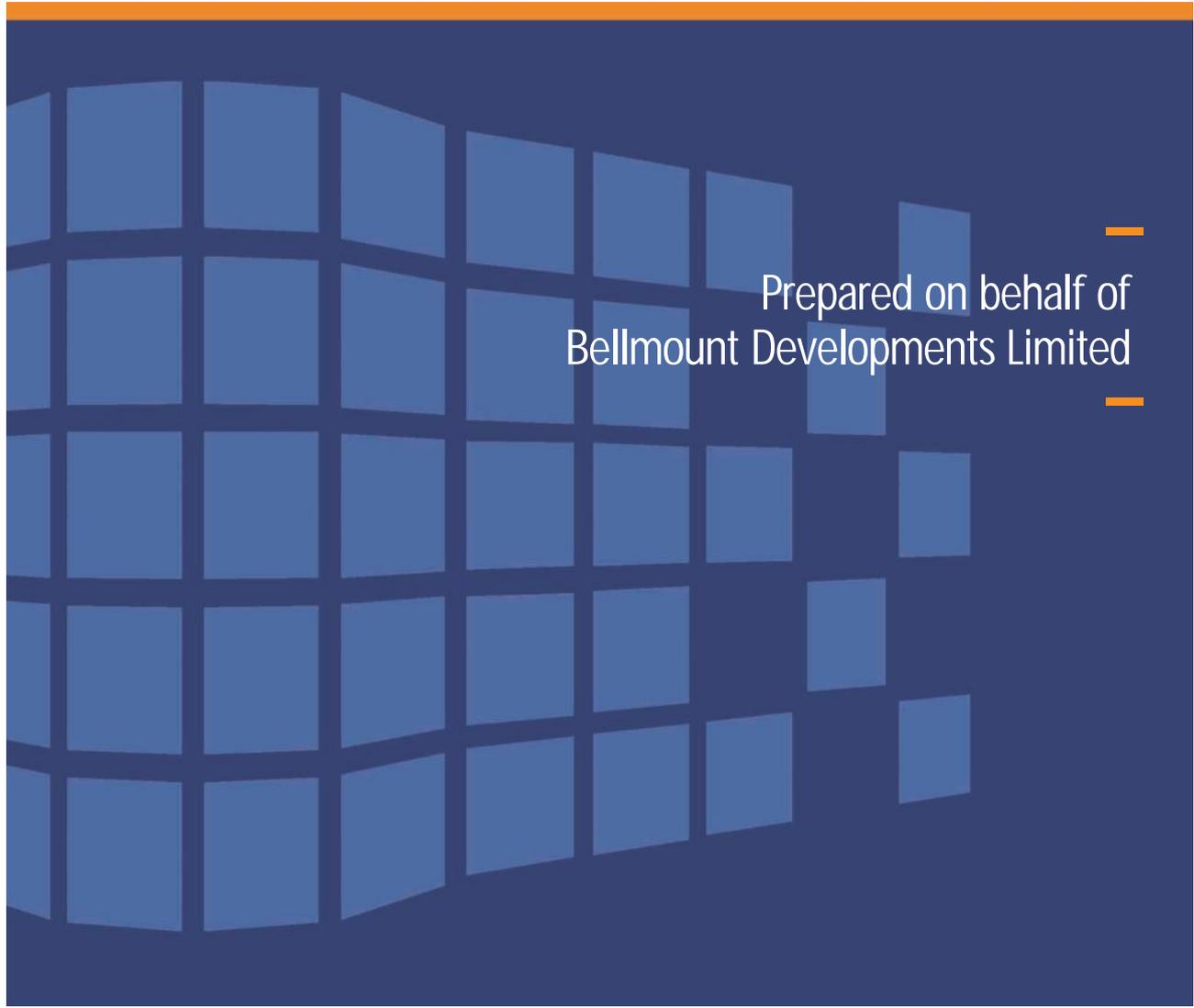


Response to An Bord Pleanála Pre-Application Consultation Opinion

Strategic Housing Development Application for permission for a Residential Development at Millfield Service Station, Redforge Road, Blackpool, Cork.

