



Statement of Consistency

Proposed Strategic Housing Development 'The Farm',
Bessborough, Ballinure, Blackrock, Cork.

Client Estuary View Enterprises 2020 Limited
March 2022

Connecting people.
Connecting places.

Contents

Introduction	1
Purpose of Statement	1
National Policy	3
Rebuilding Ireland Action Plan for Housing and Homelessness	3
Project Ireland 2040: National Planning Framework	4
S. 28 Ministerial Guidelines	8
<i>Sustainable Urban Housing: Design Standards for New Apartments</i> : Guidelines for Planning Authorities 2020:	8
Urban Development and Building Heights: Guidelines for Planning Authorities 2018	13
Guidelines for Planning Authorities: Sustainable Residential Development in Urban Areas, 2009	15
Urban Design Manual: A Best Practice Guide	16
Design Urban Manual for Urban Roads and Streets, 2013	17
Childcare Facilities: Guidelines for Planning Authorities 2001	17
Universal Design Guidelines for Early Learning and Care Settings 2019:	18
Regional Planning Policy	19
Southern Regional Assembly: Regional Spatial and Economic Strategy	19
Cork Area Strategic Plan 2020 (CASP) and CASP Update 2008	21
Cork Metropolitan Area Transport Strategy (CMATS)	22
Local Planning Policy	24
Joint Housing Strategy: Cork Planning Authorities	24
Cork City Development Plan 2015-2021	25
Mahon Local Area Plan 2014	34
Appendix A Bus Frequency Information	
Appendix B Connectivity Mapping	

Introduction

Purpose of Statement

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 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 proposed development site, c.5.13 ha in area, is located on a predominantly greenfield site to the north of Bessborough House, on lands that were historically part of the parkland within the demesne and the farmyard at Bessborough House, Ballinure, Blackrock, previously in institutional use. The site is adjacent to Mahon District Centre and the Passage West Greenway to the east, the Cork Heritage Park Greenway to the west and bound to the north by the Bessboro Road and the Sacred Heart Convent with a local access road running along the eastern boundary and the Alzheimer Society of Ireland's Daycare Centre and a HSE support unit located to the north-east. It is approximately 5km from Cork City Centre.

The proposed development will provide for the demolition of 10 no. existing agricultural buildings /sheds and log cabin residential structure and the construction of a residential development of 140 no. residential apartment units over 2 no. retained and repurposed farmyard buildings (A & B) with single storey extension and 3 no. new blocks of 3-5 storeys in height, with supporting resident amenity facilities, crèche, and all ancillary site development works. The proposed development includes 140 no. apartments to be provided as follows: Block C (9 no. 1-bedroom and 25 no. 2-bedroom over 3 storeys), Block D (34 no. 1-bedroom & 24 no. 2-bedroom over 3-4 storeys), Block E (27 no. 1-bedroom, 20 no. 2-bedroom & 1 no. 3-bedroom over 4-5 storeys). It is proposed to use retained Block A and Block B for resident amenities which include home workspace, library, lounge and function space.

The proposal includes a new pedestrian/cycle bridge over the adjoining Passage West Greenway to the east, connecting into the existing down ramp from Mahon providing direct access to the greenway and wider areas, as well as new pedestrian access to Bessborough Estate to the north including upgrades to an existing pedestrian crossing on Bessboro Road.

The proposed development provides for outdoor amenity areas including publicly accessible parkland, landscaping, surface car parking, bicycle parking, bin stores, substation, public lighting, roof mounted solar panels, wastewater infrastructure including new inlet sewer to the Bessborough Wastewater Pumping Station to the west, surface water attenuation, water utility services and all ancillary site development works. Vehicular access to the proposed development will be provided via the existing access road off the Bessboro Road.

Part of the proposed development is situated within the curtilage of Bessborough House which is a Protected Structure (Reference: RPS 490).

An Environmental Impact Assessment Report and a Natura Impact Statement have been prepared in respect of the proposed development.

The statement of consistency has been compiled in a hierarchy according to National, and Local Policy. In accordance with the Board's Guidance for Prospective Applicants this statement is intended to be clear and concise in its demonstration that the proposed development is consistent with these policies. A summary of the relevant policy from each publication has been provided in tabular format with associated comments on how the proposed scheme is consistent with same.

National Policy

Rebuilding Ireland Action Plan for Housing and Homelessness

The action plan for housing and homelessness is based around 5 pillars, including the aim of building more homes as well as improving the rental sector. The plan includes a number of Action points relating to the 5 key pillars.

Policy	Consistency of scheme
<p>Pillar 3 – Build More Homes 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.</p> <p>The plan outlines a number of key steps that should be taken to deliver on the pillar three objective including:</p> <ul style="list-style-type: none"> 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. 	<p>The suitability of the subject site as a sustainable location within Cork City, as well as proposed mix of dwellings, 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.</p> <p>The proposed development falls under the Strategic Housing Development planning process aimed at fast tracking the delivery of much needed housing. In addition, as outlined below, the proposal is consistent with the National Planning Framework and its stated aim of consolidating new population and housing growth within the footprint of the main towns and cities.</p>
<p>The action plan notes “there is an acute shortage of apartment developments in the centre of Cork, despite a growing demand from new FDI-type employers establishing adjacent to the city centre, because of the gap between delivery costs and prices of second-hand homes in the wider Cork city area. Therefore, closing the supply gap, particularly in the right locations, is critically dependent on ensuring viability of housing provision, taking account of the prices that are affordable to potential buyers and renters.</p>	<p>The proposed development site is in a key sustainable location in close proximity to Mahon District Centre, where several FDI-type employers are established. The location is also served by a regular bus service to Cork City Centre, with Mahon identified as the terminus of the planned Light Rail Transit System. The proposed development is comprised wholly of apartment units. Both factors will ensure that the subject proposal contributes positively to addressing the acute shortage of apartment development in the wider Cork City area.</p>

Project Ireland
2040: National
Planning
Framework

The National Planning Framework outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is outlined as being to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.

Policy	Consistency of scheme																																
<p><i>National Policy Objective 2A</i> - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.</p> <p><i>National Policy Objective 3B</i> - Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</p> <p><i>National Policy Objective 4</i> - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</p> <p><i>National Policy Objective 8</i> - 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.</p>	<p>The proposed development is consistent with all strategic aims and objectives contained in the NPF. The development is in accordance with National Policy Objectives 2a, 3b, 8 and 11 which aim to increase Cork City and suburbs to a minimum population of 314,000 by 2040 and which will require a growth rate of 50-60%. The subject site is located adjacent to the existing population centre of Mahon. It is located in close proximity to Mahon Industrial Estate, Mahon District Centre and Blackrock Hall Primary Care Centre. These areas are employment and retail hubs.</p>																																
<p>Table 4.1 Ireland 2040: Targeted Pattern of City Population Growth</p> <table border="1"> <thead> <tr> <th rowspan="2">City</th> <th rowspan="2">Population 2016</th> <th colspan="2">Population Growth to 2040²⁷</th> <th rowspan="2">Minimum Target Population 2040</th> </tr> <tr> <th>% Range</th> <th>People</th> </tr> </thead> <tbody> <tr> <td>Dublin - City and Suburbs</td> <td>1,173,000</td> <td>20-25%</td> <td>235,000 - 293,000</td> <td>1,408,000</td> </tr> <tr> <td>Cork - City and Suburbs</td> <td>209,000</td> <td>50-60%</td> <td>105,000 - 125,000</td> <td>314,000</td> </tr> <tr> <td>Limerick - City and Suburbs</td> <td>94,000</td> <td>50-60%</td> <td>47,000 - 56,000</td> <td>141,000</td> </tr> <tr> <td>Galway - City and Suburbs</td> <td>80,000</td> <td>50-60%</td> <td>40,000 - 48,000</td> <td>120,000</td> </tr> <tr> <td>Waterford - City and Suburbs</td> <td>54,000</td> <td>50-60%</td> <td>27,000 - 32,000</td> <td>81,000</td> </tr> </tbody> </table>	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	<p>The excellent public transport provision augments the connectivity of the subject lands provided by proximity to the Passage West Greenway Cork and the Heritage Park Greenway. In combination these underpin the sustainability of the proposed development. The proposed housing mix ranging from 1 bed apartments to 3 bedroom units, highlights the aim of the developer to provide homes for a diverse range of households in compliance with Objective 4, while the high quality architectural and landscape design when viewed in conjunction with this connectivity will ensure that it is an attractive and liveable place.</p>
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<p><i>National Policy Objective 11</i> - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</p>																																	

National Policy Objective 13–

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

The proposed 1-5 storey development is in line with the 1-5 storey height considered appropriate in principle in major development as outlined in the Cork City Development Plan (CCDP). We consider the scale of the development complies with this and is appropriate to this sustainable 'Accessible Urban Location', having regard to the landscape and cultural heritage sensitivities that pertain to this site.

Chapter 4 of the accompanying Environmental Impact Assessment Report (EIAR) includes a Townscape and Visual Impact Assessment prepared by Macroworks that notes that the proposed development is an '*appropriate contribution to the built fabric of the study area that will not result in any significant townscape or visual impacts*'.

Car parking in the scheme will be reduced to 54 no. on-street resident spaces at a standard of 1 space per c. 2.59 units. 4 no. creche drop off spaces are also proposed. Parking spaces will include EV charging points, further encouraging sustainable travel.

National Policy Objective 27:

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritizing walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

The promotion of walking and cycling is an integral element of the design proposal. As the enclosed Landscape Design Strategy indicates direct pedestrian and cycling connectivity is provided to the Passage West Greenway via a proposed new pedestrian bridge over the greenway. This greenway connects the city centre with Mahon and Rochestown. The greenway and the adjoining less used Cork Heritage Park Greenway will provide future residents with a pleasant and quality recreational amenity whilst also providing a safe and accessible method of getting to and from employment centres such as Cork City and Mahon. The proposed development is also within a 5 minute walk of the 202 high frequency bus stop to the north and 215/219-bus stop to the east (combined average 10-minute peak frequency of service) providing connections to Cork City again accessed via the Passage West greenway. The application is supported by a Walking and Cycling Audit and a Mobility Management Plan prepared by MHL & Associates, which concurs with this assessment.

