



**COAKLEY O'NEILL**  
town planning

## **PLANNING REPORT AND STATEMENT OF CONSISTENCY**

# Proposed Strategic Housing Development, Monacnapa, Blarney, Cork

Prepared in February, 2022 on behalf of

**Eoin Sheehan**

Coakley O'Neill Town Planning Ltd.

## Document Control Sheet

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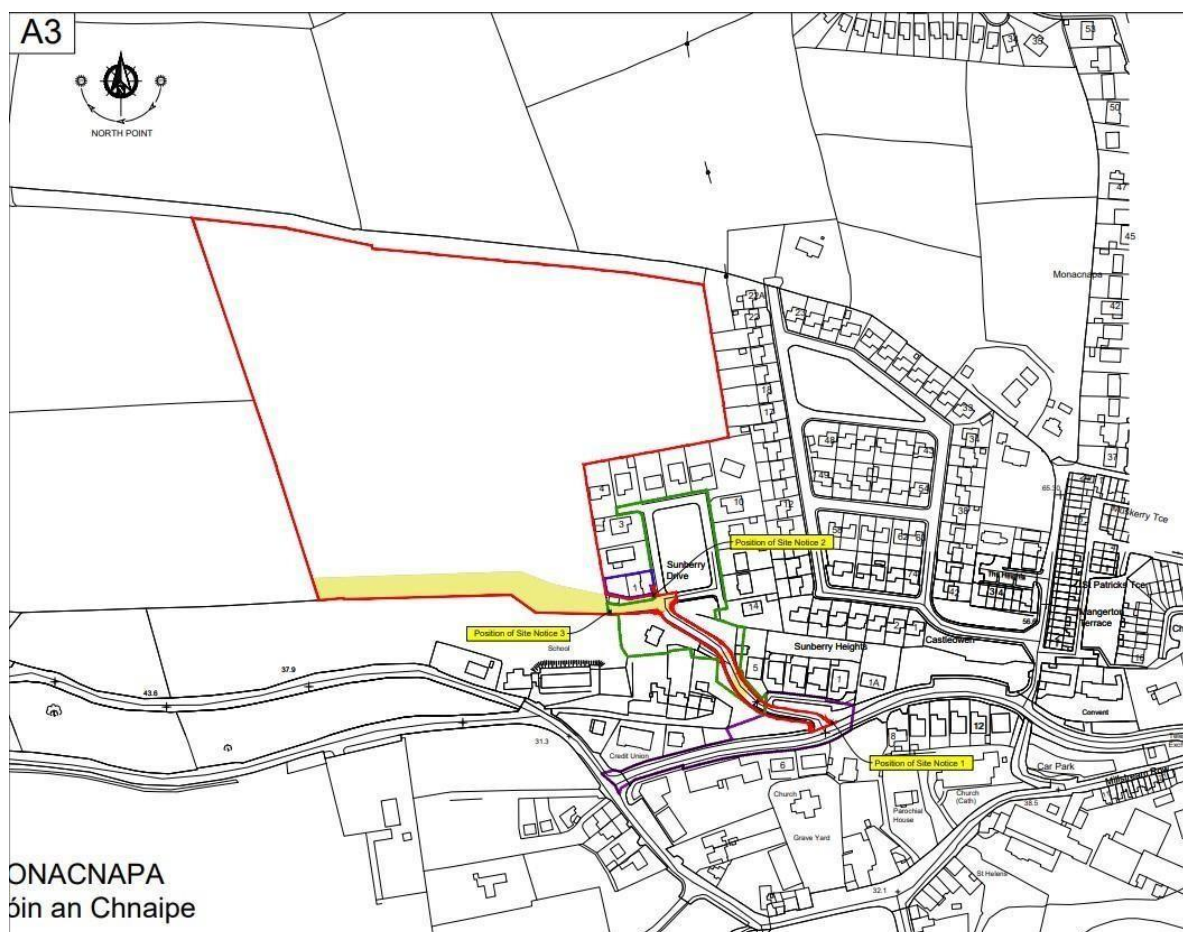
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## 1.0 INTRODUCTION

1.1 We, Coakley O'Neill Town Planning Ltd, NSC Campus, Mahon, Co. Cork, have been instructed by Eoin Sheehan to prepare this Planning Report and Statement of Consistency, for submission to An Bord Pleanála in respect of a proposed a Strategic Housing Development, as enacted under the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, at Monacnapa, Blarney, Cork.

## 2.0 SITE CONTEXT AND DESCRIPTION

2.1 The proposed development site is c. 7.79 ha in total, located within the development boundary of the Metropolitan Town of Blarney, in the expanded Cork City.



**Figure 1 Proposed Development Site**

- 2.2 Blarney Town Centre is located c. 0.6km to the south of the site. To the east and south-east of the site are established residential areas. North and west of the site is agricultural land and to the south a wooded escarpment separates the site from the R617, with Scoil Chroí Íosa an Bhlárna further south.
- 2.3 A residential access road, Sunberry Heights, which serves a total of c. 7no. dwellings, leads northwest from the R617 (Blarney Relief Road) to Sunberry Drive. Sunberry Drive comprises c. 14no. detached dormer houses and bungalows on individual sites. Access to the proposed development site is via Sunberry Heights and an existing field access adjacent to the south-western most house in Sunberry Drive (no. 1),

which is also in the ownership of the applicant.

- 2.4 The proposed development site is in rough pasture and grain cropping, and slopes in a southerly direction. In the field beyond the northern boundary is the peak of a hill called Knockacorbally. The eastern boundary of the site fronts onto the rear gardens of houses 1-9 Sunberry Drive and 16-22A Castlelowen. The northern, western and southern boundaries of the subject site have significant trees.
- 2.5 The applicant is the principal owner of the proposed development site. Cork City Council is the owner of the lower section of the Sunberry Heights/Sunberry Drive access road and its junction with the R617 (Blarney Relief Road). The applicant has an easement over the remaining section of the Sunberry Heights/Sunberry Drive access road to the entrance to the proposed development site, as confirmed by reference to the legal opinion included with the application. ESB Networks own the existing substation at the entrance to the proposed development and has agreed to engage with the applicant regarding the potential relocation of the substation in the event of a grant of planning permission.



**Plate 1 Existing Access to subject site via Sunberry Drive**



**Plate 2 View of site from the south east**



**Plate 3 Eastern boundary of the proposed development site showing rear gardens of no. 1-4 Sunberry Drive**



**Plate 4 Sunberry Drive**



**Plate 5 National School and the woodland that separates it from the proposed development site**



**Plate 6 View of Subject Site from north-west**

### 3.0 PLANNING HISTORY

3.1 The subject site has previously been subject to 3no. planning applications.

3.1.1 **Planning Register Reference ABP-308156-20:** SHD application for 150no.units and a creche was refused by An Bord Pleanála on 18<sup>th</sup> December, 2020 for the following reason:

*The proposal for the construction of 150 number residential units, on lands zoned Medium B Density Residential Development in the Blarney Macroom Municipal District Local Area Plan 2017, materially contravenes zoning objective BL-R-03, that states Medium B Density Residential Development including detached dwellings, limited to the lower portion of the site. The proposed development includes a residential density in excess of that planned for on the lower portion of the site which has been reserved for a residential density range of between 12-25 units per hectare in the adopted land use zoning objective. It is considered that the inclusion of a residential density of 36.6 units per hectare, within an area of land for which the residential density range is 12-25 units per hectare, would be contrary to the Local Area Plan and not be in accordance with section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, which is required to be included in the public notice at application stage, therefore, the Board is precluded from granting permission for the proposed development.*

3.1.2 The findings of the Inspector's report dated 9<sup>th</sup> December, 2020, provide the context for the proposed development as follows:

- (a) The proposed development aligns with the core strategy of the relevant plan (section 10.2.2)
- (b) Blarney is listed as a location where higher densities could be sustained, especially sites close to high quality



- public transport proposals (section 10.2.3)
- (c) The level of density proposed is in accordance with the density ranges advised by section 6.11 *Edge of centre sites* (20-35 dwellings per hectare) of the Guidelines on Sustainable Residential in Urban Areas (section 10.2.13)
  - (d) The design, form and residential densities proposed may be entirely acceptable at this location and in accordance with national guidelines (section 10.2.14)
  - (e) The proposed dwelling houses are acceptable and will provide a good level of residential amenity to future occupants (section 10.3.3)
  - (f) The location and layout of the duplex apartment blocks is broadly satisfactory (section 10.3.6)
  - (g) No amount of excessive overlooking, the proposed development is not overbearing, and no overshadowing is expected in respect of Sunberry Drive, subject to the removal of 3no. units (section 10.3.10). There will be no loss of amenity to residents in Castleowen (section 10.3.14). The proposed development has been designed to preserve the residential amenities of nearby houses in the area as well as those houses within Sunberry Drive and Castleowen housing estates (section 10.3.15)
  - (h) The matter of visual impact has been well addressed in all documentation within the application file. I do not underplay the importance of Blarney Castle in the context of the heritage and tourism value of the overall town. I accept that the historical conception of the town, its layout and wider planned landscape are important. I note that the Architectural Conservation Area for the town is extensive and includes the built heritage of the town, the valley floor around the castle but not the wider valley and planted woodlands or the subject site itself. I accept that the wider historic woodland planting and productive farmland has a part to play in the setting of the castle and town. However, I do not accept that the proposed development either by design or quantum necessarily or negatively impacts the wider landscape. Specifically, I note that the current proposal for the site, in accordance with the LAP objective for the site, retains the upper portions of the lands free from development (section 10.4.3)
  - (i) I see nothing especially out of place in the proposed development, located on lands zoned for development, that would cause a significant visual impact and so I see no reason to refuse permission on these grounds (section 10.4.5)
  - (j) Ecology aspects have been suitably addressed (section 10.4.7)
  - (k) In broad terms the quantum and approach to public open space is good (section 10.5.1)
  - (l) The design and layout of the scheme is acceptable and an appropriate design response to the challenging typography on this zoned site, together with the landscaping measures proposed are sufficient to provide for a sense of place, with variety and distinctiveness (section 10.5.4)
  - (m) The internal road hierarchy is adequate, and the provision of shared surfaces welcome (section 10.5.5)
  - (n) Issues arising from traffic hazard are not so significant or irreversible to warrant a refusal of permission (section 10.6.8)
  - (o) It is a relatively modest development, located on the edge of an existing estate and within the 50kph zone...as an urban area, some level of congestion is anticipated (section 10.6.11)
  - (p) Car parking and cycle parking is acceptable (sections 10.6.12 and 10.6.13)
  - (q) Irish Water raise no particular issues (section 10.7.1)
  - (r) The overall surface water regime is supported (section 10.7.5)
  - (s) EIA and Appropriate Assessment are not required (sections 11.0 and 12.0)

3.1.3 **Planning Register Reference 10/8260:** Withdrawn application for the demolition of the existing shed and construction of 106no. dwellings, bin stores, 1 no. crèche, new vehicular access, parking, etc. This application

proposed to address surface water drainage by means of an infiltration pond, attenuation tank and swales. A Request for Further Information (RFI) issued on 10th December 2010 sought the following items, which are of relevance to the development potential of the site:

- *Revised layout omitting dwellings on or above the 72m contour line, necessitating a comprehensive redesign of the layout;*
- *Visual impact assessment of the proposed development relative to Blarney Castle the Scenic Route and the scenic landscape designation;*
- *Boundary treatments;*
- *Stage 1/2 Road Safety Audit, including an assessment of the adequacy of the Sunberry Estate Road and its junction with the Blarney Relief Road;*
- *Detailed proposals for the upgrading of the access to cater for additional traffic and pedestrian volumes, including upgrading of the junction onto the R617; upgrading the sections of the existing estate road with Sunberry Heights to 6m with a 2m footpath on the southside, and safety railings/barrier and lighting along this footpath;*
- *Full details of the access from Sunberry Drive, including interaction with existing properties to the north and south, and requirement for sight lines (70m in each direction);*
- *Concerns regarding the location and viability of the proposed infiltration and attenuation system (located to the south of the proposed development). A revised system is required which incorporates attenuation tanks and a controlled outfall/discharge to a suitable drainage system/watercourse. The adequacy of the proposed swales should be reviewed;*
- *A survey of the existing storm water sewer at Sunberry Heights to determine capacity and condition – which may require upgrading of the existing system;*
- *Water supply not adequate- connection required to the 200mm water main from Knockacorbally to the north of the site and connecting to the 100mm water main in Sunberry Estate.*
- *Capacity and condition of the 160mm foul sewer serving Sunberry is required.*

3.1.4 **Planning Register Reference PL04.234024/ 08/9047:** Planning permission was refused by An Bord Pleanála for the demolition of an existing shed & construction of 133 no. dwellings (13 with external stores), bin stores, 1no. crèche, new vehicular access, all associated car parking, all ancillary landscaping & site development works including 2no. attenuation tanks, on 24<sup>th</sup> November 2009. The reasons for refusal are as follows:

1. *The site is zoned for medium density residential development limited to the lower portion of the site with the upper part of the site to be retained as open space in the Blarney/Kilbarry Local Area Plan 2005 and is part of the designated scenic landscape in the Cork County Development Plan 2009. The proposed development includes a significant number of houses on the upper part of the site which has been reserved for open space in the adopted land use zoning objective. The proposed development would, therefore, materially contravene the zoning objective for the site, would be visually obtrusive, in particular from views from Blarney Castle, a significant tourist attraction, and would be contrary to the proper planning and sustainable development of the area.*
2. *The Board is not satisfied that surface water arising within the proposed development would be adequately dealt with on site or safely discharged to the adjoining surface drainage system, and not add to or exacerbate flooding in the vicinity and downstream of the site.*

3.2 In terms of recent planning history in the vicinity of the subject site, the following is of note.

3.2.1 **Planning Register Reference PL 04.248614/1607122:** Planning Permission was granted by An Bord Pleanála on 22<sup>nd</sup> November 2017 for the demolition of existing dwelling house and construction of 78 no. residential units, a crèche and all ancillary site development works including parking, footpaths, foul and storm water drainage (including the provision of a surface water attenuation tank), landscaping and amenity areas. The development includes the creation of a new vehicular entrance along the sites north-eastern boundary from the Monacnappa Estate and a new pedestrian/cyclist entrance along the site's southern boundary from Mangerton Terrace. The Board considered that having regard to the pattern of the development in the area and the available road, water and wastewater infrastructure, the proposed development represented an appropriate form of development on residentially zoned and serviced lands in close proximity to the village core of Blarney and is satisfied that the proposed access arrangements are appropriate. Furthermore, the Board concurred with the planning authority and considered that, based on the separation distances and the scale and height of the proposed units, the proposed scheme would not result in an overbearing impact on adjoining properties and would, therefore, be in accordance with the proper planning and sustainable development of the area.

3.2.2 **Planning Register Reference ABP-309152-21/2039597:** Planning Permission was granted by An Bord Pleanála on 14<sup>th</sup> December, 2021 for a mixed use development (hotel (3-4 storeys); supermarket (1-2 storeys); café (2 storey); office (1-2 storeys); commercial building (1-2 storeys); 70no. residential units (2-4 storeys) at the site of the former Blarney Park Hotel and Leisure Centre, St. Ann's Road, Monacnappa, Blarney, Cork. An application for leave to Judicially Review this decision was submitted on 10<sup>th</sup> February, 2022 (ref. 2022/111 JR).

3.2.3 **Planning Register Reference ABP-308670-20/2039502:** Planning Permission was granted by An Bord Pleanála on 23<sup>rd</sup> December, 2021 for a three-storey primary care centre at St. Ann's Road, Monacnappa, Blarney, Co. Cork.

3.2.4 In making its decision in both cases cited in 3.2.2. and 3.2.3 above, the Board had regard to:

- The location of the site in an established urban area
- National, regional and local planning policy provisions, including the importance of compact growth
- The nature, scale and design of the proposed development and the existing availability in the area of a wide range of social, transport and water services infrastructure,
- The pattern of existing and permitted development in the area
- Critically, the permitted development would not seriously injure the character of the nearby Blarney Architectural Conservation Area, and that, in the context of policy objective GO-06 which requires that development does not compromise the landscape and heritage character of the area, the proposed development was not in material contravention of the local plan and would not compromise the landscape and heritage character of the area.

## 4.0 PRE-PLANNING CONSULTATION

### 4.1 Section 247 Consultation

4.1.1 The proposed development was subject to a S247 pre-application consultation with Cork City Council on 17<sup>th</sup> February, 2021. A copy of the minutes of this meeting are attached at Appendix 1 to this report. The key issues raised, and our response to same, are set out below:

Issue	Comment	Response
Planning Policy/ Development Management	The proposed development materially contravenes the land use zoning.	It is acknowledged that the proposed development materially contravenes the specific BL-R-03 land use zoning objective in respect of the application of the Medium B density to the lower portion of the site. However, it is considered that the application of 35 units/ha to the lower portion of the site is fully justified having regard to national, regional and local policy for Blarney, and the fact that the site is within walking distance of a high quality public transport route with a half hourly bus service to the City Centre and Mahon, which, has capacity (Bus Service/Bus Capacity Assessment prepared by NRB enclosed with this application). A Statement of Material Contravention is included.
	The land-use zoning is considered reasonable.	The residential land use zoning objective limited to the lower portion of the site is considered reasonable. The Medium B density is not considered reasonable given the fact that these lands are zoned and serviceable and located within walking distance of a City bus route, as well as existing amenities in Blarney.
	The proposed density is too high and in contravention of the zoning.	As above

	<p>The site is highly constrained due to its topography and limitations around access. Permeability and connectivity with the town centre is poor.</p>	<p>The topography of the site is not unusual in a Cork context. The Council and the Board on appeal (PL 04.248614/1607122) has permitted residential development at a more challenging topography at Cluain Ard (under construction) to the north-east of the proposed development site. The proposed development site benefits from an existing access which is to be upgraded as part of the proposed development. This access road connects directly with existing footpath and pedestrian crossings to the town's amenities.</p>
	<p>There is a contour above historic tree-line to the south of the site, and there is an established tree-line along western boundary. These should be respected, and structures set back accordingly.</p>	<p>The proposed development provides for adequate separation from existing boundaries.</p>
	<p>The sites zoning is currently Medium B and as such entertaining a higher density is premature pending the outcome of CMATs proposals, in essence whether Blarney gets a high frequency bus service or not will determine if the site is Tier 1 or Tier 2. The de-zoning of the site is not envisaged but its short term developability is still unclear. If the current frequencies are not improved dramatically then the opportunity of Modal Shift in Blarney will not arise. This is particularly pertinent to this site if they are relying on PT to reduce parking provision,</p>	<p>The proposed development site is already served by a half-hourly bus route to the City Centre and Mahon, which has capacity. It is therefore not premature pending the implementation of CMATs proposals.</p> <p>The report of the Inspector on the previous SHD application for this site, ABP-308156-20, noted that <i>Blarney is listed as a location where higher densities could be sustained, especially sites close to high quality public transport proposals (section 10.2.3)</i></p> <p>The proposed development will assist in making the case for</p>

	without PT improvements a necessity for increased parking will arise.	further investment in the town's public transport infrastructure as envisaged in CMATs.
	There is no permeability proposed to the town centre, schools or neighbouring estates, the statement of consistency makes no reference to the Permeability Best Practice Guidelines.	The proposed development includes an upgrade to the existing access road and 1.2m wide footpath, to include: a Speed Reduction Table at the mid-point on the estate road, to reduce speed on the existing estate road; a raised platform at the junction with the R617, to improve the safety of the junction for all road users and pedestrians; the existing carriageway will be designated as a shared street in accordance with the National Cycle Manual with new road markings laid down on the carriageway as required; the existing estate road carriageway will be overlaid with a high friction surfacing, which, coupled with ongoing maintenance including gritting and salting of the roads during poor weather conditions, will improve the overall safety of the estate road. The access road already connects to the existing footpath infrastructure in the vicinity, ensuring that future residents will be able to access the town's amenities on foot and by cycle.
	The layout is somewhat monolithic is not sympathetic to the topography of the site, how each of the character areas relate to each other is unclear. The positioning of gables overlooking the roads and open space is unacceptable, a more sensitive treatment of corners is needed to	This contradicts the opinion of the Inspector on the previous SHD application for this site, ABP-308156-20, who stated that <i>the design and layout of the scheme is acceptable and an appropriate design response to the challenging topography on this zoned site, together with the landscaping</i>

	allow for a more calming effect on the roads and better supervision of open space.	<i>measures proposed are sufficient to provide for a sense of place, with variety and distinctiveness (section 10.5.4). The same Inspector also commented that In broad terms the quantum and approach to public open space is good (section 10.5.1)</i>
	The position of the apartments is questionable and the amenities of these is again questionable.	This contradicts the opinion of the Inspector on the previous SHD application for this site, ABP-308156-20, who stated that, in relation to the apartment blocks, <i>the location and layout of the duplex apartment blocks is broadly satisfactory (section 10.3.6)</i>
	Blarney although under the jurisdiction of Cork City Council cannot really be considered Cork City, it is a distinct CSO settlement and therefore different criteria apply, notably NPO 3(c) of the NPF	Blarney is located within the expanded boundary of Cork City and is identified as an Urban Town within the City in the draft Cork City Development Plan 2022-2018, and the proposed development site is identified as a Tier 1 residentially zoned site capable of up to 50 units per hectare in buildings of up to 3 storeys. In relation to NPO3(c) of the NPF, the requirement is to deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints, The proposed development of new homes on a site located within the existing development boundary of Blarney complies with NPO 3(c) of the NPF. The defined urban area of Blarney includes the proposed development site.
Drainage	There should be a survey of the drainage route from the site	OLS has engaged the services of Irish Hydrodata Ltd to undertake

