Planning Statement

For Development at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork

on behalf of Barrys Field Ltd.,

January 2025



McCutcheon Halley

CHARTERED PLANNING CONSULTANTS

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1 Introduction

This planning report has been prepared on behalf of Barrys Field Ltd., to accompany a Large-scale Residential Development application (LRD) to Cork City Council consisting of the construction of 124 no. residential apartments (consisting of a mix of 1, 2 and 3 bed units), 1 no. cafe unit and 2 no. office units, in a development ranging in height from 1 to 5 storeys and all associated site development works including footpaths, car and bicycle parking, drainage, bicycle and bin stores, lighting, fencing, landscaping/amenity areas, ESB substation/switchroom and plant room. Site development works include 2 no. new uncontrolled pedestrian crossings and footpath improvements on Churchyard Lane which requires the removal of 6 no. existing on-street car parking spaces. The proposed development works include a connection and construction of a new storm water and foul sewer along Carrigaline Road. Access to the site will be via a new vehicle access point and a new pedestrian connection from Carrigaline Road and 2 new pedestrian connections onto Churchyard Lane. The new vehicular access requires the removal of 4 no. existing car parking spaces at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork.

A design team with extensive experience in residential applications has been appointed by the applicant including O'Mahony Pike Architects, McCutcheon Halley Planning Consultants, DOSA Engineers, MHL & Associates, Cunnane Stratton Reynolds Landscape Architects, Arup, John Cronin and Associates, Lane Purcell Archaeology and CLV Consulting to ensure a high-quality design, and a robust and comprehensive pre-application submission is made to Cork City Council.

2 Site Context and Development Description

2.1 Site Context

The proposed development site is located in the centre of Douglas. Church Yard Lane bounds the west and Carrigaline Road is located to the east of the site. The site is neighboured to the north by a mix of residential and commercial buildings and is a greenfield site, approximately 0.83ha (net area) in size. The site is bounded by existing trees and stone walls along the eastern and western edges of the site. Directly south of the site is a telecom exchange and St. Lukes Church, and graveyard are located to the southwest area of the site.

The site is within Douglas town centre, and the majority of amenities are easily accessible and in close proximity to the site. Douglas Village Shopping Centre is only a 3-minute walk from the site, while Douglas Court Shopping Centre is a 10-minute walk.

A number of bus stops are within a close proximity to the site, serving routes such as the 216 which travels from Mount Oval to Cork University Hospital

with services every 30 minutes, the 220 & the 220X bus routes travels from Cork City Centre to Ovens and Carrigaline with services every 15 minutes, and the 223 & 223X travels from Cork to Haulbowline, with services every 60 minutes. Other bus stop within a close proximity serves route 207 which travels from Donnybrook to Glenheights, with services every 30 minutes, 219 which travels from Bishopstown to Mahon Point, services every 60 minutes, and finally route 206, travelling from South Mall to Grange, with services every 15 minutes.

Douglas town centre is in close proximity to areas identified as *Strategic Employment Locations, Mixed Use Employment & Regional Assets* in the Cork City Council Development Plan 2022, such as Cork City Centre, Mahon, and Cork Airport all of which are within a 10 kilometre distance of Douglas.

As outlined below, the subject site is in close proximity to a range of amenities, easily reachable by walking, cycling or public transport.



Figure 1 Site location outlined in denoted by a red pin.

2.2 Proposed Development

The proposed development consists of the construction of 124 no. apartment units ranging in height from 1-5 storey apartments at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork. The proposed development has been arranged into two blocks which are setback from the existing boundaries which ensures the development respect the surrounding area, especially as it is within the Douglas Donnybrook Architectural Conservation Area (ACA), and preserves the existing stone walls, hedgerows and trees as much as possible.

The proposed apartment sizes range from one-bed (2 person) to three-bed apartments (5 person). The proposed ground floor apartments will have private open space by way of courtyards, while the upper units will consist of balconies. Following feedback from the Council from the pre-consultation

meetings, the design has been revised to provide for non-residential uses within the ground floor along Carrigaline Road which will comprise of offices and café uses and provide animation and active frontage along the street and the main pedestrian entrance of the site.

Car parking within the scheme will be provided by way of car parking areas located to the eastern portion of the site and will consist of 26 no. parking spaces. The number of car parking spaces proposed will serve to significantly reduce the sites traffic impact. There will be no front-of-door car-parking proposed as part of this development. Within the proposed 26 car spaces, 2 no. car club spaces are proposed at the entrance via Carrigaline Road which are located just outside of the proposed barrier area. This will allow site residents and local residents to use the car club vehicles.

A significant number of bicycle spaces have been provided – a total of 274 bicycle spaces (212 resident spaces and 62 visitor spaces) will be provided to encourage sustainable modes of travel.

The proposed development provides for good pedestrian connection to the town centre and the neighbouring amenities via east and west of the site. The proposed development will promote compact growth through linking with the existing public, private, and non-motorised transport infrastructure in the area.



