

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

27th November 2018

Re: ABP Ref. ABP-301431-18
Application for a 5-year planning permission for the demolition of an existing dwelling, derelict coach house and farm buildings and the construction of 251 no. residential units, creche, play areas, the realignment of Cooney's Lane, the proposed minor diversion of the 38kv overhead line currently traversing the site and all associated infrastructural and site development works at Cooney's Lane, Graigue (townland), Grange, Co. Cork.

Dear Sir/Madam,

We act on behalf of the applicant Westbrook Housing Company Ltd., and wish to submit the enclosed Strategic Housing Development (SHD) planning application for the above referenced development to An Bord Pleanála under the provision of the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made following Pre-Application Consultation and the receipt of a Notice of Pre-Application Consultation Opinion issued by An Bord Pleanála dated 8th June 2018.

Please find enclosed 2 no. hard copies and 3 no. electronic copies of the following documentation and information, as requested under articles 297 and 298 of the Planning and Development Regulations 2001 to 2017. As amended, and in accordance with the additional information sought in the Boards Notice of Pre-Planning Application Consultation Opinion:

- **Cover letter** by McCutcheon Halley Planning;
- **Completed SHD Application Form**;
- **Press Notice** – Template;
- **Press Notice** – Evening Echo;
- **Site Notice**;
- **Letter of Consent** from Tom and Catherine Falvey, Damien Falvey and Paula Falvey;
- **Letter of Consent** from Cork County Council;
- Copy of **Notification Letters sent to Prescribed Bodies and Cork County Council**;
- **Statement of Consistency** by McCutcheon Halley Planning;
- **Planning and Design Statement** by McCutcheon Halley Planning;
- **Part V Methodology** by McCutcheon Halley Planning and accompanying **Part V Site Layout Plan** by Geraldine Coughlan Architects;
- **Schedule of Areas and Accommodation** by Geraldine Coughlan Architects;
- **Schedule of Drawings** by Geraldine Coughlan Architects;

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- **Site Location Maps** prepared by Geraldine Coughlan Architects;
- **Existing Site Survey** prepared by Geraldine Coughlan Architects;
- **Architectural Drawings & Schedule** prepared by Geraldine Coughlan Architects;
 - Site Layout Plans at 1:500;
 - Site Sections at 1:500;
 - Floor Plans, Elevations, and Sections at 1:200;
 - Photomontages
- **Building Lifecycle Report** by Geraldine Coughlan Architects;
- **Statement of Compliance with Universal Design** by Geraldine Coughlan Architects;
- **Design Statement** by Geraldine Coughlan Architects;
- **Landscape Plan** by Isla Rutgers Architecture;
- **Landscape Design Report** by Isla Rutgers Architecture;
- **Phasing Plan** by Geraldine Coughlan Architects;
- Plan (by Geraldine Coughlan Architects) of areas proposed to be **Taken in Charge**;
- **Existing building plans and elevations** prepared by Geraldine Coughlan Architects;
- **Site Specific Construction and Environment Management Plan** by JHK Consultants Ltd.;
- **Engineering Drawings & Schedule** by JHK Consultants Ltd.;
- **Engineering Planning Report** (including Confirmation of Feasibility from Irish Water and **Letter from Irish Water** confirming development is in line with Standard Details and Codes of Compliance) by JHK Consultants Ltd.;
- **Statement of Compliance / Consistency with DMURS** by Isla Rutgers Architecture;
- **Traffic and Transport Assessment** by MHL Consulting Engineers;
- **Traffic Calming Drawings** by MHL Consulting Engineers;
- **Public Lighting Report & Roadway Lighting Layout** by Molloy Consulting Engineers;
- **Ecological Assessment** by Kelleher Ecology Services Ltd.;
- **Screening in Support of Appropriate Assessment Report** by Kelleher Ecology Services Ltd.;
- **EIAR Screening Report** by McCutcheon Halley Planning;
- **School Demand Report** by McCutcheon Halley Planning;
- **Childcare Demand Report** by McCutcheon Halley Planning;
- **Architectural Heritage Impact Assessment** by Louise M. Harrington, Architectural Heritage and Historic Landscape Consultant;
- **Structural Conservation Condition Assessment Report** by Horgan Lynch;
- **Archaeological Assessment** by Lane Purcell Archaeology;
- Cheque for €34,220.48 made payable to An Bord Pleanála.