	<p>boundary through third party lands, and down through the various culverted sections under the Kilowen Road and the R617 (St. Ann's Road). Previous observations have indicated that the applicant's site does not have connectivity to the drainage through the third party lands as indicated at the south-west corner of the site. This has serious implications for the viability of the drainage proposals and must be clarified before the design can progress any further. There are also concerns about the elevation drop through these lands and the potential flow velocities and associated scouring that could occur...the Applicant shall address this also.</p>	<p>a modelling assessment of the pre and post development scenarios on the existing stream and ancillary culverted crossings. The proposed development will give a 16% (19.2 litres/second) increase in the 1/100 year-rainfall event. Irish Hydrodata conclude that the post development flow of 142litres/second is well below the culvert capabilities, and therefore there will be no negative impact on the existing watercourse and associated road crossings which are deemed to have sufficient capacity. Following consultation with Cork City Council on the surface water pathway, the following actions were taken to demonstrate connectivity:</p> <ul style="list-style-type: none"> <li>• The culverted road crossing on the R617 Tower Road was visually inspected by OLS Consulting Engineers on Tuesday 23rd November 2021. The crossing comprised of a 600mm diameter concrete pipe which was clearly visible on the upstream side of the crossing.</li> <li>• The crossing was dye traced on the day of the inspection and the outlet was located south of the R617 Tower Road where it discharges to an open watercourse which runs in a southerly direction from the R617 Tower Road. The 600mm diameter pipe was found to be heavily silted on the day of inspection and in need of cleaning.</li> <li>• The dye tracing confirmed</li> </ul>
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		<p>that the open land drain which descends through the woodland crossing the Killowen Road initially and subsequently the R617 Tower Road does connect to the open watercourse to the south of the R617 Tower Road which ultimately discharges to the River Martin.</p> <ul style="list-style-type: none"> <li>• The matter of the condition of the culverted road crossing on the R617 Tower Road was subsequently discussed with Mr. Simon Lyons of the Water and Drainage Services Department of Cork City Council. It was agreed that that piped crossing will need to be cleaned and CCTV surveyed to ascertain the condition of the pipe. Cork City Council intend to undertake the cleaning and CCTV works in due course, however, Mr. Simon Lyons has indicated that the Planning Application may be lodged on the basis that connectivity has been demonstrated.</li> <li>• Following the undertaking of the CCTV works on the piped crossing and at the point where the condition of the piped crossing has been established, it has been agreed that should remedial works be required to ensure the piped crossing is fit for purpose, the applicant shall enter into an agreement with Cork City Council to pay a</li> </ul>
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		<p>contribution towards any remedial works to the crossing proportionate to the quantity of surface water discharging through the piped crossing from the proposed development.</p> <ul style="list-style-type: none"> <li>• For the purposes of this application and predominantly from an environmental perspective, a "worst case" approach has been considered in respect of the necessary remedial works. From an environmental perspective, it has been assumed that the road crossing may have to be replaced in its entirety and all environmental assessment and reporting is based on this "worst case" scenario although it is not envisaged that such extensive remedial works will be required. The following is an outline scope of the works required to replace the crossing in its entirety:             <ul style="list-style-type: none"> <li>• Implement Traffic Management appropriate to the task and scope of the works in hand - this may necessitate a temporary road closure depending on how the contractor plans to undertake the works.</li> <li>• Retain the existing culvert in operation for the duration of the laying of the new culvert crossing to prevent unnecessary</li> </ul> </li> </ul>
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		<p>contamination of surface water.</p> <ul style="list-style-type: none"> <li>• Saw cut existing road surfacing, excavate trenching for new precast pipe and dispose of all waste materials to appropriate licensed facilities by licensed contractors.</li> <li>• Lay new 600mm Precast Pipe Crossing, backfill with suitable fill material.</li> <li>• Install new head wall at pipe outfall location.</li> <li>• Divert surface water flow to new culvert and make good to inlet screen upstream of culvert.</li> <li>• Decommission/remove old pipework.</li> <li>• Backfill/reinstate road crossing in preparation for laying road surfacing.</li> <li>• Lay road surfacing to match existing, seal all joints.</li> <li>• Reinstate public footpath, hedgerows and existing boundaries.</li> <li>• Reinstate road markings and signage where affected.</li> <li>• Stand down traffic management procedures.</li> </ul>
	<p>We will require an estimate of the volumes of intercepted storm water run-off entering the site's network, coming via overland flow from the land to the north. The Applicant previously identified a cut off drain here, but the estimate of run-off quantities that will ultimately reach the site</p>	<p>Estimated volumes of existing surface water are presented in Table 3.5 of the Engineering Services Report prepared by OLS Consulting Engineering on foot of the modelling assessment undertaken by Irish Hydrodata Ltd.</p>

	network and hence be discharged via the outfall mentioned in Item 1 above needs to be provided.	
	There is a large amount of cutting and filling. We will require much more site investigation to identify groundwater table levels and potential impacts on that. Prior to submission of the application the Applicant will need to complete trial pits and boreholes throughout the site and where groundwater is discovered, an assessment of the likely seepage that will occur and hence enter the storm water system will be required	Section 7 of the Engineering Services Report prepared by OLS Consulting Engineering provides details of the Site Investigation works which were carried out by Priority Geotechnical in March and May, 2021 and associated assessment. No groundwater was encountered within the boreholes or trial excavations. An overview assessment of the extent of cut and fill needed to construct the proposed development is summarised in Table 7.1 of the Engineering Services Report. Essentially, the cut fill difference is +33,499.00m <sup>3</sup> . This material will be disposed of off-site to a licensed facility by a licensed haulage contractor.
	The application will also need to identify how seepage will be managed as it interacts with retaining structures (i.e. back of wall drainage) and embankments (i.e. cut-off drain/filter drain at the embankment toe).	The interceptor drains shall be installed to the rear of all retaining wall structures to intercept any seepage that may arise from behind the retaining walls. Similarly where open embankments are proposed, interceptor french drain shall be installed at the embankment toe to capture any runoff or seepage occurring with the vicinity of the embankment or cutting.
	There was no SuDs proposals submitted first time round...a site of this nature needs to consider a SuDS based approach	A SuDS Strategy Report has been prepared by OLS Consulting Engineers and accompanies the planning application. Surface water is proposed to be attenuated in three zones within the site and surface water is released to outfall at a rate equal to the

		calculated greenfield runoff rate for the site. The attenuation proposals are designed in accordance contained in the CIRIA SuDS Manual 2015.
Parks	Refer to previous assessment in recent SHD application. General scheme is acceptable.	The acceptability of the public open space proposals by the Parks Department is welcome, and is consistent with the opinion of the Inspector on the previous SHD application for this site, ABP-308156-20, who commented that <i>In broad terms the quantum and approach to public open space is good (section 10.5.1)</i>
Conservation	Refer to previous assessment in recent SHD application	Noting the concerns raised by the Conservation Officer in respect of views from the Castle and on the relationship with the western and southern boundaries, the opinion of the Inspector on the previous SHD application for this site, ABP-308156-20, is noted. He states that <i>the matter of visual impact has been well addressed in all documentation within the application file. I do not underplay the importance of Blarney Castle in the context of the heritage and tourism value of the overall town. I accept that the historical conception of the town, its layout and wider planned landscape are important. I note that the Architectural Conservation Area for the town is extensive and includes the built heritage of the town, the valley floor around the castle but not the wider valley and planted woodlands or the subject site itself. I accept that the wider historic woodland planting and</i>

		<p><i>productive farmland has a part to play in the setting of the castle and town. However, I do not accept that the proposed development either by design or quantum necessarily impacts the wider landscape. Specifically, I note that the current proposal for the site, in accordance with the LAP objective for the site, retains the upper portions of the lands free from development (section 10.4.3).</i></p> <p><i>The Inspector also states: I see noting especially out of place in the proposed development, located on lands zoned for development, that would cause a significant visual impact and so I see no reason to refuse permission on these grounds (section 10.4.5).</i></p> <p><i>It is also noted in the Landscape Visual Impact Assessment (LVIA) prepared by CSR that accompanies this application that The visual effect of the proposed development on Blarney Castle is considered Moderate, and the quality of the effect is Neutral. While the upper part of some of the proposed house elevations and some roof structures will be visible, the development will be well integrated in the hillside setting. Integration will be enhanced as the proposed tree planting programme for the site matures. This includes tree planting along the northern edge of the proposed development footprint.</i></p> <p><i>Specifically with regard to Objective GO-06 of the Blarney</i></p>
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		<p>Macroon LAP which states 'Ensure adequate regard is given to assessing the visual impacts of new developments in close proximity to Blarney Castle and Estate so as to ensure that such developments do not compromise the landscape heritage character of the area', the LVIA states that the design strategy for the site includes the following key elements:</p> <ul style="list-style-type: none"> <li>• Exclusion of development from the upper part of the site.</li> <li>• Retention of site boundary vegetation and avoidance of impacts on trees along site boundaries.</li> <li>• Cut and fill operations to optimise integration of the proposed development in the hillside setting.</li> <li>• Provision of short, medium and long-term remedial mitigation measures in the form of tree planting across the site, on open spaces, along streets, within gardens and along embankments arising from cut and fill operations.</li> </ul> <p>The planting will supplement existing green infrastructure in providing a natural framework within which the development will be integrated as it matures. In this respect the proposed development is consistent with objective GO-06 of the LAP. It is also noted that in determining applications for the primary care centre and a mixed-use development described in</p>
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		<p>section 1.6.3 Cumulative Effects, An Bord Pleanála specifically determined that they would not compromise the landscape and heritage character of the area in respect of objective GO-06.</p> <p>Furthermore, the Archaeological Assessment prepared by John Cronin &amp; Associates states as follows:</p> <p><i>This assessment concurs with the findings of the LVIA that the proposed development will not compromise the Blarney Architectural Conservation Area or the landscape and heritage character of the area on which the local tourism economy relies, particularly in respect of Blarney Castle and the wider Blarney Estate as per planning guidance set out under 3.2.23 and 3.2.24 of the Blarney Macroom Municipal District Local Area Plan</i></p>
<p>Traffic, Movement and Accessibility</p>	<p>Most points were raised in previous traffic reports in recent SHD application previously and should also include the following:</p> <ul style="list-style-type: none"> <li>• The TTA needs to be more robust and in line with the TII guidelines especially in terms of validating the trip rates used against existing similar developments /sensitivity analysis etc</li> <li>• TTA needs to include an opening year +5 yr forecast in line with TII guidelines</li> <li>• Modal</li> </ul>	<p>The TTA has been prepared in accordance with the TTA Guidelines, which recommends the use of licensed TRICS software to establish Trip Patterns, when using the 'predict and provide' methodology of assessment. The industry standard assessment has been utilised. The TRICS traffic generation comparison data included within Appendix B of the TTA includes several Irish Housing Sites. Notwithstanding the clearly comparable data used, the resulting increases in traffic associated with the development are so low that if the applicant is</p>



	<p>ft assumptions need to be included</p> <p>Overall, there needs to be a correlation between the TTA and how the use of active travel measures are being encouraged. The approach seems to be that if the traffic impact is low, then that's OK but what we need to see is how is this development not centered around car-based travel which is a challenge given the topography of the site and the poor pedestrian infrastructure from the site to the essential services in the village, such as the school.</p>	<p>required to increase the applied trip rate, it would have no implications whatsoever for the study conclusions.</p> <p>The TTA includes an opening year +5yr forecast in line with TII Guidelines. In relation to modal shift, TRICS enables the user to undertake an assessment of the Trips Generated by type (e.g. by car, public transport, bicycle and pedestrian). The assessment has been rerun for Residential Housing and the TRICS output is attached to the TTA, which includes the hourly profile in terms of generation by Car, Pedestrian, Bicycle and Public Transport.</p> <p>A Bus Services and Capacity Report has been prepared by NRB Consulting Engineers and is included with the submission. This identifies that there is existing capacity in the half hourly 215 bus service to accommodate the proposed development.</p>
<p>Urban &amp; Street Design</p>	<p>Refer to previous assessment in recent SHD application. There are significant gaps in the receiving pedestrian network which will need to be addressed given the scale of the development, the intensification of use of the existing pedestrian network and the applicants ambitions to achieve their forecasted modal shift. Currently, there is no continuous, contiguous pedestrian network from the applicant's site to link the development with public transport services and the</p>	<p>The planning application is accompanied by a Preliminary Mobility Management Plan (i.e. Travel Plan), which when operational will greatly encourage the use of alternatives to the car. The Travel Plan and the TTA Report together highlight the safe good quality links locally to schools and services. There are continuous dedicated pedestrian pathways and crossing points provided locally within the town and area, linking the site to schools and services. In this regard, the TTA includes a</p>

	<p>existing educational facilities, this includes a primary school. The lack of connectivity is one of the key factors that discourage people from walking. While these are outside the red line boundary, it is considered appropriate that these works are provided by the applicant at the applicant's expense as part of the site development works and/or as part of a special contribution.</p> <p>Without these interventions, the applicant is proposing a car centric development, heavily reliant on driving the private car to undertake trips, including those less than 2km from the development.</p>	<p>dedicated Section "Cyclist &amp; Pedestrian Accessibility /Connectivity" section to address this aspect. In addition, the applicant is amenable to contributing towards enhanced pedestrian and cycle infrastructure in Blarney if required by the Board.</p>
Archaeology	<p>To refer to previous assessment in SHD application. The city archaeologist is available if there are further queries.</p>	<p>The report of the project archaeologist, John Cronin &amp; Associates (JCA), is noted. This states that <i>consultations have been undertaken between JCA and the Cork City Council Archaeologist, Ms Ciara Brett, in relation to the archaeological potential of the subject site and the required level of archaeological mitigation (phone conversation, 26 February 2021). It was agreed that an archaeological watching brief is the appropriate level of archaeological mitigation in this case.</i></p> <p>In addition, this report also states that <i>Given that the site is of low archaeological potential, it is recommended that an archaeological watching brief be instigated during site development works; such works should be monitored by a suitably qualified</i></p>

		<i>archaeologist to assess if sub-surface archaeological remains exist within the proposed development site.</i>
Environment	Clarification is sought around approach to managing the waste for the individual units.	Refuse storage is provided for all houses, and in the basement area for the apartments. A dedicated collection point is provided at the access ramp to the apartment basement. The proposed road layout can accommodate bin trucks.
Part V	As per previous application	20% of units (29no. units) are proposed for Part V, and these are located throughout the site. Costings are included with the planning application.

## 4.2 Section 5 Pre-Application Consultation Tripartite Meeting with An Bord Pleanála and Cork City Council

4.2.1 A tripartite meeting was held with An Bord Pleanála and Cork City Council via a Microsoft Teams Meeting on 18<sup>th</sup> June 2021. The Board issued its Opinion on the application on 9<sup>th</sup> July 2021, which stated that An Bord Pleanála is of the opinion that the documentation submitted would constitute a reasonable basis for an application for Strategic housing development. The Record of the Board Meeting and the Board's Opinion is attached at Appendix 3 to this Report. The following 6 items were discussed, as outlined in the Inspector's Report:

**Item 1:** *In relation to the Development Strategy, ABP representatives sought further elaboration / discussion / consideration on the following:*

*Rationale and clear justification for the density of the scheme having regard to Objective BL-R-03, the previous refusal on the site and national guidance.*

*Rationale for the proposed internal layout of the apartment units.*

*Consideration of the location and orientation of the apartment units.*

*Justification for the proposed housing mix.*

*Consideration of proposed materials*

*Consideration of phasing*

**Item 2:** *In relation to the Open Space, ABP representatives sought further elaboration/discussion/ consideration on the following:*

*Justification and clear rationale for design and layout of private open space, having regard to the concerns raised by the Planning Authority.*

*Consideration of the future use and maintenance of the open space within the northern portion of the site.*

*Consideration of the potential impact on hedgerows and trees provided within rear gardens of houses.*

**Item 3:** *In relation to the Visual Impact from Blarney Castle ABP representatives sought further*

*elaboration/discussion/consideration in relation to:*

*Consideration of the impact of the proposed development on views from Blarney Castle.*

*Consideration of the impact of the development on existing trees and hedgerows within the site, that currently screen the site when viewed from Blarney Castle.*

**Item 4:** *In relation to the Transportation and Accessibility ABP representatives sought further elaboration/discussion/consideration in relation to:*

*Consideration of the impact of traffic generated by the development on the surrounding road network and ensure the information provided in the traffic assessment is robust and evidence based.*

*Consideration of any upgrades that may be required on the surrounding road network to accommodate the development and associated increased pedestrian and vehicular movements.*

**Item 5:** *In relation to the Water Services ABP representatives sought further elaboration / discussion / consideration in relation to:*

*Consideration of the proposed drainage network within the site, regarding the location of the apartments in respect of wayleaves/retaining walls, stormwater assessment discrepancies and the application of SuDS.*

*Consideration of surface water run off rates and ensure the information provided is robust and evidence based.*

**Item 6:** *In relation to Any Other Matters, ABP representatives sought further consideration of the following:*

*The requirements of BRE209 / BS2011 with regard to Daylight / Sunlight / Overshadowing.*

*Any potential material contraventions of statutory plans should be identified and fully addressed.*

*All documentation submitted with the application should be consistent.*

The following specific information should be submitted with any application for permission arising from the notification as requested by An Bord Pleanála. The following points were outlined in the Opinion Report:

*Notwithstanding that the proposal constitutes a reasonable basis for an application demonstrate / justify the suitability of the proposed site to accommodate the residential density with regard to the sites BL-R-03 Objective as set out in the Blarney Macroom Municipal District Local Area Plan 2017, the provisions of the development plan and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); Circular NRUP 03/2021 Residential Densities in Towns and Villages; The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).*

*A report that addresses and provides a clear design rationale for the proposed design and layout, character areas, materials and finishes of the proposed development including specific detailing of finishes and frontages for the proposed apartment blocks, and the maintenance of same. Having regard the visual sensitivity of this site particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.*

*A layout plan and report that address and provides details of pedestrian connectivity to Blarney Town Centre.*

*A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces.*

*Childcare Demand Report, which identifies demand for childcare places likely to be generated by the proposal and the capacity of the childcare facility previously granted on the subject site and existing facilities in the vicinity to*

*cater for such demand.*

*School Demand Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.*

*Address issues raised in the planning authority's Area Engineers Report and the Road Design Report.*

*Address issues raised in the report of Irish Water to An Bord Pleanála dated 19th May 2021 and in the planning authority's Drainage Report.*

*A phasing plan for the proposed development which includes the phasing arrangements for the delivery of public open spaces and Part V provision.*

*A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.*

*A material contravention statement, in respect to any and all elements of the development that may materially contravene the Local Area Plan and Development Plan objectives or policies applicable to the site.*

*The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.*

4.2.2 The applicant's response to these issues is addressed under separate cover in the report entitled 'Statement of Response to An Bord Pleanála Opinion, February, 2022', which is included with the application package.

4.2.3 The Opinion issued by An Bord Pleanála also states that the following authorities should be notified of in the event of the making of an application arising from the notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended. The nine Prescribed Bodies listed below have since been notified.

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Department of culture, Heritage and the Gaeltacht
5. An Taisce
6. The Heritage Council
7. Fáilte Ireland
8. An Comhairle Ealaíon
9. Cork City Council Childcare Committee

## 5.0 PROPOSED DEVELOPMENT



**Plate 7 Proposed Site Layout**

- 5.1 The proposed development will consist of a strategic housing development of 143no. residential units (8no. 1-bed; 38no. 2-bed; 71no. 3-bed; and 26no. 4-bed units), comprising 105no. houses (3no. detached; 42no. semi-detached; and 60no. terraced units) and 38no. apartments (8no. 1-bed apartments and 30no. 2-bed apartments), ranging in height from 2-3 storeys above ground, including split-level houses.
- 5.2 The proposed development will also consist of the demolition of an existing garage and southern boundary wall, to be replaced with a new southern boundary wall, as well as the lowering of the existing eastern boundary wall and pier, at no. 1 Sunberry Drive; a crèche; all associated ancillary site development and landscaping works, to include bin stores, bicycle and car parking, ground works and retaining structures, foul drainage, stormwater drainage, water supply, service ducting and cabling, public lighting, relocation of existing ESB substation, and all boundary treatments. The proposed development is to be accessed via the existing Sunberry Heights/Sunberry Drive off the Blarney Relief Road (R617). An upgrade is proposed to the existing Sunberry Heights/Sunberry Drive and the existing access to the proposed strategic housing development, including the widening of the footpath at the junction with the Blarney Relief Road (R617), raised platforms, security barriers and fencing as necessary, road markings, and road resurfacing to facilitate improved pedestrian/cycle connectivity. Details relating to the housing types and proposed internal gross floor areas are outlined in the Housing Quality Assessment section of the Design Statement prepared by BRH Design Partners. An overview of the key development statistics is presented in Table 2 below:

<b>No. of Units</b>	143 (105no. houses (3no. detached; 42no. semi-detached; and 60no. terraced units) and 38no. apartments.
<b>Housing Mix</b>	1-bed apartment: 8 (3%) (458.8m <sup>2</sup> ) 2-bed apartment: 30 (16.5%) (2,455.2m <sup>2</sup> ) 2-bed house: 8 (4.4%) (656m <sup>2</sup> ) 3-bed house: 71 (53%) (7,875.6m <sup>2</sup> ) 4-bed house: 26 (23.1%) (3,439.4m <sup>2</sup> )
<b>Part V</b>	29no. units (8no. 2-bed apartments; 21no. houses (7no. 2-bed houses and 14no. 3 bed houses)
<b>Total Floorspace</b>	15,194.66m <sup>2</sup> (11,971m <sup>2</sup> (houses); 2,914m <sup>2</sup> (apartments) [14,885m <sup>2</sup> ]; creche (309.66m <sup>2</sup> ))
<b>Site Area</b>	7.79ha
<b>Net developable area</b>	4.1ha
<b>Density</b>	35units/ha
<b>Plot Ratio</b>	1: 0.2 (overall site); 1:0.4 (net developable area)
<b>Site Coverage</b>	0.2 (overall site); 0.4 (net developable area)
<b>Public Open Space</b>	19% (7,934m <sup>2</sup> )
<b>Crèche</b>	42no. child places (309.66m <sup>2</sup> ) with 258.8m <sup>2</sup> private open space
<b>Car Parking</b>	182 no. shared surface car parking spaces (including 18 no. electric vehicle charging points). In addition, 30 no. car parking spaces (including 4 no. Electric Vehicle spaces) are provided in the basement of the apartment blocks. This equates to an average rate of 1.3 spaces per unit.
<b>Bicycle Parking</b>	9no. dedicated communal cycle stands with space for up to 8no. bicycles each are provided throughout the proposed development, and 2no. large cycle racks are provided in the basement of the apartment blocks which could accommodate up to 90no. bicycles; a well as 76no. spaces in a large cycle parking area on the ground floor of each of the apartment blocks, giving an overall total of 238no. dedicated cycle spaces). Motorcycle parking (4no. bays) is also provided in the basement of the apartment blocks.

**Table 2 Key Development Statistics**

5.3 The schedule accommodation to be provided is broken down in Table 3 below.

House/Apartment Type	Number
4 bed / 7 person / 3 storey split level	9
4 bed / 7 person / 2 storey	17
3 bed / 5 person / 2.5 storey	24
3 bed / 5 person / 2 storey	39
3 bed / 4 person / 2 storey	8
2 bed / 4 person / 2 storey	8
<b>No. Houses</b>	<b>105</b>
2 bed / 4 person apartment	30
1 bed / 2 person apartment	8
<b>No. apartments</b>	<b>38</b>
<b>TOTAL</b>	<b>143 (105no. houses; 38no. apartments)</b>
Total Residential Floorspace	<b>14,885m<sup>2</sup></b> (11,971m <sup>2</sup> (houses)) (2,914m <sup>2</sup> (apartments))
Creche	<b>309.66m<sup>2</sup></b>
<b>Total Floorspace</b>	<b>15,194.66m<sup>2</sup></b>

**Table 3 Proposed Accommodation**

- 5.4 In terms of water and waste water services, and as detailed in the Engineering Services Report prepared by OLS Consulting Engineers, a Statement of Design Acceptance dated 16<sup>th</sup> September, 2021 has been received from Irish Water. The connection point for water supply is the 150mm water main running through the northeast of the site. The proposed development will be served by a network of 150mm diameter watermain laid out as shown on the accompanying drawings.
- 5.5 In terms of waste water, and as noted in the Statement of Design Acceptance dated 16<sup>th</sup> September, 2021, it is likely that an upgrade of the foul sewer in Sunberry Drive will be necessary to facilitate the development and have advised that should the works proceed, Irish Water may seek a contribution towards the upgrade of the network. Irish Water advise the detail surrounding any such upgrades and possible contributions can be agreed as part of the putting in place of a valid connection agreement. All houses on the site are served by 160/225mm diameter gravity foul sewers which collect foul effluent from each dwelling connection on the site. The new sewer shall be connected to the existing foul sewer network on Sunberry Drive. The Foul Sewerage System shall be designed and installed in accordance with the guidance contained in the "Code of Practice for Wastewater Infrastructure" published by Irish Water in July 2020 (Revision 2).
- 5.6 In terms of surface water, a SuDS Strategy Report has also been prepared by OLS Consulting Engineers and accompanies the planning application. It is proposed to attenuate surface water generated on the site in a series of 3 attenuation zones, and surface water is released to outfall at a rate equal to the calculated greenfield runoff rate for the site.
- 5.7 The attenuation volume for all zones is calculated on the basis of a 1 in 100 year return period and the outflow from each zone shall be equal to the Greenfield Run-Off Rate calculated for each zone. The outfall manhole from each attenuation zone shall be fitted with a Vortex Flow Control Valve to limit the flow to the outfall discharge points to the Greenfield Runoff Rate. A Hydrocarbon Interceptor shall be installed prior to each attenuation zone. The units to be installed shall be Kingspan Environmental Class1 Bypass Separators which shall be suitably sized to treat surface waters at generated in each attenuation zone. All Attenuation Zones will



be preceded by a Wavin Silt Trap (6LB600) to prevent excessive silt build up in the Aquacell Chambers. The principal point of discharge for surface water shall be to an existing unnamed stream/watercourse located to the west of the site. Presently there is an open land drain running in a north to south direction within the western boundary of the development site. At the southwest point of the development site, this open land drain joins with a similar land drain from the adjacent property to discharge into an existing watercourse which descends through the wooded area towards the Killowen Road and subsequently towards the R617 Regional Road. The watercourse crosses both roads via precast concrete culvert crossings.

