

Planning Department,
Cork City Council,
City Hall,
Anglesea Street,
Cork,
T12 T997.

Thursday, 29th September, 2021
[By Online Consultation Portal]

Dear Sir/Madam,

Re: SUBMISSION TO THE DRAFT CORK CITY DEVELOPMENT PLAN 2022-2028 IN RELATION TO LANDS AT WATER STREET, LOWER GLANMIRE ROAD, CORK CITY.

1.0 INTRODUCTION

JMCM Properties Limited and James McMahon Limited¹ have retained Tom Phillips + Associates (Town Planning Consultants), to make this submission to the *Draft Cork City Development Plan 2022-2028*, in relation to a c. 1.6 ha masterplan site in their ownership at Water Street, Lower Glanmire Road, Cork City. The *Draft Plan* is currently on public display until 4th October 2021.

In the interest of clarity, the eastern portion of the site (c. 0.9 ha) is in the ownership of JMCM Properties Ltd. The western portion of the site (c. 0.7 ha), which encompasses the operational McMahon Builders Providers warehouse is in the ownership of James McMahon Ltd. Both of these companies operate under the parent company Derevova Holdings Ltd., however due to the current operations existing on the McMahon Builders Providers site, it is proposed that the eastern portion of the site is brought forward for delivery in the first instance, to be assessed under a wider masterplan.

This masterplan will ensure the delivery of the wider land holding on a phased basis, until such a time that the current McMahon Builders Providers operations can be relocated. This masterplan is to be agreed with Cork City Council at a later date, through the planning application process.

¹ Ashbourne Hall, Ashbourne Business Park, Dock Road, Limerick, V94 NPE0.

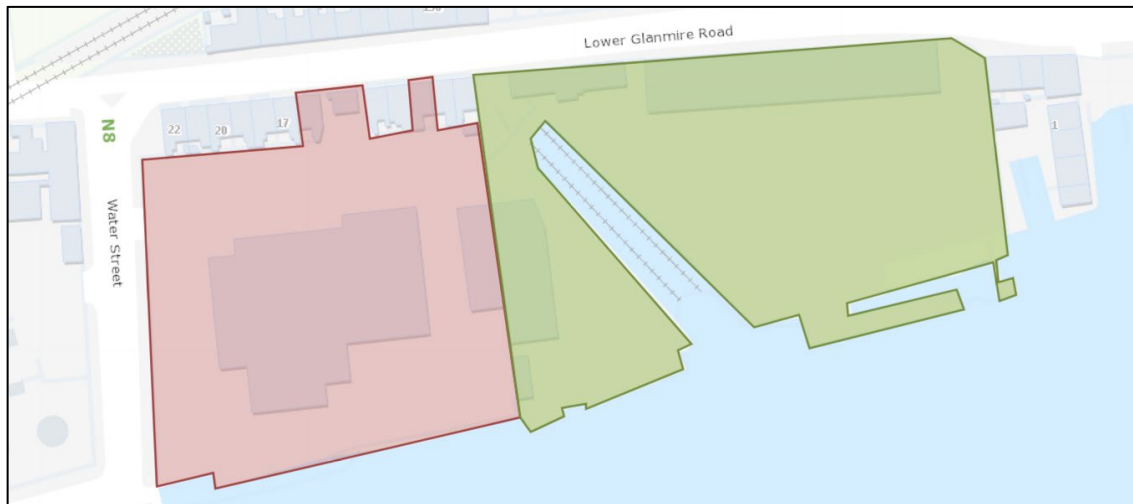


Figure 1.0 – Indicative boundaries of the subject site, with the existing McMahon Builders Providers Site and Nos. 13 and 16 Glanmire Road included for the purposes of this assessment in Red. The JMCM Properties Ltd. Site, which is to be prioritised and supported in this instance is indicated in Green. [Source: Myplan.ie, cropped and annotated by Tom Phillips + Associated, 2021]

The purpose of this submission to the *Draft Development Plan* is as follows –

1. *To highlight the strategic importance of the sites as landmark or gateway sites;*
2. *To ensure that development management policies outlined in the Draft Plan allow for the sustainable development of the sites, namely height and density policies;*
3. *To ensure that supportive infrastructure is provided to enable the development of the sites;*
4. *To request that some of the designations outlined in the Draft Plan pertaining to the sites and their context are clarified.*

We note that the *Draft Development Plan* outlines the strategic importance of the redevelopment of the docklands of Cork City, as the largest regeneration project in Ireland to date. The vision for the docklands is to develop a sustainable neighbourhood in the centre of Cork City, for people to live and work.

The City Docks (both North and South) has the capacity to accommodate a residential population of between 22,500 and 25,000 people and a further 20,000 – 25,000 jobs, making the area “a strategically significant new sustainable residential neighbourhood, an extension to the City Centre with a strong economic role and a sustainable green lung for Cork.”

We note that the wider site is zoned under the *Draft Cork City Development Plan 2022 – 2028* as ZO 2 – *New Residential Neighbourhoods*, which notes it is an objective of the Local Authority;

“to provide for new residential development in tandem with the provision of the necessary social and physical infrastructure.”

We note permissible uses under ZO 2 are as follows;

“Housing, employment, neighbourhood services, community hub, education, health services, cultural activities, sports and recreation, amenity and open space.”

The centre of the wider site, surrounding the existing slip way has been zoned as ZO 16 – *Public Open Space*, which notes it is an objective of the Local Authority;

“to protect, retain and provide for passive and active recreational uses, open space, green networks, natural areas and amenity facilities.”

In addition, we note permissible uses under ZO 16 are as follows;

“Lands in this zone comprise a wide range of passive and active recreational and amenity resources for the community including parks, sport and water sports, leisure facilities, amenity areas and natural areas including ecological networks, woodlands and other habitats. The primary purpose of this zone is to preserve all land in this zone for open space and amenity use.”

Both of these zoning designations are generally welcomed by JMCM Properties Limited and James McMahon Limited, who are fully committed to delivering a contemporary mixed-use development on the wider site, with associated facilities, utilising a design that is appropriate to its urban context.

It is considered that given the sites’ locational characteristics, development with increased height and density above what is currently allowed under the *Draft Plan*, will inherently accord with National and Regional sustainable planning policies and principles, particularly in relation to the promotion of more compact and efficient forms of urban development in appropriate locations. Detailed consideration of these national and regional policies is outlined below, in addition to consideration of the development potential of the sites and the surrounding context.