Figure 2 Proposed site layout as prepared by OMP.

The design of the proposed scheme has been informed by the relevant national, county, and local planning policy documents:

- Sustainable Residential Development and Compact Settlements 2024;
- Urban Design Manual – A Best Practice Guide and the Design Manual for Urban Roads and Streets at a national level; and
- 2022-2028 Cork City Development Plan.

The table below demonstrates the key elements of the proposed development.

Site Area	1.04 Ha (all red line) 0.84 Ha (gross/net)
Number of Units	124 no. apartment units
Unit Mix	50 no. 1 bed (2 person) apartment (40.3%) 12 no. 2 bed (3 person) apartment (9.7%) 52 no. 2 bed (4 person) person apartment (41.9%) 10 no. 3 bed apartment (8.1%)
Density	153.7 Units/Ha
Communal Open Space	789.7m2 (9.4%)
Public Open Space	1444.9m^2 (17.2%)

A total of 15 no. photomontages have been prepared by Model Works, which outlines how the proposed building would be complimentary to the Carrigaline Road and would not detract from the character of the local area. The photomontages (which were agreed with Cork City Council) demonstrate views of the proposed development during the summer, and also in the winter months. Please refer to the submitted photomontage for further details.



Figure 3 Excerpts of the Photomontage by Model Works – View 7 – Proposed View.

3 Planning Policy

The following outlines the relevant planning policy context for the proposed development.

3.1 Sustainable Residential Development and Compact Settlements 2024

The Sustainable and Compact Settlement Guidelines 2024 were published on January 15th, 2024, and replaced the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009.

The guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements. The guidelines emphasize the renewal of existing settlements and the importance of well-designed, mixed-use neighbourhoods to reduce reliance on cars, improve access to services, and protect the environment. Planning authorities should aim for a '15 minute city' model where residents can access essential services within a short walk or cycle from home.

The subject site would be categorised as a 'City-Urban Neighbourhood', as it has it is near a planned high-capacity public transport node, with good access to employment, education, and institutional uses. This would suggest densities between 50 to 250 dwellings per hectare.

3.2 Sustainable Urban Housing: Design Standards for New Apartments 2022

The Guidelines for '*Sustainable Urban Housing: Design Standards for New Apartments*' issued by the Department of Housing, Planning and Local Government in 2022, provides guidance in relation to the provision of new apartments. The Guidelines state that Planning Authorities must prioritise the objective of more effective usage of existing underutilised sites.

The Guidelines note that Local Authorities determine suitable locations for the provision of apartments, having regard to a broad description of proximity and accessibility considerations. For locations within central and accessible urban areas, proposals of small to large-scale and higher density development, sites are deemed suitable whereby the following may apply:

- Sites within walking distance (up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third level institutions.
- Sites within reasonable walking distance (up to 10 minutes or 800-1,000m) to/from high-capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (up to 5 minutes or 400-500m) to/from high frequency (min 10-minute peak hour frequency) urban bus services.

Specific Planning Policy Requirement 3 (SPPR) requires the following minimum apartment floor areas:

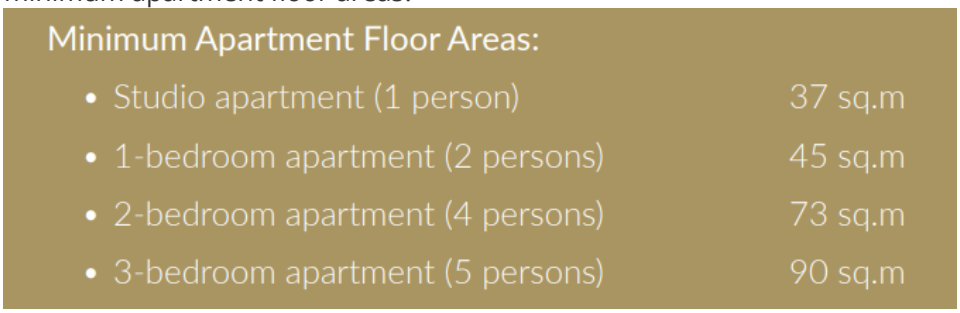

Figure 4: SPPR 3 – Apartment Floor Areas

3.3 Urban Development and Building Height Guidelines, 2018

The Urban Development and Building Heights Guidelines (UDBHG) supports increased building height and density in city locations with good public transport accessibility. It emphasises that the NPF requires increased density, scale and height of development in urban core areas but also recognises that more focus is required on reusing previously developed brownfield land and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage.

The UDBHG requires Local Authorities to be more proactive and flexible in securing urban growth through increased densities and buildings heights. The proposed development is considered to respond to the overall natural and building environment which will add to the architecturally aesthetic of Douglas.

