

Response to Cork City Council LRD Opinion

For Development at the Former Ford Distribution Site, fronting onto Centre Park Road, Ballintemple, Cork

on behalf of Marina Quarter Ltd.

November 2024



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

This report addresses the specific information requirements and issues raised by Cork City Council (CCC) in their Pre-planning Large-scale Residential Development (LRD) Opinion issued on August 26th last, under CCC Ref. LRD 002-24 in relation to the proposed LRD at the Former Ford Distribution Site, fronting onto Centre Park Road, Ballintemple, Cork comprising 176 no. 1, 2 and 3 bed apartment units in 2 no. blocks, 1 no. creche, 1 no. gym, a retail/café space and all associated ancillary development works.

The opinion issued by the Council was after 1 no. Section 247 meeting which took place on April 23rd, 2024, and a Section 32B meeting which took place on August 7th, 2024.

Following the pre-planning meetings, the Council issued an Opinion in accordance with Section 32D of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that the documentation submitted requires further consideration and/or amendment to constitute a reasonable basis for an application.

The specific information requested by CCC and our response to same is outlined in sections 2 and 3 of this report.

2. Information to be submitted with the LRD Application

Pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), CCC also notified the prospective applicant that, in addition to the standard requirements as specified in articles 20A, 22 and 23, the specific information outlined below should be submitted with any application for permission. The specific information requested by CCC (***bold italics***) and our response to same, is as follows:

1a - The layout of Block A should be 'mirrored' to bring the Northern element of the block closer to Street C which will assist in creating an urban edge along this street, will improve enclosure, and more closely follow the rhythm of the blocks established in the approved adjacent SHD scheme. The Southern element of Block A should be moved further away (East) from Street C to ensure that the connection from Street C to the proposed Plaza area (to the South of the Development) is improved and creates a sense of destination. (Please note the contents of the City Architects Report in this regard, see Appendix C)

The design for Block A has been updated in line with the council's request. The block's layout has been mirrored, moving the northern section closer to Street C. This change enhances the urban edge along Street C and strengthens the sense of enclosure. It also increases the width of the podium, providing a brighter external space and improved internal lighting. Finally, the rhythm of the block better aligns with the block pattern established in the approved adjacent SHD scheme.

1b - The proposed vehicle entrance serving the undercroft car park should be relocated to Street C with the proposed disabled parking bay removed completely (all parking should be provided within the undercroft car park). The removal of this entrance, and associated roadspace, will provide an opportunity to create an enhanced public space within the development lands and remove potential conflicts along Centre Park Road. (Please note the contents of the Strategic Transport Planning, City Architects and Strategic Planning and Heritage Reports in this regard, see Appendix C)

The vehicle entrance for the undercroft car park has been relocated to Street C and the associated roadspace has been removed to create an enhanced public space within the development. However, the proposed disabled parking bay has been retained, as we believe its current position does not interfere with pedestrian connections and provides convenient access, supporting the needs of the residential scheme. Care has been taken to maintain pedestrian access along Street C and reduce conflict between pedestrian, cyclists and vehicles.

1c - The layout of the Plaza area/public open space areas to the South/South-East of the scheme should be revised to create a more useable, welcoming public open space area with particular consideration given to the levels of same. A revised landscape design approach is required to resolve the transition in levels from the built form to the Parkland in a more natural manner. The design of Marina Park is an open, passive Parkland with natural areas and minimal use of railings. The interface therefore needs to respect it's Parkland context and ensure it contributes to the exemplar design ambition being delivered by Cork City Council in Marina Park and sought under Objective 10.6 of the Plan for new developments in City Docks. (Please note the contents of the City Architects and Strategic Planning and Heritage Reports in this regard, see Appendix C)

The Plaza forms part of the adjacent SHD permission and efforts have been made to integrate neatly with this scheme, including careful landscaping and the location of the cafe unit adjacent to the Plaza for increased activity. A pedestrian link is also provided to the Podium from this part of the development.

The design of the Plaza Area has been amended and further developed and is described in detail in the Landscape Plans by Ait Landscape and Urbanism. The plaza is now directly addressed by the Retail / Café unit in the southwest corner of Block A. The Café will provide enhanced surveillance and animation of the Plaza. The Plaza within the development forms a seamless extension of the Public Open Space proposed as part of the Marina Quarter Development presently under construction.

As far as is feasible the public realm in the development meets with the levels of the existing grassland and wetland area adjoining the site and indicative path connections shown on DWG Ref. DR-0100 by Ait Landscape and Urbanism illustrate deliverable connections from the development to the Marina Park Phase 01. It should be noted that the existing levels with the existing grassland and wetland area undulate significantly along the boundary with the proposed development from 1.5 – 3.0metre OD. It is not feasible to bring the public realm levels within the development down to 1.5m OD whilst maintaining universal access around the perimeter of the development and integrating with the Marian Quarter development currently under construction.

2a - The inclusion of a childcare facility within the proposed development. This facility should be of a capacity appropriate for the proposed development and the childcare provision demand for this location, with consideration given to ensuring the viability of such a facility. The applicant is advised to discuss proposals with Cork City Childcare Committee prior to submitting any planning application. (Please note the contents of the Cork City Childcare Report in this regard, see Appendix D)

Please refer to the submitted drawings prepared by JFA Architects. The proposed design of the childcare facility was shared with the Cork City Childcare Committee who provided feedback which will be taken on board. A crèche with three classrooms, providing 35 places has been provided. The facility also includes toilets, staff areas, and a kitchen. According to the childcare guidelines, the required number of childcare spaces for this scheme is 30, while our proposed crèche exceeds this requirement. Additionally, there is an adjacent external play area of circa 102 square meters to the south, enhancing the facility's functionality. We believe this design meets the needs of the development, which consists of 82 two-bedroom apartments and 32 three-bedroom apartments.

