



COAKLEY O'NEILL  
town planning

# CREAMFIELDS

Statement of Response to An Bord Pleanála Opinion in  
respect of the proposed  
Creamfields SHD, Cork

Prepared in February 2022 on behalf of

**Watfore Limited**

Coakley O'Neill Town Planning Ltd.

## Document Control Sheet

<b>Client</b>	Watfore Limited
<b>Project Title</b>	Creamfields SHD
<b>Job No.</b>	CON20051
<b>Document Title</b>	Statement of Response to ABP Opinion
<b>Number of Pages</b>	30

Revision	Status	Date of Issue	Authored	Revised	Signed
1	Draft	16 <sup>th</sup> February 2022	AOC	ND AON	<i>Ad O'Neill</i>
2	Final	22 <sup>nd</sup> February 2022	AOC	ND AON	<i>Ad O'Neill</i>

### Confidentiality Statement

*This report has been produced for the exclusive use of the commissioning party and unless otherwise agreed in writing by Coakley O'Neill Town Planning Ltd., no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. No liability is accepted by Coakley O'Neill Town Planning Ltd. for any use of this report, other than for the purposes for which it was originally prepared and provided. Opinions and information provided in this report are on the basis of Coakley O'Neill using due skill, care and diligence in the preparation of same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to Coakley O'Neill Town Planning Ltd. has been made.*

*Maps reproduced under Ordnance Survey Ireland Licence Number CYAL50188676.*

## 1.0 INTRODUCTION

- 1.1 Pre-application consultation under Section 5 of the Planning and Development (Housing) and Residential Tenancies Act 2016 (Case Reference ABP-311166-21) took place on 7<sup>th</sup> October, 2021 between the applicant, Watfore Limited, representatives acting on behalf of Watfore Limited from Reddy Architecture and Urbanism, Cunnane Stratton Reynolds, Arup Consulting Engineers and Coakley O'Neill Town Planning Ltd, An Bord Pleanála ('the Board') and Cork City Council. This occurred remotely via Microsoft Teams in relation to a proposed Strategic Housing Development at the former CMP Dairy Site, Tramore Road and Kinsale Road, Co. Cork.
- 1.2 The Board's Notice of Pre-Application Consultation Opinion (hereafter referred to as 'the opinion') was issued on 22<sup>nd</sup> December 2021 and is enclosed within Appendix C of the Planning Report and Statement of Consistency prepared by Coakley O'Neill Town Planning Ltd in respect of the proposed development.
- 1.3 The opinion from the Board stated that *'the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.'*
- 1.4 The opinion further states that:

*"An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development."*

### **1. Delivery of pedestrian and cycle links**

*Clarification at application stage as to the provision of pedestrian and cycle connectivity from the development site to the closest bus stop and Black Ash Park and Ride. Any impediments to such connections should be clearly identified and proposals submitted as to how such impediments are to be overcome.*

### **2. Development Strategy**

*Further justification for the height strategy, integration with the wider area and density, specifically how transition occurs in terms of design, presentation, quality community and place making. A key issue at this location is the existing environment and specifically how transition occurs between the existing established development and the proposed development cognisance being had that this development will form a catalyst for future development on surrounding lands.*

*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. *An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The statement should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries. The statement should be supported by contextual plans and contiguous elevations and sections.*
2. *A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory plan for the area other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000*
3. *A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.*
4. *A Traffic and Transportation Impact Assessment.*
5. *Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.*
6. *Justification of quantum and quality of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standards, provision of play spaces, hard and soft landscaping and planting details.*
7. *A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:*
  - (i) *Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.*
  - (ii) *A Shadow Impact Assessment of the proposed development on the wider area.*

8. *A response to matters raised within the PA Opinion submitted to ABP on the 14th of September 2021 in particular, section 2.9 'Building a community', in relation to quantum of resident services and amenities.*
9. *As per SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020 the development must be described in the public notices associated with a planning application specifically as 'Build to Rent' housing development and a covenant/legal agreement is required at application stage for BTR development.*
10. *A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.*
11. *Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission dated 20th September 2021.*
12. *A response to issues raised in the Drainage Planning Report, and the Transportation Planning report undated, accompanying the PA Opinion submitted on the 14th September 2021.*
13. *An AA screening report, which inter alia, considers potential impacts on all of the Qualifying interests (QI's) of all Natura 2000 sites identified as being within the zone of interest.*
14. *A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.*
15. *Site Specific Construction and Demolition Waste Management Plan.*
16. *Details of public lighting.*

*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:*

1. ***Irish Water***
2. ***Irish Aviation Authority (IAA)***
3. ***National Transport Authority (NTA)***
4. ***Transport Infrastructure Ireland (TII)***

5. ***The Minister for Culture, Heritage and the Gaeltacht,***
6. ***The Heritage Council***
7. ***Department of Education***
8. ***An Taisce — the National Trust for Ireland***
9. ***Cork City Childcare Committee.***

1.5 This report sets out the applicant's response to the Board's opinion. Section 2 of this report sets out how the applicant proposes to respond to the 18 no. specific items raised by the Board in its opinion.

## 2.0 STATEMENT OF RESPONSE TO ITEMS RAISED

2.1 This section sets out how the applicant proposes to address the 18no. specific items raised by the Board in its opinion, as follows:

### 2.2 Main Item No. 1 – Delivery of pedestrian and cycle links

*Clarification at application stage as to the provision of pedestrian and cycle connectivity from the development site to the closest bus stop and Black Ash Park and Ride. Any impediments to such connections should be clearly identified and proposals submitted as to how such impediments are to be overcome.*

2.2.1 A Traffic and Transportation Assessment and Mobility Management Plan has been prepared by Arup Consulting Engineers and is included as part of this planning application.

2.2.2 As the Traffic and Transportation Assessment and Mobility Management Plan explains, the Black Ash Park and Ride facility on the Mick Barry Road is the closest bus stop to the site of the proposed development, being located within 250m of the site of the proposed development. It takes less than 5 minutes to walk from the subject site to the Black Ash Park and Ride, with the Park and Ride being served by bus route no. 213.

2.2.3 Mick Barry Road is a single carriageway local connector which connects the Kinsale Road to the N27. There is an existing footpath that connects the Black Ash Park and Ride bus stop to the development site, and at the junction of Mick Barry Road and Kinsale Road traffic signals are available which provide pedestrian phasing in the signal cycle.

2.2.4 A pedestrian link on Mick Barry Road from the Kinsale Road junction to the Black Ash Park and Ride was recently constructed by Cork City Council. A 2.0m wide footpath is currently available from Kinsale Road up to the site of a commercial property access immediately west of the Park and Ride facility. There is no pedestrian crossing facility available across either the commercial property access or the Park and Ride car park access.

2.2.5 As part of this planning application, it is proposed to provide a formal pedestrian crossing across the commercial property access to provide pedestrian priority and to continue the pedestrian route up to the Park and Ride pedestrian access, which is located just east of the vehicular access.

- 2.2.6 Furthermore, it is understood that public funding from the National Transport Authority (NTA) has been approved in principle for improved pedestrian and cyclist infrastructure that will link Kinsale Road to Tramore Valley Park. In the future, this infrastructure will further improve pedestrian connectivity with the Park and Ride Facility along its route and also provide a cyclist route to same.
- 2.2.7 Figure 1 below illustrates the proposed upgraded pedestrian crossings on the Mick Barry Road. Please refer to the accompanying Traffic and Transportation Assessment and Mobility Management Plan, Drawing No: 252666-ARUP-ZZ-XX-DR-CH-1001, as well as the general plans and particulars of the proposed development for further detail.