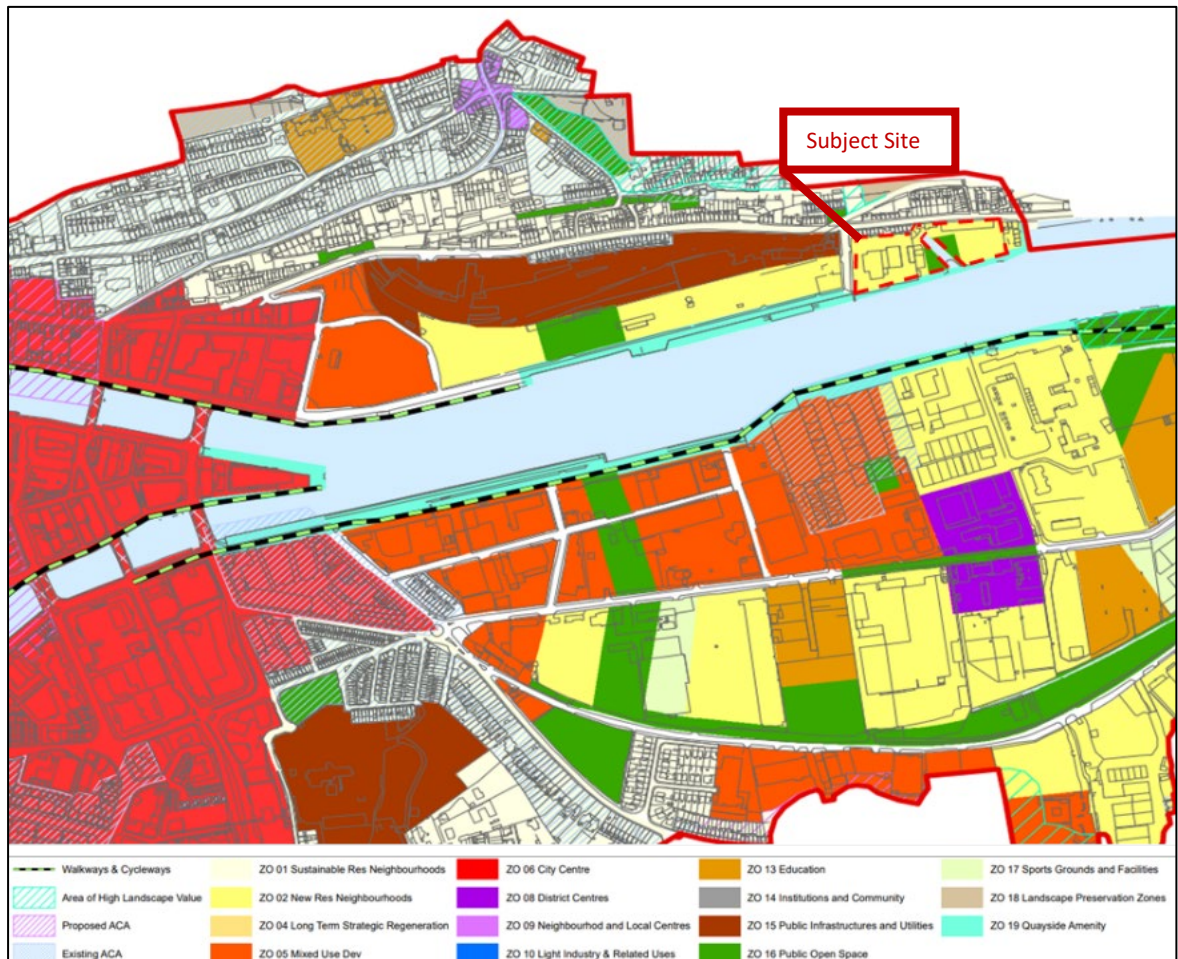


Figure 1.0 - Zoning Map of the Subject Site (indicative boundary outlined in red dashed line) [Source: *Draft Cork City Development Plan Volume 2 Map 1*. Cropped by TPA, 2021].

2.0 SITE LOCATION AND CONTEXT

The wider subject site is situated on the corner of Lower Glanmire Road (N8) and Water Street (N8) and constitutes the current McMahon Builders Providers site and Nos. 13 and 16 Lower Glanmire Road (which are in the ownership of JMCM Properties Ltd.), as well as warehousing facilities to the east, as outlined in figure 1.0. The wider site is relatively flat and fronts onto the River Lee. The wider site is bounded by The River Lee to the south, Water Street to the west and the Lower Glanmire Road to the north. There are also 12 no. dwellings on the northern roadside boundary. The eastern site, which contains a number of commercial buildings and hardstanding, also includes a pre-existing slip way, providing access to the river.

As noted above, it is envisaged that the wider site would be brought forward for delivery through the formulation of a masterplan document, with the eastern portion of the development to be prioritised (as per Figure 1.0). The McMahon Builders Providers operations will remain in situ until such a time arises that an alternative premises can be delivered and consequently it is proposed that the eastern portion of the site is brought forward for delivery in the first instance.

