



Strategic Housing Development - Statement of Consistency

Montip Horizon Limited

Jacob's Island, Mahon, Cork

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Introduction

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

The Jacob's Island and wider Mahon area has experienced significant growth in recent decades and has become an important location for employment, retail and population growth in Cork City. The proposed development represents the next phase of development for Jacob's Island which will assist in the achievement of national, regional and local policy objectives.

The proposed development will involve the construction of 413 no. apartments and ancillary neighbourhood centre in 5 buildings, which will complete Phases 8 and 9 of the original masterplan for the lands. The proposed development ranges in height from 6 to storey 8 storeys with a 25 storey tall building.

This report will demonstrate that the proposed development is consistent with both recent and long established National, Regional and Local policies for this area. Specifically, it will demonstrate that the proposal is consistent with the ambitious aims of the National Planning Framework, Rebuilding Ireland and will make a significant contribution towards Pillar 3 of the Government's Action Plan to deliver more housing. In addition, it will outline how the proposed development has full regard to the evolving planning history and policy aims for this area, as well as the precedent set by previous An Bord Pleanála decisions in relation to the subject lands.

The statements of consistency have been compiled in a hierarchy according to National, Regional and Local Policy. In accordance with the Board's *Guidance for Prospective Applicants* this statement is intended to be clear and concise. A summary of the relevant policy from each publication has been provided with specific planning policies and objectives highlighted with a green background. The applicants' statements of response to the various policies and objectives are highlighted with a grey background.

National Policy

Project Ireland 2040: National Planning Framework

The recently published National Planning Framework (NPF) identifies that five cities including Cork will cater for 50% of the growth in the country's population by 2040, which is expected to be in the region of 1 million people. The NPF sets ambitious targets for Cork City and suburban area with population growth of 105,000 – 125,000 and a minimum population of 314,000 by 2040. This will require a population growth rate of 50 – 60%.

We consider that the following are the key National Policy Objectives which relate to Cork City and the development of this site.

National Policy Objective 8

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 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

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

Key future growth enablers for Cork include:

Identifying infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects.

The plan also outlines 10 national strategic outcomes which include:

- Compact Growth
- Sustainable Mobility
- Enhanced Amenity and Heritage

- Transition to a low carbon and climate resilient society
- Access to Quality Childcare, Education and Health Services

In relation to Cork Metropolitan Area, it is intended to develop a Metropolitan Area Strategic Plan (MASP) including Cork Harbour, which will be prepared through the Regional Spatial and Economic Strategy process. This will also build on work previously undertaken as part of the non-statutory Cork Area Strategic Plan (CASP), addressing both the CASP Study Area and North and West Cork.

National Strategic Outcome 2

Enhanced Regional Accessibility

Inter Urban Roads

Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements;

The impact of the proposed development on the carrying capacity of the adjacent N40 has been assessed in a Traffic and Transportation Assessment, the methodology for which has been agreed with Cork City Council and it has been drafted in accordance with the relevant Guidelines. The Traffic and Transportation Assessment concludes that the proposed development will have no impact on the carrying capacity of the national road.

The proposed development is plan-led, will provide residential accommodation at a location which will promote sustainable travel patterns and will not have a negative impact on the carrying capacity of the N40.

National Policy Objective 64

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

The proposed development is consistent with the strategic aims of the NPF as it will result in a high-density development on an infill site in a suburban area which is supported by public realm and urban amenity. Jacob's Island has existing strong walking, cycling and public transport linkages to the adjacent Mahon District Centre, City Centre and beyond, as demonstrated in the accompanying connectivity map contained in Appendix A, Jacob's Island's connectivity to the Mahon District Centre and City Centre is demonstrated by Census 2016 statistics. The existing apartment developments on Jacobs Island form 2 separate small areas for the purpose of the Census. Analysis of the small area data demonstrates that over 30% of residents in both of these small areas travel to work by sustainable modes including walking, cycling or public transport. This compares favourably with various other small areas in the Mahon area where rates of commuting to work by car are generally higher. The maps below illustrate the results of the commuting survey in Census 2016 for several of

the small areas in Mahon and Jacobs Island. The green figure represents those traveling on foot, by bicycle or by public transport, while the orange figure represents those travelling by car. Outliers such as van owners, working from home etc were excluded from these figures.

The proposed development will further encourage this sustainable modal share among future residents. The scheme will be located at an attractive waterside location in close proximity to the popular Lough Mahon public cycle and walkway which connects the City Centre and Rochestown via the old Passage West railway line greenway. Jacob's Island is within walking distance of Mahon District Centre, which includes retail and healthcare facilities and functions as a major employment centre. The District Centre is accessible from Jacobs Island on foot or by cycling along dedicated cycling and walking routes, which are separated from local road network.

The proposed development will be consistent with National Policy Objective 8 which aim to increase Cork city and suburbs to minimum population of 314,000 by 2040 and which will require a growth rate of 50 – 60%.

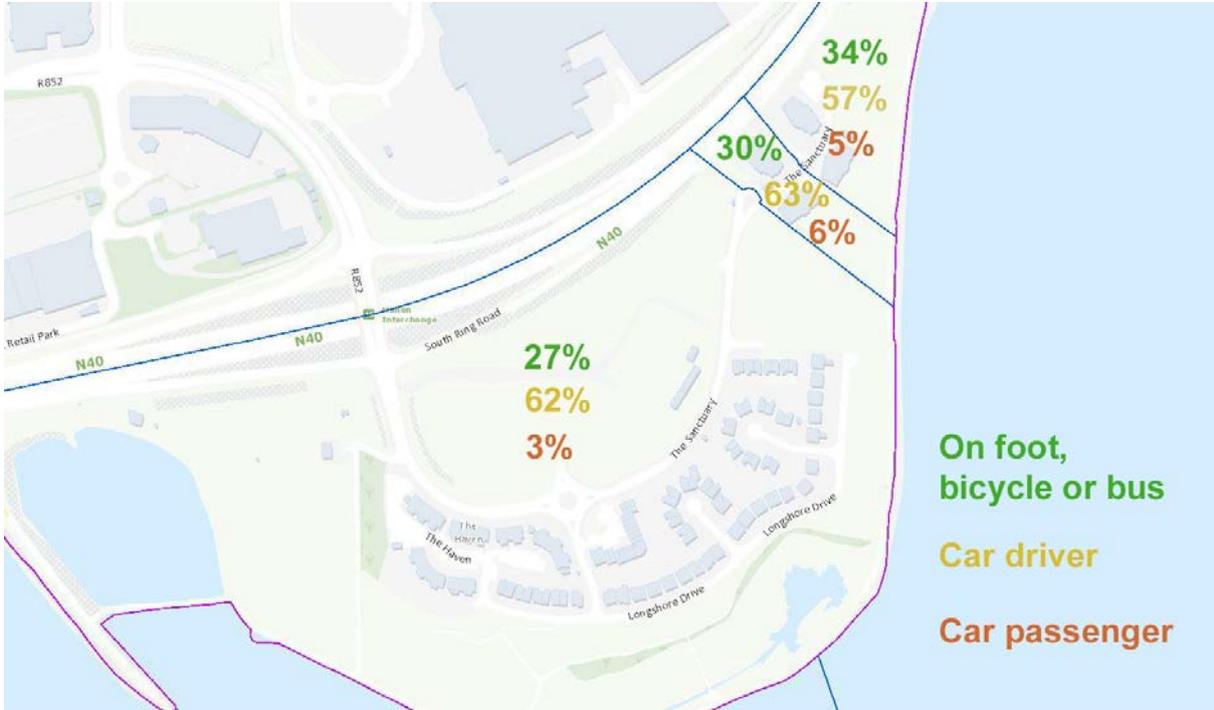


Figure 2 - Commuting figures in Jacobs Island

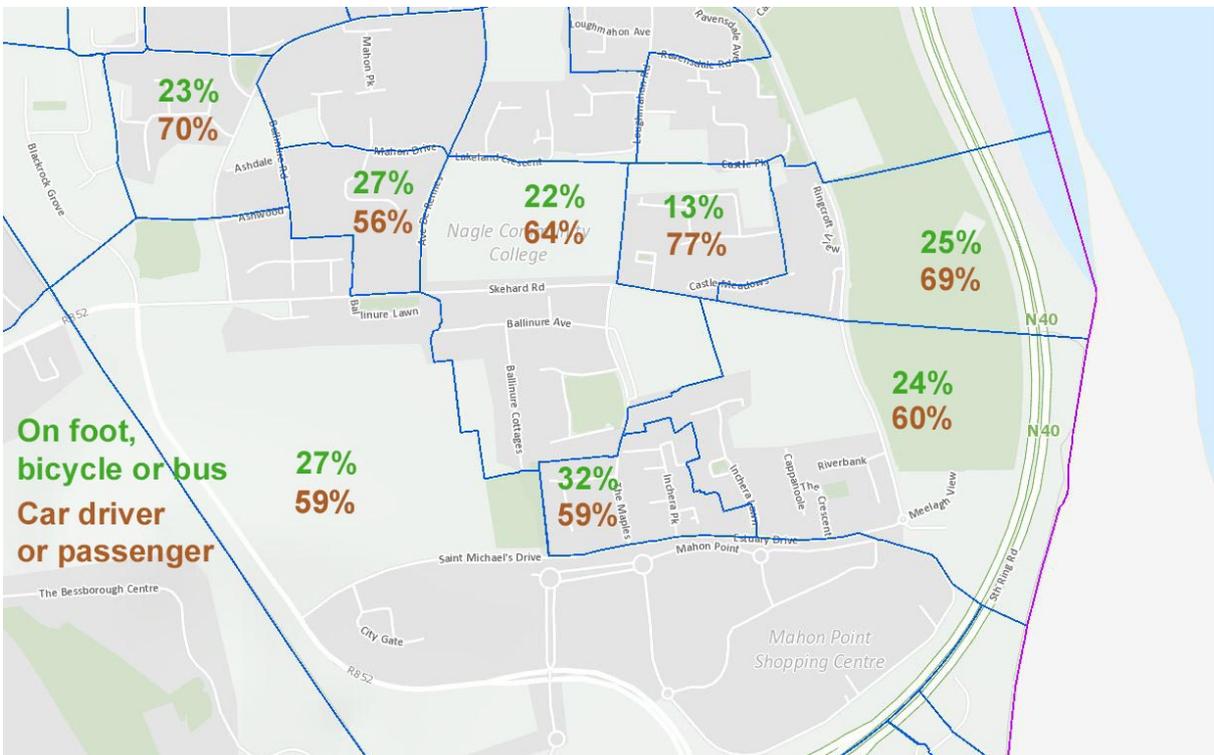


Figure 1 - Commuting figures in Mahon

National Policy Objective 74

Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.

