residents of the proposed development. A childcare facility with 52 no. childcare spaces is to be provided. Please refer to the enclosed Report for further information.

### **5.3 Schools Demand Assessment**

A Schools Demand Assessment has been prepared by Tom Phillips + Associates to assess the current provision of school facilities in the area, to accompany the planning application. Based on the proposed housing mix and existing demographic profile for the Electoral Division where the subject site is located, we can estimate a likely demand for c. 36 no. primary school places and c. 22 post-primary school places will result from the proposed development.

As outlined in the report, the subject site is well located in terms of accessibility to existing primary, post-primary, and special educational needs schools. We contend that the supply of primary school places is currently increasing, due to the phased establishment of South Lee Educate Together National School. We contend that these additional school places to be established will be sufficient to cater for the anticipated demand for primary school spaces which will result from the proposed development.

The post-primary schools in the study area have seen a 1.6% decrease in enrolments in the last 5 academic years, which has resulted in a surplus of at least 32 no. post-primary school places within the study area. This surplus is sufficient to cater for the likely demand for post-primary school places resulting from the proposed development.

The study area features 2 no. special educational needs schools, alongside a large number of additional educational needs classrooms within the mainstream primary and post-primary schools, which will cater for those students who require additional educational supports. Please refer to the enclosed Report for further information.

### **5.4 Community Infrastructure Assessment**

A Community Infrastructure Assessment has been prepared by Tom Phillips + Associates to assess the current provision of school facilities in the area, to inform the proposed development.

The demographic profile of the local ED Study Area was largely consistent with the rest of Cork City and the State, as identified in the 2022 Census results. The population age breakdown for the subject Electoral District (ED), Bishopstown E, is generally on par with that of the Cork City and state. However, we highlight that the subject ED had a lower quantum of 0-5 years old, i.e. those who may require childcare, compared to Cork City and the state.

Similarly, the quantum of both primary and secondary school age children is significantly lower in the subject ED compared to Cork City and the State. The quantum of persons aged between 19-24 years was higher in the subject ED compared to Cork City and the State, which is likely due to the presence of 3 no. higher level education providers within the study area.

The quantum of the population aged between 25-64 years in the subject ED was relatively similar to that seen in Cork City and the state. The quantum of persons aged over 65 years in the subject ED is higher in the subject ED compared to that seen in Cork City and the State.

The subject site is ideally located with regard to the provision of community and social infrastructure, as set out in this assessment.

We note the range of public transport within the study area, which allows easy access to a range of additional varied social and community infrastructure located elsewhere within Cork, particularly in Cork City Centre. Please refer to the enclosed Report for further information.

## 5.5 Housing Quality Assessment

A *Housing Quality Assessment* was prepared by Reddy Architecture + Urbanism on behalf of the Applicant. The assessment outlines compliance of the scheme with the required standards noted in the above guidance.

## 5.6 Appropriate Assessment – Stage 1: Screening Report

On behalf of the Applicant, Malone O’ Regan Environmental has prepared an *Appropriate Assessment – Stage 1: Screening Report* to accompany this planning application. The purpose of the Assessment was to determine the proposed development’s potential impact on a European designated site within the defined ‘Zone of Influence’.

The Assessment comprised desk-based studies and 3 no. field surveys completed on the 7<sup>th</sup> of September 2023, 17<sup>th</sup> of May 2024, and the 27<sup>th</sup> of August 2024. A habitat survey, invasive species and a general assessment of other species was undertaken as a part of the assessment. The Assessment outlined that there are 2 no. European Designated Sites (Cork Harbour SPA Ref. 004030 and Great Island Channel SAC Ref. 001058) within 15km of the subject site.

The site surveyed showed there are no invasive species present on the subject lands. The Assessment states that the proposed development is not envisioned negatively impact any species or habitats. Concluding that that the Proposed Development will not result in any in-combination contribution to adverse effects on the integrity of any European Sites. Therefore, the progression to Stage 2 of the Appropriate Assessment process is not considered necessary.

For further information please refer to the accompanying documentation accordingly.

## 5.7 Site Investigation Summary Report

Malone O’ Regan has prepared a Site Investigation Summary Report to accompany the planning application.

The aim of the report is to compile and present a comprehensive analysis of the previous conducted Ground Investigation Report. The findings of the GII Report have been evaluated against established soil assessment criteria to identify potential environmental concerns. The data is also organised into tabular formats to facilitate clear interpretation and precise application. This report also addresses the classification and categorization of waste materials potentially encountered during excavation, ensuring adherence to applicable regulatory frameworks and standards.

For further information please refer to the accompanying documentation.

## 5.8 Construction and Operational Waste Management Plan

On behalf of the Applicant, Malone O' Regan Environmental has prepared a *Construction and Operational Waste Management Plan* to accompany the planning application.

The purpose of this document is to outline the proposed development's compliance with the relevant waste legislation and ensure that all site activities will not have an adverse impact on the environment. The document outlines the management measures to be taken during the construction and operational phases of the proposed development. For further information please refer to the accompanying documentation accordingly.

## 5.9 Resource Waste Management Plan

On behalf of the Applicant, Malone O' Regan Environmental has prepared a *Resource Waste Management Plan* to accompany the planning application.

The purpose of this document is to outline the manner in which construction, resources, and waste will be managed throughout the construction phase of the proposed development. The document also ensures compliance with the relevant waste legislation and policy. For further information please refer to the accompanying documentation accordingly.

## 5.10 Ecological Impact Assessment

On behalf of the Applicant, Malone O'Regan Environment has prepared an *Ecological Impact Assessment* (EclA) to accompany the planning application. The purpose of the Assessment is to survey and assess the within and surrounding the subject site. This was done to determine if there was any presence of any habitats or species that could either pose a constraint or be enhanced by the proposed scheme. The Assessment was carried out in conjunction with all relevant national and regional legislation. We note that a Stage 1: Appropriate Assessment has been submitted and should be read in conjunction with the EclA.

To establish the presence/ potential presence of faunal species the Assessment was based of a desktop study and 2 no. field surveys. The Field surveys were conducted on the 7<sup>th</sup> of September 2023 and the 26<sup>th</sup> of May 2024. The survey area was assessed for any protected or notable species, including invasive and other species that may have value for biodiversity.

The results of the EclA showed the following receptors were identified as having the potential to be impacted by the Proposed Development and were brought forward for further consideration;

- Scrub;
- Hedgerows;
- Birds;
- Hedgerows and Pygmy Shrews;
- Invasive Species; and;
- Other Species.



The EclA outlines a number of mitigation measures to ensure the proposed development does not result in a negative impact. The EclA concludes by stating the following;

- *“The Site itself is currently considered to be of low-moderate local ecological value;*
- *The bat surveys conducted onsite identified a small soprano pipistrelle roost onsite. This section of mature trees where the roost is located will be protected as part of the Proposed Development and has been taken into consideration at the design phase of the Proposed Development;*
- *The Site is not considered to be of high suitability or a site of importance for any Annex I or Annex II species or Red listed birds. Additionally, no Annex I or Annex II species or Red-listed birds were recorded utilising the Site during the wintering or breeding bird surveys;*
- *The Proposed Development will not result in any significant impacts on ecological receptors identified both onsite and in the surrounding area following the implementation of appropriate mitigation measures; and;*
- *The proposed Landscape Plan has been designed to compensate for any vegetation removed during Site clearance works”.*

The project ecologist has made recommendations to the design team in relation to biodiversity enhancement and public lighting. For further information please refer to the accompanying documentation accordingly.

#### **5.11 Bat Report**

On behalf of the Applicant, Malone O'Regan Environment has prepared a Bat Report to accompany the planning application. The Bat Report is incorporated as Appendix A of the EclA.

The accompanying Bat Survey Report forms an appendix to the Ecological Impact Assessment (EclA) and should be reviewed alongside it. The report details the methods and findings of the bat surveys performed on the site, as well as to assess the potential effects of the proposed development on bat species.

Several bat surveys were conducted on-site, and the following can be stated. A soprano and common pipistrelle night/feeding roost were found in three trees and two bat boxes on site. Other bat species recorded include nathusius' pipistrelle, leisler's bat, and brown long-eared bat. While the development will result in the removal of some trees the majority of the bat's habitats, including the boundary hedgerows and treelines, will be preserved. The Report outlines several mitigation measures that are to be implemented on-site. Ensuring the impact of the proposed development on bats will be negligible.

For further information please refer to the accompanying report.

#### **5.12 Bird Report**

On behalf of the Applicant, Malone O'Regan Environment has prepared a Bird Report to accompany the planning application. The Bird Report is incorporated as Appendix B of the EclA.

The purpose of the Report is to present the findings of wintering and breeding bird surveys concerning the proposed development. Overall, 12 no. species were identified during the wintering bird survey, and 18 no. species were recorded during the breeding bird surveys conducted onsite. The report outlines that the proposed development will involve the removal of the hedgerow/treeline, some boundary treatments, and the removal of the current amenity grassland which accounts for the majority of the land cover. However, suitable mitigation measures have been identified to prevent any impact on breeding birds using the site. Further stating, that the construction of the proposed development may lead to a short-to-medium-term loss of nesting and foraging areas, the newly established landscape planting will eventually provide replacement habitats for nesting and foraging.

For further information please refer to the accompanying documentation accordingly.

### **5.13 Air Quality Assessment Report**

As a part of this planning application, an Air Quality Assessment has been prepared by Malone O'Regan Environment.