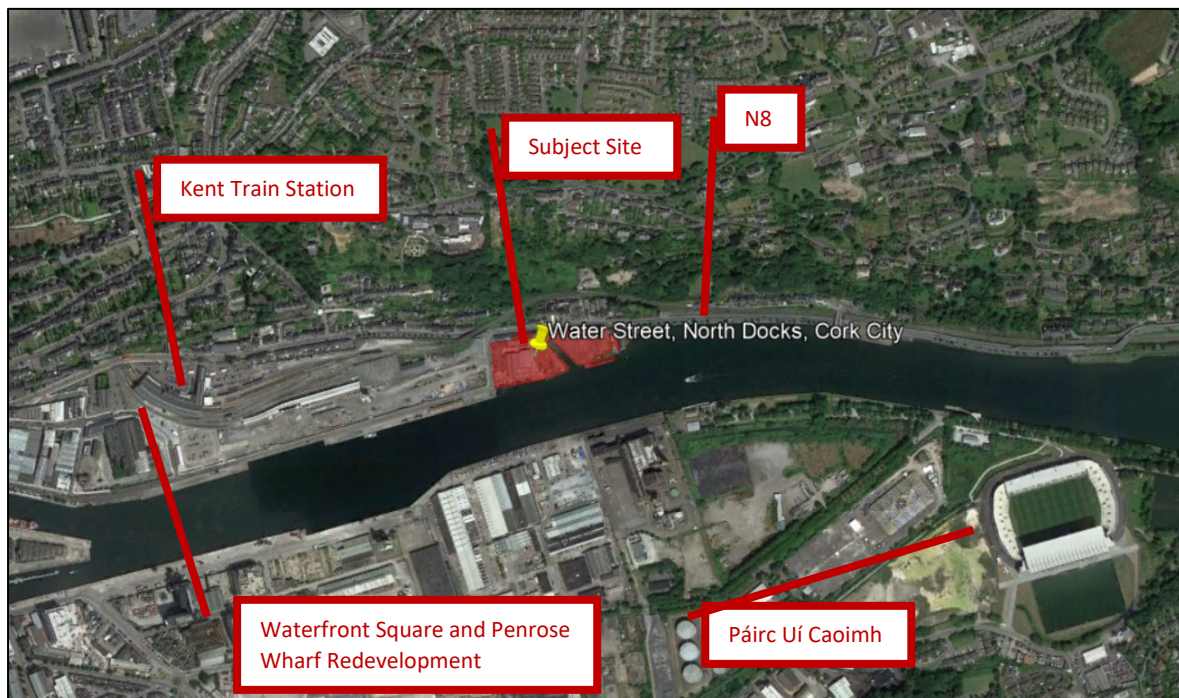


Figure 2.0 – Aerial view of the subject masterplan site. [Source: Google Earth, indicative site boundary annotated by Tom Phillips + Associates, 2021].

The purpose of the masterplan encompassing the wider site will be to assess the potential impact of the proposed development in a cumulative manner, to then be presented to Cork City Council for indicative agreement. The Masterplan will include several baseline assessments, that will effectively ensure the lands and their future development can take place. The Masterplan will likely set certain development parameters that will govern how the future phases of development will roll out. Several multidisciplinary assessments will likely be required in order to develop the Masterplan, for example, these may include –

- *Flood Risk Assessment;*
- *Ecological Impact Assessment;*
- *Assessment of Design Rationale and Visual Impact Assessment;*
- *Traffic and Transport Assessment;*
- *Archaeological Impact Assessment;*
- *Conservation Impact Assessment;*
- *Daylight, Sunlight and Shadow Impact Assessment;*
- *Noise Impact Assessment.*

The scope of these assessments can be agreed with Cork City Council at a later date. The masterplan will ensure the delivery of the wider land holding, on a phased basis, and is to be agreed with Cork City Council at a later date, through the planning application process. As noted above, priority will be sought for the delivery of the eastern site.

3.0 POLICY CONTEXT

National Planning Framework (Ireland 2040 – Our Plan)

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, large-scale*' 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 should be performance-based, to ensure well-designed, high-quality outcomes. 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.

Higher density development at this location would inherently comply with the overarching themes of the *National Planning Framework*, by proposing a compact well-designed sustainable form of development on an existing brownfield, 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.

Southern Regional Assembly: Regional Spatial & Economic Strategy (2020)

The *Regional Spatial & Economic Strategy (RSES)* was published by the Southern Regional Assembly (SRA), which is part of the regional tier of governance in Ireland. The Region covers 9 counties including Cork, with three sub-regions or *Strategic Planning Areas (SPAs)* including the *Cork Metropolitan SPA*. The RSES is a strategic plan that 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 and the *National Development Plan (NDP)*.

The RSES provides a strategic vision, a settlement strategy, an economic plan, an environmental strategy, a transport plan, a vision for quality of life, a utilities plan, and a strategy for the implementation, monitoring and evaluation of the above. It notes that the Region is experiencing rapid population decline in certain areas, including parts of Cork City and county. Changing age structures are forecast, with a significant (56%) increase in those aged over 65 expected by 2031. There will also be a significant increase in the 15-24 years age cohort (26%).

The overall strategy for the region comprises of 11 *Strategy Statements*. These include *‘harnessing the combined strength of [the Southern Region’s] 3 cities as a counterbalance to the Greater Dublin Area, through quality development, regeneration and compact growth’*, *‘strengthening and protection the region’s [...] built heritage’*, and *‘safeguarding and enhancing our environment through sustainable development’*.

Delivering ambitious and sustainable growth targets for the cities of the region, creating green and highly liveable metropolitan areas, and revitalising urban areas and spaces through creative and regenerative placemaking in order to deliver on compact growth and housing need are all central to achieving the goals of the Region’s Strategy.



Regional Policy Objective (RPO) 10 highlights the region's commitment to compact growth. In particular, initiatives that facilitate the regeneration of derelict buildings and vacant sites for the provision of high-quality environmentally friendly NZEB housing are promoted. Greater density schemes encompassing sustainable design and an element of green infrastructure on key strategic sites are deemed to be appropriate.

The purpose of the Strategy is to support the implementation of *Project Ireland 2040* through providing a long-term strategic planning and economic framework for the development of the Regions. The RSES includes a *Metropolitan Area Strategic Plan (MASP)* to ensure a steady supply of serviced development lands throughout the City's Metropolitan area to support Cork's sustainable growth and continued competitiveness.

The subject sites are located in the area identified as the '*Cork City Docks*' within the Cork Metropolitan Area. Within the Cork City and Suburbs area, the RSES supports the redevelopment of infill, brownfield and underutilised lands for higher density living, with a minimum of 50% of all new homes to be provided within the existing built-up area of Cork City. The integration of transport and land use, as well as the accelerated provision of housing are considered integral to the future strategic development of Cork City. Effective land management is crucial in this regard.

Placemaking initiatives, which incorporate green infrastructure and natural assets, are actively promoted in Cork's *MASP Policy Objective 17*. Integration between green spaces throughout the city, to create an enhanced regional network of scaled park areas is important for the liveability of the metropolitan area. The provision of such amenities is integral to the creation of high-quality, sustainable urban settlements, and should be ensured through cooperation between stakeholders. We note that the proposed zoning designation has regard to this objective.

The subject sites, when brought forward for development, will contribute to the sustainable development of Cork City in line with the objectives of the RSES and the Cork MASP. The subject sites, which are well situated in close proximity to Cork City Centre, will be well-connected to the City via existing and proposed pedestrian, cycle and public transport links. In addition, there are a number of key employment centres in close proximity.

A potential mixed-use development, with an emphasis on the delivery of residential units will incorporate an important element of Cork's dockland regeneration, and while safeguarding and enhancing cherished elements of the extant landscape quality, can provide high-quality, sustainable city-living options for Cork's growing population.

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

The *Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities*, (2009) and its associated document *Urban Design Manual – A Best Practice Guide* (2009) illustrate essential criteria for sustainable urban residential development and describes how a scheme can integrate seamlessly into a site, having regard to its surroundings and thus presenting the best possible residential design scheme.

These *Guidelines* provide national guidance in relation to the appropriate locations for the siting of higher density residential development, having regard to the locational characteristics of the lands in question. Section 5.7 identifies ‘brownfield’ sites within city or town centres, as sites of significant redevelopment potential at increased densities.

