

Response to Cork County Council Pre-Application Consultation Opinion

For Development at Courtstown (townland), Little Island, Co. Cork

on behalf of Ruden Homes Ltd.

July 2024



McCutcheon Halley

CHARTERED PLANNING CONSULTANTS

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1. Introduction

This report addresses the specific information requirements and issues raised by Cork County Council (CCC) in their Pre-planning Large Scale Residential Development (LRD) Opinion issued on 18th January 2024 in relation to the proposed LRD at Courtstown (townland), Little Island, Co. Cork comprising the construction of 172 no. residential units, 4 no. commercial units, 1 no. creche and all associated infrastructure and ancillary site development works.

The Opinion issued by the Council was subsequent to a Section 247 meeting which took place on 05th September 2022 and a Section 32B meeting which took place on 13th December 2023.

Following the pre-planning meetings, the Council issued an Opinion in accordance with Section 32D of the Planning and Development Act 2000 (as amended) and advised that a number of items needed to be addressed in accordance with the requirements of Article 4(7) of the Planning and Development Regulations 2017. The specific information requested by CCC and our response to same, is outlined in Section 2 of this report.

2. Information to be submitted with the LRD Application

The specific information requested by CCC (***bold italics***) and our response to same, is as follows):

Objective LI-X-01

- 1. The zoning objective requires that the development of the overall LI-X-01 lands be subject to an approved framework plan for its overall development. Further consideration is required regarding the development potential of all LI-X-01 lands. This is particularly important in relation to transport impacts and in the context of the neighbourhood centre required by the zoning objective, and the stated vision “that development be integrated into the surrounding land uses, to ensure appropriate protection of the adjoining residential land use and to ensure an appropriate landscaping buffer between new residential development and adjoining industrial uses to the east” (s. 2.6.50).***

Policy Objective LI-X-01 states that the development of this special policy area will be subject to an approved framework plan for its overall development. In accordance with this objective, please find attached ‘High Level Development Framework Plan’ prepared by Brady Shipman Martin. This plan has been prepared having regard to the overall LI-X-01 including the subject site and lands to the east and west of the site. A ‘High Level Development Framework Linkages Plan’ has also been prepared by Brady Shipman Martin and illustrates how the proposal will link and align with the wider Little Island area.

It is important to note that the designated X-01 lands consist of two parcels of land which are within different ownerships. Figure 1 shows the extent of the X-01 lands that are within our client’s ownership (indicatively demarcated by dashed black line). The land to the west is within separate ownership.

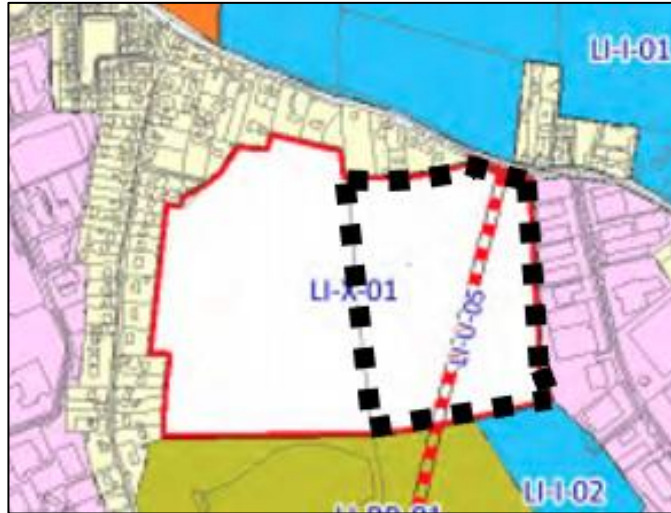


Figure 1: Extent of Applicant's ownership

In order to provide a plan that had regard to the overall X-01 lands, Ruden Homes Ltd. and their planning agent McCutcheon Halley had a meeting with the adjoining landowner (along with their planning agent and traffic consultant) on 29th February 2024. During the meeting, details were provided to the adjoining landowner on the approximate number of units proposed, the location of the creche and neighbourhood centre, location of distributor road and main roads providing connections to adjoining lands. It was noted that the open space areas were being reconsidered following the Opinion received from the Council.

The adjoining owner indicated that they are at an early stage of development, however, they had regard to and took account of the Applicant's proposals. The need to provide a framework plan for the overall lands in response to the Council's Opinion was discussed and it was considered between the two parties that the framework plan would provide details on connectivity, indication of location of non-residential uses and the treatment of the shared boundary through the centre of the overall X-01 lands so that the two landholdings could dovetail in respect of the residential development of these lands. Although the adjoining landowner is at an earlier stage, they indicated they would have regard to the Applicant's proposals and did not challenge it at the time of discussions. Following the meeting, further details of the proposal were provided to the adjoining landowner so they could have regard to the Applicant's proposals when designing and progressing the development of their lands.

It is our understanding that the adjoining landowner recently had a Section 247 meeting with Cork County Council and that a framework plan for the overall X-01 lands was discussed. Given the statutory timeframe to respond to the Council's Opinion, we have prepared a high level framework plan for the overall lands to satisfy the Council's Opinion. However, the Applicant is happy to work with the adjoining

landowner and the Council to facilitate any further development of this as considered necessary.

Having regard to initial discussions with the adjoining landowner, the framework plan was prepared with a focus on the key principles of connectivity and movement, location of a small scale neighbourhood centre and the shared boundary running through the centre of the LI-X-01 lands. Regard was also given to site constraints, topography, archaeology and existing trees and hedgerows. For the lands within our client's landholding, the proposed layout the subject of this application, has been integrated into the framework plan and shows details regarding location of houses, non-residential buildings, roads and open space. For the land to the east (and which is also within our client's ownership), an indicative layout has been provided showing similar details and to demonstrate how it will integrate with the development the subject of this application. This land to the east will be submitted as part of a separate phase 2 development of the site.