September 2021



Prepared on behalf of
Bellmount Developments Limited

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1.0 Introduction

This report addresses the specific information requirements and issues raised by An Bord Pleanála (ABP) in their Notice of Pre-Application Consultation Opinion (Case Ref. ABP-308537-20) issued on 3rd March 2021 in relation to the proposed Strategic Housing Development (SHD) at Millfield Service Station, Redforge Road, Blackpool, Cork.

The Opinion issued by the Board was subsequent to a tri-partite meeting which took place on 22nd February 2021. Following the tri-partite meeting the Board issued an Opinion in accordance with Section 6(7) of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that a number of items needed to be addressed in accordance with the requirements of articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, including the following:

1. Compliance with Development Plan and Local Area Plan Objectives
2. Justification for proposed Building Heights
3. Treatment of Redforge Road
4. Contaminated Land.

A response to the above items is provided in **Section 2.1** of this report. In addition to the items sought under Articles 297 and 298, the following additional information was also requested to be submitted with any application for permission under Article 285(5)(b) of the Regulations:

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

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

5. An inward noise impact assessment having regard to the proximity of the proposed development to the adjoining mainline railway which should include specific design mitigation measures to ensure that a satisfactory standard of amenity for future residents is achieved.
6. A housing quality assessment which provides the specific information required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should demonstrate how the proposed apartments comply with the planning policy requirements set out in those guidelines, including in particular SPPR 7 and SPPR8 in relation to Build-To-Rent development.

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

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

A response to the above items is provided in **Section 2.2** of this report.

The Opinion issued by the Board also requested that the following authorities be notified in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- Irish Water
- National Transport Authority
- Iarnród Éireann
- Córas Iompair Éireann
- Commission for Railway Regulation
- Transport Infrastructure Ireland
- Irish Aviation Authority
- The Operator of Cork International Airport
- Cork Childcare Committee

2.0 Statement of Response to Specific Information Requirements

We will respond to the items requested under articles 297 and 298 in Section 2.1 (items 1 to 4) and the additional information requested under Article 285(5)(b) of the Regulations in Section 2.2 (items 1 to 10) below.

2.1 Response to issues raised under Articles 297 and 298

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

In accordance with section 5(5)(b)(i) of the Act of 2016 (as amended), the statement of consistency should have regard to the provisions of the current North Blackpool Local Area Plan 2011 (as extended), as well as the Cork City Development Plan 2015. Furthermore, in accordance with section 5(6) of the Act of 2016 (as amended), where the proposed strategic housing development would materially contravene the City Development Plan or North Blackpool Local Area Plan, as the case may be, other than in relation to the zoning of the land, then the statement provided for the purposes of subsection (5)(b)(i) shall indicate why, in the prospective applicant's opinion, permission should nonetheless be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

The Statement of Consistency by McCutcheon Halley Planning Consultants has regard to the provisions of the North Blackpool Local Area Plan 2011 (as extended), as well as the Cork City Development Plan 2015.

A Material Contravention Statement by McCutcheon Halley Planning Consultants is enclosed with this application. As outlined in the Material Contravention Statement, it is submitted that the proposed development is broadly compliant with the provisions of the Cork City Development Plan 2015-2021, apart from the building height and apartment design parameters and would therefore be in accordance with the proposed planning and sustainable development of the area.

It is submitted that while a grant of permission for the proposed Strategic Housing Development would not materially contravene a land use zoning objective of the Development Plan, it would materially contravene objectives of the plan with regard to building height and apartment design. It is submitted that having regard to the provisions of section 37(2)(b)(i), (iii) and (iv) of the Planning and Development Act 2000, as amended a grant of permission in material contravention of the development plan would be justified for the following reasons and considerations:

- (a) the proposed development is considered to be of strategic or national importance having regard to the definition of 'strategic housing development' pursuant to section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended; and its potential to contribute to the achievement of the Government's policy to increase delivery of housing from its current under supply as set out in Rebuilding Ireland Action Plan for Housing and Homelessness 2016, and to facilitate the achievement of greater density and height in residential development in an urban centre close to public transport and centres of employment.
- (b) It is submitted that in respect of building height, permission for the proposed development should be granted having regard to Government policies as set out in Project Ireland 2040 National Planning Framework in particular Objectives 13 and 35 and the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018.