Irish Hydrodata Ltd undertook a modelling assessment of the pre and post development scenarios on the existing stream and ancillary culverted crossings. The proposed development will give a 16% (19.2 litres/second) increase in the 1/100 year-rainfall event. Irish Hydrodata conclude that the post development flow of 142litres/second is well below the culvert capabilities, which are estimated to be circa 400litres/second, and therefore there will be no negative impact on the existing watercourse and associated road crossings which are deemed to have sufficient capacity.

Therefore, there will be no negative impact on the existing watercourse and associated road crossings which are deemed to have sufficient capacity.

Following consultation with Cork City Council on the surface water pathway, the following actions were taken to demonstrate connectivity:

- The culverted road crossing on the R617 Tower Road was visually inspected by OLS Consulting Engineers on Tuesday 23rd November 2021. The crossing comprised of a 600mm diameter concrete pipe which was clearly visible on the upstream side of the crossing.
- The crossing was dye traced on the day of the inspection and the outlet was located south of the R617 Tower Road where it discharges to an open watercourse which runs in a southerly direction from the R617 Tower Road. The 600mm diameter pipe was found to be heavily silted on the day of inspection and in need of cleaning.
- The dye tracing confirmed that the open land drain which descends through the woodland crossing the Killowen Road initially and subsequently the R617 Tower Road does connect to the open watercourse to the south of the R617 Tower Road which ultimately discharges to the River Martin.
- The matter of the condition of the culverted road crossing on the R617 Tower Road was subsequently discussed with Mr. Simon Lyons of the Water and Drainage Services Department of Cork City Council. It was agreed that that piped crossing will need to be cleaned and CCTV surveyed to ascertain the condition of the pipe. Cork City Council intend to undertake the cleaning and CCTV works in due course, however, Mr. Simon Lyons has indicated that the Planning Application may be lodged on the basis that connectivity has been demonstrated.
- Following the undertaking of the CCTV works on the piped crossing and at the point where the condition of the piped crossing has been established, it has been agreed that should remedial works be required to ensure the piped crossing is fit for purpose, the applicant shall enter into an agreement with Cork City Council to pay a contribution towards any remedial works to the crossing proportionate to the quantity of surface water discharging through the piped crossing from the proposed development.
- For the purposes of this application and predominantly from an environmental perspective, a "worst case" approach has been considered in respect of the necessary remedial works. From an

environmental perspective, it has been assumed that the road crossing may have to be replaced in its entirety and all environmental assessment and reporting is based on this "worst case" scenario although it is not envisaged that such extensive remedial works will be required. The following is an outline scope of the works required to replace the crossing in its entirety:

- Implement Traffic Management appropriate to the task and scope of the works in hand - this may necessitate a temporary road closure depending on how the contractor plans to undertake the works.
- Retain the existing culvert in operation for the duration of the laying of the new culvert crossing to prevent unnecessary contamination of surface water.
- Saw cut existing road surfacing, excavate trenching for new precast pipe and dispose of all waste materials to appropriate licensed facilities by licensed contractors.
- Lay new 600mm Precast Pipe Crossing, backfill with suitable fill material.
- Install new head wall at pipe outfall location.
- Divert surface water flow to new culvert and make good to inlet screen upstream of culvert.
- Decommission/remove old pipework.
- Backfill/reinstate road crossing in preparation for laying road surfacing.
- Lay road surfacing to match existing, seal all joints.
- Reinstate public footpath, hedgerows and existing boundaries.
- Reinstate road markings and signage where affected.
- Stand down traffic management procedures.

The second point of discharge for surface water shall be to the existing surface water sewer on Sunberry Drive. This discharge point shall only be used to serve the most south-easterly area of the site which can't be facilitated by the principal discharge due to levels. This point of discharge will accept circa 3.5% of the site runoff and this discharge will be limited to the greenfield runoff rate.

The area of the development site north of the Net Developable Area shall be retained as existing Meadow, to be supplanted with strategic planting. The site is sloping in a north to south direction towards the developable area of the site. To prevent excess surface water entering the developable area, an open swale shall be constructed north of the net developable area/ on the southern extremity of the existing meadow. The open swale shall facilitate infiltration and shall also be connected to the existing open land drain located on the western boundary of the development site.

- 5.8 In terms of landscaping, it is proposed to retain all vegetation associated with the existing woodland habitats bounding the site to the north, south and west. The proposed development includes a significant programme for tree planting, including additional specimen and small/medium woodland trees, including native species, along the northern boundary. The upper part of the site is excluded from development and the long-term planting strategy will provide green infrastructure in keeping with existing field boundary trees to provide a natural backdrop to the proposed development and will contribute towards the integration of the new development in the existing landscape. Landscape planting will be provided along the southern boundary to the south of proposed apartment blocks 1 and 2. This planting will consist of a line of tall growing Koster columnar oaks that will provide screening of the apartment blocks and also provide for a corridor between the oak treeline and the woodland to the south. The proposed development incorporates

19% public open space. This active open space incorporates the provision of 5 no. Neighborhood Play Areas, 2 no. multifunctional viewing/seating plazas, 7no. Public Open Space areas with level grass kickabout and/or terraced natural play areas, as well as a proposed woodland belt and wildflower areas throughout the site. The proposed development is set around a network of pathways, streets and open spaces that are of high quality. They provide an attractive public realm for both future residents and visitors to the site. A large landscaped open space is placed in the centre of the development providing a connection within the four different Character Areas. The main pathway runs through this open space and connects all the other open spaces. All public open spaces are over-looked by the adjoining properties to foster a sense of ownership amongst the community.

- 5.9 In terms of construction, and as detailed in the Engineering Services Report prepared by OLS Consulting Engineers, the estimated duration of work will be 24 months in total. The construction compound for the project will be located towards the southwestern boundary such that there is sufficient separation between the compound and the dwellings on Sunberry Heights. The compound area will consist of a crushed stone working platform, utilities, offices, welfare facilities and stores.

The site will require temporary connections for water and a connection to the foul sewer on the nearby Estate Road. It may be decided to install the permanent connections on the Estate Road to minimise disruption on the public road during the initial site setup and mobilisation phase. It will also be necessary to provide temporary power to the site which will include the installation of a temporary distribution board on site.

Following completion of the works; all construction materials will be removed from the compound, all temporary services decommissioned and disconnected and the area will be reinstated with finishes (e.g. topsoil) consistent with the landscaping features as identified in the project Landscape Masterplan.

Plant and machinery to be used during the construction phase will be typical construction machinery, including front-tip loaders, wheel loaders/load shovels, 360 degree excavators, off-road dump trucks, track machines, graders, telescopic handlers, compactors/rollers and backhoe loaders.

Typical materials to be used during the construction phase will include concrete, concrete blocks, bricks, slate, plaster, sand, insulated cladding panels, steel members etc. Hydrocarbons, such as petrols, diesels, oils etc and other plant and machinery lubricants will be used onsite during the construction phase. Aside from these latter materials, no hazardous material will be used during the construction phase. All hydrocarbons and other aqueous construction material will be stored in bunded areas within the construction compound on site. All refuelling by plant and machinery will be undertaken in designated bunded areas within the construction compound during the construction phase.

Section 7 of the Engineering Services Report prepared by OLS Consulting Engineering provides details of the Site Investigation works which were carried out by Priority Geotechnical in March and May, 2021 and associated assessment. No groundwater was encountered within the boreholes or trial excavations. An overview assessment of the extent of cut and fill needed to construct the proposed development is summarised in Table 7.1 of the Engineering Services Report. Essentially, the cut fill difference is +33,499.00m<sup>3</sup>. Any excavations to be stored on site will be stored in a designated stockpile area located in the construction site compound or other suitable location on site for the storage of segregated wastes

prior to their transport for recovery/disposal at suitably licensed/permited facilities.

Topsoil will be stockpiled on site for reuse in soft landscaping and will be stored separately to subsoils. Stockpiles will be graded to a <1:4 profile.

The stockpile area will be located over 50m from any watercourse or drainage channels occurring within the site. Stockpiles will be covered with plastic sheeting during wet weather and a temporary berm will be constructed around the stockpile area to prevent runoff to watercourses or drainage channels. Inert spoil material will be transported off site for deposition. All waste spoil material arising from the construction phase will be inert, non-hazardous spoil material and will be disposed at an approved facility.

- 5.10 The proposed development will be constructed in four phases in accordance with the phasing strategy set out in the Architect's Design Statement that accompanies this planning application. Development will start from the south and east of the site and develop firstly towards the north and then anticlockwise to the northwest and southwest areas of the site. Of particular note is that Phase 1 includes the entire central public open space area, works to the access road, as well as the creche, and the open land drain to the north.

## 6.0 PROPOSED DEVELOPMENT – COMPLIANCE WITH PLANNING POLICY

6.0 The key provisions of national and regional planning policy as it relates to the proposed development is set out in the following sections. The relevant policies and guidance that are relevant to the proposed development are as follows, and a list of the relevant Objectives are set out in Appendix 2 of this report:

- Project Ireland 2040 - National Planning Framework,
- Housing for All: A New Housing Plan for Ireland (2021)
- Regional and Spatial Strategy for the Southern Region (2020)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009),
- Sustainable Urban Housing Design Standards for New Apartments (2018)
- Urban Design Manual – A Best Practice Guide;
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities;
- Quality Housing for Sustainable Communities (2007);
- Design Manual for Urban Roads and Streets (2013);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Smarter Travel – A New Transport Policy for Ireland (2009-2020);
- The Planning System and Flood Risk Management (2009); and
- Birds and Habitats Directive – Appropriate Assessment;

### **Project Ireland 2040 – National Planning Framework**

6.1 The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of Ireland to the year 2040. Each of the three regions will prepare their own strategy in accordance with the Framework set by the NPF, known as Regional Spatial and Economic Strategies. County and City Development Plan review cycles will then fall in to line with their respective regional strategies, ensuring alignment between the hierarchy of plans.

6.2 The NPF sets out 10 no. strategic outcomes which are outlined as follows:

- Compact Growth
- Enhanced Regional Accessibility
- Strengthened Rural Economies and Communities
- High-Quality International Connectivity
- Sustainable Mobility
- A Strong Economy, supported by Enterprise, Innovation and Skills
- Enhanced Amenities and Heritage
- Transition to a Low Carbon and Climate Resilient Society
- Sustainable Management of Water, Waste and other Environmental Resources
- Access to Quality Childcare, Education and Health Services

6.3 Section 4.2 of the Plan notes that the CSO defines settlements of over 1,500 people as "urban". On this basis, and as a settlement of c. 2,539 (2016 census), Blaney is recognised as an urban area.

6.4 The following National Policy Objectives apply to the proposed development.

National Policy Objective 3a states:

*Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements'*

National Policy Objective 3c states:

*'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints'*

National Policy Objective 6 states:

*'Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area'.*

National Policy Objective 11 states:

*'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'*

National Policy Objective 27 states;

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

National Policy Objective 28 states;

*'Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.'*

National Policy Objective 32 states;

*'To target the delivery of 550,000 additional households to 2040'*

National Policy Objective 33 states;

*'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.'*

National Policy Objective 34 states;

*'Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.'*

6.5 The proposed development, located within the development boundary of the Metropolitan Town of Blarney in the recently extended Cork City boundary, within walking distance of an existing town centre, school and bus-stop, is

in compliance with these objectives of the NPF. In this respect, the proposed development will:

- Deliver additional residential development within the built-up footprint of Blarney (NPO3a);
- Deliver additional residential development within the built-up footprint of Blarney within Cork City (NPO3c);
- Deliver increased population and enhanced amenities in Blarney (NPO 6);
- Deliver additional population in the existing town of Blarney (NPO 11);
- Support a reduction in the use of the car in favour of walking and cycling (NPO 27);
- Facilitates a diverse and social inclusive society with a mix of house and apartment types, including social housing units (NPO 28);
- Will contribute to the delivery of the additional households required by 2040 (NPO 32);
- Provides new homes in a location that supports sustainable development (NPO 33); and
- The proposed development supports the provision of lifetime adaptable homes (NPO 34).

6.6 The NPF provides policy support for the development as proposed within the development boundary and existing built up area of an existing Town which avoids further sprawl and ensures efficient use of zoned and serviced land and contributes to compact growth and increased population and a creche service to enhance Blarney's function as an Urban Town in the expanded City. The mixed use scheme and Primary Care Centre permitted under ABP-309152-21 and ABP-308670-20 respectively will result in the provision of additional hotel, café, office, convenience retail and retail services, as well as new employment opportunities for Blarney, underpinning the need for further residential development to sustain and support these new services and employers, and strengthen the built up area of Blarney within the development boundary in line with national, regional and local planning policy for compact, sustainable growth.

#### **Housing for All: A New Housing Plan for Ireland (2021)**

6.7 The Housing for All Plan is focused on addressing the housing crisis, and in particular, the lack of housing development in the State relative to demand.

6.8 This Plan sets ambitious targets to increase housing supply to an average of at least 33,000 new units per year over the next decade, to include over 10,000 social homes each year over the next five years.

6.9 The Plan seeks to reverse the decline in home ownership and increase affordability, eradicate homelessness and increase social housing delivery as well as increasing new housing supply. It includes an 'Owner-Occupier Guarantee' in housing developments to secure homes exclusively for first-time buyers and other owner occupiers.

6.10 It is considered that the subject development, which proposes 143no. residential units, contributes directly to the achievement of the Pathway to Supporting Home Ownership and Increasing Affordability, by increasing supply.

6.11 29 no. housing units are to be transferred to Cork City Council in order to meet the developments Part V obligations. This will also contribute to the Pathway to Increasing Social Housing Delivery and Supporting Social Inclusion.

### Regional, Spatial and Economic Strategy for the Southern Region 2020

- 6.12 The Regional Spatial and Economic Strategy (RSES) for the Southern Region came into effect on 31<sup>st</sup> January 2020 and provides the framework through which the vision of the NPF will be delivered for the region.
- 6.13 The RSES outlines the settlement typology for the Region in Table 3.2 of the Plan and Metropolitan areas, such as Blarney, are identified in the first tier of the typology.
- 6.14 It is further noted that a key component of the strategy is to strengthen the settlement structure of the Region, to capitalise on the individual and collective strength of the three cities, metropolitan areas, and strong network of towns. It is considered that the proposed development within the existing built up footprint, and development boundary of Blarney, will aid in strengthening the Metropolitan area of Blarney.
- 6.15 Strategy no. 1 of the RSES is set out as follows:

*Strengthening and growing our cities and metropolitan areas; harnessing the combined strength of our 3 cities as a counterbalance to the Greater Dublin Area, through quality development, regeneration and compact growth; building on the strong network of towns and supporting our villages and rural areas.*

- 6.16 The proposed development will deliver 143 no. residential units within the metropolitan area of Blarney and within the City Boundary, therefore increasing the population of both the city and metropolitan area, and consequentially will help in achieving Strategy no. 1 of the RSES.
- 6.17 The RSES also include a Metropolitan Area Strategic Plan (MASP) for Cork. Section 7.3 relates to strategic residential and regeneration areas, where it is noted that there is a potential housing yield of 3,555 in Blarney. Therefore, the proposed development of 143 no. units will aid in delivering this housing yield.

### Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

- 6.18 The role of these Guidelines is to ensure the sustainable delivery of new development by:
- Prioritising walking, cycling and public transport, and minimise car usage;
  - Providing easy to access for all users and to find one's way around;
  - Promoting the efficient use of land and of energy, and minimise greenhouse gas emissions;
  - Providing a mix of land uses to minimise transport demand; and
  - Reducing traffic speeds in housing developments
- 6.19 The Guidelines set out the core principles of urban design to create places of high quality and distinct identity. In this regard, the Guidelines are accompanied by a Design Manual, which demonstrates how design principles can



be applied in the design and layout of a new residential development at various scales and in various settings.

6.20 Smaller towns and villages are a very important part of Ireland's identity and the distinctiveness and economy of its regions. Within the guidelines, smaller towns and villages are defined as those with a population ranging from 400 to 5,000 persons.

6.21 The Guidelines take a plan-led approach to development of residential areas with Section 2.1 of the Plan noting the following:

*The scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy.*

6.22 As set out in the Guidelines, new development in smaller towns should contribute to compact towns and villages. Section 6.3 clarifies the preferred location of new residential development in towns as follows:

*It is appropriate that the investment in such services is utilised properly through the prioritisation of development that either re-uses brown-field development land such as central area sites and backlands or through the development of acceptable "green-field" sites at suitable locations within the immediate environs of the small town or village concerned (our emphasis added).*

6.23 Section 6.4(i) of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) also require Planning Authorities to ensure that the development of small towns within 45minutes-1 hour travel of major cities, as is the case with Blarney and its location relative to Cork City, is aligned with national and regional policy to build up the critical mass of key towns.

6.24 Section 6.11 of the Guidelines set out the density consideration for sites at the edge of town centres, such as the subject site, as follows:

*Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 25-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.*

6.25 The Guidelines also note that densities may be informed by Local Area Plans. The Blarney Macroom Municipal District Local Area Plan 2017 zones the subject site for Medium B Density, 12-25 units per hectare. When calculating density, Appendix B of the Guidelines notes that the net site area for the purposes of calculating density should exclude the following:

- Major and local distributor roads;
- Primary schools, churches, local shopping etc.;
- Open spaces serving a wider area; and
- Significant landscape buffer strip.

6.26 Having regard to the overall zoning objective of the site, which states "the upper part of the site, closer to the

ridge, is generally unsuitable for development and should be retained as open land uses with long term strategic planting as part of the overall scheme”, the net site area does not include the upper part of the site, this being a significant landscape buffer strip. The local access road is also excluded from the net developable area in compliance with Appendix B of the Guidelines.

6.27 The density of the proposed development is based on the net developable area of 4.1ha, which, in this instance equates to 35 units per hectare. Noting that the Medium B density range permits 12-25 units hectare and having regard to the recent planning history under application register reference ABP-308156-20, the proposed density may be considered to constitute a material contravention of the specific objective (BL-R- 03) that applies to the proposed development site. In this context, a Statement of Material Contravention is provided under separate cover. The conclusions of this Statement are as follows:

- *the proposed development is of strategic importance as a strategic housing development, and it will contribute to an increased supply of residential accommodation in line with the National Planning Framework and the Housing for All Plan where there is evidence of demand and an acute shortfall in supply, and*
- *permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government.*

#### **Sustainable Urban Housing Design Standards for New Apartments (2018) (as amended)**

6.28 Section 2.4 of these Guidelines indicate that the proposed development site, being located in Blarney Metropolitan Town on the edge of Cork City, but within walking distance of a half-hourly bus service, would fall to be considered between an 'intermediate urban location' and a 'peripheral urban location', where a medium-high density development including apartments would generally be suitable. Compliance with these standards is summarised in Table 4 below, noting that:

<b>Apartment Type</b>	<b>Proposed Gross Floor Area (m<sup>2</sup>) (req)</b>	<b>Proposed Main Living Room (m<sup>2</sup>) (req)</b>	<b>Proposed Aggregate Living Area (m<sup>2</sup>) (req)</b>	<b>Proposed Aggregate Bedroom Area (m<sup>2</sup>) (req)</b>	<b>Proposed Storage (m<sup>2</sup>) (req)</b>
1-bed (2 person) apartment (2E, 3D– 8 no. units in total)	53.4-61.3 (45)	4.3-5.8 (3.3)	24.5-27.2 (23)	13-14.1 (11.4)	3 (3)
2-bed (4 person) apartment (30no. units in the 2no. blocks of apartments)	78.8-84.32 (73)	4.6-5.78 (3.6)	31-34 (30)	25-27 (24.4)	6-8 (6)

**Table 4 Compliance with the 2018 Standards**

- All apartments within the development exceed the minimum floor areas for apartments.
- All the proposed apartment units exceed the minimum floor areas standard for each apartment type.
- 12.49% of the apartments have more than the recommended minimum floorspace.
- All proposed apartments are dual aspect.
- All of the apartments proposed achieve floor to ceiling heights of 2.7m.
- All stair/lift cores proposed as part of this scheme serve 5no. units as a maximum per floor and therefore comply with this standard.
- Each apartment meets or exceeds the standards set out in the Guidelines for storage space. In addition, as the internal floor areas generally exceed the minimum standards, it is considered that this will allow for the provision of additional storage as required by the occupant.
- All apartments in the proposed development exceed the minimum standards in terms of private amenity space.
- All apartments front onto the surrounding public realm, affording the space with passive surveillance and increasing the sense of safety in the area. The apartments overlook the main areas of open space, as well as parking areas. All entrance points are safe and secure, located at street level in order to ensure pedestrian activity is maximised.
- All access points will be Part M compliant. The variety of public open spaces have been designed to ensure that all members of the public, regardless of age or ability can access the spaces.
- Ample private amenity space, as well as public open space has been provided throughout the development. On this basis, specific communal rooms are not considered necessary in this context. A creche facility has been provided as part of the development which offers an additional amenity for the occupants of the apartments
- Bin stores have been provided at each apartment block to facilitate the storage and collection of waste materials. Specific drawings outlining dimensions, and specifics of the proposed bin stores have been submitted. The locations of the bin stores have been identified on the layout plans, and it is confirmed that there are all accessible by both refuse vehicles and occupants alike.
- Having regard to SPPR 1 and 2 of the Guidelines, 5% of the proposed development comprise apartments. No studio units are proposed. No apartments with 3 or more bedrooms are proposed. As part of the dwelling mix, 97no. 3 and 4-bed houses (68%) are proposed.

### Urban Design Manual – A Best Practice Guide

6.29 This Guide is based around 12 Criteria that have been drawn up to encapsulate the range of design considerations for residential development. They are, in essence, a distillation of current policy and guidance and tried and tested principles of good urban design.