For the adjoining landowner's lands, general assumptions were made on movement routes throughout the site and were designed to link with our site. Regard was also had to existing trees and a landscape green corridor was provided along the western boundary. Non-residential elements were provided at the connection points with our site to along a natural for linkage with the non residential element of the proposed scheme, the subject of this application.

It should be noted that the framework plan which covers the adjoining land to the west was prepared in the absence of any site investigations or surveys undertaken for the western part of the X-01 lands. For this reason, general assumptions were made and while we appreciate this may not perfectly align with the adjoining landowners design layout, this framework plan has been prepared to indicate high level spatial arrangements of development that enhances connectivity and permeability.

The Framework Plan should only act as a development guide to the implementation of the Cork County Development Plan 2022 and other relevant statutory documents to illustrate the overall spatial layout of the X-01 lands and how they will link in with the wider Little Island area.

- 2. The zoning objective requires Medium A residential development (30 – 50 units/ha). It is stated that a density of 33 units/ha is proposed but it appears to be 31 units/ha based on the details submitted. Given the existing and planned high quality public transport service for Little Island a minimum net density of 35 units/ha is recommended in accordance with Objective HOU 4-7 of the Cork County Development Plan 2022, and the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024.'**

As requested by Cork County Council and in accordance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024, a density of 39.5 units per hectare is proposed.

3. Demonstrate compliance (by way of detailed report) with the ‘Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024’ as it pertains to inter alia, density, quality urban design and place making, amenity and open space standards and car and cycle parking provision.

Please refer to Section 3.3 of the Statement of Consistency prepared by McCutcheon Halley Planning Consultants which provides a matrix table demonstrating compliance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024.

Please refer to Housing Quality Assessment and the Architectural Design Statement, prepared by Engenuiti Consulting Engineers, which also demonstrates compliance with the Compact Settlement Guidelines.

Site Layout, Design

1. The submission of only part of the landholding, (as per the indicative masterplan) of this subject ‘LRD’ scheme is resulting in a somewhat piecemeal proposal which diminishes the realisation of the full potential of the land holding.

The site, the subject of this application, forms part of an overall phased development for the lands that are within our client’s ownership. Subject to planning being granted for this application, it is our client’s intention to submit a residential application for the eastern part of their landholding. Significant work has already been undertaken in respect of the eastern section of their landholding as evidenced in the reports and this has fed into the preparation of the overall framework plan and the drawing (Ref. no. 10277-PL-005) showing an indicative layout for the future phase two development. This drawing shows an indicative layout for residential development and ancillary roads, paths, open space. Please note this layout is indicative and will be subject to further assessment, site investigation and consultation with the Planning Authority prior to an application being submitted.

2. It is considered that the proposal does not constitute a Responsive Built Form, one of the Key Indicators of Quality Design and Placemaking, as set out in the Sustainable and Compact Settlements Guidelines. The design is dominated by

repetitive street layouts with standard parking arrangements in front of every dwelling. Furthermore, the proposal does not represent an appropriate and diverse mix of housing to provide compact growth and greater housing choice that responds to the needs of single people, families, older people and people with disabilities, (part of Key Indicator).

The proposed layout has been revised to take on board the Council's feedback and also to ensure compliance with the Sustainable Residential Development and Compact Settlement Guidelines 2024.

In our opinion, the submitted layout constitutes a responsive built form. The built form is of a much tighter grain, which is evident by the increase in the number of residential units now accommodated in the site layout (increase of 20 residential units). We have distributed this increase in numbers primarily to expand the number of 2-bedroom units available including provision of 2-bed duplex units to respond to feedback from pre-planning consultations. Separation distances have been reduced from 22m to 16m in some locations as per SPPR 1 of the Compact Settlement Guidelines on separation distances, which has also further reduced certain rear garden sizes to align with guidelines contained within SPPR 2 of the Compact Settlement Guidelines minimum on private open Space for standards for houses. The layout as presented offers a diverse mix of housing comprising the following:

- 5 no. large 4 bedroom detached family homes
- 35 no. large 4 bedroom semi-detached family homes
- 58 no. 3 bedroom semi-detached /end of terrace family homes
- 7 no. 3 bedroom mid terrace family homes
- 41 no. 2 bedroom semi-detached /mid terrace/end of terrace homes
- 6 no. 2 bedroom duplex type apartments
- 3 no. 3 bedroom apartments
- 5 no. 2 bedroom apartments
- 12 no. 1 bedroom apartments

In our opinion, the above residential unit mix represents a housing choice that responds to the needs of single people, families, older persons and people with disabilities.

3. The opportunity for character areas within the design is not realised. A higher density design with more tight grained typologies with smaller gardens / shared external semi-private spaces should be considered to avoid most of the scheme being a standardised 3 / 4 bed semi-detached arrangement. Consideration should be given to some terraced type blocks

where smaller type typologies could be introduced contributing to a healthier mix of unit types.

We have introduced more 3-4 & 5 unit terraced type housing blocks across all three character areas. These terraced unit types contain a number of house type variants offering more diversity of unit choice to the market. As previously noted, the introduction of tighter grained typologies with smaller gardens has resulted in an increase in the overall density by an additional 20 units and which is in compliance with the Compact Settlement Guidelines. Shared / courtyard type car parking has also been introduced to the rear of housing / duplex units 80-93. This also further enhances pedestrian connectivity throughout the site.

4. The dwelling designs throughout the scheme are very similar, with only variations in the colour of the facing brick in each of the character areas. There is a need for greater variety in dwelling design in order to strengthen character areas and provide diversity across the scheme.

Please refer to 'Architectural Housing Design Statement' and the 'Accommodation Design Proposal' prepared by Engenuiti Consulting Engineers which provide details on the design of the proposed development including the character areas as well as the design and variety of units proposed throughout the scheme.

Character Areas 1, 2 and 3 have been clearly defined throughout the scheme and are enhanced by quality open spaces, linear green linkages and home zones to create an inclusive and coherent new community based on best practice urban planning principles, giving residents a sense of place, ownership and identify.

