



COAKLEY O'NEILL
town planning

Statement of Response to the Opinion of An Bord Pleanála

**PROPOSED STRATEGIC HOUSING
DEVELOPMENT, MONACNAPA,
BLARNEY, CORK**

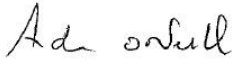


Prepared in February, 2022 on behalf of

Eoin Sheehan

Coakley O'Neill Town Planning Ltd.

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1.0 INTRODUCTION

- 1.1 Pre-application consultation under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended (Case Reference ABP-310013-21) took place on 18th June, 2021 between the applicant, Eoin Sheehan, and An Bord Pleanála ('the Board') and Cork City Council via Teams in relation to a proposed Strategic Housing Development at Monacnapa, Blarney, Cork.
- 1.2 The Board's Notice of Pre-Application Consultation Opinion (hereafter referred to as 'the opinion') was issued on 9th July, 2021, and is attached at Appendix 1 to this Response.
- 1.3 The opinion from the Board stated that *'the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development'*.
- 1.4 The opinion further states that, pursuant to article 285(5(b) of the Planning and Development (Strategic Housing Development) Regulations, 2017 that the following specific information should be submitted with any application for permission'. The opinion identifies twelve items of additional information, as follows:
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 19th 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.*
- 1.5 This report sets out the how the twelve items of additional information are addressed in the application.

2.0 SPECIFIC INFORMATION TO BE SUBMITTED WITH APPLICATION

- 2.1 This section sets out how twelve nine items of additional information requested by the Board are addressed in the application, as follows:

Demonstrate/Justify the proposed Residential Density with regard to the BL-R-03 zoning objective

- 2.2.1 As illustrated in Plate 1 below, the subject site is zoned BL-R-03 in the Blarney-Macroom Municipal District Local Area Plan (LAP) 2017, for which the specific objective is 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 lands with long term strategic planting as part of the overall scheme.



Plate 1: Extract from Blarney Land Use Zoning Map (site generally identified in red)

2.2.3 According to HOU 4-1 of the Cork County Development Plan 2014, a Medium B density equates to between 12-25 units/ha. Having regard to the requirement of the zoning objective to retain the upper part of the site, closer to the ridge, as open lands with long-term strategic planting, which is achieved in this instance, the resultant net developable area of the proposed development site is 4.1ha. As 143no. units are proposed, the proposed density equates to 35 units/hectare.

2.2.4 Having regard to Item 1 of the Board's Opinion of 9th July, 2021, the proposed density of 35 units/ha is fully justified in light of the following guidance:

- The general advice of section 6.3 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), specifically:
 - *New development should contribute to compact towns and villages:* In this instance the development of a suitably located backland, zoned, greenfield site, with pedestrian and cycle connectivity maximised as far as possible having regard to the site's characteristics and context, will contribute to the delivery of a compact town;
 - *Higher densities are appropriate in certain locations:* In this instance the proposed development is located on a residentially zoned site in the Metropolitan Town of Blarney within the extended City boundary that is located:
 - only 430m from the half-hourly 215 bus route to the City Centre (see Plate 3 below), which frequency is equivalent to the half hourly Cork commuter rail service, and which has available capacity;
 - on the proposed Cork Bus Corridor and BusConnects routes (see Plates 4 and 5 below);

- the proposed Cork Cycle Network (see Plate 6 below), and
- within reach of the proposed Blarney rail station on the existing suburban and intercity rail line (see Plate 7 below).
- *Offering alternatives to urban generated housing:* In this instance, the proposed development offers a good mix of quality housing in a high quality layout with plentiful open space, connectivity, and privacy, at the edge of, and within the development boundary of, Blarney Town, close to existing amenities, as a very competitive and sustainable alternative to urban generated rural housing in the Metropolitan Cork greenbelt, which is under significant pressure for rural housing;
- *The scale of new residential schemes for development should be in proportion to the pattern and grain of existing development.* In this instance, the layout of the proposed development references the pattern of existing residential development to the immediate east at Sunberry Drive and Castleown, and development under construction at Cluain Ard to the north-east (on the site zoned BL-R-02 in Plate 1), without impact on the architectural, heritage and environmental qualities of the Town. The recent mixed use and Primary Care Centre developments permitted by An Bord Pleanála under ABP-309152-21 and ABP-308670-20 respectively, to include a hotel and residential development of up to 4 storeys on the site of the former Blarney Park Hotel in the immediate vicinity of Blarney Castle were so granted on the basis that they 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 were not in material contravention of the local plan are would not compromise the landscape and heritage character of the area.
- The advice of section 6.4(i) of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), which 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.
- The advice of section 6.11 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), which advocate densities to a range of 20-35 units/hectare on edge of centre sites, to include a wide variety of house types. The proposed density is within this range.
- In relation to Circular NRUP 02/2021 (Residential Densities in Towns and Villages) dated 21 April, 2021, Blarney, which has a current population (2016) of 2,550 persons and a projected population of 5,881 (2028: Table 2.2 of the Core Strategy of the draft Cork City Development Plan 2022-2028), can be currently defined as a Small Town with a population of up to 5,000 persons. As is referenced above, on edge of centre sites such as the proposed development site, a density of 20-35 units per hectare is supported in the Circular. The proposed density accords with this advice. Equally, the Circular cautions against large scale, rapid development that may overwhelm or detract from the quintessential character of towns. In this respect, the proposed development of 143no. units is, as endorsed by the Inspector on previous application register reference ABP-308156-20, of modest scale (section 10.6.11 of the Inspector's Report), on lands that have been zoned for residential development for some time, which provides a mix of dwelling types, and is