In the Board's Notice of **Pre-Application Consultation Opinion**, a number of issues were specifically identified relating to Density, Design, Layout and Unit Mix and Public Open Space which were to be addressed at application stage. The following provides an overview of these items and how/where these have been addressed in the submitted planning application material.

1. Density

Item 1 states:

Further consideration/justification of the documents as they relate to the density in the proposed development. This consideration and justification should have regard to, inter alia, the minimum densities provided for in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (May 2009) in relation to such sites. Particular regard should be had to the need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to Douglas and Cork City Centre and to established social and community services in the vicinity. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted relating to density and layout of the proposed development.

To address item 1, a revised layout and density is proposed, increasing the overall number of units significantly to 251 no. residential units. Given the inclusion of non-residential units (including the creche), significant infrastructure (access road, Cooney's Lane re-alignment, traffic calming measures along Cooney's Lane / Bellevue Road), topography and other site constraints (wayleave along the eastern boundary), the proposed density of the site has been calculated by omitting these 'undevelopable areas' from the overall site area to give a **net developable area of 7.7 ha**. Using the net developable area, the overall density has been calculated at **32.6 units per hectare**.

Section 5.11 of the **2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)** states that for 'Outer Suburban / Greenfield sites' the greatest efficiency in land usage will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities should be encouraged generally and that net densities less than 30 dwellings per hectare should generally be discouraged. Section 6.11 of the Guidelines states that for 'Edge of Centre Sites' densities should be within the range of 20-35 dwellings per hectare.

The **2014 County Development Plan (CDP)** includes policies for housing density that respect the Governments wish to deliver a sound return on infrastructure investment, particularly in relation to public transport, but also provide flexibility for developers to adapt to new market conditions and broaden the range of house types that can be built on zoned land (Section 3.4.5).

Table HOU 4-1 (Housing Density on Zoned Land) of the CDP provides an overview of the densities proposed on residential land including '**Medium A**' which has a density range of between 20-50 dwellings per hectare and is applicable in city suburbs, larger towns over 5,000 population and rail corridor locations. Apartment development is permissible on Medium A and a broad housing mix is normally required. Development within this density range must also connect to public water and waste water services.

It is submitted therefore that the overall density of **32.6 units per hectare** is consistent with the 2009 Guidelines on Sustainable Residential Development in Urban Areas for 'Edge of Centre Sites' and is also consistent with the density provisions of the 2014 CDP in relation to Medium A density – see Planning and Design Statement by McCutcheon Halley for more details.

2. Design, Layout and Unit Mix

Item 2 states:

Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the above mentioned Guidelines and the Design Manual for Urban Roads and Streets. In addition to density which is addressed above, the matters of unit mix; arrangement and hierarchy of streets; the creation of character areas within a high-quality scheme should all be given further consideration. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

To address item 2, a significant re-design and change to the layout and housing mix has been undertaken, based on the 12 criteria set out in the Urban Design Manual and the Design Manual for Urban Roads and Streets, which has resulted in a greater unit mix and re-configuration of the layout, and arrangement and hierarchy of streets. The revised layout also includes character areas for each neighbourhood, with its own distinctive character and environment. Overall it is submitted that the proposed development will provide a high-quality residential scheme and high quality urban extension to the Cork City South Environs.