Character Area 1 is defined by the introduction of buff brick to all front elevations. The height of the buff brick to the front elevations is consistent throughout character area 1 across all the different house types. This area also contains a greater variety of residential units across most demographics.

Character Area 2 is a transitional zone between Character Area 1 (North) and Character Area 3 (South), Character Area 2 contains 11 housing units (4 House Types) coupled with 20 apartment units above 4 commercial units and a creche. Character Area 2 also contains the public realm area and includes a children's playground and a MUGA (multi use games area) The dominant exterior finish to the majority of these units is a grey brick finish. The grey brick is a transitional building element which assists the scheme transitioning to character area 3.

Character Area 3 as previously referred to in the above, is of a much tighter grain and density than character areas 1 & 2. The front elevations of the housing units contain a vertical element of grey brick above a high grey brick plinth. The variety of residential units contains 5 varying house & duplex types throughout the character area.

- 5. There is a need for a high quality and attractive neighbourhood centre design to serve the overall development where over-lap / conflict between commercial - retail and residential units is better considered in terms of spatial planning, quality of space, place making and defensibility. The relationship of the buildings, (layout, position and composition) and how they address streets and the public open space (coupled with the parking provision) lacks coherence and legibility. Front and 'rear' elevations or public / private interfaces should be clarified and arranged in an orderly and legible manner. The proposal should include landmark buildings to form and strengthen an urban or townscape structure.**

The overall layout, position and composition of the apartment / commercial block has been redesigned. The new layout and position of the apartment / commercial block in our opinion now suitably addresses the proposed distributor road to the east whilst also successfully addressing the public realm to the west. A large double height archway is incorporated into the design of the apartment/commercial block to facilitate greater pedestrian permeability for pedestrians accessing the public realm from the distributor road to the east. This archway also helps to address the building composition of the eastern fenestration.

There is now clear segregation of car parking between the commercial units and residential units separated by a larger public realm domain running east to west from the aforementioned archway.

The northern elevation of the proposed apartment block contains both a deep recessed private balcony on the eastern side that is then balanced by a full height curtain walling glazed system on the western side. The elevational composition here will provide for a landmark building that is sympathetic in scale and height to the receiving environment and will help strengthen the proposed urban fabric of the neighbourhood centre.

- 6. There are particular concerns regarding the location of 2-bed units above the proposed retail units where a satisfactory level of residential amenity, privacy and defensibility is absent. Better**

provision of step-down housing in the form of 1 and 2 bed units should be considered within the scheme in a more tightly grained nature in suitable low rise apartment blocks that should have good connectivity and linkage to some open green space.

The proposed 2-bedroom apartments above the commercial units are fully compliant with all national guidelines for apartment design. These should not be considered step-down units. The revised proposal offers a number of alternative 2-bedroom housing units which do offer residential amenity, privacy and defensibility for the home owner. To further address the above, we have added a further 6 no. 2-bedroom duplex apartments. These units are strategically located throughout the site to act as wayfinding structures. The majority of all 2-bedroom housing units and 2-bedroom duplex apartments all have good connectivity and linkage to active open spaces. 16 no. 2-bedroom Type C1's housing units are all directly overlooking public open space across the various character areas.

7. Further consideration of the configuration and layout of the commercial units in Block A is required to ensure the units are usable/attractive commercial spaces.

The 4 no. commercial units are designed to offer flexibility of layout to any future end user. All units are proposed to have dual aspect, with primary access from the western side of the building adjacent to the car park and public realm. The commercial units can accommodate direct access from the public footpath adjacent to the distributor road should a future end user require same.

8. The proposal does not present well-defined edges to street and public spaces. In particular, there is a proliferation of unnecessary green verges or incidental landscaped areas to the 5 side of dwellings, (that may be described as left-over spaces). Such verges abut units 26,27 & 39, 32 & 33, 40 & 49, 44 & 45, 58 & 59, 76 & 82, 112, 120 & 150, 144, (not exhaustive list). There are further concerns regarding the configuration of some buildings, exposing the rear elevations to the adjoining public road (i.e., units 120-122 and 150-152).

The revised proposed scheme now offers well-defined edges to both street and public areas. We note that the areas adjacent to units 26 & 27 still contain well landscaped green areas. It is our opinion that these areas require suitably landscaped green verges/areas to present a sense of arrival from the Ballytrasna road junction onto the distributor road. The main entrance is designed not just to serve this proposal but all current and future zoned lands to the south and west. All other green verges (left over spaces) have now been either fully absorbed into the garden areas of the adjacent house units or

the building line has been brought forward to create a stronger streetscape.

9. The parking and vehicular access arrangements of units 29 - 32 & 76 - 82 and relationship with distributor road is a concern.

The above parking and vehicular access arrangements have now been addressed with a redesign of the general area. Parking and vehicular access for these areas is now from the estate road and not off the distributor road.

10. The orientation / configuration of no. 82 to the Ballytrasna Road is a concern, at an important junction and entrance to the proposal.

It is assumed the reference to no. 82 should be a reference to unit no. 26 which is located at the entrance with Ballytrasna Park Road. This particular unit type B2 is a double fronted (book end type) unit, where the primary elevations address both the south elevation and the east elevation (Ballytrasna Junction). It is considered that the presented primary elevation to the aforementioned junction is the preferable design solution as opposed to presenting a blank gable end to the Ballytrasna Junction.

11. The buffer between the development and the adjoining industrial uses to the east required by the zoning objective requires significant further consideration. The proximity of residential development to this boundary indicated in the masterplan for the applicant's landholding is of concern and is unacceptable given the potential for adverse effects on residential amenities, by way of operational noise and emissions, lighting and 'opening' hours incompatible with residential uses, exacerbated by the dominant provision of 'family' homes. There is an opportunity to provide a strategic open space, (in lieu of the entire development site in control of the applicant) ecological buffer and buffer with noise abatement and visual screening qualities to adhere to the required buffer. This may offer scope to achieve required net density for the entire site holding.