Regarding public transport corridors and residential density, Section 5.8 of the *Guidelines* states;

‘Walking distances from public transport nodes (e.g., stations/halts/bus stops) should be used in defining such corridors. It is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1 km of a light rail stop or rail station. The capacity of public transport (e.g., the number of train services during peak hour) should also be taken into consideration in considering appropriate densities.’ [Our Emphasis]

The subject sites are currently served by a number of different bus routes and is in close proximity to Kent Train Station. Should the subject sites be brought forward for development, prospective residents of the sites would benefit from numerous transit options, which will ensure a significant level of sustainable connectivity with Cork City and its environs, as well as with Cork Airport. Section 5.9 of the *Guidelines* states the following regarding density of Infill Residential Development;

“Potential sites may range from small gap infill, unused or derelict land and back land areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.

The design approach should be based on recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.”

In this respect, we believe the wider subject site constitutes a brownfield, urban site suitable for delivering compact growth and associated increased densities and height would be appropriate in this location. Should the wider site be brought forward for development, a number of assessments would be produced to address the various contributions of the subject proposal to the wider townscape. The increased residential density of this development is considered compliant with the *Guidelines* and is both appropriate and sustainable.

Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018)

These *Guidelines* seek to promote high density apartment development on residentially zoned land in appropriate locations in line with the above referenced NPF overarching policies in relation to encouraging residential development within existing urban settlements.

The wider subject site accords in full with the locational characteristics deemed appropriate for this form of development in the *Guidelines* being located in a ‘central and/or accessible urban location’ within walking distance (up to 15 minutes or 1,000 - 1,500m) of significant employment locations.. The sites are also within easy walking distance to a high-frequency urban bus service.

Section 2.23 of the *Guidelines* note that publication of *The National Planning Framework (NPF)* has signalled a move away from rigidly applied, blanket planning standards in relation to building design, in favour of performance-based standards to ensure well-designed high-quality outcomes. In particular, general blanket restrictions on building height or building separation distance that may be specified in *Development Plans*, should be replaced by performance criteria, appropriate to location, as outlined above.

The wider site is located within a major employment node (Cork City), which employs c. 102,000 people (Census 2016), and is within easy walking distance of high frequency bus routes and a number of local employment centres. In such locations, there is no upper residential density limit.

It is considered that given the wider site’s superb locational characteristics proximate to high quality bus and rail services and an established social infrastructure, delivery of the subject sites would inherently accord with National and Regional sustainable planning principles particularly in relation to the promotion of more compact and efficient forms of urban development on brownfield sites and significantly increased residential densities in appropriate locations. This is in line with the NPF and the 2018 Apartment Design Guidelines.

Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The *Draft Plan* outlines the target density of the wider site to be 200 no. dwellings per hectare. Furthermore, the general height target is 6 no. storeys, with a general range allowance for 4 – 8 no. storeys. We believe that the building height guidance, when combined with the density targets may conflict with wider sustainable development policies outlined in the *Draft Plan*, as expected of Cork City Council under the wider national and regional planning policies and guidance outlined above.

The suggested approach in the NPF and the above referenced apartment and building height guidelines regarding the flexible application of planning standards for well-designed proposals is particularly notable in respect of any potential development at these sites. In this regard, it is considered that the wider subject site is capable of easily accommodating the additional height without giving rise to any significant adverse planning impacts in terms of daylight, sunlight, overlooking or visual impact, subject to assessment.



The subject development can be considered strategic in nature, as it complies with the overarching themes of the NPF by allowing for a compact, well-designed, sustainable form of residential or mixed-use development on an underutilised urban site, located in close proximity to a range of social and commercial facilities and public transport services. Development would accord with the NPF's aims to consolidate Cork through the development of underutilised, infill sites in locations that benefit from high quality public transport links.

At present, the lands of the subject sites are underutilised. This is not a sustainable use for the lands acknowledging the current housing crisis, and is counter to the site's zoning objective, as well as national policy to provide additional housing in existing built-up urban areas.

The proposed development would, upon delivery, play an important part of the overall solution to the housing crisis, by providing units through sustainable, compact growth in a suburban site that is well connected to public transport, existing employment opportunities and supportive social infrastructure.

4.0 ASSESSMENT OF DRAFT HEIGHT AND DENSITY POLICY

As outlined above, numerous national and regional planning policies support increased height and density to allow for more compact and efficient forms of urban development on brownfield sites. The building height guidance of between 4 - 8 no. storeys, and a c. 200 units per hectare density target, as outlined in the *Draft Plan*, is in our opinion too low and should be increased. This is particularly relevant on these sites when considering a proportion of the eastern site in particular would have to effectively be sterilised for development due to the public open space designation around the existing slipway.

We note the national shift in policy away from general blanket restrictions on building height that may be specified in Development Plans, should be replaced by performance criteria, appropriate to location. Should Cork City Council insist on maintaining the height guidance as currently outlined, we would suggest that the lands to the east of the slipway in particular should be considered for taller (c. 15 no. storey), landmark or gateway development for the City, subject to design and assessment. This would be appropriate in this instance due to the strategic location of the sites as an entrance point to the City as one approaches from the River or N8, but also from the proposed new bridge connection to the South Docks redevelopment scheme.

It is submitted that the subject lands are suitable to provide for sustainable development, which would support the enhancement and augmentation of facilities and services available in the wider area and accommodate the increasing population of Cork City, as envisaged in the *Draft Plan*.

5.0 ACCESS ARRANGEMENTS AND DESIGNATIONS

The *Draft Plan* notes objectives for the development of a new bridge connecting Water Street to the South Docks, as well as delivery of a cycle and pedestrian greenway. As noted in Figure 5.0 overleaf, the *Draft Plan* also provides for creation of a new arterial street, running parallel to the greenway, to the west of the sites.

As noted above, priority for phasing the delivery of the sites should be given to the eastern element. In the context of the housing crisis, consideration should be given to an allowance for a vehicular entrance / exit from the eastern site (which is in separate ownership to the western site) directly onto Lower Glanmire Road to facilitate delivery of badly needed homes, without requirement for purchase of adjoining lands. It is believed that c. 200+ no. units could be delivered on the eastern site in isolation. This is outlined in greater detail in the enclosed Engineering Submission, prepared by NRB Consulting Engineers.

