

**Proposed Variation No. 5 (Student Accommodation)
to the Cork City Development Plan 2015-2021**

Strategic Environmental Assessment (SEA)
Screening Report

11th April 2018



Comhairle Cathrach Chorcaí
Cork City Council

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Introduction

The purpose of carrying out this screening statement is to consider whether the proposed variation to the City Development Plan 2015 - 2021 requires a Strategic Environment Assessment under the Planning and Development (Strategic Environmental Assessment) Regulations, 2004 as amended.

Section 13(K)(1) of the Regulations states that “*where a Planning Authority proposes to make a variation of a development plan under section 13 of the Act, it shall, before giving notice under section 13(2) of the Act consider whether or not the proposed variation would be likely to have significant effects on the environment, taking into account of relevant criteria set out in Schedule 2A*”.

Where a planning authority considers that there are significant effects on the environment and that there is a prima facie case for SEA, it should proceed to the scoping stage of the SEA. If the planning authority is uncertain as to the need for SEA the designated environmental authorities as set out in section 13A (4) of the Regulations should be formally consulted during the screening process.

Background to Variation

The **Rebuilding Ireland Action Plan for Housing and Homelessness**, published July 2016 sought to address the complex supply and demand issues in the housing crisis. *In Pillar 4: Improve the Rental Sector*, a commitment was made to provide a **National Student Accommodation Strategy (NSAS)** to address the existing shortfall and projected demand for student accommodation. The purpose of the proposed variation is to update the policy on Student Accommodation (PBSA) in the Cork City Development Plan to be in accordance with this new national policy.

Proposed Variation

Cork City Council intends to make a variation to the Cork City Development Plan 2015 - 2021 under Section 13 of the Planning and Development Act, 2004 as amended. The proposed

variation (copy attached) relates to the following material amendments to Volume 1 - Written Statement:

- (a) to insert new supporting text to a new 'Objective 6.5 Student Accommodation' to *Chapter 6 Residential Strategy*, and
- (b) to insert new guidance and development management guidance standards to *Chapter 16 Development Management*

of Volume 1 - Written Statement.

Chapter 6 Residential Strategy

Existing Text:

Objective 6.5 Student Accommodation

Any change of use from student accommodation to any other type of accommodation shall require planning permission. Generally such applications shall be resisted unless it can be adequately demonstrated that an over provision of student accommodation exists in the city.

Proposed Text

Objective 6.5 Student Accommodation

In accordance with the National Student Accommodation Strategy, the City Council will support the provision of high quality and managed, purpose built student accommodation, on campus, in areas in close proximity to Third Level Institutes and in locations within easy access of public transport corridors and cycle routes serving Third Level Institutes.

Proposed Additional Text for Chapter 6:

Student Accommodation

Section 6.15a

In response to housing supply and demand issues, *Rebuilding Ireland, Action Plan for Housing and Homelessness* was published, July 2016. Pillar 4: *Improve the Rental Sector*, made a commitment to provide national policy to address student housing supply and demand issues. The *National Student Accommodation Strategy* was published in July 2017 to inform national policy on increasing the supply of student accommodation. Key targets include a national increase of 7,000 additional Purpose Built Student Accommodation bed spaces by 2019 and a further increase of 21,000 bed spaces by 2024.

There has been a consistent national growth of student population with a projected national increased demand for Student Accommodation until at least 2024. The student population both nationally and in Cork has significantly increased growing from a full time student population of

19,589 in 2006 to 24,750 in 2016 (an increase of 26%). There is currently an undersupply of purpose built student accommodation in the city. The main source of student accommodation in the city is from the private rental sector in housing stock that has become over concentrated in certain areas. The student housing supply model must follow national policy and enable purpose built student accommodation to become a larger supply source for this specialised housing need in Cork Student rental market.