A crèche demand report by McCutchen Halley has been carried out to determine the existing childcare facilities within 2km (10–25-minute travel time) of the proposed development site. The modes of travel were identified as feasible within the study area are walking, cycling and driving. Public transport is not considered given the short distances from the subject site to the various crèche locations and the configuration of bus routes in the area.

Based on the current Census data outlining the demographics of the catchment area and evidence of national trends regarding the uptake of childcare facilities the proposed development may generate demand for up to 16 no. additional childcare places, although in accordance with national research it is not probable that all 16 children will require childcare.

As outlined in this report, the proposed development includes 1 no. childcare facility which has a capacity of 35 no. childcare spaces. This exceeds the projected childcare needs of the proposed development.

2b - Consideration should be given to the location of the proposed retail/café unit and to the location of the proposed childcare facility (see point a. above). The application should give consideration to locating the café/retail unit to the South of Block A so as to open onto the open space/plaza area to create an active public use for this public open space which would relate to the proposed uses in the adjacent development in this location. Consideration should be given to the position of the childcare facility within Block B with the use of the South-Eastern public open space area as the external play area.

Please refer to the submitted drawings prepared by JFA Architects. A café/retail unit is now located to the south of Block A, facing the public plaza, to create an active and engaging use for the open space, complementing the adjacent development. The café will feature a double-height space on the south corner, which enhances the openness and appeal of the area, creating a welcoming atmosphere and encouraging greater interaction with the public space. Additionally, we have positioned the crèche at the north-east end of Block B, with the external play area

situated immediately to the south, ensuring convenient access and functionality.

2c - The applicant should give further consideration to revising the Basement Plan and Ground Floor Plan to ensure more active frontages along Centre Park Road and the Street C Elevation. Consideration should be given to the positioning of the Plant, Storage and Bicycle Parking areas to increase live, active frontages. (Please note the contents of the Strategic Planning and Heritage Report in this regard, see Appendix C)

Please refer to the submitted drawings prepared by JFA Architects. The frontage along Centre Park Road is animated with several active features, including the long gym façade, stepped access to the podium amenity space, the entrance and rhythmic windows of the bicycle parking, the entrance to Block B, and the glass wall of the crèche. Together, these elements create a dynamic and engaging streetscape. Additionally, the proposed landscaping further enhances the vitality of this path, contributing to a more active and lively frontage along Centre Park Road.

Along Street C, the façade has been activated with several key features to enhance its liveliness. These include the café on the south corner, access to the bicycle store, the main entrance to Block A, and podium access. Additionally, the vehicle and pedestrian entrances to the car park and the gym's curtain walled façade, which includes both the gym and class studio, further contribute to creating a dynamic and engaging frontage. These design elements, combined with those along Centre Park Road, ensure active and vibrant frontages on both sides of the development.

Please refer to contextual and detailed elevation drawings by JFA Architects included in the submission.

3.1 - The application drawings should provide further detail with regard to existing and proposed levels across the entire development site. The treatment of level differences within the proposed development and the relationship of the development with adjoining lands and public roads should be described in detail, in plan and in section drawings, including all public open space areas. Particular consideration should be given to the interface with Centre Park Road, the adjacent residential development site to the South-West (currently under construction), and the open space area to the East/South-East. (Please note the contents of the City Architects and Strategic Planning and Heritage Reports in this regard, see Appendix C)

Please refer to the drawings and reports prepared by JFA Architects, Ait Landscape and Urbanism and DBFL Consulting Engineers that accompany this planning application. The application drawings submitted provide further detail regarding existing and proposed levels across the entire development site.

Additional Landscape Sections have been provided to clearly illustrate the relationship of the proposed development with adjoining levels and public roads; including the Centre Park Road and the Marina Quarter. The sections and landscape plans clearly illustrate a well-considered integration of the development with its context as it exists and that under construction in the case of the Marina Quarter Development.

3.3 - A detailed schedule of accommodation demonstrating compliance with the relevant residential/housing standards.

A Schedule of Accommodation (named Area Schedule) and a Housing Quality Assessment by JFA Architects detailing how the proposed development adheres to the relevant residential and housing standards was prepared and accompanies this planning application.

3.4 - Detail of areas intended to be taken in charge by the local authority, including any surface water management features (SUDS) within such areas.

A taking charge plan (DWG Ref. FRD-P1004 -Proposed Site Layout Plan Taking in Charge by JFA Architects) was prepared and accompanies this planning application.

3.5 - The application should include a detailed rationale for the proposed residential density and housing mix having regard to the provisions of the City Development Plan and relevant national and regional planning policy including the 'Sustainable and Compact Settlements Guidelines for Planning Authorities, 2024', 'Urban Design Manual', The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2022) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).

The rationale for the proposed density and housing mix is set out within the Planning Report prepared by McCutcheon Halley which is based on the review of the relevant national and regional policies as well as the city development as presented in the Statement of Consistency prepared by McCutcheon Halley. Both these reports accompany this planning application.

3.6a - The inclusion of a direct pedestrian access from Street C to Block A is welcome, however the applicant is requested to further consider the issue of permeability and connectivity, particularly with regard to improvement of the public realm design interface to ensure a direct hard standing access is provided and the route is not blocked by street furniture.

Permeability within the site, to Centre Park Road and to the adjacent SHD have been considered and prioritized by creating a large, shared surface linking the proposed development with Street C of the adjacent development and the Centre Park Road. All direct pedestrian links onto the proposed cycle and pedestrian tracks are designed to ensure clear access without blockage from landscaping or street furniture.

Direct access is provided from Street C to Block A as illustrated on the Landscape Plans by Ait Landscape and Urbanism. There are multiple routes; none of which are obstructed by street furniture.