Section 1.4 explains that:

> *"in recent years, local authorities, through their statutory development and local area plan processes, have begun to set generic maximum height limits across their functional areas. Frequently, such limits have resulted from local-level concerns, like maintaining the character of an existing built-up area, for example. However, such limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby many of our cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area. Such blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes"*

3.4 Cork City Development Plan 2022

The Cork City Development Plan (CCDP) 2022 establishes a network of areas in the City, ranging from the City Centre, City Fringe, Inner Suburbs and Outer Suburbs. Each area comes with recommended densities, building heights and best practise in terms of sustainable development. Douglas is noted to be one of the discernible areas and is described as *"a larger suburb with a village character served by two large shopping centres and good public transport links to the city."*

The Cork City Council Development Plan has identified Douglas as an Inner Urban Suburb (refer to image below) and having prevailing building heights of 2 to 3 storeys and densities ranging from 5 to 20 units per hectare. It is noted that these ranges have been increased in the Cork City Council Development Plan 2022 and it is envisions Douglas to be an area with a density band of 50 dph on the lower end and 100 dph on the higher end. The building height band ranges from 1 storey on the lower end to 5 storeys on the higher end.

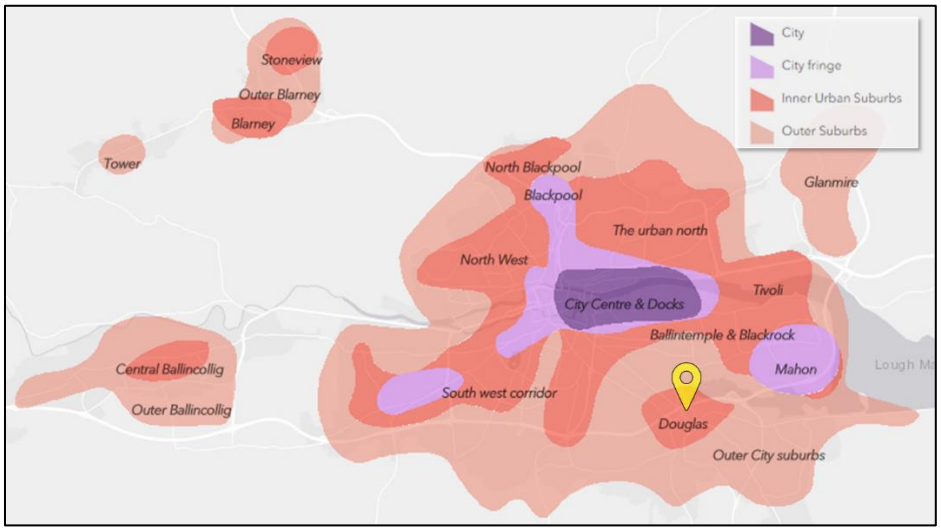

Figure 5 Cork City Council Building Density & Heights Map. Site denotated by a yellow pin.

Density and Building Heights Strategy	Density					Heights			
	FAR		Dwellings Per Hectare			No. of Storeys			
	Prevailing	Target	Prevailing	Target*		Prevailing		Target	
				Lower	Upper	Lower	Upper	Lower	Upper
City	**2.5 - 7**	**4+**	**10 - 25**	**100**	**N/A**	**2**	**5**	**4**	**8****
City Centre	2.5 - 7	4+	10 - 25	100	N/A	2	5	4	6
North Docks	0.5 - 1	3+	0 - 40	100	N/A	2	3	4	7
South Docks	0.5 - 1.5	4+	0 - 10	100	N/A	2	4	5	10**
Fringe / Corridor / Centre	**1.0 - 3.5**	**2.5 - 4+**	**25 - 100+**	**50**	**150**	**2**	**6**	**4**	**7**
City Fringe / Corridor	1.5 - 3.5	2.5 - 4.5	25 - 100	50	150	3	6	5	7
Mahon	0.5 - 3.5	1 - 4	10 - 40	50	120	2	5	4	6
Blackpool	0.5 - 3.0	1 - 4	0 - 40	50	120	2	5	4	6
Wilton	0.5 - 3.5	1 - 4	10 - 25	50	120	2	4	3	5
Inner Urban Suburbs	**0.2 - 1.5**	**0.5 - 2.5**	**10 - 40**	**45**	**100**	**2**	**4**	**3**	**5**
1. The Urban North	0.2 - 0.7	0.5 - 1.5	10 - 25	50	100	2	3	3	4
2. Tivoli	0.2 - 0.7	0.5 - 3.5	0 - 10	50	100	2	4	3	5
3. Ballintemple & Blackrock	0.2 - 1.5	0.5 - 1.5	10 - 25	40	80	2	4	3	5
4. Douglas	0.2 - 2.5	0.5 - 3.5	5 - 20	50	100	2	3	3	4

Figure 6 Cork City Council Building Density & Height Table (extract CCDP)

The role of a City Suburb in the Core Strategy is the following:

> *Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.*

Specifically, within Chapter 10 of the CCDP for *Key Growth Areas & Neighbourhood Development Sites* Objective 10.82 discusses the importance of the role of Barry's Land within Douglas Town Centre and notes its role to be as follows:

> *To support placemaking and public realm improvements where development proposals are encouraged to optimise placemaking opportunities through high quality design and creating or contributing towards a multifunctional, inclusive public realm comprising streets and spaces that can accommodate a range of appropriate uses and activities which will assist in improving the attractiveness of Douglas and introducing greater levels of landscaping, public art, vitality and surveillance.*

Within Objective 10.321 the Plan states the following regarding the site:

> *The identification of Land at Barry's Field as a local transformation site represents an opportunity to incorporate, a comprehensive high-quality mixed-use development that positively responds to Carrigaline Road, Church Street and Church Yard Lane. This has the potential to incorporate a mix of employment generating uses, homes and community infrastructure into an underutilised infill site and introduce public realm improvements and pedestrian permeability that will improve the overall urban experience in this part of Douglas. During the lifetime of the Plan, the telephone exchange facility directly to the south could come forward as part of a comprehensive scheme with the Barry's Field Site or independently but having regard to the need to integrate and contribute towards the design ethos and mix of uses proposed at Barry's Field.*

The subject site is within an area zoned as ZO 4 – Mixed Use Development with the objective *"to provide and promote a mix of residential and other uses to ensure the creation of a vibrant and sustainable urban area."*

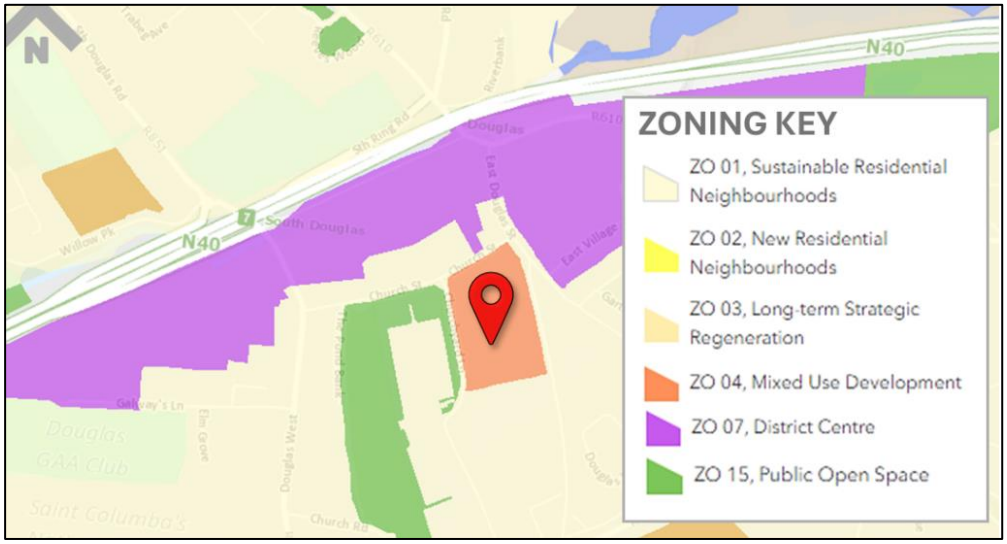

Figure 7 Extract from the Cork City Council Development Plan 2022 - Zoning.

Within the CCDP, the site is designated as Neighbourhood Development Site 2 which presents the following objective 10.100 Neighbourhood Development Sites which states:

> *Cork City Council in collaboration with landowners and relevant stakeholders will progress the neighbourhood development sites through active land management. These sites will benefit the local neighbourhood and support compact growth. Development proposals will address the relevant points highlighted by the text and icons associated with the maps and relevant objectives throughout this plan.*

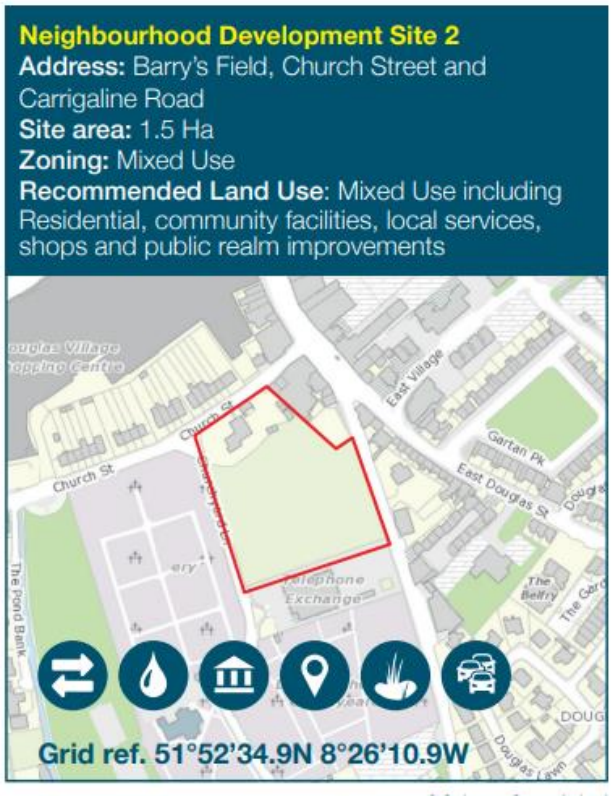

Figure 8: Extract from the Cork City Council Development Neighbourhood Development Site 2