6.30 An architectural Design Statement has been prepared by BRH Design Partners. This statement addresses the 12 criteria in more detail, however a summary of the criteria as they relate to the proposed development is outlined below:

Criteria	Issue	Response
Context	How does the development respond to its surroundings?	<ul style="list-style-type: none"> <li>The proposed development site is located on the north-western side of Blarney town within the development boundary in an established primarily residential area of generally medium density.</li> <li>The proposed development will effectively complete the existing Sunberry Heights and Sunberry Drive developments with which it shares an access.</li> <li>The proposed development will form a new identity within the locality and contribute positively to the area. The layout of the site has been informed by the sloped topographical nature of the site, the creation of distinct home zones and the provision of generous, overlooked usable open spaces. The site layout, architecture and landscape are consistent and compatible with the area.</li> </ul>
Connections	How well connected is the new neighbourhood?	<ul style="list-style-type: none"> <li>The proposed development site is within walking and cycling distance of Blarney Town's amenities. The nearest bus stop connection (215) to Cork city centre is no more than 10 minutes' walk from the proposed development site (6-8 minutes from the site entrance of the proposed development), and this bus route has capacity.</li> <li>The proposed development also provides improved local road infrastructure for the benefit of existing and future residents, including pedestrians and cyclists.</li> </ul>
Inclusivity	How easily can people use and access the development?	<ul style="list-style-type: none"> <li>The proposed development is accessed via the R617 and Sunberry Heights/Drive. All roads and footpaths are proposed at no more than</li> </ul>

		<p>1:20 to ensure ease of access. A specific pedestrian and cyclist trail is proposed through the site, which will facilitate connection to existing and proposed trails in Blarney Town. As noted above, the proposed development site is within walking and cycling distance of Blarney Town's amenities, including the nearest bus stop.</p> <ul style="list-style-type: none"> <li>• 5no. large, accessible public open space areas are proposed at the heart of the proposed development site, with 4no. pocket park areas. The main open spaces are located in the heart of the site, with good pedestrian links. Other open spaces are spread through the site creating pockets of green areas in various different parts. All public open spaces are overlooked by the adjoining property to allow for passive surveillance to occur. In general, units front onto open spaces, with feature gables providing overlooking in specific cases.</li> </ul>
<p>Variety</p>	<p>How does the development promote a goodmix of activities?</p>	<ul style="list-style-type: none"> <li>• The proposed site layout accommodates a variety of different open spaces that are suitable for different activities and usages, including:             <ul style="list-style-type: none"> <li>• shared vehicular and pedestrian surfaces that create differenthome-zones;</li> <li>• landscaped public open spaces crossed by pedestrian and cyclefootpaths;</li> <li>• paved urban open spaces (plazas) with viewing areas and greenpockets.</li> </ul> </li> <li>• Variety is also explored in the differing unit types, ranging from smaller 'starter' homes to family homes, including 3no. detached, 42no. semi-detached, 60no. terraced houses, and 38no. apartments, consisting of 8no. 1-bed; 38no. 2-bed; 71no. 3-bed; and 26no. 4-bed units, creating a vibrant neighbourhood with varying requirements for a range of occupants. The units are dispersed across the site to offer interesting elevational treatments.</li> <li>• 29no. Part V units are also dispersed throughout the site.</li> <li>• The site itself is divided into four main character areas. Within these areas, units are</li> </ul>

		<p>characterised by a change in scale, house type and elevational treatment.</p> <p>There are also main focal points characterised by different elevational treatments that face shared surface and create different home-zones. This will create distinctive home zones, which will aid the development in sitting comfortably within the site's greater context. Other secondary shared surfaces are spread around the site to prioritise movement and to slow down traffic speed.</p>
<p>Efficiency</p>	<p>How does the development make appropriate use of resources, including land?</p>	<ul style="list-style-type: none"> <li>• The proposed layout considers the existing surrounding developments, the topographical nature of the site and the amenities required for the proposed dwellings.</li> <li>• The layout is considered to allow for the most efficient use of the site. Public open spaces are designed to add to the quality of life of the residents.</li> <li>• The overall density of 35 units/ha ensures that the efficient and appropriate use of the proposed development site is achieved.</li> <li>• Buildings are arranged to ensure optimum solar gain.</li> </ul> <p>Careful consideration has been given to the location of dwellings relative to each other to ensure amenity is maintained.</p>
<p>Distinctiveness</p>	<p>How does the proposal create a sense of place</p>	<ul style="list-style-type: none"> <li>• The proposed development uses a variety of external finishes and house styling, generally arranged around open spaces that permeate the site, that connect the Character Areas, and that are overlooked in all instances, including the apartments to the south-west, to ensure a safe environment for all.</li> <li>• Each of the four Character Areas to create distinctive yet connected neighbourhoods within the overall development.</li> <li>• Landscaping and planting are integrated throughout, to maximise the appeal of the proposed development.</li> <li>• The proposed development provides for a mix of house types and designs that are distinctive to each Character Area, while also ensuring a common and identifiable motif.</li> </ul>

<p>Layout</p>		<ul style="list-style-type: none"> <li>• Traffic speeds are controlled by a combination of a reduced length to roads, a variety of surface treatments and raised tables, with the internal street hierarchy designed to create a self-regulating slow speed environment favouring pedestrian and cyclist movement, aided by a reduced level of car parking.</li> <li>• Shared spaces on lower trafficked streets are provided internally within the site.</li> <li>• Footpaths are no less than 1.8m.</li> <li>• The proposed development will be signposted as a 3-kph 'slow zone' or 'home zone'.</li> <li>• Where carriageway kerbs are required, heights will be typically 75- 80mm.</li> <li>• A specific pedestrian and cyclist trail is proposed through the site, which will facilitate connection to existing and proposed trails in Blarney Town.</li> <li>• The Sunberry Heights access road will be improved to create enhanced pedestrian and cyclist movement. Appropriate visibility splays are provided at the entrance to the proposed development and at the R617 junction.</li> </ul>
<p>Public Realm</p>	<p>How safe, secure and enjoyable are the public areas?</p>	<ul style="list-style-type: none"> <li>• The proposed development is set around a network of pathways, streets and open spaces that are of high quality. They provide an attractive public realm for both future residents and visitors to the site. A large landscaped open space is placed in the centre of the development providing a connection within the four different Character Areas. The main pathway runs through this open space and connects all the other open spaces.</li> <li>• All public open spaces are overlooked by the adjoining properties to foster a sense of ownership amongst the community.</li> <li>• A number of play areas are located in the development that will be built according to Cork Co. Council recreation and amenity guidelines and will provide a useful amenity for residents. The generous landscaped open space will contribute to the quality of life in the locality.</li> </ul>
<p>Adaptability</p>	<p>How will the building cope with</p>	<ul style="list-style-type: none"> <li>• All units are designed in accordance with the</li> </ul>

	change?	<p>Guidelines on “Quality Housing for Sustainable Communities”, and the Apartment Guidelines, 2018.</p> <ul style="list-style-type: none"> <li>• Houses in the development can be easily adapted to the future needsof occupants. There are sufficient areas to certain dwelling houses to facilitate future expansion over ground, first floor and attic, without compromising the character of the houses.</li> <li>• For example, provision has been made to extend in the attic in housetype 1C (12no.), and the ground floor can be extended to the rear.</li> </ul>
		<ul style="list-style-type: none"> <li>• Each unit has access to generous private amenity spaces in excess of the minimum standards.</li> <li>• All the units have a dual aspect. Windows are sited to prevent overlooking into adjacent private gardens.</li> <li>• All dwellings have adequate storage areas and areas for sorting of recyclables, while the apartments have private storage areas and a communal area for the bins.</li> <li>• Bike racks and electric car points are spread around the site.</li> <li>• There are no overshadowing or privacy issues that affect existing houses.</li> <li>• Bike racks and electric car points are spread around the site.</li> </ul>
Parking	How will the parking be secure and attractive?	<ul style="list-style-type: none"> <li>• The proposed 105no. units will be served by a total of 182no. shared car parking spaces, of which 18no. are EV charging spaces. This equates to an average of 1.7 spaces per unit.</li> <li>• The proposed 38no. apartments will be served by 30no. car parking spaces (0.8 spaces per apartment) including 4no. EV charging spaces. There is also provision for 4no. motorcycle parking bays in the apartments.</li> <li>• 9no. dedicated communal cycle stands with space for up to 8no. bicycles each are provided throughout the proposed development, and 2no. large cycle racks are provided in the basement of the apartment blocks which could accommodate up to 90no. bicycles; a well as 76no. spaces in a large cycle parking area on the</li> </ul>



		ground floor of each of the apartment blocks, giving an overall total of 238no. dedicated cycle spaces.
Detailed Design	How well thoughtthrough is the building and landscape design?	<ul style="list-style-type: none"> <li>• Each dwelling is designed for its location on the site.</li> <li>• The external materials of the units were selected to have a positive contribution to the locality and make reference to the local aesthetic.</li> <li>• A proposed mix of red/brown/tan/grey brick; concrete roof tiles; white render; limestone/aluminium cladding; beige/grey pvc windows; beige/black pvc gutters and downpipes for each CharacterArea will provide for a contemporary, yet durable, development whilst respecting the existing buildings adjacent to the site.</li> <li>• The design of the buildings and public space will facilitate easy maintenance. Care has been taken to design the location of bins and vents to prevent impact on the public amenities.</li> </ul>

**Table 5 Compliance with the Urban Design Manual**

- 6.31 The Architectural Design Statement prepared by BRH Design Partners sets out how the proposed development complies with the requirements for Universal Design.
- 6.32 It is submitted that the proposed development delivers a high-quality residential development in an established residential area in the Metropolitan Town of Blarney ( in the expanded Cork City boundary).

**Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities.**

- 6.33 The Department's policy statement 'Delivering Homes, Sustaining Communities Guidance' provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community.
- 6.34 The Delivering Homes, Sustaining Communities policy statement is accompanied by Best Practice Guidelines entitled '**Quality Housing for Sustainable Communities**', to promote high standards in the design and construction and in the provision of residential and services in new housing schemes.
- 6.35 The Guidelines relate primarily, but not exclusively, to housing accommodation for individual households, ranging from single person to large family households. They do not purport to be comprehensive nor seek to prescribe design solutions. They are intended to assist designers but proper design input on each project remains essential.
- 6.36 Of particular importance within these guidelines is Table 5.1, which outlines the standards for space provision and room sizes for typical (relevant) dwelling types as follows:

Dwelling Type	Target Gross Floor Area (m <sup>2</sup> )	Minimum Main Living Room (m <sup>2</sup> )	Target Aggregate Living Area (m <sup>2</sup> )	Target Aggregate Bedroom Area (m <sup>2</sup> )	Target Storage (m <sup>2</sup> )
4Bed/7P House (3 storey)	120	15	40	43	6
4Bed/7P House (2 storey)	110	15	40	43	6
3 bed/5P House (3 storey)	102	13	34	32	5
3 bed/5P House (2 storey)	92	13	34	32	5
3 bed/4P House (2 storey)	83	13	30	28	4
2 bed/4P House (2 storey)	80	13	30	25	4

**Table 6 Extract from Table 5.1, Quality Housing for Sustainable Communities**

6.37 Having regard to the details set out in the Housing Quality Assessment included in the Architectural Design Statement prepared by BRH Design Partners, the proposed housing units either fully comply with or exceed the standards set out in Table 5.1 of the Quality Housing for Sustainable Communities Guidelines for the relevant proposed dwelling types, as illustrated in Table 7 below.

Dwelling Type	Proposed Gross Floor Area (m <sup>2</sup> )	Proposed Main Living Room (m <sup>2</sup> )	Proposed Aggregate Living Area (m <sup>2</sup> )	Proposed Aggregate Bedroom Area (m <sup>2</sup> )	Proposed Storage (m <sup>2</sup> )
4Bed/7P House (3 storey split level)(1G, 1G(i)) – 9no. units)	162.1	18.6	52.4	53	6
4Bed/7P House (2 storey) (2C, 3B, 3B(i)) – 17no. units)	116.5	16.7-17	40.2-40.3	43.2-43.3	6
3 bed/5P House (2.5 storey) (1E, 1F, 4A, 4B – 24no.units)	114.7-125.3	17-17.5	35.3-36	43.4-49	6
3 bed/5P House (2 storey) (1A, 1B, 1B(i), 1C, 1D, 2A, 3A, 4C, 4C(i)) – 39no. units)	101.7-114.3	16-22	36-40.9	32.8-39	6
3 bed/4P House (2 storey) (2B – 8no. units)	89.7	17	35	32	6
2 bed/4P House (2 storey) (2D, 2F, 3C – 8no. units)	80-88	13-17	30-32	25-26	4

**Table 7 Proposed Standards for each house/apartment type based on Table 5.1, Quality Housing for Sustainable Communities**

### Design Manual for Urban Roads and Streets

6.38 To effectively communicate how the principles, approaches and standards within this Manual have been applied, it is recommended that all proposed developments, regardless of scale, are accompanied by documentation that provides a clear rationale for the project, such as within a design statement.

6.39 To ensure that street layout plans communicate a complete picture of the design, it is recommended that the following information be presented, as appropriate:

- The width of streets, footways, verges, medians and privacy strips.
- The location, type and configuration of crossings and junctions.
- Corner radii (including swept paths).
- On-street parking.
- Horizontal and vertical alignment data.
- Horizontal and vertical deflections.
- Forward visibility splays.
- Kerb lines (including heights).
- Surface Materials and Planting.
- Street furniture and facilities.

- Signage and Line Marking.
- Lighting.

6.40 A Statement of Compliance with the Design Manual for Urban Roads and Streets has been prepared by NRB Consulting Engineers.

6.41 This states that the proposed layout seeks to successfully create an appropriate balance between the functional requirements of different network users whilst enhancing the 'sense of place', including:

- a) *The main vehicular access roads to the development are by way of the established simple priority controlled junction from the established Sunberry Heights roadway,*
- b) *The proposed scheme includes provision of well designed connections and links to the town centre, enhancing permeability for non-car modes.*
- c) *Under Section 3.4.1 Vehicle Permeability, DMURS states that 'Permeable layouts provide more frequent junctions which have a traffic-calming effect as drivers slow and show greater levels of caution'. This is clearly provided for within the layout design with a permeable street network.*
- d) *DMURS also goes on to state that 'Designers may be concerned that more permeable street layouts will result in a higher rate of collisions. However, research has shown that there is no significant difference in the collision risk attributable to more permeable street layouts in urban areas and that more frequent and less busy junctions need not lead to higher numbers*
- e) *The proposed design deliberately seeks to specify minimal signage and line markings along the internal layout, with such treatments used sensitively throughout and predominately at key nodes and 'transition' areas.*
- f) *Footpaths no less than 1.8m (generally 2.0m or wider) will be provided throughout the scheme with connections and tie-ins to existing external pedestrian networks.*
- g) *Appropriate clear unobstructed visibility splays, as per DMURS requirements, are provided at the site access junctions to the external road network, and internally within the site, with Forward Stopping Distance maintained around bends.*
- h) *Well designed and frequent pedestrian crossing facilities will be provided along key travel desire lines throughout the scheme in addition to those located at street nodes where raised platforms are provided consistent with DMURS.*
- i) *All courtesy crossings will be provided with either dropped kerbs with appropriate tactile paving, and/or raised tables, thereby allowing pedestrians to informally assert a degree of priority. The street activity and landscaping design within the open space aid in this aspect of the layout.*
- j) *At the R617 Public Road Junction, further sightline, street lining and alignment improvements are proposed to enhance safety and traffic progression.*
- k) *Internally within the site, all informal pedestrian crossing facilities will be at least 2.0m wide, whilst any required controlled pedestrian crossings will be a minimum of 2.4m wide.*
- l) *With the objective of encouraging low vehicle speeds and maximising pedestrian safety and convenience, corner radii will be 6m where swept path analysis permits and will be of further reduced radii where feasible in line with DMURS guidance.*
- m) *Internally within the development, where carriageway kerbs are required, heights will be typically 75-80mm in accordance with the objectives of DMURS.*
- n) *Within the development, as required, cyclists will share the carriageway with other street users as per the National Cycle Manual guidance for such situations and best practice for residential streets of this nature.*
- o) *Any required street signage and road markings will be in accordance with the Department of Transport Traffic Signs Manual, and the location and form will be agreed in advance with Cork City Council.*

### **Guidelines for Planning Authorities on Childcare Facilities (2001)**

- 6.42 The Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed.
- 6.43 A creche has been provided. Through consultation with the Cork City Childcare Committee, a 42 child creche forms part of the proposed development. The proposed creche is to be delivered as part of Phase 1 of the proposed development.

### **Smarter Travel – A New Transport Policy for Ireland (2009-2020)**

- 6.44 In the Smarter Travel Policy, the Government reaffirms its vision for sustainability in transport and sets out five key goals:
- to reduce overall travel demand
  - to maximise the efficiency of the transport network
  - to reduce reliance on fossil fuels
  - to reduce transport emissions and
  - to improve accessibility to transport

- 6.45 One of the targets set out in the policy document to achieve these sustainable transport and travel goals by 2020 is outlined as follows:

*Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services*

- 6.46 It is submitted that the proposed development, located within the development boundary of Blarney, with a reduced car parking provision, EV spaces, dedicated cycle spaces, and pedestrian and cyclist priority, within walking distance of a range of facilities and services, in addition to being located 430m from a regular City bus service, which has available capacity, is supported by the provisions of Smarter Travel.

### **The Planning System and Flood Risk Management (2009)**

- 6.47 The Guidelines provide “mechanisms for the incorporation of flood risk identification, assessment and management into the planning process...”. They ensure a consistent approach throughout the country requiring identification of flood risk and flood risk assessment to be key considerations when preparing development plans, local area plans and planned development.
- 6.48 The proposed development site has not been identified as at risk of flooding and therefore a Flood Risk Assessment is not required.

6.49 In addition, as noted in the Engineering Report, the proposed development provides for the attenuation of surface water within the site. The discharge of surface water arising from the proposed development to the existing stream/watercourse shall be at a rate equal to the Greenfield Runoff Rate to ensure no significant changes in flow in the existing stream/watercourse.

#### **Bird and Habitats Directive – Appropriate Assessment**

6.50 Under Article 6 (3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 – 2010).

6.51 A Screening Report for Appropriate Assessment has been carried out by Doherty Environmental. Only one European Site, the Cork Harbour SPA, was identified as occurring within the potential sphere of influence of the project. This SPA is designated for its role in supporting 23 wetland bird species and wetland habitats. Of the 23 special conservation interest bird species of the SPA, 16 were identified as potentially occurring within the zone of influence of the project. In addition wetland habitats of the SPA, particularly estuaries and mudflats were also identified as potentially occurring within the zone of influence of the project. The reason for identifying these special conservation interests within the potential zone of influence of the project was due to the presence of a potential hydrological impact pathway linking the project site to intertidal foraging areas and roosting sites used by these 16 species.

6.52 The potential for the project to result in effects to special conservation interests bird species and wetland habitats occurring downstream of the project site was screened in during the examination completed in the Screening report. The reason for screening in likely significant effects downstream at key intertidal foraging and roosting locations at the River Lee estuary is based on the existing at risk status of this waterbody and the potential for the project, in the absence of appropriate safeguards, to combine with other projects and land use activities, and contribute to water quality pressures that are undermining the status of this waterbody and the implications polluted water quality has for estuarine mudflat habitats and the waterbird species that rely upon them. The potential for likely significant effects to European Sites cannot be ruled out at the Screening stage and that an Appropriate Assessment of the project is required. Based on this conclusion a NIS has been prepared to inform the competent authority during its Appropriate Assessment of the project and its potential to result in adverse effects to the integrity of the Cork Harbour SPA.

6.53 The NIS presents an analysis of the potential for the project to result in adverse impacts to the Cork Harbour SPA. An evaluation of the potential impact of discharges of surface drainage waters has been completed. During the evaluation of potential impacts associated with the discharge of surface drainage waters it was found that, in the absence of mitigation measures, the potential will exist for contaminants to be released from the project site to the Shournagh Estuary and downstream to the Lower River Lee and for negative impacts to intertidal habitats and wetland bird species downstream. A range of mitigation measures have been prescribed in this NIS that aim to avoid the discharge of contaminated surface drainage waters from the project site during the construction phase and operation phase and during works associated with the replacement of a culvert crossing under the Tower Road R617. These mitigation measures have been evaluated and reference has been made to their successful implementation for other similar development projects in the vicinity of the project site and the River Lee within

Cork City. It has been concluded that, provide all mitigation measures that aim to avoid the discharge of contaminated surface drainage waters are implemented, the potential for this impact to occur will be eliminated and associated adverse impacts to the Cork Harbour SPA will not arise.

- 6.54 Based upon the information provided in this NIS, it is the considered view of the authors of the NIS that it can be concluded by An Bord Pleanála that the project will not, alone or in-combination with other plans or projects, result in adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.

## 7.0 CONSISTENCY WITH LOCAL PLANNING POLICY

7.0 Noting the extended boundary for the City as of May, 2019, with the effect that Blarney is now located in Cork City, the proposed development site remains to be guided by the provisions of the following current local policy documents<sup>1</sup>:

- Cork County Development Plan, 2014
- Blarney-Macroom Municipal District Local Area Plan, 2017

### Cork County Development Plan, 2014

7.1 In the Cork County Development Plan, 2014, Blarney is identified as a Metropolitan Town. Table CS 3-1 of the Plan outlines the settlement hierarchy for Cork, with Blarney, as a Metropolitan Town, forming part of the third tier of the hierarchy. The role of Metropolitan Towns, as set out in Table CS 3-1, is outlined as followed:

*Critical population growth, service and employment centres within the Cork "Gateway", providing high levels of community facilities and amenities with infrastructure capacity high quality and integrated public transport connections should be the location of choice for most people especially those with an urban employment focus.*

7.2 Having regard to Objective CS 3-1, the principle of residential development in Blarney is considered acceptable. The proposed development has also had regard to the objectives of the development plan, and the relevant objectives and the proposed development's consistency with these objectives is outlined in Table 8 below:

Objective	Development's consistency
<b>CS 4-1 J</b>	The proposed development is located in Blarney, which is located along the Blarney-Midleton/Cobh rail line, where it is an objective to maximise new development forhouses.
<b>CS 4-1 N</b>	The subject site is located in the Cork Gateway, where development to provide the homes and jobs necessary to serve the planned population are prioritised.
<b>HOU 3-1</b>	The proposed development has had full regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual. The proposed development promotes sustainable methods of transport including walking, with permeability facilitated within the development itself as well as connectivity to existing residential developments, as well as to the Town Centre of Blarney which is located to the south of the site.