3.6b - The provision of direct pedestrian/ bike access to both bike parking areas from the public street network is welcome and removes the need for cyclists to travel through the undercroft car park if desired. In addition, the bike parking area serving Block B provides improved animation of the Centre Park Road. The applicant is requested to further consider that the doorways and corridors associated with bike access to the Block A bike parking area should be wide enough to ensure ease of access.

Please refer to the drawings by JFA Architects. The above design recommendation has been incorporated within the final design of the access to the bicycle parking associated with Block A.

3.6c - To avoid the provision of a further street entrance along Centre Park Road the applicant is requested to further consider relocating the proposed vehicular entrance serving the undercroft car park to Street C with the proposed disabled parking bay removed completely (all parking should be provided within the undercroft car park). The removal of this entrance and associated roadscape will provide an opportunity to create an enhanced public space within the development lands and remove potential conflicts along Centre Park Road.

The vehicular entrance has been amended to enter via street C of the adjoining SHD, thus removing the additional entrance off Centre Park Road, refer to DWG Ref. X-04-Z00-XXX-DR-DBFL-CE-1201 Roads Layout by DBFL Consulting Engineers. The proposed disabled parking bay has been retained, as we believe its current position does not interfere with pedestrian connections and provides convenient access, supporting the needs of the residential scheme.

3.7a - The applicant is requested to further consider the issue of place making, public space in terms of hard landscaping (a public space for activity), and the hierarchy of routes. In this regard the applicant is requested to consider a revision of the layout to the south of the

scheme where it is noted that semi-public 1st floor podium space is connected to the lower landscaped area through a series of ramps and steps, with the result that there is an extensive use of railings and guardings which is considered to diminish the effectiveness of the podium to act as a strong urban edge to the landscape and park beyond.

There are significant level changes between the edge of the scheme and the parkland beyond. The applicant is requested to consider locating public or civic uses to the base of the apartment block along this edge so as to activate the public plaza identified in the approved scheme. It is important that the floor level of that public use ties into to the level of the corresponding plaza."

The landscape design along the southern boundary has been revised to improve connectivity and reduce the visual impact of the previous extensive use of ramps. The long ramps that were part of the original design have been removed and replaced with a more immediate stair access. This change creates a more direct and efficient connection between the semi-public podium and the lower landscaped area, strengthening the podium's role as a defining urban edge that integrates more effectively with the adjacent parkland. For more detailed information, please refer to the updated landscape drawings and documents by Ait Landscape and Urbanism, which provide a comprehensive overview of these revisions.

In response to the feedback on level changes between the scheme and the parkland beyond, the levels have been carefully adjusted to ensure they align with the corresponding plaza to the south. This revision complements the inclusion of a café at the south end of Block A. The café is designed to activate this space, creating a focal point for public engagement and inviting people into the southern area of the scheme. The levels of the plaza have been deliberately tied into the floor level of the café, ensuring a seamless transition between the public plaza and the café/store. We believe these adjustments address the concerns raised and strengthen the overall public realm design by ensuring better integration between the built environment and surrounding landscape.

The landscape proposals have been further developed and amended. The transition from the podium gardens to public realm levels on the eastern is via a single mid-level accessible by steps only with ramps omitted. A retail / café unit has been located to overlook and animate the Plaza. There is a seamless integration of the Plaza and the Public Realm of the Maraina Quarter Development under construction; they will both on completion form a single unified public space.

3.7b - The applicant is requested to consider revising and reconfiguring where the scheme interacts with 'Street C', with consideration given to re-locating the northmost block closer to the street so as to improve

enclosure and more closely follow the rhythm of the blocks established in the approved adjacent SHD scheme. Full details, including sections and 3-D views of same should be included at planning application stage.

In response to the request for revisions where the scheme interacts with 'Street C,' the design for Block A has been updated in accordance with the council's guidance. The layout of the block has been mirrored, repositioning the northern section closer to Street C to improve enclosure and better align with the rhythm of the blocks established in the approved adjacent SHD scheme. Contiguous elevations and sections prepared by JFA Architects have been submitted to demonstrate the continuity with the SHD scheme, along with contextual 3D views by Modelworks that illustrate the integration of the revised design within the surrounding development.

3.7c - The applicant is requested to consider the form of developed street-level perspectives from all aspects, with a high degree of architectural detailing and finishing information to be included at planning application stage. More detailed elevations and street-level perspectives as described above will be required to determine how well this streetscape has been resolved.

Please refer to DWG Ref. FRD_00_ZZ_DR_JFA_AR_P4004 and FRD_00_ZZ_DR_JFA_AR_P4005 by JFA Architects which have been submitted with this application. A series of 3D images by Modelworks have been developed to provide a comprehensive view of the streetscape from multiple angles, demonstrating how the proposed design has been resolved in relation to its context.

3.8a - The applicant is requested to further consider a revised landscape design approach to resolve the transition in levels from the built form to the Parkland in a more natural manner. The design of Marina Park is an open, passive Parkland with natural areas and minimal use of railings. The interface therefore needs to respect its Parkland context and ensure it contributes to the exemplar design ambition being delivered by Cork City Council in Marina Park and sought under Objective 10.6 of the Plan for new developments in City Docks.

As far as is feasible the public realm in the development meets with the levels of the existing grassland and wetland area adjoining the site and indicative path connections shown on DWG. Ref. DR-0100 by Ait Landscape and Urbanism illustrate deliverable connections from the development to the Marina Park Phase 01. It should be noted that the existing levels with the existing grassland and wetland area undulate significantly along the boundary with the proposed development from 1.5 – 3.0metre OD. It is not feasible to bring the public realm levels within the development down to 1.5m OD whilst maintaining universal access around the perimeter of the

development and integrating with the Marina Quarter Development that is presently under construction.

3.8b - The applicant is requested to further consider the introduction of additional non-vulnerable active uses/ community uses along Centre Park Road and adjoining Street C to ensure passive surveillance and vitality within Centre Park Road and a new street connection to Marina Park.