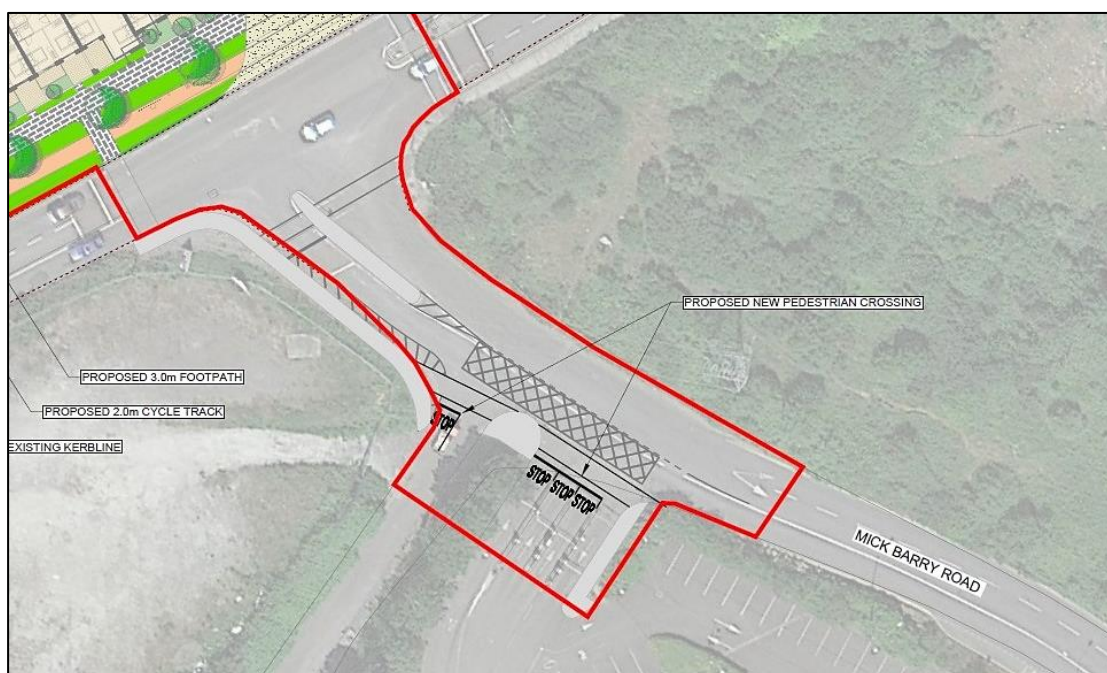


Figure 1. Proposed new pedestrian crossings on the Mick Barry Road. (Credit: Arup, 2022).

- 2.2.8 Appendix C of the accompanying Traffic and Transportation Assessment and Mobility Management Plan prepared by Arup provides evidence of the continuous footpaths and cycle lanes to the existing bus stops serving route nos. 203 and 219 located within 15 minutes of the proposed development site.

### 2.3 **Main Item No. 2 – Development Strategy**

*Further justification for the height strategy, integration with the wider area and density, specifically how transition occurs in terms of design, presentation, quality community and place making. A key issue at this location is the existing environment and specifically how transition occurs between the existing established development and the proposed development cognisance being had that this development will form a catalyst for future development on surrounding lands*

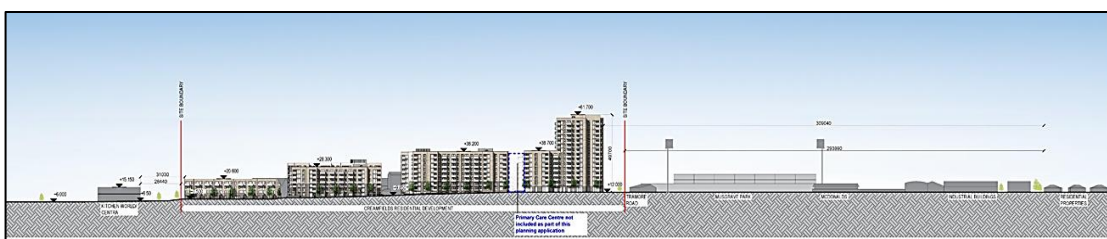
- 2.3.1 Reddy Architecture and Urbanism has prepared an overall development strategy pertaining to the proposed development, which is included in the Architectural Design Statement. Hereunder, we outline the response they have prepared in relation to the above item.

- 2.3.2 Firstly, it must be stated that the Board's opinion was based on the scheme that was presented at the pre-application consultation, on 7<sup>th</sup> October 2021, which consisted of 706 no. dwellings. On foot of the tripartite pre-application consultation meeting of 7<sup>th</sup> October, 2021, and as advised by the Board, a further consultation with Cork City Council took place on 18<sup>th</sup> October, 2021 via Teams to discuss revised proposals to include a reduced density and increased typology at the southern end of the site.
- 2.3.3 The resultant revised scheme consisted of 609 no. dwellings, resulting in a reduction of 97 no. units from that discussed at the tripartite meeting of 7<sup>th</sup> October, 2021. This revised scheme also reduced the density from 240 units/ha to 180 units/ha, a reduction of 25%. The revised scheme also has significantly reduced heights at the southern end of the site, by the elimination of 7- and 8-storey buildings (Building A and K) and their replacement with 3-storey duplex units and a 4-storey building consisting of 3-storey duplex units with apartments above (Buildings I, L, M and N). In order to ensure successful mediation between these lower buildings and Building J, the height of Building J was reduced by one storey. An additional floor was added to Buildings C and F.
- 2.3.4 Cork City Council planners welcomed the proposed scheme on foot of the proposed revisions, including the reduced numbers and increased typology, and that the scheme has evolved in a very positive way. It was considered that the proposal has the potential to be a significant catalyst for the area, and a place where people will want to visit for the range of services including the primary care centre (subject to a separate planning application). The City Architect had commented that the scheme had very satisfactorily responded to the request for a revision to the southern end of the site.
- 2.3.5 The proposals now presented with this application are premised on this clear advice from Cork City Council.
- 2.3.6 It is our opinion that the revised proposal is fully integrated into the wider area in the context of it being a large brownfield site situated in a strategic location in a semi-industrial environment consisting of large-scale box retail parks, large distribution warehouses, car parks, semi derelict open spaces and arterial roads. While the proposed development is located in a suburban area of Cork city, its immediate surrounding environment is not currently residential, with the nearest houses being approximately 170m from the site. Therefore, the redevelopment of the site presents an opportunity for significant transformation of the immediate area for positive residential development, for which the proposed development will act as a catalyst, as envisaged in adopted Variation No. 6 to the Cork City Development Plan 2015-2021, which rezoned the proposed development site from Light Industry and Related Uses to Residential, Local Services and Institutional Uses.
- 2.3.7 The transition that occurs between the existing, surrounding established development and the proposed development consists of a stepping up of scale along the Kinsale Road from 2-storey retail to a 15-storey landmark building in two storey increments.
- 2.3.8 The transition in scale along the Tramore Road moves west to east from a large-scale major distribution warehouse, stepping up to a 7-storey Primary Care Centre (the subject of a separate planning application

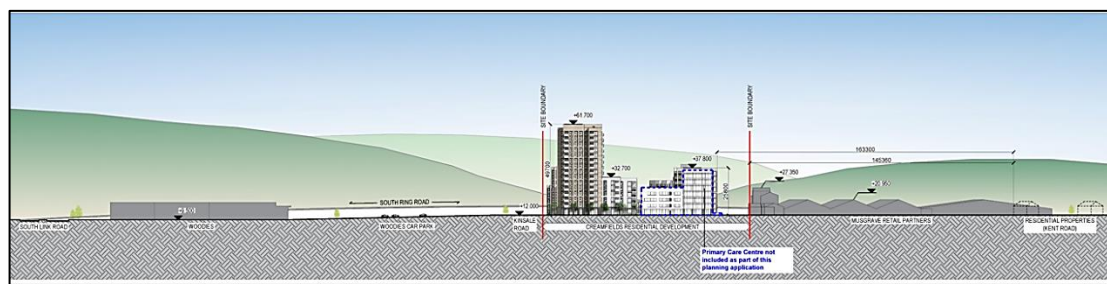


for the consideration of Cork City Council), and transitioning to the 15-storey landmark building at the junction between Tramore Road and Kinsale Road. It is noteworthy that while the subject site itself is not specifically designated for the development of a tall building in the Cork City Development Plan 2015-2021, as recorded in the pre-application consultation documents associated with this application, Cork City Council have indicated that they may consider a landmark building at the north-east corner of the subject site as appropriate, provided it is designed in such a way to stand out and be of particular architectural quality and that there is a diversity and hierarchy of height in the rest of the scheme.