Section 3.47 of the Development Plan focuses on Specialist Housing Provision and identifies the need for housing stock that provides opportunity for rightsizing. It is important to provide smaller units that would '*release family units*' and accommodated the ageing population of Cork City. Providing units suitable for downsizing will encourage integrated and varied communities, and developments should focus on providing '*a spectrum of housing options within neighbourhoods.'* Objective 3.11 states the following:

> *'Cork City Council will support the planning and delivery of more specialised housing and community facilities for older persons that:*
>
> *a. Are located close to community and social infrastructure required by occupants (e.g. shops, post office, community centres, etc) ensuring older people can remain part of existing communities;*
>
> *b. Are easily accessible for residents, employees, visitors and service providers;*
>
> *c. Follow best practice, including the 'Positive Ageing' model, by actively engaging and integrating within the wider community while providing a safe environment for residents;*

> *d. Create strong links between the elderly and the local community including provision of activities linked to wider community groups;*
>
> *e. Follow all relevant standards set out in the 'National Quality Standards for Residential Care Settings for Older People in Ireland' published by the Health Information and Quality Authority (July 2016) or the relevant standards for any subsequent national guidelines.'*

Section 11.78 of the Development Plan states that *'73% of new homes will need to be tailored around providing for households of between 1 and 3 people'* which emphasises the need to provide varied dwelling types across Cork City and the urban areas to meet housing market needs.

As Douglas has an existing public transport system with a good frequency, it is identified as being within a parking Zone 2 which "*reflects areas that are or will be accessible to mass transit alongside public transportation corridors*". This zoning within residential development means that dwellings consisting of 1-2 bedrooms are permitted 1 car-parking space, while dwellings of 3 or more bedrooms are permitted 2 parking spaces maximum.

Land Use Category	Zone 1	Zone 2	Zone 3	Zone 4
	City Centre & Inner City	Accessible to mass transit (existing / committed public transport)	City Suburbs and Urban Towns	Hinterland Villages and Hinterland
Maximum Standards: 1 space for each unit of gross floor area sq m unless otherwise indicated.				
RESIDENTIAL DEVELOPMENT				
Residential (1-2 Bedroom)	0.5	1.0	1.25	1.25
Residential (3 - 3+ Bedroom Unit)	1.0	2.0	2.25	2.25

Figure 9: Table 11.13 from the Cork City Council Development Plan 2022.

The Cork City Council Development Plan 2022 states that;

> *Cycle Parking: In addition to the defined quantitative standards and qualitative guidance, it will also be important that cycle storage areas are designed to encourage cycle use by being convenient and ergonomic.*

Table 11.14 Bicycle Parking Requirements sets out the expected bike parking spaces. The subject development falls under the Residential – Standard Apartments Land Use, therefore the requirement is for 0.50 per unit in suburbs:

Land Use	Cycle Parking Requirement
Residential	
Standard Apartments	1 Per Unit in City Centre / Inner Urban Areas
	0.50 Per Unit in Suburbs

Figure 10: Table 11.14 from the Cork City Council Development Plan 2022.

Within the development plan, dwelling mix targets have been identified for different market types and below outlines the mix for city suburbs within Table 11.8 of the Plan:

	Min	Max	Target
Studios / PBSA (at LRT Stops / Urban Centre / HEI Campus Only)	0%	15%	10%
1 Bedroom	15%	25%	20%
2 Bedroom	25%	40%	34%
3 Bedroom	18%	38%	28%
4 Bedroom / Larger	5%	15%	8%

Table 11.8: City Suburbs Dwelling Size Mix for Housing Developments.

Figure 11: Table 11.8 from the Cork City Council Development Plan 2022

The site is also within the Douglas Donnybrook ACA, specifically Sub-Area B. The designation of an area as an Architectural Conservation Area (ACA) under the Planning Act is a way to protect the character of Cork's historic areas. The aim is to protect their special characteristics and distinctive features while encouraging suitable contemporary development.

The area is close to the estuary on low-lying ground, above the bridging point of the Tramore River. Historically the area was the centre of commercial and administrative activity. The character is typical of a market town main street from a period before Douglas became part of the growing city. The building typology in the area is mainly of 2-3 storey rendered and painted buildings with stone slate pitched roofs.