The Report evaluated the impact on the air quality of the surrounding area, throughout the construction phase of the proposed development. The assessment has been conducted in accordance with the relevant standards and guidance. The report assesses the receiving environment, and the potential impact of the proposed development, and outlines mitigation measures if deemed necessary.

For further information please refer to the accompanying documentation accordingly.

### **5.14 Daylight and Sunlight Report**

As noted in above sections, on behalf of the Applicant, GIA Surveyors has prepared a Daylight and Sunlight Report to accompany the planning application. The purpose of this Report is to determine if the proposed development will provide adequate daylight and sunlight amenities to future residents. The assessment has been carried out in accordance with all relevant guidance/legislation.

The Report states that 97% of the overall units achieve the minimum levels of Median Daylight Illuminance (MDI) recommended within the BS EN 17037:2018 and the BRE Guidelines for residential buildings. Therefore 3% of the proposed units fail to meet the daylight requirements. The Report outlines a number of mitigation measures to offset this aspect. The Report states that 67% of all dwellings are south-facing, with 75% achieving at least 1.5 hrs of sunlight, and therefore meet the sunlight requirements. The remaining apartments falling short of the recommendations are further assessed with mitigation measures outlined to offset this.

For further information please refer to the accompanying documentation accordingly.

### 5.15 Microclimate Report

As noted in above sections, on behalf of the Applicant, GIA Surveyors has prepared a Microclimate Report to be submitted with the planning application. Wind microclimate conditions were assessed using high resolution Computational Fluid Dynamics (CFD). The proposed development will have a significant beneficial impact on existing conditions to the north of the site, eradicating a substantial amount of pre-existing wind safety risk around both the Tesco site and St Joseph's Church. The following mitigation measures have been proposed and found to be sufficient to ensure that the proposed development does not have any adverse impact on wind conditions:

- The landscaping plan shown in Figure 20 of the enclosed report
- 1.5m tall solid/glazed balustrade on balconies highlighted in Figure 21 of the enclosed report.

With the above measures included, wind conditions will be suitable for the intended use (or consistent with the baseline) for all thoroughfares, existing building entrances, proposed entrances, existing and proposed gardens, the proposed public realm at ground level, the proposed level 1 courtyard terraces and proposed balconies. Conditions around the site will not be impacted by the inclusion of consented cumulative schemes.

For further information please refer to the accompanying documentation accordingly.

### 5.16 Landscape Strategy Report

On behalf of the Applicant, Park Hood Chartered Landscape Architects have prepared *Landscape Strategy Report* to be submitted with the planning application. The purpose of this Report is to outline the proposed landscaping design and layout. The Report confirms that the proposed development meets all requirements in relation to public, private and communal open space provision.

For further information please refer to the accompanying documents accordingly.

### 5.17 Landscape and Visual Impact Assessment

On behalf of the Applicant, Park Hood Chartered Landscape Architects have prepared a *Landscape and Visual Impact Assessment* to be submitted with the planning application. The purpose of this Assessment is to outline the potential impacts of the proposed development on the townscape/landscape and visual amenity of the subject site and the surrounding area. Following the discussions of the S32B LRD meeting, the document identifies 19 no. viewpoints to utilise as a basis to assess the proposed development's impact.

The Assessment showed that the majority of the views have a neutral, negligible, and slight impact. One view is noted to have a moderate impact; however, this will affect very few residents. The results are summarised Figure 5.2 below.

Viewpoint	Range of view	Location	Sensitivity	Magnitude	Level of effect
Viewpoint 1:	Short	Sarsfield Road	Low	Slight	Neutral
Viewpoint 2:	Short	Parking area Wilton Court	Medium	Moderate	Slight adverse
Viewpoint 3:	Short	Southbury Road	Low/Medium	Moderate	Slight adverse
Viewpoint 4:	Short	Tesco car park	Low	Slight	Neutral
Viewpoint 5:	Mid	Cardinal Way	Medium	None	None
Viewpoint 6:	Short	Cardinal Court	Medium	Moderate	Moderate adverse
Viewpoint 7:	Mid	Bishopscourt Drive	Medium	None	None
Viewpoint 8:	Mid	Richmond	Low	Negligible	Neutral
Viewpoint 9:	Long	Sarsfield Road	Low	Negligible	Neutral
Viewpoint 10:	Short	Tesco overspill/staff car park	Low	Moderate	Moderate positive
Viewpoint 11:	Short	Tesco car park	Low	Moderate	Moderate positive
Viewpoint 12:	Short	Sarsfield Road	Low	Moderate	Neutral
Viewpoint 13:	Mid	Sarsfield Road	Low	Slight	Neutral
Viewpoint 14:	Mid	Sarsfield Road	Low	Negligible	Neutral
Viewpoint 15:	Mid	Wilton Shopping Centre car park	Low	Negligible	Neutral
Viewpoint 16:	Mid	Bishopstown Road	Low	None	None
Viewpoint 17:	Long	Sarsfield Road	Low	Negligible	Neutral
Viewpoint 18:	Long	Doughcloyne Industrial Estate	Low	Slight	Neutral
Viewpoint 19:	Mid	Sarsfield Road	Low	None	None

Figure 5.2: Summary of the Landscape and Visual Impact Assessment Results. Source: Landscape and Visual Impact Assessment prepared by Park Hood Chartered Landscape Architects 2024 [Cropped by TPA, 2024]

The Assessment concludes that the location, layout, and design of the proposed development are appropriate and respond well to the subject site and its surroundings. For further information please refer to the accompanying documentation accordingly. These should be read in conjunction with the enclosed Verified Views package, prepared by Redline Studios.

Please refer to the accompanying documentation for further information.

## 5.18 Arboricultural Impact Assessment and Method Statement

On behalf of the Applicant, John Morris Arboricultural Consultancy has prepared an *Arboricultural Impact Assessment and Method Statement* to be submitted with the planning application.

The purpose of this assessment is to provide an overview of the trees and any possible constraints by trees on or within an influencing distance of the subject site. The document outlines any possible impact the proposed development may have on trees and is in line with the *BS5837:2012 Trees in relation to design, demolition and construction – Recommendations*.

There is an underlying aim where feasible to incorporate the existing healthy trees on site into the new layout of the new residential development. However, to facilitate the proposed development, 108 no. trees are required to be removed from the site.

To mitigate this removal, it is proposed to plant a diverse variety of new trees and hedges. Please refer to the accompanying documentation for further information.

#### 5.19 Archaeological Impact Assessment

On behalf of the Applicant, John Cronin and Associates have prepared an Archaeological Impact Assessment to accompany the planning application. The purpose of this assessment is to review the known and potential archaeological heritage of the subject site and the land immediately adjacent. A desktop study and site inspection were undertaken as part of the assessment.

The impact of the proposed development is addressed throughout the assessment. As there are no recorded archaeological sites within the subject lands, there are no predicted impacts. However, it is considered that there is a moderate potential for the presence of previously unrecorded archaeological remains.

For further information please refer to the accompanying documentation accordingly.

#### 5.20 Infrastructure Report and Flood Risk Assessment

Barret Mahony Consulting Engineers on behalf of the Applicant have prepared an *Infrastructure Report and Flood Risk Assessment* to accompany the planning application. The Report addresses the proposed development's surface water and foul drainage, water supply, and road engineering aspects. The report also includes a Flood Risk Assessment of the subject site. Please note that a *Statement of Design Acceptance* is included within the *Infrastructure Report and Flood Risk Assessment*.

The proposed surface water drainage has had regard to the relevant technical design documents as outlined in the accompanying documentation. The Report assesses the site's current characteristics and estimates the proposed development's run off rate to design a suitable strategy. The site's total allowable discharge rate is calculated to be 13.21 l/s, the report outlines a catchment and attenuation strategy that is compliant with the Sustainable Drainage System (SuDs) as embodied in the Greater Dublin Strategic Drainage Study. **The design team have complied with the recommendations of the GDSDS and are satisfied the development will not exacerbate existing flooding issues at the Glasheen Stream.**

For further information please refer to the accompanying documentation accordingly.

##### 5.20.1 Catchment and Attenuation Strategy

The current proposal outlines a strategy where the proposed surface water outfall to the existing 600 mm sewer at Sarsfield Road, southeast of the subject site. It is to be noted the possibility of a catchment strategy utilising two separate outfalls may be possible.

This is dependent on the viability of the proposed development utilising the 600 mm diameter sewer at Cardinal Court. Please refer to Section 2.2.3 of the accompanying Report for further information.

### 5.20.2 Integrated SuDs Approach

The Report outlines a number of proposed SuDs measures to be implemented on site, these are briefly listed as follows:

- Green Roof (Extensive and Intensive);
- Permeable Paving;
- Bio Retention Pits;
- Attenuation Tanks;
- Blue Roofs.

These measures should slow down flow rates at outfall. Again, the design team have complied with the recommendations of the GSDS and are satisfied the development will not exacerbate existing flooding issues at the Glasheen Stream. Please refer to the accompanying Report for an in-depth explanation outlining the proposed SuDs approach.

### 5.20.3 Flood Risk Assessment

The Report also outlines a Flood Risk Assessment, this assessment was carried out in accordance with *The Planning System and Flood Risk Assessment Guidelines for Planning Authorities*. The assessment was conducted in manner of phases these are listed below;

- Stage 1; Flood Risk Identification;
- Stage 2; Initial Flood Risk Assessment;
- Stage 3; Detailed Flood Risk Assessment.