National Policy Objective 32 - To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33 - To prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Objective 32 and 33 of the NPF emphasizes the importance of providing additional homes in locations that can support sustainable development. The Key Future Growth Enablers for Cork include the development of an enhanced public transport corridor. This includes an east-west corridor from Mahon through the city centre to Ballincollig.

Key Future Growth Enablers for Cork Include;

The development of a much-enhanced Citywide public transport system to incorporate subject to further analysis, proposals for an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport;

Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Monard.

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 Service.

The Cork Metropolitan Area Transport Strategy (CMATS) sets out proposals for a Light Rail Transit (LRT) along this corridor. This proposed LRT will augment the existing excellent connectivity of the subject lands and the sustainability of the proposed development

The lands in question are zoned ZO4 – Residential, Local Services and Institutional Uses and ZO 12 – Landscape Preservation Zone. The pertaining site-specific objectives relating to the latter allow for development immediate to the north of Bessboro House, subject to it being consistent with the landscape and protected structure significance of the site. Subsequent to the S247 meeting ShipseyBarry Architecture have worked closely with the Cork City Architect to ensure that the subject proposal is sensitive to these considerations. This has resulted in a reduction of the proposed density of 51.5 units/hectare at the S247 presentation to the current density of 32.7 units/hectare (of the developable area). Therefore, it is considered that the proposal achieves an appropriate density within the constraints of the land zoning and the design therefore achieves a sustainable use of development land, whilst appropriately respecting the sensitivities of the site.

It will contribute directly to the realisation of compact growth and provide a critical mass of population to underpin the viability of the enhanced public transport and will also promote sustainable mobility across the site and to other areas. Furthermore, it will contribute towards achieving the national strategic outcomes of enhanced amenity and heritage and access to quality childcare.

National Policy Objective 35-

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

The proposed development represents the opportunity to develop lands that were within the lands of a former institutional use. The site is in close proximity to Mahon District Centre, and crucially the proposed 1 - 5 storey development represents a sensitive infill development that aims to balance the landscape and heritage sensitivities of the site while contributing directly to a positive increase in residential density in a predominantly low density residential area. Given that this area is within the corridor of the proposed LRT high frequency public transport infrastructure, it is considered that residential development at this site is appropriate and warranted.

National Policy Objectives 64:

Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban

The proposed development is consistent with the strategic aims of the NPF as it will result in a appropriate density development on an infill greenfield site in a

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.

suburban area which is supported by public realm and urban amenities.

The proposed development is located adjacent to the popular Passage West greenway, a cycle and walkway which connects the city centre, Mahon and Rochestown via the Passage West greenway. In addition, it is adjacent to the connected Cork Heritage Park Greenway. The proposed development includes provision for linkage with this greenway via a new pedestrian bridge. This will facilitate easy access to Mahon District Centre and Cork City Centre. The proposed development at this location will encourage future residents to use walking and cycling as their dominant mode of travelling.

Furthermore, within this highly constrained site where arboricultural and heritage constraints pertain, the orientation of kitchen/dining/living areas, internal and external communal spaces have been organised to maximise solar aspect for comfort with 40.7% dual aspect achieved on apartments. In addition, sustainable surface water drainage systems are employed through the use of sedum-based green roofs. All buildings are designed to current NZEB standards high insulation values and efficient energy systems and roof mounted solar panels are included in the design.

S. 28 Ministerial Guidelines

This section provides an outline of what we consider to be the relevant Guidelines issued by the Minister in accordance with Section 28 of the Planning and Development Act 2002 - 2019, namely the *Design Standards for New Apartments: Guidelines for Planning Authorities 2020* and the *Urban Development and Building Height Guidelines for Planning Authorities 2018*.

Section 28(1)(c) of the Planning and Development Act 2002 – 2019 specifies that these guidelines:

“may contain specific planning policy requirements that, notwithstanding subsection (1), are required to be applied by planning authorities and the Board in the performance of their functions”

Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2020:

The 2020 Guidelines refer to the need to significantly increase supply as a key pillar of the overarching Rebuilding Ireland Housing Action Plan. Urban Areas are identified as the most suitable locations for apartments and are divided into 3 categories: 1. Central and/or Accessible Urban Locations, 2. Intermediate Urban Locations, 3. Peripheral and/ or Less Accessible Urban Locations.

Policy	Consistency
<p>Section 2.4 of the Guidelines define Central and/or Accessible Urban Locations' as:</p> <p>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;</p>	<p>We consider that the proposed development site can be defined as a Central and / or <u>Accessible Urban Location</u>, that is suitable for small to large scale development at higher density that may comprise wholly of apartments as demonstrated by the enclosed Connectivity Map (Appendix B) as it is:</p> <ul style="list-style-type: none"> ▪ Within walking distance Mahon, a strategic employment location, which includes Mahon Point Retail Park and Mahon Industrial Estate. These are major employment centres in Cork City. ▪ The site is within a 5 minute walking catchment of the high frequency (10 minute peak frequency) 202 bus services to the north at Skehard Road.

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.

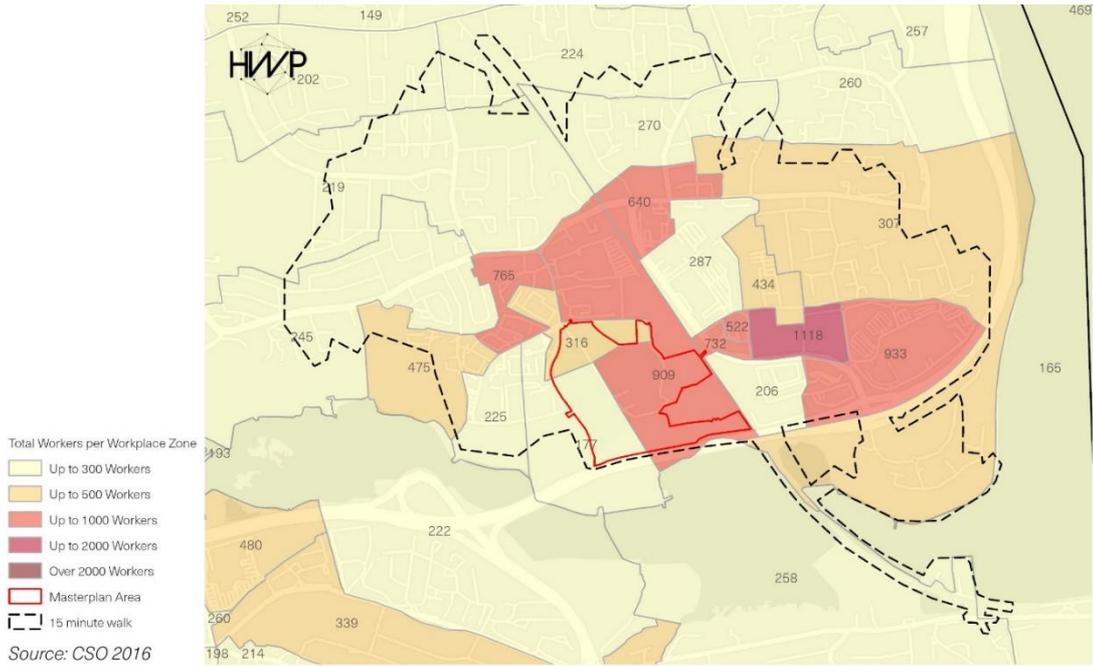
These definitions are meant to be interpreted as typical rather than 'exhaustive' and the Guidelines indicate that the full range of locations 'will require local assessment that further considers these and other relevant planning factors'.

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

- The 215/ 215A routes are served by a bus stop outside the City Gate, accessible to the immediate east of the site via the Passage West Greenway. The 215 bus serves Mahon, Cork City Centre and Blarney and operates at 15 min intervals at peak time while the 215A also serves this area operating at 30 min intervals from Jacobs Island to South Mall. The 219 bus also uses the bus stop next to the subject site. In combination, they provide an average peak (c.7:00-9:00 am, 16:00-18:00 pm) frequency of service every 10 minutes during the week.
- Providing connections to services such as Cork University Hospital and Cork Institute of Technology.
- The Cork Metropolitan Area Transport Strategy (CMATS) 2040 was published in Q1 of 2020. This strategy proposes the development of an east to west Light Rail Transit (LRT) rapid transport corridor as an objective for Cork City.
- CMATS proposes that a tram stop will be located adjacent to the subject site at Mahon Point. The 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas promote the development of higher densities at 'lands within existing or planned transport corridors.

CMATS proposes that the LRT will be preceded by a high-frequency bus service between Mahon and Ballincollig. This will be delivered in the short-term to underpin higher development densities along the corridor including the regeneration of the Cork City Docks.

We consider it important to note that Section 2.4 (1) of the Guidelines acknowledges that the appropriate scale and density will vary subject to the location. Given the Landscape Preservation Zoning of the majority of the subject site it is considered that the proposal achieves an appropriate density within the constraints of the land zoning and the design therefore achieves a sustainable use of development land, whilst appropriately respecting the sensitivities of the site.



Mahon: A Strategic Employment Location
Total Workers per Workplace Zone



Source: BusConnects Cork

• Bus Stops — Bus Routes 5 Minutes Walk Masterplan Area
Mahon: Access to high frequency public transport

Specific Planning Policy Requirement 3
Minimum Apartment Floor Areas

All apartments to be provided within the scheme are 1-3 bedroom and, as outlined in the Housing Quality Assessment prepared by ShipseyBarry Architecture (ref the

- Studio apartment (1 person) – 37 sq. m
- 1-bedroom apartment (2 persons) – 45 sq. m
- 2-bedroom apartment (3 persons) – 63 sq. m
- 2-bedroom apartment (4 persons) – 73 sq. m
- 3-bedroom apartment (5 persons) – 90 sq. m

accompanying Design Statement), are all in excess of the minimum required floor areas.

In addition, and in accordance with Section 3.8 of the Guidelines on Safeguarding Higher Standards, the Board will note from the Housing Quality Assessment that 55.7% of the total units within the proposal are 10% over the minimum required gross floor area.