A landscape buffer has been provided along the eastern boundary of the application site where it adjoins with the industrial lands to the east. The landscape buffer is shown in the Overall Landscape Plan (6835-300). The landscape buffer comprises of a 2.4-metre-high paladin fence and mixed native hedge planting. A detailed section is provided of this buffer as per 'Landscape Buffer Boundary' drawing (6835-309) prepared by prepared by Brady Shipman Martin.

In terms of the future phase 2 residential development of the lands to the east of the distributor road, it is the Applicant's intention to add on to and extend the current proposed landscape buffer boundary by including an approximate additional 6 metre green corridor/linear park. This is shown in Drawing no. 10277-PL-005, prepared by Engenuiti Consulting Engineers, which shows an indicative layout for the future phase 2 residential development. The future green corridor has also been included in the accompanying Framework Plan, prepared by Brady Shipman Martin.

The current residential proposal is located at a significant distance from the existing Harbour Point Business Park, ranging from approx. 90 metres at its closest and over 200 metres at its furthest point. The buffer proposed as part of this application together with the distance of the application site is considered to be suitably landscaped and fenced and more than appropriate to protect the 172 residential units. As noted, the landscape buffer will be extended as part of the future phase 2 residential planning application and has already been accounted for in the indicative future adjoining layout (Drawing no. 10277-PL-005) as well as the framework plan.

Our client is happy to work with the Council on providing a suitable landscape buffer with adjoining industrial lands to the east and for this to be conditioned with appropriate wording if considered necessary.

12. A complete set of Contiguous Street elevation drawings showing all proposed streets is required.

Please refer to drawing no.'s 10277-PL-020, 10277-PL-021, 10277-PL-022 for a complete set of contiguous street / site elevations.

13. Incidental open space to the rear of unit 58 should be omitted and included within the rear garden of this unit.

The open space referred to has been set aside to allow for a wayleave for ESB networks to maintain an existing ESB pole located to the rear of no. 61. Presently this is an overhead 10KV powerline, as part of this LRD application it is proposed to run this powerline underground to the eastern boundary.

A galvanised gate could be erected in this location to restrict public access to this area, subject to agreement with ESB networks.

14. Details of bin storage proposals for mid-terraced units are required.

Please refer to Drawing No. 10277-PL-041, prepared by Engenuiti Consulting Engineers for bin storage proposals for mid-terraced units.

The bin storage details for the apartments are shown on Drawing No. 10277-PL-40. The bin storage area for each of the duplex units is shown on the individual duplex plans, elevations and sections submitted with this application.

The Housing Quality Assessment Report, prepared by Engenuiti Consulting Engineers, also provided details on the refuse storage arrangements.

Dwelling-house bin storage will be at the rear of houses with full access, to the public road for collection. Dwelling houses that are mid-terrace with no rear access, will have bin storage within the front of their dwelling set back from the public footpath. Apartment bin storage will be adjacent to the apartment buildings and will be allocated by apartment number. The area will be safe and secure yet easily accessible to homeowners. All duplex units have a dedicated secure bin storage area.

15. The location of the bin storage area adjacent to the play area of the childcare facility should be reconsidered.

The central bin storage area is now located within the public realm adjacent to all buildings being served by the bin storage. The location of the bin store is such that it can be accessed from either carpark during collection.

16. Clarity is required regarding the car parking allocation between the proposed retail and proposed apartment units. Minimum provision for residential and non-residential uses across the entire development should be the objective, given the Sustainable and Compact Settlement Guidelines.

The proposed parking allocation between commercial and proposed apartments are now separated by the public realm domain. The commercial car parking is located adjacent to the 4 no. commercial units whilst the car parking for the residential apartments is located adjacent to the creche facility. Minimum car parking provisions have been applied to all uses across the development.

17. Cycle parking for apartments should be provided in accordance with the requirements of Table 12.8 of the Cork County Development Plan 2022. In particular, long stay parking should

be located in a secure area that is easy to access, well-lit and covered.

Long Stay bicycle parking is provided for in a central, secure and easily accessible location within the public realm. The bicycle store is secure and located in a well-lit area. The bicycle store can accommodate 32 no. bicycles (apartment block contains 31 bedrooms).

Short stay bicycle parking is provided by the use of Sheffield type bicycle stands located under the apartment building archway. There is provision for 22 no. bicycle stands in this location equating to 44 bicycle spaces.

18. The overlooking of play area associated with childcare facility by upper floor apartments and balconies is a concern.

With the redesign of the apartment block, all overlooking of the play area associated with the childcare facility have been mitigated against. There are no private balconies and/or habitable rooms overlooking the aforementioned play area.

19. The location of Public Open Spaces should be reviewed. Opens Space A may be better served if moved eastwards and 'swapped' with residential block (units 40-49); Open Space B including playground is poorly defined and its location is deemed inappropriate given its relationship with the Neighbourhood centre blocks; the entire NC block including Res units 112-119 should be reconfigured to form a well-defined perimeter block and creating a well supervised open space. Open Space C is constrained by position and extent but offer some 6 relief along the western boundary. Open Space D does not constitute useable Public Open Space and should be reconsidered with arrangement of adjoining buildings and the distributor road. Units 27-30 may be relocated eastwards to facilitate additional units to the rear of no. 27 for instance.

Public open space A has been moved eastward away from the western boundary. A number of building blocks in this area have been redesigned to accommodate same. It is now located in a more central area within Character Area 1.

Public open space B is now better defined by the relocation and redesign of the apartment / commercial / creche building block, thus allowing for a much larger public realm to be closely integrated into the surrounding areas. This area clearly defines the preferred pedestrian link between character area 1 to the north and character area 3 to the south. Public open space B has a strong defined street edge to the north and south with cycle lanes on both boundaries

allowing for greater integration with the rest of the development. There is an abundance of passive surveillance to this area on all sides.