The proposed development is plan-led is consistent and aligned with local, regional and national policy. The proposed development will assist in the delivery of national strategic outcomes.

The NPF aims to build on Cork's position as an emerging medium sized European Centre of Growth and Innovation. It outlines some of the key matters in achieving this goal including:

“an enhanced urban environment, including better housing choice and quality, new employment locations, improved public spaces and enhanced public transport as well as safe and pleasant options for walking and cycling.”

The proposed development will aim to consolidate residential development in the Jacobs Island area and introduce local services in a proposed neighbourhood centre that are currently lacking. It will contribute to a greater housing choice in the context of the severe shortages that are being experienced at the present time. As outlined above and later in this document, the proposed development is located in an urban accessible location with connectivity provided by a local network of walking and cycling routes as well as local public transport routes. As a result, we consider that the proposed development is consistent with the stated goals contained within the NPF and will help Cork achieve its ambitious population targets in a sustainable manner.

Rebuilding Ireland: Action Plan for Housing and Homelessness

'Rebuilding Ireland – Action Plan for Housing and Homelessness' includes a comprehensive five pillar approach. Pillar 3 aims to support the building of new homes and outlines the Government objective “to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs”. This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.

The plan outlines a number of key steps that should be taken to deliver on the pillar three objective including:

- Planning reforms
- Putting in place a National Planning Framework and land management actions
- Efficient design and delivery methods to lower housing delivery costs
- Measures to support construction innovation and skills

The location and suitability of the subject site, as well as proposed mix of dwellings, including social housing component, ensures that the subject proposal will contribute positively to meeting the pillar three objective of doubling the completion level of additional homes in the next four years to deliver over 25,000 homes on average per annum.

The proposed development falls under the new Strategic Housing Development planning process aimed at fast tracking the delivery of much needed housing. In addition, as we have outlined in the

previous section, the proposal is consistent with the recently published NPF and its stated aim of consolidating new population and housing growth within the footprint of the main towns and cities.

In terms of design, the scheme has been developed to provide the maximum level of residential amenity while achieving levels of density that are appropriate to the location.

Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities: Draft Update 2017

The recently published guidelines update the Sustainable Urban Housing: Design Standards for New Apartments guidelines, published in 2015. They refer to the need to significantly increase supply as a key pillar of the overarching Rebuilding Ireland Housing Action Plan. The guidelines indicate that urban areas are the most suitable locations for apartments and divide these areas into 3 categories.

Section 2.4 of the Guidelines define 'Central and / or Accessible Locations' as

- 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.

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

We consider that the proposed development site can be defined as a Central and Accessible Urban Location, that is suitable for large scale, higher density development comprising wholly apartments and as demonstrated by the Map in Appendix A as it is

- within walking distance (i.e. up to 15 minutes or 1,000-1,500m) of a significant employment location, being Mahon;
- within easy walking distance of high frequency urban bus services, being the 202 and 215/215A.

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

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based

Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

The proposed housing mix of the Jacobs Island scheme is consistent with the requirements of SPPR1 and proposes the following housing mix:

studio units – 6% 1-bedroom units – 16.9% (Combined 1-bed – 23%)
 2-bedroom units – 72.2% 3-bedroom units – 4.8%

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

Floor areas within the proposed scheme as outlined in the accompanying schedule of accommodation prepared by O'Mahony Pike Architects are all consistent with the requirements of SPPR 3

Safeguarding Higher Standards

In the interests of sustainable and good quality urban development these guidelines should be applied in a way that ensures delivery of apartments not built down to a minimum standard, but that reflect a good mix of apartment sizes. Accordingly, it is a requirement that the majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3-bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).

As detailed in the accompanying housing quality assessment, the majority of the units within the proposed scheme are in excess of the minimum floor area standards as outlined in SPPR3. The scheme is also consistent with all other minimum floor areas and standards.

Specific Planning Policy Requirement 4

The minimum number of dual aspect apartments that may be provided in any single apartment scheme shall be 33% in more central and accessible urban locations, where it is necessary to ensure good street frontage and subject to high quality design. Otherwise, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.4ha (1 acre), planning authorities may exercise further discretion on a case-by-case basis, subject to overall design quality.

Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased, either at ground level only or in conjunction with all floors in an apartment block or building, in certain circumstances.

The proposed development is consistent with the objectives contained in SPPR4 as it provides for 249 no. apartments with a dual aspect, which represents just over 60% of the overall number of units in the scheme and is well in excess of the minimum required for general residential schemes. The development is also consistent with SPPR5 as floor to ceiling heights are in excess of the minimum standards.

Urban Design Manual: A Best Practice Guide

The Proposed Residential Development at Jacob's Island has been designed in accordance with best practice as outlined in the 2009 Urban Design Manual. The Manual outlines 12 criteria that should guide urban residential development in the context of the individual homes, the site on which they are located and the wider neighbourhood. The 12 criteria can be summarised as follows

- | | | |
|---|---|---------------|
| 1 | Context | |
| | How does the development respond to its surroundings? | |
| 2 | Connections | |
| | How well connected is the new neighbourhood? | |
| 3 | Inclusivity | Neighbourhood |
| | How easily can people use and access the development | |
| 4 | Variety | |
| | How does the development promote a good mix of activities? | |
| 5 | Efficiency | |
| | How does the development make appropriate use of resources, including land? | |
| 6 | Distinctiveness | |
| | How do the proposals create a sense of place? | |
| 7 | Layout | Site |
| | How does the proposal create people friendly streets and spaces? | |
| 8 | Public Realm | |
| | How safe, secure and enjoyable are the public areas? | |

9 **Adaptability**

How will the buildings cope with change?

10 **Privacy and Amenity**

How does the scheme provide a decent standard of amenity?

Home

11 **Parking**

How will the parking be secure and attractive?

12 **Detailed Design**

How well thought through is the building and landscape design?

Cork City Development Plan requires that all new developments will have regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual. A Planning and Design Statement has been produced as part of this planning application, this outlines how the proposed development achieves compliance with these guidelines. In summary, the development is compliant with the 12 urban design principles as follows:

Context

The subject infill site is located on Jacob’s Island, which is a successful and attractive residential community of approximately 330 residential homes. Jacob’s Island is adjacent to Mahon District Centre and within the South Eastern Suburbs of Cork City, as defined in the Cork City Development Plan 2015-2021.

The site is strategically located on the edge of Lough Mahon and enjoys excellent walking, cycling and public transport links to the adjacent Mahon District Centre and Cork City Centre. Its location adjacent to the N40 also provides connectivity by road to the areas beyond Cork City.

Jacob’s Island enjoys vast views out over the Lough Mahon and the existing residential community is supported by quality realm, urban amenities and connectivity to Mahon and Cork City Centre. The adjacent Mahon District Centre and strategic employment area was one of the Cork’s strongest performing areas in terms of population and employment growth during the period 2006-2016. Hubs such as Mahon Point Shopping Centre, Mahon Point Retail Park and several major industry employers make Mahon a thriving area within the Cork City environs and present sustainable and viable employment opportunities for existing and future residents of Jacob’s Island.

Connections

The main access into and out of the Jacob’s Island lands is the grade separated junction 10 of the N40 ring road which allows access to the N40 in both directions as well as to Mahon along the R852.

The area is served by the 215 and 215A City Bus route which provides connectivity to Mahon, Ballinlough, the City Centre, Blarney and Cloghroe. Extensive walking and cycle linkages are available via the looped walkway which runs along the old Passage West railway line and along the Lough Mahon waterfront, linking the site to Blackrock, Mahon and the Marina as well as to Passage West.

Public Realm

Jacob's Island has the benefit of an extensive public, waterfront park, Joe McHugh Park, which was delivered in conjunction with the existing residential development. Future residents will have the benefit of this significant amenity and in addition a high quality public realm, consisting of landscaped green spaces and shared surfaces will be delivered as part of the scheme and as highlighted on the attached proposals prepared by Ilsa Rutgers Architecture.

Inclusivity

The development proposes a range of public, communal and private amenity spaces which will be compliant with Part M of the Building Regulations.

Privacy Amenity

The development of successful residential accommodation requires a meaningful transition zone between street and apartment to ensure adequate privacy for residents. The scheme achieves this by using a landscaped buffer zone and a level difference between street and ground floor level of apartment of at least 1 metre.

Variety

A coherent and cohesive strategy will be implemented in the development of the elevation strategy and arrangement of the apartment blocks on the site. The blocks are arranged as a series of pavilions interspersed amongst landscaped parkland.

Variety will be introduced to the form through variation in roof profile as a result of the cranked form, as well as setbacks and pop-up lanterns at roof level.