predicated on the character and layout of the adjacent Sunberry Drive and Castleown housing estates in the vicinity and references the recently permitted and under construction residential development at Cluain Ard to the north-east. The Circular also notes that, in respect of Development at the Edge of Larger Towns, which Blarney would be classified as if it reaches its projected population by 2028, densities should be in the range of 35-50 dwellings per hectare, with net densities of less than 30 dwellings per hectare generally discouraged, particularly on sites of over 0.5ha. The net developable area of the proposed development site is 4.1ha.

- The advice of section 2.4 of the Apartment Guidelines 2018, which would indicate that the proposed development site, being located in Blarney Metropolitan Town on the edge of Cork City, but within walking distance of a frequent bus service, which has available capacity, 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.
- The Urban Development and Building Height Guidelines 2018, which promote, via Specific Planning Policy Requirement (SPPR) 4, the minimum densities of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) on suburban greenfield/edge of town sites.



Plate 2: Proposed development site (in purple) relative to local amenities

- The status of Blarney as a Metropolitan Town (and its inclusion in the expanded City boundary) in the Core Strategy of the Cork County Development Plan 2014, for which the strategic aim, as elicited by Objective CS 3-1 of the Plan, is a *critical population growth, service and employment centre 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.

- Figure 2.3 of the Plan identifies a population target of 7,533 people to 2022 (a growth of 5,096 people from 2011) in an additional 2,566 housing units. The proposed development of 143no. residential units, which could be occupied by up to 400 people (based on the average family size of 2.8 for Cork County (2016 census)), will make a contribution to this population and housing target.
- The proposed development site is located within walking distance of the resources and amenities of Blarney Town including, but not limited to:
 - Local recreational amenities including the Ardmadame Wood Walk, Blarney Bog & wetland walk (also known as Clogheenmilcon Sanctuary Loop), Blarney Running Trail, Blarney Village Green, Blarney GAA, and Blarney Pitch & Putt, as generally illustrated in Plate 3;
 - Local schools, including 3no. primary schools (Scoil Chroi Iosa; Gaelscoil Mhuscraí; and Cloghroe Mixed National School); and 1no. secondary school (Colaiste Muire secondary school, for which planning permission is in place to increase the capacity of the school from 525 to 1,200 pupils);
 - Local tourism resources including Blarney Castle and gardens and associated uses and Blarney Woollen Mills complex; and
 - Local shops, including 2no. Centras; cafes and restaurants; local doctors; local services; and local churches.