Specific Planning Policy Requirement 4

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

As outlined in the Housing Quality Assessment (ref the accompanying Design Statement), the proposed scheme achieves dual aspect in 40.7% of the proposed units. This is in excess of the 33% minimum for central and/or accessible locations as outlined in the 2020 Apartment Guidelines.

Specific Planning Policy Requirement 5

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Ground level floor to ceiling heights of in excess of 2.7 metres are provided for in the proposed apartments.

Section 4.17:

A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.

In order to meet the quantity requirements as outlined in the 2020 guidelines, the applicant would need to provide a total of 281 bicycle parking spaces when resident and visitor parking is accounted for (ref Table below).

Type	No Units	Bike Space Requirement
Studio	-	-
1 bed	70	70
2 bed	69	138
3 bed	1	3
Visitor	-	70

Total	140	281
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The applicant has provided for 330 bicycle spaces which is in excess of the general minimum standard. 230 resident spaces are being provided, with 100 bike spaces being provided for visitors.

Resident bicycle parking is provided in interior storage areas by way of a two-tier parking rack system, which are accessible only by residents and will be well lit and maintained by the management company. Visitor bicycle parking is provided in external areas adjacent to the buildings.

Appendix 1:

Minimum floor areas for private amenity space:

Studio- 4 sq.m

One bedroom- 5 sq.m

Two bedroom (3 person) 6 sq.m

Two bedroom (4 person) 7 sq.m

Three bedroom- 9 sq.m

This standard has been met with all apartments enjoying either terraces or balconies that are compliant with the minimum area requirement for private open space (ref the accompanying Design Statement - Housing Quality Assessment Section prepared by ShipseyBarry Architecture).

Minimum floor areas for communal amenity space:

Studio- 4 sq.m

One bedroom- 5 sq.m

Two bedroom (3 person) 6 sq.m

Two bedroom (4 person) 7 sq.m

Three bedroom- 9 sq.m

The proposal provides for 2,563 m² of communal residential open space, with an overall provision for 27,136 m² of public open space (63.3%). This is significantly in excess of the minimum communal amenity space requirement of 830 m². However, in view of the Landscape Preservation Zoning it is considered that this quantum is appropriate to preserve the sensitive elements of the site.

Urban
Development and
Building Heights:
Guidelines for
Planning
Authorities 2018

The guidelines published in 2018 have arisen from a recognition that the ambitious targets contained within the NPF, particularly in relation to accommodating 50% of future growth within the existing footprint of our cities, will not be met unless developments of greater height and scale are supported by the Planning Authorities. The guidelines refer to the traditional building heights in our urban areas which have been limited and generally low rise in terms of height. The need to secure compact and sustainable urban growth forms will require the reuse of brownfield infill sites that are located in well serviced urban locations and are served by good public transport links.

Policy	Consistency
<p>The guidelines refer to locations that would be considered City and town centres, such as within the ring in Dublin and other analogous areas in other cities. In such areas, the guidance suggests that building heights of at least 6 storeys should be supported at street level, particularly where there are concentrations of enabling infrastructure to cater for such development and where architectural, urban design and public realm outcomes would be of very high quality.</p> <p>Section 2.8 refers to Historic Environments and their sensitivity to large scale and tall buildings. In response to this the guidance proposes that:</p> <p>“an examination of the existing character of a place can assist planning authorities, and others to:</p> <p>establish the sensitivities of a place and its capacity for development or change and;</p> <p>define opportunities for new development and inform its design.</p> <p>Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting</p>	<p>The proposed development, located within the environs of Cork City, is immediately adjacent to the major employment hub of Mahon District Centre. The City Development Plan recognizes 'Mahon as a Key Development Area'. The proposed 1-5 storey height is appropriate considering the Landscape Preservation Zoning and the site's adjacency to the District Centre where 1-5 storeys are the norm and therefore consistent with these guidelines.</p> <p>Existing and proposed enabling infrastructure including the planned public transport upgrade for a light Rail Transit corridor (LRT) from Mahon to Ballincollig as outlined in the CMATS are capable of accommodating the proposal.</p> <p>The proposed development will provide for a high quality architectural, urban design and public realm outcome in this location as outlined in the various supporting documentation.</p> <p>The proposed development includes extensive analysis of the existing character and sensitivities of the area including Chapter 4 of the accompanying EIAR which contains a Landscape/Townscape Visual Impact Assessment (LVIA), Chapter 10 of the EIAR which assess the cultural heritage impacts. It is also supported by a detailed Architectural Design Statement. This analysis has informed a sympathetic architectural and public realm / landscaping design that will provide a more appropriate land use and an enhancement to the area that befits its historic character.</p> <p>The proposal delivers:</p> <ul style="list-style-type: none"> • Sustainable, compact development, on a key greenfield site adjacent to significant commercial/ retail and employment areas

the National Strategic Objective to deliver compact growth in our urban centres?

- On targets with national, regional and local planning objectives
- Development that promotes sustainable modes of travel i.e. walking, cycling, public transport
- The proposed development is in accordance with the zoning and landscape objectives of Cork City Development Plan.

SPPR1 -

In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/City cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

While the proposed development site is considered ideal for residential development due to its strong connectivity and accessible location, there is a requirement to moderate any increase in scale in view of the site's predominant zoning. Given the Landscape Preservation Zoning of the majority of the subject site it is considered that the proposal achieves an appropriate height and density within the constraints of the land zoning and the design therefore achieves a sustainable use of development land, whilst appropriately respecting the sensitivities of the site.

The accompanying EIAR includes extensive material such as a Landscape/Townscape Visual Impact Assessment, and a Cultural Heritage Assessment which are in support of this approach.

SPPR4 -

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;
2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

The location of the site at the interface between the traditional City and the County areas, yet adjacent to the District Centre of Mahon renders it suitable for the proposed mix of building heights and typologies: with the taller, higher density units in close proximity to the Mahon District Centre and close to the two local greenways and proposed enhanced public transport route, while the smaller, lower density buildings are to the south of the site, in keeping with the grain of the adjacent Bessborough House. While unified by the agricultural theme, mono-type buildings are avoided by the wide mix of unit types and a number of different apartment block designs.

Guidelines for Planning Authorities: Sustainable Residential Development in Urban Areas, 2009

The Sustainable Residential Development in Urban Areas, 2009 provides statutory guidelines which will assist planning authorities, developers, architects and designers in delivering high quality residential development. The objective of the document is to produce high quality and crucially sustainable developments. The guidelines mentioned in the table below are aimed at assisting planning authorities, developers, architects and designers create quality homes and neighbourhoods at places where people want to live, work and raise families.

Policy	Consistency
<p>The specific guidelines are as follows:</p> <ul style="list-style-type: none"> The Role of Design Sustainable Neighbourhoods Cities and Larger Towns The Home and its Setting 	<p>A Design Statement prepared by ShipseyBarry Architecture and a Planning Statement prepared by HW Planning accompanies this submission which addresses the guidelines listed in order to create a sustainable place and neighbourhood where people want to live and work.</p>
<p>Section 4.2 <i>In institutional lands and 'windfall' sites which are often characterised by a large private or institutional building set in substantial open lands and which in some cases may be accessible as an amenity to the wider community, any proposals for higher density residential development must take into account the objective of retaining the "open character" of these lands, while at the same time ensuring that an efficient use is made of the land. In these cases, a minimum requirement of 20% of site area should be specified; however, this should be assessed in the context of the quality and provision of existing or proposed open space in the wider area. Whilst the quantum of open space may be increased vis-à-vis other sites, the amount of residential yield should be no less than would be achieved on any comparable residential site. Increasing densities in selected parts of the site subject to the safeguards expressed elsewhere may be necessary to achieve this.</i></p>	<p>As highlighted in the accompanying Landscape Design Strategy prepared by Ilsa Rutgers Landscape Architecture, the provision for public open space at 63.3% of the site area, is in accordance with the minimum 20% requirement for Institutional lands.</p>
<p>Section 4.27: Historic Buildings: <i>'The main issues likely to arise in the context of residential development relate to potential impacts on either protected structures (including curtilages) or architectural conservation areas. Detailed advice is provided in the Architectural Heritage Protection Guidelines issued by the Department in 2004. There is</i></p>	<p>The proposed development is in close proximity to Bessborough House protected structure. ShipseyBarry Architects have liaised closely with the project archaeologist, John Cronin and Associates, and Rutgers Landscape Architecture to ensure that the architectural integrity of Bessborough House is</p>

a need to be creative in re-using protected buildings and in making them accessible to people with disabilities, whilst respecting their architectural integrity, as this is the most likely way that they will be properly maintained and retained as part of our cultural heritage.s'

respected and any impacts on its curtilage are minimised.

Section 5.7: Appropriate locations for increased densities outlines:

'where such significant sites exist and, in particular, are close to existing or future public transport corridors, the opportunity for their re-development to higher densities, subject to the safeguards expressed above or in accordance with local area plans, should be promoted, as should the potential for car free developments at these locations'

The proposed development is in close proximity to the proposed Light Rail Transit (LRT) east to west rapid transport corridor which serves Mahon, Cork City Centre and Ballincollig as proposed in CMATS. It is envisaged that a tram stop will be located adjacent to the subject site at Mahon point. The proposed density has been moderated in view of the landscape and cultural heritage sensitivities. However, in this context we consider the densities is justified as the existing Passage West Greenway will provide easy walking access to the envisaged LRT tram stop.

Section 5.10: Institutional Lands

'A considerable amount of developable land in suburban locations is in institutional use and/or ownership. Such lands are often characterised by large buildings set in substantial open lands which in some cases may offer a necessary recreational or amenity open space opportunity required by the wider community. In the event that planning authorities permit the development of such lands for residential purposes, it should then be an objective to retain some of the open character of the lands, but this should be assessed in the context of the quality and provision of existing or proposed open space in the area generally. In the development of such lands, average net densities at least in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in selected parts (say up to 70 dph).'

The subject site was previously within the demesne of Bessborough House, institutional lands, which accord with the description set out in Section 4.2 of a large building set in substantial open space. The underlying design rationale has been to retain this "open character" while ensuring the efficient use of the zoned lands. 63.3% of the site is proposed for open space (in excess of the requirement in Section 4.20 of the Guidelines). It is considered that this is appropriate in light of the Landscape Preservation zoning and the protected structure status of Bessborough House and its curtilage.