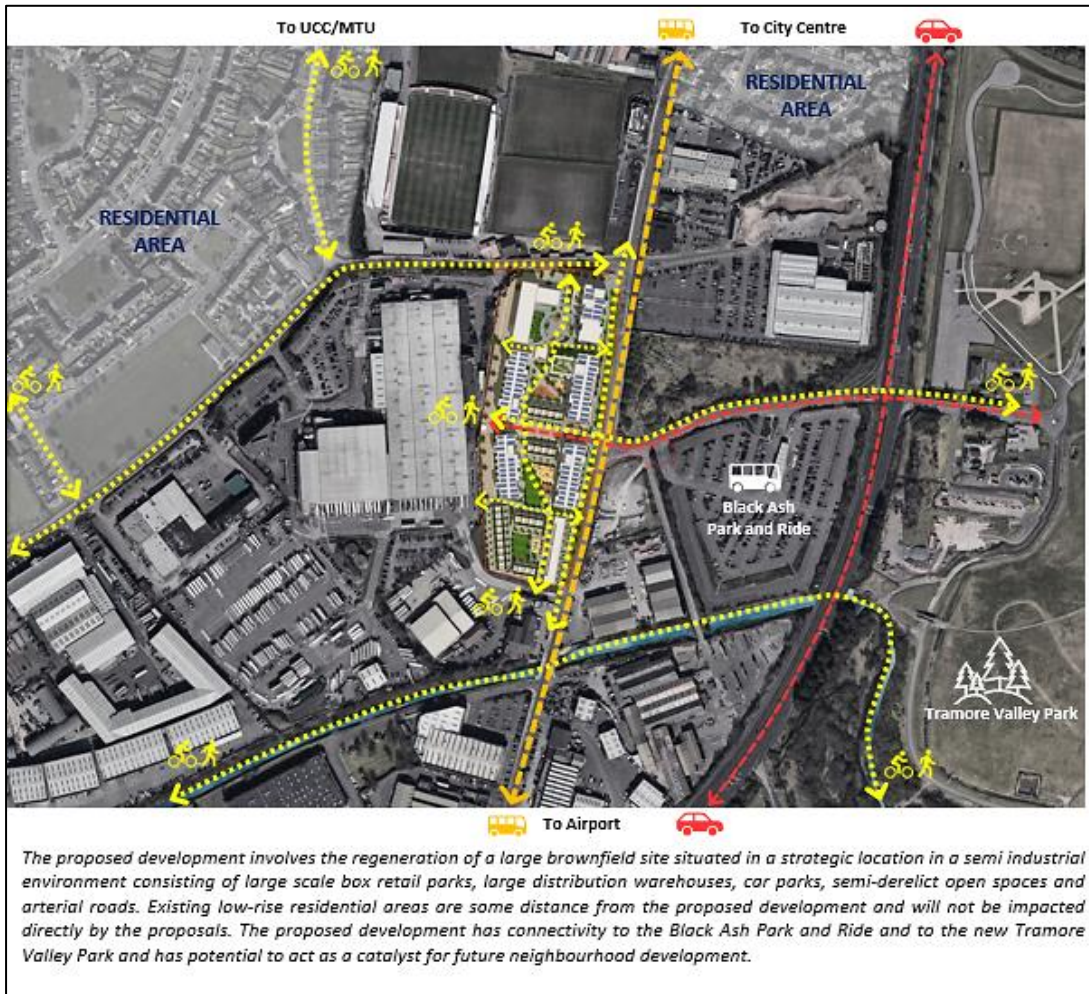
- 2.3.9 The revised proposed development is a high-quality design approach with dynamic and well-proportioned facades incorporating high quality materials, and with buildings arranged in urban streets and squares that maximise aspect and sense of enclosure. The proposal provides high quality community and place making spaces that transition from public squares surrounded by public facilities to quieter residential courtyards in a series of linked and legible character areas that incorporate Gorgon Cullen’s design principle of serial vision through the careful positioning of buildings.
- 2.3.10 In terms of the integration of this scheme with the wider area, consideration has been given to the potential for development on adjoining lands, with the proposed development site as the new town centre that will serve the wider area as it intensifies in line with national, regional and local planning policy in the future.
- 2.3.11 Permeability and connectivity form a key part of the urban design proposal for the proposed development. For further detail, please refer to the accompanying Architectural Design Statement prepared by Reddy Architecture and Urbanism.
- 2.3.12 Figures 2, 3, 4 and 5 below outline the permeability and connectivity of the site along with its surrounding context.



**Figure 2. Contiguous eastern elevation of proposed SHD in relation to surrounding context.**



**Figure 3. Contiguous northern elevation of proposed SHD in relation to surrounding context.**



**Figure 4. Indicative outline of connectivity and permeability the site of the proposed development can facilitate. (Credit: Reddy Architecture and Urbanism, 2022).**

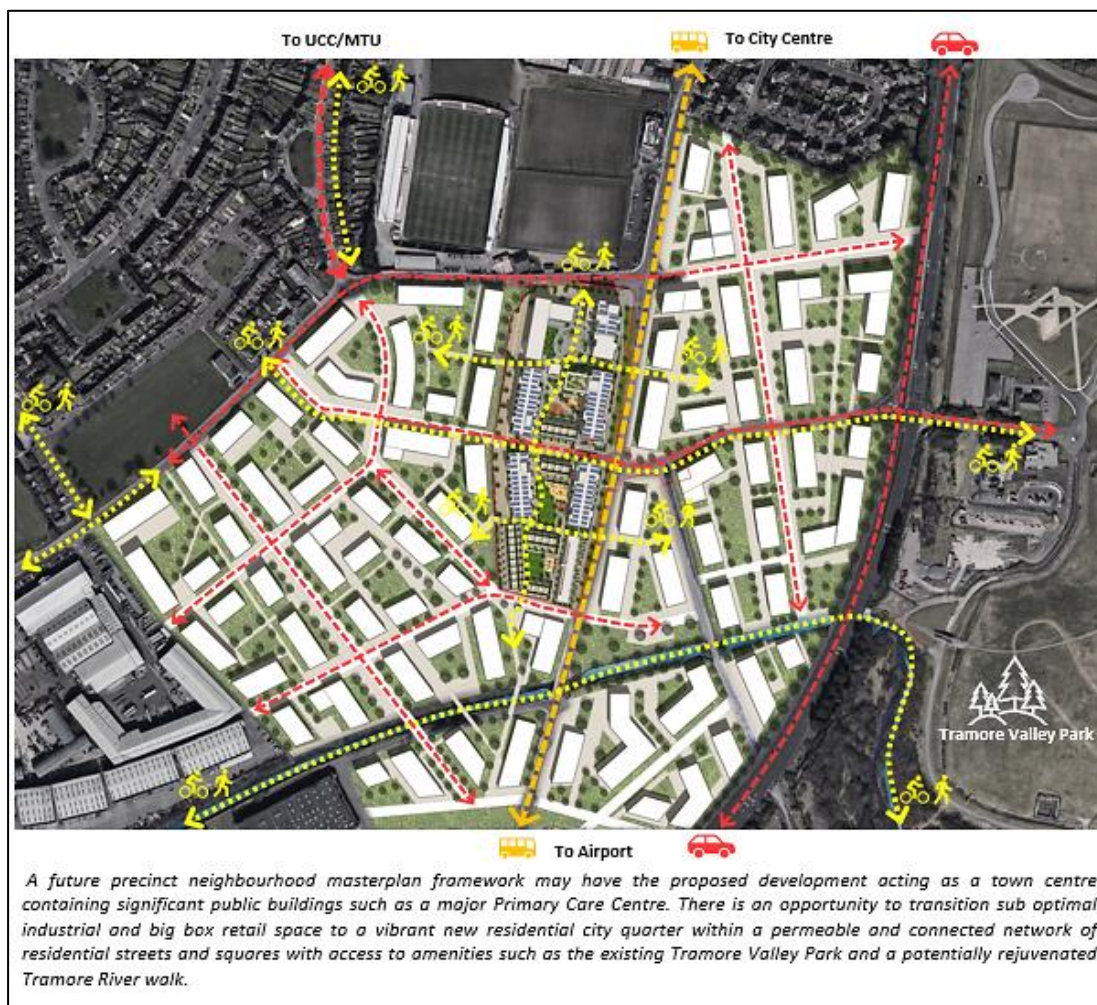


Figure 5. Relationship of *proposed development* site with potential future schemes. (Credit: Reddy Architecture and Urbanism, 2022).