Chapter 16 Development Management

Existing Text:

Student Accommodation

16.68 Given the growth in recent years of the numbers of third level students together with the planned expansion of the city's major educational/facilities, there is a demand for specific residential accommodation to cater for this need. Chapter 6: Residential Strategy outlines the City Council's policy on student housing. When dealing with planning applications for such developments a number of criteria will be taken into account including:

- The location and accessibility to educational facilities and the proximity to existing or planned public transport corridors and cycle routes;
- The potential impact on local residential amenities;
- Adequate amenity areas and open space;
- The level and quality of on-site facilities, including storage facilities, waste management, bicycle facilities, leisure facilities (including shop/café uses), car parking and amenity;
- The architectural quality of the design and also the external layout, with respect to materials, scale, height and relationship to adjacent structures. Internal layouts should take cognisance of the need for flexibility for future possible changes of uses;
- In all schemes the applicants will be required to provide written documentary confirmation for a 'Qualifying Lease' as defined in the Guidelines on Residential Developments for third level students published by the Department of Education and Science in May 1999, to prove that the accommodation is let to students within the academic year.

16.69 As per Objective 6.5 in Chapter 6, all permissions for student housing shall have a condition attached requiring planning permission for change of use from student accommodation to other type of accommodation. Future applications for this type of change of use will be resisted except where it is demonstrated that over-provision of student accommodation exists in the city.

Proposed Text:

Student Accommodation

16.68 The City Council will support the provision of high quality and managed, purpose built student accommodation, on campus, in areas in close proximity to Third Level Institutes and in locations within easy access of public transport corridors and cycle routes serving Third Level Institutes. Chapter 6 Residential Strategy outlines the City Council's policy on student accommodation, referring to the national policy set out in the *National Student Accommodation Strategy*.

When assessing planning applications for such developments, the criteria that will be taken into account include:

- The location and accessibility to Third Level Educational facilities and the proximity to existing or planned public transport corridors and cycle routes;
- The scale of development (capacity) and the potential impact on local residential amenities;
- The provision of amenity areas and open space, (quality and quantity);
- The provision of on-site facilities, including storage facilities, waste management, bicycle facilities, leisure facilities, (retail /café uses), car parking and amenity, (quality and quantity);
- The architectural quality of the design having regard to its context, including scale, height, massing, on-site layout and materials. The internal design and layout should be robust and capable of future adaptation and change of use.
- Include a Management Plan demonstrating how the scheme will be professionally managed and operated 'year round' (term-time and out -of-term periods).
- Demonstrate how the scheme positively integrates with receiving environmental and the local community and creates a positive and safe living environment for students.
- Demonstrate adherence to the Minimum Standards for Purpose Built Student Accommodation as outlined in Table 16a below.

16.69 Student accommodation developments shall only be used for accommodation for students of a tertiary / higher education institute, including residential accommodation that is used as tourist or visitor accommodation only outside of academic term times. Such developments shall not be used as permanent residential accommodation or (subject to the above) as a hotel, hostel, apart-hotel or similar use.

Proposed Table:

Table 16.5a Minimum Standards for Purpose Built Student Accommodation

Description of Development	Minimum Standard (Gross Floor Area)
Shared Unit/house: Minimum 3-bed up to Maximum 8-bed occupancy	55 sq. m.
Single/Double occupancy (self-contained)	

studio unit with ensuite bathroom and kitchenette/cooking facilities	25 sq. m. (min) 35 sq. m. (max)
Campus located townhouse / own-door SA	max of 12 bed spaces per townhouse
Shared kitchen/ living/ dining rooms	4 sq. m. per bed space
Single Study Room (with en-suite shower, toilet and basin)	8 sq. m. (12 sq. m.)
Twin Study Room (with en-suite shower, toilet and basin)	15 sq. m. (18 sq. m.)
Single disabled study bedroom, with en-suite disabled shower, toilet and basin	15 sq. m.
Bathrooms	Either en-suite with study bedrooms/ studio units or to serve a maximum of 3 bed spaces
Car Parking	As per Table 16.8
Cycle Parking Standards	As per Table 16.9
Communal private open Space	5-7 sq. m. per bed space

Screening Report

This section assesses the likelihood of significant effects to the environment as a result of implementing the proposed variation to the Cork City Development Plan 2015 - 2021 taking account of the criteria set out in Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations, 2004.

1. The characteristics of the plan or programme, or modification to a plan or programme, having regard, in particular, to

(a) the degree to which the plan or programme, or modification to a plan or programme, sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.

The proposed variation to the Cork City Council Development Plan 2015 - 2021 does not set a framework for projects and other activities, but enables the Planning Authority to provide updated planning policy and development management standards for future planning applications for Student Accommodation.