<sup>1</sup> Blarney is identified in the Issues Paper to inform the preparation of the new City Development Plan as one of 4no. Urban Towns in the city, and the City Capacity Study currently been undertaken by Cork City Council indicates that are the 4 Urban Towns have the largest total area of underutilised and undeveloped land identified



<p><b>HOU 3-2</b></p>	<p>The proposed development has had full regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual. The Council’s Design Guide for Residential Estate Development is also based on these documents and therefore it is considered that the proposed development is also in accordance with this Council guidance. In addition, a Design Statement and a Statement on DMURS compliance is included which satisfies Objective HOU 3-2 (c) and HOU 3-2 (d) respectively.</p>
<p><b>HOU 3-3</b></p>	<p>In relation to Housing Mix, the Plan states that a Statement of Housing Mix is required for all applications for multi-unit residential. It does not, however, give guidance on target mix. As a guide, as Blarney is now located in Cork City, Table 16.4 of the current Cork City Development Plan 2015 sets a target of a maximum of 20% apartments, a minimum of 30% 2-bed units and a minimum of 50% 3/3+ bed units for the suburbs of the City. Equally, Table 4.40 of the draft Joint Housing Strategy for Cork City and County (January, 2022) anticipates an increase of 1,353 dwellings in the City between 2022-2025. A dwelling composition of 2,184 (82%) houses and 519 (19%) apartments is anticipated in Cork City in 2025. This is caveated in section 4.4.3 of the draft Strategy by the statement: <i>unit type mix over the 2022-2028 period is difficult to forecast with any degree of certainty as the type of new units that will be developed in the coming years will depend heavily on market conditions, development costs, economic conditions, and public policy including national measures to stimulate housing development. It will also be determined by local planning policy set by Cork County Council and Cork City Council.</i></p> <p>Furthermore, section 5.4.5 of the draft Strategy notes that <i>the majority of new homes in the Urban Towns, such as Blarney, are likely to be houses.</i> Section 5.4.5.2 of the draft Strategy notes that <i>as with other urban towns, the greenfield nature of some sites and existing demographics may entail a greater proportion of larger unit sizes and houses, although denser development of apartments may be appropriate closer to public transport networks. Part V delivery will be important in delivery a suitable tenure mix, although opportunities for direct social housing delivery will also be appropriate.</i></p> <p>In this context, the Advisory Report prepared by Cushman Wakefield dated February, 2022 and attached as an Appendix to the Statement of Material Contravention included with this planning application, is instructive.</p> <p>Section 4 of the Advisory Report notes that in Blarney there is currently only 17 residential units (14no. houses and 3no. apartments) available to purchase, which, when measured against the population uplift to 7,533 people requiring an additional 2,566 new housing units to 2022, demonstrates how acute the lack of supply in Blarney is. Of this 17no. units, 3no. are 2-bed; 8no. are 3-bed; 5no. are 4-bed; and 1no. is 6-bed, suggesting an underprovision in 1 and 2 bed units. In addition, the report details evidence of demand for housing developments that are currently under construction in the Blarney area, including Barter’s Wood, Cluain Ard, Glenn Rua, Clonlara and Lia Fail, with the 54-unit development (3 and 4 bed units) at Barter’s Wood sold out by November, 2020; Cluain Ard (78no. 2, 3 and 4-bed units) sold out in 2021 over 3 phases; Glenn Rua (28no. 2, 3, 4 and 5-bed units) and Clonlara (144no. 3 and 4-bed units) which has sold out; and Lia Fail (12no. 4-bed units) with only 2no.</p>

	<p>units remaining (as at February, 2022). This evidence confirms the level of demand for new housing in Blarney, particularly for larger houses. In this context, the proposed development, which provides a range of new homes, from smaller ‘starter’ homes to family homes, including 3no. detached, 42no. semi-detached, 60no. terraced houses, and 38no. apartments, consisting of 8no. 1-bed (5%); 38no. 2-bed (27%); and 97no. 3 and 4-bed units (68%) is considered to be appropriate with respect to housing mix, having regard to demand, and the policy environment within which the proposed development is framed.</p>
<p><b>HOU 4-1</b></p>	<p>The gross area of the subject site is c. 7.79ha. Having regard to the zoning objective of the subject site, as well as Appendix B of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), the landscape buffer to the north has been excluded from the calculation of net site area. The local access road is also excluded from the net developable area in compliance with Appendix B of the Guidelines. This reduces the net site area for density calculation purposes to c. 4.1ha., with a corresponding density of 35 units/ha. Noting that a Medium B density of 12-25units/ha applies to the subject site, and having regard to the recent refusal of permission under application register reference ABP- 308156-20, the proposed density may be considered to constitute a material contravention of the BL-R-03 zoning objective that pertains to the subject site. In this respect, a Statement of Material Contravention has been prepared under separate cover. It is noted in HOU 4-1 that densities between 25-35 dwellings/ha will be considered where an exceptional market requirement has been identified. In this respect, and considering the market report prepared by Cushman &amp; Wakefield (2021) (attached as Appendix 3 to this report):</p> <ul style="list-style-type: none"> <li>• Noting that there is a decline in completions and commencements of new builds in 2020 and 2021 arising out of the current pandemic, the report states that between 2020-2025, demand for housing nationwide is likely to be c. 47,000 units/year;</li> <li>• The ESRI report (2020) estimates a longer-term requirement for 33,000 residential units per year, and indicates that the bulk of new homes for smaller households will be needed in locations in or near the main cities, including Cork;</li> <li>• The Housing for All Plan (2021) pledges to deliver 33,450 homes in 2024 and 40,500 a year by 2030.</li> <li>• As Ireland’s average household size converges towards the European average, there will be significant demand for housing for smaller homes i.e., between 1-3 bedroom units;</li> <li>• Blarney is identified as an Urban Town in the draft Cork City Development Plan 2022 as one of 4no. Urban Towns in the city, and the City Capacity Study indicates that the 4 Urban Towns have the largest total area of underutilised and undeveloped land identified.</li> <li>• In the current Cork County Development Plan 2014, Blarney is identified as a Metropolitan Town, with a population target of 7,533 people to 2022 (against a current population of c. 2,500 (2016)), in an additional 2,566 housing units. This population and</li> </ul>

	<p>housing uplift has not been delivered as a consequence of delays in progressing Stoneview for primarily infrastructural reasons. It is noted in the report that other residentially zoned lands, including the subject site, are available in Blarney to achieve the projected population and housing growth. It is also noted that Blarney has a higher than average Labour Force Participation Rate;</p> <ul style="list-style-type: none"> <li>• The report also points out that in Blarney there is currently only 17 residential units available to purchase, which, when measured against the population uplift to 7,533 people requiring an additional 2,566 new housing units to 2022, demonstrates how acute the lack of supply in Blarney is.</li> <li>• In addition, the report details evidence of demand for housing developments that are currently under construction in the Blarney area, including Barter's Wood, Cluain Ard, Glenn Rua, Clonlara and Lia Fail, with the 54-unit development (3 and 4 bed units) at Barter's Wood sold out by November, 2020; Cluain Ard (78no. 2, 3 and 4-bed units) sold out in 2021 over 3 phases; Glenn Rua (28no. 2, 3, 4 and 5-bed units) and Clonlara (144no. 3 and 4-bed units) which has sold out; and Lia Fail (12no. 4-bed units) with only 2no. units remaining (as at February, 2022). This evidence confirms the level of demand for new housing in Blarney.</li> <li>• The report also notes that the mixed use scheme and Primary Care Centre recently permitted under ABP-309152-21 and ABP-308670-20 respectively will result in the provision of additional hotel, café, office, convenience retail and retail services, as well as new employment opportunities for Blarney, underpinning the need for further residential development to sustain and support these new services and employers, and strengthen the built up area of Blarney within the development boundary in line with national, regional and local planning policy for compact, sustainable growth</li> <li>• A May, 2021 Sherry Fitzgerald report found that 83% of first time buyers stated their preference to relocate to a town, village or suburb.</li> <li>• Homeworking will become a permanent feature for many people – in this respect the proposed development provides work from home space where possible.</li> </ul>
<b>HOU 5-1</b>	<p>It is noted that this requirement is superseded by the requirement of 20% social housing. The proposed development will include the provision of 20% social housing, to be transferred to the Planning Authority. A Layout Plan (21_001_P11) prepared by BRH Design Partners identifying the proposed units to be transferred is submitted, as well as a Part V Costs and Methodology Statement prepared by OLS Consulting Engineers.</p>
<b>SC 1-1</b>	<p>The proposed development incorporates 19% public open space. This active open space incorporates the provision of 5 no. Neighbourhood Play Areas, 2 no. multifunctional viewing/seating plazas, 5no. accessible public open space areas are proposed at the heart of the proposed development site, with 4no. pocket open space areas located throughout the site for the enjoyment of all future residents, as well as a proposed woodland belt and wildflower areas throughout the site.</p>

<b>SC 3-1</b>	The proposed development includes the provision of a 42-child creche (309.66m <sup>2</sup> (with 258.8m <sup>2</sup> private open space)) in line with the requirements of the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006, which satisfies this objective.
<b>SC 4-1</b>	As noted, a childcare facility is provided as part of this development.
<b>SC 4-2</b>	A school demand report concludes that the school places demand generated by the proposed development can be accommodated within the existing national and secondary schools in Blarney.
<b>SC 5-2</b>	The provision of public open space is consistent with the relevant planning policy documents.
<b>SC 5-3</b>	The proposed development incorporates 19% public open space. This active open space incorporates the provision of 5 no. Neighborhood Play Areas, 2 no .multifunctional viewing/seating plazas, 7no. Public Open Space areas with level grass kickabout and/or terraced natural play areas, as well as a proposed woodland belt and wildflower areas throughout the site.
<b>SC 5-5</b>	It is considered that adequate provision of recreation and amenity facilities have been provided throughout the site, in line with the Council's Interim Recreation and Amenity policy. A mix of facilities has been provided throughout the site including neighbourhood play areas, wildflower areas, kickabout areas and public plazas with seating.
<b>SC 5-8</b>	The private open space provided is in line with the standards contained in the relevant guidance documents.
<b>TM 2-1</b>	The proposed development includes for improvements to the Sunberry Heights/Drive Road to improve the overall safety and functionality of the road for existing and future motorists, pedestrians and cyclists.
<b>TM 2-2</b>	The proposed development places an emphasis on walking as a more appropriate mode of transport. Where appropriate, shared surfaces have been introduced to ensure that every area of the development is accessible on foot. The streetscape of the proposed development will ensure that the needs of pedestrian, cyclists and those with special mobility needs are met appropriately, in line with the guidance of DMURS.
<b>TM 2-3</b>	As noted above, the subject development seeks to improve pedestrian connectivity through the site as well as providing improved pedestrian connectivity to the wider area.

<b>TM 3-3</b>	A Traffic Impact Assessment has been carried out by NRB Consulting Engineers and is included with this application.
<b>TM 4-1</b>	A shared cycle parking resource has been provided in accordance with the requirements set out in Appendix D. These parking areas have been provided at appropriate locations. Any parking areas provided are located in areas which benefit from passive surveillance and will be landscaped so as to enhance the environment and be respectful of the streetscape. Parking areas will provide for safe and easy access for pedestrian and cyclists.
<b>WS 3-1</b>	In terms of waste water, a Statement of Design Acceptance dated 16 <sup>th</sup> September, 2021 has been received from Irish Water.
<b>WS 5-1</b>	Surface water shall be collected in a series of stormwater drains that will be laid on the estate roads. The drains will collect stormwater arising from roofs and hard-standing areas within the individual properties and stormwater collected on the estate roads via the road gullies. The surface water system shall include attenuation designed for the 1/100 Year event. The principal point of discharge for surface water shall be to an existing stream/watercourse located to the west of the site. Discharge to the existing stream/watercourse shall be at a rate to equal to the greenfield runoff rate to ensure no significant changes in flow in the existing stream/watercourse. Presently there is an open land drain running in a north to south direction within the western boundary of the development site. At the southwest point of the development site, this open land drain joins with a similar land drain from the adjacent property to discharge into an existing watercourse which descends through the wooded area towards the Killowen Road and subsequently towards the R617 Regional Road. The watercourse crosses both roads via precast concrete culvert crossings. For the purposes of this application and predominantly from an environmental perspective, a "worst case" approach has been considered in respect of the necessary remedial works. From an environmental perspective, it has been assumed that the road crossing may have to be replaced in its entirety and all environmental assessment and reporting is based on this "worst case" scenario although it is not envisaged that such extensive remedial works will be required. The second point of discharge for surface water shall be to the existing surface water sewer on Sunberry Drive. This discharge point shall only be used to serve the most south-easterly area of the site which can't be facilitated by the principal discharge due to levels. This point of discharge will accept circa 3.5% of the site runoff and this discharge will be limited to the greenfield runoff rate.
<b>WS 5-3</b>	As above, surface water will be managed appropriately on site.

<b>WS 7-1</b>	Any waste generated by the proposed development will be managed in accordance with best practice.
<b>HE 2-3</b>	The existing hedgerows and trees along the site boundary will be retained and protected where appropriate. All trees to be maintained will be protected appropriately during construction and operation.
<b>GI 6-1</b>	The proposed development has been designed to minimise any adverse impact on the visual and scenic amenities of the local environment. This has been achieved through considered design and siting, the incorporation of appropriate landscaping and the protection of existing landscape features including hedgerows. In addition, the northern section of the site has been left free from development.
<b>GI 7-1</b>	It is noted that there are no protected views in the vicinity of the site.
<b>ZU 3-2</b>	The non-residential use (creche) proposed on site is complementary to the primarily residential nature of the site.

**Table 8 Development consistency with County Development Plan Objectives**

7.3 While not adopted, it relevant to note the provisions of the draft Cork City Development Plan 2022-2028, which

- retains a residential zoning objective for the entire site,
- identifies the lands as Tier 1, to be brought forward for residential use in the short-term,
- is capable of accommodating a residential density of up to 50 units/ha in principle, and
- can support buildings of up to 3 storeys in height.

### Blarney-Macroom Municipal District Local Area Plan (LAP) 2017

7.4 The proposed development site is located within the development boundary of Blarney, which is included in the Municipal District of Blarney-Macroom and is therefore subject to the policies and objectives contained within the Blarney-Macroom Municipal District Local Area Plan, 2017.

7.5 The site benefits from a specific zoning objective BL-R-03, (highlighted in yellow in Plate 8 below) which is outlined as follows:

*Medium B Density Residential Development including detached dwellings, limited to the lower portion of the site. The upper part of the site, closer to the ridge, is generally unsuitable for development and should be retained as open land uses with long term strategic planting as part of the overall scheme.*

7.6 The access road from the R617 is zoned 'Existing Built Up Area', which reflects its established use as a residential access road. This access road connects the proposed development site with the town centre (BL-T-01) to the immediate south.



**Plate 8 Extract from Blarney Land Use Zoning Map**

7.7 It is submitted that, in general terms, the proposed development complies with zoning objective BL-R-03 for the following reasons:

- A residential use is proposed which complies with the residential zoning objective. So too does the proposed creche;
- A mix of dwelling types are proposed, including 3no. detached dwellings, semi-detached, terraced, and apartment units.
- Notwithstanding the fact that there are existing residential uses to the east located closer to the ridge, the proposed development is focused on the lower portion of the site.
- The upper part of the site is kept free from development, is retained as open land uses, and long-term strategic planting is proposed.

- As noted above, the proposed density of 35 units/ha is higher than that supported by the Medium B density range applicable to the site. A Statement of Material Contravention is submitted under separate cover.

7.8 In addition, section 3.2.17 of the LAP states as follows:

*In relation to the BL-R-02 and the BL-R-03 sites, there is no direct access to a public road. Future development proposals on these sites will need to ensure that safe access is provided. This issue will be of particular concern when servicing the BL-R-03 site. Serious consideration should be given, in any proposal on this site, to the following traffic related issues:*

- *The impact of increased traffic at the junction of Strawberry Heights and the R617*
- *The gradient of Sunberry Heights as it approaches the Blarney Inner Relief Road,*
- *Pedestrian and cycling connectivity between the BL R-03 and the town centre.*

7.9 In response to section 3.2.17 of the LAP, as illustrated in Plate 9, the proposed development provides for the following improvements to the Sunberry Heights/Drive to improve the overall safety and functionality of the road for existing and future motorists, pedestrians and cyclists:

- The existing footpath is to be cleared of all impinging vegetation to ensure the existing 1.2m wide footpath is clean and the full width of the path is available.
- There is an existing safety/crash barrier over a short stretch of the road approximately halfway between the R617 junction and the junction to the proposed works. It is proposed that a suitably designed security fence/crash barrier system be installed over the entire length of the estate road on the western side. The security/crash barrier would be the subject of a detailed risk assessment carried out at detailed design stage. This will greatly improve the level of safety to protect all road users using this stretch of the estate road.
- It is proposed to install a Speed Reduction Table at the mid-point on the estate road. This will help to reduce speed on the existing estate road. The Speed Reduction Table will be accompanied by appropriate advance warning signage.
- A raised platform shall be constructed at the junction with the R617. The platform which shall be constructed in accordance with DMURS will greatly improve the safety of the junction for all road users and pedestrians.
- The existing carriageway shall be designated as a shared street in accordance with the National Cycle Manual with new road markings laid down on the carriageway as required.
- The existing estate road carriageway shall be overlaid with a high friction surfacing. This coupled with ongoing maintenance including gritting and salting of the roads during poor weather conditions will improve the overall safety of the estate road.
- The surface water drainage system including drains and gully traps have been cleaned and de-sludged to ensure no surface water ponding or water flow on the surface of the carriageway.

7.10 All works associated with the existing Sunberry Heights Estate Road shall be carried out by the applicant as part of the overall development of the site. The applicant has the legal right to undertake these works. In addition, the applicant is amenable to contributing towards enhanced pedestrian and cycle infrastructure in Blarney if required by the Board.





**Plate 9 Proposed works to the existing access road**

7.11 In relation to the access into the proposed development site, the applicant will undertake the following works:

- Widening of the junction to ensure a minimum carriageway width of 6.0m and footpath widths of 2.0m are achieved at the junction and on the new estate road leading to the proposed development site.
- The widening of the junction will require moving/realignment of the boundary wall of No.1 Sunberry Heights (which is the ownership of the applicant) to ensure adequate road and footpath widths are achieved. The existing garage at this property will also be demolished as part of the works.
- The front boundary wall of No.1 Sunberry Heights will be lowered to ensure the minimum sightline requirements of 45m at a 2.4m setback is achieved at the junction.

7.12 The Transportation Assessment, including independent Road Safety Audit prepared by Bruton Consulting Engineers, has been prepared by NRB Consulting Engineers demonstrates that:

- The proposed development will have an unnoticeable impact on the established local traffic conditions and can easily be accommodated on the road network;
- There are no significant operational traffic safety or road capacity issues affecting the proposed development, the proposed vehicular access or the established road network

7.13 It is submitted that the proposed development fully addresses the issues raised in section 3.2.17 of the LAP in respect of the lands zoned BL-R-03.

7.14 The LAP also outlines several general objectives, and the relevant objectives, as well as the way in which the

proposed development complies with these objectives are outlined below.

Objective GO-01 is outlined as follows:

*Plan for development to enable Blarney to achieve its target of 7,533 persons.*

- 7.15 The proposed development comprises of 143no. of dwellings. CSO data released from the last census notes that the average household size in 2016 was 2.8 people (Cork County). Therefore, the proposed development could potentially increase the population of Blarney by 400no. people. It is submitted that the proposed development will contribute to the achievement of Objective GO-01 of the Plan.

Objective GO-04 relates to services and development and is outlined as follows:

*Provision of adequate water and wastewater infrastructure to service lands and ensure the town achieves its growth targets over the lifetime of the Plan*

- 7.16 A Statement of Design Acceptance dated 16<sup>th</sup> September, 2021 has been received from Irish Water.

Objective GO-05 notes the following:

- a) *Ensure that provision is made in proposals for new development, particularly for housing, office, retail, industrial and educational uses to provide safe, convenient and pleasant pedestrian and cycling routes linking the development to the railway station and other principal areas of the town*
- b) *In achieving this objective, special attention will be paid to the layout of the development to ensure that appropriate measures are taken to establish a walking and cycling friendly environment.*

- 7.17 The proposed development places an emphasis on walking and cycling as a more appropriate mode of transport and seeks to improve connectivity wherever possible. With regard to pedestrians, a network of interconnected footpaths has been provided throughout the development which will improve connectivity and encourage walking and cycling. These footpaths are overlooked by the dwellings, providing for an improved perception of safety throughout the development. These routes aim to improve connectivity through the wider area of Blarney. In order to improve pedestrian connectivity to the town of Blarney a number of road improvements are proposed along the junction of Sunberry Drive and Sunberry Heights, as well as the junction of Sunberry Heights and the R617.

Objective GO-06 in relation to Blarney Castle states as follows:

*Ensure adequate regard is given to assessing the visual impacts of new developments in close proximity to Blarney Castle and Estate so as to ensure that such developments do not compromise the landscape and heritage character of the area.*

- 7.18 The proposed development has been subject to a detailed landscape and visual impact assessment (LVIA) prepared by CSR. In respect of Objective GO-06, the LVIA states that the design strategy for the site includes the following key elements:

- Exclusion of development from the upper part of the site;
- Retention of site boundary vegetation and avoidance of impacts on trees along site boundaries;
- Cut and fill operations to optimise integration of the proposed development in the hillside setting;
- Provision of short, medium and long-term remedial mitigation measures in the form of tree planting across the site, on open spaces, along streets, within gardens and along embankments arising from cut and fill operations. The planting will supplement existing green infrastructure in providing a natural framework within which the development will be integrated as it matures.

In this respect, it is considered that the proposed development complies with Objective GO-06 of the LAP.

- 7.18 Furthermore, the report of John Cronin & Associates concurs with the findings of the LVIA that the proposed development will not compromise the Blarney Architectural Conservation Area or the landscape and heritage character of the area on which the local tourism economy relies, particularly in respect of Blarney Castle and the wider Blarney Castle Estate.
- 7.19 It is also noted that the visual impact of the proposed development in relation to Blarney Castle was closely considered at each design stage under the previous application, register reference ABP-308156-20, and that the Inspector commented that:

*I have considered all of the material before me in relation to the visual and cultural impact that the proposed site has on the vitality and touristic potential of the town as a whole. I am satisfied that even though the proposed development will be visible from the upper reaches of the Castle itself, wider views in and around the town are not noticeable or damaging in any way. With regard to views from Blarney Castle, I notice from the material submitted from various quarters, promoter and detractor alike, that the distant view of the wider landscape will change. However, the changes planned for are no greater than already present east of the site and that the retention of open lands on the upper slopes of this large field preserve the heavily wooded crest of the hill. In this respect the proposed development meets the objectives within the LAP to do with visual impact, heritage and tourism. I see nothing especially out of place in the proposed development, located on lands zoned for development, that would cause a significant visual impact and so I see no reason to refuse permission on these grounds (page 33 of the Inspector's Report ABP-308156-20).*

- 7.20 It is also noted that the mixed-use development and the Primary Care Centre recently permitted by the Board under ABP-309152 and ABP-308670-20 respectively, the Board found that the proposed developments would not seriously injure the character of the nearby Blarney Architectural Conservation Area, and that, in the context of policy objective GO-06 which requires that development does not compromise the landscape and heritage character of the area, the proposed developments were not in material contravention of the local plan and would not compromise the landscape and heritage character of the area.

Objective GO-12 relates to Birds and Habitats and is outlined as follows:

*Development in the town will only be permitted where it is shown that it is compatible with the requirements of the Habitats Directive and the protection of these sites. Protection and enhancement of biodiversity resources within the receiving environment of the town will be encouraged.*

7.21 In respect of EIA, the Screening Report prepared by Doherty Environmental has determined that:

- The project does not fall into any of the classes described in Schedule 5, Part 1 of the Planning and Development Regulations, 2001, as amended. The need for an EIA has therefore not been triggered under the requirements of Schedule 5, Part 1 of the Planning and Development Regulations, 2001, as amended.
- A review of the classes of development listed in Schedule 5, Part 2 was carried out to determine whether the project falls into any of the development classes that are listed in Part 2 and which require an EIA. The project is representative of an infrastructure project and as such particular attention was given to establishing whether or not the project falls under Part 2, Class 10(b)(i) Infrastructure Projects: construction of more than 500 dwelling units. The project comprises a total of 143 no. residential units and therefore does not fall under Part 2, Class 10(b)(i).
- Given that the project will also comprise demolition works associated with the existing garage and boundary walls which are to be removed and lowered in height respectively at 1 Sunberry Drive, attention was also given to establishing whether or not the project falls under Part 2, Class 14 Works of Demolition. The demolition works associated with the project are minor in scale and comprise the demolition of an existing small garage structure and the lowering of a boundary wall which is also small in size. The works involved in the demolition of this structure will be minor and of a short term nature and will not have the potential to result in any significant environmental effects. As such it is concluded that the demolition activities required for the project will not result in significant effects on the environment and as such the requirement for EIA is not triggered under Class 14 from Part 2 of Schedule 5 of the Regulations.
- In light of the above it is clear that the proposed development does not fall under any of the thresholds specified in the Regulations and is therefore a "sub-threshold" development project. The purposes of the screening report is to provide information to assist with a determination as to whether or not the project falls under Part 2, Class 15 of Schedule 5. Class 15 requires EIA for any project listed in Part 2 that does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have a significant effect on the environment, having regard to the criteria set out in Schedule 7.