Distinctiveness

A common language of fenestration pattern and balcony arrangements will be used to generate a distinctive elevation strategy throughout the scheme. This will bring pattern and rhythm to the development. Corners will be emphasised by the changing rhythms of the balconies and window sizes as they turn the corner.

Efficiency

The subject scheme addresses sustainability and an efficient use of zoned development land at the broader level of an appropriate level of density on a strategically positioned site. The strategic location of the scheme on a public transit route and within walking distance of a major employment centre, aligns with sustainable objectives of encouraging sustainable movement, reducing urban sprawl and enhancing a green economy.

Layout

Further details on the layout of the scheme are provided in the planning and design statement which forms part of this planning application.

Adaptability

The subject scheme has been designed to allow for adaptation in response to tenant requirements and market demands, studio units are arranged in pairs and have the potential to be converted to 2 bed apartment units at a later stage.

Detailed Design

Further details on the scheme are provided in the planning and design statement which forms part of this planning application.

Parking

A number of parking options are provided across the site. A single storey basement is proposed under blocks 7 8 9, with the provision of car and bicycle parking. Access to this basement is provided through the existing basement. A podium car park is located in Block 3 4, housing car and bicycle parking. Additional car parking spaces are provided at surface level.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas

The 2009 guidelines were developed by a team of consultants led by O'Mahony Pike who are the lead architects on the current proposal in Jacobs Island, with the objective of delivering high quality and sustainable developments. The guidelines outlined the common goals of housing developers, their design teams, the planning system, and the community they serve as follows:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;
- Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;
- Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;
- Are easy to access for all and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;
- Provide a mix of land uses to minimise transport demand;
- Promote social integration and provide accommodation for a diverse range of household types and age groups;
- Enhance and protect the green infrastructure and biodiversity; and

- Enhance and protect the built and natural heritage.

By virtue of its location, the proposed development at Jacob's Island has the potential to deliver on the quality of life aims of the Sustainable residential development guidelines.

- The development will be located adjacent to the attractive Mahon amenity walks, designated in the Development Plan as an area of High Landscape value, providing ready access to open space amenities as well as allowing convenient walking and cycling amenities to the local community. This access to sustainable travel infrastructure as well as the significant density of the proposal will support the development of local public transport infrastructure and will serve to minimise the usage of cars.
- The introduction of the Neighbourhood centre will provide for essential convenience retail and childcare needs for existing and future residents.
- The proposed open spaces associated with the scheme have been designed according to best proactive Urban Design principles and will include features such as shared surfaces, planting and seating areas to provide a public realm that is accessible and attractive to future residents.

The Guidelines advocate a plan-led approach in determining the site, location and nature of major new residential development and stresses the importance of Local Area Plans in particular as underpinning this approach.

As demonstrated below, we consider the proposed scheme to be consistent with the aims of the Mahon Local Area Plan as varied by the Cork City Development Plan 2015 – 2021.

The Guidelines also refer to the important role of design in delivering new residential developments, adherence to the 12 principles outlined in the Urban Design Manual.

Refer to previous section.

Design Manual for Urban Roads and Streets

- As a peninsula which does not facilitate any through traffic and is already subject to a number of traffic calming features (with an existing roundabout junction, a number of pedestrian priority crossings and the provision of entrance gates adjacent to the existing bus turnaround area), Jacob's Island already functions in a manner consistent with the ethos of the Design Manual for Urban Roads and Streets (DMURS). The proposed development will see this ethos reinforced further through the design approach adopted.
- However, there is a need to recognise that there is an existing internal road network which is in itself is not fully in accordance with the design guidance of DMURS (given that the historical development of Jacob's Island predates DMURS). Accordingly, there is a need to strike an appropriate balance between the existing layout and the proposed development.
- As the area already carries low traffic volumes and has a degree of traffic calming in place, it is not proposed to create 'shared' environments within the area around Block 10 and in front of Blocks 3&4; rather, carriageway widths and junction radii will be minimised to the greatest extent feasible.

- At Blocks 7,8 and 9, there will be no surface-level parking within the block area (with all parking to be provided underground).
- The site is already very well-served by a number of connections to pedestrian and cycle routes, with the Passage Greenway Line accessible from the existing Jacob's Island lands, and the Lough Mahon walk being accessed via four existing connections for pedestrians and cyclists. As part of this scheme, a further three connections will be created from the proposed development site to these facilities.
- There is already a dedicated bus shelter and bus stop present in a bus turnaround area within the heart of Jacob's Island, which is served by the 215 city bus service. These facilities are in a central location and are therefore very accessible to all residents.
- Mitigation measures proposed as part of this application include the creation of a number of additional links to the Lough Mahon public walk (and by extension to the Passage Greenway line) and the implementation of an inbound bus lane on the Mahon Link Road between the N40 interchange and Mahon Point Shopping Centre). These works will ensure that sustainable travel modes are both attractive and accessible to residents.
- The site's proximity to the Passage Greenway line places it at an excellent advantage to avail of the recent improvement at the junction at St. Michael's Drive (where a new ramped connection has been created between the junction and the greenway line), and the proposed upgrade of the greenway line itself (expected in 2019/2020) to widen the line and to provide public lighting, as well as the implementation of a number of new connections to the line from the road and street network along the line.
- The site will see a parking provision below the maximum levels suggested in the Cork City Development Plan, with a total of 409 parking spaces provided to serve the 413 units

Spatial Planning and National Roads, Guidelines for Planning Authorities, 2012

Similar to all recent planning guidelines a key message and principal objective is to facilitate and promote the shift to more sustainable forms of transport. Section 1.5 of the *Spatial Planning and National Roads, Guidelines for Planning Authorities* highlights that the Key Principles of the Guidelines are as follows

- Land-use and transportation policies are highly interdependent:
- Proper planning is central to ensuring road safety:
- Development should be plan-led:
- Development Management is the key to Plan Implementation:
- Planning Authorities and the National Roads Authority and other public transport bodies must work closely together:

The key recommendation and message from Chapter 2 of the Guidelines in relation to planning policy and development plan decisions is that these decisions should be evidence based. The following are identified as the 'Key Steps for Building an Evidence-Based Approach to Planning Policy Decisions'.

Step 1: Identifying and consulting with the key stakeholders in developing an integrated approach;

Step 2: Confirmation of the national and/or higher level policy context for the development plan proposals;

Step 3: Developing evidence based tools such as traffic models, including agreement between stakeholders in relation to acceptable data and assumptions;

Step 4: Identification of demand management and mitigation measures to minimise the transport impact of the plan;

Step 5: Identification of any infrastructural enhancements required and phasing;

Step 6: Agreement between stakeholders on a delivery strategy including funding arrangements.

Chapter 3 of the Guidelines deals with Development Management and Roads and outlines the following 'Key Messages'

- Development Management is the key to plan implementation.
- Planning authorities should put in place effective mechanisms to refer all planning applications on, or with the potential to affect, national roads to the NRA and also in the Greater Dublin Area to the NTA in accordance with the Planning and Development Regulations.
- Traffic and Transport Assessments (TTA) and Road Safety Audits (RSA) should be used in preparing planning applications for major development affecting national roads.
- Assessment of development proposals must take into account broader planning and development policy as well as engineering criteria, road safety and the environmental effects of national roads.
- Control of roadside and adjoining signage and lighting is an important contributor towards achieving enhanced road safety and planning authorities should use their regulatory and enforcement powers accordingly.
- Development proposals requiring physical works on the national roads network should include making provision for the payment of the appropriate development contributions in line with the requirements of planning legislation and local authority development contribution schemes.
- There should be agreement between stakeholders on a delivery strategy including funding arrangements

In accordance with one of the key principles of the *Spatial Planning & National Roads Guidelines for Planning Authorities*, the expansion of the residential community at Jacob's Island is plan led and is consistent with integrated land use and transportation policies developed for Mahon. Additional residential development on Jacob's Island of 600 – 1,530 people or 250 – 635 units in Tranche 1 (pre BRT) is Land Use Strategy 3 recommended by the Mahon Strategic Transport & Traffic Assessment, which was the strategy adopted in the 2014 LAP.

The Mahon Strategic Transport & Traffic Assessment is the most relevant and recent example of Cork City Council, TII and NTA working closely together and reaching agreement on a delivery strategy and funding arrangements to facilitate the implementation of the 2014 Mahon LAP. The delivery strategy for the Mahon LAP is based on two tranches, Tranche 1 is development which can be accommodated by existing infrastructure in advance of the BRT and Tranche 2 is development for which the BRT is required to facilitate. The completion of the residential development on Jacob's Island is Tranche 1 of the LAP and is consistent with the delivery strategy for the Mahon LAP agreed between the City Council, TII and NTA. At present the transport network is being upgraded and these upgrades which will facilitate shorter bus travel times and provide lighting on the existing Greenways are aimed to promote sustainable travel and are being funded by the NTA.

In accordance with the Guidelines the application is accompanied by a TTA, the methodology for which has been agreed with Cork City Council and a Road Safety Audit. In addition, while the TTA does not highlight the requirement for mitigation measures, a mitigation measure in the form of a dedicated north bound bus lane from the Mahon Interchange is proposed as part of the application and will be provided by the applicants. The proposed mitigation measure is supported by Cork City Council and the clarity regarding the delivery of the works is consistent with a key message contained in the Guidelines.

As the proposed development is plan-led and consistent with the integrated land-use and transportation policies for Mahon, which were developed by Cork City Council in consultation with TII and the NTA we consider that is in accordance with the *Spatial Planning & National Roads Guidelines for Planning Authorities* and that any impacts on the N40 have been addressed through the accompanying TTA and RSA.