At a density of 32.7 units/hectare, the proposed layout balances achieving an appropriate residential yield with the sensitivities of the site by clustering increased densities in the south-eastern portion of the site, adjacent to Mahon District Centre and the Greenway where the proposed development is partially screened by Bessborough House itself. The traditional parkland character of the north of the site is retained and enhanced.

Urban Design Manual: A Best Practice Guide

The proposed residential development on lands to the northern portion of the former institution lands 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 neighborhood. A comprehensive Design Statement prepared by ShipseyBarry

Architecture accompanies this application which addresses the proposed developments compliance with these 12 criteria.

Design Urban Manual for Urban Roads and Streets, 2013

The Design Manual for Urban Roads and Streets provides guidance relating to the design of urban roads and streets. The document presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to street networks and individual streets. The relevant principles, approaches and standards listed in the table below are intended for use by suitably qualified and experienced designers who work within the built environment professions in order to create attractive streets and roads which facilitates a broad range of users.

Relevant Principles and Guidelines	Consistency
Integrated Street Networks Movement and Place Permeability and Legibility Management Movement, Place and Speed Streetscape Pedestrian and Cyclist Movement Carriageway Conditions	<p>This application is supported by a Statement of DMURS Compliance prepared by MHL Consulting Engineers. This statement addresses the relevant policies and principles listed in the Design Manual for Urban Roads and Streets, 2013 in order to create a balanced and attractive street and road network for the proposed development.</p> <p>This application is also accompanied by a Traffic and Transportation Assessment (TTA) prepared by MHL Consulting Engineers.</p>

Childcare Facilities: Guidelines for Planning Authorities 2001

The National Childcare Guidelines for Planning Authorities 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.

Policy	Consistency
Appendix 2: In new communities/ new housing areas, planning authorities should require the provision of at least one childcare facility for new housing areas and other areas of residential development unless there are significant reasons to the contrary. An indicative standard of one childcare facility per 75 dwellings is recommended. One facility providing a	<p>The proposed development is a residential scheme consisting of 140 units. The proposal aims to deliver one childcare facility with capacity for 25 child spaces. This amount of provision is in accordance with the indicative standard recommended in the 2001 childcare guidelines for Planning Authorities.</p>

minimum of 20 childcare facilities is considered to be a reasonable starting point
 The threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas

The Statement of Childcare Provision prepared by HW Planning which accompanies this application sets out the rationale for providing 25 childcare spaces.

Circular PL 3/2016:

in March 2016, the Department of the Environment, Community and Local Government issued a circular in relation to childcare facilities under the early Childhood Care and Education (ECCE) Scheme. Planning Authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 – including the minimum floor area requirements per child- from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning applications.

The proposed development has taken cognisance of this letter in relation to development of the creche on the site.

Universal Design Guidelines for Early Learning and Care Settings 2019:

In 2019, the Minister for Children and Youth Affairs launched the Universal Design Guidelines for Early Learning and Care Settings. These guidelines are an important step in making all Early Learning and Care services accessible to all children. This publication offers guidance on the refurbishment, renovation and building of centres for Early Learning and Care in Ireland. The guidelines apply to both new-build and retrofit projects and provide a flexible Universal Design framework to ensure that settings are accessible, understandable and easy to use for all children, staff, families and visitors.

Policy

An ELC setting should be well integrated with the local community and set within a high-quality public realm where the adjacent footpaths, streets and roads are accessible, understandable and easy to use for all families and ELC practitioners. The approach to the site should create a positive relationship between the setting and the community. The site design should provide a safe, comfortable and stimulating environment with high-quality pedestrian, cycling, parking, and pick-up and drop-off facilities

Consistency

The proposed creche is situated in a well-integrated location within a high-quality public realm and complies fully with this requirement.

Regional Planning Policy

Southern Regional Assembly: Regional Spatial and Economic Strategy

The Regional Spatial and Economic Strategy (RSES) sets out a 12-year strategic development framework for the Southern Region. 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 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:

- *Nurture all our places to realise their full potential;*
- *Protect and enhance our environment;*
- *Successfully combat climate change;*
- *Achieve economic prosperity and improved quality of life for all our citizens;*
- *Accommodate expanded growth and development in suitable locations; and*
- *Make the Southern Region one of Europe’s most creative, innovative, greenest and liveable regions.*

Policy	Consistency
<p>RPO 5 – Population Growth and Environmental Criteria</p> <p>Increased population growth should be planned with regard to environmental criteria including:</p> <p>The assimilative capacity of the receiving environment.</p> <p>The proximity of Natura 2000 Sites and the potential for adverse effects on these sites and their conservation objectives.</p> <p>Areas that have potential to flood.</p>	<p>The proposed development is located in close proximity to an existing major population centre and proposed increases in population are in accordance with the objective of the National Planning Framework as reflected in the RSES.:</p> <p>The pertaining site-specific objectives relating to the subject site allow for development immediate to the north of Bessboro House, subject to it being consistent with the landscape and protected structure significance of the site.</p> <p>The proposed development is in close proximity to Cork Harbour Special Protection Area. The application is accompanied by a Natura Impact Statement prepared by Dixon Brosnan Ecological Consultants</p>

which includes an assessment of the potential impacts of the development on this European Site. It concludes that *'it has been objectively concluded following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted effects from the proposed development and with the implementation of the mitigation measures proposed, that the construction and operation of the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects.'*

The proposed development does not fall within a flood risk zone. Nonetheless the application is accompanied by a site-specific flood risk assessment prepared by JB Barry & Partners, which concludes that the subject development is at risk of flooding.

RPO 9 - Holistic Approach to Delivering Infrastructure

It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including:

Water services, digital, green infrastructure, transport and sustainable travel, community and social, renewable energy, recreation, open space amenity, climate change adaptation and future proofing infrastructure including flood risk management measures, environmental improvement, arts, culture and public realm.

The proposed development will provide for increased population growth in an area that is well served by existing public transport linkages and will promote non- car modes of transport.

The proposed public realm improvements will provide an enhanced level of amenity in the area and will improve the overall pedestrian and cyclist experience.

Furthermore, the subject site is not formally publicly accessible in its current form. The proposed development will result in enhanced public access to amenity areas on these lands.

RPO 10 – Compact Growth in Metropolitan Areas

The prioritisation of housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.....

The identification of public realm and site regeneration initiatives which combine, on an area wide basis, opportunities for regeneration of private owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm areas.....

Ballinure is ideally placed for additional compact growth development. The proposed development site represents a predominantly greenfield site in lands zoned where appropriate residential development can be accommodated. It was previously within the curtilage of a former institutional use. While the site is under-utilised it is located in close vicinity to several employment centres in Mahon and is also well connected to Cork City centre through frequent bus services and the Passage West Greenway.

Section 5.0: Housing and Regeneration

Section 5.0 identifies strategic housing and regeneration locations within the Cork Metropolitan area. Achieving NPF growth targets will require in depth consideration for new locations. Mahon is identified as a strategic housing location along the potential light rail corridor. Below are the RSES objectives and infrastructure priorities for the Mahon region:

Potential Residential Yield: 1021 units

New public transport bridge and route linking via Bessboro to Mahon.

Expansion and upgrading of amenity areas and walking/ cycling routes.

Investment in retrofitting infrastructure and services (physical, social and recreational) to improve quality of life for communities.

The proposed development at this predominantly greenfield site will assist in achieving the targets set out by the RSES for the Mahon region.

The proposal will deliver:

The proposal will deliver 140 units which will contribute directly towards achieving the housing yield objective of 1021 units for the Mahon Area. Improved connectivity between the former Bessboro Estate and Mahon by means of a proposed pedestrian bridge over the Greenway.

Provision of a creche, café and public amenity space to enhance the social and recreational infrastructure of the area.

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 the following:

Policy	Consistency
<p>To move towards a more sustainable form of development for the Cork Area.</p> <p>To improve access and accessibility.</p> <p>To promote integrated land use /public transport strategy.</p> <p>To match the location of new housing as closely as possible with the location of employment growth centres.</p> <p>To require an overall rise in housing densities and development that is concentrated rather than dispersed</p>	<p>The subject lands are located in a strategic location in the Cork Metropolitan Area. The provision of the proposed development will assist in achieving the housing targets identified in the 2008 CASP update.</p> <p>The proposed development has been designed in accordance with the concept of improving access and accessibility and would promote the integration of public transport and land-use planning.</p> <p>The proposed scheme matches the location of housing with employment growth centres as it is located in close proximity to Mahon Industrial Estate and Mahon District Centre.</p>



Appropriate density targets will be met to support efficient public transport in the context of the sites zoning. However, given the Landscape Preservation Zoning of the majority of the subject site it is considered that the proposal achieves an appropriate density within the constraints of the land zoning, whilst appropriately respecting the sensitivities of the site. A net density of 32.7 units per hectare in this context will ensure that the lands are developed in a sustainable way and will support public transport as proposed as part of the overall masterplan for Mahon

Cork
Metropolitan
Area Transport
Strategy
(CMATS)

The Cork Metropolitan Area Transport Strategy (CMATS) has been published in the context of the National Planning Framework (NPF) which envisages that Cork will become the fastest growing city region in Ireland in the coming years. This projected population and associated economic growth will result in a significant increase in the demand for travel. This demand needs to be managed and planned for carefully to safeguard and enhance Cork's attractiveness to live, work, visit and invest in.