A retail/café unit has been relocated to the southwest corner of Block A this will animate Street C and the Plaza.

A Gym and Creche are located on the Centre Park Road frontage. In addition, a stepped access to the Podium Garden from Centre Park Road and direct access to the bike store will provide additional footfall and animation along this edge.

3.9a - The applicant is requested to further consider the details of the raised table, cycle infrastructure and tie-in's to the existing ped/cyclist infrastructure and should ensure these are discussed with Cork City Councils Infrastructure Section prior to submitting an application.

The updated proposal by DBFL Consulting Engineers shows a proposed tie-in to the existing infrastructure and the proposed raised table as per the previously granted scheme (Ref. ABP-309059). These proposals have been discussed with Cork City Council Infrastructure Sector.

3.9b - The applicant is requested to submit confirmation of intervisibility of drivers egressing the car parking and a driver carrying out manoeuvres to any parking bays/set-downs adjacent to the vehicular access/egress.

The vehicles egressing the car parking can see further than halfway up the external disabled parking bay when approaching the exit to the undercroft parking area ensuring there is sufficient intervisibility between anyone exiting the parking area and a driving carrying out a manoeuvre in the disabled bay.

3.9c - The applicant is requested to submit confirmation of Management Company to be put in place and require a drawing indicating the exact area of maintenance the management company will be responsible for and if necessary a Taking in Charge drawing.

A taking charge plan (DWG Ref. FRD-P1004 -Proposed Site Layout Plan Taking in Charge) has been prepared by JFA Architects and accompanies this planning application.

3.10a - The applicant is to clarify if permitted developments in the area (adjoining Ford site, Gouldings site etc) are taken into account in the traffic assessment as this is not outlined in the TTA.

The permitted development in the vicinity of the subject site has been considered and included in the Traffic and Transportation Assessment report by DBFL Consulting Engineers. Section 5.3.1 of the TTA outlines a total of four separate 'Committed' development schemes near the subject site, ensuring that the impacts of these developments have been comprehensively accounted in the Traffic Assessment.

3.10b - The applicant is requested to ensure that an assessment of the impact of construction traffic on the local network should be carried out taking into account the timelines for other permitted developments in the area that may have similar construction phase timings.

The potential impact of construction traffic of proposed development on the local network has been assessed and demonstrated in Section 6.4 of the Traffic and Transportation Assessment report (TTA) prepared by DBFL Consulting Engineers. The construction traffic associated with the permitted developments in the vicinity has also been accounted as part of the construction impact assessment.

3.10c - The interaction of the permitted Street C entrance on the adjoining development and the proposed undercroft parking vehicular entrance in terms of how vehicles, pedestrians and cyclists interact is not shown. There is a concern in relation to introducing additional conflict points here from a road safety point of view. The preference would be for the side by side entrances to be combined to reduced confusion for road users and reduce conflict points. The applicant is requested that further consideration should be given to same.

The vehicular entrance has been amended to enter via street C of the adjoining SHD, thus removing the additional entrance off Centre Park Road, refer to DWG Ref. X-04-Z00-XXX-DR-DBFL-CE-1201 Roads Layout prepared by DBFL Consulting Engineers.

3.10d - The applicant is requested to further consider improving the access to the Block A cycle storage area, with particular consideration given to ensuring direct access from the Street C elevation is also provided.

Please refer to DWG Ref. FRD-P4002-Proposed Block A Elevations prepared by JFA Architects which shows a direct access point to the bicycle storage area associated to Block A.

3.10e - A mobility management plan should be submitted as part of the planning application documentation.

A Mobility Management Plan prepared by DBFL Consulting Engineers has been submitted with this application

3.10f - An outline CTMP should be submitted as part of the planning application documentation.

3.10g - Public lighting proposals should be agreed with the public lighting section of Cork City Council.

The lighting section from Cork City Council was consulted and the lighting proposal was agreed.

3.11a - A copy of the Statement of Design Acceptance from Uisce Éireann (following submittal of full and final designs to Uisce Éireann) and full design details and drawings to be included with the planning application.

A Statement of Design Acceptance has been included in Appendix E of the Infrastructure Design Report prepared by DBFL Consulting Engineers.

3.11b - The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals in respect of the proposed surface water management arrangements of the development, with particular focus on the following:

3.11b(1) - The Site Services Layout drawing shows the proposed storm water drainage system discharging to the adjacent site. This connection point is labelled as "Existing surface water manhole to be provided as part of the adjacent Fords Development". It is understood that this manhole has not been constructed and is not existing. The applicant is requested to consider how this manhole is to be constructed as it currently lies within the red line boundary of this application and not the adjacent SHD site. The applicant is requested to clarify the red line boundaries between the sites (evidence of agreement with the adjacent site for the proposed storm water connection would be required).

Due to the change in vehicle access to be via Street C, the red line boundary has extended to overlap with the SHD extents. The adjacent SHD is within the ownership of the applicant thus allowing the facilitation of the surface water drainage to the drainage network within the adjacent SHD development.

3.11b(2) - As shown on the Site Services Layout drawing, it is proposed to discharge 5l/s to the drainage system of the adjacent site. No details or calculations for this discharge rate are included in the Infrastructure Design Report. The impact of discharging at 5l/s to the drainage system of the adjacent site has not been addressed or assessed in the Infrastructure Design Report. The applicant is requested to provide full details of same and to revise and update the report.

Please refer to Section 5.4 of the Infrastructure Design Report prepared by DBFL Consulting Engineers.

3.11b(3) - No details or calculations have been provided for any SuDS or NBS feature other than the attenuation tank. Further consideration should be given to provide full designs and calculations for the drainage network, including each of the SuDS features, detailing their infiltration, storage or attenuation contribution to limiting site run-off (i.e. green roof / rain garden / bio-retention area / permeable paving).