- (c) It is submitted that in respect of apartment design and size, the proposed development should be granted permission having regard to Government Policy set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

2. Justification for proposed building height

Further consideration and / or justification of the documents as they relate to the development strategy for the site, particularly with regard to building heights. Having regard to the scale and context of the proposed development, it should be clearly demonstrated that the proposed development satisfies the criteria set out in section 3.2 of the Urban Development and Building Height Guidelines for Planning Authorities (December 2018), particularly at the scale of the city and the district.

The following design amendments have been incorporated in response to the issues raised by An Bord Pleanála (ABP) in their Notice of Pre-application Consultation Opinion following tri-partite meeting on the 22nd February 2021:

The building has been reduced in height from 19 to 9 storeys and the number of apartments has been reduced from 161 to 114 in response to City Council concerns regarding a tall building in the context of Blackpool - accepting that the context may change should the Kilbarry Station be delivered as anticipated.

Overall building heights and massing has been modulated in response to issues raised to mitigate wider impacts, including maximizing access to daylight, ventilation and overlooking while minimizing overshadowing and loss of light on adjoining developments. Building set back distances from the site boundaries have been increased to provide for an appropriate interface with, and enhance, the public realm.

Height is concentrated in the southern portion of the site (9 storeys reduced from 19) at the junction of Redforge Road and the north-east access road to the retail park - to add / maintain a vertical emphasis while limiting the overall impact. Height is also reduced along the site's southern boundary (4 storeys) as the building extends west towards the Retail Park articulating and differentiating between the blocks while limiting overall impact; the height of the northern block is maintained at 6 storeys reducing to 4, graduating the height of the building as it extends north will minimize the impact on the existing residential area. The majority of apartments are dual aspect ensuring good access to daylight, ventilation and views. There are no north facing, single aspect apartments.

As previously noted, Blackpool has the potential to accommodate significant change as a result of the decline of former industrial heritage and a general level of development investment in the area over a significant period. Under CMATS a new rail station is to be constructed adjacent to the proposed development which will make the area more of an interconnected 'hub' and in-turn support higher levels of density, encourage investment and increase the area's viability and vitality as a place to live, relax, work and shop. These factors combined, strongly support increased building height in the area to facilitate and assist in renewed modern placemaking and improving the overall quality of the urban environment.

In accordance with Specific Planning Policy Requirement 3 of the UDBH Guidelines, the development has been designed to ensure there are no undue impacts on residential amenity of neighbouring residents. The height of the development has been carefully assessed and the proposed height of 4 - 9 storeys (reduced from 19 originally proposed) is considered appropriate in the context of this urban

location. The scheme consists of a variety of heights ranging from 4 storeys to 6 storeys to 9 storeys. The predominant shoulder of the main block fronting Redforge Road has been set at 6 storeys in line with the height of adjacent multi-storey carpark, stepping down to 4 storeys adjacent to Millfield Cottages to better integrate the scheme into the streetscape and reduce the impact on existing neighbours. The proposed 9-storey tall building element will serve as new visual feature for the area which will help to positively redefine Redforge Road. It will assist with wayfinding and as create a new sense of place in and around the proposed development.

In respect of the criteria set out in section 3.2 of the Urban Development and Building Height Guidelines for Planning Authorities (December 2018), specifically,