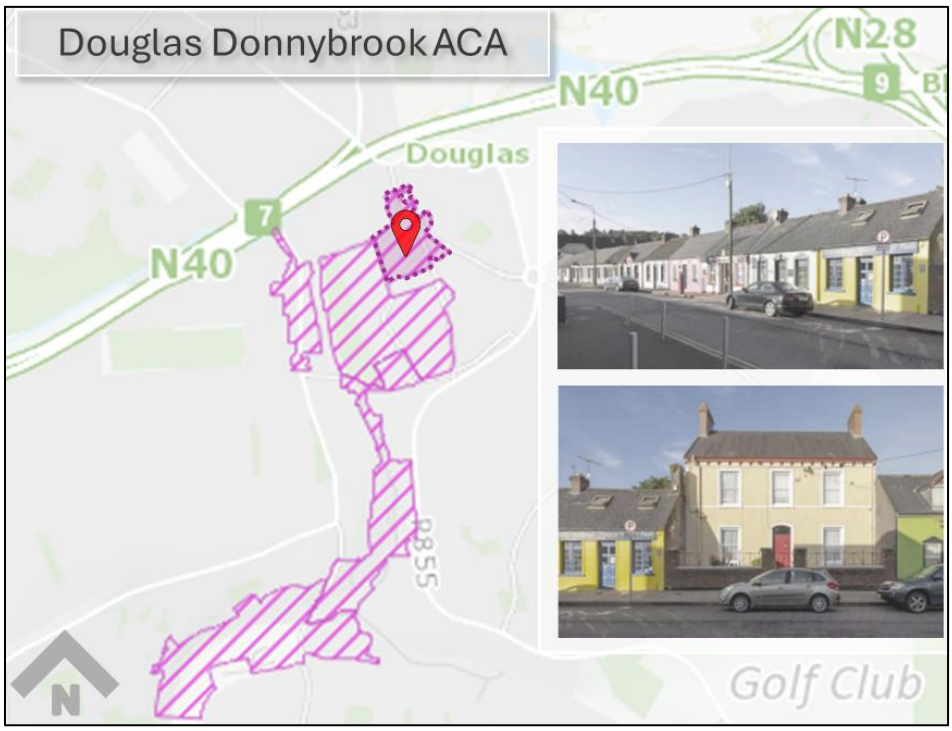

Figure 12 Douglas-Donnybrook ACA. Location of the subject site is denoted by a red pin.

Objective 8.23 within the CCDP states Development in Architectural Conservation Areas Development should have regard to the following:

> *a. Works that impact negatively upon features within the public realm, such as stone setts, cobbles or other historic paving, railings, street furniture, stone kerbing etc. shall not be generally permitted;*
>
> *b. Design and detailing that responds respectfully to the historic environment in a way that contributes new values from our own time. This can be achieved by considering layout, scale, materials and finishes and patterns such as plot divisions in the surrounding area;*
>
> *c. Historic materials and methods of construction should be retained and repaired where this is reasonable, e.g. historic windows and doors, original roof coverings, metal rainwater goods should be retained along with original forms and locations of openings etc;*
>
> *d. Repairs or the addition of new materials should be appropriate and in keeping with the character of the original structures.*

4 Planning History

Cork City Council Ref. No. 16/7137 ABP Ref: 04.249088

Cork County Council granted a notification of permission for the construction of a Food store and ancillary infrastructure in Jul 2017. However, this decision was appealed by third parties to An Bord Pleanála (ABP).

ABP refused permission on 20th March 2018, and did not accept the Inspectors recommendation to grant permission citing several reasons to refuse the application:

- The proposed design had a semi-industrial form lacking civic design and streetscape presence onto Carrigaline Road.
- It failed to incorporate a mix of uses on a prominent site within the Church Street Architectural Conservation Area.
- The development would not contribute to the conservation objectives of the area and would adversely affect its architectural conservation, as well as the visual amenities of the surroundings.

Cork City Council Ref. No. 18/5814 and ABP PL 18.302641

Lidl Ireland were granted permission by Cork County Council on the 03 September 2018, for the construction of a foodstore and ancillary infrastructure, however the decision was appealed by third parties to ABP.

ABP refused permission on 12th April 2019, citing the following reasons:

- The proposed design, scale, and massing were deemed visually dominant and out of character with the existing development in the Church Street Architectural Conservation Area and would be visually obtrusive within the Douglas village streetscape.
- The development would contravene objective HE 4-5 of the Cork County Development Plan aimed at conserving and enhancing the special character of the Architectural Conservation Area.
- Additionally, the layout and design of the proposal were seen to prejudice the delivery of a key zoning provision objective and the development potential of adjoining lands to the north, hence deemed contrary to the proper planning and sustainable development of the area.

5 Pre-Planning Consultation

A S.247 meeting took place with Cork City Council (CCiC) on the 19th June 2024 and feedback was issued on the 25th June 2024. As recommended by CCiC, a further pre-planning meeting was held with the Council on the 14th August 2024 with Cork City Council. A response to the Councils S.247 feedback has been outlined in Appendix A of this report.

Following the S.247 meeting, revised details were submitted to Cork City Council and a Section 32B meeting which took place on 19th November 2024 and the Council issued an LRD Opinion on the 16th December 2024 and a response to this opinion has been provided as a standalone document with this application. Following receipt of the Opinion from Cork City Council, further details have been revised and additional details have been submitted to address the feedback received from the Council.