Policy	Consistency
<p>Key outcomes for walking in the strategy include:</p> <p>An increase in walking levels for work, education and leisure across the CMA, particularly for short journeys (less than 2-3km);</p> <p>Addressing the safety issues and barriers that prevent citizens and visitors from walking more in Cork;</p> <p>Supporting a high quality and fully accessible environment for all abilities and ages by continuing to develop a safe, legible and attractive public realm;</p> <p>Facilitate walking's role as part of linked trips, particularly with rail and bus journeys; and</p> <p>Promote a far higher standard of urban design in new developments, and in highway design, in a fashion that consistently prioritises pedestrian movement and safety over that of the private car.</p>	<p>The proposed development has been designed accordingly to facilitate walking and cycling as a primary mode of travel to and from the proposed apartments.</p> <p>The proposed development emphasises pedestrian and cycle links and makes provision for a new access point onto the Passage West Greenway via a new pedestrian bridge. This greenway provides safe and attractive amenity routes. The proposed access route onto this and the connected Cork Heritage Park Greenway also enables future residents' easy access to the Mahon District Centre and Mahon Industrial Estate, both major employment centres in the area.</p> <p>The proposed development via this access point is approximately a 5 minutes' walk from the 202/202A routes, a high frequency service operating every 10 minutes at peak times. The site is also c. 5 minute walking distance from a number of other frequent bus routes namely the 215, 215 A and 219 which have a combined 10 minute frequency at peak times. The 215 and 215A provides bus services to Blarney via Cork City Centre at 15 and 30 minute intervals while the 219 provides bus services to the 3rd level institution (Cork Institute of Technology) at 1hr intervals via Cork City Centre. See Appendix A '215/215A Mahon City Gate Stop – Frequency of Service' for further information.</p>

The provision of LRT system will be a focal point to enable the growth of population, employment health and education uses as envisaged by the NPF 2040. The LRT system is a key enabler in CMATS. The LRT is required to:

Unlock strategic development areas in its catchment area including the Cork City Docks, Curraheen, Ballincollig and Mahon;

Maximise the development potential of windfall sites;

Provide greater certainty for future Planning and development, to pursue higher densities required to meet NPF population and employment targets for Cork City;

Based on CMATS, the Ballinure site will be located c. 5-10 minute walking distance from the LRT with Mahon Point identified as a proposed stop. The planned development of the LRT therefore underpins:

- The development potential of the Bessborough, Ballinure site, which should be maximised in order to benefit from the infrastructural investment in the LRT.
- The applicant's pursuance of residential development within this Landscape Preservation Zone is justified in view of the sites sustainability and will contribute towards securing NPF population targets.
- The proposed minimal parking included with the development (38.6%) will encourage residents to avail of other modes of transport.

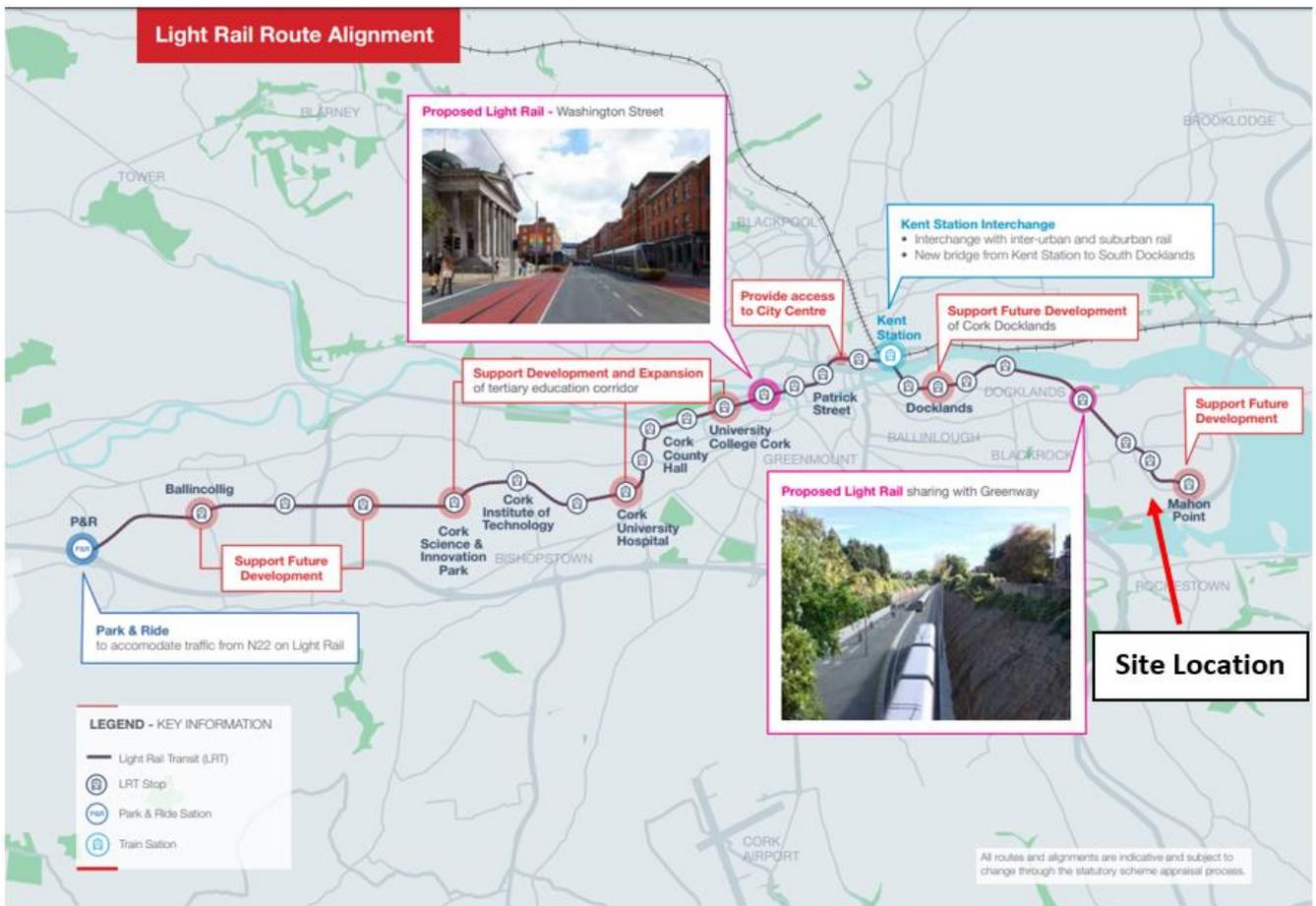


Figure 01: Proposed LRT route (CMATS 2019)

Local Planning Policy

Joint Housing Strategy: Cork Planning Authorities

The Joint Housing Strategy was produced in accordance with the adopted County and City Development Plans for the respective planning authorities in 2014-2015. The purpose of the housing strategy is to ensure that the proper planning and sustainable development of Cork City and County provides for the housing of the existing and future population of the area in an appropriate manner. The housing strategy sets out an overall framework for the supply of land to meet the housing needs arising in the county. Four key principles underpin the strategy with the relevant principles applicable to the proposed development illustrated in the table below:

Policy	Consistency
<p>Principle 1:</p> <p>To provide for a diverse range of housing needs to suit varying income levels and social circumstances</p>	<p>The proposed development has been designed to cater for a community with a range of household sizes. The scheme provides for a mix of different units including 1, 2 and 3 bed apartments. This housing mix of units will cater for a variety of users including singles, couples and small families across the full age spectrum.</p> <p>The layout has been designed to enable easy access by all and complies with Part M of the Building Regulations. Building for Everyone: A Universal Design Approach. The design of the proposed development is in accordance with the 12 criteria for residential development as outlined in the 2009 Urban Design Manual: A best practice guide (ref. enclosed Architectural Design Statement prepared by ShipseyBarry).</p>
<p>Principle 2:</p> <p>To promote a socially balanced and inclusive society in all housing areas within Cork City and County</p>	
<p>Principle 3:</p> <p>To promote high quality and sustainable communities in the Urban and Rural Environment, through the implementation of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas published in May 2009</p>	

The City Development Plan is Cork City Council’s main strategic planning policy document intended to guide the development of the city up to 2022. The Plan outlines the vision for Cork over the lifetime of the Plan and beyond to

“be a successful, sustainable regional capital and to achieve a high quality of life for its citizens and a robust local economy”

Among the main goals outlined in the Core Strategy of the Plan are to:

Increase population and households to create a compact sustainable city;

Achieve a higher quality of life, promote social inclusion and make the city an attractive and healthy place to live, work, visit and invest in; and

Promote sustainable modes of transport and integration of land use and transportation

The vision for the Mahon area is to develop the remaining greenfield land in a sustainable way creating a balance between residential and employment uses in the Mahon area. It is also an objective to upgrade the provision of public transport in the area.

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

Policy	Consistency
<p>Objective 14.1: Mahon Local Area Plan</p> <p>The local area plan vision for Mahon will be achieved by:</p> <ul style="list-style-type: none"> 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 	<p>The proposed development consists of a residential development located within the environs of Mahon built up area. The proposed development will contribute to a positive increase in population that is consistent with the CCDP and NPF objectives.</p> <p>The provision of permeable and connected pedestrian and cycle infrastructure represents a key element of the design concept. The proposed development is designed to function as an extension to the existing pedestrian infrastructure in Mahon. It is well connected to Mahon District Centre, Mahon Industrial Estate and Cork City Centre through the provision of new pedestrian infrastructure linking to the existing greenway pathways. This will be in the form of a direct link to the Passage West Greenway via a proposed new bridge. The design proposal contributes positively towards increasing the permeability of the site. The juxtaposing of new accessible housing adjacent to a number</p>