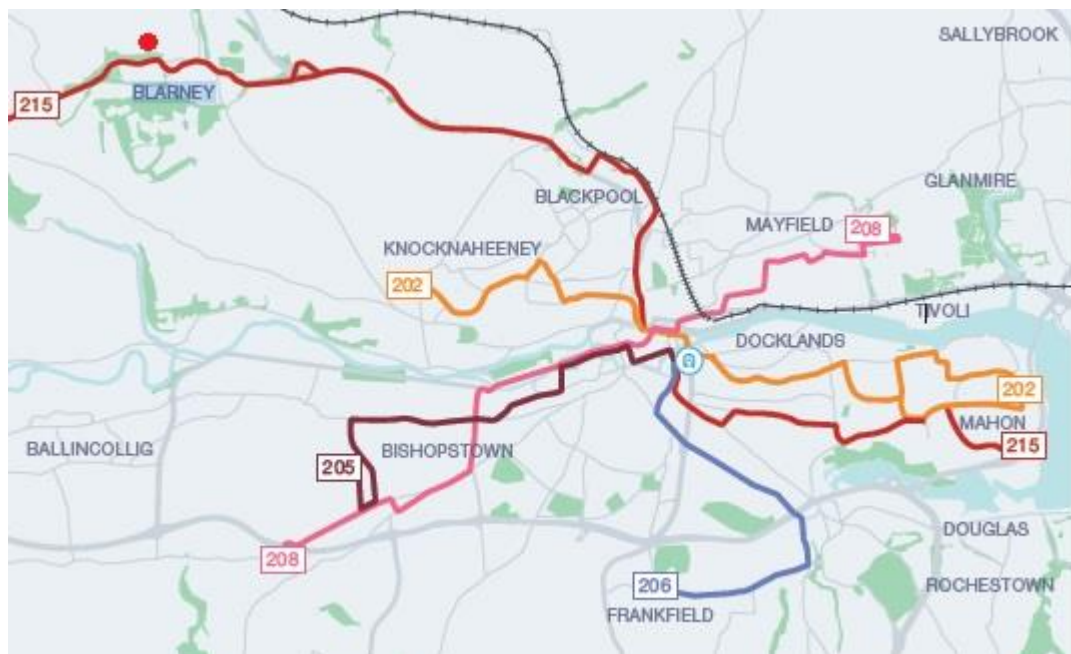


Plate 3: Proposed development site relative to the existing 215 bus route (CMATS 2020)

- The location of the proposed development site relative to the proposed Core Bus Corridor proposed in CMATS, as illustrated in Figure 4.

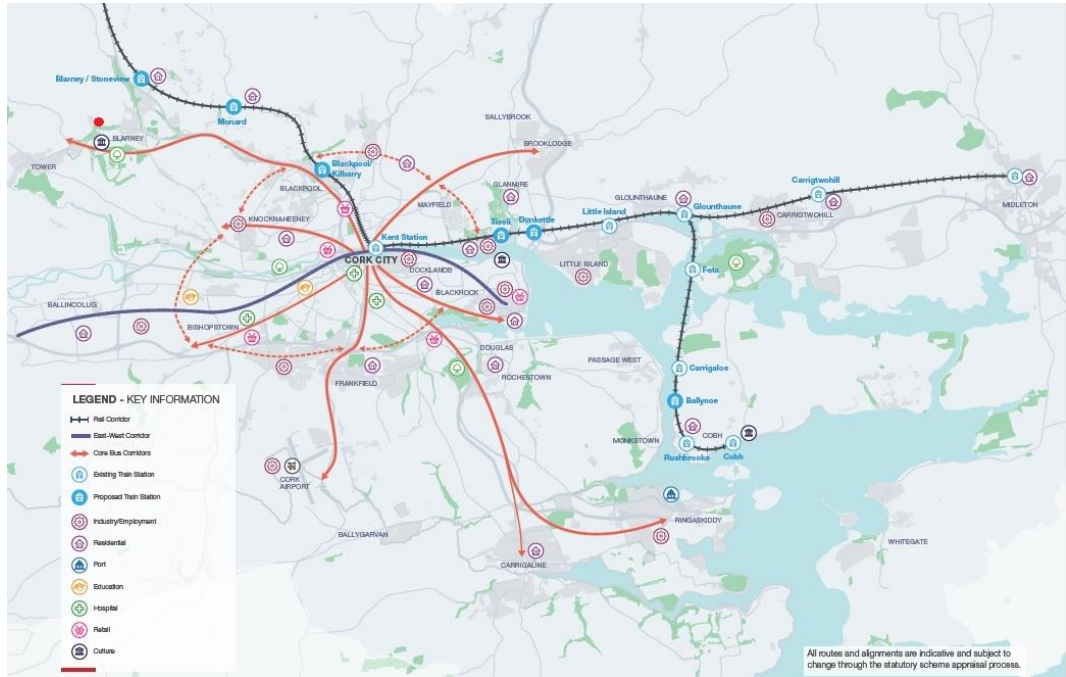


Plate 4: Proposed development site relative to the proposed Cork Bus Corridor for Blarney (CMATS 2020)

- The location of the proposed development site relative to the BusConnects route map, as illustrated in Plate 5.