3. Public Open Space

Item 3 states:

Further consideration of the documents as they relate to the open space proposed particularly in the context of the quantum of open space proposed, the surveillance of the open space, the usability of the active open space and proposals for passive open space in the context of landscaping proposals. In addition, further consideration of the documents as they relate to pedestrian and cycle facilities connecting the proposed development with Douglas, existing transport services, adjoining residential development and the area of zoned public open space to the east of the site. The further consideration of these issues may require an amendment of the documents and/or design rationale submitted.

To address item 3, the proposed layout has been revised to provide greater surveillance of the open space and amenity areas, and to increase the usability of the active open space of the site. The revised layout includes extensive landscaping and amenity areas including a kick about area, a basketball court, playgrounds, an amenity walkway along the southern and eastern boundaries of the proposed development, pocket parks, localised seating areas, garden parks and footpaths and cycle lanes. All of these amenity areas have been designed as integral components of the scheme and the layout has been revised to ensure that passive surveillance of these areas.

Connectivity to Douglas, existing transport services, the adjacent residential development of Ardfield and the area of zoned public open space to the east is enhanced by promoting permeability through the development and by creating new connections along natural desire lines. In addition to footpaths and pedestrian links running alongside the road system, a dedicated pedestrian greenway is provided along the southern and eastern boundaries. This walkway is connected to the neighbouring estate to the east. This allows residents direct access to the amenity facilities to the east of the site. This amenity walkway also provides residents with a dedicated route to the proposed creche at the north of the site. This walkway also enables residents to make their way safely to facilities on site and up to the main Grange Road where they can connect to the local bus and cycle routes which will take them directly to Douglas and Cork City centre.

The Board's Notice of Pre-Application Consultation Opinion also required the submission of the following information as part of the application for permission.

1. Drainage details, having regard to Pre-Connection Enquiry Report of Irish Water dated 22nd March 2018, together with section 4.6 of the planning authority report dated 14th May 2018.

Please refer to the Infrastructure Report and drawings by JHK Consulting Engineers which have regard to the Pre-Connection Enquiry Report of Irish Water together with section 4.6 of the planning authority report dated 14th May 2018.

2. A report identifying demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.

A School Demand Report by McCutcheon Halley Planning has been included as part of the SHD application.

3. A Building Lifecycle Report, as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2018).

A Building Lifecycle Report by Geraldine Coughlan Architects is included as part of the SHD application.

4. Archaeological Impact Assessment.

An Archaeological Assessment by Lane Purcell Archaeology is submitted as part of the SHD application.

5. Ecological Survey of existing buildings.

An Ecological Survey of the existing buildings by Kelleher Ecology Services is submitted as part of the SHD application.

6. A phasing plan for the delivery of the proposed development.

A phasing plan by Geraldine Coughlan Architects for the proposed development is included as part of the SHD application (Drawing Ref. PL 09).

7. A site layout plan indicating what areas are to be taken in charge by the planning authority.

A site layout plan by Geraldine Coughlan Architects indicating what areas are to be taken in charge by the Local Authority is included as part of the SHD application (Drawing Ref. PL10).

8. A Childcare Demand Report outlining anticipated demand likely to be generated by the proposal and the capacity of existing childcare facilities in the vicinity to cater for such demand.

A Childcare Demand Report by McCutcheon Halley Planning has been included as part of the SHD application.

9. Site Specific Construction and Environment Management Plan (CEMP).

A Site Specific Construction and Environment Management Plan (CEMP) by JHK Consultants Ltd. has been included as part of the SHD application.

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

1. The Minister for Culture, Heritage and the Gaeltacht;
2. The Heritage Council;
3. An Taisce;
4. Inland Fisheries Ireland;
5. Irish Water;
6. Transport Infrastructure Ireland;
7. Commission for Energy Regulation;
8. Local Childcare Committee.

We trust that this SHD application is to the satisfaction of An Bord Pleanála. Please contact the undersigned if you require any further details.



Yours sincerely,

Cora Savage
McCutcheon Halley