7.22 A Screening Report for Appropriate Assessment has been carried out by Doherty Environmental Consultants. Only one European Site, the Cork Harbour SPA, was identified as occurring within the potential sphere of influence of the project. The potential for the project to result in effects to special conservation interests bird species and wetland habitats occurring downstream of the project site was screened in during the examination completed in the Screening report. The reason for screening in likely significant effects downstream at key intertidal foraging and roosting locations at the River Lee estuary is based on the existing at risk status of this waterbody and the potential for the project, in the absence of appropriate safeguards, to combine with other projects and land use activities, and contribute to water quality pressures that are undermining the status of this waterbody and the implications polluted water quality has for estuarine mudflat habitats and the waterbird species that rely upon them. The potential for likely significant effects to European Sites cannot be ruled out at the Screening stage and that an Appropriate Assessment of the project is required. Based on this conclusion a NIS has been prepared to inform the competent authority during its Appropriate Assessment of the project and its potential to result in adverse effects to the integrity of the Cork Harbour SPA.

- 7.23 The NIS presents an analysis of the potential for the project to result in adverse impacts to the Cork Harbour SPA. An evaluation of the potential impact of discharges of surface drainage waters has been completed. During the evaluation of potential impacts associated with the discharge of surface drainage waters it was found that, in the absence of mitigation measures, the potential will exist for contaminants to be released from the project site to the Shournagh Estuary and downstream to the Lower River Lee and for negative impacts to intertidal habitats and wetland bird species downstream. A range of mitigation measures have been prescribed in this NIS that aim to avoid the discharge of contaminated surface drainage waters from the project site during the construction phase and operation phase and during works associated with the replacement of a culvert crossing under the Tower Road R617. These mitigation measures have been evaluated and reference has been made to their successful implementation for other similar development projects in the vicinity of the project site and the River Lee within Cork City. It has been concluded that, provide all mitigation measures that aim to avoid the discharge of contaminated surface drainage waters are implemented, the potential for this impact to occur will be eliminated and associated adverse impacts to the Cork Harbour SPA will not arise.
- 7.24 Based upon the information provided in this NIS, it is the considered view of the authors of the NIS that it can be concluded by An Bord Pleanála that the project will not, alone or in-combination with other plans or projects, result in adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.
- 7.25 The EclA prepared by Doherty Environmental Consultants indicates that for the construction phase:
- There will be a loss of areas of arable land and scrub within the project site. Each of these habitats occurring within the project site has been evaluated as being of low nature conservation importance (Rating E). The loss of these habitats to the footprint of the project will represent a high magnitude impact to these habitats. A high magnitude impact to these habitats of low nature conservation value will represent an impact of minor negative significance.
  - There will be no loss of hedgerow and treeline habitat along the western and northern field boundaries and there will be not loss of woodland habitat to the south of the project.
  - There will be no loss of freshwater habitats as a result of the project.
  - Construction phase measures will be incorporated into the project to eliminate or minimise the potential for the discharge of polluting substances to watercourses downstream of the project site during the construction phase.
  - The project will not have the potential to result in significant disturbance to non-volant terrestrial mammals.
  - There will be no physical loss of high value bat foraging habitat during the construction phase of the project. There will be a loss of areas of immature scrub occurring along the southern boundary of the project site. The loss of this habitat will represent a minor negative impact to the bat foraging habitat occurring within and adjacent to the project site.
  - There will be no loss of habitat for the slug *Tandonia rustica*, which is of vulnerable conservation status. This species has been recorded in the woodland habitat to the south of the project site and is restricted to this habitat. The project will not result in any loss or disturbance to the woodland habitat upon which this species relies.
  - The vegetation to be lost within the project site is of low value to bird species and there will be minimal loss of bird foraging habitat as a consequence of the proposed development. All hedgerow and woodland field

boundaries to the north, west and south of the project site will be retained. The immature scrub habitat that has developed along the southern boundary of the project site provides some nesting habitat for breeding birds and the loss of this habitat will represent a low magnitude impact to the conservation status of breeding bird populations in the surrounding area and an effect of minor significance.

7.2.6 The EclA prepared by Doherty Environmental Consultants indicates that for the operational phase:

- The operation phase of the development will not result in any loss of woodland habitats bounding the project site.
- The operation phase will not result in the loss or disturbance of broad-leaved woodland habitat to the south of the project site.
- There will be no loss of freshwater habitats as a result of the project.
- The operation phase of the project is not predicted to have the potential to result disturbance to protected terrestrial non-volant mammals or bird species.
- Bat species occurring in the vicinity of the project site are known to be sensitive to artificial lighting. The project has been designed to minimise disturbance from artificial night time lighting to the existing boundary vegetation associated with the hedgerows, treelines and woodland.
- Given the design of the project site and the restricted access to the woodland habitat to the south of the project site, the operation phase is not predicted to have the potential to result in disturbance to habitat upon which the vulnerable species *Tandonia rustica* relies.

7.2.7 The EclA prepared by Doherty Environmental Consultants sets out the following mitigation measures:

#### **Measures to mitigate impact on habitats**

Habitat disturbance during construction work will be confined strictly to within the direct land-take of the proposed scheme.

Construction machinery will be restricted to site roads and the footprint of the proposed scheme.

Tree planting will be undertaken within the project site. The landscaping design proposes to plant additional specimen and small/medium woodland trees along the northern boundary of the proposed project layout. The specimen woodland trees and small/medium woodland trees will include native species such as *Quercus petraea*, *Betula pendula*, *Corylus avellana*, *Alnus glutinosa*, *Sorbus acuparia* and *Pinus sylvestris*. The enhancement tree planting will augment the extent of woodland habitat occurring within the footprint of the project site and will provide additional foraging habitat for birds and bats.

An area of land between the northern boundary of the net developable area of the project site and the northern boundary of the project site will remain undeveloped. The width of this area will be up to approximately 95m in places. This area of undeveloped land within the project site will be managed as meadow grassland. A native, species-rich seed mix suitable for neutral to acid soils will be sown in this area of the project site prior to the completion of the construction phase. The seed mix will include yellow rattle (*Rhinanthus minor*) which is a particularly useful species for meadow grassland as well as a mix of native wildflowers that provide foraging for pollinators. The meadow grassland will be managed as a

species-rich hay meadow grassland throughout the operation phase of the project. This initial years during the establishment of the hay meadow are likely to require frequent mowing given the past use of this area for the growth of arable crops and the likely high nutrient content in the soils. During this time the meadow grassland will be managed as a short-cut meadow (with mowing every six weeks) during the growing season for the first two years of the operation phase. Following this and once a species-rich wildflower meadow becomes established it will be managed as a hay meadow with one annual cut at the end of the growing season in September/October. The mowing regime during the establishment of the hay meadow and during the annual cut once established will be based on a cut and lift mowing regime with all cut plant material being removed from the meadow and disposed of off-site.

The provision of a pollinator friendly species-rich hay meadow in the undeveloped area to the north of the net developable area will have the potential to result in a positive impact for local biodiversity. The provision of a semi-natural grassland habitat within woodland habitats to the north and south will provide a mix of habitats that have the potential to function as a high value foraging resource for birds, bats and non-volant mammals as well as a variety of invertebrate species. The provision of semi-natural guidelines habitat and native woodland habitat along the northern boundary of the net developable area will have the potential to result in an overall net increase in the area of semi-natural habitats occurring within and bounding the project site and will offset the loss of any habitats, such as arable land and immature scrub, to the footprint of the project.

### **Management of Wastewater**

All wastewater generated during the operation phase will be directed to the Irish Water sewer network and then to the existing Irish Water Wastewater Treatment Plant (WWTP). Irish Water and Cork City Council have confirmed that sufficient capacity is available at the WWTP to treat any additional loads generated by the project.

### **Management of Surface Water**

In order to minimise the potential for pollution to surrounding surface waters the proposed approach to surface water management as outlined in Section 1.3 above will be implemented in full.

The construction management of the site will take account of the recommendations of the CIRIA guides *Control of Water Pollution from Construction Sites* (2001) and *Control of Water Pollution from Linear Construction Projects* (2006) and Inland Fisheries Ireland's (IFI's) *Requirements for the Protection of Fisheries Habitat during Construction and Development Works*.

During construction key requirements for the prevention of perturbations to surface water quality will include:

- The open land drain that is to be constructed to the north of the net developable area shall be installed as the first item of works of the construction phase. This will provide for a "catch-drain" to the north of the project site during the construction phase and minimise the runoff, from sloping ground to the north of the developable area, over the footprint of the construction site. The clean

surface water runoff collected in the catch drain will be directed to the west to an existing field drain and will be allowed to drain along the field drain to the south.

- Storage – all equipment, materials and chemicals will be stored away from any watercourse. Chemical, fuel and oil stores will be sited on impervious bases and within a secured bund of 110% of the storage capacity, within the lay down area;
- Any excavations to be stored on site will be stored in a designated stockpile area located in the construction site compound or other suitable location on site for the storage of segregated wastes prior to their transport for recovery/disposal at suitably licensed/permitted facilities. Topsoil will be stockpiled on site for reuse in soft landscaping and will be stored separately to subsoils. Stockpiles will be graded to a <1:4 profile. Stockpiles will be covered with plastic sheeting during wet weather and a temporary berm will be constructed around the stockpile area to prevent runoff to watercourses or drainage channels. Excess inert spoil material, not to be reused on site, will be transported off site for deposition. All waste spoil material arising from the construction phase will be inert, non-hazardous spoil material and will be disposed at an approved facility.
- Any stockpiles of spoil or waste material generated from the construction process is to be temporarily stored at a remote distance (i.e. greater than 50m) from the un-named minor stream to the southwest of the project site or the field drain along the western boundary of the project site and will be separated from any drainage channels associated with the construction phase surface water management system by a minimum of 25m, before being removed to an accepting licensed waste disposal facility.
- Waste material arising on site during the construction phase will be managed in accordance with the waste management hierarchy detailed in the Construction Environmental Management Plan (CEMP) prepared for the project and provided under separate cover.
- As fuels and oils are classed as hazardous materials, any on-site storage of fuel/oil, all storage tanks and all draw-off points will be bunded (or stored in double-skinned tanks) and located in the dedicated site compound. Provided that these requirements are adhered to and site crew are trained in the appropriate refuelling techniques, it is not expected that there will be any fuel/oil wastage at the site.
- Oil and fuel stored on site for construction should be stored in designated areas. These areas shall be bunded and should be located away from surface water drainage and features.
- The integrity and water tightness of all the bunding structures and their resistance to penetration by water or other materials stored therein shall also be tested and demonstrated.
- All fuel oil fill areas will have an appropriate spill apron.
- Vehicles and refuelling – standing machinery will have drip trays placed underneath to prevent oil and fuel leaks causing pollution. Where practicable, refuelling of vehicles and machinery will be carried out on an impermeable surface in designated areas, well away from any surface watercourse and surface water drains;
- Maintenance – maintenance to construction plant will not be permitted on site, unless vehicles have broken down necessitating maintenance at the point of breakdown. All necessary pollution prevention measures will be put in place prior to commencement of maintenance in this instance;
- Concrete - Wet concrete operations would not be carried out within watercourses or adjacent to watercourses or surface drains. Runoff from wastewaters or contaminated storm water will be directed to drains installed as part of the surface water management plan;



- Weather conditions and seasonal weather variations will also be taken account of when planning excavations, with an objective of minimizing soil erosion.
- Concrete batching will take place off site or in a designed area with an impermeable surface.
- Concrete wash down and wash out of concrete trucks will take place off site or in an appropriate facility.
- A designated impermeable cement washout area will be provided. The washout area will be located within the project site at a remote distance (i.e. greater than 50m) from the un-named minor stream to the southwest of the project site and will be separated from any drainage channels associated with the construction phase surface water management system by a minimum of 25m.
- A silt fence will be erected on site to prevent the release of silt-laden waters to the minor stream or woodland to the south of the project site. The silt fence will be implemented prior to the commencement of construction and will remain in place throughout the construction phase. The silt fence will be maintained in line with the requirements detailed in the accompanying CEMP throughout the construction phase. The location of the silt fence to be installed is shown on Figure 6.1.
- Any in-situ concrete work to be lined and areas bunded (where possible) to stop any accidental spillage.
- All new infrastructure is to be installed and constructed to the relevant codes of practice and guidelines.
- All surface water infrastructure is to be pressure tested by an approved method during the construction phase and prior to connection to the public networks, all in accordance with Local Authority Requirements.
- Connections to the public network are to be carried out to the approval and / or under the supervision of the Local Authority prior to commissioning.

All new sewers are to be inspected by CCTV survey post construction; to identify any possible physical defects for rectification prior to operational phase.

- The worst-case scenario works to the culvert along the Tower Road R617 will be completed in line with the details outlined above and the accompanying Engineers Report (provided under separate cover). The approach to these works will ensure that the new replacement culvert is installed under dry conditions with contact to the existing minor stream waters being avoided. Only after the new culvert is in place will the stream be connected to the newly installed culvert. This will ensure that the potential for pollution to these waters as a result of the culvert installation is eliminated.
- Care will be required for the environmental management of the site to ensure that no potential contamination issues are experienced.
- Mess, sanitation and welfare facilities will be required during construction and will be located at the construction compound. Foul effluent will make use of chemical facilities with periodic removal for offsite disposal.

Surface water generated at the project site during the operation phase will be discharged via the operation phase surface water management system. The surface water management system has been designed to capture surface water generated at the project site and discharge water at greenfield runoff rates. A suitable level of surface water attenuation has been catered for within the management system. Following

attenuation and prior to release all surface water will be treated via a combine silt and hydrocarbon interceptor so that only treated surface water is discharged to the receiving stream and storm water network.

The provision of these design features will ensure that surface water emitted from the project site during the operation phase is adequately treated and will eliminate any risk of polluted surface water being discharged from the project site during operation.

### **Measures to Reduce the Spread of Invasive Species**

Stands of *Buddleja davidii* occurring within the project site will be cut and removed from the project site outside the seed bearing season, between the months of December and May. This will prevent the spread of this species during vegetation removal.

All plant and equipment employed on the construction site (e.g. excavator, footwear, etc.) must be thoroughly cleaned down using a power washer unit prior to arrival on site to prevent the spread of invasive plant species such as Japanese knotweed, Rhododendron and Himalayan Balsam.

All works during the construction phase will be carried out in accordance with the following guidelines:

- Guidelines on the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads (NRA, 2010);
- NRA (2008). Guidelines for the Management of Waste from National Road Construction Project. National Roads Authority;
- Biosecurity protocols available for aquatic and riparian species available on the Control of Aquatic Invasive Species and Restoration of Natural Communities in Ireland (CAISIE) [www.caisie.ie](http://www.caisie.ie), and
- All maintenance operators will carry out their works under the guidance of the Inland fisheries Ireland Biosecurity Protocol for Field Survey Work. (2011) to ensure no negative impacts are caused to other watercourses. <http://www.fisheriesireland.ie/fisheries-research-1/73-biosecurity-protocol-for-field-survey-work-1>.

### **Measures to Control Light Spill & Night Time Illumination**

The following measures will be incorporated into the lighting design for the project so that night time illumination is minimised along the western, northern and southern boundaries of the project site:

- No street lighting will be installed adjacent to the western, northern and southern boundaries. The southern and western boundaries will be abutted by the rear gardens of proposed dwellings. This design approach will ensure that no street lighting occurs along these boundaries. An area of meadow grassland will be set aside along the northern boundary of the net developable area of the project site. The meadow grassland will be retained between the net developable area and the northern boundary of the project site. In addition woodland and parkland tree planting will be provided along the northern boundary of the net developable area. The provision of the woodland and parkland tree planting and the meadow grassland buffer will provide a buffer between the developable area of the northern hedgerow field boundary and will ensure that this field boundary is

not illuminated at night by the project. In addition it is noted that the provision of the meadow grassland and the additional woodland and parkland tree planting bounded the northern boundary of the developable area will have the potential to enhance the footprint of potential foraging habitat for nocturnal species such as bats. Furthermore the proposed woodland planting that will be provided as part of the landscape plan along the northern boundary of the developable area will also be kept free from elevated night time lighting so as to enhance the potential for this new habitat on site to function as foraging habitat for bats. The associated lighting plan (provided under separate cover) illustrates the lighting contours and the position of this proposed woodland habitat outside the 1 lux lighting contour. The provision of this new woodland habitat as well as the meadow grassland habitat to the north will have the potential to result in an overall net increase in the extent of potential bat foraging habitat within the project site.

- Along the southern boundary of the project site the project has been designed to minimise the potential for light spill and illumination of the edge of woodland habitat to the south. The back gardens of residential houses will buffer the houses from the southern boundary and will by design eliminate the requirement for public lighting to the rear of the houses. Similarly no public lighting will be provided to the rear of the apartment buildings towards the western side of the southern boundary. In addition, a continuous treeline of Koster columnar oaks will be provided as part of the landscaping of the site to the south and rear of the apartment buildings. This tall growing tree, which reaches heights of approximately 15m, will provide for a screening tree line to the south of the apartment buildings, thereby minimising the potential for light spill from the apartment building and south facing windows to the woodland edge. The Koster oak will be planted as semi-mature trees. The establishment of the treeline will provide for a sheltered corridor between the treeline and the woodland edge to the south, which in itself will provide ideal foraging habitat for bats.
- The spacing between lights along access roads will be maximized to reduce light intensity.
- In order to reduce light spill, street lighting will be directed to areas only where it is needed. The upward spread of light above the horizontal plane will be avoided by installing low beam angle lights, less than 70 above the horizontal plane and baffling light columns.
- Blue-white short wavelength lights will not be used on site; and
- Lights with a high UV content will be avoided. Instead narrow spectrum lighting with a low UV content will be used on site.
- Low intensity lighting will be used on site.

The above measures have informed the development of the proposed lighting design for the project site. These measures are in line with best practice recommendation of minimizing the impact of artificial lighting to bats, as outlined by the Institute of Lighting Professional's Guidance Note *08/18 Bats and Artificial Lighting in the UK* (ILP, 2018); the Bat Conservation Ireland in their 2010 guidance document *Bats and Lighting: Guidance Notes for Planners, Engineers, Architects and Developers* and Bat Conservation Trust in their 2008 guidance document *Bats and Lighting in the UK – Bats and the Built Environment*.

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## Evaluation and Residual Impacts

The mitigation measures outlined above for the construction and operation phase of the project are taken from established best practice guidelines that have been successfully implemented for a wide range of project-level infrastructural developments. These measures have undergone extensive and rigorous monitoring for their effectiveness at development sites where they have previously been applied to ensure adverse environmental impacts are avoided.

The results of this monitoring and the recommendation of these measures as standard best practice guidelines is based upon their high degree of success in ensuring negative environmental impacts are avoided.

No high-value habitat receptors have been identified within the project site and the loss of these habitats will represent at most a negligible residual impact.

A range of construction phase and operation phase design measures have been formulated and will be implemented in order to avoid or minimise to an insignificant risk, the potential for negative impacts to the minor stream and the River Martin to the south of the project site. The implementation of these measures will ensure that the project does not result in any potential significant negative residual impacts to these aquatic receptors.

The principal risks associated with the project relate to disturbance to fauna associated with the boundary woodland habitats during the construction and operation phase.

A sensitive design approach has been adopted for the development so that impacts to these boundaries and their potential to support fauna is minimised. The implementation of these measures will ensure that likely significant effects to fauna are avoided and that these boundaries will continue to have the potential to support fauna.

## 8.0 CONCLUSION

- 8.1** This statement demonstrates that the proposed development which involves the provision of a much needed mix of new dwellings on zoned and serviced land within the development boundary of Blarney town, close to existing amenities, community and educational facilities and a half-hourly City bus service is generally consistent with national, regional and local planning policy, including the National Planning Framework (NPF) 2018, Housing for All, 2021, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009 and associated Urban Design Manual, Delivering Homes, Sustaining Communities 2008 and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities, Design Manual for Urban Roads and Streets 2013, Apartment Guidelines 2018 as amended, the Regional Spatial and Economic Strategy for the Southern Region 2020, the Cork County Development Plan 2014, and the Blarney Municipal District Local Area Plan 2017. The key provisions of the draft Cork County Development Plan 2022-2028 are also taken into consideration.
- 8.2** A Statement of Material Contravention is included with the application to address the proposed density (35 units/ha) relative to the BL-R-03 zoning objective applicable to the site, which supports a Medium B residential density within the range of 12-25 units/hectare. The proposed development equates to a density of 35 units/hectare. It is submitted that there is sufficient justification for An Bord Pleanála to grant permission for the proposed development even if the Board consider that the proposal materially contravenes the zoning objective BL-R-03 in respect of the proposed density of 35 units/hectare.
- 8.3** From a layout and landscaping perspective, the proposed development has been designed to minimise any adverse impact on the visual and scenic amenities of the local environment. This has been achieved through considered design and siting, the incorporation of appropriate landscaping and the protection of existing landscape features including hedgerows. In addition, the northern section of the site has been left free from development, and enhanced by strategic tree planting. The proposed development will not compromise the Blarney Architectural Conservation Area or the landscape and heritage character of the area on which the local tourism economy relies, particularly in respect of Blarney Castle and the wider Blarney Castle Estate.
- 8.4** From a transportation perspective, the proposed development will have an unnoticeable impact on the established local traffic conditions and can easily be accommodated on the road network. In addition, there are no significant operational traffic safety or road capacity issues affecting the proposed development, the proposed vehicular access or the established road network.
- 8.5** From an environmental perspective, no high-value habitat receptors have been identified within the project site and the loss of these habitats will represent at most a negligible residual impact. A range of construction phase and operation phase design measures have been formulated and will be implemented in order to avoid or minimise to an insignificant risk, the potential for negative impacts to the minor stream and the River Martin to the south of the project site. The implementation of these measures will ensure that the project does not result in any potential significant negative residual impacts to these aquatic receptors. The principal risks associated with the project relate to disturbance to fauna associated with the boundary woodland habitats during the construction and operation phase. A sensitive design approach has been adopted for the development so that impacts to these boundaries and their potential to support fauna is minimised. The implementation of these measures will ensure that likely significant effects to fauna are avoided and that these boundaries will continue to have the potential to support fauna.

- 8.6** It is also the considered view of the authors of the NIS that it can be concluded by An Bord Pleanála that the project will not, alone or in-combination with other plans or projects, result in adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion.
- 8.7** It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this residentially zoned site, within the development boundary of Blarney, within the expanded City, in close proximity to existing services and facilities, including public transport. It is concluded that the proposed development is consistent with the proper planning and sustainable development of the area.
-

## Appendix 1

### Minutes of Section 247 Consultation (Cork City Council)

Strategic Housing Development at Monacnapa, Blarney, Co. Cork – 147 houses and creche.

A formal Section 247 consultation was held with Cork City Council on the 17/02/2021. The minutes of the meeting are set out below:

<b><u>In Attendance</u></b>	
Michelle Delaney (Development Management)	CCC
Melissa Walsh (Development Management)	CCC
Adrienne Rogers (Development Management)	CCC
Ronan McKiernan (Planning Policy)	CCC
Valerie Fenton (Development Management)	CCC
Cathy Beecher (Traffic)	CCC
Pat Ruane (Conservation Officer)	CCC
Tony Duggan (City Architect)	CCC
Liam Casey (Parks)	CCC
Dennis O'Regan (Area Engineer)	CCC
Kevin McGill (Environment)	CCC
Alison O'Rourke (housing/property)	CCC
Eoin Sheehan	Applicant
Niall Sheehan	client advisor
Aiden O'Neill	Coakley O'Neill: planner
Alannah Hurley	Coakley O'Neill: planner
Martin Byrne	BRH Design Partners: architect
Dorothy Lynch	CSR: landscape architect
Fachtna Sheehy	OLS Consulting Engineer: engineer
Eoin Reynolds	NRB: traffic and transportation

A presentation was given by the planning agents on behalf of the applicant. A site layout plan was provided.