The Planning System and Flood Risk Management

The core objectives set out in the Planning System and Flood Risk Management (PSFRM) Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders;
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The guidelines outline the two main components in flood risk assessment, namely the likelihood of flood events and potential consequences. The various stage of Flood Risk Assessment that should be carried out by Local Authorities are outlined in the guidance, the first stage of which is identification of areas at risk within development plans or LAPs.

While the LAP identifies areas of Jacobs Island as being at risk of flooding, these areas are all located to the south of the subject lands on areas that are designated open space. The proposed development lands have not themselves been identified within the Local Area Plan as having a flood risk associated with them.

The PSFRM guidelines detail the terms of the Justification Tests to be carried out in respect of development proposals which may be at risk from flooding. They provide for two levels or stages of determination which includes the initial zoning of lands for development (Stage 1) and the subsequent flood risk assessment of any proposal on such lands, where there is an identified risk of flooding (Stage 2).

Stage 1 of the Justification Test relates to Strategic Flood Risk Assessment and the appraisal of risk on development lands as part of the formal plan making process. The subject lands were zoned for development in the Mahon Local Area Plan 2014, taking account of the PSFRM Guidelines. Section 3.9 confirms compliance with statutory obligations - the assessment of fluvial, pluvial and tidal flood risks as part of the plan preparation process and subsequent application of the 'Justification Test' as part of final land use zoning decisions. The inclusion of policy objectives under Section 4.10 of the LAP corroborates overall consistency in approach with the PSFRM Guidelines, setting out the framework under which Stage 2 Flood Risk Assessments may apply.

The subject lands are not identified as being within Flood Zones 'A' or 'B' in the LAP, and as such, the satisfaction of criteria contained within the 'Justification Test for Development Management' is not required. The proposal is consistent with the principles of the PSFRM Guidelines as development is being channelled to areas which are not at risk of flooding, having regard to all available evidence on such matters.

Retail Planning Guidelines 2012

The proposed development includes provision for a small scale neighbourhood centre to serve local needs within the Jacob's Island area. In accordance we have evaluated the scheme against the Retail Planning Guidelines. One of the Key messages of the guidelines is that:

"future retail development should be plan-led following the settlement hierarchy, including the identification of retail requirements and appropriate planning policies and objectives and implementation measures aimed at securing development plan objectives."

The proposed neighbourhood centre aspect of the scheme accords with the zoning objectives of the subject lands, as outlined fully in the sections below on local planning policy. The retail offering proposed by the development will be appropriate in scale to the needs of existing and future residents on Jacobs island. The Board will note that the proposed neighbourhood centre is distinct from the already committed retail provision in the area, as accounted for in the LAP. A 2007 application for a mixed use scheme (07/32686) includes provision for 5 small retail outlets of 138 sq. m, 234 sq. m, 93, sq. m, 117 sq. m & 235 sq. m respectively (Total 817 sq. m). This permission also included 2 medical centre units totalling 527 sq. m. The 1,200 gsm referred to in the Mahon LAP (see below) is an approximation of this committed retail provision.

The proposed scheme provides for 3 no. retail units totalling 861 sq. m (590 sq. m, 142 sq. m and 129 sq. m). This is well within the Cork City Council definition of a Neighbourhood Centre as being up to 1,500 sq. m net retail sales area.

We refer the Board to the Retail Impact Assessment carried out as part of Planning Application Ref: 13/35575 by Roger Tym and Partners. The assessment concluded among other things that the new population of Jacobs Island since its first development and up to 2016 is projected to generate some €5.85 m of additional spending growth solely within Jacobs Island. Currently this spend all takes place outside of Jacob's Island because of the lack of services provided at this location. The proposed development would re-direct some of this convenience spend locally and would have the effect of reducing trip generation and unsustainable travel out of the area.

2001 Childcare Guidelines for Planning Authorities

The 2001 guidelines were published in the context of rapidly growing demand for Childcare provision and a recognition that such provision must be of a suitably high quality.

The guidelines were intended to:

“provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. Planning permission for premises for childcare had been identified as an area of concern for childcare service development. These Guidelines are intended to ensure a consistency of approach throughout the country to the treatment of applications for planning permission for childcare facilities.”

They outline appropriate locations for childcare facilities including:

- New communities / Larger new housing developments
- The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working.
- In the vicinity of schools.
- Neighbourhood, District and Town Centres.
- Adjacent to public transport corridors, park-and-ride facilities, pedestrian routes and dedicated cycle ways.

The Jacob's Island scheme is consistent with all of the locational factors as outlined in the guidelines for new childcare facilities.

The proposed scheme will result in significant growth to an already large established population in the Jacobs island area.

There are a number of schools in the Mahon vicinity serving local need.

The area is in close proximity to the Mahon District Centre.

The site is adjacent to the Mahon walkway / cycleway as well as cycle links to the nearby Mahon Industrial Estate and beyond to the City centre (see enclosed connectivity map prepared by HW Planning).

Regional Policy

Southern Regional Assembly: Regional Spatial and Economic Strategy

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

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

To promote the Southern Region as an attractive, competitive and sustainable place to live, work and visit, a region of considerable opportunity for growth based on the quality of its cities, towns and rural areas, well developed physical and social infrastructure, a diverse modern economy and a pristine natural environment.

While some of the key specific aims include:

- Population increase of between 350,000 and 375,000 people between now and the year 2040
- Creation of 220,000 new jobs to support the above level of population increase
- Population and jobs growth to be aligned to occur within the same functional area to minimise unsustainable commuting patterns
- Cork City and suburbs population increasing by 115,000 additional people (an increase of more than 55%) from a population of 209,000 in 2016 to 324,000 by the year 2040

The ambitious population growth outlined in the NPF and the RSES will be difficult to achieve without residential schemes of scale at appropriate urban locations such as the proposed development at Jacob’s Island. The Jacobs Island and Mahon area have experienced significant population growth over recent decades (see enclosed population growth map prepared by HW Planning based on Census data). This contrasts with the City as a whole which, up until Census 2016, was experiencing population decline. Mahon has therefore established itself as a preferred location for new population and employment and will continue to do so based on National and Regional policy objectives.

The Jacob’s Island scheme also aligns with the key aim, as outlined above, of aligning population and jobs growth within the same functional areas to minimise unsustainable commuting patterns. We refer to connectivity map prepared by HW Planning which demonstrates the strong sustainable connections between Jacobs Island and local centres of employment, as well as Cork City Centre.

In relation to local centres of employment, we note the findings of the Cork City Employment and Land Use Survey (ELUS) 2016 which states the following about the South East sector.

The South East sector experienced the greatest job growth (3,609) of all six geographic sectors between 2011 and 2016. As indicated by Figure 3.3, the majority of employment in this sector is found in the Business and Technology zones in Mahon.

The survey indicates the greatest increase for the South East sector (1,100 jobs) occurred in the Information and Communication. This included 14 no. new businesses, five of which are large employers (Aruba Networks, wireless LAN solutions; Dell/EMC, data storage; Fire Eye, cyber security and malware protection; and Simplivity, data centre). Administrative and Support Service activities sector also added over 1,000 jobs in the South East, including newcomer Qualcomm (IT services and solutions provider which started in Dublin in 1995) and very significant growth at VoxPro (an indigenous customer service and technical support solutions firm, headquartered in Cork.) Finally, the Human Health and Support Service Activities sector also gained almost 1,000 jobs, primarily due to increases at St. Finbarr's hospital and to the relocation of the Mater Private Hospital from Shanakiel to the City Gate in Mahon.