6 Assessment

The proposed development involves the construction of 124 apartments, ground floor cafe and office units and all associated development site works at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork.

6.1 Compliance with Current Planning Policy

The proposed development is located on lands zoned for mixed use and it is considered that the construction of the apartments complies with the objectives for the site as per the Cork City Development Plan.

6.1.1 Proposed Housing Mix and Density

The proposed development consists of 124 no. units comprising of:

- 50 no. 1 bed units (40.3%)
- 64 no. 2 bed units (51.6%)
- 10 no. 3 bed units (8.1%);

Following feedback from a S.247 and a S.32B meeting with Cork City Council, the proposed unit mix has been altered from the submitted detail lodged at the pre-planning stage held on the 19th of June 2024. The revised scheme has introduced a larger no. of 3 no. bed units' range which have increased from 5 no. units to 10 no. units (which is 8.1% of the development). It is proposed that 52.4% of units will be dual aspect. All units will have private open space, in the form of a courtyard if on the ground floor, and balconies for the apartments on the upper floors all of which comply with the apartment guidelines.

In regards to the proposed unit mix, the suitability of the dwelling mix within a proposed development is not solely dependent on whether it conforms to the targets for city suburbs as per Table 11.8 in the CCDP 2022-2028. Rather, the proposed dwelling mix should be compared to both the dwelling mix targets of the CCDP 2022-2028 and the current state of the dwelling mix in a catchment area. A separate dwelling mix report forms part of this submission which outlines more than 80% of the dwellings in the catchment area of Douglas are units of 3 bedrooms or larger and 1 in 5 of the dwellings are 2 bedrooms or less. While the current dwelling mix of the catchment area is off the targeted housing mix as per the CCDP 2022-2028 (below), the mix of 1- and 2-bedroom units within the catchment area is under the targeted mix but over the targeted mix for 3- and 4-bedroom units (refer to table below).

Therefore, the current mix of dwellings by number of bedrooms in catchment area needs to be readdressed to increase the share of 1- and 2-bedroom dwellings and to decrease the share of 3-and 4-bedroom units within Douglas.

Number of bedrooms	Catchment	Proposed development	CCDP target
Studios / PBSA	N/A	N/A	10%
1 bedroom	3.1%	40.3%	20%
2 bedrooms	14.3%	51.6%	34%
3 bedrooms	43.6%	8.1%	28%
4 bedrooms or larger	33.3%	0%	8%
No. of bedrooms not stated	5.7%	N/A	N/A
Total	100.0%	100%	100%

Table 1: Composition of housing by number of bedrooms in catchment area, for the proposed development, and CCDP targets (Source: Cork City Council, 2022; CSO, 2023)

The proposed development will ensure that the share of 1- and 2-bedroom units in the catchment area will increase relative to the share of 3- and 4-bedroom units. Thereby, increasing the range of housing options in the catchment area through readdressing the current uniform mix of dwellings by number of bedrooms in the catchment area.

The proposed density for this development is 153.7 units per hectare which is considered appropriate for this site which is identified as a City Suburb. This density is consistent with the provisions of Sustainable Residential Development and Compact Settlements 2024 as referenced above in Section 3.1 of this report.

We submit that this proposal for 124 new units aims to meet this approach and assist in fulfilling the Council's objective of delivering more housing in an attempt to alleviate the current housing crisis.

6.1.2 Parking

The proposed development has allowed for 26 car-parking spaces (0.21 per unit). The development could provide up to 125 car-parking spaces based on the maximum standards as per the Cork City Council Development Plan, however, the number of car-parking spaces has been limited to be more in line with Sustainable Residential Development and Compact Settlement Guidelines 2024. The site is in close proximity to amenities and the public transport network which will ensure less reliance on the car.

Car parking on site will comprise of various designated spaces for various uses such as accessible spaces, car club uses, café patrons and EV spaces. There will be no associated spaces for residential uses and all spaces will be shared to maximise efficiency. A car parking management plan has been prepared by MHL and Associates which will ensure the shared resources and flexibility for various users.

The development proposes 208 residential bicycle parking spaces, 62 cycles spaces for visitors, and 4 no. spaces identified as 'other', providing a total of 274 cycle spaces on site. This complies with the standards set out in the Development Plan, as it provides for 2.21 spaces per unit and is distributed throughout the site for ease of use for the residents.



Figure 13 Subject Site with car-parking areas highlighted *BLUE*, and bicycle parking highlighted *PURPLE*.

6.1.3 Part V Proposal

Part V, S.96 of the Planning and Development Act 2000 (as amended) applies to this application. The Part V proposal submitted fulfils the 20% obligation on site. It is proposed that 7 no. units on the ground floor, 7 no. units on the first floor. 6 no. units on the second floor and 5 no. units on the third floor of the development will be for Part V compliance, and this will total 25 no. units. A Part V Costings and Methodology report forms part of this LRD application. This provides a range of units, and these are noted to be as follows:

Level	Type			Total
	1Bed	**2Bed 3P**	**2Bed 4P**	
Ground Floor	3	0	4	**7**
First Floor	3	1	3	**7**
Second Floor	2	2	2	**6**
Third Floor	2	2	1	**5**
Total	**10**	**5**	**10**	**25**

Table 1 Part V Proposal

6.2 Design Approach

The proposed development has been designed to provide high quality residential units that will contribute positively to Douglas and deliver much needed housing in Cork. The proposal positively contributes to the mix of uses and dwelling typologies available in the neighbourhood.