### Further Response Items

#### 2.4 Item No. 1 – An updated Architectural Design Statement

*The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The statement should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries. The statement should be supported by contextual plans and contiguous elevations and sections.*

- 2.4.1 Reddy Architecture and Urbanism has prepared an updated Architectural Design Statement pertaining to the proposed development.
- 2.4.2 The revised Architectural Design Statement addresses guidance provided by Cork City Council, and addresses in detail the items of interest outlined in the Design Statement as follows:

**Urban Design Considerations:**

- *This site is a large brownfield site in a suburban semi industrial location with access to existing and future public transport with connectivity to the city centre and airport. It has the potential to provide a new Town Square for the community and also to be catalyst for future development in the immediate locality.*
- *It would be a gateway development that would provide an innovative, compact, connected, accessible, permeable, high density, high quality, residential development characterised by its own sense of place.*
- *In terms of this Architectural Report the Urban Design considerations are considered in detail in the following chapters : Vision and Executive Summary (page 7) , Site Context (page 11) Precinct Masterplan Context (page 17) which covers the Town Square context , location of the proposed Primary Care Centre (subject to a separate planning application) and the Creamfields site being part of a larger community based regeneration with the concept of the Kinsale Road boulevard. Please also refer to the Town Planning Rationale (page 25) which references how the proposal meets with the 15 minute city objective and outlines the urban design reasons for the proposed development , and how the development meets with the objectives of the variation no.6 to the Cork City Development Plan. Please also refer to the Chapter on Urban Design and the Tall Building rationale (page 31) which sets out the reasons for supporting the landmark building proposal.*

**Visual Impacts**

- *Due the scale of the development the visual impacts in the immediate vicinity will be significant but also positive. This is a landmark gateway residential development in a semi industrial suburban location on major arterial routes and so the development will be highly visible to many people, both living in the area and passing through. There has been a great deal of consideration given to the visual appearance of the buildings , in particular , along the Kinsale Road as this elevation makes a significant contribution to the outward appearance of the development. So, as a result of further dialogue with Cork City Council the visual impact along the Kinsale Road was modified to provide a stepped profile from lower scale developments in the area culminating in the tall landmark building –please refer to the response to Cork City Council comments chapter (page 43)*
- *In terms of overall visual impact please refer to the 3D views chapter (page 115) which demonstrate the high quality architecture expression of the proposed scheme which uses high quality face brick to all external viewpoints.*
- *This application is also accompanied with an Environmental Impact Assessment which includes a Townscape and Visual Chapter (Chapter 12) based on a Landscape Visual Impact Assessment prepared by Arup. The LVIA sets out a variety of viewpoints of the development and it is considered to be generally significant and beneficial in visual terms in so far as it will have a positive effect on the locality by the introduction of a clearly defined function and a sense of place for the emerging area.*
- *Overall, we believe that visual impacts of the proposed development are not only positive but beneficial in the proposed residential development will see a step change in the character of the Tramore Road area as envisaged in the adopted planning policy*

### **Site Context and Locational attributes of the area**

- *The site is a large flat brownfield site with a busy arterial road on the eastern and northern boundaries, with a large supermarket distribution centre and ancillary access roads on the western and southern boundaries. There are no buildings on the site or any significant landscape features.*
- *The surrounding area is characterised by open brownfield sites, large industrial buildings, large surface carparks, sports fields, retail parks.*
- *While it is in a suburban area there is no housing nearby with the nearest residences being hundreds of metres away. The site however is well located in terms of access to public transport and proximity to the newly created Tramore Valley Park. For further detail please refer to the Site Context Chapter in this Design Statement (page 11)*

### **Linkages through the site and Pedestrian Connections**

- *This proposal offers the opportunity to provide an attractive landscaped active edge to for the cycle lane by the provision of a tree lined avenue along the route.*
- *The site itself is arranged in a series of streets, squares and courtyards that provide permeable access routes through the scheme in particular for current and potential connectivity.*
- *Please refer to the Connectivity Chapter (page 53) the Precinct Masterplan context (page 17) and the Character Areas chapter (page 57)*

### **National and Local Planning Policy**

- *In terms of National Policy this development proposal helps Cork meet the policy objectives of the NPF 2040 including a target additional population of 125,000 people and the promotion of regeneration opportunities. The Cork MASP specifically identifies Tramore Road as being an "Example Regeneration Area" within Cork city.*
- *It is demonstrable that the proposed development meets with national and local planning policy in terms of height and density and the heights of 1 to 15 storeys and a density of 180 units/ha is consistent with heights and densities granted and proposed for similar large brownfield sites in Cork city.*
- *A High density development in this locality supports BusConnects and the objectives of CMATS and it provides a sustainable new suburban Cork city neighbourhood hub with employment, healthcare, education and leisure requirements for modern living within easy walking, cycling and/or public transport access.*
- *Overall, the development meets with the objectives of the NPF in the provision of sustainable mobility, compact growth, access to quality services, enhanced amenity and a transition to a low carbon and climate resilient society. Please refer to the Town Planning Rationale Chapter (page 25) in this Design Statement and the Planning Report prepared by Coakley O'Neill Town Planning Consultants for further detail.*

### **Finishes of the Blocks**

- *The primary finish for the buildings is face brick, in particular to the externally visible facades along street frontages. Brick is a high quality durable material that is very appropriate for a large-scale residential development such as this as it is a very versatile material with many options in terms*

of colour and detail. Plaster is also used, but as a minority material and is used only in internal courtyard locations due to its potential for colour and high reflectivity interacting with the landscape. Please refer to the Materials and Elevations chapter (Page 103) which outlines the material finishes, balcony expressions, articulation, proportions, and detailed and contiguous elevation studies of the proposals.

#### **Design relationship between the individual blocks within the site**

- The individual blocks are arranged within the site on the basis of a series of character areas that create a public realm of town squares, residential courtyards and parkland settings. The buildings form a sense of enclosure around external spaces providing passive overlooking while maintaining privacy.
- The larger apartment buildings are mostly orientated North South to maximise distance between them with smaller duplex buildings orientated East West between them to enclose space while maximising southern aspect to the courtyards.
- The proposals have been designed to maximise distance between the buildings to be more than 22 metre separation distance. When a separating distance of 22 metre is not possible angled windows are used to avoid views into adjacent apartments which also enable these apartments to be Dual Aspect. Please refer to Character Areas Chapter (page 57) and the Dual Aspect, Daylight and Privacy Chapter (page 91) of this Design Report for further detail.

#### **Relationship with adjoining development Interface along the site boundaries**

- The site is a key high-profile site with the potential to act as a gateway to the Tramore Valley at the junction of two major arterial routes adjacent the city's only public park and ride facility.
- As noted in the site context chapters the development is surrounded on the North and East by Tramore Road and Kinsale Road respectively and to the South and West by a large-scale warehouse distribution centre and its access roads.
- The development is set back from the Northern and Eastern boundaries in order to provide a public plaza and pedestrian, cycling landscape linear park zone along the Kinsale Road. The buildings are set back along the western boundary providing a surface parking and landscape buffer zone to the large-scale distribution warehouse.
- Please refer to Character Areas Chapter (page 57) and the Dual Aspect, Daylight and Privacy Chapter (page 91) of this Design Report for further detail.
- The layout and design is predicated the potential for future pedestrian and vehicular connectivity to the its western boundary.
- Please also refer to the Site Context (page 11), Precinct Masterplan Context (page 17) and the Connectivity (page 53) chapters of this Architectural Design Statement for further detail.

## **2.5 Item No. 2 – Statement of Material Contravention**

A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory plan for the area other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000

2.5.1 A Statement of Material Contravention has been prepared by Coakley O'Neill Town Planning Ltd and is included as part of this planning application.

2.5.2 The key arguments of that statement are:

- the proposed development is of strategic importance, as it will contribute to an increased supply of residential accommodation in the context of a chronic housing shortage and thus support national and regional policy objectives to deliver more homes within the existing footprint of cities and in cities other than Dublin to achieve regional parity in the country.
- there are conflicting objectives or objectives not clearly stated in the development plan, insofar as they apply to the preferred locations for tall buildings in Cork,
- permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, and
- permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan, including recent decisions of An Bord Pleanála.