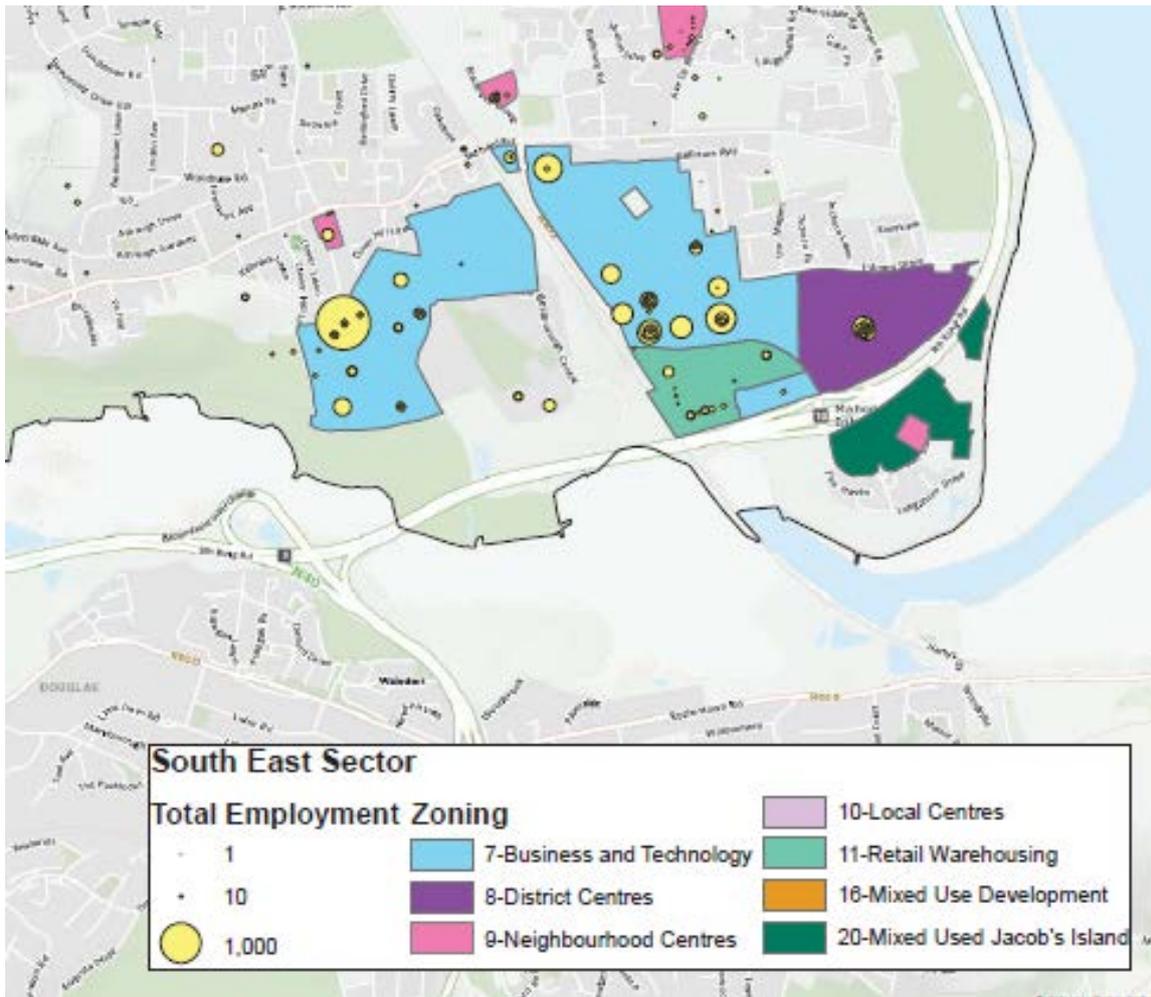


Figure 3 - Employment Map from ELUS

As outlined in the results of the survey, the Mahon area has experienced the strongest jobs growth in this sector of the City in recent years (see excerpt from the ELUS below). Targeting equivalent population growth in the same functional area is therefore consistent with the aims of the SWRPG and with principles of sustainable development.

The South West Regional Planning Guidelines 2010 – 2022 (SWRPG)

The vision statement for the south west region as outlined in the SWRPG is as follows:

“By 2022, the South West Region will be realising its economic potential and providing a high quality of life for its people by meeting their employment and housing, educational and social needs in sustainable communities. At the same time, it will reduce its impact on climate change and the environment, including savings in energy and water use and by strengthening the environmental quality of the Region.”

In terms of population the guidelines highlight Cork City as the priority location in the region for growth and list the suburban areas of Ballyvolane and Mahon as being suitable to accommodate this growth.

We consider the Jacob’s Island scheme to be consistent with the overall vision statement and growth targets as highlighted in the SWRPG.

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

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

- Move towards a more sustainable form of development for the Cork Area
- Improving access and accessibility
- Promoting integrated land use /public transport strategy
- Match the location of new housing as closely as possible with the location of employment growth centres
- Requiring an overall rise in housing densities and development that is concentrated rather than dispersed

The CASP envisaged a high quality bus corridor linking Ballincollig to Mahon via the City Centre.

The 2008 CASP update recognised that contrary to the original aims of the strategy, the population of the City had declined and there had been rapid expansion of population in rural areas and Ring Towns. It therefore gave priority to locations close the city for population growth. It also proposed an intensification of development in Mahon which was to serve as a strategic employment location.

The proposed scheme is consistent with the aims of CASP and the revised aims of the CASP update in that it will:

- create a higher density of development in this part of South Mahon with the addition of 413 residential units at a gross density of 123 units /ha and a net density of 137 units/ha.

- serve to improve the viability of future public transport investment in the area by creating a critical mass to support higher frequency services
- The development will also contribute to the longer term aim of introducing a Bus Rapid Transit route to the area that connects to the City Centre and Ballincollig to the west.
- Mahon is a proven employment growth centre in recent years with a number of significant employers in the area as illustrated on the local employment map prepared by HW planning and enclosed with this submission. The proposed scheme therefore accords with the CASP aim of matching employment and residential locations.
- The proposed scheme aims to achieve a gross density of 123 units /ha and a net density of 137 units / ha hectare making it consistent with the CASP aim of concentrated residential development.

Local policy

Cork City Development Plan 2015 – 2021

The Core Strategy of Cork City Development Plan outlines a number of strategic goals, Goal 1 being to increase population and households and to create a compact Sustainable city in line with ambitious growth targets as set out in the SWRPG. Goal 4 seeks to promote sustainable modes of transport and integration of Land Use and Transportation. Goal 5 seeks to maintain and capitalise on Cork's Unique Form and Character and refers specifically to the opportunity to create new character areas in locations such as Docklands, Mahon and Blackpool and at the arrival points or gateways into the city. The Core strategy recognises South Mahon as a Key Development Area with

“potential for further development in the area through the development of remaining "greenfield" land and through the intensification of existing sites”

The Retail Hierarchy (table 4.1) of the Plan designates Jacob's Island as a Neighbourhood Centre. The policies in relation to Neighbourhood Centres are outlined in Objective 4.6.

Objective 4.6 Neighbourhood Centres

- To support, promote and protect Neighbourhood Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities;
- To support and facilitate the designation of new and the expansion of existing Neighbourhood Centres where significant additional population growth is planned or where a demonstrable gap in existing provision is identified, subject to the protection of residential amenities of the surrounding area and that they are adequately served by sustainable transport;
- Proposals should demonstrate the appropriateness of the site by means of a Sequential Test Statement; demonstrate retail impact and provide for a mix of uses appropriate to the scale of the centre.

The proposed development will result in a significant increase in the population of Jacob's Island which currently has no retail offering. Given the large retail offering nearby in Mahon, the scale of the proposal has been chosen in order to cater for local need only.

There have been three attempts to obtain permission for the development of a neighbourhood centre on Jacob's Island and all three applications were refused on similar grounds and due to excessive commercial floor area, the presence of a medium scale supermarket/discount retailer and the consequent impact on traffic. The original application for a neighbourhood centre on the site TP 07/32647 & PL 28.228153 refers, contained almost 9,000 m² of commercial floorspace and included a 1,760 m² retail unit and 956 m² of ancillary retail services. This was reduced to approximately 2,250 m² in the subsequent TP 08/33256 & PL 28.232675 application and a similar figure of 2,269 m² was proposed in the most recent TP 13/35575 & PL 28.242701/PL 28.244860 application.

The most recent TP 13/35575 & PL 28.242701/PL 28.244860 application consisted of a discount retail store including off license with a net retail area of 1,125 m², 2 no retail/retail service units of 151 m² and 3 no. 1st floor office units (94 m², 89m² and 92 m²). Notwithstanding the zoning objective for the neighbourhood centre site and the City Development Plan policy that a medium scale retail unit is an appropriate anchor, this application has full regard to the previous decision of the Board and in particular the opinion that the development would result in the creation of 'a retail destination in its own right, beyond the retail needs of the local population'. In order to address this concern, the proposed neighbourhood centre contains 3 retail units with a gross retail area of 861 m² and a creche of 392 m². At this scale the retail component will not be a destination, will serve the retail needs of the local population only and will not result in trip generation that would have an adverse effect on traffic congestion. This is demonstrated in the Traffic and Transportation assessment which accompanies the application.

Among the Strategic Transport objectives contained within Objective 5.1 of the Development Plan include:

Objective 5.1 Strategic Transport Objectives

Provide for the greater consolidation of development within the City Centre, Docklands, Key Development Areas and Strategic Corridors, facilitated through the integration of land use and transport planning, investment and service provision;

To reduce the percentage of persons who drive to work to 60% by 2021;

To encourage and facilitate cycling and walking for short/local trips by providing appropriate infrastructure, promoting "soft-measures" that influence change in transport behaviour, and by encouraging proximate, compact land uses;

To develop a Bus Rapid Transit system from Ballincollig to Mahon via the City Centre and Docklands;

To protect the capacity, efficiency, and safety of national roads and associated junctions while maintaining and enhancing the economic vibrancy of Cork City;

To provide new local roads, streets, upgraded streets, and pathways where required to increase connectivity;

The proposed scheme through its density and scale aims to provide efficiencies in terms of land use and to ensure the viability of current and future public transport infrastructure, including the

planned BRT link. The provision of parking below maximum levels is aimed at reducing car ownership within the scheme while preventing significant impacts on the nearby junction with the N40 South Ring Road. Full details of this are outlined in the accompanying Traffic Impact Assessment prepared by Arup.

As outlined above Jacob's Island is currently a sustainable residential location by virtue of its walking, cycling and public transport linkages to the adjacent Mahon District Centre, City Centre and beyond. This has been demonstrated in Census 2016 statistics, which highlights that over 30% of Jacob's Island residents travel to work by sustainable modes including walking, cycling or public transport.

The proposed development will see high density residential development at a sustainable location and further encourage this sustainable modal share among future residents in an areas which is further advanced than most in to the City to meet the City Council's objective to reduce the percentage of people who drive to work to 60% by 2021.

Objective 5.2 Transport Assessment

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

The accompanying Traffic and Transport Assessment demonstrates consistency with the above objective. The Assessment outlines the travel patterns for residents of the existing residential schemes in this area and how they compare favourably with other small areas in Mahon. It also outlines the various measures aimed at reducing car dependency and promoting more sustainable modes.

Objective 7.2 Sustainable Neighbourhoods

To support the creation of sustainable neighbourhoods which allow access to services and facilities for all users and to foster a sense of community and a sense of place.

The existing community at Jacob's Island already enjoy many locational advantages including close proximity to the Mahon District Centre and the many large employers in the area, the proximity to the waterfront of Lough Mahon and the existing cycle and walkway infrastructure that is within easy reach and the availability of frequent bus services to the City Centre and beyond. The proposal is consistent with objective 7.2 in that it will further consolidate development at this location and ensure the viability of current and future improvements to public transport. The proposal will also, in conjunction with increasing population, introduce small scale local services including retail and childcare to create more activity in the immediate area and contribute to the sense of place at Jacob's Island.