The assessment identified that the subject site is not at risk of flooding and is in Flood Zone C. **It is to be noted that the Glasheen River is located c. 80m to the south, however, this is not deemed to be a risk and the proposed development should not exacerbate existing flooding issues in the area.** The Report concludes that it is not deemed necessary to carry out any further analysis of fluvial or tidal flooding.

### 5.20.4 Proposed Foul Drainage

The proposed foul drainage system has been designed in accordance with the *Code of Practice for Wastewater Infrastructure*. It is proposed that the development will connect to the existing Irish Water network on Sarsfield Road. A pre-connection inquiry was submitted to Irish Water to facilitate the connection of 391 no. units on the 8<sup>th</sup> of December 2023. A copy of the confirmation of feasibility is included as Appendix IV in the accompanying *Infrastructure Report and Flood Risk Assessment*.



### 5.20.5 Proposed Water Supply

It is proposed the development will connect to the existing 200mm diameter cast iron watermain, located along the northern footpath of the existing ESB Networks facility across the road. A pre-connection enquiry was submitted to Irish water to facilitate the connection of 391 no. units on the 8<sup>th</sup> of December 2023. The Report includes a feasibility letter stating the proposed connection is not viable without infrastructure updates prior. Please refer to the accompanying documentation for further information. A copy of the confirmation of feasibility is included as Appendix IV in the accompanying *Infrastructure Report and Flood Risk Assessment*.

### 5.20.6 Transport Infrastructure

The Report outlines that access to the site is to be gained via a new priority T-junction with the existing road to the ESB Networks. The works are outlined as follows:

*“It is proposed to retain the existing signalised junction arrangement at Sarsfield Road, and upgrade a section of the existing ESB access road, to rationalise traffic movements between the proposed development and the existing ESB networks facility;*

*The works will involve relocation of an existing ESB security hut, security gates and automated barriers to accommodate the new development T-junction, along with reconfiguration of the existing car park entrance junction. Refer to Figure 6.3 showing proposed access road upgrade arrangements including proposed junction to the new internal road network of the proposed development;*

*Additionally, pedestrian and cyclist access is proposed via separate entrances onto Sarsfield Road, in order to segregate vulnerable road users from vehicular traffic, and to provide direct linkages to the existing pedestrian and cycle network on Sarsfield Road”.*

For further information please refer to the accompanying document accordingly. In addition, this is to be read in conjunction with the separate reports on these items prepared by ILTP Traffic + Transport Consultants and Reddy’s Architecture + Urbanism.

### 5.21 Outdoor Lighting Report

An *Outdoor Lighting Report* was prepared by EDC - Engineering Design Consultants Limited on behalf of the Applicant.

The Report outlines the proposed development’s lighting scheme and compliance with the relevant guidance and standards. Please refer to the accompanying documents accordingly.

## **5.22 Energy & Heating Strategy Comparison**

An Energy and Heating Strategy was prepared by EDC - Engineering Design Consultants Limited on behalf of the Applicant. This study includes a comparison of three different heating strategies, including two standalone systems and a centralised heating system.

For a fair comparison, early-stage Part L block compliance calculations were carried out on each heating strategy to determine the developments estimated primary energy, CO2 emissions, delivered energy, running costs and PV requirements. The study also determines if the heating strategy will achieve a 10% primary energy improvement and determines what is required for it to be achieved. Third party district heating and waste heat networks outside the development's curtilage have been excluded from this study, as it was found there is no current heat networks in the area and the development is not located in a SEAI district heating candidate area.

The following heating strategies have been included in this study:

- Exhaust Air to Water Heat Pump (EAHP)
- Hot Water Heat Pump + MVHR + Electric Radiators (HWHP)
- Centralised Heating: Air to Water Heat Pump + HIU (CH: AWHP+HIU)

The four heating strategies were compared on the apartment West, East and Middle blocks. Please refer to the enclosed Energy & Heating Strategy Comparison Report, prepared by EDC for further information.

## **5.23 Traffic and Transportation Assessment and Mobility Management Plan**

As noted above, a TTA and MMP Report was prepared by ILTP Consulting to be submitted with the planning application. ILTP met with Cork City Council on various dates, to discuss the planning application and items relating to traffic and transport. It is noted that Cork City Council support in principle to providing vehicular access to the proposed development site from Sarsfield Road.

ILTP coordinated traffic count surveys undertaken in April 2024 in order to collate the full set of traffic data considered necessary to support the planning application for the proposed development. It is considered that background traffic at the subject site will not grow over time. This is in line with traffic volume trends in the vicinity of the subject site and is also underpinned by the policies and objectives as set at national, regional and local level.

ILTP carried out LinSig traffic model analysis of the junctions adjoining the proposed development to project the impact of additional traffic flows from the proposed development on the capacity of the junctions. The LinSig Traffic Models show that all arms of the junction are operating within capacity with both the recorded background traffic and projected development traffic in place.

The proposed internal layout, car parking provision and Mobility Management Plan (MMP) will further promote greater use of more sustainable travel modes. In addition, car club and electric car parking points are to be provided. Generous cycle parking is provided for within the development and provision is made for some visitor car parking spaces also.

The MMP includes for the appointment of a Mobility Manager for the development, which will ultimately come under the remit of the Management Company, which will ensure active participation of all users in promoting sustainable travel patterns.

Section 10 of the accompanying Report includes an *Outline Construction Stage Traffic Impact Assessment*. The Report outlines the traffic impacts associated with the construction phase of the proposed development, management strategies, and the proposed hours of operation during the construction phase.

Please refer to the enclosed ILTP documentation for further information.

#### **5.24 Quality Audit Report**

MHL + Associates Consulting Engineers have prepared a Quality Audit Report to be submitted with the planning application.

The Quality Audit evaluates how pedestrians, cyclists, and other vulnerable road users, including those with mobility impairments, pushchair users, and wheelchair users, will move through the area surrounding the proposed development. The Report focuses on the existing and proposed infrastructure, considers likely desire lines, and how future users will navigate the space.

For further information please refer to the accompanying documentation.

#### **5.25 Combined Stage 1 and 2 Road Safety Audit**

MHL + Associates Consulting Engineers have prepared a Combined Stage 1 and 2 Road Safety Audit to be submitted with the planning application.

The audit assesses the surrounding road infrastructure along with the proposed developments potential impact. Where necessary, the Audit provides recommendations to improve the functionality of the receiving road infrastructure.

For further information please refer to the accompanying documentation.

#### **5.26 Taking In Charge**

A taking in charge proposal has been developed by the design team and is enclosed as *Taking in Charge Site Layout (Ref. WLT-06-ZZ-DR-RAU-A-1900)*, prepared by Reddy Architecture + Urbanism. This is appended to Form 19 which is enclosed with this planning application.

## 6.0 SUMMARY OF ENCLOSURES

The following documentation is now enclosed:

### *Drawings*

#### ***Architectural Drawings (prepared by Reddy Architecture + Urbanism)***

- Existing Site Layout (Ref. WLT-06- SW- ZZ- DR-RAU-A 1002);
- Site Location (Ref. WLT-06-RAU-SW-XX-DR-A-1001);
- Proposed Site Layout Ground (Ref. WLT-06-SW-ZZ-DR-RAU-A-1003);
- Proposed Site Layout Roof (Ref. WLT-06-ZZ-ZZ-DR-RAU-A-1004);
- Taking in Charge Site Layout (Ref. WLT-06-ZZ-DR-RAU-A-1900);
- Site Contextual Elevations (Ref. WLT-06-SW-ZZZ-DR-RAU-AR-2001);
- Townhouse Block B Plans (Ref. WLT-06-THB-XXX-DR-RAU-AR-1101);
- Townhouse Block B Elevations (Ref. WLT-06-THB-XXX-DR-RAU-AR-2101);
- Townhouse Block A Plans (Ref. WLT-06-THA-XXX-DR-RAU-AR-1102);
- Townhouse Block B Elevations (Ref. WLT-06-THA-XXX-DR-RAU-AR-2102);
- West Block - Gf and 1st Floor (Ref. WLT-06-WB-XXX-DR-RAU-AR-1201);
- West Block - 2nd and 3rd Floor (Ref. WLT-06-WB-XXX-DR-RAU-AR-1202);
- West Block - 4th Floor and Roof Plans (Ref. WLT-06-WB-XXX-DR-RAU-AR-1203);
- West Block - Elevations (Ref. WLT-06-WB-XXX-DR-RAU-AR-2201);
- Middle Block - Gf and 1st Floor (Ref. WLT-06-MB-XXX-DR-RAU-AR-1301);
- Middle Block - 2nd and 3rd Floor (Ref. WLT-06-MB-XXX-DR-RAU-AR-1302);
- Middle Block - 4th and 5th Floor (Ref. WLT-06-MB-XXX-DR-RAU-AR-1303);
- Middle Block - Roof Plans (Ref. WLT-06-MB-XXX-DR-RAU-AR-1304);
- Middle Block – Creche Plan (WLT-06-MB-00-DR-RAU-AR-1308);
- Middle Block Elevations (Ref. WLT-06-MB-XXX-DR-RAU-AR-2301);
- East Block - Ground to 3rd Floor (Ref. WLT-06-EB-XXX-DR-RAU-AR-1401);
- East Block - 4th Floor to Roof (Ref. WLT-06-EB-XXX-DR-RAU-AR-1402);
- East Block Elevations (Ref. WLT-06-EB-XXX-DR-RAU-AR-2401);
- Unit Typology 1 (Ref. WLT-06-XX-XXX-DR-RAU-AR-1501);
- Unit Typology 2 (Ref. WLT-06-XX-XXX-DR-RAU-AR-1502);
- Unit Typology 3 (Ref. WLT-06-EB-XXX-DR-RAU-AR-1503);