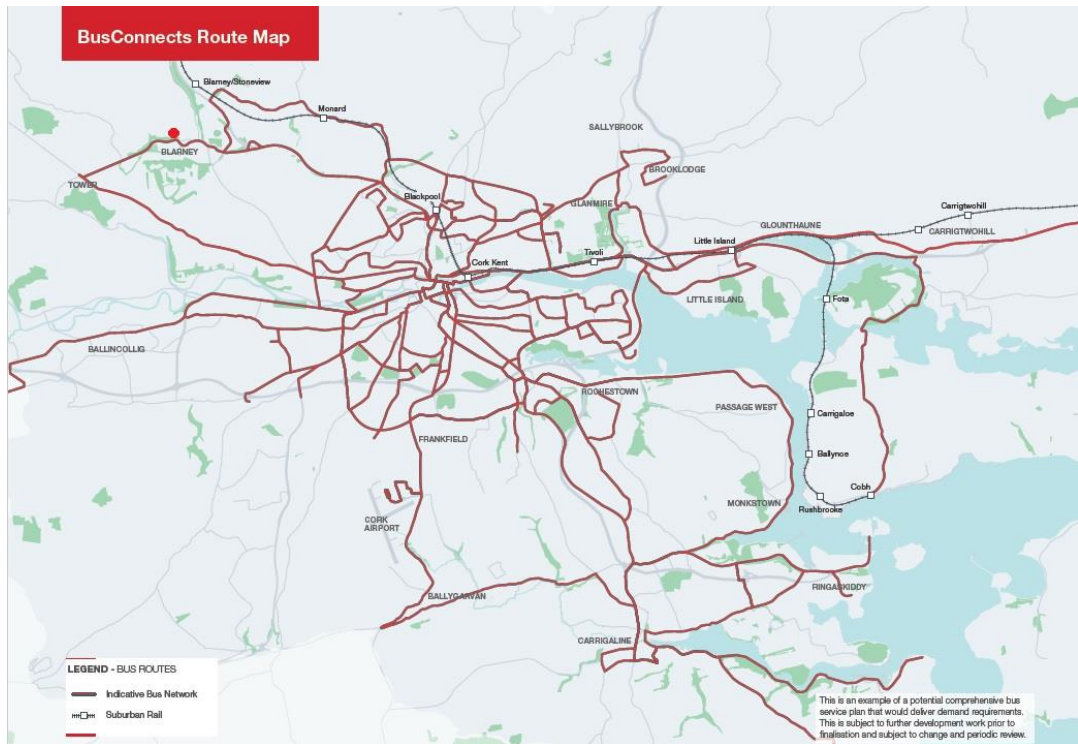


Plate 5: Proposed development site relative to the proposed BusConnects Route Map (CMATS 2020)

- The location of the proposed development site relative to the proposed Primary Cycle Route in the Cork Cycle Network Plan 2017, as carried through into CMATS, as illustrated in Plate 6.

- The location of the proposed development site relative to the proposed suburban rail line at Blarney, as illustrated in Plate 7.

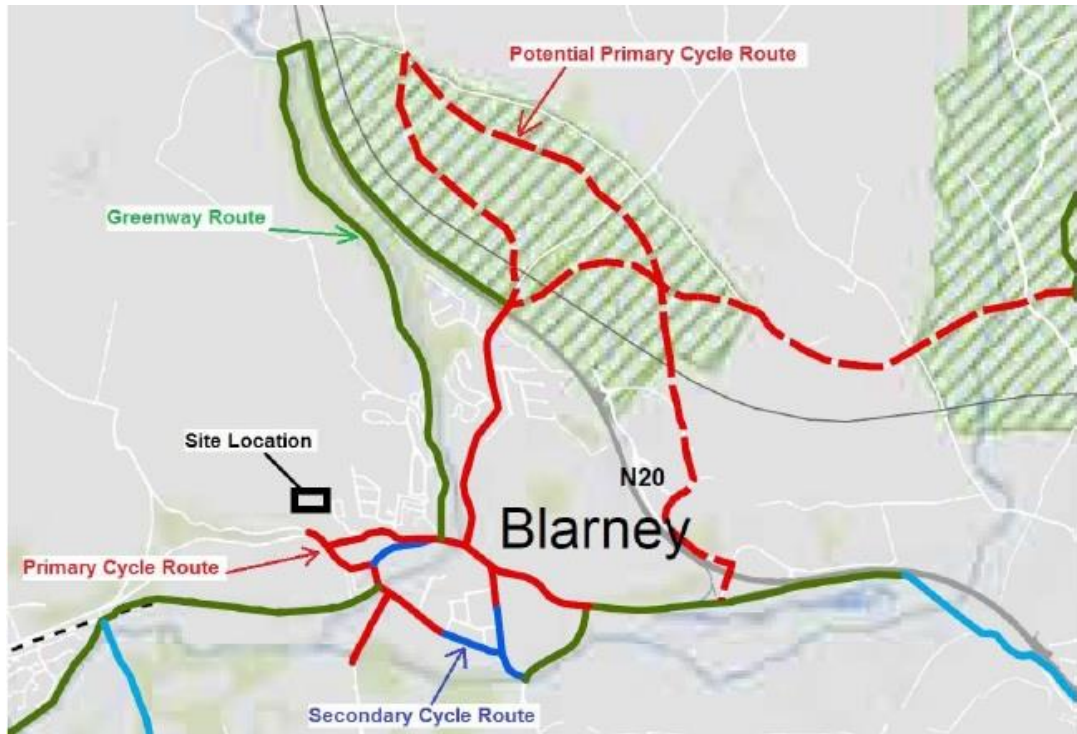


Plate 6: Proposed development site relative to the proposed Cycle Network for Blarney