Objective 14.1 Mahon Local Area Plan

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

- a. Expanding the population and improving residential amenity;

- b. Gradually replacing low density industry with higher density employment accessible to those living in the area;
- c. Creating strong focal places at Mahon Point and Neighbourhood Centres providing local services and a physical focus for their areas;
- d. Supporting a shift to non-car modes for transport, environmental, social and health reasons; and
- e. Conserving landscape, built heritage and environmental assets.

We consider the proposed development to be consistent with the Cork City Development Plan aim of realising the LAP vision for Mahon as it will contribute to population growth in close proximity to the ever expanding employment centres in Mahon, it will create a much needed focal point and neighbourhood centre of appropriate scale in Jacob's Island where local services are currently lacking and it will promote sustainable modes of transport.

The subject lands are covered by 2 main land use zoning objectives as follows:

ZO 9 Neighbourhood Centres

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

The primary purpose of these centres is to fulfil a local shopping function, providing a mix of convenience shopping, lower order comparison shopping, and local services to residential and employment areas. Some of these centres need to be enhanced significantly in terms of their retail offering, mix of uses, public realm, and overall viability and vitality. Limited retail offices will be acceptable in these centres to serve local needs and are subject to guidance on size and extent (paragraph 3.28) including a limit of 100sq.m. per unit. Residential uses are also acceptable within this zone. Where neighbourhood centres are located in areas of historic significance, for example, former villages now within the suburbs of the city such as Blackpool, policies to protect and enhance their architectural character will be applied.

See above response in relation to Objective 4.6 of the City Development Plan.

ZO 20 Mixed Use Zoning Jacob's Island

OBJECTIVE: To provide for mixed use development to accommodate up to 15,000 sq. m. business and technology offices and residential uses.

The proposed residential use at this location is consistent with the mixed use objectives for the lands. The Business and Technology uses targeted in the objective may be developed at a later stage on the remaining mixed use lands in the Jacob's Island area. The proposal to deliver residential only on these lands at the current time has been put forward having regard to the recent planning history on the site. In light of concerns regarding potential from traffic congestion at this location, as outlined in previous refusal reasons (Ref: PL 28.244860), the development of residential is considered the most consistent response to both the zoning objective and the various planning considerations for the site.

Objective 16.2 Visual Impact Assessments

All significant planning applications shall submit an accompanying visual impact assessment.

Objective 16.3 Urban Design

- To deliver high quality built environments through good place making;
- To ensure that development is designed to high qualitative standard and is cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking and detailed design

A comprehensive Visual Impact analysis has been carried out by AECOM as part of the proposed scheme and accompanies this SHD application. The Analysis has been carried out from a total of 10 no. strategically significant viewpoints chosen based on the text of objective 16.8 below, as well as consultation with the area planner in Cork City Council. The resultant Visual Impact analysis demonstrates that the proposed development is consistent with the principles of good urban design and will not result in undue visual impact in this area.

Objective 16.8 Tall Building in South Mahon

A tall building to mark the gateway into the city from the Harbour, the Jack Lynch tunnel exit and the Dublin Road (N8) should be provided in the location identified in Volume 2 / Map 8. This apex tall building must be located to be the focus for the following strategically significant views:

- From Lough Mahon / Cork Harbour as a signpost when viewed from the river;
- From the N8 Dublin Road / Glanmire Road;
- When emerging from the Jack Lynch tunnel on the N25.

The tall building should be located at the apex of the Jacob's Island lands at its eastern side. The tall building should be:

- Of high design quality and designed to be seen from the Harbour, the Dunkettle roundabout, the Dublin Road and the Southern Ring Road (westbound from the Tunnel);
- A maximum of 64m high/approx. 67.5m OD (or equivalent of approximately 16-20 storeys);
- Either a slender point building with a slenderness ratio of at least 3:1, a sail-like building or an apex building in design;
- In residential use, with the possibility of ground floor commercial use at ground floor to provide for the needs of residents and users of the Mahon walkway;
- The tall building should be approximately twice the height of its adjacent building;
- Particular consideration should be given to daylight/sunlight /amenity impacts on adjacent blocks & public space;

- Proposals to re-orientate the buildings so that it addresses the site's context in a positive fashion (i.e. the apex of the river) will be considered on their merits providing they do not result in significant loss of area to the proposed park.

The proposed development includes a 25 storey building at the location identified on in the Cork City Development Plan Zoning Map 6 South Eastern Suburbs Objectives and as outlined in Objective 16.8. The proposed tall building will be of design quality that is befitting of its location at a primary gateway into the city. Full details of the design approach are outlined by O'Mahony Pike Architects in the accompanying Design Statement. The proposed tall building will exceed the maximum height limits as defined in objective 16.8 of the Cork City Development Plan. The Board will note that the tall building has been subject to a re-design since the pre-consultation phase involving an increase in height from 19 to 25 no. storeys. This has been implemented following the opinion received at the tri-partite meeting held with An Bord Pleanala and Cork City Council whereby it was agreed by all parties that achievement of the optimum architectural solution for this key strategic site should be the primary aim and that a degree of flexibility would be possible regarding the specifics of the planning objectives for the site. The proposed building will be for residential purposes and will be sited and designed to ensure the amenity of adjacent and nearby existing apartment blocks.

Objective 16.9 Sustainable Residential Development

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

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

In terms of parking provision, the City Development sets maximum standards as follows:

- 1.25 spaces per unit for 1-2 bedroom units
- 2.25 spaces per unit for 3+ bedroom units
- 5% disabled

- 0.5 bicycle parking spaces per unit

The proposal aims to provide less parking than would be allowable by the maximum standards as set out in the Development Plan. This is consistent with previously discussed Cork City Development Plan objectives to encourage sustainable modes of transport and limit car usage. In addition, the applicant aims to provide electric charge points and a number of spaces for shared vehicles to be provided by GoCar Car Sharing Ltd. The Board will note the Letter from Go-Car enclosed with the statement on residential amenities confirming that the company would be willing to provide 2-4 shared car club vehicles within the proposed development.

Chapter 16 of the development plan outlines the various development management standards that will be adhered to when assessing a planning application. The table below lists all of these standards and assesses the proposed scheme against them.

Policy / Objective	Compliance of Proposed Scheme
<p>Objective 16. 1 Design Statement</p> <p>All significant planning applications shall submit an accompanying design statement which provides a framework explaining how a proposed development is a suitable response to the site and its setting.</p>	<p>Consistent</p> <p>The proposal has been accompanied by a detailed planning and design statement which includes a thorough examination of the site context and the associated design response.</p>
<p>Any development which will directly access or indirectly cause some impact on the national road network must submit a TTA with their application.</p>	<p>Consistent</p> <p>The proposal is accompanied by a full Traffic and Transport Assessment</p>
<p>Objective 16.2 Visual Impact Assessments</p> <p>All significant planning applications shall submit an accompanying visual impact assessment.</p>	<p>Consistent</p> <p>A landscape and visual impact analysis report accompanies the application and includes a comprehensive series of CGI's from various surrounding viewpoints as agreed with Cork City Council</p>
<p>Larger developments, e.g. over 1,000 sq. m. net floor area in suburban areas, shall be required to submit a retail impact assessment.</p>	<p>Not Applicable</p> <p>The proposed retail element of the scheme, at 861 sq. m, is below this threshold.</p>
<p>Objective 16.3 Urban Design</p> <p>- To deliver high quality built environments through good place making;</p>	<p>Consistent</p> <p>The proposed development is consistent with the strategic aims of the NPF as it will result in a high-density development on an infill site in a suburban area which is supported by public realm and urban amenity. Jacob's Island has</p>

<p>- To ensure that development is designed to high qualitative standard and is cognisant of the need for</p> <p>proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout,</p> <p>public realm, adaptability, privacy and amenity, parking and detailed design.</p>	<p>existing strong walking, cycling and public transport linkages to the adjacent Mahon District Centre, City Centre and beyond</p>
<p>Plot ratio – Indicative standard for Suburban Key Development Areas = 1.0 – 1.75</p>	<p style="text-align: center;">Consistent</p> <p>Proposal will achieve a ratio of 1.27</p>
<p>Open Space provision – Greenfield Sites covered by a LAP – 15%</p>	<p style="text-align: center;">Consistent</p> <p>Proposal will aim to achieve approximately 0.9 ha or 37% of communal open space provision which is well above the minimum standard.</p>
<p>Objective 16.7 Tall Building Locations</p> <p>The City Council will aim to protect the special character of Cork City which have been identified as having potential for tall buildings. These are South Docklands & South Mahon. (Locations are indicated on Zoning and Objectives Maps in Volume 2)</p>	<p style="text-align: center;">Consistent</p> <p>The proposed scheme provides for a tall building at the location specified in the City Development Plan mapped objectives.</p>
<p>Objective 16.8 Tall Building in South Mahon</p> <p>A tall building to mark the gateway into the city from the Harbour, the Jack Lynch tunnel exit and the Dublin Road (N8) should be provided in the location identified in Volume 2 / Map 8.</p> <p>This apex tall building must be located to be the focus for the following strategically significant views:</p> <ul style="list-style-type: none"> - From Lough Mahon / Cork Harbour as a signpost when viewed from the river; - From the N8 Dublin Road / Glanmire Road; 	<p style="text-align: center;">Consistent</p> <p>The proposed tall building on the site has been designed to accord with the key principles of objective 16.8. The design will enable it to serve as a fitting gateway into the City and will be visible from the harbour, Dunkettle, the M8 and the N40.</p> <p>A height of 25 storeys, while somewhat greater than the limits specified in the objective will ensure that the best possible architectural result will be achieved on the site. This approach has been agreed with An Bord Pleanála and the City Council during pre-consultation discussions.</p>