Although the buildup within the SuDS elements will provide a level of storage there is no flow control provided on the SuDS elements and as such the storage volumes cannot be accurately determined especially in larger rainfall events. The SuDS elements are designed to temporarily store the everyday rainfall event but in larger rainfall events the runoff will overflow back into the main drainage network and be stored in proposed attenuation tank which has been designed for the 100-year storm event plus climate change as well as the tidal locked event. Therefore, the incorporation of the above SUDS elements will provide a sustainable way to slow down and disperse surface water from the site and provide treatment of run-off and subsequent improvement of discharge quality. Treatment volume and interception volume calculations have been provided for the proposed SuDS features, however, no storage is accounted for in the calculations. Please refer to Section 5.9 and 5.10 and Appendix D of the Infrastructure Design Report prepared by DBFL Consulting Engineers.

3.11b(4) - The applicant is requested to clarify if, and how, the proposed storm water drainage system takes account of tide locking during storm events.

It is proposed to discharge the subject site's surface water network into the adjacent development (Ref. ABP-309059). The surface water strategy of the adjacent development has both been designed to cater for the runoff area of the subject site and to account for a tidal lock event. Please refer to Section 5.4 of the Infrastructure Design Report prepared by DBFL Consulting Engineers .

3.11b(5) - It is noted that the proposed attenuation tank is a geo-cellular system (i.e. StormTech). The applicant is requested to clarify that the proposed system is suitable for use in areas of groundwater and the storage capacity of the tank will not be reduced due to groundwater.

The proposed tank type was selected to provide another level of filtration but will be lined to protect against ingress of groundwater and potential contamination via infiltration. Please refer to Section 5.4 of the Infrastructure Design Report prepared by DBFL Consulting Engineers.

3.11b(6) - The applicant is requested to clarify if it is intended for the development to be taken in charge, and, if so, details of the proposed areas to be taken in charge should be submitted. Please note that where a development is to be taken in charge, all attenuation tanks shall be concrete and permeable paving is not permitted.

It is not proposed to have the proposed development taken in charge.

3.11b(7) - The applicant is requested to note that the drainage strategy for the site must also consider and outline how the drainage network will be operated and maintained. In particular, how SuDS features will be accessed and maintained safely (i.e. attenuation tank with bio-retention area above).

Due to the change in vehicle access to be via Street C, the red line boundary has extended to overlap with the SHD extents. The adjacent SHD is within the ownership of the applicant thus allowing the facilitation of the surface water drainage to the drainage network within the adjacent SHD development.

3.11c - The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals in respect of the proposed flood risk management arrangements of the development, with particular focus on the following...

3.11c(1) - As per Section 11.266 of the City Development Plan, applications for vulnerable development in flood risk zones, including within Flood Zones A and B in the City Centre and the Dockland areas and in areas at risk under the OPW's Mid-Range Future Scenario, shall provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following:

- Floor Levels
- Internal Layout
- Flood-Resistant Construction
- Emergency Response Planning

The above items should be addressed and detailed in the Flood Risk Assessment

Please refer to the Site Specific Flood Risk Assessment prepared by DBFL Consulting Engineers for details of structural and non-structural risk management measures.

3.11c(2) - Section 10.120 of the City Development Plan highlights that maintaining the aquitard function provided by the existing alluvium soil layer has been identified as a key requirement of the proposed redevelopment of the South Docks. Further consideration is required to detail how no new flow paths will be created and that an equivalent aquitard function is maintained post-development. Also, the depth of the aquitard should be highlighted on the foul and surface water drainage long sections submitted as part of the Planning Application.

Please refer to DWG Ref. 240002-X-05-X-XXX-DR-DBFL-CE-3301 Drainage Longitudinal Sections by DBFL Consulting Engineers which provides details on how no new flow paths will be created, that an equivalent aquitard function is maintained post-development, and the depth of the aquitard should.

3.11c(3) - Chapter 5 of the Site Specific Flood Risk Assessment submitted is titled "Stage 3 Detailed Flood Risk Assessment & Management". This Site Specific Flood Risk Assessment does not meet the requirements of a Stage 3 Detailed Flood Risk Assessment as per the Flood Risk Management Guidelines. A Stage 3 assessment assesses flood risk issues in sufficient detail and provides a quantitative appraisal of potential flood risk to a proposed or existing development or land to be zoned, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

Please refer to section 5 of Site Specific Flood Risk Assessment by DBFL Consulting Engineers which meets the requirements of a Stage 3 Detailed Flood Risk Assessment as per the Flood Risk Management Guidelines. The SSFRA assesses flood risk issues in sufficient detail and provides a quantitative appraisal of potential flood risk to the proposed development, its potential impact on flood risk elsewhere and the effectiveness of proposed mitigation measures.

3.12a - With regards to potential contaminated land, it is not clear if works have been carried out and/or if any remediation plan has been approved by the EPA. Due to the former industrial use of the area, there is a possibility that the site is contaminated. The applicant should further consider prior to the commencement of the development,

engaging the services of a recognised environmental consultant with experience in the field of Land contamination to:

- i. Carry out a site investigation from a land contamination view point;***
- ii. Carry out a risk assessment;***
- iii. Recommend remedial measures; and***
- iv. Prepare a report containing all of the above in the standard format.***

This report shall be submitted to the local authority for its written approval before commencement of the development.

Please refer to Chapter 8 Land & Soils – Sections 8.4.2 and 8.6.5 and Chapter 9 Water & Hydrology – Sections 9.4.2, 9.5.4 and 9.5.9 of the submitted EIAR for details on the site investigations carried out for the adjoining proposed Strategic Housing Development which was granted planning permission by An Bord Pleanála (ABP Reference: ABP-309059-20) on the 4th of April 2021. The extent of the assessments included the site of the Proposed Development which is under the same ownership.