The following information was advised by CCC.

#### Planning Policy/Development Management

- The order from An Bord Pleanála in respect of the previous SHD application was noted.
- The proposed development materially contravenes the land use zoning.

- The land-use zoning is considered reasonable.
- The proposed density is too high and in contravention of the zoning.
- The site is highly constrained due to its topography and limitations around access. Permeability and connectivity with the town centre is poor.
- There is a contour above historic treeline to the south of the site, and there is an established tree-line along western boundary. These should be respected, and structures set back accordingly.
- The sites zoning is currently Medium B and as such entertaining a higher density is premature pending the outcome of CMATs proposals, in essence whether Blarney gets a high frequency bus service or not will determine if the site is Tier 1 or Tier 2. The de-zoning of the site is not envisaged but its short term developability is still unclear. If the current frequencies are not improved dramatically then the opportunity of Modal Shift in Blarney will not arise. This is particularly pertinent to this site if they are relying on PT to reduce parking provision, without PT improvements a necessity for increased parking will arise.
- There is no permeability proposed to the town centre, schools or neighbouring estates, the statement of consistency makes no reference to the Permeability Best Practice Guidelines.
- The layout is somewhat monolithic is not sympathetic to the topography of the site, how each of the character areas relate to each other is unclear. The positioning of gables overlooking the roads and open space is unacceptable, a more sensitive treatment of corners is needed to allow for a more calming effect on the roads and better supervision of open space.
- The position of the apartments is questionable and the amenities of these is again questionable.
- Blarney although under the jurisdiction of Cork City Council cannot really be considered Cork City, it is a distinct CSO settlement and therefore different criteria apply notably NPO 3 (c) of the NPF.

#### Drainage

1. There should be a survey of the drainage route from the site boundary, through third party lands, and down through the various culverted sections under the Kilowen Rd and the R617 (St Ann's Rd)? Previous observations have indicated that the Applicant's site does not have connectivity to the drainage through the third party lands as indicated at the southwest corner of the site. This has serious implications for the viability of the drainage proposals and must be clarified before the design can progress any further. There are also concerns about the elevation drop through these lands and the potential flow velocities and associated scouring which could occur...the Applicant shall address this also.
2. We will require an estimate of the volumes of intercepted storm water run-off entering the site's network, coming via overland flow from the land to the north. The Applicant previously identified a cut off drain here, but the estimate of run-off quantities that will ultimately reach the site network and hence be discharged via the outfall mentioned in Item 1 above needs to be provided.
3. There is a large amount of cutting and filling. We will require much more site investigation to identify groundwater table levels and potential impacts on that. Prior to submission of the application the Applicant will need to complete trial pits and boreholes throughout the site and where groundwater is discovered, an assessment of the likely seepage that will occur and hence enter the storm water system will be required.
4. The Application will also need to identify how seepage will be managed as it interacts with retaining structures (i.e. back of wall drainage) and embankments (i.e. cut-off drain / filter drain at the embankment toe).
5. There was no SuDS proposals submitted first time around...a site of this nature needs to consider a SuDS based approach.

#### Parks

Refer to previous assessment in recent SHD application. General scheme is acceptable.



### Conservation

Refer to previous assessment in recent SHD application.

### Traffic & Movement, Accessibility

Most points were raised in previous traffic reports in recent SHD application previously and should also include the following:

- The TTA needs to be more robust and in line with the TII guidelines especially in terms of validating the trip rates used against existing similar developments/sensitivity analysis etc
- TTA needs to include an opening year +5 yr forecast in line with TII guidelines
- Modal shift assumptions need to be included

Overall, there needs to be a correlation between the TTA and how the use of active travel measures are being encouraged. The approach seems to be that if the traffic impact is low then that's ok but what we need to see is how is this development not centred around car based travel which is a challenge given the topography of the site and the poor pedestrian infrastructure from the site to the essential services in the village such as the school.

### Urban & Street Design

Refer to previous assessment in recent SHD application. There are significant gaps in the receiving pedestrian network which will need to be addressed given the scale of the development, the intensification of use of the existing pedestrian network and the applicants ambitions to achieve their forecasted modal shift. Currently, there is no continuous, contiguous pedestrian network from the applicant's site to link the development with public transport services and the existing educational facilities, this includes a primary school. The lack of connectivity is one of the key factors that discourage people from walking. While these are outside the red line boundary, it is considered appropriate that these works are provided by the applicant at the applicant's expense as part of the site development works and/or as part of a special contribution.

Without these interventions, the applicant is proposing a car centric development, heavily reliant on driving the private car to undertake trips, including those less than 2km, from the development.

### Archaeology

To refer to previous assessment in SHD application. The city architect is available if there are further queries.

### Environment

Clarification is sought around approach to managing the waste for the individual units.

### Part V

As per previous application.

### Conclusion

The site is highly constrained. There are a number of unresolved issues around the servicing the site, (drainage, access, junction design and permeability) and the proposed development is a material contravention of the zoning of the site.

## Appendix 2

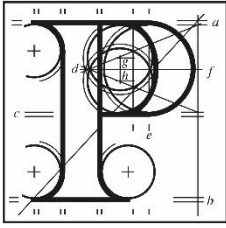
List of Objectives and Guidelines considered in Statement of Consistency.

<b>Statements of Consistency – Listed Objectives/Guidelines Considered</b>	
<b>Development Plan</b>	<b>Description of objective</b>
Objective CS 3-1	Network of Settlements: Higher Order Settlements Gateway, Hub and Main Settlements
Objective CS 4-1	County Metropolitan Cork Strategic Planning Area
Objective HOU 3-1	Sustainable Residential Communities
Objective HOU 3-2	Urban Design
Objective HOU 3-3	Housing Mix
Objective HOU 4-1	Housing Density on Zoned Land
Objective HOU 5-1	Reserved Land for Social Housing
Objective SC 1-1	Social and Community Infrastructure Provision
Objective SC 4-1	Educational Facilities
Objective SC 4-2	Provision of Educational Facilities in Large Residential Developments
Objective SC 5-2	Quality Provision of Public Open Space
Objective SC 5-3	Provision of New Recreation and Amenity Facilities
Objective SC 5-5	Recreation and Amenity Policy
Objective SC 5-8	Private Open Space Provision
Objective TM 2-1	Walking
Objective TM 2-2	Cycling
Objective TM 2-3	Bus Transport
Objective TM 3-3	Road Safety and Traffic Management
Objective TM 4-1	Car and Cycle Parking
Objective WS 3-1	Wastewater Disposal
Objective WS 5-1	Surface Water and SuDS
Objective WS 5-3	Surface Water Management
Objective WS 7-1	Waste Management
Objective HE 2-3	Biodiversity outside Protected Areas
Objective GI 6-1	Landscape
Objective GI 7-1	General Views and Prospects
Objective ZU 2-1	Development and Land Use Zoning
Objective ZU 2-2	Development Boundaries
Objective ZU 3-2	Appropriate Uses in Residential Areas
Table 1a of Appendix D	Car Parking Requirements for New Development (Maximum per sq.m)
Table 2 of Appendix D	Cycle Parking Requirements for New Development
<b>Blarney – Macroom Municipal District Local Area Plan 2017 ,</b>	
BL-R-03	Specific Zoning Objective
Objective GO-01	Target Population
Objective GO-04	Provision of Water and Wastewater Infrastructure
Objective GO-05	Walking and Cycling Environment
Objective GO-06	Visual Impact of Development in Close Proximity to Blarney Castle
Objective GO-12	Birds and Habitats
<b>Ministerial Guidelines and Strategic Policy Considered</b>	
Project Ireland 2040 - National Planning Framework;	
Southern Regional Assembly - Regional Spatial & Economic Strategy (RSES): Initial Public & Stakeholder Consultation Issues Paper	
Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)	
Sustainable Urban Housing Design Standards for New Apartments (2018)	
Urban Design Manual – A Best Practice Guide	
Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines- Quality Housing for Sustainable Communities	
Quality Housing for Sustainable Communities (2007)	
Design Manual for Urban Roads and Streets (2013)	
Guidelines for Planning Authorities on Childcare Facilities (2001)	
Smarter Travel – A New Transport Policy for Ireland (2009-2020)	
The Planning System and Flood Risk Management (2009)	
Birds and Habitats Directive – Appropriate Assessment	

### Appendix 3

Record of the Tripartite Meeting  
Inspector's Report  
Board Opinion





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## Record of Meeting ABP-310013-21

<b>Case Reference / Description</b>	Demolition of existing garage and southern boundary wall, construction of 143 no. residential units (105 no. houses, 38 no. apartments) creche and associated site works. Monacnapa, Blarney, Co. Cork.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	18 <sup>th</sup> June 2021	<b>Start Time</b>	10:00 a.m.
<b>Location</b>	Via MS Teams	<b>End Time</b>	10:50 a.m.
<b>Chairperson</b>	Tom Rabbette	<b>Executive Officer</b>	Hannah Cullen

### Representing An Bord Pleanála:

Tom Rabbette, Assistant Director of Planning
Elaine Power, Planning Inspector
Hannah Cullen, Executive Officer

### Representing Prospective Applicant:

Eoin Sheehan, Applicant
Niall Sheehan, Applicant's advisor
Martin Byrne, BRH Design Partners
Fachna Sheehy, OLS Consulting Engineers
Jim Kelly, Cunnane Stratton Reynolds
Eoin Reynolds, NRB Consulting Engineers
Aiden O'Neill, Coakley O'Neill Town Planning Ltd

### Representing Planning Authority

Michelle Delaney, A/ Senior Executive Planner
Simon Lyons, Senior Executive Engineer
Cathy Beecher, Senior Executive Engineer
Denis O'Regan, Executive Engineer

## **Introduction**

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made. The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public once the Opinion has issued,
- ABP received a submission from the PA on 19<sup>th</sup> May, 2021 providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000 as amended and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated 22<sup>nd</sup> April, 2021 formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted. Recording of the meeting is prohibited.

## **Agenda**

- 1. Design Strategy – (Density, Design and Layout, Topography, Residential Amenity, Housing Mix, Materiality, Phasing)**
- 2. Open Space**
- 3. Visual Impact - Blarney Castle**
- 4. Transportation and Accessibility**
- 5. Water Services - Drainage**
- 6. Any Other Matters**

## **1. Design Strategy – (Density, Design and Layout, Topography, Residential Amenity, Housing Mix, Materiality, Phasing)**

### **ABP Comments:**

- Permission was previously refused on this site (ABP 308156-20) . The reason for refusal considered that the proposed density was a material contravention of the development plan and the applicant had not submitted a material contravention statement. A clear rational and justification for the proposed density is required having regard to the sites Objective BL-R-03, the previous refusal on the site (ABP-308156) and national guidance.
- Rational for the proposed apartment design and layout, in particular the northern aspect of the living spaces and southern aspect of the bedrooms in some units.
- Query the stated quantity of dual aspect units within the scheme. True dual aspect units significantly add to the light entering the unit and assist with ventilation.
- Justification for the housing mix.
- Consideration of the materials and finishes having regard to the elevated nature and highly visible location of the site.
- Rational of how the public open spaces relate to the proposed phasing.

### **Prospective Applicant's Comments:**

- A material contravention has been submitted with the documentation to satisfy the Board in addressing the previous refusal item. The proposed density is considered appropriate at this location and having regard to national guidance.
- The design and layout of the apartment blocks has addressed concerns raised in the previous application.
- The design and layout of the dwellings have addressed concerns raised in the previous application and a number of units have been omitted to allow for a revised layout, in particular along the site's eastern boundary.
- A report addressing the demand for housing within the area has been provided. There is currently a requirement for additional housing.
- The proposed materials and finishes are of a high standard and would provide a distinctive character for the site.
- The phasing of the open space provision will be reconsidered.

### **Planning Authority's Comments:**

- The proposed scheme materially contravenes the zoning objective of the lands, further matters on this item have been addressed in the PA report submitted to the Board.

## **2. Open Space**

### **ABP Comments:**

- The concerns raised by the PA regarding the staggered nature of the rear private open space of the dwellings should be considered.
- Clarity is required regarding the use and maintenance of the public open space located on the northern elevated part of the site area
- Consideration of the potential impact on hedgerows and trees provided within private rear gardens. The potential loss of hedgerows and trees should be fully addressed.

**Prospective Applicant's Comments:**

- The northern area of the site is not currently public open space. It is not proposed to include it as public space. The layout includes an access to this portion of the site for maintenance / grass cutting. This area would be further planted as part of the development of the site and would be maintained by a management company.
- The impact on hedgerows and / or trees within the private rear gardens of dwelling will be addressed in the application.

**Planning Authority's Comments:**

- The parks department have recommended planting groups of mature tree's further details can be found within the PA report submitted to the Board.

**3. Visual Impact - Blarney Castle****ABP Comments:**

- The applicant should address/respond to the PA's concerns highlighted in their report in relation to views from Blarney Castle and provide requested cross sections. The importance of Blarney Castle and its setting is acknowledged, and it is noted that this issue was addressed in detail in the previous application.

**Prospective Applicant's Comments:**

- The scheme has been designed to ensure it does not have any adverse impacts on the setting of Blarney Castle.
- Cross sections are included in the landscaping drawings. There is no objection to including this detail in the architectural drawings.
- All trees to be retained on site would be protected during the construction phase. Details have been included with the submission.

**Planning Authority's Comments:**

- The parks departments report on the previous application (ABP 308156-20) is noted and should be taken into consideration as it still stands.
- Objective GO-06 of the Local Area Plan relates to visual impacts of developments in close proximity to Blarney Castel to ensure they do not compromise the landscape heritage character of the area. This objective should be addressed in the application.
- A concern was raised by the conservation officer in relation to the treatment of the western boundary of the site and the length of the gardens at this area. This concern should be addressed by the applicant.
- There is a historic treeline at the southern boundary and it is essential that it be protected during construction works and ensure that the development would not negatively impact on the health of the trees.

**4. Transportation and Accessibility****ABP Comments:**

- Information included within the traffic assessment will need to be evidence based and robust.



- Clarify if there is potential to widen Sunberry Drive road/footpath.
- Concerns regarding potential for queuing on Sunberry Drive due to traffic movements on the R617.
- The pedestrian links and permeability should be clearly indicated on drawings submitted and should satisfy the concerns raised by the PA regarding poor connectivity from the site to Blarney town centre.
- Consideration of any upgrades that may be required on the surrounding road network to facilitate the development.

**Prospective Applicant's Comments:**

- TRICS was used to ascertain the potential impact on the road network. TRICS is a well-established and accepted database that is an evidence based and robust.
- No objection to carrying out a sensitivity test for the potential impact of the development based on similar developments in the area.
- There is no ability to widen the footpath/road at Sunberry Drive.
- It is highly unlikely that a development of this nature and scale would result in queuing on the local road network.
- Upgrade works were recently carried out on the R617 which included the road being levelled out and new signage provided.
- Unclear to the concern with issue raised in the PA report in relation to pedestrian crossing and connectivity.

**Planning Authority's Comments**

- Scope to prepare a sensitivity test against similar development in the area.
- Possible safety implications of car queuing up Sunberry Drive.
- Pedestrian improvements may be required in the town centre to accommodate additional pedestrian movements generated by the development.

**5. Water Services – Drainage**

**ABP Comments:**

- Consideration of the proposed drainage network within and adjacent to the site, having regard to the location of the apartments in relation to wayleaves / retaining walls, stormwater and SUDS.
- Clarification of any third party consents that may be required to facilitate the drainage works should be included in any application.
- Concerns of the PA's Drainage Department should be fully addressed. Further engagement between the applicant and the PA is recommended to discuss technical details.

**Prospective Applicant's Comments:**

- A site investigation has been initiated, awaiting analysis as the report was delayed due to COVID, the results will inform the underlying layout of ground seepage and ground water levels.
- A site-specific technical report can be prepared in relation to the wall mentioned by the PA.

- Further engagement will be sought with the PA to discuss calculations and other technical details.

**Planning Authority's Comments:**

- Further information is required in relation to SUD's strategy, seepage, runoff, cut and fill.
- Potential of slippage at the proposed retaining wall at the sites southern boundary should be addressed.
- Query if there is sufficient space between the western site boundary and the apartment blocks to allow for the required infrastructure.
- Further details required in relation to the attenuation calculations / surface water runoff.
- Fully address any potential for flood risk.
- It is best practice to engage with possible 3<sup>rd</sup> party landowners due to the amount of drain locations.

**6. Any Other Matters**

**ABP Comments:**

- A full day/sunlight assessment should be submitted at application stage that has regard to BRE/BS guidelines. If there are areas not in compliance fully demonstrate any shortcomings along with any rationale/justification and compensatory measures proposed if any.
- Identify all material contraventions of statutory plans.
- Ensure that all documentation is consistent.

**Prospective Applicant's Comments:**

- All required documentation will be submitted at application stage.
- There is a demand for housing in Blarney and the applicant is prepared to proceed with developing this site.

**Planning Authority's Comments:**

- Nothing further to add.

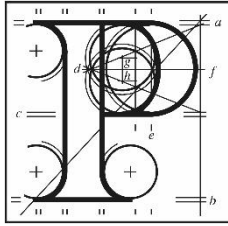
## Conclusion

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published
- Sample notices, application form and procedures are available on the ABP website. Note recent changes to public notice requirements.
- Irish Water would like prospective applicants to contact Irish Water at [cdsdesignqa@water.ie](mailto:cdsdesignqa@water.ie) **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is [spatialplanning@water.ie](mailto:spatialplanning@water.ie)

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Tom Rabbette  
Assistant Director of Planning  
July, 2021



An  
Bord  
Pleanála

## **S. 6(7) of Planning and Development (Housing) and Residential Tenancies Act 2016**

### **Inspector's Report on Recommended Opinion ABP-310013-21**

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#### **Strategic Housing Development**

Demolition of existing garage and southern boundary wall, construction of 143 no. residential units (105 no. houses, 38 no. apartments) creche and associated site works.

#### **Location**

Monacnapa, Blarney, Co. Cork.

#### **Planning Authority**

Cork City Council

#### **Prospective Applicant**

Eoin Sheehan

#### **Date of Consultation Meeting**

18<sup>th</sup> June 2021

#### **Date of Site Inspection**

5<sup>th</sup> June 2021

#### **Inspector**

Elaine Power

## 1.0 Introduction

- 1.1. Having regard to the consultation that has taken place in relation to the proposed development and also having regard to the submissions from the planning authority, the purpose of this report is to form a recommended opinion as to whether the documentation submitted with the consultation request under section 5(5) of the Planning and Development (Housing) and Residential Tenancies Act 2016 - (i) constitutes a reasonable basis for an application under section 4, or (ii) requires further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

## 2.0 Site Location and Description

- 2.1. The subject site is located in the north-western periphery of Blarney, c. 9kms northwest of Cork City Centre. Blarney is bisected by the R617 (Blarney Inner Relief Road / Sunberry Road), the commercial area of the town is generally located to the south of the R617 and the area to the north of the R617 is generally residential in nature. The subject site is located to the north of the R617. The site has an elevated location with extensive views overlooking Blarney town centre to the south, including Blarney Castle. Levels rise steeply from south to north across the site with various undulations throughout. Knockacorbally, a local peak, with a height of 106m is located beyond the northern site boundary.
- 2.2. The site has a stated area of 7.65 ha and is currently in agricultural use. It is bound to the north and west by agricultural lands and to the south by a steep wooded ridge. The northern, western and southern boundaries have significant numbers of mature trees. There is a national school to the south, fronting onto the R617 and backing onto this heavily wooded area. To the east the site is bound by the rear gardens of detached dwellings in Sunberry Heights. This boundary with the existing residential dwellings includes a combination of mature hedge, fence/wall or left open.
- 2.3. Access to the site is from Sunberry Drive, which is a steep and narrow residential estate road, via an existing laneway / agricultural track to the south (side) of no. 1 Sunberry Drive. Sunberry Drive currently serves a single detached dwelling and twenty detached houses at Sunberry Heights and Sunberry Drive estates.

### 3.0 Proposed Strategic Housing Development

- 3.1. The proposed development comprises the construction of 143 no. residential units, 105 no. houses and 38 no. apartments and a creche. The works also include the demolition of a garage and a boundary wall which would be replaced with a new southern boundary wall, as well as lowering of the existing eastern boundary wall and pier at no. 1 Sunberry Drive.
- 3.2. The proposed development is accessed from an existing agricultural access from the existing Sunberry Drive residential estate road via the R617. An upgrade to the Sunberry Drive is proposed, including widening of the footpath at the junction with the R617, raised platforms, security barriers and fencing, road markings and road resurfacing to facilitate improved pedestrian / cycle connectivity.
- 3.3. The following details as submitted by the applicant are noted:

<b>Parameter</b>	<b>Site Proposal</b>
<b>Application Site Area</b>	7.79 ha gross / 4.1 ha net
<b>No. of Units</b>	143 no. (105 no. houses and 38 no. apartments).
<b>Density</b>	35 units per ha
<b>Other Uses</b>	Creche – 42 no. childcare places (309sqm)
<b>Public Open Space</b>	7,934sqm (19% site area)
<b>Height</b>	2-storey houses 3 / 4 storey apartment
<b>Car Parking</b>	182 no. spaces
<b>Bicycle Parking</b>	238 no. spaces
<b>Vehicular Access</b>	vehicular access from Sunberry Drive

- 3.3.1. The breakdown of unit types as follows: -

Unit Type	1-bed	2-bed	3-bed	4-bed	Total
Houses	-	8	71	26	105
Apartments	8	30	-	-	38
Total	8	38	71	26	143
% Total	5.6%	26.6%	49.6%	18.2%	-

## 4.0 Policy Context

### 4.1. *Blarney Macroom Municipal District Local Area Plan 2017*

The site is located within the development boundary of Blarney and is zoned as Medium B Residential Development (12-25 units / ha). It has the site specific zoning objective BL-R-03:

*Medium B Density Residential Development including detached dwellings, limited to the lower portion of the site. The upper part of the site, closer to the ridge, is generally unsuitable for development and should be retained as open land uses with long term strategic planting as part of the overall scheme.*

Section 3.2.17 of the Plan states the following in relation to the subject site:

*In relation to the BL-R-02 and the BL-R-03 sites, there is no direct access to a public road. Future development proposals on these sites will need to ensure that safe access is provided. This issue will be of particular concern when servicing the BL-R-03 site. Serious consideration should be given, in any proposal on this site, to the following traffic related issues;*

- *The impact of increased traffic at the junction of Strawberry Heights and the R617,*
- *The gradient of Sunberry Heights as it approaches the Blarney Inner Relief Road,*
- *Pedestrian and cycling connectivity between the BL R-03 and the town centre.*

Objective GO-06 of the Plan relates to the visual impacts of developments in close proximity to Blarney Castle and states:

*Ensure adequate regard is given to assessing the visual impacts of new developments in close proximity to Blarney Castle and Estate so as to ensure that such developments do not compromise the landscape heritage character of the area.*

#### 4.2. **Cork County Development Plan 2014-2020**

While the site is now located within the boundary of Cork City Council (31st May 2019) the relevant statutory plans are the Cork County Development Plan 2014.