<p>- When emerging from the Jack Lynch tunnel on the N25.</p> <p>The tall building should be located at the apex of the Jacob's Island lands at its eastern side. The tall building should be:</p> <ul style="list-style-type: none"> - Of high design quality and designed to be seen from the Harbour, the Dunkettle roundabout, the Dublin Road and the Southern Ring Road (westbound from the Tunnel); - A maximum of 64m high/approx. 67.5m OD (or equivalent of approximately 16-20 storeys); - Either a slender point building with a slenderness ratio of at least 3:1, a sail-like building or an apex building in design; - In residential use, with the possibility of ground floor commercial use at ground floor to provide for the needs of residents and users of the Mahon walkway; - The tall building should be approximately twice the height of its adjacent building; - Particular consideration should be given to daylight/sunlight /amenity impacts on adjacent blocks & public space; - Proposals to re-orientate the buildings so that it addresses the site's context in a positive fashion <p>(i.e. the apex of the river) will be considered on their merits providing they do not result in significant loss of area to the proposed park.</p>	
<p>Objective 16.9 Sustainable Residential Development</p> <p>Residential developments shall be sustainable and create high quality places and spaces which:</p> <p>a. Deliver a quality of life which residents and visitors are entitled to expect in terms of amenity, safety and convenience;</p>	<p style="text-align: center;">Consistent</p> <p>The proposed development accords with the specifics of objective 16.9 as it aims to deliver.</p> <ul style="list-style-type: none"> - A high quality residential development with - 37% of the site will be dedicated to communal and private open spaces

<p>b. Provide adequate open space which are practical in terms of scale and layout and naturally supervised by the aspect of the dwellings it serves;</p> <p>c. Provide a good range of suitable facilities;</p> <p>d. Prioritise walking, cycling and public transport and minimise the need to use cars</p> <p>e. Present an attractive appearance with a distinct sense of place;</p> <p>f. Are easy to access and navigate;</p> <p>g. Promote the efficient use of land in terms of density and plot ratio;</p> <p>h. Promote social integration and provides accommodation for a diverse range of household types and age groups;</p> <p>i. Enhance and protect the built and natural heritage</p>	<ul style="list-style-type: none"> - The development will introduce local retail and childcare to Jacobs Island which currently lacks such services. - The site location will encourage the use of the excellent existing walking, cycling and public transport infrastructure in the area - The proposal will be developed according to a high-quality standard of architectural design and will feature a focal point tall building which will serve as a gateway to the City and a landmark in the wider area. - Accessibility and connectivity to the proposed development will be a key asset as outlined in the accompanying connectivity map - The proposed net density of 137 units per hectare and plot ratio of 1.21 are appropriate to the site and the valuable, well connected location that is Jacobs Island. - The proposed housing mix is consistent with the latest guidelines and will provide for identified housing need in this area - The scheme is accompanied by a full landscape design report which outlines the approach to unify and connect the development with the site's unique location adjacent to the existing linear park and walkway fronting onto Lough Mahon
<p>Dwelling mix</p> <p>One bedroom – max. 20%.</p> <p>Two bedroom – min. 30%.</p> <p>Two bedroom – min 50%.</p>	<p style="text-align: center;">Not applicable</p> <p>The mix ranges specified in the 2018 Apartment Guidelines take precedence over the Development Plan (see section on 2018 Guidelines above)</p>

<p>Min Floor Areas –</p> <p>One bedroom 55 sq. m.</p> <p>Two bedroom / 3 persons 80 sq. m.</p> <p>Two bedroom / 4 persons 90 sq. m.</p> <p>Three bedroom 100 sq. m.</p> <p>Four bedroom 115 sq. m.</p>	<p style="text-align: center;">Not applicable</p> <p>The minimum dwelling sizes specified in the 2018 Apartment Guidelines take precedence over the Development Plan (see section on 2018 Guidelines above)</p>
<p>Car Parking – Zone 3</p> <p>Residential– 1 per unit + 0.25 Visitor (Maximum Provision)</p> <p>Retail – 1 per 20 sq. m</p> <p>Childcare – 1 per 6 students</p>	<p style="text-align: center;">Consistent</p> <p>Were the proposed development to seek to achieve the maximum allowable parking provision in accordance with development plan standards, total parking onsite would amount to approximately 571 spaces (Residential – 516, Retail 43 & Creche approx. 12). The proposed provision of 409 car parking spaces is well within this maximum value and will serve to encourage more sustainable means of transport in the area.</p>
<p>5% of car parking spaces provided should be set aside for disabled car parking.</p>	<p style="text-align: center;">Consistent</p> <p>The scheme provides for 22 no. car parking spaces which represents just over 5% of the total parking provision</p>
<p>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.</p>	<p style="text-align: center;">Consistent</p> <p>The Proposed development will provide for 43 no. motorcycle parking bays</p>
<p>Electric Vehicle Parking</p> <p>There is a national target for 10% of all road vehicles to be powered by electricity by 2020 (Chapter 5). To meet this objective:</p> <ul style="list-style-type: none"> • Developments providing five or more parking spaces shall incorporate ducting in at least one parking space to allow for future fit out of a charging point; 	<p style="text-align: center;">Consistent</p> <p>A dedicated EV charging point will be provided as part of the proposal. In addition, ducting will be provided in 42 no. spaces to allow for future upgrading.</p>

<ul style="list-style-type: none"> • Development providing 10 or more parking spaces shall provide 1) at least one parking space equipped with a functioning EV charging point and 2) at least 10% of spaces shall incorporate ducting to allow for future fit out of a charging point; • The EV infrastructure specified above shall be in accordance with Cork City Council's Detailed Standards for EV Charging Infrastructure. 	
<p>Cycle parking</p> <p>0.5 per unit in Suburbs</p> <p>Retail – 1 per 100 sq.m</p> <p>Creche – 1 per 25 children</p>	<p style="text-align: center;">Not Applicable</p> <p>The 2018 apartment guidelines set ambitious targets for bicycle parking provision. The proposed scheme provides for 976 no. bicycle parking spaces across the scheme which is largely in line with the new guidelines and is well in excess of the minimum requirements in the Cork City Development Plan which would require approximately 202 spaces across the entire scheme.</p>

Mahon Local Area Plan 2014

Among the Key aims outlined in the Mahon Local Area Plan introduction as relevant to the proposed development are as follows:

- To encourage a diverse and appropriate range of uses to meet the needs of Mahon as a place to live, work and visit;
- To promote a high standard of urban design with a clear sense of place and architectural quality, and to improve the structure and character of Mahon's urban form through appropriate land use zoning and guidance on typology, density, and built form and by promoting excellence in the design of buildings and spaces;
- To ensure a range of high quality new homes to promote choice and achieve a social mix;
- To maximise the contribution of sustainable travel modes in meeting travel demand, including improved public transport services, demand management measures, and ensuring the provision of a comprehensive local and strategic walking and cycling network;
- To conserve and enhance Mahon's natural heritage and built heritage assets, including Bessboro House and parkland and the Natura 2000 habitats at Douglas Estuary and Lough Mahon;

The proposed development is consistent with the above listed aims as it seeks to consolidate the residential development of Jacob's Island with a high quality design strategy while also providing

for additional local services to increase the vibrancy of the area and meet the needs of existing and future residents.

The delivery of growth in Mahon has been separated into two Tranches in the LAP. The plan envisages the first tranche to be delivered in advance of the development of the proposed rapid transit and the second to be delivered after this delivery. Tranche 1 envisages a population increase of 4000 or 1,650 units. 410 of these units are targeted for Jacob's Island

Objective 16.9 Sustainable Residential Development

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

- a. Deliver a quality of life which residents and visitors are entitled to expect in terms of amenity, safety and convenience;
- b. Provide adequate open space which are practical in terms of scale and layout and naturally supervised by the aspect of the dwellings it serves;

In relation to the local landscape character, the LAP aims to:

Conserve and enhance landscape assets, including those Landscape Preservation Zones and Areas of High Landscape Value set out in the Cork City Development Plan 2009-2015, and use them to create a strong sense of place and contribute to amenities in the area.

Conservation Objective: To maintain or restore the favourable conservation condition of the bird species. Developments required to demonstrate no significant effects on habitat and protected species. Protection of significant trees / tree groups and ecological design of private and public open spaces.

The lands on the eastern boundary of the site which include the Mahon walkway amenity, are designated as an area of High Landscape Value within the Cork City Development Plan. Proposals for landscaping and shared open space around the proposed development will ensure consistency with the character of this exiting landscape and will aim to enhance and improve the exiting open spaces for the benefit of the local population.

The LAP describes the strategic location of Mahon and its suitability for sustainable development as the "Mahon Opportunity" and outlines the advantages of the area as follows:

- The development lands are strategically located to benefit from proximity to the City Centre and Docklands and the proposed public transport system upgrade, including rapid transit that will also provide high frequency access to UCC, CUH, CIT and Ballincollig;
- Mahon has a strong existing residential community and has benefited from RAPID status for the duration of the programme;
- Mahon offers a very attractive environment for residential development with a high landscape value, views, amenities, walkways and services;
- Mahon offers a cluster of employment uses and opportunities of benefit to those who will live in the area and served by local and retail services;

- Mahon is well served by shopping and local services at Mahon Point, Avenue De Rennes and other neighbourhood centres.

In addition, the LAP outlines the residential development concept for Mahon which includes various aims including to:

- Consolidate established residential areas and improve their amenity;
- Allow for high quality intensification of residential sites within existing residential areas.

Among the specific objectives outlined in the LAP are:

Objective P01: High quality development

Improve the quality of life of people through the provision of high quality residential, employment and other development.