2.5.3 In this context, it is our submission that the Board can grant planning permission for the proposed development in accordance with Section 9(6)(c) of the Planning and Development (Housing) and Residential Tenancies Act, 2016 (as amended), and Section 37(2)(b) of the Planning and Development Act, 2000 (as amended).

## 2.6 Item No. 3 – Housing Quality Assessment

*This provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.*

2.6.1 Reddy Architecture and Urbanism have prepared a Housing Quality Assessment which is included as part of this planning application.

2.6.2 The Housing Quality Assessment demonstrates that the proposed development meets and exceeds the minimum standards as set out in the 2020 Guidelines on Design Standards for New Apartments.

2.6.3 As requested, Reddy Architecture and Urbanism have denoted which of the units are considered by Watfore Limited as dual/ single aspect, single aspect north facing, and which units exceed the floor area by 10% by the use of colour dots, as illustrated below. Arrows have also been used to demonstrate direction of view for further clarity regarding those units deemed to be dual aspect.

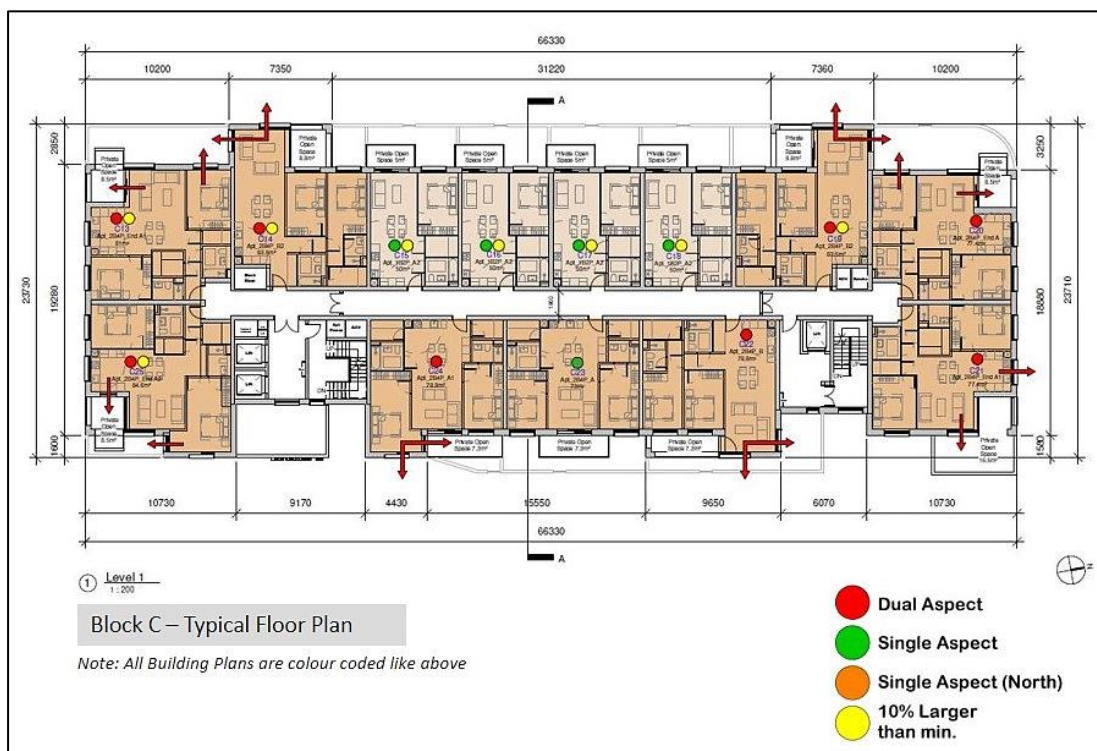


Figure 6. Dual aspect apartment breakdown of part of the proposed development. (Credit: Reddy Architecture and Urbanism, 2022).

## 2.7 Item No. 4

### *A Traffic and Transportation Impact Assessment*

2.7.1 A Traffic and Transportation Assessment and Mobility Management Plan Statement has been prepared by Arup Consulting Engineers and is included as part of the planning application documents.

2.7.2 The Traffic and Transportation Assessment and Mobility Management Plan finds that the proposed development:

- Complies with the Design Manual for Urban Roads and Streets (2019);
- Is in support of the objectives of the Cork Metropolitan Area Transport Strategy 2040 (2020);
- Resonates with the transportation and planning policy principle of investing in sustainable transport infrastructure;
- Will have a positive impact on the surrounding land uses and businesses;
- Is well-located regarding existing and planned active and public modes of transport;



- Will provide an increased population which will encourage delivery of planned walking and cycling infrastructure in the area;
- Will promote the use of the currently underutilised Black Ash Park and Ride bus service;
- Will promote the use of five other bus routes within a 15-minute walking distance which currently have capacity for additional passengers;
- Is permeable and provides for limited car parking, which makes for a quiet and safe residential environment;
- Will accommodate a BusConnects bus lane, a 3m wide footpath and a 2m wide cycle lane along the eastern site boundary with Kinsale Road;
- Will result in a low level of trip generation for which the local road network has capacity to accommodate;
- Includes provision for the appointment of a mobility manager to support future residents, staff and visitors to the proposed development.

## 2.8 Item No. 5

*Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.*

- 2.8.1 Cunnane Stratton Reynolds Land Planning and Design have prepared a Green Infrastructure and Amenity Plan, a Landscape Masterplan, and a Landscape Design Rationale report which correspond with the engineering plans and particulars prepared by Arup and the Tree Location Drawings and Arboricultural Tree Survey Report prepared by Tree Management Services, copies of all of which accompany this planning application.
- 2.8.2 Cunnane Stratton Reynolds have also prepared a response in respect of the above item, which is contained in the Landscape Design Rationale report. Their response to Item No. 5 of the opinion is outlined below:

### **TREE SURVEY REPORT**

*A significant part of the existing brownfield CMP Dairy site is concreted over with what remains of circulation yards and buildings, reduced to ground floor level, and is surrounded by a boundary screen of predominantly low value trees/hedging as well as self-seeded willow scrub to interior parts of the site. Refer to 'Existing Site Boundaries & Vegetation' (Pg 9 of this report) in conjunction with the specialist arborist report prepared by Tree Management Services (TMS) Arboricultural Tree Survey Report and Reference Plan TMS-CSR.01.21.21A for further information.*

### **PROPOSED TREE PLANTING STRATEGY**

*The proposed development, to deliver an interactive and permeable urban edge to the street along the eastern, northern and southern boundaries requires the removal of the existing industrial security fencing and associated vegetation. The development footprint along the western boundary also requires the removal of existing trees along that edge.*

To mitigate the loss of existing site vegetation, the proposed development includes a comprehensive tree and shrub planting strategy aimed at greening the site to enhance the biodiversity potential of the site in line with the All-Ireland Pollinator Plan using a range native and high-value non-native species throughout the development. For further information refer to Landscape Masterplan drawing no. 20400-2-101 and the following pages of this report:

- Landscape Masterplan & Character Areas, Pg 14-18
- Biodiversity and Sustainability, Pg 21
- Pollinator Planting Palette, Pg 22
- Green Infrastructure Strategy, Pg 27

Landscape Masterplan drawing no. 20400-2-101 has evolved in coordination with the project Engineering and Architecture Plans.

Tree planting proposals have the following key functions:-

- The provision of a long-term landscape framework which will soften the built environment.
- Provision of screening along site boundaries • Spatial definition across public open spaces and streets.
- The provision of seasonal variation and interest through the site including along pedestrian/cyclist routes. Promotion of the biodiversity potential of the site.

Planting beds throughout the scheme will also be adapted as rain gardens to form part of the Sustainable Urban Drainage Strategy (SuDS) for the proposed development.

## 2.9 Item No. 6

Justification of quantum and quality of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standards, provision of play spaces, hard and soft landscaping and planting details.