In addition, we request Cork City Council prioritise delivery of the proposed arterial and local streets, as outlined in the *Indicative Transport Map*, through the Irish Rail (Kent Station) lands and any required Compulsory Purchase Orders, if necessary. This infrastructure, in combination with the proposed bridge are essential to unlock the potential of the subject sites. This infrastructure would promote and improve pedestrian/cycle connectivity to the city centre in a safe manner. It would also increase activity and assist in promotion of passive surveillance of the area.

We also request that clarity is provided in the *Development Plan* in relation to the physical delivery of both the street and the bridge. This is to clarify whether any of the subject sites' lands are required to facilitate their delivery.

While we understand it is an objective of the Local Authority to deliver these facilities, we would also request a clear limit on the width of the riverside lands required to deliver the greenway traversing the site on the east / west axis. This is to ensure that the land can instead be prioritised for the delivery of housing. Clarity on minimum building setbacks from this greenway should be distinctly provided.

As noted above, an engineering assessment in relation to access arrangements on site is provided in the enclosed submission prepared by NRB Consulting Engineers.

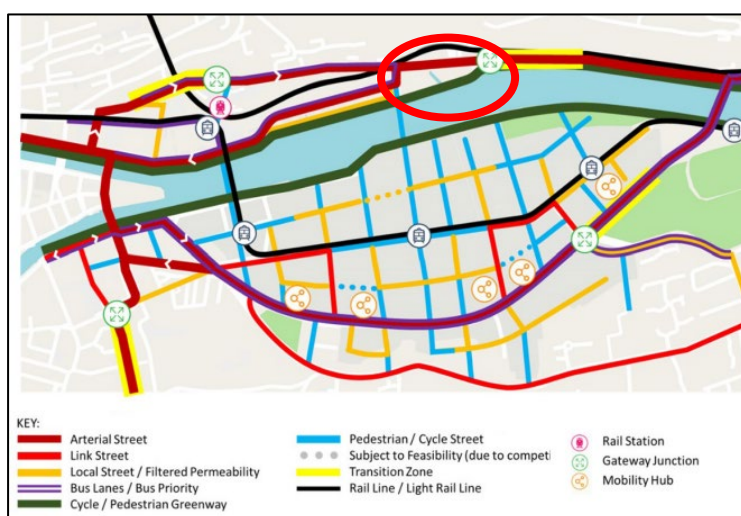


Figure 5.0 - Indicative Transport Network Map. (Indicative subject site marked with a red circle.) [Source: *Draft Cork City Development Plan Volume 2, Figure 10.5. Cropped by TPA, 2021*].

6.0 CONCLUSION

JMCM Properties Limited and James McMahon Limited are committed to the delivery of a mixed-use, substantially residential development on the subject sites. As described above, however, the current blanket height and density restrictions may limit the potential of the sites in a sustainable development context. We request that consideration is given to the submission outlined above in relation to:

- 1. The strategic importance of the sites as landmark or gateway sites;*
- 2. To ensure that development management policies outlined in the Draft Plan allow for the sustainable development of the sites, namely height and density policies;*
- 3. To ensure that supportive infrastructure is provided to enable the development of the sites;*
- 4. To request that some of the designations outlined in the Draft Plan pertaining to the sites and their context are clarified.*

In closing, it is respectfully requested that the Planning Authority consider this submission for the reasons outlined above. We look forward to acknowledgement of receipt of this submission in due course. Please revert with any queries to the undersigned.

Yours sincerely,



Órla Casey
Senior Planner
Tom Phillips + Associates

Encl.

30 Sept 2021
21-114/SN

NRB Consulting Engineers Ltd
1st Floor
Apollo Building
Dundrum Road
Dundrum
Dublin 14

+353 1 292 1941
info@nrb.ie
www.nrb.ie

Tom Philips + Associates
Suite 454 + 455
No. 1 Horgan's Quay
Waterfront Sq.
Cork City
T23 PPT8

For the Attention of Orla Casey

Dear Orla,

**LOWER GLANMIRE ROAD, DEVELOPMENT PLAN SUBMISSION – RESIDENTIAL SITE
REVIEW OF TRAFFIC/ROADS ISSUES**

Following your instructions and receipt of the existing site plans, we have undertaken a review of the Traffic/Transportation and Roads issues associated with the site at Lower Glanmire Road, Cork City.

As you are aware, Traffic/Transportation/Roads is NRB's specialist area, and we do not offer advice in other fields of Consulting Engineering.

We have reviewed the site and its ability to accommodate a residential apartment development under the following broad headings:



- Site Location,
- Receiving Environment,
- Car Parking Quantum,
- Assessment and Quantification of Traffic Generation of the likely site usage based on the TRICS Database (V7.8.3),
- Review/Assessment of Vehicular Access Options
- Conclusions.

1 – Site Location

The subject Site is located on the Lower Glanmire Road, adjacent to and east of Cork City Centre. A site location plan is included below as Figure 1 for ease of reference. There is an existing gated access to the site from Lower Glanmire Road.

Based on Google Maps, the site is ~8 minute walk or ~3 minute cycle from Kent Train Station and ~17 minute walk or ~5 minute cycle from Cork Bus Station and the heart of Cork City Centre. There are also relatively high frequency bus services passing the site on the Lower Glanmire Road, along with recently installed cycle facilities.