Site investigations were undertaken by Ground Investigation Ireland (GII,) under the supervision of WSP Ireland Consulting Ltd. (WSP) between October 2023 and January 2024. The results of the site investigation were used to inform the quantitative human health risk assessment (HHRA) (WSP, 2024a), the controlled waters risk assessment (CWRA) (WSP, 2024d) and the Materials Management and Remedial Strategy Plan (MMRSP) (WSP, 2024b) for the adjoining proposed Strategic Housing Development. The extent of the assessments included the site of the Proposed Development. It is noted that the HHRA (WSP, 2024a) included a review of the following historical site investigation reports:

RSK, 2018. Generic Quantitative Risk Assessment: Marquee Entertainment Venue, Marquee Road, Ballintemple, Cork City, Co. Cork. Dated 29 November 2018 (RSK Reference: 602303 – R01 (00).

RSK, 2019. Waste Classification Assessment: Marquee Entertainment Venue, Marquee Road, Ballintemple, Cork City, Co. Cork. Dated 24 June 2019 (RSK Reference: 602303 – R02 (00).

Priority Geotechnical (PGL), 2020. Marina Quarter Geoenvironmental Ground Investigation – Ground Investigation, Factual report. Dated 26 August 2020 (PGL Reference: JMS/Rp/P19189 + attachments).

Arup, 2020. Technical Note: The Former Ford Distribution Site – Geo-Environmental Summary Note V2. Dated 3 September 2020 (Arup Job Number: 268196-00.

Based on the findings of the HHRA (WSP, 2024a) and the recommendations of the MMRSP (WSP, 2024b) WSP attended the Site between February 2024 and July 2024 to undertake remedial excavations and collect soil validation samples across the base of the excavations of material remaining in-situ

post remedial excavation. The Soil Validation Report (WSP, 2024c) was reviewed to inform remedial works conducted at the site.

During the enabling (earth works) programme for the adjoining proposed Strategic Housing Development, WSP also completed surface water monitoring within open drainage channels along the northern and southern boundaries of the site and at down gradient surface water receptors (i.e., the Atlantic Pond and Lee (Cork) Estuary Lower) over the period August 2023 to September 2024 (i.e., prior to, during and after the enabling works) to monitor for potential impacts during these works. The results of the surface water assessment (WSP, 2024e) were reviewed to inform the baseline hydrological conditions and identify any potential impacts to receiving waters associated with the current site condition.

As discussed in Chapter 8 Land & Soils - Sections 8.4.2 and Chapter 9 Water & Hydrology – Section 9.4.2 of the submitted EIAR, it was determined based on professional judgement that in accordance with industry best practice guidance and standards there was adequate site-specific scientific data to inform the impact assessment of the Proposed Development on the receiving geological, hydrological and hydrogeological environment.

It is noted that based on the findings of the impact assessment completed in Chapter 8 and 9, as part of incorporated design mitigation for the Proposed Development and in advance of construction works commencing, the existing HHRA (WSP, 2024a) and CWRA (WSP, 2024d) will be refined based on the results of the in-situ soil validation samples collected at the site (WSP, 2024c) and post remedial groundwater monitoring. The refined HHRA and CWRA will be used to inform the remediation plan to ensure that residual sources of contamination in soil are removed offsite, to inform the proposed remedial design measures including the installation and performance specification of the vapour barrier and identify if any supplementary remedial works for groundwater are required.

3.12b - The applicant is requested to submit a Construction and Environmental Management plan with any planning application

Please refer to the Construction and Environmental Management Plan prepared by DBFL Consulting Engineers.

3.12.c - The applicant is requested to submit a Construction Waste Management Plan with any application. The applicant shall submit a construction and demolition waste management plan to the Planning Authority. This plan shall, inter alia, include the information recommended in sections 3.2, 3.3 and 3.4 of the document titled “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Development Projects” published by the Department of the Environment, Heritage and Local Government in June 2006.

A Construction Waste Management Plan was prepared by DBFL Consulting Engineers and accompanies this planning application.

3.13a - Given the location close to Pairc Ui Chaoimh and the future Eastern Gateway bridge, as part of the EIAR, further consideration should be given to a noise and lighting assessment being undertaken to identify any issues and proposed remediation measures.

The noise assessment forms part of Chapter 11 of the Environmental Impact Assessment Report which incorporates the effect of Pairc Ui Chaoimh and the future Eastern Gateway Bridge.

A lighting report by EDC which incorporates the effect of Pairc Ui Chaoimh and the future Eastern Gateway Bridge on the future lighting plan accompanies this planning application.

3.14a - The applicant is requested to submit an Operational Waste Management Plan. Prior to commencement of the development the Applicant shall submit to the Planning Authority for agreement, full details of the waste management proposed for the development. Details shall include proposals on waste reduction, reuse, and segregation, recycling, and vented storage as well as who will manage the waste, dispose of it and present it for collection. The applicant shall clearly identify vented bin storage area of appropriate capacity, clearly identifying on the drawing designated location for same with dimensions clearly visible. The applicant should refer to the British standards BS 5906: 2005 in relation to waste management in buildings to ascertain capacity required for development.

An Operational Waste Management Plan has been prepared by Enviroguide and accompanies this planning application.

3.14b - The applicant is requested to submit a Climate Action and Energy statement to demonstrate how low carbon energy, and heating solutions have been considered as part of the overall design and planning for the proposed development. Prior to commencement of development the developer shall submit to the Planning Authority for agreement, proposals for energy use within the development. The developer shall endeavour to use sustainable sources of energy, and to operate an energy conservation policy on the design and operation of the complex.

A Climate Action and Energy Statement was prepared by ENX Consulting Engineers and accompanies this planning application. The Statement demonstrates how low carbon energy, and heating solutions have been considered as part of the overall design and planning for the proposed

development. The developer will endeavour to use sustainable sources of energy, and to operate an energy conservation policy on the design and operation of the complex.