- J The site is well served by public transport with high capacity, frequent service and good links to the city with access to other modes of public transport. Blackpool and Blackpool Shopping Centre is presently served by the following buses: 203, 207a, 213 and 215.
- J The Cork Metropolitan Area Transport Strategy (CMATS) 2040 lists Blackpool/Kilbarry as a site for a new station to link up with Blarney and Monard via Kent station. The proposed development sits adjacent to the planned Blackpool/Kilbarry railway station.
- J The development successfully integrates into and will enhance the character and public realm of the area having regard to topography as evidenced in the Landscape and Visual Assessment provided with the application.
- J The proposal to replace the existing underutilised filling station with a modern purpose-built residential accommodation building will make a positive contribution to place-making, incorporating a sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.
- J The site elevation is low so the proposed taller building element will not be overly dominant on the wider cityscape, as the LVIA demonstrates;
- J Building height and massing has been modulated in response to issues raised in order to mitigate impacts;
- J The height range of 4-9 storeys is in keeping with the existing building heights in the area and the current trend of intensifying appropriate sites;
- J Heron Gate sets a local precedent for increased height which the proposed development respects and responds to. The proposal does not undermine its significance as a gateway building but serves to reinforce and positively contribute to the evolution that is well underway in this part of the city.
- J Contextual elevation studies demonstrate that the proposed development integrates in a cohesive manner with the existing context.
- J The proposals also serve to enhance the character and public realm as follows:
 - o Establish the urban edge by building to the road frontages which encompass the site to re-establish the primacy of the street;
 - o Provide active GF uses inc. commercial with residential over;
 - o Extend and enhance the public realm outside the building and along Redforge Rd to Blackpool Village;
 - o Improve local movement network – provide enhanced bicycle infrastructure, provide routes through the site linking surrounding residential area to the retail park and wider area, and provide direct connection to the future rail station;
 - o Provide semi-public space within the development for residents to use and locals to experience;
 - o Provide a building which may act as a catalyst for positive change – both physically and in terms of how the area is perceived.

-) Materials finishes have been selected with natural tactile qualities and tones, which will weather gracefully and provide visual interest.

3. Treatment of Redforge Road

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

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

Redforge Road will be subject to significant public realm improvement works as part of the overall development.

The carriageway width will be reduced to 6M with new footpaths catering for increased pedestrian use. The proposal makes provision for considered street crossings, traffic calming measures and robust materials including high quality paving materials street tree planting and raised planters with robust timber seating elements.

These necessary urban interventions and the increased usage will animate the neglected Redforge Road turning an existing backstreet into a lively component of an expanding city neighbourhood.

The public realm will be defined by the use of exemplary materials to complement and reflect the proposed architectural finishes and existing urban landscape context.

The majority of the site will be paved using reconstituted concrete pavers with granite aggregate – a material that is sympathetic with much of the streetscape improvement works currently being undertaken by Cork City Council.

Feature zones will be created adjacent to the building, interspersed with street furniture and raised planters.

Textured concrete and granite aggregate kerbs are proposed to separate the road from the footpath but as the majority of the road frontage (Redforge Road) has been designed to mitigate vehicular speed this will be treated with paved entry ramps and level surfaces (with the footpath) a bus pull in / bus stop and a drop of area these will also be paved to aesthetically widen the public realm.

Street trees will be planted to the front of the footpath close to the carriageway to allow for a wide walkable area, planted at regular intervals the trees will create a rhythm along the frontage and soften the proposed built facade while allowing space between trees for street furniture. Contemporary furniture has been chosen to provide robust seating options with timber benches allowing the addition of seating and stainless steel cycle racks allowing secure bike parking.

The landscaping and public realm works proposed as part of the proposed development included within the application site boundary along Redforge Road is subject to consent from Cork City Council, to facilitate such works (letter of consent included as part of planning application submission).

4. Contaminated Land

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

A Site Investigation Report by Malone O'Regan Environmental is enclosed with this application. As outlined in the Preliminary Site Investigation Report, it is reasonable to conclude the following:

- J The site was generally in good condition and there was no visual evidence of surface contamination identified on the site.
- J The site is located in an urban setting, which includes commercial and residential properties.
- J The receiving environment is of a moderate to high environmental sensitivity due to the proximity of the RIVER Bride and that the site overlies locally important aquifer.
- J Exceedances of the commercial GAC for chromium was identified in soils across the site and exceedances in lead within the shallow fill materials at PB3.
- J Some elevated concentrations of hydrocarbons contamination including TPH's BTEX and VOC's were identified at the Site, which did not exceed the GAC with the exception of TPH's at PB4 and 1,2-Dichloroethane and 1,2,4-Trimethylbenzene at PB7, which exceeded the GAC.
- J Given the limitations in the scope of the investigation undertaken due to current access restrictions, and taking a precautionary measure, the following remedial measures have been proposed for the site:
 - o All of the infrastructure associated with the existing service station will be decommissioned and removed from the Site. The required method statements will need to be prepared in advance of these works to ensure that they will be undertaken in accordance with required legislative requirements.
 - o Earthworks at the site will involve the removal of existing concrete slabs, excavation of soils for new drainage pipes, piling foundations and for an attenuation tank.
 - o An environmental consultant will supervise these works to ensure that all contaminated soils will be appropriately segregated and removed from the site in strict accordance with all requirements of the waste management regulations.
 - o Following earthworks site levels will be reinstated by approx.. 0.4m with imported clean fill materials.
 - o The onsite drainage network will be replaced.
 - o A radon barrier will be placed beneath the proposed buildings.
 - o The entire surface of the site will be hardstanding, as it will be either beneath buildings or hardscaping with the exception of a small landscaped area in the northern portion of the site.
- J Subject to the implementation of these remedial measures the potential for the identified contamination to impact on future human health and environmental receptors will be removed and as such, the site will be suitable for the proposed development.

2.2 Additional Information requested under Article 285(5)(b)

The additional information requested under Article 285(5)(b) of the Regulations is provided under items 1 to 10 below.

- 1. A detailed assessment of Daylight, Sunlight and Overshadowing Impacts which should have regard to the provisions of the Urban Development and Building Heights Guidelines for planning Authorities and the Sustainable Urban Housing, Design Standards for New Apartments Guidelines for Planning Authorities. The methodology adopted in such assessment shall be clearly described and any assumptions made therein should be fully justified. The assessment should extend to a wider range of units within the proposed development having regard to the orientation and aspect of the apartments. Notwithstanding the flexibility provided for in referenced guidance documents, where proposed residential units fail to achieve the minimum identified daylight reference values, an appropriate rationale and justification in respect of such residential units should be provided.***

A Daylight, Sunlight and Overshadowing Report has been prepared by Passive Dynamics Sustainability Consultants and a Wind.

The Daylight, Sunlight and Overshadowing Report prepared by Passive Dynamics Sustainability Consultants provides a comprehensive assessment of the quality of daylight/sunlight within the proposed scheme and the potential impacts from the proposed development.

Sunlight Annual Probable Sunlight Hours – Amenity Space

The proposed development has not caused any significant loss of sun light as demonstrated using simulation modelling.

Daylight Assessment - Impact of loss of daylight to neighbouring properties

A simulation was run to quantify any reduction in the vertical sky component (VSC) of the surrounding buildings resulting from the proposed development massing. While the VSC has been reduced in certain areas of the surrounding buildings according to the BRE 209 Guidance Document, the majority of windows assessed meet the criteria outlined in the BRE Guidance Document for Vertical Sky Component.

Consideration should be given to the fact that the comparison being made is between an existing, under-utilised site and the proposed development, which will inevitably have some form of an impact. Flexibility regarding BRE standards should be applied to balance the objective of achieving urban regeneration with any potential impacts.

Annual Probable Sunlight Hours – Proposed Development

In general, the majority of windows assessed meet the annual probable sunlight hours criteria outlined in the BRE Guide.

Annual Probable Sunlight Hours – Surrounding Buildings: Annual Assessment

The occupied surrounding buildings (Blocks 1 and 2) achieve 25% of their annual probable sunlight hours meaning these spaces will appear reasonably sunlit in line with BRE 209 guidance.

Winter Assessment

The occupied surrounding buildings (Blocks 1 and 2) achieve 5% of their probable sunlight hours during winter months between 21st of September and 21st of March (highlighted in red) meaning these spaces will appear reasonably sunlit in line with BRE 209 guidance.

With regard to some of the windows that do not achieve the criteria (Block 3), these houses are unoccupied and derelict and so the lack of sunlight is not critical in these spaces. In some cases within the unoccupied blocks, the annual probable sunlight hours are affected by other existing surrounding buildings in close proximity rather than the proposed development.