Plate 7: Proposed development site relative to the proposed Suburban Rail Line for Blarney


The proposed development is also consistent with the advice of the Urban Design Manual that accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), as set out in Table 1 below:

Table 1: Urban Design Manual assessment

Criteria	Issue	Response
Context	How does the development respond to its surroundings?	<ul style="list-style-type: none"> The proposed development site is located on the north-western side of Blarney town in an established primarily residential area of generally medium density. The proposed development will effectively complete the existing Sunberry Heights and Sunberry Drive developments with which it shares an existing vehicular and pedestrian access. 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.
Connections	How well connected is the new neighbourhood?	<ul style="list-style-type: none"> 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 c. 10minutes walk maximum from the proposed development site, and this service has available capacity. The proposed development also provides improved local road infrastructure for the benefit of existing and future residents, including pedestrians and cyclists.
Inclusivity	How easily can people use and access the development?	<ul style="list-style-type: none"> The proposed development is accessed via the R617 and Sunberry Heights/Drive. There is an existing gated access into the proposed development site. All roads and footpaths are proposed at no more than 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. 5no. large, 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. All public open spaces are over-looked by the adjoining property to allow for passive surveillance to occur. In general, units front onto

		<p>open spaces, with feature gables providing overlooking in specific cases.</p>
Variety	<p>How does the development promote a good mix of activities?</p>	<ul style="list-style-type: none"> 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"> shared vehicular and pedestrian surfaces that create different home-zones; landscaped public open spaces crossed by pedestrian and cycle footpaths; paved urban open spaces (plazas) with viewing areas and green pockets. 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. 29no. Part V units are also dispersed throughout the site. The site itself is divided into four main character areas. Within these areas, units are characterised by a change in scale, house type and elevational treatment. <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>
Efficiency	<p>How does the development make appropriate use of resources, including land?</p>	<ul style="list-style-type: none"> The proposed layout considers the existing surrounding developments, the topographical nature of the site and the amenities required for the proposed dwellings. 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. The overall density of 35 units/ha ensures that the efficient and appropriate use of the proposed development site is achieved. Buildings are arranged to ensure optimum solar gain. <p>Careful consideration has been given to the location of dwellings relative to each other to ensure amenity is maintained.</p>

Distinctiveness	How does the proposal create a sense of place?	<ul style="list-style-type: none"> • 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. • Each of the four Character Areas to create distinctive yet connected neighbourhoods within the overall development. • Landscaping and planting are integrated throughout, to maximise the appeal of the proposed development. • 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.
Layout	How does the proposal create people friendly streets and places?	<ul style="list-style-type: none"> • 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. • Shared spaces on lower trafficked streets are provided internally within the site. • Footpaths are no less than 1.8m. • The proposed development will be signposted as a 3-kph 'slow zone' or 'home zone'. • Where carriageway kerbs are required, heights will be typically 75-80mm. • A specific pedestrian and cyclist trail is proposed through the site, which will facilitate connection to existing and proposed trails in Blarney Town. • The Sunberry Heights access road will be improved to create enhanced pedestrian and cyclist movement.
Public Realm	How safe, secure and enjoyable are the public areas?	<ul style="list-style-type: none"> • 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. • 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.

<p>Adaptability</p>	<p>How will the building cope with change?</p>	<ul style="list-style-type: none"> • All units are designed in accordance with the Guidelines on “Quality Housing for Sustainable Communities”, and the Apartment Guidelines, 2018. • Houses in the development can be easily adapted to the future needs of 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. • For example, provision has been made to extend in the attic in house type 1C (12no.), and the ground floor can be extended to the rear.  <p>The diagram is a cross-section of a house with a gabled roof. The roof pitch is labeled as 12:12 (53.5°). The attic space is shaded green and labeled 'Potential Future Expansion' with a green arrow pointing upwards. The ground floor is divided into a Kitchen/Dining Room, Utility Room, and Living Room. The first floor has two bedrooms and a central hallway. Dimensions of 2000 are indicated for the ground floor and first floor. The house is shown in a landscaped setting with trees and a fence.</p>
<p>Privacy and Amenity</p>	<p>How does the scheme provide a decent standard of amenity?</p>	<ul style="list-style-type: none"> • Each unit has access to generous private amenity spaces in excess of the minimum standards. • All the units have a dual aspect. • Windows are sited to prevent overlooking into adjacent private gardens. • 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. • There are no overshadowing or privacy issues that affect existing houses. • Bike racks and electric car points are spread around the site.