<p>e. Conserving landscape, built heritage and environmental assets.</p>	<p>of strategic employment hubs located in Mahon will support a modal shift to non-car modes of travel.</p> <p>The accompanying EIAR, specifically Chapters 4, 9 and 10 indicate that the proposed development has been cognisant of the sensitivities of the site and will not significantly impact on the landscape, built-heritage and environmental assets of the area.</p>
<p>Objective 14.7: Mahon District Centre</p> <p>To ensure Mahon District Centre is developed as a high-quality shopping, leisure, working, residential and urban environment in accordance with the local area plan and the Retail Strategy.</p>	<p>The proposed development will also provide the critical mass of population necessary to support and enhance Mahon District Centre as a high-quality shopping, leisure, working and residential neighbourhood. The proposed development will increase footfall in the area enhancing the viability of certain facilities in the area.</p>
<p>Z0 4: Residential, Local Services and Institutional Uses</p> <p>To protect and provide for residential uses, local services, institutional uses, and civic uses, having regard to employment policies outlined in Chapter 3.</p>	<p>The north-eastern portion of the subject lands are zoned residential, local services and institutional uses. The proposed residential development is compatible with the zoning policy for this site. The proposal will contribute directly to a positive increase in housing provision in the area.</p>
<p>Objective 10.5: Landscape Preservation Zones</p> <p>To preserve and enhance the character and visual amenity of Landscape Preservation Zones through the control of development. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape and achieves the respective site-specific objectives, as set out in Table 10.2.</p> <p>SE 4: Bessboro House</p> <p>Site Specific Objectives</p> <p>To reinstate Historic Landscape</p> <p>To seek use of grounds as a Neighborhood Park in context of local area plan.</p> <p>To allow development within the immediate environs to the North of Bessboro House consistent with the landscape and protected structure significance of the site.</p> <p>Specific Landscape Assets to be protected are listed as: J,G,C,B,I which Table 10.1 identifies as:</p>	<p>The majority of the subject site is located within the Landscape Preservation Zone. Objective 10.5 of the CDP indicates that development '<i>will be considered only where it safeguards to the value and sensitivity of the particular landscape and achieves the respective site specific objectives</i>'.</p> <p>The site-specific objectives for SE4 promotes development within the immediate environs to the north of Bessboro House consistent with the landscape and protected structure significance of the site. As the subject site is within the immediate northern environs of the house we consider that the principle of the proposed development is acceptable within the zoning objective.</p> <p>The accompanying Landscape Design Strategy prepared by Ilsa Rutgers Landscape Architecture illustrates that the proposed development can be delivered while safeguarding and reinstating historic landscape. Historical paths will be reinstated; large areas of the park will be re-wild; a 20-year programme of tree management will be undertaken to reinstate visual character. The development of The Farm and The Park precincts will reuse and reinstate buildings of heritage value, historical geometry and distinguishing</p>

J - Historic Landscapes (including monuments / historic routes)

G - Landmarks / Natural Features / Cultural Landscape – land forming the setting to existing landmark buildings and/or protected structures / buildings of significance.

C - Tree Canopy – Areas with existing woodlands or significant tree groups, or areas with potential for new woodlands.

B - Water / River Corridors – rivers, estuary, harbour, The Lough, Atlantic Pond, Docklands, Port of Cork

I - Institutional Open Space.

features of historic parkland. The defined landscape assets and will be protected and the site specific objectives will be delivered. The accompanying Landscape Design Strategy includes focused commentary on how these specific landscape assets will be protected as part of the overall design approach.

Subsequent to the S247 meeting ShipseyBarry Architecture has worked closely with the Cork City Architect to ensure that the subject proposal is sensitive to these considerations. This has resulted in a reduction of the proposed density of 51.5 units/hectare at the S247 presentation to the current density of 32.7 units/hectare. Therefore, it is considered that the proposal achieves an appropriate density within the constraints of the land zoning and the design therefore achieves a sustainable use of development land, whilst appropriately respecting the sensitivities of the site.

Chapter 4 of the submitted EIAR contains an LVIA prepared by Macroworks.

Objective 10.4: Areas of High Landscape Value

To conserve and enhance the character and visual amenity of Areas of High Landscape Value (AHLV) through the appropriate management of development, in order to retain the existing characteristics of the landscape, and its primary landscape assets. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape. There will be a presumption against development where it causes significant harm or injury to the intrinsic character of the Area of High Landscape Value and its primary landscape assets, the visual amenity of the landscape; protected views; breaks the existing ridge silhouette; the character and setting of buildings, structures and landmarks; and the ecological and habitat value of the landscape

The north-eastern portion of the proposed development is located within an area of high landscape value. In 2020 an Historic Landscape Assessment was prepared for the entire Bessborough Estate by Forestbird Design which highlighted the significant landscape zones (ref . Appendix 1 - Landscape Design Strategy). These included: Zone A to the south of the estate, comprising open landscape including an historic pond, folly and graveyard; Zone B comprising a woodland of mature trees along the western and northern boundary; and Zone C which comprised a walled garden and historic farm buildings. The avoidance of impacts on these zones has informed the selection of areas where development is proposed.

Particular features of interest in the wider estate site include an ornamental lake, demesne wall, folly, existing mature trees, farm buildings and Bessboro House. The constraints specific to the site were taken into account including mature trees and the adjoining historical features.

As Figure 2 indicates, the only area within the proposed residential development site that was deemed to be a sensitive landscape was the area of the Zone B woodland along the northern boundary. In the design proposal, careful consideration was given towards protecting these intrinsic features which positively contribute towards the character of the High Landscape Value Area.

As the accompanying Landscape Design Strategy prepared by Ilsa Rutgers Landscape Architecture indicates, very little

new landscaping is proposed for this area and the wider park precinct area, where the 'existing palette of trees and lawns will be retained and enhanced with new native species to replace those trees lost at a ratio of 2:1 and the creation of areas of meadow and more natural wild grasses'. All of the proposed residential building will be in land of low landscape sensitivity. The refurbished farm buildings will form the core of the farm precinct, with a central kitchen garden courtyard. This echoes the character of the walled garden and historic farm buildings in Zone C, immediately to the south of the subject site.

Figure 2 – Historic Landscape Sensitivity Assessment



Objective 11.13: Amenity Routes

To pursue the development of a network of high-quality amenity routes, particularly along waterways, and linking existing and proposed parks and public open spaces, and to work with Cork County Council and other stakeholders to achieve and improve external linkages subject to Ecological Assessment and Appropriate Assessment Screening.

South East: Mahon Industrial Estate-through Bessboro-South Link Walkway

The proposed development is located immediately adjacent to the Passage West Greenway amenity route and the Cork Heritage Park Greenway. The design proposal provides new pedestrian infrastructure to enable future residents to utilise these connected amenity routes. This will be in the form of a direct link to the Passage West Greenway via a proposed pedestrian bridge. The proposed development will contribute positively to the amenity routes, enhancing the linkage between the two routes, offering passive surveillance and further strengthening the quality of the amenity routes.

Objective 10.6: Views and Prospects

To protect and enhance views and prospects of special amenity value or special interest and contribute to the character of the City's landscape from inappropriate development, in particular those listed in the development plan. There will be a presumption against

Chapter 4 of the EIAR prepared by Macroworks concludes that on balance, the receiving townscape setting sensitivity is Medium. In reviewing the potential landscape and visual effects of the proposed development, it assesses the magnitude of the construction impacts to be medium. And the operational impacts range from medium- low. Nineteen viewpoint locations have been selected as the basis for photomontages in the included LVIA for 'The Farm'. These

development that would harm, obstruct or compromise the quality or setting of linear views of landmark buildings, panoramic views, rivers prospects, townscape and landscape views and approach road views.

To identify and protect views of local significance through the preparation of local area plans, site development briefs and the assessment of development proposals on a case-by-case basis

have been selected as representative of local views and prospects and the locations have been agreed with Cork City Council. The LVIA considers that the proposed development is an appropriate contribution to the built fabric of the study area that will not result in any significant townscape or visual impacts.

Objective 10.10: Trees and Urban Woodland

a. To protect and enhance the city's tree and urban woodlands

b. To protect, survey and maintain existing important individual and groups of trees

d. To ensure that new development benefits from adequate landscape structure / tree coverage, particularly in areas of the city with inadequate tree coverage

The proposed development has been designed to protect and enhance the existing mature trees in the area. In 2020 an Historic Landscape Assessment was prepared for the entire Bessborough Estate by Forestbird Design (ref . Appendix 1 - Landscape Design Strategy) which identified the constraints of the site and identified areas suitable for residential development. A 20-year strategy has been developed to proactively manage trees on the site with a view to reinstating visual character. A lot of low value trees have been planted on the site since the 1990s and these will be thinned and replaced with new native deciduous and evergreen trees along the perimeter and in clumps on the western side of the road. It is proposed to plant new trees at a ratio of 2 new native and naturalised trees to every removed tree providing for a significant net gain in woodland.

Care has been taken in the design to minimise the impact on Category A and B trees. The removal of 54 no. trees is proposed, 3 no. of which is to accommodate the proposed pedestrian bridge. Compensatory planting of 116 new, predominantly native trees is proposed to offset any impact.

Objective 7.7: Childcare Facilities

Cork City Council will support the provision of high-quality childcare facilities throughout the city suited to the needs of a given area and will:

Require purpose built childcare facilities as part of proposals for new residential developments of more than 75 dwelling units. However, where it can be clearly established that existing facilities are sufficient, alternative arrangements will be considered;

Consult with the Cork City Childcare Company and the HSE on planning applications where childcare facilities are proposed;

Require employers with more than 500 members of staff to provide childcare facilities

The proposed development is a residential scheme consisting of 140 units. The proposal aims to deliver one childcare facility with capacity for 25 child spaces. The provision is in accordance with the indicative standard recommended in the 2001 childcare guidelines for Planning Authorities.

The Statement of Childcare Provision prepared by HW Planning which accompanies this application sets out the rationale for providing 25 childcare spaces.

as part of planning applications for significant new and extended development.

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 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 aims to balance the sensitivity of the landscape and heritage of the Bessborough Estate with the need for residential development with the view to providing efficiencies in terms of land use and to ensure the viability of current and future transport infrastructure including the Light Rail Transit (LRT) east-west corridor from Mahon, through the City Centre to Ballincollig.

The provision of parking below maximum levels is aimed at reducing car ownership within the scheme. The proposed development will see residential development at a sustainable location and further encourage this modal shift towards walking, cycling and public transport as the dominant mode of travel among future residents in the Mahon Area.

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.

A *'Traffic and Transportation Assessment'* prepared by MHL Engineering Consultants accompanies this application highlighting how the proposed development would address traffic and transportation issues, traffic generation, pedestrian and cycle linkages and safety and public transport availability and capacity.

Objective 6.6: Housing Mix

To encourage the establishment of sustainable residential communities by ensuring a mix of housing and apartment types, sizes and tenures is provided. Planning applications for multiple housing units shall submit a Statement of Housing Mix detailing the proposed mix and why it is considered appropriate. The needs of special groups such as the elderly and disabled shall also be considered as part of this process.

The proposed development provides for a mix of 1, 2 and 3 bed apartments to cater for a variety of users including singles, couples, small families across the full age spectrum. The accompanying Design Statement prepared by ShipseyBarry Architecture includes a Housing Quality Assessment outlining the exact housing mix of the proposed development.