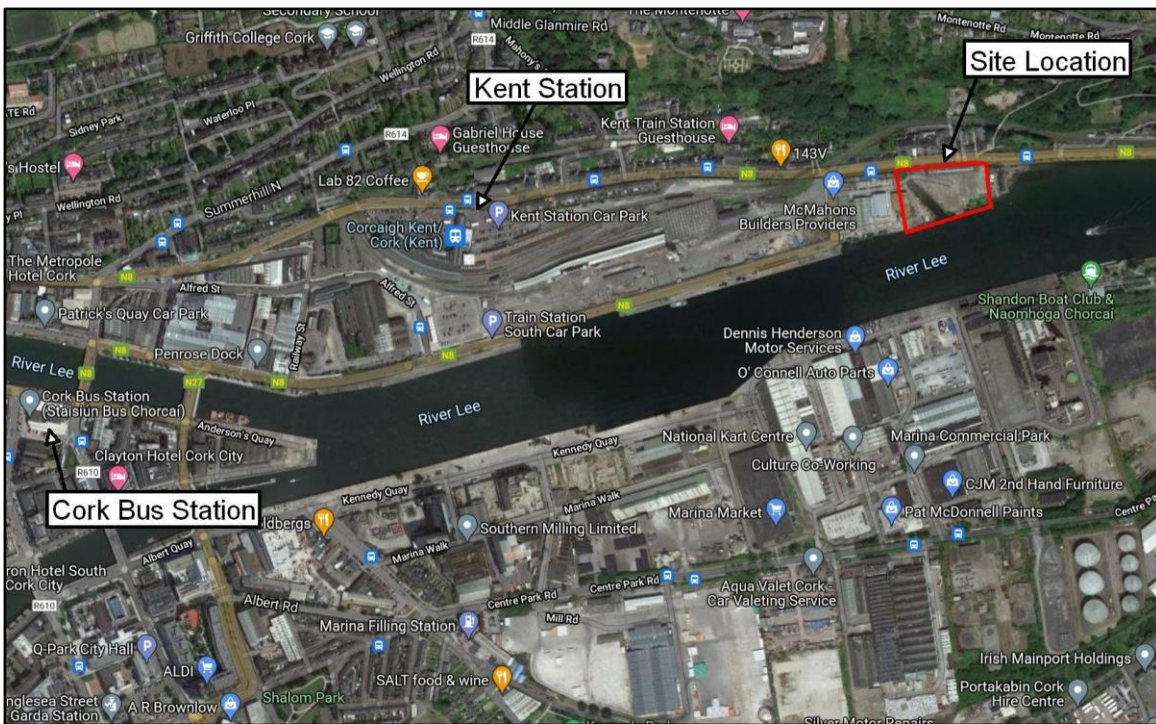


Figure 1 – Site Location

2 – Receiving Environment

The site is bound to the south by the River Lee, to the east by other residential properties, to the north by the Lower Glanmire Road, and to the west by the McMahon Builders Providers.

Whilst it is anticipated that the adjoining McMahon Builders Providers site will be redeveloped in the medium to longer term, there is an opportunity to deliver much need residential development on this city centre site in the short term, once access is facilitated from the Lower Glanmire Road.



Redevelopment of the McMahon Builders Providers would require the identification of a suitable alternative site for the business, obtaining planning permission & relocation of the Builders Providers, and is understandably a longer-term delivery.

Providing access from the Lower Glanmire Road to the subject site will allow the delivery of homes which will be independent of the McMahon Builders Providers lands.

Lower Glanmire Road is classified as a National Road N8. At this location, the Lower Glanmire Road is well within the city limits, consisting of a wide single carriageway road provided with footpath along both sides and a cycle lane. It is subject to a 50kph urban speed restriction at the site. Images showing the quality of the road, cycle lane and footpath at the existing gated access are included below as Figure 2 & 3.

Based on site measurements, the new cycle lane is typically 2m wide along the site frontage on Lower Glanmire Road and the footpath is ~2.4m in the vicinity of the existing gated access. The overall width of the gate opening is ~7m wide.



Figure 2 – Lower Glanmire Road - View West with existing Site Access on LHS



Figure 3 – Lower Glanmire Road - View East with existing Site Access on RHS

An Urban Road of this nature has a free flow link capacity of approximately 800 to 1,000 PCUs per-direction per-hour. In this regard, we would not anticipate that the carrying capacity of Lower Glanmire Road would constitute a constraint to the site development for a low traffic generating Residential Apartment development.

It is accepted that the capacity of any road is generally limited by the capacity of road junctions along its length, and in light of the sites very close proximity to the town centre, and based on our experience of traffic conditions, we would not expect this to represent a barrier to development.

A review of the Road Safety Authority (RSA) online collision database indicates that there are no untoward significant accidents on the affected stretch of Lower Glanmire Road adjacent the site. An extract from the RSA on-line collisions record is included below as **Figure 4**.

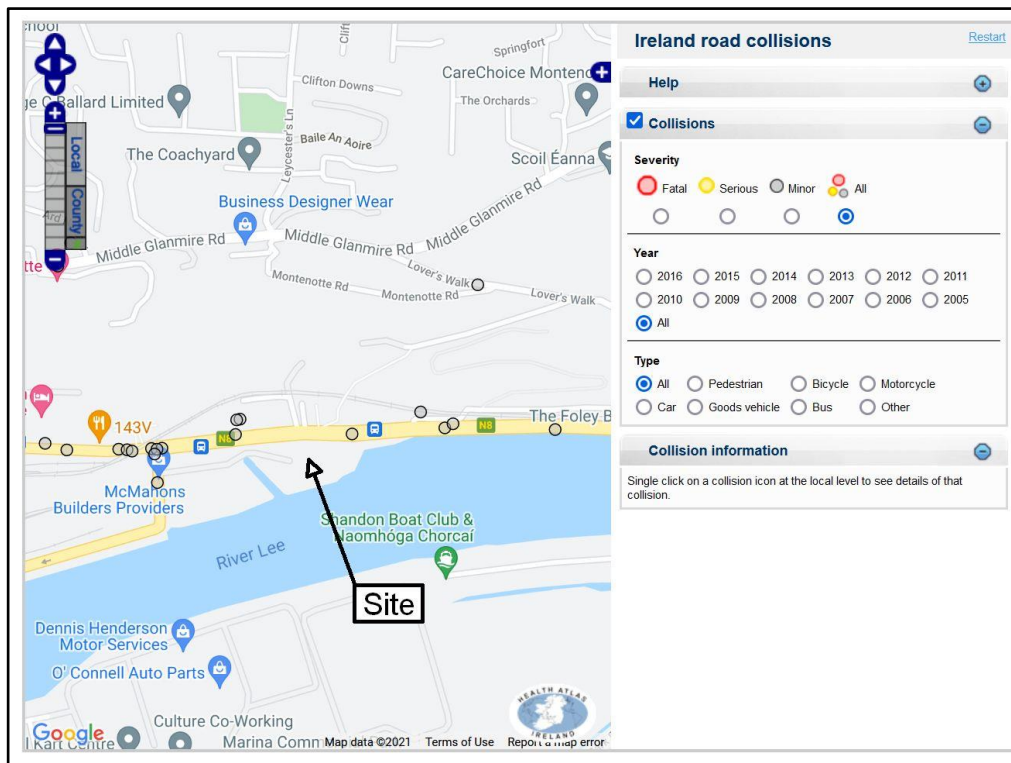


Figure 4 – Extract RSA Collisions Database & Site

3. Car Parking Quantum

Within the Cork City Development Plan 2015-2021, the Cork City Council area is divided into three zones for the purposes of car parking control based on each areas accessibility to mass transit, cycling and walking. Residential car parking standards for both residential and non-residential developments are set out in Table 16.8. These standards are maximums in order to constrain car trip generation and promote patronage of "green" modes of transport.

These zones are shown on Cork City Development Plan 2015-2021 - MAP 11 - Car Parking Zones enclosed. Parking Zone 2A & B occurs alongside public transportation corridors and within "Local Centres". Fewer car parking spaces are required in Zone 2A e.g. in areas with a mass transit system such as at Kent Station. The site is adjacent to Zone 2A.