2.9.1 Cunnane Stratton Reynolds Land have prepared a response in respect of the above item, which is contained in the Landscape Design Rationale report, copies of which accompany this planning application. Their response to same is outlined below:

Public open space requirements for residential developments are outlined in table 16.2 extracted from the current Cork City Development Plan 2015 (as is also the case in table 11.11 of the draft Cork City Development Plan 2022-2028) as follows:

Area:	Public Open Space:
Greenfield sites/areas for which a local area plan is appropriate	15%
General Provision	10%

*Public open space in all types of residential development should:*

- *Be visually as well as functionally accessible to the maximum number of dwellings within the residential area;*
- *Be adequately overlooked by residential units;*
- *Integrate natural features (for example natural contours, outcrops of rock), where appropriate, as part of the open space;*
- *Be viable spaces, linked together where possible, designed as an integral part of the overall layout and adjoining neighbouring communal open spaces;*
- *Not include narrow pedestrian walkways, which are not overlooked by house frontages;*
- *Create safe, convenient and accessible amenity areas for all sections of the community;*
- *Generally no rear boundaries should face onto public open space.*

*Compliance with Development Plan standards is integral to the design strategy for the site with emphasis on 'Place-Making', the delivery of uplifting and safe environments with overlooked open spaces and streets, easily accessible and well connected outdoor spaces for all ages, sense of contact with nature and avoidance of potentially anti-social spaces. Public and semi-public open space is delivered at 23%.*

*In addition, the Dept. of Housing, Local Heritage Sustainable Urban Housing: Design Standards for New Apartments have been applied with the provision of one dedicated play space 300sq. m. in size and two dedicated play spaces each 100sq. m. in size, located adjacent to communal amenity/social spaces.*

*Refer to the following pages of this report for additional detail:*

- *Design Aims, Pg 12*
- *Design Rationale Statement, Pg 20*
- *Circulation & Permeability, Pg 25*
- *Recreation & Amenity, Pg 26-28*
- *Together with Landscape Masterplan drawing no. 20400-2-101.*

## **2.10 Item No. 7**

*A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:*

- (i) *Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.*
- (ii) *A Shadow Impact Assessment of the proposed development on the wider area.*

2.10.1 Arup Consulting Engineers have prepared a Daylight and Sunlight Analysis, copies of which accompany this planning application.

2.10.2 The Analysis makes the following observations:

- *The proposed development will have a negligible impact on the existing surrounding properties.*
- *All proposed amenity spaces will be greater than the BR 209 target for direct sunlight (SHOG).*
- *75% of the south facing windows tested meet or exceed the BR 209 recommended target of 25% for annual sunlight (PASH).*
- *87% of the south facing windows tested meet or exceed the BR 209 recommended target of 5% for winter sunlight (PWSH).*
- *When combined kitchen and living rooms are benchmarked against 1.5% ADF, 87% of the rooms tested within the development meet the relevant BR 209 / BS 8206-2 targets.*
- *When combined kitchen and living rooms are benchmarked against 2.0% ADF, 85% of the rooms tested within the development meet the relevant BR 209 / BS 8206-2 targets.*
- *87% of the rooms tested meet the Room Limiting Depth (RLD) requirement.*

2.10.3 It is noted in the report that, in order to mitigate against lower levels of skylight at the lower levels or at buildings corners, the height and building shape have been carefully revised during the planning process to avoid major obstructions and self-shading of buildings. In addition, the glazing area, and in particular the window width, have been specifically sized to maximise the number of units across the scheme that meet the BS8206-2 recommendations for ADF. The proposed development delivers ample access to sunlight in amenity spaces and good access to direct sunlight at unit windows.

2.10.4 In addition, and noting the advice of the Apartment Guidelines, which states that *where all requirements of the daylight provisions cannot be fully met, a rationale for any alternative, compensatory design solution(s) must be set out*, it is considered that:

- (a) The proposed development provides 23% public space at ground level, including landscaped, interconnected semi-public open spaces in the form of meadow parks and a garden court, as well as two no. rooftop gardens, and a public town square plaza, as well as upgraded public realm along Kinsale Road and Tramore Road and at the junction between Kinsale Road and Mick Barry Road. All units will benefit from views of these open spaces.
- (b) Pop out living rooms and balconies have been employed, to ensure that a significant majority of the proposed dwellings achieve dual aspect, in excess of the 50% requirement for suburban areas of the Apartment Guidelines
- (c) 61% of the non BTR dwellings are 10% larger than the minimum areas set out in the Apartment Guidelines. In addition, 26.5% of the BTR dwellings (Buildings E and F) are larger than 10% of the minimum standard, even though these dwellings are exempt from the 10% requirement.

2.10.5 In summary, the proposed development can be said to:

- *Have an overall negligible impact on the levels of daylight and sunlight availability in the surrounding existing properties and amenity spaces.*
- *Produce an environment that allows for plentiful sunlight penetration into all created amenity spaces and the majority of south facing apartment windows, in addition to producing appropriate levels of ADF within the apartments themselves.*

## 2.11 Item No. 8

*A response to matters raised within the PA Opinion submitted to ABP on the 14th of September 2021 in particular, section 2.9 'Building a community', in relation to quantum of resident services and amenities.*

2.11.1 With regard to the Planning Authority's Opinion submitted to the Board on 14<sup>th</sup> September 2021, and the above referenced item, the following is submitted.

2.11.2 The majority of the matters raised in section 2 of the Planning Authority's Opinion to the Board are addressed above in the preceding sections of this report, with the detailed responses included in the plans and particulars which accompany this planning application. Specifically, please refer to the:

- Architectural Design Statement, Housing Quality Assessment and all drawings prepared by Reddy Architecture and Urbanism,
- Traffic Transportation Assessment and Mobility Management Plan, Construction and Environmental Management Plan, Site Infrastructure Plan, Daylight and Sunlight Analysis and all other reports and drawings prepared by Arup Consulting Engineers,
- Environmental Impact Assessment Report prepared by Arup Consulting Engineers,
- AA Screening and Natura Impact Assessment prepared by DixonBrosnan,
- Landscape Design Rationale report, the Landscape Masterplan, and the Green Infrastructure and Amenity Plan prepared by Cunnane Stratton Reynolds,
- Planning Report and Statement of Consistency, Statement of Material Contravention, Childcare Needs Assessment, Social and Community Audit, and Statement of Housing Mix prepared by Coakley O'Neill Town Planning Ltd,
- Planning Support Report prepared by Savills, and
- Build-to-Rent Covenant prepared by Watfore Limited.

2.11.3 With regard to section 2.9 'Building a community' in particular and the quantum of resident services and amenities proposed, the following is submitted.

2.11.4 As detailed in the Social and Community Audit which accompanies this planning application, the site of the proposed development is well-located in terms of existing and planned social and community infrastructure, with the exception of pre-school childcare facilities. Accordingly, the proposed development includes the provision of a creche that can cater for up to 63 no. children.

2.11.5 In addition, the proposed development involves the provision of the following uses in the northern portion of the site:

- Retail, Café and Gym
- Community Hub facility
- Creche
- Coffee Kiosk

The northern part of the site is considered the most appropriate location for these facilities as the overall design strategy has been to concentrate the higher levels of intense public activity around the new town square, which is flanked by the focal point of the landmark tall building and the anticipated Primary Care Centre (subject to a separate planning application for the consideration of Cork City Council). Therefore, the highest levels of visitors to the site and interactions between residents will occur north of the proposed new central street, which aligns with the junction of Kinsale Road and Mick Barry Road.

- 2.11.6 The southern portion of the site has been redesigned since the Planning Authority submitted their Opinion to the Board, with the Planning Authority welcoming the revision. The revision involves a reduction in height at this location and the provision of 59 no. dwellings in 4 no. buildings (I, L, M and N) ranging in height from 3-4 storeys. Of these 59 no. dwellings, 50 no. have own door access at ground level, while 9 no. deck access apartments in Building N have been specifically designed for elderly residents. Of note is that Buildings B, C, E, F, J and N also have lift access to the apartments for less able-bodied persons.
- 2.11.7 In addition, the Garden Court and both Meadow Parks have designated areas for play for younger and older children, as well as communal outdoor spaces for all ages to meet and interact. Outdoor seating has also been incorporated into the landscaping proposals for the internal open spaces in the proposed development.
- 2.11.8 The site layout and design strategy result in high quality community and place making spaces that transition from public squares surrounded by public facilities in the north to quieter residential courtyards in the south.
- 2.11.9 The proposed development includes 5 no. clearly defined pedestrian access points from Kinsale Road and Tramore Road, with pedestrian access also possible along the southern site boundary.
- 2.11.10 With regard to the provision of schools in the local area, the provision of primary and post-primary school facilities in Ireland is determined on an area specific basis by the Department of Education, having regard to available school capacity, demographic projections, analysis of child benefit records, and local GIS travel pattern modelling.
- 2.11.11 According to the *Draft Cork City Development Plan 2022-2028*, the Department of Education has prepared preliminary projections of requirements for school places in Cork City up to 2031, and the projections suggest a potential need of up to 19 new or expanded primary schools and up to 7 new or expanded post-primary schools. This preliminary assessment suggests that between 6-9 new or expanded primary schools and 2 new or expanded post-primary schools are envisaged as being required in the immediate vicinity of the catchment area<sup>1</sup> of the proposed development over the next decade.