NOTE: The following includes the provisions of Variation No. 1, adopted 12th February 2018, which updates the development plan to reflect the revised housing supply figures, approach to Active Land Management and the Metropolitan Cork Strategic Land Reserve arising from the adoption of the Municipal District Local Area Plans in 2017.

Blarney is identified as a Metropolitan Town located within the Cork 'gateway' and at the second tier of the settlement strategy in the development plan Core Strategy. The strategic aim is to promote such towns as critical population growth, service and employment centres within the Cork 'gateway', providing high levels of community facilities and amenities with infrastructure capacity, high quality and integrated public transport connections. Table B1 of Variation No. 1 states that Blarney has a population target of 7,533 for 2022 from a base of 2,437 in the 2011 Census. A total of 2,566 new residential units are required for the period 2011-2022 with an estimated zoned land requirement of 103 ha.

Chapter 3: Housing includes the following policies and objectives, which are considered relevant: HOU 3-1: Sustainable Residential Communities; HOU 3-2 Urban Design; HOU 3-3 Housing Mix; HOU 4-1 Housing Density on Zoned Land, which states the following in relation to 'Medium B' residential density development (12-25 units / ha):

- Max net density extended to 35 dwellings / ha in smaller towns outside Metropolitan Cork.



- Normally applicable in smaller towns (less than 5,000 population)
- Can be applied in larger towns through LAP's where there is a requirement to broaden the range of house types.
- Densities less than 12 dwellings / ha will be considered where an exceptional market requirement has been identified.
- Densities between 25 and 35 dwellings / ha will be considered where an exceptional market requirement has been identified.
- Consider a lower standard of public open space provision where larger private gardens are provided.
- Must connect to public water and waste-water services.
- Broad housing mix normally required including detached, serviced sites unless otherwise specified in the relevant Local Area Plan.

Chapter 5: Social and Community. Section 5.3 relates to childcare facilities and includes objective SC 3-1: Childcare Facilities. Section 5.5 sets out public open space requirements for residential developments, also relevant objectives SC 5-2: Quality Provision of Public Open Space; SC 5-5: Recreation and Amenity Policy; SC 5-8 Private Open Space Provision. Section 5.7.7 requires a public open space provision of at least 12-18% of a site, excluding areas unsuitable for construction.

Chapter 10: Transport and Mobility. Section 10.2 sets out policies on walking, cycling and public transport including objectives TM 2-1: Walking, TM 2-2: Cycling and TM 2-4: Bus Transport (Metropolitan Area). Table 10.1 identifies Blarney as a location for key bus service improvements with an all day target frequency of 30 mins. Section 10.4 sets out parking policy including objective TM 4-1: Car and Cycle Parking.

Chapter 12: Heritage, including policies on archaeological heritage.

Chapter 13: Green Infrastructure and Environment. Section 13.5 on landscape including objectives GI 6-1: Landscape; GI 7-1 General Views and Prospects; GI 7-2 Scenic Routes; GI 7-3: Development on Scenic Routes. The site is adjacent to Scenic Routes S39 and S40.

#### 4.3. ***Regional Spatial and Economic Strategy for the Southern Region***

A key component of the RSES is to strengthen the settlement structure of the southern region and to capitalise on the individual and collective strengths of our three cities (Cork, Waterford and Limerick-Shannon), our metropolitan areas, and our strong network of towns, villages and rural communities.

The RSES incorporates the Cork Metropolitan Area Strategic Plan which states that the sustainable growth of Metropolitan Cork requires consolidation, regeneration, infrastructure led growth and investment in a number of locations within the county including Blarney which is identified as a metropolitan town on rail corridor.

#### 4.4. ***National Planning Framework (2018)***

The National Planning Framework addresses the issue of 'making stronger urban places' and sets out a range of objectives which it considers would support the creation of high quality urban places and increased residential densities in appropriate locations while improving quality of life and place. Relevant Policy Objectives include:

- National Policy Objective 4: 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.
- 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.
- National Policy Objective 33: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- National Policy Objective 35: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

#### 4.5. **Section 28 Ministerial Guidelines**

Having considered the nature of the proposal, the receiving environment, the documentation on file, including submission from the planning authority, I am of the opinion, that the directly relevant section 28 Ministerial Guidelines are:

- ‘Urban Development and Building Height, Guidelines for Planning Authorities’. 2018
- ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ 2020
- ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (including the associated ‘Urban Design Manual’)
- ‘Design Manual for Urban Roads and Streets’ (DMURS) • ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’)
- ‘Childcare Facilities – Guidelines for Planning Authorities’

Other relevant national guidelines include:

- Framework and Principles for the Protection of the Archaeological Heritage Department of Arts, Heritage, Gaeltacht and the Islands 1999.

#### 5.0 **Section 247 Consultation(s) with Planning Authority**

5.1. It is stated by the prospective applicant that a formal pre-planning consultation meeting took place with the Planning Authority in relation to the proposed development on the 17<sup>th</sup> February 2021. A summary of the consultants is outlined below: -

- The Boards previous decision to refuse permission on the site is noted.
- The proposed development contravenes the land use zoning objective, which is considered a reasonable objective.
- The proposed density is too high. Consideration of a higher density is premature pending the outcome of the CMAT’s proposals to establish if high frequency public transport would serve Blarney. This is relevant as the applicant is relying on public transport to reduce the car parking provision.

- The de-zoning of the site is not envisioned, however, its short term developability is unclear.
- The site is highly constrained due to its topography and access.
- Permeability and connectivity to the town centre is poor.
- The historic tree lines should be respected, and the development set back at the southern and western site boundaries.
- Layout is monolithic it is not sympathetic to the topography of the site. How the corners of each character area relate to each other is unclear. The positioning of gables overlooking the roads and open space is unacceptable, a more sensitive treatment of corners is required.
- The position and internal layout of the apartments is questionable.
- Blarney cannot be considered Cork City. It is a distinct settlement.
- Additional drainage details are required, including third party consent, cut and fill details, run off rates, impact on retaining structures, SuDS.
- Traffic and Transport Assessment need to be clearer and more robust.
- Clarification is sought regarding waste management for individual units.
- In conclusion the site is highly constrained. There are a number of issues around the drainage access, junction design and permeability and the proposed development is a material contravention of the sites zoning objective.

Full details of the meetings are included in the planning authority's submission.

## 6.0 Planning History

### Subject Site

**ABP 308156-20 Strategic Housing Development – Application:** Permission was refused in 2020 for the construction of 150 no. residential units (112 no. houses and 38 no. apartments) and a creche on the subject site. The reason for refusal states: -

1. *The proposal for the construction of 150 number residential units, on lands zoned Medium B Density Residential Development in the Blarney Macroom Municipal District Local Area Plan 2017, materially contravenes zoning objective BL-R-03, that states Medium B Density Residential Development including detached dwellings, limited to the lower portion of the site. The proposed development includes a residential density in excess of that planned for on the lower portion of the site which has been reserved for a residential density range of between 12-25 units per hectare in the adopted land use zoning objective. It is considered that the inclusion of a residential density of 36.6 units per hectare, within an area of land for which the residential density range is 12-25 units per hectare, would be contrary to the Local Area Plan and not be in accordance with section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, which is required to be included in the public notice at application stage, therefore, the Board is precluded from granting permission for the proposed development .*

**PL04.234024, Reg. Ref. 08/9047:** Permission refused in 2009 for the construction of 133 no. dwellings and a creche on the subject site for the 2 no. reasons below:

1. *The site is zoned for medium density residential development limited to the lower portion of the site with the upper part of the site to be retained as open space in the Blarney/Kilbarry Local Area Plan 2005 and is part of the designated scenic landscape in the Cork County Development Plan 2009. The proposed development includes a significant number of houses on the upper part of the site which has been reserved for open space in the adopted land use zoning objective. The proposed development would, therefore, materially contravene the zoning objective for the site, would be visually obtrusive, in particular from views from Blarney Castle, a significant tourist attraction, and would be contrary to the proper planning and sustainable development of the area.*

2. *The Board is not satisfied that surface water arising within the proposed development would be adequately dealt with on site or safely discharged to the adjoining surface drainage system, and not add to or exacerbate flooding in the vicinity and downstream of the site.*

## **Surrounding Sites**

**PL04.248614, Reg. Ref. 16/7122:** Permission was granted in 2017 for the demolition of an existing dwelling house and the construction of 88 no. residential units, a crèche and all ancillary site development works on a site c. 215m north east of the subject site.

## **7.0 Submissions Received**

**Irish Water:** In respect of wastewater upgrades to the network are required. In this regard upsizing of c. 320m of 150mm diameter sewer and upsizing of c. 310m of 225mm diameter sewer. Currently there are no plans to upgrade these sewers. The upgrade would be at the developer's expense.

In respect of water, records indicate that there are existing assets within the site. The exact route of this pipe would need to be investigated. The applicant must engage with IW in regard to an assessment of feasibility of any diversions which may be required. The findings of the assessment must be agreed with IW to ensure adequate protection of existing assets and to ensure appropriate separation distances can be achieved.

## **8.0 Forming the Opinion**

- 8.1. Pursuant to section 6(7) of the Act of 2016, regard is had in the forming of the opinion to the documentation submitted by the prospective applicant; the Planning Authority submission and the discussions which took place during the tripartite consultation meeting. I shall provide a brief detail on each of these elements hereunder.

### **8.2. *Documentation Submitted by Applicant***

The prospective applicant has submitted information pursuant to section 5(5)(a) of the Planning & Development (Housing) and Residential Tenancies Act 2016 and Article

285 of the Planning and Development (Strategic Housing Development) Regulations 2017.

The information submitted included the following: SHD application form, Planning Report and Statement of Consistency, Statement of Material Contravention, Design Statement, Housing Quality Assessment, Advisory Report: Blarney Housing Requirement, Childcare needs Assessment, School Demand Report, Ecological Impact Assessment, Environmental Impact Assessment Screening, Screening for Appropriate Assessment, Archaeological Assessment, Landscape and Visual Impact Assessment, Landscape Design Rationale, Building Lifecycle Report, Engineering Services Report, Transportation Assessment Report, Construction Environmental Management Plan, Part V Costs and Methodology, Lighting and Power Specifications, CGI's and Photomontages.

Section 5(5)(b) of the Act of 2016 requires the submission of a statement that, in the prospective applicant's opinion, the proposal is consistent with both the relevant objectives of the development plan or local area plan concerned, and the relevant guidelines issued by the Minister under section 28 of the Act of 2000. This statement has been submitted, as required.

I have reviewed and considered all of the documents and drawings submitted.

## 9.0 **Planning Authority's Submission**

9.1. In compliance with section 6(4)(b) of the Act of 2016 the planning authority for the area in which the proposed development is located, Cork City Council, submitted a note of their section 247 consultations with the prospective applicant and also submitted their opinion in relation to the proposal. These were received by An Bord Pleanála on 19<sup>th</sup> May 2021.

9.2. Cork City Council's written opinion includes relevant policy context, details of pre-planning, departmental reports and an assessment of the proposed development. The content of the report is summarised as follows:

***Principle of Development:*** The principle of residential and creche use at this site is generally acceptable.

The site is zoned medium density (12 – 25 units per ha). The density as proposed (35 units per ha) is higher than that prescribed in the sites BR-R-03 zoning objective. Compliance with local and national policy guidance in relation to density is a key consideration in relation to this site. The higher densities prescribed in the NPF are not necessarily relevant in areas such as Blarney. Blarney is a small town which does not share the same characteristics as Cork City, in terms of density, services etc. Attention is drawing to circular NRUP 02/2021 Residential Densities in Towns and Villages.

The population of Blarney is currently less than 3,000 persons and is, therefore, categorised as a small town. It is envisioned that Blarneys population and housing stock would grow but at a much slower rate than Cork City and suburbs. This is due to a number of factors, including water services and road constraints.

Public transport improvements for the Blarney area are not at a detailed level of planning which may lead to increased car dependency for this development.

***Housing Mix:*** More detached dwellings would be desirable.

***Conservation / Visual Impact:*** The site is directly north of Blarney Castle and is generally screened by mature trees. The development would be visible from the upper levels of the Castle. The setting back of dwellings from the western boundary should be considered as this would allow for mature hedgerow to be maintained.

The scheme is located on the western boundary of Blarney's development area, therefore, increasing the visual impact that the development may have. It is recommended that cross sections through the site and Blarney Castle are provided to allow for the full assessment of any potential impact.

It would be preferable to have a greater separation distance between the southern boundary and the apartments to ensure the continued health of the trees, retain views from the Castle and for the amenity of the future residents.

***Urban Design, Layout and Residential Amenity:*** The development should be of a high quality standard, including open space and quantitative standards for apartments and houses and sustainable connectivity to the town centre.



The site is located on a prominent elevated site. A scheme with a lower density and considered design would be more appropriate. Revisions to the large block formations and gables fronting onto services roads and open spaces should be considered.

Revisions to the layout of the public open space to allow for a more practical and usable space should be considered.

It is important to ensure adequate priority is given to pedestrian / cyclists within the development and that the development links in with its surroundings as opposed to constituting a standalone car dependant development.

With regard to private open space concerns are raised regarding irregular shaped gardens and the implications for residential amenity of the occupants.

Concerns regarding overlooking of rear gardens from within the scheme.

Consideration of reconfiguration of apartments to provides living spaces on the southern elevation.

Concerns regarding overshadowing of apartment units from existing trees. A greater separation distance would be preferable.

The impact of the proposed development on existing dwellings in Sunberry Estate includes visual impact, overlooking and overshadowing. Having regard to the site topography, the proximity of the proposed dwellings to the north and west of Sunberry requires further consideration.

***Access Arrangements and Connectivity:*** The report of Road Design Section is noted. It raises issues of sightlines and speed surveys in relation to the junction of the R617 and Sunberry Drive.

There are significant gaps in the receiving pedestrian network which need to be addressed having regard to the scale of the proposed development, the intensification of use of the existing network and the applicants forecasted modal split.

Clarification of information outlined in the Traffic and Transportation Assessment is required.

**Surface Water Disposal and Site Services:** The reports of the Drainage Section, the Environment Section and the Area Engineer are noted.

Drainage concerns regarding the location of the apartments in respect of wayleaves / retaining walls, stormwater assessment discrepancies and the application of SuDS. It is advised that further consultation is required.

Concerns are also raised in respect of surface water proposals. The applicant is required to survey the public storm system.

The Environment Section seeks an operational waste management plan.

**Car / Bicycle Parking Requirements:** The quantum of cycle parking is satisfactory. The quantum of car parking is below development plan standards. However, it is satisfactory subject to the implication of a mobility management plan.

**Part V:** It is recommended that the applicant consult with the Housing Section prior to lodging an application.

**Childcare Facilities:** Compliance with national standards is a key consideration.

**Archaeology:** The requirements are the same as recommended for the previous application.

**Landscaping and Boundary Treatment:** The report from the Parks Department is noted. It is recommended that tree planting in the form of groups (of appropriate species) be extended to the northern part of the site.

**Environmental Screening:** The submission of an EIA Screening Report and AA Screening Report are noted.

## 10.0 **The Consultation Meeting**

- 10.1. A Section 5 Consultation meeting took place via a Conference Call on the 18<sup>th</sup> June 2021, commencing at 10.00. Representatives of the prospective applicant, the Planning Authority and An Bord Pleanála were in attendance. An agenda was issued by An Bord Pleanála prior to the meeting.

10.2. The main topics raised for discussion at the tripartite meeting were based on the Agenda that issued in advance and contained the following issues:

**Item 1:** In relation to the **Development Strategy**, ABP representatives sought further elaboration / discussion / consideration on the following:

- Rationale and clear justification for the density of the scheme having regard to Objective BL-R-03, the previous refusal on the site and national guidance.
- Rationale for the proposed internal layout of the apartment units.
- Consideration of the location and orientation of the apartment units.
- Justification for the proposed housing mix.
- Consideration of proposed materials
- Consideration of phasing

**Item 2:** In relation to the **Open Space**, ABP representatives sought further elaboration / discussion / consideration on the following:

- Justification and clear rationale for design and layout of private open space, having regard to the concerns raised by the Planning Authority.
- Consideration of the future use and maintenance of the open space within the northern portion of the site.
- Consideration of the potential impact on hedgerows and trees provided within rear gardens of houses.

**Item 3:** In relation to the **Visual Impact from Blarney Castle** ABP representatives sought further elaboration / discussion / consideration in relation to:

- Consideration of the impact of the proposed development on views from Blarney Castle.
- Consideration of the impact of the development on existing trees and hedgerows within the site, that currently screen the site when viewed from Blarney Castle.

**Item 4:** In relation to the **Transportation and Accessibility** ABP representatives sought further elaboration / discussion / consideration in relation to:

- Consideration of the impact of traffic generated by the development on the surrounding road network and ensure the information provided in the traffic assessment is robust and evidence based.
- Consideration of any upgrades that may be required on the surrounding road network to accommodate the development and associated increased pedestrian and vehicular movements.

**Item 5:** In relation to the **Water Services** ABP representatives sought further elaboration / discussion / consideration in relation to:

- Consideration of the proposed drainage network within the site, regarding the location of the apartments in respect of wayleaves / retaining walls, stormwater assessment discrepancies and the application of SuDS.
- Consideration of surface water run off rates and ensure the information provided is robust and evidence based.

**Item 6:**

In relation to Any Other Matters, ABP representatives sought further consideration of the following: -

- The requirements of BRE209 / BS2011 with regard to Daylight / Sunlight / Overshadowing.
- Any potential material contraventions of statutory plans should be identified and fully addressed.
- All documentation submitted with the application should be consistent.

The prospective applicant and the planning authority were given the opportunity to comment and respond to the issues raised by the representatives of ABP. Those comments and responses are recorded in the 'Record of Meeting 310013' which is on file. I have fully considered the responses and comments of the prospective applicant and planning authority in preparing the Recommended Opinion hereunder.

## 11.0 Conclusion and Recommendation

- 11.1. Based on the entirety of the information before me, it would appear that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 11.2. I have examined all of the information and submissions before me including the documentation submitted by the prospective applicant, the submissions of the Planning Authority and the discussions which took place at the tripartite meeting. I have had regard to both national policy, via the Section 28 Ministerial Guidelines, and local policy, via the statutory plan for the area.
- 11.3. Having regard to the above, I recommend that the Board serve a notice on the prospective applicant, pursuant to Section 6(7)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, stating that it is of the opinion that the documentation submitted with the consultation request under section 5(5) of the Act: **constitutes a reasonable basis for an application** under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016.
- 11.4. I would also recommend that the prospective applicant be notified, pursuant to article 285(5)(b) of the 2017 Regulations, that specified information (as outlined hereunder) be submitted with any application for permission that may follow. I believe the specified information will assist the Board at application stage in its decision-making process. I am also recommending that a number of prescribed bodies (as listed hereunder) be notified by the prospective applicant of the making of the application.

## 12.0 Recommended Opinion

- 12.1. The Board refers to your request pursuant to section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016. Section 6(7)(a) of the Act provides that the Board shall form an opinion as to whether the documents submitted with the consultation request (i) constitute a reasonable basis for an application under section 4 of the Act, or (ii) require further consideration and amendment in order to constitute a reasonable basis for an application under section 4.

12.2. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, **An Bord Pleanála is of the opinion that the documentation submitted would constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.**

12.3. Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission arising from this notification:

1. Notwithstanding that the proposal constitutes a reasonable basis for an application demonstrate / justify the suitability of the proposed site to accommodate the residential density with regard to the sites BL-R-03 Objective as set out in the Blarney Macroom Municipal District Local Area Plan 2017, the provisions of the development plan and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); Circular NRUP 03/2021 Residential Densities in Towns and Villages; The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).
2. A report that addresses and provides a clear design rationale for the proposed design and layout, character areas, materials and finishes of the proposed development including specific detailing of finishes and frontages for the proposed apartment blocks, and the maintenance of same. Having regard the visual sensitivity of this site particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.
3. A layout plan and report that address and provides details of pedestrian connectivity to Blarney Town Centre.

4. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces.
5. Childcare Demand Report, which identifies demand for childcare places likely to be generated by the proposal and the capacity of the childcare facility previously granted on the subject site and existing facilities in the vicinity to cater for such demand.
6. School Demand Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.
7. Address issues raised in the planning authority's Area Engineers Report and the Road Design Report.
8. Address issues raised in the report of Irish Water to An Bord Pleanála dated 19<sup>th</sup> May 2021 and in the planning authority's Drainage Report.
9. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of public open spaces and Part V provision.
10. A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.
11. A material contravention statement, in respect to any and all elements of the development that may materially contravene the Local Area Plan and Development Plan objectives or policies applicable to the site.

12. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

Pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. Transport Infrastructure Ireland
3. National Transport Authority
4. Department of Culture, Heritage and the Gaeltacht
5. An Taisce
6. The Heritage Council
7. Fáilte Ireland
8. An Chomhairle Ealaíon
9. Cork City Council Childcare Committee.

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the

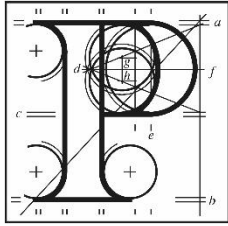


Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Elaine Power  
Planning Inspector

5<sup>th</sup> July 2021



An  
Bord  
Pleanála

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## Planning and Development (Housing) and Residential Tenancies Act 2016

### Notice of Pre-Application Consultation Opinion

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**Case Reference: ABP-310013-21**

**Proposed Development: Demolition of existing garage and southern boundary wall, construction of 143 no. residential units (105 no. houses, 38 no. apartments) creche and associated site works.**

**Monacnapa, Blarney, Co. Cork.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.

Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Notwithstanding that the proposal constitutes a reasonable basis for an application demonstrate / justify the suitability of the proposed site to accommodate the residential density with regard to the sites BL-R-03 Objective

as set out in the Blarney Macroom Municipal District Local Area Plan 2017, the provisions of the development plan and relevant national and regional planning policy including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); Circular NRUP 03/2021 Residential Densities in Towns and Villages; The 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2020) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).

2. A report that addresses and provides a clear design rationale for the proposed design and layout, character areas, materials and finishes of the proposed development including specific detailing of finishes and frontages for the proposed apartment blocks, and the maintenance of same. Having regard the visual sensitivity of this site particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.
3. A layout plan and report that address and provides details of pedestrian connectivity to Blarney Town Centre.
4. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority, and the phased delivery of such public open spaces.
5. Childcare Demand Report, which identifies demand for childcare places likely to be generated by the proposal and the capacity of the childcare facility previously granted on the subject site and existing facilities in the vicinity to cater for such demand.
6. School Demand Report, which identifies demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.
7. Address issues raised in the planning authority's Area Engineers Report and the Road Design Report.

8. Address issues raised in the report of Irish Water to An Bord Pleanála dated 19<sup>th</sup> May 2021 and in the planning authority's Drainage Report.
9. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of public open spaces and Part V provision.
10. A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.
11. A material contravention statement, in respect to any and all elements of the development that may materially contravene the Local Area Plan and Development Plan objectives or policies applicable to the site.
12. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 unless it is proposed to submit an EIAR at application stage.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

- 1. Irish Water**
- 2. Transport Infrastructure Ireland**
- 3. National Transport Authority**

- 4. Department of Culture, Heritage and the Gaeltacht**
- 5. An Taisce**
- 6. The Heritage Council**
- 7. Fáilte Ireland**
- 8. An Chomhairle Ealaíon**
- 9. Cork City Council Childcare Committee.**

**PLEASE NOTE:**

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

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Tom Rabbette  
Assistant Director of Planning  
July, 2021