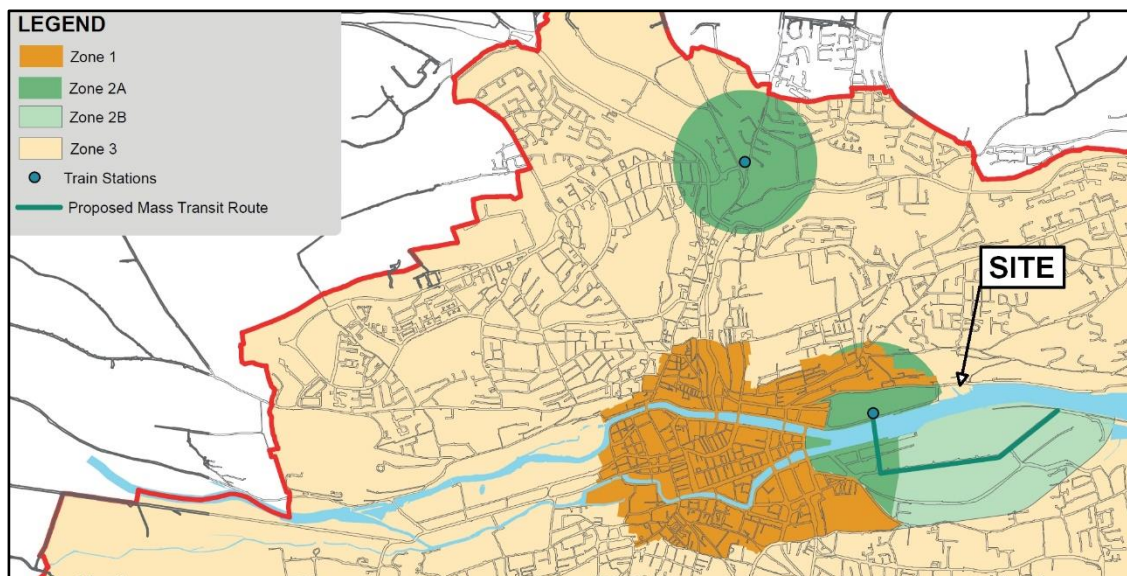


Figure 5 – Extract MAP 11 - Car Parking Zones vs Site Location

As noted above, the site is ~8 minute walk or ~3 minute cycle from Kent Train Station and ~17 minute walk, or ~5 minute cycle from Cork Bus Station, and the heart of Cork City Centre. There are also relatively high frequency bus services passing the site on the Lower Glanmire Road along with recently installed cycle facilities. The site is ideally located for reduced car parking standards in order to constrain car trip generation and promote patronage of "green" modes of transport.

This limited car parking provision would include Car Club Spaces, Mobility Impaired Spaces, and electric charging spaces.

The recently adopted 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' updated Dec 2020, updates previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply and projected need for additional housing supply out to 2020, the Government's action programme on housing and homelessness Rebuilding Ireland & National Planning Framework Ireland 2040, (subsequent to 2015 guidelines).

These new guidelines address car parking and include an objective to 'Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.' Under Car Parking - Section 4.18 the guidelines acknowledge that the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity & accessibility criteria.

Under Section 4.19 the guidelines note that in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be **wholly eliminated or substantially reduced**. Specifically, Paragraph 4.19 states:

"Central and/or Accessible Urban Locations In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such as rail and bus stations located in close proximity".



In terms of the stated Policy, the subject site meets all the requirements for significantly reducing the provision of Private Car Parking, under the headings:

High Density Development	✓
Comprising Wholly of Apartments	✓
Central Location	✓
Well Served by Public Transport	✓

In terms of *specific measures* which enable car parking provision to be lowered, any scheme on this site would include the following.

- The Active Management and Marketing of the Development from the outset as '**Reduced Car Dependency**',
- Within walking distance/close proximity to Kent Station, Cork Bus Station and the City Centre employment, services and retail zone,
- Car Club and Bike Club available at the development,
- Generous Cycle Parking and Cycle Storage

In this case we therefore believe it is appropriate that this site would be included in the Car Parking Zone with reduced car parking standards within the upcoming Development Plan (eg Zone 2A as adjacent to the site in the Current Development Plan) where reduced car parking standards are promoted and supported in order to constrain car trip generation and promote patronage of "green" modes of transport.

4 – Traffic Generation – Residential Apartment Scheme

It is anticipated that this site could accommodate in the order of ~200 or more apartments. The Trip Rate Information Computer System (TRICS) database is ordinarily used to ascertain vehicular trip generation associated with the use of any particular site. This represents industry standard practice for Transportation Assessments in Ireland. In this case, to inform the study, we have reviewed the database and provided an assessment of the Traffic Generation of the proposed apartments on a Peak Hr and 24 Hr basis (using the licensed version of TRICS V7.8.3), and this is summarised below as Table 1.

Table 1 – Summary Output from TRICS Database, Residential Housing (TRICS V7.8.3)

200 Apartments	Arrivals (PCUs)		Departures (PCUs)		Total 2-Way Traffic Generated
	Per Unit	All Units	Per Unit	All Units	
Weekday AM Peak Hr 8-9am	0.060	12	0.196	39	51
Weekday PM Peak Hr 5-6pm	0.173	35	0.087	17	52
24 Hr Traffic Gen (AADT)	1.108	221	1.179	236	457

The proposed development of ~200 or more apartments is clearly a low generator of vehicular traffic movements, with less than 52 Car Movements 2-way in each of the commuter peak hours, and with a total 24 Hr AADT of 457 PCUs. This is clearly a low volume of traffic.

This trip generation would be further reduced by limited car parking provision, which is an effective demand management measure and the promotion of modal shift to non-car modes of travel, given the location of the site relative to Kent Station, Cork Bus Station and the City Centre employment, services and retail zone.

5 - Review/Assessment of Vehicular Access Options

Whilst there is currently access to the subject site through the McMahon Builders Providers lands, as noted above, providing access from the Lower Glanmire Road to the subject site is required in the short term to allow it to deliver homes which are independent of the McMahon Builders Providers lands and operation.



There is an existing gated access from Lower Glanmire Road serving this site with dropped kerb and dished footpath and even a section of red surfacing on the new cycle lane to highlight the existing access. Based on site measurements, the new cycle lane is typically 2m wide along the site frontage on Lower Glanmire Road and the footpath is ~2.4m in the vicinity of the existing gated access. The overall width of the gate opening is ~7m wide.