---

<sup>1</sup> As defined in the Social and Community Audit which accompanies this planning application.

- 2.11.12 The Department of Education were contacted by Coakley O'Neill Town Planning on several occasions regarding the provision of new schools in the catchment area of the proposed development site. However, at the time of writing, no response has been received from the Department.
- 2.11.13 In their submission to the *Draft Cork City Development Plan 2022-2028*<sup>2</sup>, the Department sets out that there are currently 13 no. mainstream primary schools and 4 no. post-primary schools in the South-West Suburbs of Cork City, the area where the site of the proposed development is located. At both primary and post-primary levels, the Department anticipates that the expansion of existing schools rather than the establishment of new schools should meet the projected requirements for the South-West Suburbs of Cork City.
- 2.11.14 The Department's submission also notes that a new school was announced in 2018 to meet the need for a school in the South-West Suburbs. South Lee Educate Together National School opened in 2019 and is currently in interim accommodation. In their submission, the Department requested that Cork City Council consider including in the new City Development Plan a suitable land use zoning objective that would support the development of a new 16-classroom primary school in respect of serviced lands in the Pouladuff/Lehanagh Mór area.
- 2.11.15 Based on the above, it is our opinion that it is reasonable to expect that the schooling needs of the future residents of the proposed development can be met locally.

## 2.12 Item No. 9

*As per SPPR7 of the Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020 the development must be described in the public notices associated with a planning application specifically as 'Build to Rent' housing development and a covenant/legal agreement is required at application stage for BTR development.*

- 2.12.1 As per SPPR7 of the *Sustainable Urban housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2020*, both the site notice and newspaper notice for the proposed development include the following phrase:

*"All of the dwellings proposed in Buildings E and F (257no. dwellings) will consist of Build To Rent apartments,"*

- 2.12.2 In addition, the planning application for the proposed development is accompanied by a proposed Build-to-Rent covenant/legal agreement, prepared by Watfore Limited, further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such.

## 2.13 Item No. 10

---

<sup>2</sup> The closing date for submissions to the Draft Cork City Development Plan was 4<sup>th</sup> October 2021.

*A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.*

- 2.13.1 A Flood Risk Assessment and Site Infrastructure Report, both prepared by Arup Consulting Engineers, are included as part of this planning application.
- 2.13.2 Regarding surface water drainage and the proposed surface water management strategy, it is proposed to construct a new dedicated surface water system to serve the proposed development. The intention is to discharge surface water off site to the south to an existing surface water pipework located within Kinsale Road. This surface water pipe ultimately outfalls to the Tramore River nearby. A CCTV survey of this pipe was carried out (see Appendix F of the Arup's Site Infrastructure Report) which indicates a blockage along the existing pipework upstream of the outfall. From discussions with Cork City Council, it is understood that the existing gullies in the vicinity of the pipework may not be adequately connected to the existing pipework. As part of the proposed works the pipe blockage will be remedied and the existing gullies will be connected to the pipework.
- 2.13.3 The existing site is predominantly impermeable, and it is expected any existing positive drainage system on site is in a poor state of repair. The site falls from north to south and the section of site immediately inside the southern boundary appears to have ponding water. The proposed surface water strategy aims to greatly reduce the discharge rates by restricting run-off from site to a QBAR Greenfield Runoff rate of 3.17 ls/ha. Attenuation will be provided to cater for those instances where the runoff generated on site exceeds the restricted run-off rate. The surface water network has been modelled to assess potential attenuation volume requirements. Attenuation will be sized to cater for storms up to and including the 1 in 100-year event + 10% allowance for climate change.
- 2.13.5 Attenuation/SuDS measures will be provided as follows:
- 4no. below ground geocellular storage will be located beneath public realm areas/the undercroft car park.
  - Permeable paving will be provided to car parking areas. Runoff from adjacent sealed hardstanding areas will be directed to drain towards the permeable paving areas.
  - Soft landscaping/tree planters. Runoff from adjacent sealed hardstanding areas will be directed to drain towards soft landscaping areas.
  - 2 no. green roofs in the form of the rooftop gardens on Buildings E and F.
- 2.13.6 The Flood Risk Assessment also explains that the floor levels of the proposed buildings will be elevated above the surrounding ground levels and/or the surrounding ground levels will be profiled to promote flow of surface water away from the buildings in order to minimise the risk of surface water ingress in a design exceedance event.
- 2.13.7 Please refer to the Flood Risk Assessment, Site Infrastructure Report and, in particular, drawing no. 252666-ARUP-ZZ-XX-DR-C-1000 for further details.



## 2.14 Item No. 11

*Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission dated 20th September 2021.*

- 2.14.1 A Site Infrastructure Report has been prepared by Arup Consulting Engineers and is included as part of this planning application.
- 2.14.2 A pre-connection enquiry has been submitted to Irish Water and they have issued a Confirmation of Feasibility Letter (reference CDS20008019, dated the 25<sup>th</sup> of January 2021, included as an appendix in Arup's Site Infrastructure Report) confirming they have capacity within their network to serve the development without upgrade.
- 2.14.3 Regarding potable water supply, it is proposed to provide a new connection from the existing watermain located in Kinsale Road. A bulk water meter will be provided immediately downstream of the 2 No. connections to the existing Irish Water watermain. Downstream of the bulk water meter a series of ring mains will be provided on site from which each development building will be fed. The metering strategy for the development will be as follows:
- For supply to high rise buildings with multiple apartments a below ground meter will be provided outside the building to allow for metering of the entire building and a water meter room is allowed for within the building to allow for metering of individual units.
  - For supply to individual units (e.g. apartments with townhouse overhead as per Building L and retail/cafe units) a below ground meter will be provided outside the building.
- 2.14.4 External fire hydrants will be connected to the ring mains on site. The location/number of fire hydrants shall be confirmed during the fire certification stage.
- 2.14.5 Regarding foul water, it is proposed to construct a dedicated below ground foul network to collect and convey all foul water generated by the development. Foul water flows generated on site are expected to be as follows:

	Average Discharge	Peak Discharge (based on a peaking factor of 6)
<b>Building E</b>		
<b>Residential</b>	0.89 l/s	5.34 l/s
<b>Non-residential</b>	0.09 l/s	0.54 l/s
<b>Combined</b>	0.98 l/s	5.88 l/s
<b>Remainder of the proposed development</b>		
<b>Residential</b>	3.82 l/s	22.92 l/s
<b>Non-residential</b>	0.08 l/s	0.48 l/s
<b>Combined</b>	3.90 l/s	23.4 l/s

Table 1. Estimated foul water discharge rates.

- 2.14.6 There is an existing 600mm diameter combined sewer crossing the site from west to east. It is proposed to divert this sewer in order to accommodate the proposed building/site layout.
- 2.14.7 It is proposed to discharge all foul water from Building E via gravity to the diverted combined sewer. The remaining buildings to the south cannot discharge to the combined sewer via gravity due to the topography of the site. As a result, it is proposed to discharge foul runoff from the majority of the site to a new centrally located Pumping Station (PS). A rising main from the PS will discharge to the combined sewer.
- 2.14.8 It is intended the PS will be taken in charge by Irish Water. As the PS will be located adjacent to public amenity areas the design coordinates the PS with the surrounding landscaping to reduce any potential impact on residential amenity. Please refer to the Site Infrastructure Report prepared by Arup Consulting Engineers for further details.
- 2.14.9 For clarification regarding surface water drainage, please refer to section 2.13 above.