3.15a - The applicant is requested to submit documentary evidence showing that the subject site was purchased by the applicant within the Part V Transitional Arrangement Period of 1st September 2015 and 31st July 2021 with any planning application

The Conditions of Sale dated 18 June 2018 related to the property in question accompanies this planning application and serves as proof that the Part V Transitional Arrangement Period of 1st Sep 2015 to 31st July 2021 applies to the proposed development.

3.15b - The applicant is requested to submit Indicative unit costings with any planning application.

The Part V unit costings for the proposed development accompanies this planning application. These Part V unit costings have been agreed in principle with Cork City Council.

3.16a - The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals in respect of the proposed landscaping arrangements of the development, with particular focus on the following:

- ***The applicant is requested to submit full details regarding the boundary treatment on the south east adjoining the open space at application stage.***
- ***There are concerns regarding connectivity with The Marina Park Phase 1 , and public access through the proposed site. The applicant is requested to submit full details to be provided at application stage, including confirmation if the communal open space is completely gated.***
- ***The applicant is requested to submit cross sections required for all open spaces***
- ***The applicant is requested to confirm if the public open space to the South west of the site is being used for SUDs/drainage/attenuation tanks.***
- ***The applicant is requested to submit full design details of SUDS throughout the site at application stage***
- ***The applicant is requested to submit to remove Scots Pine from the planting palette***
- ***The applicant is requested to submit details of visualisation aids for the public and communal open spaces."***

- Please refer to the Landscape Sections prepared by Ait Landscape and Urbanism which provides full details of the boundary treatments proposed.
- As far as is feasible the public realm in the development meets with the levels of the existing grassland and wetland area adjoining the site and indicative path connections on DWG Ref. DR-0100 by Ait Landscape and Urbanism illustrate deliverable connections from the development to the Marina Park. It should be noted that the existing levels with the existing grassland and wetland area undulate significantly along the boundary with the proposed development from 1.5 – 3.0metre OD. It is not feasible to bring the public realm levels within the development down to 1.5m OD whilst maintaining universal access around the perimeter of the development and integrating with the Marian Quarter that is presently under construction.
- The Communal open space (Podium garden) will be gated.
- A series of Landscape Section drawings have been prepared by Ait Landscape and Urbanism and submitted with this application (see DWG Ref. DR 0401, 0402, 0403, 0404 and 0405).
- The extent of below ground attenuation is indicated on the submitted landscape Plans by Ait Landscape and Urbanism in blue dashed lines.
- The SuDS proposals are described in detail in the drawings and report prepared by DBFL Consulting Engineers. The locations of rain gardens and permeable paving are indicated on the Landscape Plans by Ait Landscape and Urbanism.
- Scots Pine has been removed from the Planting Palette and substituted for Pinus nigra. The Pine has been selected as a specimen used sparingly for its sculptural qualities and for Winter interest.
- A series of Computer Generated Images (CGIs) have been prepared by Modelworks and accompany this planning application.

3.17a - The applicant is requested to submit and Ecological Impact Assessment (EclA) as part of the proposed application.

The Ecological Impact Assessment forms part of Biodiversity chapter of the Environmental Impact Assessment Report.

3.17b - Within the PEA report submitted, wintering bird surveys were screened out due to lack of habitat. The applicant is requested to further consider that new wintering bird surveys are included especially with the site being very close to the Cork Harbour SPA and the surrounding habitats of the wetland beside the development, watercourse across the road and Atlantic Pond within 500 metres.

Please refer to Chapter 10 Biodiversity of the submitted EIAR which highlights the consultation with the council regarding this matter.

'Consultation was sought from Cork City Council (CCC) Environmental Department on the 11th of September 2024 regarding opinion on the exclusion of Winter Bird Surveys as a requirement for assessment of likely significant effects resulting from the Proposed Development, principally the effect on bird assemblages within 500m of the Proposed Development boundary. A response was received 17th of September 2024 where it was agreed by CCC that taking into account the suite of breeding bird surveys already carried out within 500m during the breeding season 2024, ecological appraisals of the Site, desk study and considerations of the small wetland area east of the Site, that further winter bird surveys would add little to our current knowledge of the baseline conditions and effects arising from the Proposed Development.

3.18 - There should be no interference with, bridging, draining, or culverting of, any adjacent river or any watercourse, its banks, or bankside vegetation to facilitate the proposed development, without the prior approval of IFI. Full details of proposals relating to same should be provided at application stage including reference to the IFI "Guidelines on protection of fisheries during construction works in and adjacent to waters" document.

Please refer to Chapter 9 Water & Hydrology of the submitted EIAR.

'Where possible, stockpiling of soils and subsoils onsite will be avoided. However, in the event that stockpiling is required, stockpiled materials, pending reuse onsite, will be located away from the location of any sensitive receptors (watercourses and drains). In accordance with Inland Fisheries Ireland guidelines, stockpiles will not be allowed within 50m of the open water where sufficient working areas are available within the Site boundary.

Surplus material, not suitable for reuse onsite, will be segregated, and stockpiled appropriately for removal offsite. For any excavated material identified for removal offsite, while assessment and approval of acceptance at a destination re-use, recovery Site or waste facility is pending, excavated soil for recovery/disposal shall be stockpiled as follows:

- A suitable temporary storage area will be identified and designated.
- All stockpiles will be assigned a stockpile number.
- Stockpiled soil and stone materials will be protected from exposure to wind by storing the material in sheltered regions of the Proposed Development Site.
- Soil waste categories will be individually segregated; and all segregation, storage & stockpiling locations will be clearly delineated on the Site drawing.

- Any waste to be temporarily stockpiled will be stockpiled only on hard standing on heavy gauge polythene sheeting and soil stockpiles will be sealed to prevent run-off of rainwater and leaching of potential contaminants from the stockpiled material generation and/or the generation of dust.
- There will be no storage of materials within 10m of any boundary, drains and watercourses'.