Parking	How will the parking be secure and attractive?	<ul style="list-style-type: none"> 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. 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. 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. There are also 4no. motorcycle bays in the basement of the apartments.
Detailed Design	How well thought through is the building and landscape design?	<ul style="list-style-type: none"> Each dwelling is designed for its location on the site. The external materials of the units were selected to have a positive contribution to the locality and make reference to the local aesthetic. 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 Character Area will provide for a contemporary, yet durable, development whilst respecting the existing buildings adjacent to the site. 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.

Design Report

2.2.5 A detailed design report has been prepared by BRH Design Partners which sets out a design strategy for the site, premised on the following key issues, to including consideration of durable materials:

- The site presents an opportunity to deliver a scheme that makes the most efficient use of serviced, zoned lands, with the northern section of the site kept free from development in accordance with the zoning objective for the site, with a strategic planted belt to reduce the visual impact from Blarney Castle
- A high quality mixed residential development is proposed for the southern part of the site which works as far as possible with the existing contours, with a welcoming and defined edge on entry from Sunberry Drive, laid out in 4 distinctive character areas, each with high quality landscaped public open spaces and a legible and robust network of streets, and pedestrian and cycle pathways to encourage permeability throughout the site
- The routes are animated with active frontages and front doors directly serving the street. The considered street hierarchy favours pedestrians and cyclists over driver

- The overall design references the existing character of residential areas in the vicinity, with dwellings arranged around public open space areas. All areas of public open space are overlooked by the dwellings and apartments which provides extensive passive surveillance throughout
 - Character Area 1: Red brick with elements of modern aluminium cladding are the prominent material which acts of a continuation of the red brick material found in the existing Sunberry Heights development to the immediate East. Prudent consideration is given to a high-quality palette of materials which is also extremely durable, with minimal maintenance and will age in this location. Concrete roof tiles, white render and Grey windows and rainwater goods completed the chosen material palette for this area
 - Character Area 2: Brown brick with a varied range of tones is the prominent material used throughout this area which helps characterise this portion of the development. Prudent consideration is given to a high-quality palette of materials which is also extremely durable, with minimal maintenance and will age in this location. Concrete roof tiles, white render and Beige windows and rainwater goods complete the chosen material palette for this area
 - Character Area 3: Sandstone coloured brick in a variety of tones is the prominent material for this character area and assists in differentiating from the adjoining character areas. Prudent consideration is given to a high-quality palette of materials which is also extremely durable, with minimal maintenance and will age in this location. Concrete roof tiles, white render and Grey windows and rainwater goods completed the chosen material palette for this area
 - Grey brick with a varied range of tones with elements of modern aluminium cladding is the prominent material used throughout this area which helps characterise this portion of the development. The lower end and semi basement of the apartment consists of a dark limestone cladding which compliments the palette of materials further and provides a high end quality finish to the apartment units. Prudent consideration is given to a high-quality palette of materials which is also extremely durable, with minimal maintenance and will age in this location. Concrete roof tiles, white render and Grey windows and rainwater goods complete the chosen material palette for this area
- The proposed apartment block is located to the south of the site, principally because it is the best part of the site to provide an increase in height without compromising the visual amenities of the site and is also the optimum location for a semi-basement car parking area. Equally, the proposed creche has been located on the southern end of the site, principally because it is close to the main access, and also because it is the ideal location for a safe drop-off zone
- The housing form is simple vernacular and follows a defined style, blending materials and colours with new complementary materials to form a subtle mix which expands upon the characteristics of the area. The brick facades bring warmth and texture to the buildings and provide a domestic scale and character to the houses and apartments
- A selection of courtyard type clusters has been designed to provide a sense of enclosure and reduce traffic speeds with tighter corner radii throughout the scheme. Specific corner features have been inserted to address the main corners along the streets and public spaces