2. ***An analysis of wind microclimate in respect of,***
 - a. ***Ground level public spaces with reference to pedestrian occupation and usability in the context of the scale of the buildings proposed.***
 - b. ***Residential balconies and roof top communal spaces having regard to the required comfort levels and function of those spaces.***

A Wind and Microclimate Modelling Report has been prepared by B-Fluid Ltd. | Buildings Fluid Dynamics Consultants.

In relation to the Wind and Microclimate Modelling, a comprehensive qualitative and quantitative assessment of the wind and microclimate for the SHD development concluded that the development is designed to be a high quality environment for the scope of use intended of each areas/building 9i.e. comfortable and pleasant for potential pedestrian). The development does not introduce any critical impact on the surrounding buildings, or nearby adjacent roads. The main conclusions of the report are as follows:

- The proposed SHD Redforge Road Development has been designed in order to produce a high quality environment that is attractive and comfortable for pedestrians of all categories. To achieve this objective, throughout the design process, the impact of wind has been considered and analysed, in the areas where potential critical patterns were found, the appropriate mitigation measures were introduced.
- As a result of the final proposed and mitigated design. Wind flow speeds at ground floor are shown to be within tenable conditions. High wind flow speeds from the South-West introduces minor funnelling effects around the South-West corner of the development. However, as shown in the Lawson discomfort map, areas of the development can be utilised for its intended use.
- Tree planting has been utilised at ground floor, with particular attention to the South-West side of the development. This has positively mitigated any potential critical wind effects. Thus, as seen from the results, it can be concluded that good shielding is achieved at ground floor.
- Wind speeds profiles at the roof garden terrace shows that no critical wind speeds are achieved as the roof garden is well shielded from South-west winds by the adjacent buildings. The use of trees at the roof garden terrace further created a calming effect at the roof garden.
- As seen from the Lawson discomfort map of the surrounding environment, the proposed SHD Redforge Road development does not affect or give rise to negative o critical wind speed profiles at the nearby adjacent roads, or nearby buildings.
- In terms of distress, no critical conditions were found for 'Frail persons or cyclists' and for members of the general public in the surrounding of the development.

3. ***A report specifically addressing the relationship between the proposed development and adjacent, existing and permitted, residential properties to the north and northwest, with particular regard to overlooking, overshadowing and potential for overbearing impacts***

thereon. The report should have regard to the permitted layout of development on adjoining lands.

The issue of potential overlooking of adjoining unoccupied and derelict cottages has been addressed through design. Opaque gable windows are installed where views are not a requirement. Balconies of the units which directly oppose the adjoining cottages are orientated south in order to face away from the adjoining site. Perforated screens are also utilized to avoid direct overlooking where necessary.

A Daylight, Sunlight and Overshadowing assessment was undertaken by Passive Dynamics to determine the impact of loss of daylight to neighbouring properties

Daylight Assessment - Impact of loss of daylight to neighbouring properties

A simulation was run to quantify any reduction in the vertical sky component (VSC) of the surrounding buildings resulting from the proposed development massing. While the VSC has been reduced in certain areas of the surrounding buildings according to the BRE 209 Guidance Document, the majority of windows assessed meet the criteria outlined in the BRE Guidance Document for Vertical Sky Component.

Consideration should be given to the fact that the comparison being made is between an existing, under-utilised site and the proposed development, which will inevitably have some form of an impact. Flexibility regarding BRE standards should be applied to balance the objective of achieving urban regeneration with any potential impacts.

Annual Probable Sunlight Hours – Proposed Development

In general, the majority of windows assessed meet the annual probable sunlight hours criteria outlined in the BRE Guide.

Annual Probable Sunlight Hours – Surrounding Buildings: Annual Assessment

The occupied surrounding buildings (Blocks 1 and 2) achieve 25% of their annual probable sunlight hours meaning these spaces will appear reasonably sunlit in line with BRE 209 guidance.

Winter Assessment

The occupied surrounding buildings (Blocks 1 and 2) achieve 5% of their probable sunlight hours during winter months between 21st of September and 21st of March (highlighted in red) meaning these spaces will appear reasonably sunlit in line with BRE 209 guidance.