The accompanying Statement on Material Contravention prepared by HW Planning considers the proposed housing mix in the context of the Council's development standards.

Objective 9.17 Development on Burial Grounds

Cork City Council will seek to preserve and enhance historic burial grounds and their settings. Where former burial grounds are in use as amenity spaces then their retention for passive recreational use will be required.

Development in and adjacent to these areas will be limited and may also be subject to archaeological conditions.

No development is proposed on a burial ground. The applicant has engaged with the Cork Survivors & Supporters Alliance (CSSA). The proposal is set back from the Folly and adjoining areas of perceived sensitivity which are in separate ownership and there is no interrelationship between the proposed development site and these areas.

In response to Objective 9.17, the overall Masterplan design incorporates a 'Remembrance Park', in recognition of the legacy of the Bessborough Mother and Baby home that was located within the former estate and the sensitivities that relate to that former use.

The proposed Neighbourhood Park will be located to the south of Bessborough House and is intended to be ceded to the city or other relevant stakeholders for full implementation. We refer you to the submitted Architectural Design Statement prepared by ShipseyBarry for further detail (See page 43 – "Remembrance Park – Phase 3").

Objective 16.1: Design Statement

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.

The proposal is accompanied by a detailed Planning Statement prepared by HW Planning and a Design Statement prepared by ShipseyBarry Architecture which include a thorough examination of the site context and the associated design response.

Objective 16.2: Visual Impact Assessment

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

Chapter 4 of the accompanying EIA report includes a Townscape/Landscape and Visual Impact Assessment report carried out by Macroworks, which assesses the visual impact of the proposed development.

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.

The proposed development is consistent with the strategic aims of the NPF as it will result in a residential development of an appropriate density on a largely greenfield site within the urban fabric of a suburban area. The area is well supported by public realm and urban amenity. The proposed development proposes to connect with the existing strong walking, cycling and public transport linkages to the adjacent Mahon District Centre and Cork City Centre.

Objective 16.9: Sustainable Residential Neighbourhood

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;

The proposed development accords with the specific objectives of 16.9 as it aims to deliver.

- A high-quality residential development with 63.3% of the site dedicated to public, open spaces.
- The proposed development of 140 apartments includes a range of communal residential facilities while also making provision for a creche. Furthermore, it is well connected to the existing urban amenities and services in Mahon.
- The site location will encourage the use of the excellent existing walking, cycling and public infrastructure in the area. An integral element of the proposed design is enhancing the legibility of the Bessborough Estate lands connection with the two greenways while also improving the interlinkage between the two greenways.
- The proposal will be developed according to a high-quality standard of architectural design and will assist in strengthening and reinforcing the distinct character of Bessborough.

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

- Accessibility and connectivity to the site will be a key feature as outlined in the accompanying connectivity map (ref Appendix B). New access points will be created to increase the permeability of the site.
- The proposed net density of 32.7 units per hectare and plot ratio of 0.35 are appropriate to the site in view of the High Value Landscape Designation and Landscape Preservation zoning that pertain to the lands and the Protect Structure status that applies to Bessborough House and its curtilage. Given these constraints the proposed development presents an opportunity to promote the efficient use of these sustainable, well-connected lands in proximity to Mahon District Centre.
- The proposed housing mix is consistent with the latest guidelines and will provide for identified housing need in the area.
- The submitted EIAR includes a Landscape/Townscape and Visual Impact Assessment and a chapter on Biodiversity and Cultural Heritage. These, assess the potential impacts of the proposed development on the built and natural heritage of the lands. The accompanying Landscape Design Strategy and Design Statement set out the design approach adopted and mitigation measures proposed to protect the built and natural heritage.

Table 16.4: Indicative Targets for Dwelling Size and Distribution;

One bedroom- max 20%
Two bedroom- min 30%
Three bedroom- min 50%

The accompanying Statement on Material Contravention prepared by HW Planning considers the proposed housing mix in the context of the Council's development standards. The housing mix ranges specified in the 2020 Apartment Guidelines take precedence over the Development Plan (see section on 2020 Guidelines above).

Table 16.5: Minimum Overall Apartment Gross Floor Areas –

One bedroom 55 sq. m.
Two bedroom / 3 persons 80 sq. m.
Two bedroom / 4 persons 90 sq. m.
Three-bedroom 100 sq. m.
Four-bedroom 115 sq. m.

The accompanying Statement on Material Contravention prepared by HW Planning considers the proposed unit sizes in the context of the Council's development standards. The minimum dwelling sizes specified in the 2020 Apartment Guidelines take precedence over the Development Plan (see section on 2020 Guidelines above)

Car Parking- Zone 3

Residential- 1 per unit + 0.25 Visitor (Maximum Provision)

The proposed development provides 58 car parking spaces (54 no. resident spaces, and 4 no. drop-off spaces). This is below the development plan standards. This is justified however given its accessible location directly adjacent to Mahon District Centre with existing strong public transport and cycling infrastructure.

Mahon Local Area Plan 2014

The Mahon Local Area Plan (now lapsed) contained a vision to transform the area into a cohesive, connected and well serviced neighborhood and employment area.

Policy	Consistency
<p>The Plan outlined certain objectives in order to achieve this vision. Among the key objectives introduced as relevant to the proposed development are as follows:</p> <p>To encourage a diverse and appropriate range of uses to meet the needs of Mahon as a place to live, work and visit;</p> <p>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;</p> <p>To ensure a range of high-quality new homes to promote choice and achieve a social mix;</p> <p>The consolidation of development to address severance and lack of connectivity between uses and areas</p> <p>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;</p> <p>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.</p>	<p>It is considered that the proposed development of a residential development with associated connectivity enhancements at 2 no. of the overall 5 no. opportunity sites identified in the LAP is in line with the objectives of the plan.</p>

The Mahon Local Area Plan 2014 provides detailed objectives and policies for the subject lands and wider Bessborough Estate. In Figure 4.5b of the LAP the subject site is identified as containing 2 no. of the overall 5 no. opportunity sites within the Bessborough Estate.

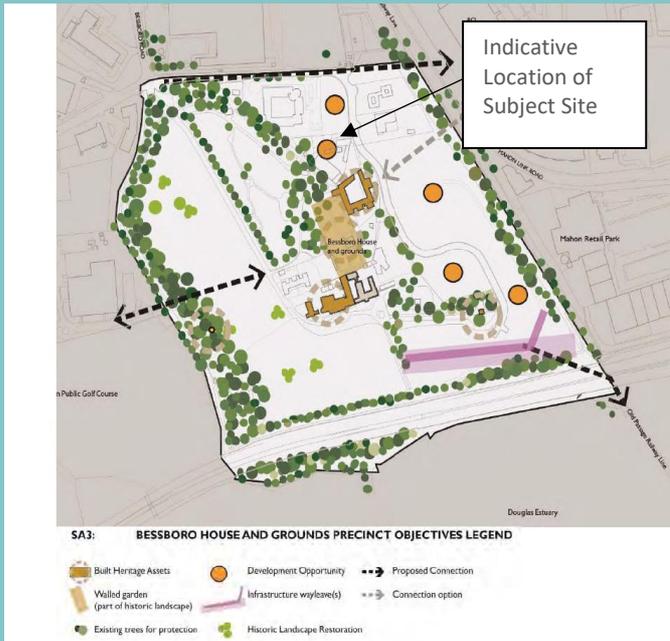


Figure 3: Bessborough House and Grounds Precinct Objectives

Appendix A – 215/215A Mahon City Gate Stop – Frequency of Service

The following tables were prepared using public transport timetables for public buses operating on the 30th of March 2022. All tables relate to the frequency of service at the Mahon City Gate bus stop, identified in Figure 1 below. Tables have been prepared for the following peak travel times:

- 07:00 – 09:00
- 12:00 – 14:00
- 16:00 – 18:00

1.1 Morning Peak Waiting Times

Route Name	Destination	Time of Departure	Wait Time (minutes)
219	Bishopstown	07:04	-
215	Cloghroe	07:08	00:04
215A	Cork City	07:18	00:10
215	Cloghroe	07:33	00:15
219	Mahon	07:47	00:14
215A	Cork City	07:50	00:03
219	Bishopstown	07:55	00:05
215	Cloghroe	08:09	00:14
215A	Cork City	08:25	00:16
215	Cloghroe	08:39	00:14
215A	Cork City	08:55	00:16
219	Mahon	08:59	00:04
219	Bishopstown	09:05	00:06
Morning Peak Average Wait Time			10 minutes

1.2 Midday Peak Waiting Times

Route Name	Destination	Time of Departure	Wait Time (minutes)
219	Bishopstown	12:05	-
215	Cloghroe	12:09	00:04
215A	Cork City	12:24	00:15
215	Cloghroe	12:39	00:15
219	Mahon	12:52	00:13
215A	Cork City	12:54	00:02
219	Bishopstown	13:05	00:11
215	Cloghroe	13:09	00:04
215A	Cork City	13:24	00:15
215	Cloghroe	13:39	00:15
215A	Cork City	13:54	00:15
219	Mahon	14:00	00:06
	Midday Peak Average Wait Time		10 minutes

1.3 Evening Peak Waiting Times

Route Name	Destination	Time of Departure	Wait Time (minutes)
219	Mahon	16:03	-
215	Cloghroe	16:04	00:01
219	Bishopstown	16:05	00:01
215A	Cork City	16:24	00:19
215	Cloghroe	16:29	00:05

215A	Cork City	16:54	00:25
215	Cloghroe	16:59	00:05
219	Mahon	17:01	00:02
219	Bishopstown	17:05	00:04
215A	Cork City	17:24	00:19
215	Cloghroe	17:29	00:05
215A	Cork City	17:54	00:25
219	Mahon	17:58	00:04
Evening Peak Average Wait Time			9 minutes