- The proposal will provide a positive addition to Blarney retaining a lot of the existing natural topography to maintain the identity of the site along as well as retaining and supplementing the surrounding mature boundary vegetation to maintain the natural distinctiveness of the site
- A consistent, contemporary architectural definition is carried throughout the overall scheme to bring a uniformity and identity while maintaining a simplicity to the elevations. The design strategy employs the use of various shades of brick, where appropriate distributed to provide a robust urban pattern and enliven the visual interest but also durable overtime providing a long life-cycle expectancy. The various tones will be utilised to bring differentiation between areas of the site and the houses and taller 3 storey houses and apartments. Windows will be framed with simple opening sections in a low maintenance finish with a simple contemporary expression. The roofs of the houses are concrete tiles to ensure long life and good weathering with low maintenance. Gutters will run along the eaves line to the rear and front, with downpipes in selected areas to ensure a coordinated elevation. The design will incorporate the latest technologies to achieve the highest standards in energy efficiency.

Pedestrian Connection

2.2.6 A Layout Plan, drawing no. 21_001_P03A, prepared by BRH Design Partners illustrates the existing pedestrian connectivity to Blarney Town Centre. An excerpt of this is illustrated in Plate 8 below:

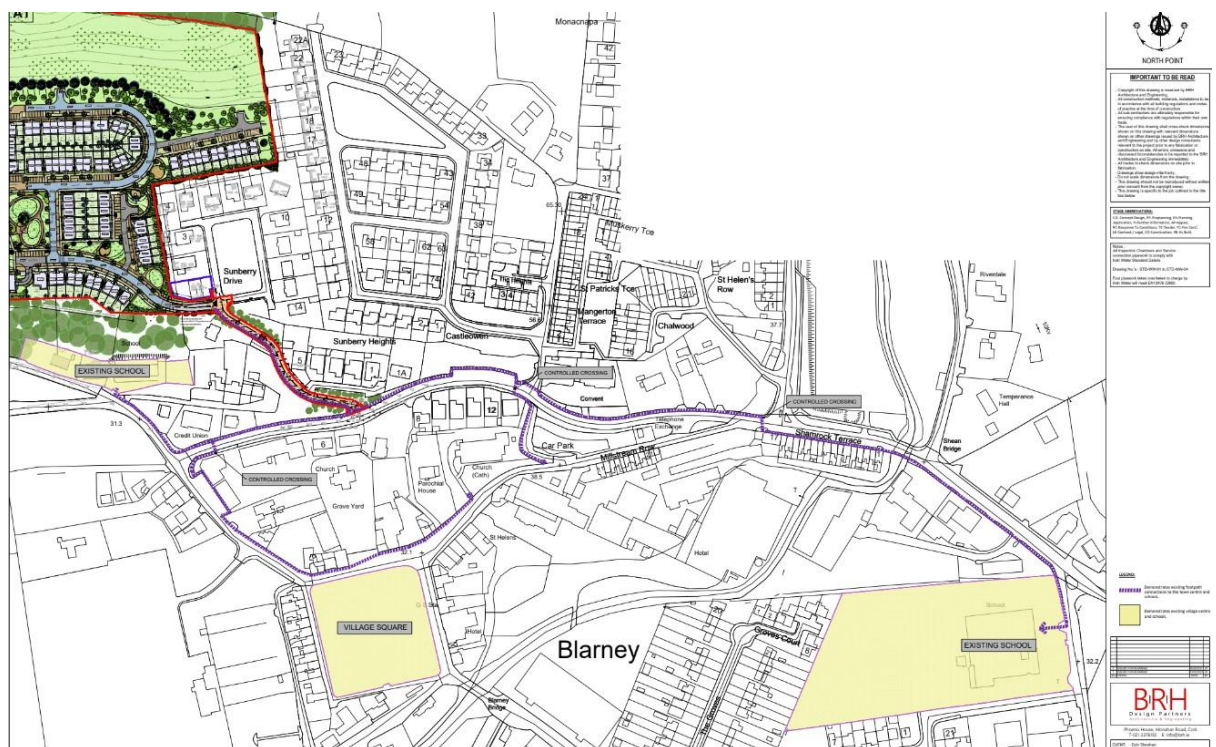


Plate 8: Proposed development site relative to the existing pedestrian connections to Blarney Town Centre

2.2.7 In addition, section 5.0 of the Transportation Assessment report of NRB Consulting Engineers which is included with the application sets out the nature and extent of existing cyclist/pedestrian connectivity, noting specifically that there are continuous footpaths between the proposed development site and both local schools.

Taking in Charge

- 2.2.8 Drawing no. 21_001_P17 prepared by BRH Design Partners illustrates the areas to be take in charge by Cork City Council.