With regard to some of the windows that do not achieve the criteria (Block 3), these houses are unoccupied and derelict and so the lack of sunlight is not critical in these spaces. In some cases within the unoccupied blocks, the annual probable sunlight hours are affected by other existing surrounding buildings in close proximity rather than the proposed development.

- 4. A sustainable transport strategy for the development, which shall include a Transport Impact Assessment and site specific Mobility Management Plan, identifying specific measures to be implemented to achieve identified targets in respect of modal split.***

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

A Sustainable Transport Strategy which includes a traffic impact assessment review and a Mobility Management Plan by MHL Consulting Engineers have been submitted with the application which identifies specific measures which are to be implemented to achieve the identified targets set out in respect of modal split.

The Sustainable Transport Strategy provides details on how the development will not give rise to over-spill parking in the surrounding area.

- 5. An inward noise impact assessment having regard to the proximity of the proposed development to the adjoining mainline railway which should include specific design mitigation measures to ensure that a satisfactory standard of amenity for future residents is achieved.***

A Noise Impact Assessment and Acoustic Design Statement by Malone O'Regan Environmental has been submitted with the application which has regard to the proximity of the proposed development to the adjoining mainline railway and includes specific design mitigation measures to ensure that a satisfactory standard of amenity for future residents is achieved.

- 6. A housing quality assessment which provides the specific information required by the 2018 Guidelines on Design Standards for New Apartments. The assessment should demonstrate how the proposed apartments comply with the planning policy requirements set out in those guidelines, including in particular SPPR 7 and SPPR 8 in relation to Build-To-Rent development.***

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

A detailed schedule of accommodation and Housing Quality Assessment has been provided by Butler Cammoranesi Architects demonstrating compliance with the relevant standards outlined in the 2018 Guidelines on Design Standards for New Apartments. The assessment demonstrates how the proposed apartments complies with the planning policy requirements set out in those guidelines, including in particular SPPR 7 and SPPR8 in relation to Build-To-Rent development

A building lifecycle report has been provided by Butler Cammoranesi Architects which includes details of all external materials and finishes and durability of same.

- 7. The assessment of landscape and visual impacts should identify and assess potential impacts on views and vistas specified for protection in the Cork City Development Plan and referenced in the Local Area plan. In addition, the assessment should have regard to potential impacts on views on the approach to the city from the north.***

Photomontages by Pederson Focus and Landscape and a Visual Impact Assessment (LVIA) by Cathal O'Meara Landscape Architect have been prepared and are submitted as part of the SHD Application to assist the Boards assessment of the visual impact of the scheme.

As requested in the Boards Opinion, the LVIA, Photomontages and Planning and Design Statement by Butler Cammoranesi/McCutcheon Halley, pay particular attention to the impact on protected views and prospects identified in the current City Development Plan and the localised impact on approach to the city from the north, and demonstrate how the proposed development will have a positive visual impact.

8. A Quality Audit Report in accordance with Appendix 4 of the Design Manual for Urban Roads and Streets, to include a Road Safety Audit, and a DMURS Street Design Audit.

A Quality Audit Report in accordance with Appendix 4 of the Design Manual for Urban Roads and Streets, including a Road Safety Audit, and a DMURS Street Design Audit is provided by MHL Consulting Engineers and forms part of this application.

9. A construction environmental management plan and a construction traffic management plan.

A Construction Environmental Management Plan and a Construction Traffic Management Plan are provided by Malone O'Regan Environmental and forms part of this application.

10. Measures to address the surface water drainage requirements of the planning authority as identified in their report 25/11/2020.

Measures to address the surface water drainage requirements of the planning authority as identified in their report 25/11/2020 is provided by JODA Consulting Engineers in Appendix E of the Civil Engineering Report submitted with this application

3.0 Notification of Statutory Bodies

Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing) Development Regulations 2017 and the Board's Notice of Pre-Application Consultation Opinion, the prospective applicant has notified the following authorities of the making of the SHD application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

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