## 2.15 Item No. 12

*A response to issues raised in the Drainage Planning Report, and the Transportation Planning report undated, accompanying the PA Opinion submitted on the 14th September 2021.*

- 2.15.1 Regarding a response to the Drainage Planning Report accompanying the Planning Authority's Opinion submitted on the 14<sup>th</sup> September 2021, please refer to sections 2.13 and 2.14 above and to the Site Infrastructure Report and associated drawings prepared by Arup Consulting Engineers.
- 2.15.2 Regarding a response to the Transportation Planning Report accompanying the above Planning Authority's Opinion, please refer to sections 2.2 and 2.7 of this statement and to the accompanying Traffic and Transportation Assessment and Mobility Management Plan prepared by Arup Consulting Engineers.

## 2.16 Item No. 13

*An AA screening report, which inter alia, considers potential impacts on all of the Qualifying interests (QI's) of all Natura 2000 sites identified as being within the zone of interest.*

- 2.16.1 An AA screening report and subsequent Natura Impact Statement (NIS) has been prepared by Dixon Brosnan and is included with this planning application. The AA Screening and NIS report reaches the following conclusion:

*The AA screening concluded, on the basis of objective information and in view of best scientific knowledge, the possibility of significant effects from the proposed project on European sites could not be ruled out and therefore an Appropriate Assessment was required. The AA screening*

*concluded that there was potential for the proposed development to significantly impact the Cork Harbour SPA, via surface water runoff and the spread of invasive species during construction as well as potential in-combination impacts.*

*This NIS has examined and analysed, in light of the best scientific knowledge, with respect to Cork Harbour SPA within the potential zone of influence of the proposed development, the potential effect pathways, how these could impact on SCI species and habitats and whether the predicted effects would adversely affect the integrity of Cork Harbour SPA.*

*It has been objectively concluded following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted effects from the proposed development and with the implementation of the mitigation measures proposed, that the construction and operation of the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. There is no reasonable scientific doubt in relation to this conclusion. The competent authority will make the final determination in this regard*

#### **2.17 Item No. 14**

*A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.*

- 2.17.1 Drawing no. P19-195C-RAU-00-XX-DR-A-24001 "Site Layout Plan to be Taken in Charge" has been prepared by Reddy Architecture and Urbanism, copies of which accompany this planning application. This drawing indicates that the public realm within Watfore Limited's ownership on the Kinsale Road and Tramore Road will be taken in charge by Cork City Council.
- 2.17.2 The proposed foul pumping station is subject to a confirmation of design acceptance on the part of Irish Water. Please refer to the Site Infrastructure Report and drawing no. 252666-ARUP-ZZ-XX-DR-C-2000, which state that the pumping station will be taken in charge by Irish Water, the exact details of which to be agreed at detailed design stage.

#### **2.18 Item No. 15**

*Site Specific Construction and Demolition Waste Management Plan*

- 2.18.1 A Construction and Demolition Resource and Waste Management Plan and a Construction Environmental Management Plan have been prepared in respect of the proposed development by Arup Consulting Engineers and copies of both are included with this planning application.
- 2.18.2 The Construction and Demolition Resource and Waste Management Plan states the following:

- *The footprint area of the existing hardstanding on site to be demolished/removed is approximately 18,308 m<sup>2</sup>. In accordance with Section 4.3.1.3 of the EPA Best Practice Guidelines for the Preparation of Resource Management Plans for Construction and Demolition Projects (EPA, 2021a) the proposed demolitions works will be carefully planned to ensure the reuse and recovery of deconstructed components is maximised where feasible, in compliance with regulatory and performance requirements.*
- *It is noted that there is likely to be asbestos present in soils on site. An asbestos audit will be therefore undertaken prior to any demolition and excavation works. Asbestos waste will be removed from site by specialist contractors and holders of the appropriate waste collection permit.*
- *Organic waste (such as trees and vegetation) will be removed from site by a waste collection permit holder and delivered to an authorised composting or organic waste facility. The extent of vegetation clearance will not be significant.*
- *It is estimated that approximately 45,920m<sup>3</sup> of excavated material will be generated from the proposed development. The vast majority of this material will be comprised of made ground and will be non-hazardous or inert. A small volume of material is predicted to be hazardous.*
- *Possibilities for the re-use of clean, non-hazardous or inert excavation material as fill or for engineering uses in the works will be considered following appropriate testing to ensure material is suitable for its proposed end use where required.*
- *Where clean, non-hazardous or inert excavation material may not be re-used within the proposed works the contractor will endeavour to send the material to authorised facilities for beneficial re-use, recovery or recycling so far as is reasonably practicable.*
- *Excavated material that is deemed hazardous will be treated at an authorised facility either in Ireland or abroad.*
- *A Soil Management Plan will be prepared for the proposed development to identify detailed reuse opportunities for excavated material on site.*

2.18.3 The Construction Environmental Management Plan sets out the phasing for the site as follows:

- **Site Enabling Works (2-4 months)**
- **Phase 1 Construction (circa. 2.5-3.5 years):**
  - o *Primary Care Centre Including Retail – Pharmacy (this is the subject of a separate planning application)*
  - o *Retail (Gym, Creche, and Café)*
  - o *Town Square*
  - o *Court Garden*
  - o *Coffee Kiosk*

- o Residential Blocks E & F*
- o New entrance from Kinsale Road*
- o Ancillary Site Development Works (Including underground services, pavement upgrade works, central avenue site works, surface car parking, landscape works, etc.)*

- **Phase 2 Construction (circa. 2-2.5 years):**

- o Residential Blocks G & C*
- o Ancillary Site Works*

- **Phase 3 Construction (circa. 2.5-3.5 years):**

- o Residential Blocks J, H, B*
- o Ancillary Site Development Works (Including underground services, pavement upgrade works, landscape works – Meadow 2 etc.)*

- **Phase 4 Construction (circa. 1.5-2.5 years):**

- o Residential Blocks I, L, M & N*

2.18.4 The Construction Environmental Management Plan outlines the measures, controls and procedures that will be followed during the construction of the proposed development. The Construction Environmental Management Plan is considered a 'live document' that will be reviewed and revised regularly as construction progresses.

2.18.5 Appendix A of the Construction Environmental Management Plan comprises a Construction Traffic Management Plan prepared by Arup. The Construction Traffic Management Plan will remain a live document that will be reviewed by the contractor and updated, where necessary, throughout the construction phase.

2.18.6 The Construction Traffic Management Plan provides details of intended construction practices for the development, including:

- Outlining the minimum road safety measures to be implemented at the site access/egress locations and at the approaches to such access/egress locations, during the works.
- Demonstrating to the contractor and suppliers the need to adhere to the relevant guidance documentation for such works.
- Providing the basis for the contractor to further develop the details of the Construction Traffic Management Plan.

2.18.7 Appendix B of the Construction Environmental Management Plan comprises an Invasive Species Management Plan prepared by DixonBrosnan. Japanese knotweed, buddleia and Himalayan honeysuckle are both present on site.

2.18.8 The Invasive Species Management Plan sets out the procedures to be followed with regard to addressing the presence of invasive species on site in terms of the construction of the proposed development, namely the carrying out a pre-construction survey, the adherence to site hygiene protocols at contaminated areas, and management of the Japanese Knotweed. The preferred treatment option is, in advance of construction, chemical treatment of the Japanese Knotweed material followed by continued chemical

treatment of regrowth. Other invasive species identified on site are straightforward to control using a mixture of mechanical removal and herbicide treatment.

## **2.19 Item No. 16**

### *Details of Public Lighting*

- 2.19.1 An outdoor lighting report has been prepared by EDC Mechanical & Electrical Consulting Engineers. This is included as part of the planning application. Drawing No. 16020-EDC-SHD-00-DR-PL-3000 highlights the Horizontal Illuminance (lux) of the proposed development.

## **3.0 CONCLUSION**

- 3.1 This document sets out a response by Watfore Limited and their design team to the matters outlined in the Board's opinion on a proposed strategic housing development at the former CMP Dairy Site, known as Creamfields.
- 3.2 It is respectfully submitted that all the issues raised in the Board's opinion and minutes have been substantially and comprehensively addressed in the application now before the Board.