Childcare Demand Report

- 2.2.9 A childcare demand report has been prepared by Coakley O'Neill Town Planning Ltd. This illustrates the existing provision in Blarney and the likely requirement for childcare places arising from the proposed development. The proposed development includes the provision of a 42-child creche (309.66m² (with 258.8m² private open space)) in line with the requirements of the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006. The creche will be constructed in Phase 1 of the proposed development.

School Demand Report

- 2.2.10 A school demand report has been prepared by Coakley O'Neill Town Planning Ltd. This concludes that the school places demand generated by the proposed development can be accommodated within the existing national and secondary schools in Blarney.

Area Engineer and Road Design Reports

- 2.2.11 In relation to the Area Engineer's Report in respect of surface water, 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. OLS has engaged the services of Irish Hydrodata Ltd to undertake 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. The watercourse crosses both roads via precast concrete culvert crossings. 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.

- 2.1.12 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.
- 2.1.13 Furthermore, 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 +33,499.00m³. This material will be disposed of off-site to a licensed facility by a licensed haulage contractor.
- 2.1.14 A SuDS Strategy Report has also 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.
- 2.1.15 In relation to the Road Design Report, the TTA has been prepared by NRB Consulting Engineers in accordance with the TTA Guidelines, which recommends the use of licensed TRICS software to establish Trip Patterns, when using the 'predictand 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 required to increase the applied trip rate, it would have no implications whatsoever for the study conclusions. 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.
- 2.2.16 The planning application is accompanied by a Preliminary Mobility Management 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, as clearly set out within the NRB Reports. In this regard, the TTA includes a dedicated Section "Cyclist & 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.
- 2.2.17 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.

Irish Water

2.2.17 A Statement of Design Acceptance dated 16th September, 2021 has been received from Irish Water in respect of water and waste water services.

Phasing Plan

2.2.18 Section 2.3 of the Design Statement prepared by BRH Design Partners sets out the proposed Phasing Plan, including the delivery of Public Open Spaces, with the large central Public Open Space area to be delivered in Phase 1. Phase 1 also includes the works to the access road and the creche.

Daylight Sunlight and Overshadowing

2.2.19 The report of IES Consulting is included with the application which concludes as follows:

- In relation to daylight analysis, of the 105 points tested to determine if the VSC results of the proposed development are greater than either 27% or 0.8 times their former value, 100% exceed the BRE requirements;
- In relation to shadow analysis, the overall impact of overshadowing can be classified as negligible adverse (the lowest level of impact) given the provision of the site to the west of existing buildings and the low-rise nature of the proposed development;
- In relation to sunlight to existing and proposed amenity spaces,
 - The sunlight received in the neighbouring amenities continues to be the same for the majority of dwelling as the existing scenario when measured against the 2 hours of sunlight on the 21st March. Only two gardens have a negligible difference of 1% and 3%, thus all areas comply with the BRE Guidance;
 - On the 21st March, the majority of the proposed garden amenity areas situated within the proposed development site will receive at least 2 hours of sunlight, in compliance with the BRE Guidelines. Of those that do not comply (23 of 109) it is simply as a result of their north facing position. It is noted that 19% quality public open space is provided across the site. These proposed public amenity areas will receive at least 2 hours of sunlight on 98% of their combined area, this exceeding the BRE Guidelines;
- Across the proposed development, 100% of the tested rooms in the apartments and the dwellings achieve Average Daylight Factors (ADF) above the BRE and BS 8206-2:2008 Guidelines when Living/Kitchen/Dining or Kitchen/Dining spaces are assessed as whole rooms against a 2% target.

Material Contravention

2.2.19 A Statement of Material Contravention has been prepared by Coakley O'Neill Town Planning Ltd. A Medium B Density is defined in objective HOU 4-1 of the Cork County Development Plan 2014 as being 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.

Article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018

2.2.20 An Article 299B Statement is enclosed with the planning application. This statement indicates how the available results of relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account in this proposed Strategic Housing Development located in Monacnapa, Blarney, Cork.

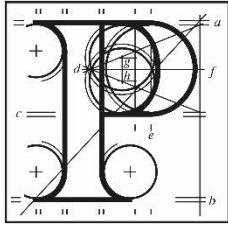
3.0 CONCLUSION

3.1 This document outlines how the matters outlined in the Board's opinion on a proposed strategic housing development at Monacnapa, Blarney, Cork, have been addressed in full by the applicant and design team prior to lodgement of the application to An Bord Pleanála.

4.2 It is respectfully submitted that the proposed development has addressed all the issues raised in the Board's opinion.

APPENDIX 1

BOARD OPINION



An
Bord
Pleanála

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

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 19th 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.

Tom Rabbette
Assistant Director of Planning
July, 2021