Please refer to Landscape drawings and Landscape Development Report by Brady Shipman Martin for further details on open space areas and the landscaping strategy.

Landscaping and Boundary Treatment (Ecology)

1. Street tree planting should be updated in line with the All-Ireland Pollinator Plan or to include native species only.

The All-Ireland Pollinator plan does not prescribe that only native species of planting are grown. The Pollinator Friendly Planting Code¹ states the following with regard to species selection:

“Deliberately planting horticultural or ornamental plants

Important: *In towns and villages non-native horticultural or ornamental plants can be an important additional food source for pollinators. It is important to choose species that are good sources of nectar and pollen. However, you should not plant these in natural or semi-natural habitats. They should also not be planted in farmland (outside of farm gardens).”*

Furthermore, the Pollinator Friendly Planting Code states:

“We have provided lists of pollinator friendly trees, shrubs, climbers, perennials, annuals and bulbs. Please note that these are not exhaustive lists. There are lots of other species that are also pollinator friendly and could be incorporated where appropriate. The best guide is to observe what the bees themselves are feeding on in parks/gardens and to increase the amount of these plants.” It is notable that a number of the tree species listed in the AIPP Planting Code are not native species.

In addition, we would refer to guidance from Tree Council of Ireland that emphasises “The Right Tree in the Right Place!”² which states:

“Planting the right tree in the right place is the most important decision facing tree growers. Correct matching of species with sites and soils ensures that trees are growing in the right environment and will perform well with minimum maintenance.

Mistakes made in species selection will result in poor growth performance and eventual losses, no matter how well trees are maintained.”

¹ “Pollinator Friendly Planting Code”, National Biodiversity Data Centre, see: <https://pollinators.ie/wp-content/uploads/2022/12/Pollinator-Planting-Code-Guide-2022-WEB.pdf>

² “The Right Tree in the Right Place!”, Tree Council of Ireland. See: <https://www.treecouncil.ie/the-right-tree-in-the-right-place>

As stated on page 6 of the Landscape Design Report submitted with the application, the landscape strategy described under Section 3. 'Proposed Development' includes the aim to:

"Increase site biodiversity through the use of native and ornamental seasonal, non-invasive, adaptive planting that supports multifunctional external space to provide benefits to people. Measures include planting that combines protection and enhancement of the environment for pollinators as set out in the All Ireland National Pollinator Plan, with green solutions for surface water drainage integrated into open spaces and streets."

The proposed development is comprised of buildings and associated infrastructure located in an urban/peri urban context. The Tree species as identified on the Landscape Plan 1/2 and 2/2 and shown on page 12 of the Landscape Design Report have been selected to perform in accordance with their environment, specific location and function in the scheme. Native tree species are proposed in open space areas and boundaries of the development. Native trees are not selected as street trees, as they are typically unsuitable in these situations. Tree species are selected instead that are better able to cope with microclimate, localised air pollutants and more extreme temperature and moisture fluctuations than typical Irish native tree species.

- 2. Wildflower mixes are generally not supported. There should be a more naturalised approach to generation of wildflower meadows. However, where the seedbank is likely to be limited and a wildflower mix is proposed Design by Nature seed mix is acceptable. Consideration should be given to more perennials and species known to occur in the local area should be considered.**

As the proposed development site will be entirely redeveloped and a construction site, it is not practicable to take a naturalized approach to regeneration of meadow areas. The disturbance of topsoil through stripping, storage and respreading on site will most likely lead to proliferation of pernicious weed growth that would outcompete natural regeneration of native grassland and wildflower species.

The proposed landscape strategy is to seed recreational open space with amenity grass suitable for the intended use by residents. The proposed meadow type seed mix (Type 1 - Shade/semi-shade areas under trees described in Landscape Design Report) will be planted in limited and specific locations at the edges of open spaces and under trees. This mix is comprised of 28 perennial native species.

A native flowering lawn mix (Type 2 - described in Landscape Design Report) is specified for road and street verges, which will include common species of perennial grass and wildflower species typical of the local area. The mix is specifically blended to allow it to be maintained at different heights, which creates a diverse mosaic of flowering species within the verge.

- 3. The Boundary Treatment Plan is not sufficient. It does not show proposed boundary treatment across the entire site. The Plan should clearly identify boundary treatment distinct from landscaping proposals for ease of legibility. Where a mix of wall and railing are proposed a sample elevation drawing of same is required. Further clarity is required in relation to the proposal for a 2m to 1m high transition wall. The Boundary Treatment Plan should be consistent with the Landscaping Plan.**

Please refer to Boundary Treatment Plan (10277-PL-033) and Boundary Treatment Details (10277-PL-034) prepared by Engenuiti Consulting Engineers for further details, which shows both landscaping boundary treatments along with boundary treatments distinct from the landscaping proposals. Elevations and sections are also provided for the boundary treatments including where there are a mix of wall and railing along with an elevation clarifying the 2m to 1m high transition wall.

Please also refer to 'Northern Boundary' drawing (6835-305) and 'Landscape Buffer Boundary' drawing (6835-309) prepared by prepared by Brady Shipman Martin.

- 4. Clarity is required regarding the boundary treatment between unit no. 26 and the public footpath at the entrance to the development.**

Please refer to Boundary Treatment Plan (10277-PL-033) and Boundary Treatment Details (10277-PL-034) prepared by Engenuiti Consulting Engineers for further details. This shows the boundary treatments for all units including unit no. 26. A 2-metre, high boundary wall with block wall capped with brick is proposed to be provided between unit no. 26 and the public footpath at the entrance to the development.

- 5. Boundary treatment to the play area associated with the childcare facility should be clarified.**

Please refer to Boundary Treatment Plan (10277-PL-033) and Boundary Treatment Details (10277-PL-034) prepared by Engenuiti Consulting Engineers for further details. A 1.2 metre, high railing is proposed to the play area associated with the childcare facility.