#### ***Civil and Structural Engineering Drawings (Prepared by Barrett Mahony Consulting Engineers Ltd)***

- Roads Plan Layout (Ref. 23215-BMD-ZZ-XX-DR-C-11100);
- Buried Drainage Plan Layout (Ref. 23215-BMD-ZZ-XX-DR-C-11200);
- External Drainage Schedule (Ref. 23215-BMD-ZZ-XX-DR-C-11201);
- Suds Plan Layout (Ref. 23215-BMD-ZZ-XX-DR-C-11250);
- Watermain Plan Layout (Ref. 23215-BMD-ZZ-XX-DR-C-11300);
- Swept Path Analysis Fire Tender (Sheet 1 of 3) (Ref. 23215-BMD-ZZ-XX-DR-C-11400);

- *Swept Path Analysis Fire Tender (Sheet 2 of 3) (Ref. 23215-BMD-ZZ-XX-DR-C-11401);*
- *Swept Path Analysis Fire Tender (Sheet 3 of 3) (Ref. 23215-BMD-ZZ-XX-DR-C-11402);*
- *Swept Path Analysis - High Reach Appliance (Ref. 23215-BMD-ZZ-XX-DR-C-11403);*
- *Swept Path Analysis - Twin Rear Axle Refuse Truck Sheet 1 of 2 (Ref. 23215-BMD-ZZ-XX-DR-C-11410);*
- *Swept Path Analysis - Twin Rear Axle Refuse Truck Sheet 2 of 2 (Ref. 23215-BMD-ZZ-XX-DR-C-11411);*
- *Footpath & Cycle Path Details (23215-BMD-ZZ-XX-DR-C-12110);*
- *Roads Standard Details (23215-BMD-ZZ-XX-DR-C-12112);*
- *SURFACE WATER LONGITUDINAL SECTION SHEET 1 OF 2 (Ref. 23215-BMD-ZZ-XX-DR-C-12220);*
- *SURFACE WATER LONGITUDINAL SECTION SHEET 2 OF 2 (Ref. 23215-BMD-ZZ-XX-DR-C-12221);*
- *FOUL DRAINAGE LONGITUDINAL SECTION SHEET 1 OF 2 (Ref. 23215-BMD-ZZ-XX-DR-C-12210);*
- *FOUL DRAINAGE LONGITUDINAL SECTION SHEET 2 OF 2 (Ref. 23215-BMD-ZZ-XX-DR-C-12211);*
- *PROPOSED ROAD LONGITUDINAL SECTIONS (Ref. 23215-BMD-ZZ-XX-DR-C-12120);*
- *Typical Surface Water Drainage Details (Ref. 23215-BMD-ZZ-XX-DR-C-12250)*
- *Typical SuDS Details Permeable Paving & Green Roof (Ref. 23215-BMD-ZZ-XX-DR-C-12300)*
- *Typical SuDS Details Tree Pits (Ref. 23215-BMD-ZZ-XX-DR-C-12320)*

#### **Other Drawings**

- *Public Lighting Layout (Ref. C23024-EDC-XX-XX-DR-E3000), prepared by EDC Mechanical and Electrical Consulting Engineers;*
- *Tree Constraints Plan (Ref. 23-417-02), prepared by John Morris Arboricultural Consultancy*
- *Tree Impact and Protection Plan (Ref. 23-417-03), prepared by John Morris Arboricultural Consultancy;*
- *Tree Schedule (Ref 23-417-01), prepared by John Morris Arboricultural Consultancy*
- *Site Landscape Boundary Treatments (Ref. 7848-PHL-00-ZZ-DR-L-1001), prepared by Park Hood;*
- *Landscape General Arrangement (Ref. 7848-PHL-SW-XX-DR-L-1100), prepared by Park Hood;*
- *Landscape Masterplan and Maintenance Plan (Ref. 7848-PHL-00-ZZ-DR-L-1100), prepared by Park Hood;*
- *Hardscape Layout (Ref. 7848-PHL-00-ZZ-DR-L-1200), prepared by Park Hood;*
- *Softscape Layout/Planting Plan (Ref. 7848-PHL-00-ZZ-DR-L-1300), prepared by Park Hood;*
- *Development Impact Drawing (Ref. 7848-PHL-SW-XX-DR-L-0001), prepared by Park Hood;*

- *Landscape Sections Sheet 1 of 2 (Ref. 7848-PHL-ZZ-ZZ-DR-L-1400), prepared by Park Hood;*
- *Landscape Sections Sheet 2 of 2 (Ref. 7848-PHL-ZZ-ZZ-DR-L-1401), prepared by Park Hood;*

### **Reports**

- *Cover Letter, prepared by Tom Phillips + Associates;*
- *Planning Report and Statement of Consistency, prepared by Tom Phillips + Associates (This Document);*
- *EIAR Screening Assessment, prepared by Tom Phillips + Associates;*
- *Childcare Demand Assessment, prepared by Tom Phillips + Associates;*
- *Schools Demand Assessment, prepared by Tom Phillips + Associates;*
- *Community Infrastructure Audit, prepared by Tom Phillips + Associates;*
- *Schedule of Areas/Housing Quality Assessment, prepared by Reddy Architecture + Urbanism;*
- *Document Register/Issue slip, prepared by Reddy Architecture + Urbanism;*
- *Infrastructure and Flood Risk Report, prepared by Barrett Mahony Consulting Engineers Ltd;*
- *Project Deliverable Register, prepared by Barreet Mahony Consulting Engineers Ltd.*
- *Outdoor Lighting Report, prepared by EDC - Engineering Design Consultants Limited;*
- *Energy and Heating Strategy Report, prepared by EDC - Engineering Design Consultants Limited;*
- *Arboricultural Impact Assessment, prepared by John Morris Arboricultural Consultancy;*
- *Landscape Strategy Report, prepared by Park Hood;*
- *Landscape Visual Impact Assessment, prepared by Park Hood;*
- *Landscape Management and Maintenance Plan, prepared by Park Hood;*
- *Green and Blue Infrastructure Plan, prepared by Park Hood;*
- *Noise Impact Assessment, prepared by Malone O' Regan Environmental;*
- *Air Quality Assessment Report, prepared by Malone O' Regan Environmental;*
- *Site Investigation Summary Report, prepared by Malone O' Regan Environmental;*
- *Construction and Operational Waste Management Plan, prepared by Malone O' Regan Environmental;*
- *Resource Waste Management Plan, prepared by Malone O' Regan Environmental;*
- *ECIA (Ecological Impact Assessment), prepared by Malone O' Regan Environmental;*
- *Appropriate Assessment Stage 1: Screening Report, prepared by Malone O' Regan Environmental;*
- *Archaeological Impact Assessment, prepared by John Cronin and Associates;*
- *Traffic and Transportation Assessment and Mobility Management Plan, prepared by ILTP Consulting;*
- *Wind Microclimate Assessment Report, prepared by GIA;*
- *Daylight, Sunlight and Shadow Impact Assessment, prepared by GIA;*



- *Technical Note, prepared by GIA;*
- *CGIS Booklet, prepared by Redline Studios;*
- *Verified Views Booklet, prepared by Redline Studios;*
- *Technical Note, prepared by Jensen Hughes;*
- *Technical Note - Ventilation Noise Impact Assessment, prepared by Wave Dynamics;*
- *Draft construction Management Plan, prepared by DCON Safety Consultants;*
- *Aeronautical Assessment Report, prepared by O'Dwyer & Jones;*
- *Quality Audit Report, prepared by MHL consulting;*
- *Combined Stage 1 & 2 Road Safety Audit, prepared by MHL consulting;*
- *Glint and Glare Assessment, prepared by Macroworks;*

#### **Application Form and Fee**

- **Application Form** - Application Form (Letter of Consent from Landowner Attached), prepared by Tom Phillips + Associates;
- **Form 19** - Large-Scale Residential Development Pre-Application Form (Letter of Consent from Landowner Attached as Appendix A, Taking in Charge drawing attached as Appendix B), prepared by Tom Phillips + Associates;
- **Fee** – As per Cork City Council's requirement the appropriate fee of €46,363.20 for the application has been paid and the receipt is appended to the Application Form. This is calculated on the basis of:
  - $348 \text{ units} \times €130 = 45,240$ . Creche area  $156 \text{ sqm} \times €7.20 = 992.02 = \text{€46,363.20}$

## 7.0 CONCLUSION

In summary, the proposed development will provide for, inter alia, 348 No. units on underutilised lands, in a built-up suburban area in Cork City. The development will make a strong contribution to housing delivery in the area by providing a significant quantum of residential units in a variety of housing types and sizes. The proposed childcare facility and public open space will contribute to the Wilton area from a placemaking perspective, while providing new housing, sensitively stitched into an existing community, for both future occupiers and existing residents. We contend that the proposed development is generally in accordance with the following national and local policy documents:

- *The National Planning Framework (Ireland 2040 – Our Plan) (2018)*
- *The Draft Revision of National Planning Framework (2024)*
- *Southern Regional Spatial Economic Strategy (RSES) (2019)*
- *Cork Metropolitan Area Transport Strategy (CMATS) 2040 (2020)*
- *Sustainable and Compact Settlements Guidelines for Planning Authorities (2024)*
- *The Urban Development and Building Heights Guidelines for Planning Authorities (2018)*
- *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023)*
- *Climate Action Plan 2024 – Changing Ireland for the Better (2024)*
- *The Design Manual for Urban Roads and Streets (DMURS) (2019)*
- *Part V of the Planning and Development Act 2000: Guidelines (2017)*
- *Department of the Arts, Heritage and the Gaeltacht ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011)*
- *The Urban Design Manual: A Best Practice Guide (2009)*
- *The Planning System and Flood Risk Management (2009)*
- *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*
- *Childcare Facilities Guidelines (2001)*
- *Cork City Development Plan 2022-2028 and associated appendices (2022)*

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

Yours sincerely,



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**Órla Casey**

**Associate**

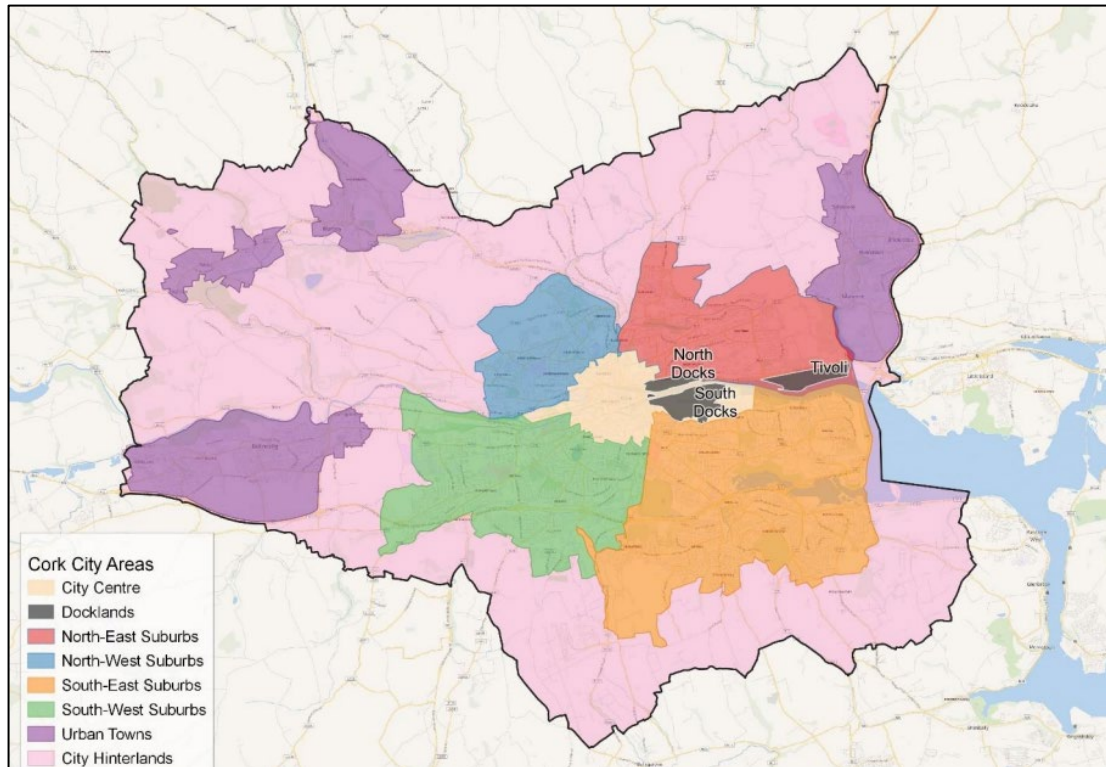
**Tom Phillips + Associates**



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## APPENDIX A - ANALYSIS OF THE CORK COUNTY AND CORK CITY COUNCIL JOINT HOUSING STRATEGY 2022-2028 (2021)

For the purpose of this assessment, we have analysed Census data relating to the Electoral Divisions (EDs) which are located within the 'South-West Suburbs' area, as identified in the *Cork County and Cork City Council Joint Housing Strategy 2022-2028*.



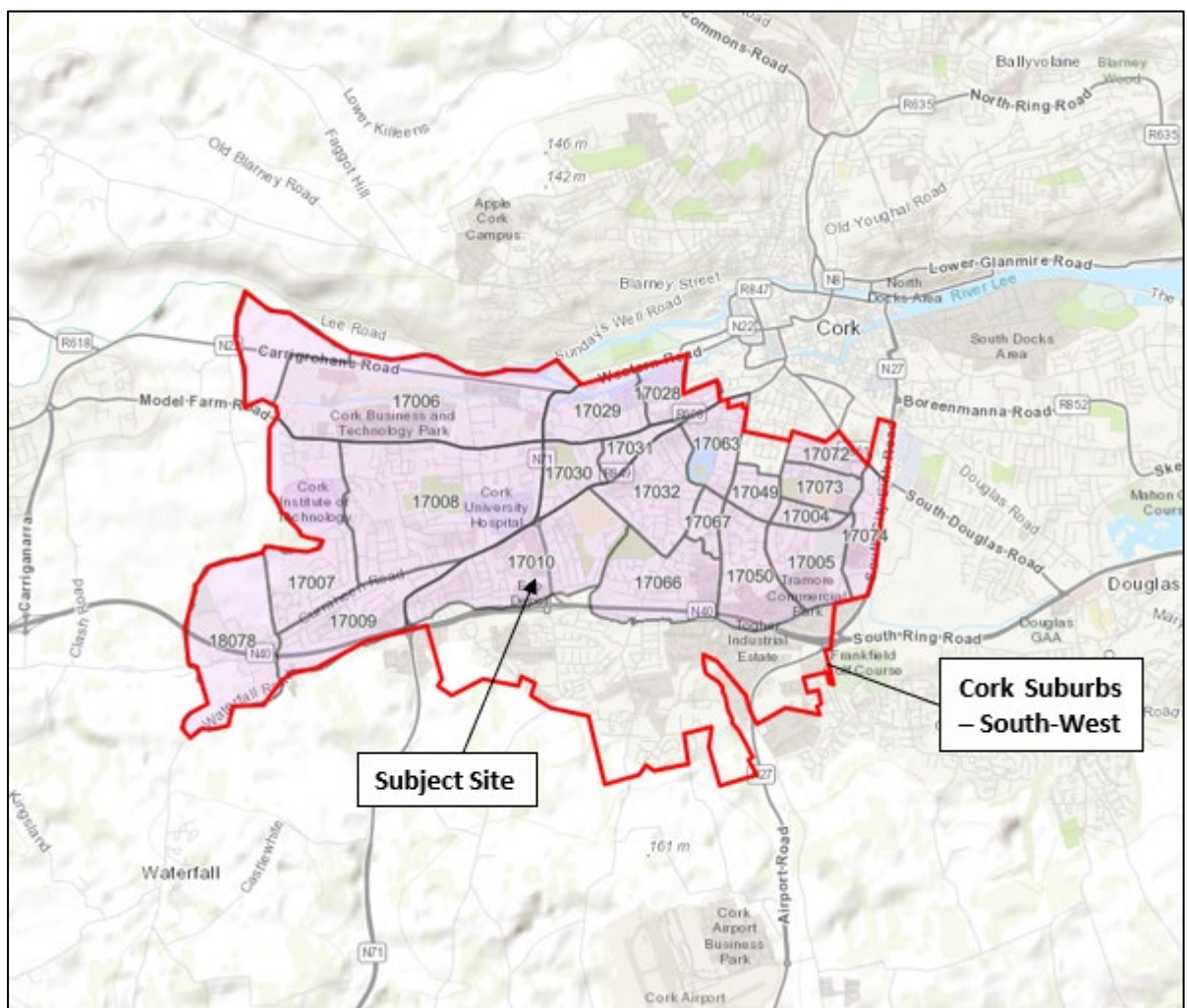
**Figure 1.0 Cork City Areas. [Source: *Cork County and Cork City Council Joint Housing Strategy 2022-2028 (2021)*]**

We have omitted Electoral Divisions which have less than 50% of their ED Boundary located within the 'South-West Suburbs' boundary, to provide a more accurate representation of the population immediately surrounding the subject site and within this area boundary. The remaining Electoral Divisions, listed below, form the 'Study Area' for the purpose of this assessment.

- Bishopstown (Part Rural)<sup>10</sup>, Co. Cork (ED ID 18078)
- Ballypheane A, Co. Cork (ED ID 17004)
- Ballypheane B, Co. Cork (ED ID 17005)
- Bishopstown A, Co. Cork (ED ID 17006)
- Bishopstown B, Co. Cork (ED ID 17007)
- Bishopstown C, Co. Cork (ED ID 17008)
- Bishopstown D, Co. Cork (ED ID 17009)
- Bishopstown E, Co. Cork (ED ID 17010)
- Gillabbey B, Co. Cork (ED ID 17028)
- Gillabbey C, Co. Cork (ED ID 17029)
- Glasheen A, Co. Cork (ED ID 17030)

<sup>10</sup> Titled 'Bishopstown' within the 2022 Census.