(b) the degree to which the plan or programme, or modification to a plan or programme, influences other plans including those in a hierarchy,

The proposed variation does not propose any changes which conflict with the National Spatial Strategy, Cork Area Strategic Plan, the Regional Planning Guidelines or the Joint Housing Strategy for Cork Planning Authorities 2014.

(c) the relevance of the plan or programme, or modification to a plan or programme, for the integration of environmental considerations in particular with a view to promoting sustainable development,

The proposed variation has been prepared under the Planning & Development Acts 2000(as amended).

(d) environmental problems relevant to the plan or programme, or modification to a plan or programme,

There are no significant environmental problems to the plan or programme resulting from the proposed variation. The provision of updated planning policy and development management standards for future planning applications for Student Accommodation will not result in any adverse environmental impact as all development will be assessed in terms of surface water discharge as part of the design process of any future scheme.

(e) the relevance of the plan or programme, or modification to a plan or programme, for the implementation of European Union legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

There is no relevance of the proposed variation in relation to the implementation of European Legislation.

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

(a) the probability, duration, frequency and reversibility of the effects,

It is considered that the proposed variation will not have any significant effects.

Subject to the location of the site, flood risk assessment, surface water discharge proposal from each site shall be assessed and managed in accordance by appropriate attenuation measures such as sustainable urban drainage systems, in order to mitigate potential flooding/ stormwater issues downstream.

It is important to note that this report does not purport to address all possible environmental issues for each site, all potential impacts on the local environment will be addressed in any future planning application and assessment process.

(b) the cumulative nature of the effects,

It is considered that there will not be any cumulative effects resulting from the proposed variation.

(c) the transboundary nature of the effects,

It is considered that there will be no transboundary effect resulting from the proposed variation.

(d) the risks to human health or the environment (e.g. due to accidents),

It is considered that the proposed variation will not create any direct risks to human health or the environment.

(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),

The proposed variation does not alter the quantum / densities of residential development or population increase over and above that prescribed in the 'Core Strategy' of the City Development Plan 2015 - 2021. The absolute number of persons who will be affected by the variation in the City areas is not known at this time.

(f) the value and vulnerability of the area likely to be affected due to:

(i) special natural characteristics or cultural heritage,

Any adverse impacts will be mitigated through the development management process following adherence to the overriding policies and objectives contained in the City Development Plan.

(ii) exceeded environmental quality standards or limit values,

The variation will not affect environmental quality standards or limit values

(iii) intensive land-use,

The proposed variation does not in itself represent an intensification of land-use.

(f) the effects on areas or landscapes which have a recognised national, European Union or international protection status.

The proposed variation is not 'site specific' but covers all 'land-use zoning objectives' where residential use is permitted, which in turn are not subject of any recognised national, European Union or international protection status, and therefore the variation is unlikely to have any effect on any such designated areas or landscapes.

Conclusion

The changes proposed in the variation are set within the context of a development framework already established by the adopted Cork City Development Plan 2015 - 2021.

The impact of the implementation of the variation in terms of the environment and sustainable development is likely to be **neutral** from a strategic perspective. Therefore, it does not appear that there is a need for a SEA in this instance as the proposed variation is unlikely to result in development which would have significant effects on the environment.

It is therefore recommended that Cork City Council does not proceed to SEA scoping in this case.

Gwen Jordan McGee
Executive Planner

Appendix A

Flood Risk Assessment

Proposed Variation No. 5 (Student Accommodation) to the Cork City Development Plan 2015 - 2021.

The Planning System and Flood Risk Management Guidelines for Planning Authorities, November 2009. DEHLG & OPW

The Guidelines advocate a *sequential approach* that is:

Avoid or choose lower risk flood zones for new development;

Substitute or ensure type of development is not especially vulnerable to adverse impacts of flooding;

Justify, ensure the development is strategic;

Mitigate, ensure flood risk is reduced to acceptable levels; i.e. prepare detailed proposals for surface water management

Proceed where justification test is passed.

The *sequential approach* requires that mitigation measures such as surface water management proposals are prepared as part of a decision to grant permission.

Flood Risk Assessment

The proposed variation is not site-specific. The adopted City Development Plan has been subject to a strategic flood risk assessment as part of the SEA process.

Conclusion

There are no flood risk implications on foot of the proposed variation.

Gwen Jordan McGee

Executive Planner



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