6. The provision of further Nature Based Solutions, for example, through the provision of bioswales along the central access road and there is also an opportunity to provide further habitat enhancement at this location.

The clarification received from Cork County Council (email 04/06/24) states that this comment refers to the proposed distributor road as part of a first phase of route LI-U-05 in the Cork County Council Zoning Plan.

We respond as follows:

Drainage engineer advice is that bioswales along this route will have minimal benefit in contributing to sustainable surface water strategy. From experience over many years, it is also likely that roads maintenance will likely prefer bioswales alongside a road of this type to be finishes on mown/short grass only with as few larger species of plant or trees within the bioswale to make them as easy to maintain as possible. This would likely lead to an outcome that is of minimal value in SUDs or biodiversity.

We propose that the verges are seeded with a native floral short cut grass mix. This can be managed through reduced mowing to establish a biodiverse mix of grass and native wildflower. This proposal is in line with All Ireland Pollinator Plan guidance for public roads. It also ensures the avenue trees along the route can be planted to add to the multifunctional GBI benefits that this part of the proposed development will provide.

7. There is concern that the western boundary vegetation is at risk of removal / failing due to the proximity of development. Tree / vegetation survey should be submitted with overlap of the proposed layout, clearly indicating what specimens are to be felled, retained, or managed.

There is no intention to remove existing vegetation along the western boundary of the proposed development site.

Please refer to Tree Constraints Plan (RH-TS-001) and Tree Protection Plan (RH-TS-002), prepared by Arbor Care. An overlay of the proposed development has been included in the Tree Protection Plan drawing along with the tree / vegetation survey of existing trees and vegetation along the boundary.

Servicing and Surface Water Disposal

1. The pre-connection inquiry is dated 09/07/2020. The applicant should satisfy themselves it is still valid.

Please refer to updated pre-connection enquiry letter from Uisce Éireann (dated 20th June 2024) confirming confirmation of feasibility.

2. A flood risk screening assessment and drainage impact assessment should be carried out in accordance with Objective WM 11-15 of the Cork County Development Plan 2022.

Please refer to Flood Risk Assessment prepared by MMOS Consulting Engineers, which demonstrates compliance with the core objectives of the Planning System and Flood Risk Management Guidelines. The report concludes that there is no risk of flooding affecting the site area from tidal or fluvial sources and that the proposed development will not increase the stormwater runoff rate when compared to the existing site and satisfies the requirement of the SFRA (Strategic Flood Risk Assessment) to reduce flooding and improve water quality.

A Drainage Impact Assessment has been undertaken by MMOS Consulting Engineers and is included at Section 2 of the Civil Engineering Report.

3. The drainage impact assessment should align with the landscaping proposals and ecology enhancement proposals and demonstrate net biodiversity gains.

Noted. The Drainage Impact Assessment has been prepared by MMOS Consulting Engineers and has been prepared having regard to and to align with the landscaping proposals and the ecology enhancement proposals.

4. Further detail is required on the individual elements of NBS/ SUDS solutions for the development which should optimise opportunities for same taking account the site characteristics and the requirements of Objective WM 11-10 of the Cork County Development Plan 2022. Detailed design proposals should be provided in respect of Sustainable Drainage Systems (SUDS) measures that will be implemented to address issues of surface water quality and volume, which should include measures such as permeable paving, swales, green roofs, rainwater harvesting, rainwater gardens and tree pits, detention basins, ponds, and wetlands.

Please refer to Civil Engineering Report prepared by MMOS Consulting Engineers for further details.

Noise

1. Inward noise mitigation measures to the eastern boundary do not appear to have been considered. This relates to requirement for buffer zone with Industrial lands and should align with

ecology and landscaping plans. A planted 10-metre-wide strip along eastern boundary may be appropriate (for visual amenity, screening, and support ecology/ biodiversity).

A landscape buffer has been provided along the eastern boundary of the application site where it adjoins with the industrial lands to the east. The landscape buffer is shown in the Overall Landscape Plan (6835-300). The landscape buffer comprises of a 2.4-metre-high paladin fence and mixed native hedge planting. A detailed section is provided of this buffer as per 'Landscape Buffer Boundary' drawing (6835-309) prepared by Brady Shipman Martin.

In terms of the future phase 2 residential development of the lands to the east of the distributor road, it is the Applicant's intention to add on to and extend the current proposed landscape buffer boundary by including an approximate additional 6 metre green corridor. This is shown in Drawing no. 10277-PL-005, prepared by Engenuiti Consulting Engineers, which shows an indicative layout for the future phase 2 residential development. The future green corridor has also been included in the accompanying Framework Plan, prepared by Brady Shipman Martin.

Our client is happy to work with the Council on providing a suitable landscape buffer with adjoining industrial lands to the east and for this to be conditioned with appropriate wording if considered necessary.

Traffic and Transport (Sustainable Travel Unit)

- 1. The submitted Traffic and Transport Assessment is considered to be inadequate. The proposed development infrastructure would provide access for traffic generated by further zoned lands and infrastructure identified in Cork County Council's Cork County Development Plan 2022 to 2028. Infrastructural objectives LI-U-02 and LI-U-05 supports the development of the subject and adjacent zoned lands.**

A revised Traffic & Transportation Assessment, prepared by MHL Consulting Engineers, has been submitted which includes a developed Masterplan for the LI-X-01 and LI-RR-01, Scenario 2. Revised traffic counts have been used which were carried out after the opening of the Dunkettle Little Island Access Arrangement and would therefore reflect as close as possible revised traffic flows in the area. In addition to including trip generation based on the TRICS database for the above zoned lands, background traffic flows have been factored using TII general growth estimates which account for additional growth in the surrounding area.