- Glasheen B, Co. Cork (ED ID 17031)
- Glasheen C, Co. Cork (ED ID 17032)
- Pouladuff A, Co. Cork (ED ID 17049)
- Pouladuff B, Co. Cork (ED ID 17050)
- The Lough, Co. Cork (ED ID 17063)
- Togher A, Co. Cork (ED ID 17066)
- Togher B, Co. Cork (ED ID 17067)
- Turners Cross B, Co. Cork (ED ID 17072)
- Turners Cross C, Co. Cork (ED ID 17073)
- Turners Cross D, Co. Cork (ED ID 17074)



**Figure 2.0: Location of the subject site in the context of the 'Study Area' for purpose of this assessment, which comprises the Electoral Divisions within the 'Cork Suburbs – South-West' boundary. (Source: Central Statistics Office, as mapped by Tom Phillips + Associates, 2025)**



<b>Table 1.0 Population of Electoral Divisions within the 'Cork City South-West Suburbs' as per the 2016 and 2022 Census'</b>				
<b>Name</b>	<b>2016</b>	<b>2022</b>	<b>Actual Change No.</b>	<b>% Change</b>
<b>STUDY AREA ELECTORAL DIVISIONS</b>				
Bishopstown (Part Rural)	364	421	57	15.7%
Ballyphehane A	662	666	4	0.6%
Ballyphehane B	806	846	40	5.0%
Bishopstown A	2,223	2,292	69	3.1%
Bishopstown B	1,934	2,016	82	4.2%
Bishopstown C	4,925	5,074	149	3.0%
Bishopstown D	1,492	1,513	21	1.4%
Bishopstown E	3,253	3,213	-40	-1.2%
Gillabbey B	1,103	1,173	70	6.3%
Gillabbey C	2,198	2,116	-82	-3.7%
Glasheen A	813	795	-18	-2.2%
Glasheen B	716	843	127	17.7%
Glasheen C	2,733	2,702	-31	-1.1%
Pouladuff A	723	757	34	4.7%
Pouladuff B	1,675	1,643	-32	-1.9%
The Lough	1,623	1,641	18	1.1%
Togher A	2,064	2,324	260	12.6%
Togher B	701	683	-18	-2.6%
Turners Cross B	1,196	1,239	43	3.6%
Turners Cross C	773	755	-18	-2.3%
Turners Cross D	471	495	24	5.1%
<b>Total</b>	<b>32,448</b>	<b>33,207</b>	<b>759</b>	<b>2.3%</b>
<b>CORK CITY AND SUBURBS</b>				
<b>Total</b>	<b>208,669</b>	<b>222,526</b>	<b>13,857</b>	<b>6.6%</b>
<b>CORK COUNTY</b>				
<b>Total</b>	<b>542,868</b>	<b>584,156</b>	<b>41,288</b>	<b>7.6%</b>
<b>STATE</b>				
<b>Total</b>	<b>4,761,865</b>	<b>5,149,139</b>	<b>387,274</b>	<b>8.1%</b>

<b>Table 2.0 Number of Households by Number of People per Household for Electoral Divisions within the 'Cork City South-West Suburbs' as per the 2022 Census</b>								
<b>Electoral Division</b>	<b>1 person households</b>	<b>2 person households</b>	<b>3 person households</b>	<b>4 person households</b>	<b>5 person households</b>	<b>6 person households</b>	<b>7 person households</b>	<b>8 or more persons households</b>
Bishopstown (Part Rural)	42 (31%)	36 (27%)	19 (14%)	21 (16%)	14 (10%)	2 (1%)	0 (0%)	0 (0%)
Ballyphehane A	87 (32%)	74 (27%)	46 (17%)	43 (16%)	15 (5%)	6 (2%)	3 (1%)	1 (0%)
Ballyphehane B	87 (27%)	93 (28%)	60 (18%)	55 (17%)	18 (6%)	8 (2%)	4 (1%)	2 (1%)
Bishopstown A	198 (26%)	274 (35%)	138 (18%)	96 (12%)	40 (5%)	19 (2%)	6 (1%)	1 (0%)



Bishopstown B	211 (28%)	240 (32%)	126 (17%)	109 (14%)	49 (6%)	20 (3%)	3 (0%)	2 (0%)
Bishopstown C	371 (23%)	527 (33%)	244 (15%)	270 (17%)	139 (9%)	43 (3%)	9 (1%)	5 (0%)
Bishopstown D	176 (28%)	234 (37%)	82 (13%)	83 (13%)	44 (7%)	11 (2%)	0 (0%)	1 (0%)
Bishopstown E	307 (25%)	386 (31%)	242 (20%)	169 (14%)	94 (8%)	26 (2%)	8 (1%)	4 (0%)
Gillabbey B	197 (41%)	122 (25%)	69 (14%)	44 (9%)	25 (5%)	20 (4%)	6 (1%)	2 (0%)
Gillabbey C	175 (26%)	208 (31%)	137 (20%)	65 (10%)	53 (8%)	20 (3%)	12 (2%)	5 (1%)
Glasheen A	82 (27%)	95 (31%)	53 (17%)	48 (16%)	20 (6%)	7 (2%)	4 (1%)	0 (0%)
Glasheen B	77 (25%)	68 (22%)	58 (19%)	49 (16%)	35 (11%)	14 (5%)	3 (1%)	1 (0%)
Glasheen C	339 (29%)	388 (34%)	198 (17%)	147 (13%)	52 (5%)	20 (2%)	5 (0%)	2 (0%)
Pouladuff A	101 (31%)	95 (29%)	68 (21%)	39 (12%)	14 (4%)	4 (1%)	2 (1%)	0 (0%)
Pouladuff B	195 (29%)	195 (29%)	133 (20%)	103 (15%)	33 (5%)	17 (3%)	2 (0%)	0 (0%)
The Lough	192 (28%)	204 (30%)	150 (22%)	72 (11%)	38 (6%)	16 (2%)	1 (0%)	1 (0%)
Togher A	216 (24%)	274 (31%)	163 (18%)	117 (13%)	79 (9%)	25 (3%)	6 (1%)	2 (0%)
Togher B	92 (31%)	93 (32%)	50 (17%)	42 (14%)	9 (3%)	8 (3%)	0 (0%)	0 (0%)
Turners Cross B	169 (31%)	175 (32%)	104 (19%)	72 (13%)	23 (4%)	4 (1%)	0 (0%)	1 (0%)
Turners Cross C	113 (35%)	85 (27%)	46 (14%)	45 (14%)	21 (7%)	6 (2%)	2 (1%)	1 (0%)
Turners Cross D	78 (37%)	59 (28%)	30 (14%)	27 (13%)	10 (5%)	7 (3%)	1 (0%)	1 (0%)
<b>Total</b>	<b>3,505 (27%)</b>	<b>3,925 (31%)</b>	<b>2,216 (18%)</b>	<b>1,716 (14%)</b>	<b>822 (7%)</b>	<b>303 (2%)</b>	<b>77 (1%)</b>	<b>32 (0%)</b>

**Table 3.0 Number of Retired/Older Couple Family Units for Electoral Divisions within the 'Cork City South-West Suburbs' as per the 2022 Census**

<b>Electoral Division</b>	<b>Retired/Older Couple Family Units</b>	<b>Retired/Older Couple Family Units as % of Overall Family Units</b>
Bishopstown (Part Rural)	14	17.3%
Ballyphehane A	30	17.3%
Ballyphehane B	50	22.2%
Bishopstown A	59	25.5%
Bishopstown B	135	33.3%
Bishopstown C	354	33.7%
Bishopstown D	154	38.7%
Bishopstown E	171	24.9%
Gillabbey B	20	18.7%
Gillabbey C	22	12.6%
Glasheen A	35	23.5%
Glasheen B	26	23.4%
Glasheen C	208	31.0%
Pouladuff A	57	27.5%
Pouladuff B	104	22.9%
The Lough	68	23.9%
Togher A	135	22.3%

Togher B	36	20.2%
Turners Cross B	88	27.7%
Turners Cross C	32	17.2%
Turners Cross D	35	28.0%
<b>Total</b>	<b>1,833</b>	<b>26.9%</b>

The *Cork County and Cork City Council Joint Housing Strategy 2022-2028* (2021) provides the following overview of the Cork City South-West Suburbs:

#### **Section 5.4.4.4 - South-West Suburbs**

*“The South-West Suburbs include the areas of Togher, Ballyphehane, Bishopstown, and Wilton and had a population of 40,237 in 2016 (19% of the total City population). The Cork City Development Plan 2022-2028 sets a **population target of 42,543 by 2028 for the area, an increase of 2,316 or 6%, and a housing target of approximately 926 units.** The South-West Suburbs are also targeted for significant transport investment, particularly the proposed light rail line to Ballincollig.*

*The South-West Suburbs also contain a broad social mix. Given the amount of land available, the area will be important in delivering a range of housing types and tenures to meet overall demand in the City, including social housing delivered through Part V and direct delivery. The South-West Suburbs contain both of Cork’s major third-level institutions, UCC and MTU, as well as other major public institutions such as Cork University Hospital. There will therefore likely be continued demand for private rented accommodation in particular in the area as well as for purpose-built student accommodation;*

*Delivery of this housing will be important to meet this demand, provided it is delivered in accordance with the policies of the Cork City Development Plan to ensure appropriate housing quality and tenure mix.” [Our Emphasis.]*

As outlined above, the *Cork County and Cork City Council Joint Housing Strategy 2022-2028* sets a target for 6% population growth (2,316 persons) within the Cork City South-West Suburbs for the 6-year period of this Strategy (2022-2028). The Census data provided above for the previous 6-year period (2016-2022) shows that the Cork City South-West Suburbs saw a population increase of just 2.3% (759 no. persons). This was lower than the percentage population growth seen in the wider Cork City and suburbs, Cork County, and the State during this same intercensal period. This intercensal population growth for the Study Area is significantly lower than the 6% target for the South-West Suburbs area. The subject application will assist in reaching this population growth target through the provision of new housing in close proximity to key social infrastructure including Cork University Hospital, University College Cork, and Munster Technological University. Again, it is worth reiterating that the HNDA is based on out of date demographic information, as per out of date NPF population projections. Please refer to the above section on Unit Mix for further information.