Objective P02: Recreational and Green Infrastructure

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

Objective P03: Community, Civic and other Infrastructure

To ensure that Mahon is served by high quality community, civic, and other infrastructure and local services to meet the needs of the area and to provide for social cohesion and sustainable patterns of development in urban villages / neighbourhoods. This will include a new Mahon Library, youth centre and childcare facilities.

The proposal is consistent with all of the above objectives as it seeks to provide a high quality residential development with strong connectivity to existing recreational and green infrastructure and including local services and childcare provision.

The proposed transport system for Mahon is based on the following transport aims and objectives:

- Provision of residential development proximate to employment opportunities in Mahon and to the public transit system (City-wide stats from the Census 2011 show that 65% of those living and working in the city commute by non-car modes);
- To achieve a shift towards the achievement of national transport targets for modal split and to prioritise non-car modes as a transport solution for Mahon;
- To optimize the number of short trips for walking and cycling and public transport trips to encourage individuals to use a feasible alternative to the car for a range of trip purposes, including work, education, leisure and shopping / local services;
- Support and encourage walking and cycling so that short trips by these modes are encouraged due to safe and attractive routes and improved connectivity within, and to, the Mahon area;

- Support the provision of improved public transport network with viable public transport services levels and infrastructure and the potential for rapid transit to be delivered to connect Mahon to Docklands, the City Centre, Bishopstown and Ballincollig;
- Reduce the impact of development within Mahon on the N40 and to reduce the peak hour tidal flow of traffic;

Objective TO1: Smarter Travel Targets

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

Objective T04: Walking and Cycling

Improve pedestrian and cycle access, permeability, safety and priority throughout Mahon to encourage shorter trips by non-car modes and the creation of attractive streets

We consider that the advancement of the proposed scheme at Jacobs Island will align and be consistent with the transport objective for Mahon and indeed the wider metropolitan area. Jacob's Island is currently a sustainable residential location by virtue of its walking, cycling and public transport linkages to the adjacent Mahon District Centre, City Centre and beyond. This has been demonstrated in Census 2016 statistics, which highlights that over 30% of Jacob's Island residents travel to work by sustainable modes including walking, cycling or public transport.

The proposal will assist with delivering the necessary critical mass of population required to ensure the viability of future transport infrastructure.

Due to proximity to the N40 dual carriageway, potential impacts from noise will be a key consideration for the Jacob's Island scheme. WE note the following objectives from the LAP:

Objective N01:

Ensure that new development is not adversely affected by unacceptable levels of noise pollution.

Objective N02:

Seek to ameliorate the impact of unacceptable levels of noise pollution on existing areas.

The proposed development has regard to the potential noise impacts from the nearby N40 and makes provision for the following as mitigation measures

- Acoustic zoning of the site to use the site layout to create comfortable external areas and reduce the noise incident on sensitive facades;
- Use the building envelope design to attenuate noise entering the building and;
- Extending the existing barrier along the roadside to further improve the amenity of external spaces.

The Applicant is also cognisant of previous An Bord Pleanála decisions on neighbouring land which required a landscaped buffer of 10 metres from the edge of the road carriageway (Ref: 07/32686)

In terms of specific development objectives for the Jacobs island sub-precinct, as outlined below, we consider that the proposed development is fully consistent.

Residential development

Existing residential units 331

Gross floor area as a % of total 70% minimum

Residential yield [dwellings per hectare] - 35-90dph (medium – medium-high density)

Indicative new units - 250-635

Indicative additional population - 600-1,530

Non-residential development

Gross floor area (as a % of total) 30% maximum

Non-residential type New Neighbourhood Centre to include a convenience anchor and ancillary local services and up to 15,000gsm business and technology employment uses.

Neighbourhood Centre 1,200 gsm local centre committed (convenience and local services). New Neighbourhood centre to serve the needs of the catchment, including convenience anchor.

Community facilities Childcare facilities

The proposed net density of the scheme at 137 dph exceeds the LAP goals but is consistent with more recent national policy in this regard.

We note that when planning permission on adjacent lands (Ref: 07/32686 ABP Ref: PL 28.232275) is combined with the total number of units in the proposed development the potential housing yield in the Jacobs Island sub area would amount to 660 units. This is marginally above the indicative yield as outlined in the LAP but is justified based on the changed housing market since the publication of the LAP in 2014.

The indicative additional population as outlined in the LAP assumes on average more than 2 occupants per household which would have been influenced by the City Development Plan housing mix requirements. The proposed development is in accordance with the 2017 apartment guidelines on housing mix which recognise the reduction in average household sizes and supersede the City Development Plan requirement for a minimum number of 3-bedroom units. The proposed scheme as a result will consist of just over 23% studio or 1-bedroom units and just under 73% 2-bedroom units.

The proposed development provides for a retail development consisting of 3 separate units of 861 sq. m gross floor area in total which is well within the thresholds outlined for Neighbourhood centres. The scheme will aim to attract a small sized convenience retailer to serve local need as well as an ancillary retail offering. The Board will note that the proposed neighbourhood centre is distinct from the already committed retail provision in the area, as accounted for in the LAP. A 2007 application for a mixed use scheme (07/32686) includes provision for 5 small retail outlets of 138 sq. m, 234 sq. m,

93, sq. m, 117 sq. m & 235 sq. m respectively (Total 817 sq. m). This permission also included 2 medical centre units totalling 527 sq. m. The 1,200 gsm referred to in the Mahon LAP is an approximation of this committed retail provision.

The proposal aims to provide for a creche of 376 sq. m within the neighbourhood centre zoning to accommodate existing and future residents of this area.

Metropolitan Cork Joint Retail Strategy 2015

The strategy published jointly by Cork City and County Councils in 2015 identifies Jacobs island as a suitable location for a Neighbourhood centre in its retail hierarchy.

The strategy refers to Neighbourhood centres as providing important top up and day to day shopping and retail service requirements. They are typically characterised by an appropriately scaled convenience offer and ancillary retail services and serve a small localised catchment population.

Policy 6: Neighbourhood Centres and Large Village Centres: To support, promote and protect Neighbourhood Centres and Large Village Centres which play an important role in the local shopping role for residents and provide a range of Metropolitan Cork Joint Retail Strategy essential day to day services and facilities. The opportunity for development of new neighbourhood centres will be identified in Development Plans or Local Area Plans as appropriate including where significant additional population growth is planned or where gaps in existing provision are identified. Neighbourhood Centres generally serve smaller, more localised communities and provide an important service at a local level. Comparison retail floorspace will be limited to small scale local provision.

The proposed development of a neighbourhood centre at the proposed location is consistent with the identified retail hierarchy in the Cork Joint Retail Strategy.

By proposing 3 no. units that will be appropriate in size for local convenience retail only (590 sq. m, 150 sq. m and 138 sq. m respectively), the proposed development will cater to local need on Jacobs Island only in accordance with Policy 6 of the Joint Retail Strategy.

Further to policy 6, the need for a neighbourhood centre at this location has been identified in both the LAP and the City Development Plan.

Summary of Statement of Consistency with Key Planning Policy matters

<p>Strategic Policy Objectives</p>	<p>Population</p> <ul style="list-style-type: none"> • NPF Objective 8 – Growth target of 105,000 – 125,000 for Cork City and Suburbs by 2040 • SWRPG - Growth Target of 22,290 people between 2010 – 2022 for Cork City 	<p>As of Census 2016 the population of Cork City had grown by almost 6,500 since the previous census. This would indicate that the targets set in the SWRPG were not on course to being met.</p> <p>Assuming an average occupancy rate of 2.4 persons per household, we project that the proposed development will increase the population in the area by 991.</p>
	<p>Density</p> <ul style="list-style-type: none"> • NPF Objective 35 - Increase residential density in settlements. • Central and / or accessible locations – Higher densities appropriate 	<p>The proposed development will achieve a net residential density of approx. 137 units per hectare.</p>
	<p>Transport</p> <p>NPF Objective 64 – Integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car.</p>	<p>The proposed development will benefit from existing walking / cycling and public transport linkages in the area and will limit provision of parking to encourage future residents to avail of these sustainable modes.</p>
<p>Local Policy Objectives</p>	<p>City Development Plan</p> <ul style="list-style-type: none"> • Goal 1 – Increase population and households • Goal 4 – Promote sustainable modes of transport • Mahon Identified as a Key Development area • Objective 16.8 – Tall Building 	<p>The proposed development will contribute to the high level strategic goals of Cork City Development Plan through assisting population and household growth in the key development area of South Mahon. The Proposal also provides for a Tall Building. In accordance with objective 16.4 in the Plan.</p>
	<p>Mahon LAP</p> <p>Objective 14.1 – expansion of population</p>	<p>The proposed development will contribute to meeting the population and housing targets contained in the LAP</p>

	Tranche 1 development (pre-BRT) up to 2025 envisages 1,650 residential units	
Development Management Objectives	Density Min. 50 units / ha along bus routes	The proposed development achieves net density of 137 units / ha
	Height Medium Rise appropriate in major development areas.	All blocks with the exception of 3 are consistent with the description of medium rise in the development plan. Block 3 is consistent with the tall building objective for this location.
	Plot Ratio Standard for Key Suburban Development Areas – 1.0 – 1.75	The proposal will achieve a plot ratio of 1.23
	Housing Mix Development Plan housing mix has been superseded by the Apartment Guidelines – Up to 50% 1-bedroom units. No min requirement on 3-bedroom	The proposed development will include 25% studio and 1-bedroom apartments. The majority of units will be 2-bedroom with a small amount of 3-bedroom units
	Neighbourhood Centre Should not exceed 1,500 sq. m net.	The proposed neighbourhood centre will provide for 878 sq. m of retail space and will include small scale convenience offering.