- 2. The implications of the proposals in the context of the Masterplan area (LI-X-01 and LI-RR01) and related CDP objectives have not been included in the assessment and are required to assess the proposal. The submitted Traffic and Transport Assessment includes a predicted 2040 scenario; however, the modelled future road infrastructure doesn't include the CDP objectives. Furthermore, the future baseline traffic volumes appear to be based on TII general growth estimates and not on the significant site capacity, permitted development, or the masterplan zoned lands. (TII figures are an under-estimation of the County Development Plan).**

The revised TTA presents a number of scenarios for both the proposed development junction, Junction 1 and Junction 2: R623/Ballytrasna Road Junction.

- 3. The R623/ Ballytrasna Road junction currently experiences congestion leading to queuing and delays during peak periods. The development of the (X-01 and RR-01) zoned lands will increase queuing and delays. This has been assessed in the submitted documentation; however, the modelling is limited to the junction as a standalone assessment and does not include for redistribution of traffic as a result. The potential impact on Island Cross Junction (R623/ Sitecast/ Post Office Road Junction) to the south hasn't been included in the submitted assessment. The impact on this junction is of particular importance in the context of the new R623 access to Dunkettle Interchange (Q-link), the masterplan area, and the CDP objectives LI-U-02 and LI-U-05.**

New traffic counts for the main junctions, Junction 2 and Junction 3: Island Cross Junction were used in the latest assessment. These counts were carried out in September 2023 when the Dunkettle Little Island Access junction (Q-Link) was open to traffic. Trip distribution diagrams showing traffic flows at each of the recorded junctions have been produced in the TTA indicating that the Island Cross Junction is not significantly impacted by development traffic based on recorded flows.

- 4. Trip generation rates used for the assessment are low, at approximately 50% of expected rates. Further reductions to these rates have been assumed based on CCC's planned sustainable transport Interventions, which are currently progressing toward construction phase. The impact and potential for redistribution is, therefore, underestimated and requires revision.**

Trip Generation rates used are in accordance with the TRICS database and are comparable to recorded flows for residential estates.

- 5. The applicant has not included sufficient detail of the integration of the proposed access junction with the permitted CCC sustainable travel interventions current layout. These measures include pedestrian, cycle, and bus infrastructure along Ballytrasna Road. The final proposed access layout would require amendments and it is unclear if the layout would require significant alterations or lands outside of the 'red-line boundary'. Further details are required in this regard.**

We have complied with the guidance as per the Opinion and have discussed the proposal with the Sustainable Transport Unit of Cork County Council. We have incorporated their advice and have designed the junction to take the form of a traffic signal controlled 'T' Junction and to integrate with future planning infrastructure works for Ballytrasna Park Road, as shown on the Site Layout Plan (10277-PL-003) and the Site Entrance General Arrangement Layout (10277-PL-030). The proposal incorporates what we understand to be the Sustainable Transport Unit's requirements. Please note that the Applicant is happy to work with the Council in finalising the design along the public road to ensure it integrates with the final infrastructure works to be carried out by the Council.

- 6. Accordingly, it is considered that further analysis and design is required to assess the application, the scope of which shall be agreed in writing with the Sustainable Travel Unit.**

The TTA includes an assessment of Junction 2 with the proposed LITS public transport interventions in place, a bus only route accessing through the Eastgate Retail Park. We have complied with the guidance as per the Opinion and have discussed the proposal with the Sustainable Transport Unit of Cork County Council. We have incorporated their advice and have incorporated what we understand to be their requirements.

EIA Screening

- 1. Provide EIA screening report which should have regard to the criteria set out in schedule 7 and (7a) of the Planning & Development Regulations (2001 as amended) and take account of the potential cumulative effects with permitted and planned residential schemes in north Midleton / Water Rock.**

Please refer to EIA Screening Report prepared by McCutcheon Halley Planning Consultants. The proposed project does not meet the thresholds as prescribed within the category 'Infrastructure Project' set out in Schedule 5, Part 2, (10) (b) of the 2001 Regulations, and therefore the project does not require a mandatory EIA as set out in Schedule 5. With proposed mitigation measures in place, it is not

anticipated that the construction or operational phases of the proposed development, whether considered on its own or together with in-combination projects or plans, will give rise to likely significant environmental effects. Having regard to the nature, extent, and characteristics of the likely impacts identified for the construction and operational phases, it is considered that the proposed development will not give rise to a likely significant environmental effect and accordingly a sub-threshold EIA is not required.

Please note that as per the request of the Opinion, we have included a section in the report which takes account of the potential cumulative effects with permitted and planned residential schemes in North Middleton / Water Rock.

Having regard to the distance of the subject site from North Middleton / Water Rock; that there would be no overlap of local infrastructure services; no pathway having been identified by which any plan or project could have a significant in-combination effect on European sites; and that these areas would have all been assessed as part of the Council's Strategic Environmental Assessment Environmental Report; it is not considered likely, therefore, that the construction and operation phases of the proposed development will result in significant cumulative/in-combination impacts with North Middleton / Water Rock.

We consider that the reference to North Middleton / Water Rock may have been a typo and that it possible meant to refer to permitted and planned residential schemes in Little Island. For this reason, we have also taken account of the potential cumulative effects with permitted developments in Little Island as well as planned residential development for the LI-X-01 lands and the residential reserve land zoned under Policy LI-RR-01. The report concludes that it is not considered likely, therefore, that the construction and operation phases of the proposed development will result in significant cumulative/in-combination impacts.

Archaeology

- 1. The applicant is required to engage the services of a suitably qualified archaeologist licensed under the National Monuments Acts 1930–2004) to carry out an Archaeological Impact Assessment of the development site including a Geophysical Survey and licensed archaeological testing.**

This archaeological assessment shall:

- Examine the known and predicted archaeological environment.**

- Evaluate the proposed development in terms of the impact (direct and indirect) of the proposed works on existing or predicted archaeology.
- Carry out a Geophysical Survey.
- Carry out a program of archaeological testing incorporating any anomalies identified in the Geophysical Survey and archaeological testing at regular intervals aiming to cover 12% of the site.
- Propose a strategy to mitigate the adverse effects of the development on the archaeological heritage.
- The archaeologist should carry out any relevant documentary research and inspect the site.