3.19 - A statement on how the development has considered climate resilience from design to implementation stages.

A Climate Resilience Statement was prepared by ENX Consulting Engineers and accompanies this planning application.

3.20 - As per Cork City Development Plan Sections 11.271-11.273, a Scheme Sustainability Statement should be submitted on how the development has considered climate mitigation and adaptation from design to implementation to operational stages. Carbon reduction, renewable energy on site and electric charging points for cars and bikes should be included within statement. Cork City Development Plan Objective 2.11 Low Carbon Economy and Chapter 11 Climate Action and Environmental Infrastructure should also be considered.

An Energy and Sustainability Report was prepared by EDC Consulting Engineers and accompanies this planning application.

3.21 - The site plans should clearly identify all / any wayleaves or rights of way across the application site in accordance with the requirements of article 127(2) of the Planning and Development (Strategic Housing Development) regulations 2017, as amended.

All and any wayleaves or rights-of-way across the site were reviewed and are noted on the following maps as 'Easement' which have been prepared by JFA Architects:

- DWG Ref. FRD-P0100-Site Location Map Overall Context Ordnance Survey
- DWG Ref. FRD-P1000-Site Location Map Ordnance Survey
- DWG Ref. FRD-P1001-Existing Site Layout Plan

3.22 - A proposed childcare facility should be included as part of the proposed development. Written confirmation that pre-application consultation has been undertaken with Cork City Childcare, and that their comments have been incorporated into the design of the proposed Childcare Facility.

Please refer to the submitted drawings by JFA Architect which show that a childcare facility has been included as part of the proposed development. The proposed design of the childcare facility was shared with the Cork City Childcare Committee. The comments and recommendations from the committee have been taken on board.

3.23 - An Invasive species management plan should accompany the application where such species are identified within the lands.

An Invasive Species Management Plan was prepared by Enviroguide and accompanies this planning application.

3.24 - In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.

A Statement of Consistency was prepared by McCutcheon Halley and accompanies this planning application.

3.25 - The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2022, unless it is proposed to submit an EIAR at application stage.

An Environmental Impact Assessment Report was prepared by McCutcheon Halley and accompanies this planning application.

3.26 - In accordance with Article 22 (2A)(b), of the Planning and Development Regulations 2001 (as amended), the applicant shall include, as part of a full LRD Application, a statement of response to the issues set out in this opinion.

This document serves as the design team's response to the Section 32B Opinion issued by Cork City Council 26 Aug 2024.

Appendices

Appendix A: Correspondence with Cork City Childcare Committee

Schalk Van Heerden

From: Christine Murray <christine@corkcitychildcare.ie>
Sent: Wednesday 13 November 2024 12:39
To: Schalk Van Heerden
Cc: Cork City Child Care Info
Subject: Cork City Childcare REPLY - Former Ford Distribution Plan on Centre Park Road
Attachments: Creche floor plan Former Ford Distribution Plan.pdf

NOTE: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Thank you allowing me the opportunity to submit my feedback on the Crèche Drawing for a proposed childcare facility in a Large-Scale Residential Development for c. 176 no. residential units comprising a mixture of 114 no. 2 and 3 apartments at the Former Ford Distribution Plan on Centre Park Road. Please find attached the document forwarded to Cork City Childcare on Monday 11/11/24 which now includes comments and points to consider for this proposed development. Cork City Childcare initially highlighted how it is essential to consider a large full-day childcare facility with a capacity for 54 to 80 children. The attached Creche is catering for 35 children.

There are some important adjustments needed for the childcare facility's design to meet Tusla requirements. From looking at the drawings, there are several critical areas that need attention in the proposed design for the childcare facility. Here's a breakdown of the revisions needed:

1. **Changing and Sanitary Areas:**
 - o Ensure that the changing and sanitary areas comply with Tusla requirements. Consider the number of toilets and layout of changing tables, privacy considerations, and proximity to classrooms.
2. **Room Ratios**
 - o Adjust the room layouts to reflect the required adult-to-child ratios. For example:
 - For the 1-2 yr old room: ensure it accommodates 5 children per adult. 2.8 square metres clear floor space per child.
 - For the 2-3 yr old room: ensure compliance with the 1:11 ratio during ECCE sessions and 1:8 outside those hours. A maximum of 22 children in a session. 2.35 square metres clear floor space per child.
 - For the 0 to 1 yr old room: ensure it accommodates 3 children per adult. 3.5 square metres clear floor space per child.
3. **Sleep Room Facilities:**
 - o Designate adequate space for sleeping areas, ensuring they can comfortably accommodate cots and beds while adhering to safety and hygiene standards.
4. **Storage Solutions:**
 - o Increase storage throughout the facility. This should include storage for toys, educational materials, bedding, and cleaning supplies, ensuring that these are easily accessible but out of reach of children.
5. **Sluice Room:**
 - o Incorporate a dedicated sluice room or area for cleaning products and sanitation supplies, ensuring it meets health and safety regulations and is separated from child-accessible areas.

Revising the design with these points in mind will help align the facility with Tusla requirements and create a safe, functional environment for both children and staff. Collaborating with a professional familiar with these

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standards will be beneficial as well. I have attached the TUSLA QRF, and Universal Guidelines for Planning for your attention.

- [Early Years Quality and Regulatory Framework Tusla - Child and Family Agency](#)
- [Universal Design Guidelines - Access and Inclusion Model](#)

Reviewing these documents will be essential in identifying specific changes required for the facility to meet compliance. It will also help ensure that the facility not only meets regulatory requirements but also provides a safe and nurturing environment for children.

If you need further support or clarity on any of the above, please feel free to contact me at the information below.

Kind regards,

Christine

Christine Murray
Development Officer
Cork City Childcare

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