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## APPENDIX B- DEMAND ANALYSIS REPORT - SAVILLS

# Wilton ESB Residential Development, Cork

## Management Strategy Report for: The Land Development Agency (LDA)



Directors and Leadership Group: Mark Reynolds (Managing), Isobel O'Regan (Chairperson), Peter Callender (Company Secretary), Tom Barrett, Larry Brennan, Gavin Butler, James Butler, Paul Campbell, Orla Coyle, Darragh Cronin, Andrew Cunningham, Brendan Delaney, Roy Deller, Allen Devine, Shane Duffy, Niall Guerin, Ray Hanley, Samantha Kedward, Brian Kirwan, Jarlath Lynn, Catherine McAuliffe, Gerry McCarthy, Kevin McMahon, Neal Morrison, Sarah Murray, Clarie Neary, Karen Nolan, Roland O'Connell, Fergus O'Farrell, Peter O'Meara, Domhnall O'Sullivan, David Potter, John Ring, Andrew Sherry, Andrew Smyth, Kevin Sweeney, John Swarbrigg, Ben Turtle, Paul Wilson

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Savills Commercial (Ireland) Limited is a subsidiary of Savills plc.  
PSRA Registration No: 002233

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# 1. Introduction

## Executive Summary

Savills have been requested by the Land Development Agency (LDA) to provide a property management strategy report for their proposed residential development at Wilton ESB Residential Development, Sarsfield Road, Wilton, Cork.



*Figure 1 – Site Location*

The aim of this report is to set out the management strategy for the proposed scheme, from development phase through to full occupation and operation. It focuses on the management of all internal and external common areas and facilities, the building fabric, multiple tenancies, community engagement and promotion of sustainable modes of transport.

## Development Description

The LDA intend to apply for planning for a residential development with a total application site area of 2.61Ha, on lands at Farrandahadore More, Sarsfield Road, Wilton, Cork. The subject site lies between Wilton District Centre to the north and the ESB's regional headquarters to the south. The greenfield site formerly owned by the ESB offers a unique opportunity to provide a residential development with linkages to the established City Centre.



As part of the planning application the necessary due diligence reports on topographical, archaeological, arboricultural, environmental and planning matters will be taken into consideration when preparing the site for future development.



Figure 2 – Proposed Site Layout & Boundary

The development has a total gross floor area of approximately 30,494.3 sq. m. and will consist of 348 residential units across three apartment blocks and two rows of townhouses, ranging in height from 2 to 6 stories. The unit mix is as follows:

- 152 x 1 Bed 2P units (44%);
- 48 x 2 Bed 3P units (14%);
- 120 x 2 Bed 4P units (34%);
- 12 x 3 Bed 5PS units (3%);
- 16 x 3 Bed townhouses (5%).

Additionally, the development will consist of a crèche with a floor area of 138 sq. m, 58 surface level parking spaces, 90 under-podium parking spaces, and 503 bicycle spaces for residents and visitors. Public open space totalling 3545 sq. m is provisioned for throughout the common areas, with the largest allocation fronting Sarsfield Road.

It will comprise hard and soft landscaping including but not limited to internal roads, cycle and pedestrian route pathways, boundary treatments, trees, gardens, street furniture, lighting, car parking (including car sharing and accessible spaces), bicycle parking, services infrastructure, refuse storage facilities, and SuDS measures.

## Unit Mix

Location	Dwelling Type	1 Bed 2P	2 Bed 3P	2 Bed 4P	3 Bed 5PS	3 Bed	Total Units
Terraced	Townhouse					12	<b>12</b>
End-Block	Townhouse					4	<b>4</b>
West Block	Apartment	56	20	50	0	-	<b>126</b>
Middle Block	Apartment	59	22	53	0	-	<b>134</b>
East Block	Apartment	37	6	17	12	-	<b>72</b>
	<b>Total</b>	<b>152</b>	<b>48</b>	<b>120</b>	<b>12</b>	<b>16</b>	<b>348</b>
	Mix	44%	14%	34%	3%	5%	100%

Figure 3 – Schedule of Residential Accommodation

The tenure mix for the proposed apartments (East, Middle and West Blocks) is 10% Social Homes (36 units) and 90% (296 units) Cost Rental Homes. The 16 townhouse units will be Affordable For Sale Homes. The 36 units allocated under Social Homes tenancies will be managed by Cork City Council, whilst the remaining 296 units falling under Cost Rental tenure will either be managed in-house by the LDA's asset management team or outsourced to a local property managing agent. The scheme also comprises a 138 sq. m crèche facility which will be leased to an appropriate third-party operator.

## 2. Summary of Relevant Experience

Savills has extensive experience in the residential market managing developments similar to the proposed development at Wilton.

Sites of similar scale include:

- The Elysian, Cork City
- Rostrevor Place, Rathgar, Dublin 6
- U Hansfield, Dublin 15
- Fernbank, Dublin 14
- Opus, Hanover Quay, Dublin 2

As experienced property managing agents, Savills understands what is required in providing the highest standards of management service. Our objective is to provide a safe, clean and attractive living and working environment. In delivering property management services, it is our policy to:

- Regularly tender contracts to ensure value for money in service provision and in doing so leverage off the bulk purchasing power of Savills;
- Seek to review service standards to optimise service delivery and value;
- Have regard to industry best policy codes of practice set out by the Society of Chartered Surveyors Ireland;
- Utilise contractors that have been approved by Savills compliance procedures.

Effective residential property management requires a two-pronged approach. On the tenant management side, the residential management and lettings manager will deal with all aspects of the tenancies including, but not limited to, contract queries, monitoring of rental payments, issuing of lease renewals, rent reviews, maintenance and general day-to-day queries.

On the block management side, the residential block manager oversees all services associated with the internal and external common areas, the building fabric, procurement and

management of third party hard and soft services contractors to undertake planned and reactive maintenance, house rule compliance, insurance related matters and so forth.

Savills have a dedicated Operations Management Platform that allows collaboration between residents and onsite management to optimise delivery of services.



*Figure 4 – The Elysian, Cork City*



*Figure 5 - Rostrevor Place, Rathgar*



*Figure 6 – Opus, Hanover Quay*

### 3. Appointment of Property Managing Agent & Associated Responsibilities

It is optimal to appoint a property management agent prior to the completion of the development to ensure that all the necessary procedures and policies are in place for completion, mitigating delays when the first residents take occupation.

The managing agent will oversee the provision of all site services and therefore have the responsibility of preparing the annual service charge budgets and sinking fund contributions. Sinking funds are required to cover communal project costs of a non-recurring nature as the development ages, including but not limited to the building fabric, M&E assets, and common areas.

### 4. Amenity Considerations & Management

The proposed development has been designed to provide high quality affordable homes and establish a new community through provision of amenities across the scheme for both residents and the public.

#### Internal Amenity Space

The onsite crèche facilities (highlighted blue in Figure 7 below) are to be centrally located on the ground floor of the Middle Block. The facilities will include classrooms, a sleeping room, staff accommodation, allocated parking and a play area. This service will be made available to both residents and the public.

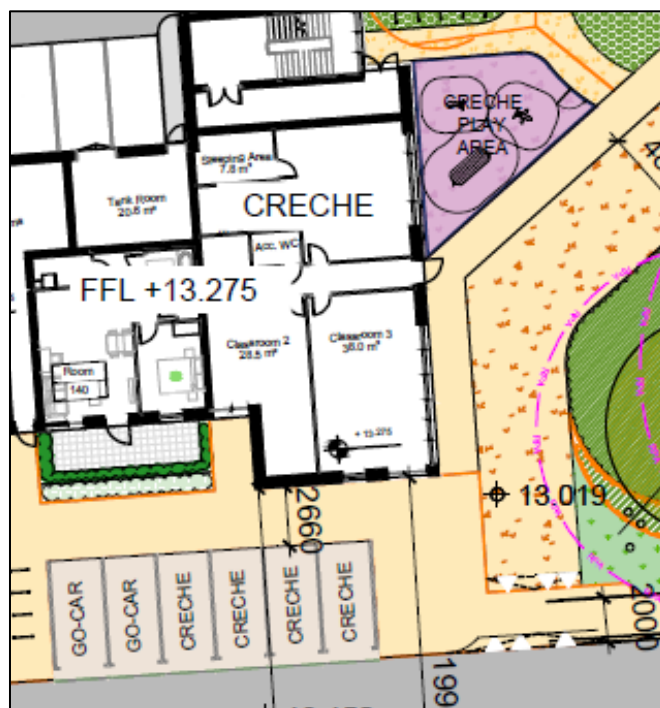


Figure 7 – Creche Facilities (highlighted blue) within Middle Block

## External Amenity Space

External communal amenity space has been incorporated within the design to promote social, leisure, and biodiversity activities. This space will be managed by the appointed managing agents and as such will be responsible for maintaining it to a high standard and in accordance with habitat and biodiversity goals set out in the application.