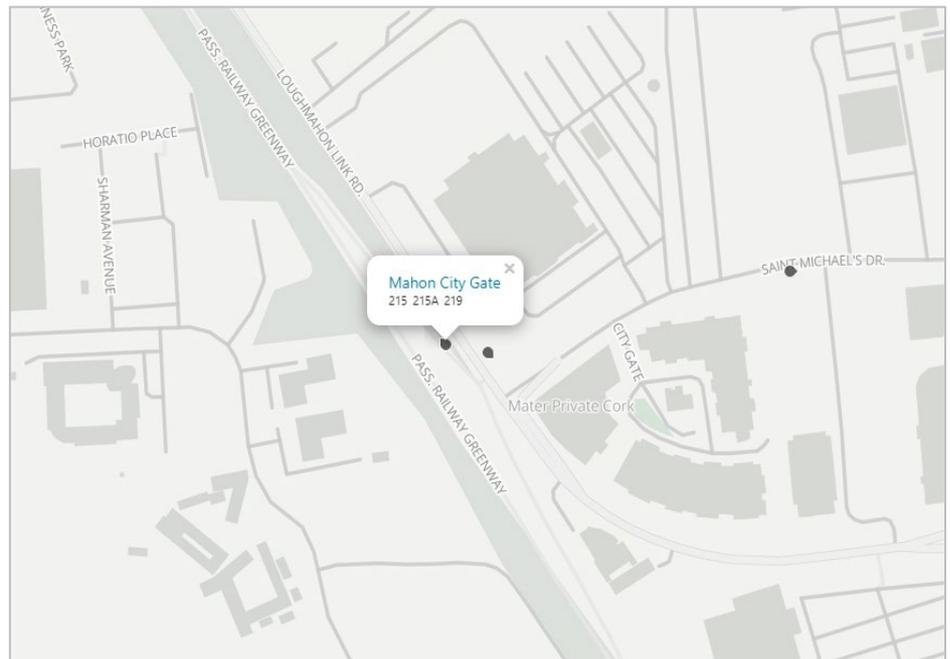
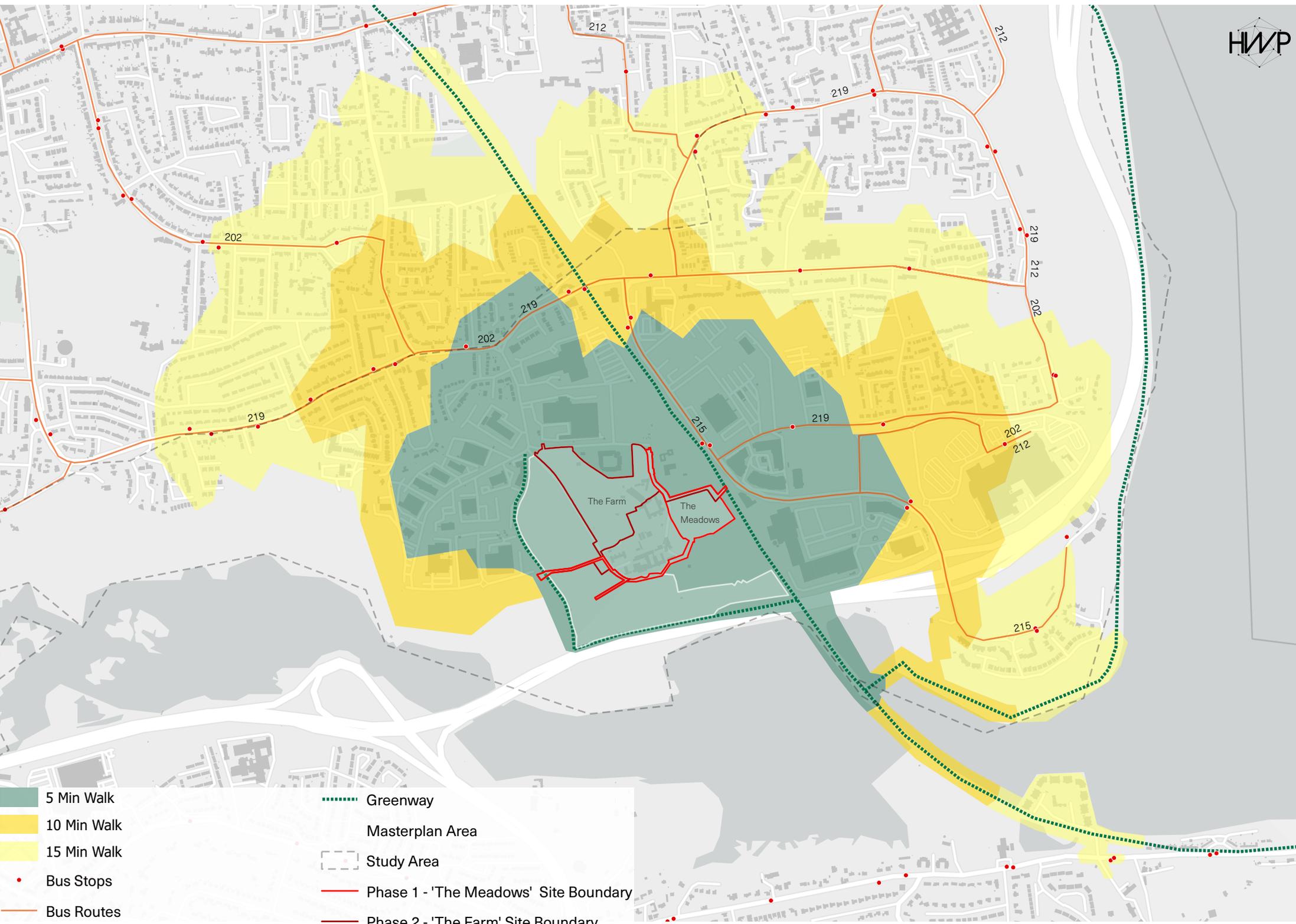
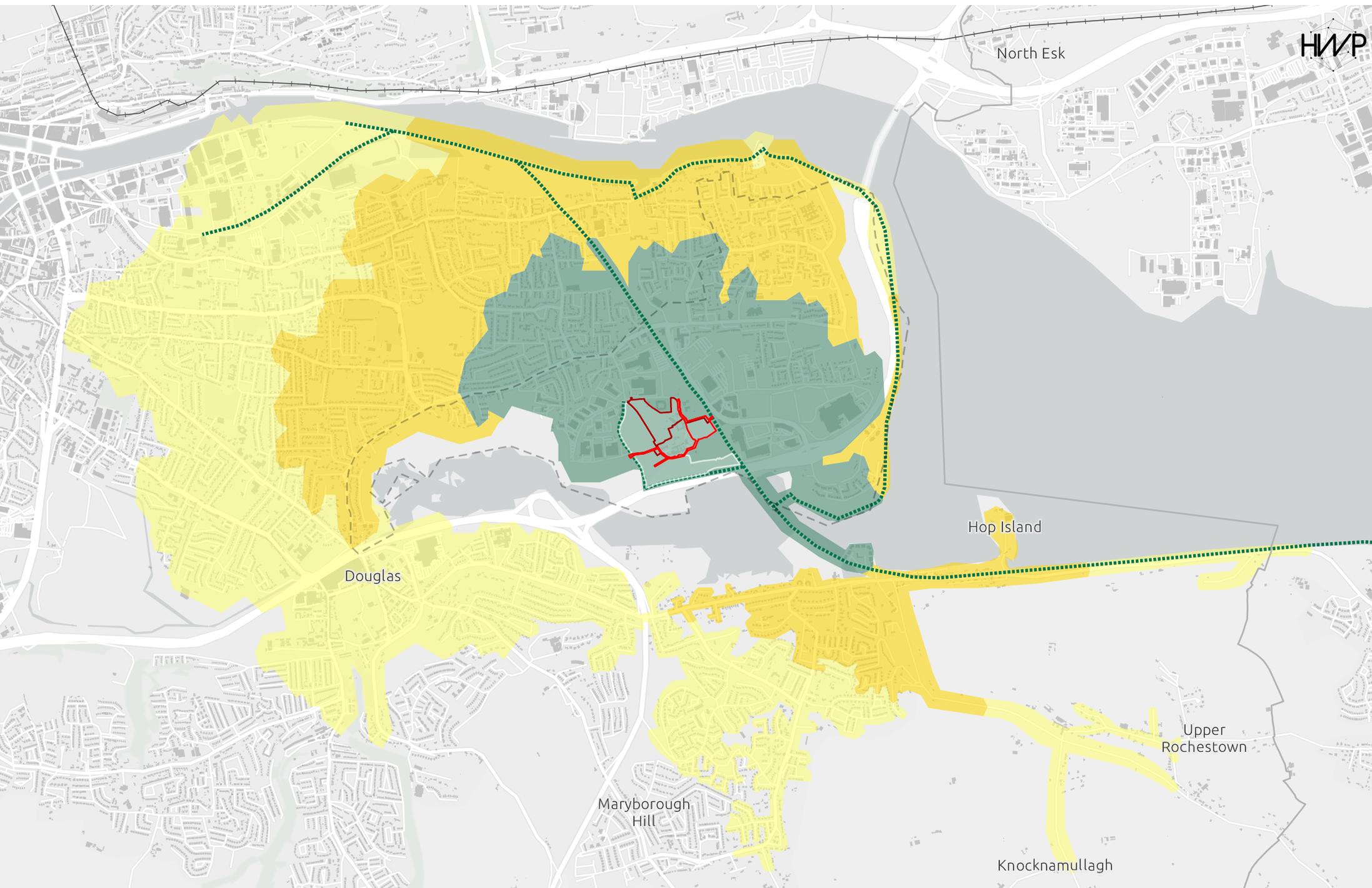


Figure 1: Mahon City Gate Bus Stop Location

Appendix B – Strategic Walking and Cycling Connectivity Mapping



- 5 Min Walk
- 10 Min Walk
- 15 Min Walk
- Bus Stops
- Bus Routes
- Greenway
- Masterplan Area
- Study Area
- Phase 1 - 'The Meadows' Site Boundary
- Phase 2 - 'The Farm' Site Boundary



- 5 Min Cycle
- 10 Min Cycle
- 15 Min Cycle

- Greenway
- Masterplan Area
- Study Area

- Phase 1 - 'The Meadows' Site Boundary
- Phase 2 - 'The Farm' Site Boundary

North Esk

Douglas

Maryborough Hill

Hop Island

Upper Rochestown

Knocknamullagh