The archaeologist is advised to submit the testing plan/methodology to the County Archaeologist in advance of the archaeological excavation license application to the National Monuments Service. In the event, that archaeological material is found during the course of the testing, the archaeologist shall immediately notify the Local Authority Archaeologist and NMS to agree a mitigation strategy.

Having completed the work, the archaeologist shall submit a written report with clearly labelled drawings (including a plan of archaeological sites/ features overlaid with the proposed development) to the Planning Authority and to the NMS for consideration. Where archaeological material is shown to be present, avoidance, preservation in situ, preservation by record (excavation) and/or monitoring may be required and the Planning Authority and NMS of the Department of Housing, Local Government and Heritage will advise the applicant with regard to these matters.

Please refer to Archaeological Impact Assessment prepared by Lane Purcell Archaeology. A Geophysical Survey Report has also been prepared by Target Archaeological Geophysics Ltd. and is appended to Archaeological Impact Assessment.

The Archaeological Impact Assessment has been prepared having regard to the information requested in the Opinion and confirms that there are no recorded archaeological sites within the proposed development site. A geophysical survey was undertaken on the entire field in April 2024. No responses of definite archaeological character were noted in the survey, however, responses of potential significance were identified, most notably a curvilinear anomaly (referred to as Anomaly A in the accompanying report) at the southern end of the field. This anomaly lies at the southeastern edge of the proposed development site.

Following completion of the geophysical survey, an extensive program of archaeological testing has also been agreed with Cork County Archaeologist, Annette Quinn – a copy of the test trenching layout is provided at Figure 12 of the accompanying report. A licence application for archaeological testing has been submitted to the National Monuments Service (NMS), Department of Housing, Local Government and Heritage.

It should be noted that the layout of the proposed distributor road, accessing the adjoining land to the south, was moved to the west to accommodate the preservation in situ of the anomaly. The anomaly, as identified in the geophysical survey, will be preserved in situ within a buffer zone (minimum radius 5m from the nearest element of the development).

Section 6 of the Archaeological Impact Assessment also provides mitigation measures to mitigate impact on any subsurface archaeological deposits that may exist on the proposed development site and will be subject to the approval of Cork County Council and the NMS.

Public Lighting

- 1. The public lighting plan is inadequate. The applicant shall ensure that the landscape design drawing correlates with the public lighting design layout for the development. Lighting column locations within the landscape drawings differ from the locations within the public lighting design. Applicant needs to revise.**

The landscape drawings have been designed and prepared in co-ordination with the public lighting drawings and the landscape drawings therefore correlate with the public lighting design layout proposed for the development.

- 2. As a result of Item 1, the applicant needs to carry out a cross check between the location of the lights and trees, to ensure that no tree is within 10m of a light, so that the lights can operate effectively. This needs to be reflected in a re-design of both the lights and the landscaping.**

The proposed landscape plan is updated to coordinate proposed tree locations with proposed lighting units.

Proposed trees have been located outside the 10m zone of light units wherever possible. The 10m exclusion zone for each light fitting has been included on the duct drawing (20152-PL-002).

The proposed tree planting layout is designed in accordance with the best practice guidance as noted at Appendix 2 starting on page 31 of the Landscape Design Report. This approach selects tree species and forms in the street that minimise grown spread and density to ensure that the characterful green streets that respond to Cork County Development Plan objectives for Green Infrastructure, response to Climate Change and delivering the quality of places sought in sustainable urban design guidance are achieved. The approach applied to this development has been acceptable in other approved Cork County Council residential schemes.

3. The applicant shall revise the Horizontal Illuminance (lux) for Grid 2 – Spine Road from a P3 to a P2 Class.

As requested, the horizontal illuminance on the spine road has been changed to P2 Class.

Please refer to public lighting drawings, prepared by Horizon Engineering Consultants Ltd, for further information.

4. At the southern end of the Residential Spine Road, the applicant shall show an additional lighting column as the lighting lux contours does not extend to the red line boundary which would result in a dark area.

As requested, an additional column has been shown at the Southern end of the Spine Road for future continuation. This is shown as column 52 on the public lighting drawings that accompany this application.

5. The applicant shall revise the lighting design around Unit No. 26 on the northern end of the site. Applicant shall ensure that the maximum values of the vertical illuminance on properties is not exceeded as per Table 3 within GN 01/21 for the reduction of obtrusive light.

The column layout at the entrance has been revised to deal with the obtrusive light at unit 26.

6. The applicant shall provide a lighting design for the walking/ ped connection to adjacent site, Harbour Point Business Park as per the site layout plan.

It should be noted that the below strip of land within the red line, to which the opinion is referring to, has been included to facilitate connection to infrastructure services as detailed in the civil engineering report and drawings. It is also anticipated that the beginning of this strip will be incorporated and aligned into the future

phase 2 residential development to facilitate vehicular and pedestrian access.



The strip of land within the red line and coloured yellow (far right) is only proposed for the purposes of facilitating connection to Uisce Éireann public infrastructure services along the Harbour Point Business Park road. It is not proposed as part of this application to provide a pedestrian connection into the business park. Furthermore, a landscape buffer and fence are proposed along the eastern boundary of the LI-X-01 lands which adjoin the business park, which is specifically requested by Policy Objective LI-X-01 to provide appropriate buffer between the residential zoned land and the adjoining industrial business park.

For the purposes of responding to this item of the opinion, a separate lighting design has been provided for the strip of land connecting from the proposed residential development, the subject of this application, into the future phase 2 residential development to demonstrate that this can be complied with. This has been calculated separately to avoid overlap with the main traffic design and is included at the end of the Public Lighting Design Report (20152-DD-001-REVL), prepared by Horizon Engineering Consultants Ltd. Please note the detail of this particular strip will be addressed in greater detail as part of a future planning application for the phase 2 lands.