## Management of Communal Amenities

The costs associated with the provision of all communal amenities within the development will be captured under a service charge budget. This budget will include Estate and Block schedules to ensure costs are recovered on a 'pay per use' principle. An apportionment schedule will also be included in the service charge budget pack, which will detail how costs for the services provided are apportioned across all residential units. Typically, costs are apportioned based on the size of each unit. In rental scenarios, these service charge costs can be included within the rents paid under each tenancy.



## A. Management

Where a managing agent has been appointed on behalf of the LDA (or a Management Company), they will be responsible to manage the building fabric and common areas within all three apartment blocks, the external common areas not taken in charge by the local authority, and all tenancy agreements falling under Cost Rental homes. The townhouses purchased under the Affordable Homes scheme will be the responsibility of each unit owner to maintain.

As outlined previously, the tenant management piece focuses on the tenant and any matters inside the unit door. Examples include contract queries, monitoring of rental payments, issuing of lease renewals, rent reviews, maintenance and general day-to-day queries.

The residential block manager oversees all matters outside the unit door. These include all services associated with internal and external common areas, the building fabric, procurement and management of third party hard and soft services contractors to undertake planned and reactive maintenance, house rule compliance, and insurance related matters.

As a team, the lettings manager and block manager coordinate residential events and initiatives, develop and implement strategies (e.g. parking & mobility management, ESG), engage with the local community and other stakeholders.

## B. Heating

A centralised heating scheme is proposed to meet the space heating and domestic hot water requirements for the development. The network will be heated by air to water heat pumps in centralised locations. Hot water is distributed through a heat network, providing space heating and domestic hot water for the complete development. A heat interface unit is located within each home, within this unit a plate heat exchanger transfers the heat from the heat network to the homes' internal space and domestic hot water system. A management company or a third-party Energy Service Company (ESCO) will bill individually for heat consumed.

This system has many advantages for the development:

- It can provide Part L compliance and meet renewable targets from a centralised location.

- Most system maintenance can be carried out without access to the individual apartments (some maintenance will be required for HIUs).
- Reduces space requirement for plant within the units when compared to individual heating systems.
- Space heating can also be met in common areas by the communal heating system removing the requirement for additional systems and reducing maintenance.
- Future proofs the development as it allows for other renewable gases such as green hydrogen to be used in the future, with minimal changes to the heat network.

### C. Security and Access Control

The development has been designed to create a safe neighbourhood, using passive surveillance externally through the positioning of the creche and amenity spaces throughout the site. Appropriate levels of public lighting are positioned along the key access routes and CCTV will be positioned at all access points as a minimum.

Security presence will be a key component of the management strategy, particularly in the early stages of the complete development. The aim of this is to make both residents and surrounding locals feel secure with the addition of a large-scale development.

It is foreseen that the initial security offering could comprise of full-time security at certain hours overnight followed by a phased down approach to include security patrol cars in key circulation areas.

Access to each apartment block will be controlled appropriately using fob access at all entrance lobbies. This will be complimented by intercom systems with built in cameras allowing individual apartments manage guest access. Access control will also be installed for resident bin and bike stores.

CCTV will also be installed at all access points to each apartment block and backed up by DVR recorders for retrospective checks and downloads in accordance with GDPR policies.

## 5. Parking & Mobility Management

### Site Location & Design

The proposed development will encourage sustainable travel patterns due to its location, layout, design and proximity to the public transport and cycle networks. These will be complimented with a Mobility Management Plan (MMP) and the appointment of a Mobility Manager to promote sustainable travel patterns.

The proposed development is located and designed such that it will not have any significant traffic impact on the existing developments in the area. The access and internal layout are designed in accordance with DMURS (Design Manual for Urban Roads & Streets) and includes good permeability to promote and facilitate sustainable travel patterns as part of the overall development.

### Mobility Management Plan

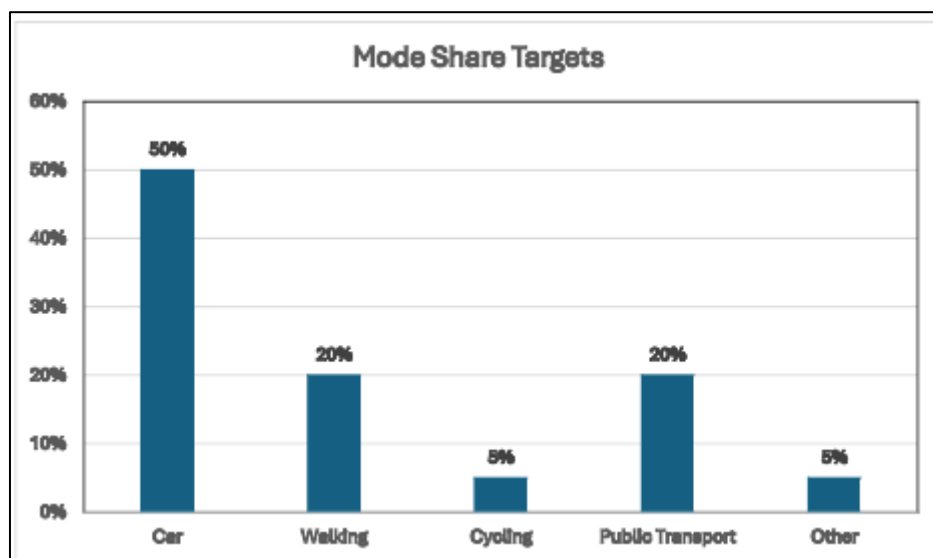
A MMP is provided as part of the Traffic and Transport Assessment to be submitted with the planning application. Its purpose is to establish a formal mobility and traffic management plan dealing with transport modal shift and accessibility.

A number of proposals will be included in the plan covering cycling, parking, traffic management and bus services. The main goals are outlined as follows:

- (i) To maximise the permeability and efficiency of the design to facilitate connectivity with existing infrastructure.
- (ii) To improve accessibility to public transport and active modes of transport.
- (iii) To reduce reliance on private cars and therefore reduce transport emissions.
- (iv) To work closely with the Local Authority, the National Transport Authority, Transport Infrastructure Ireland, Bus Éireann and all other relevant stakeholders in a partnership model to promote an increased uptake in public transport.

Active mobility is a primary aim of The LDA for this development. Residents' accessibility to public transport services in the area along with the extensive cycle networks will facilitate a reduced reliance on private cars.

A Welcome Pack will be provided to all new residents, and a section will be dedicated to raising awareness of the travel choices available to them and their guests. The management company will act as Mobility Manager for the development to deliver and develop the MMP.



*Figure 8 – Anticipated Mode Share Targets*

Figure 8 above is taken from the MMP accompanying this planning application. The targets are consistent with wider transport objectives to promote and maximise greater use of sustainable travel modes in developments which are appropriately located and well served by sustainable travel modes.

The plan confirms there is adequate spare capacity in the existing public transport service that serve this proposed development. The targets are deemed realistic given the close proximity of the development to high capacity and high frequency public transport services, combined with the reduced car parking and increased cycle parking provision.

As per the MMP, the travel demands by private car will be mitigated further over time through implementation of the following recommended MMP measures to achieve the proposed modal split targets.

- Appointment of a travel plan coordinator / mobility manager
- Appropriate car parking and cycle parking provision
- Promote public transport
- Promote walking & cycling initiatives
- Car sharing
- Car club & electric car facilities

## Bicycle Spaces

As per Figure 2, the site layout map confirms the provision of multiple bicycle parking bays throughout the development for ease of access and promote use. A total of 503 bicycle spaces will be provisioned for. Additional cycle facilities such as e-bikes and cargo bikes will also be provided as part of the overall development.

## Car Parking Provision

There is a total of 58 surface level parking spaces and 90 under-podium parking spaces allocated to residents and visitors. The proposed provision of 148 car spaces consists of a 1:1 ratio of spaces to townhouse units, a 1:0.4 ratio of spaces to apartment units. Of these 4 spaces will be allocated to the creche and 2 spaces allocated to a car share scheme.

Car parking usage will be monitored over time with the aim to reducing it to coincide with planned improvements to public and cycle transport infrastructure in the locality. Car spaces on the surface car park will be available to the residents on a first come basis and will be taken in charge by the local authority it is proposed. The under-croft car spaces will be allocated on a need's basis. Other car parking management measures including a permit system, car parking specific house rules, and clamping may likely have to be considered over time as occupancy levels grow.

## EV Charging

Given EV's are set to become the dominant means of vehicle fuelling over the coming years and 85% of EV charging takes place at home, EV charging facilities have been accommodated for. It is proposed a minimum of 30% of car parking spaces within the development will have EV charging facilities in order to meet the Climate Action Targets for private car fleet electrification by 2030. Given it is a residential development, the chargers will be slower domestic chargers that will enable overnight charging to occur.



## 6. Conclusion & Contact Details

Given consideration to the plans and particulars of the proposed development, and our experience in managing similar developments, Savills have set out their opinions within this strategy report how the proposed development can be managed to the highest of standards for the benefit of all stakeholders, but above all the residents.

### Contact Details:

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