A development of this scale can easily be, and indeed is best accommodated, by way a simple priority form of access junction, with single lane approaches. In this form we have no doubt that the junction will have way more than adequate traffic capacity to accommodate the development flows, with no queues whatsoever occurring.

In terms of sightlines, DMURS requires a sightline of 2.4m x 49m for a 50kph design speed on a Bus Route and we would note that this is achievable based on the information available to us at this stage.

Drawing NRB-SK-001 enclosed shows the existing gated access which could serve an apartment development on this site as a two-way access. There are also options to remove sections of the existing boundary wall on Lower Glanmire Road (similar to the recent car park successes to Kent Station) to provide for alternative two-way access. There is also the option of creating one-way accesses and circulation within the site. These would be subject to detailed design and planning applications but the sketch shows that access options are available.

We conclude that there is no capacity or safety issue in terms of creating a safe and appropriate form of access as suggested on NRB-SK-001.

It NRB's view, the proposed residential development site can be designed to be consistent with both the principles and guidance outlined within the *Design Manual for Urban Roads and Streets* (DMURS, May 2019).

Through an integrated design approach, this approach seeks to implement a sustainable community connected by well-designed streets footpaths and cycleways, which combined deliver attractive, convenient and safe access in addition to promoting modal shift and viable alternatives to car based journeys.

6 – Conclusion

We have reviewed the development plans in the context of the site location and we comment as follows; -

- The site is ~8 minute walk or ~3 minute cycle from Kent Train Station and ~17 minute walk or ~5 minute cycle from Cork Bus Station and the heart of Cork City Centre with easy access to shops, schools, employment destinations and services, and in this regard is clearly ideally located in terms of the potential for sustainable living.
- A safe and appropriate form of vehicular access is achievable from Lower Glanmire Road.
- An appropriate safe sightline is achievable.
- The internal layout of the development can be designed to comply with DMURS and with best practice in design terms,
- The traffic generated by ~200 apartments can easily be accommodated on the local road network, particularly through limited car parking provision, which is an effective demand management measure and the promotion of modal shift to non-car modes of travel, given the location of the site relative to Kent Station, Cork Bus Station and the City Centre employment, services and retail zone.

Following our review, we see no Traffic/Transportation or Roads related problem whatsoever which would prevent the site being zoned for the Residential Use as proposed with an access provided off Lower Glanmire Road.



Yours sincerely,

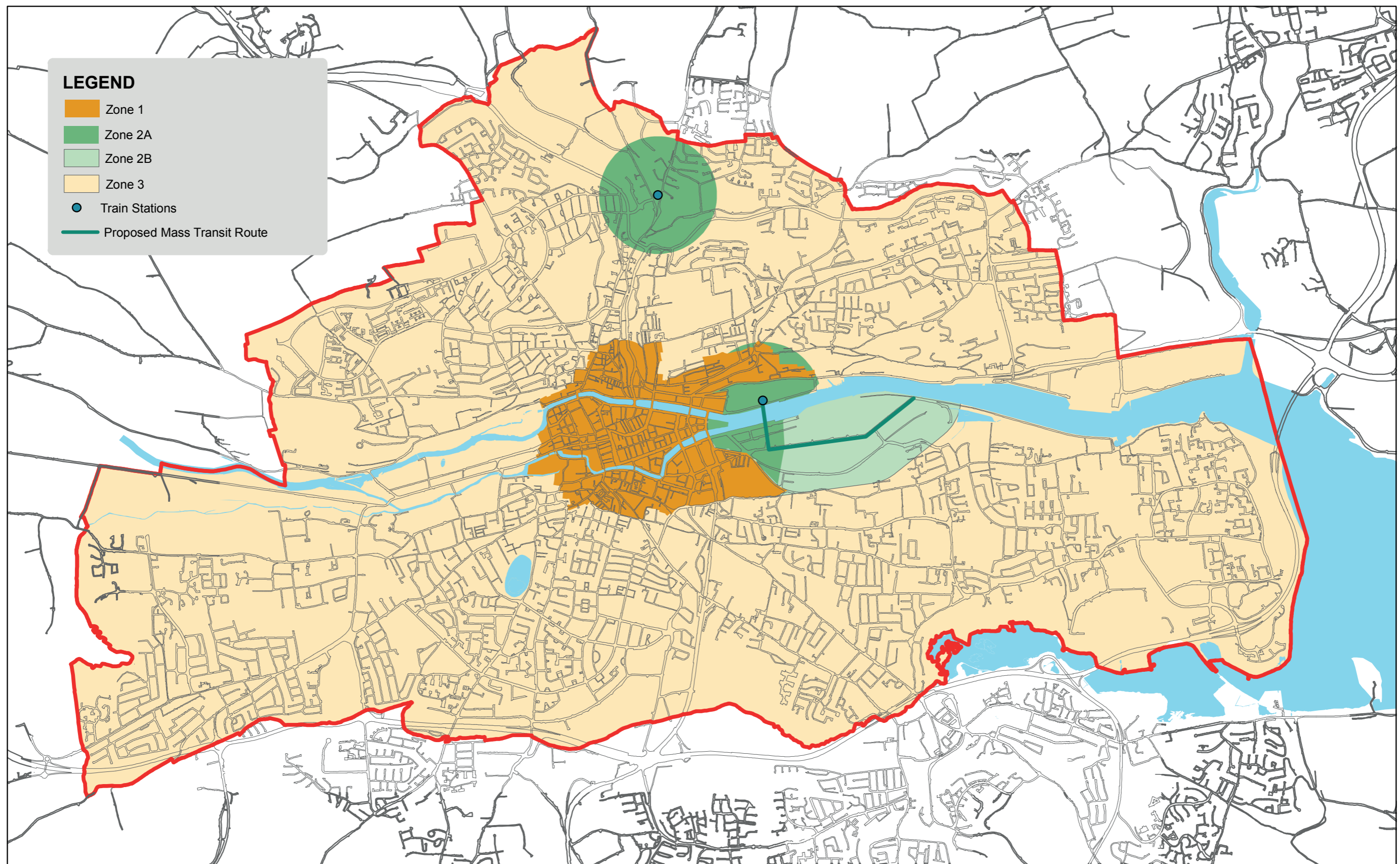
A handwritten signature in blue ink that reads 'Seamus Nolan'.

Seamus Nolan
Chartered Engineer
Director

Enclosures:

NRB-SK-001
Cork City Development Plan 2015-2021 - MAP 11 - Car Parking Zones

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Zoomable map available on our website: www.corkcitydevelopmentplan.ie