The proposed buildings are designed to be set back from the boundaries so as to be mindful of the character of the area and ensure its preservation. Within the design, the proposed buildings are set back from the western boundary to preserve the character of Churchyard Lane, and from the southern boundary to retain the screening and attractive green setting which are provided by the mature trees. The development provides a public pocket park and an east-west pedestrian route through the northern part of the site as well as retaining trees at the northeast corner which contributes to the green backdrop to the village. A lower development block provides active frontage to Carrigaline Road as well as to the proposed park.

The proposed building fabric is well considered, and the proposal enhances the urban design context for public spaces and key thoroughfares within the scheme.

The proposed building heights range from 1 to 5 storeys, with majority of the development being 5 storeys. This is in line with the existing building heights in Douglas which are 3 to 4 storeys. The proposed building heights are in line with the vision for Douglas in the Cork City Council Development Plan 2022.

The set back of the buildings and the retention of a significant number of trees will allow the buildings to integrate into the existing context successfully. The proposed height is also supported by the location of the site which is in close proximity to Douglas Village as well as existing and proposed public transport routes.

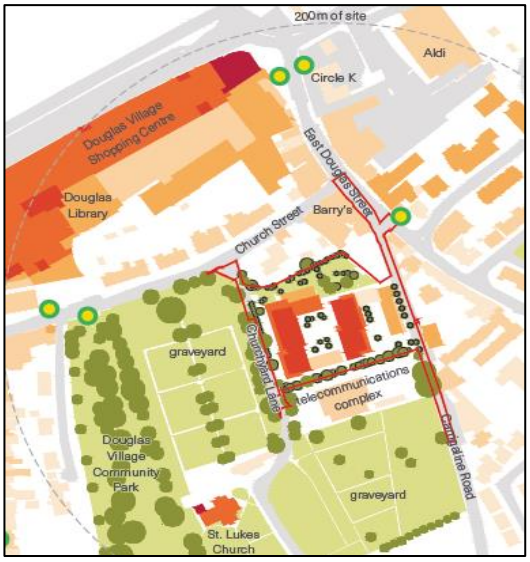

Figure 14 Proposed building heights as illustrated by O'Mahony Pike.

The proposed development has been designed in such a way that it allows scope for future development to the North of the site, which would allow for a retail/apartment development on Church St., contributing to the existing retail/commercial frontage. This would align with the Development Plan zoning, which is for a mixed-use development.

Following feedback from Cork City Council, the ground floor units to Block 1 have introduced a non-residential area which will comprise a mix of office

and café uses. The provision of a new public open space and pedestrian routes through the site will also enhance the public realm of the area. The proposed development will bring variety and activity to the area with the provision of ground floor active uses.

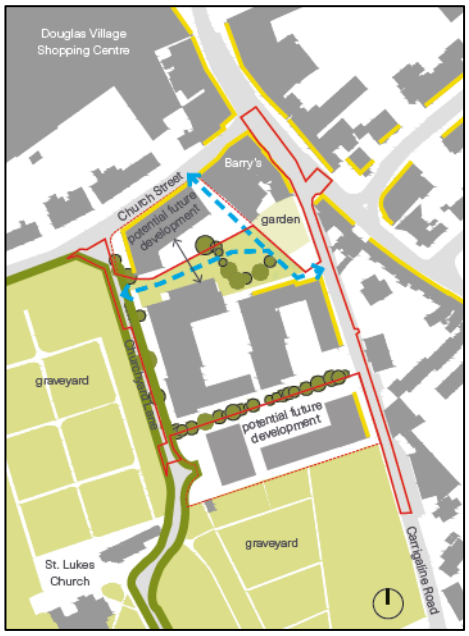

Figure 15: Proposed concept plan for future retail/commercial frontage prepared by O'Mahony Pike Architects.

The comprehensive network of pedestrian/cycle routes running through the scheme emphasises pedestrian and cyclist access throughout the site. The permeability of the development has been carefully considered by ensuring the internal footpaths link the different areas and make the site accessible to all. Maximum connectivity and permeability for pedestrians and cyclists are achieved within all parts of the site which are linked by footpaths and narrow/low trafficked road to enable safe cycle moments.

The proposed building materials include smooth grey brick in two complementary tones reminiscent in colour of the existing stone wall around the site and referring to Douglas' brickmaking history. Standing seam metal cladding and metal windows/doors/balconies in a darker grey tone will continue this theme throughout the development. It is noted that the elevations of the buildings are broken down into bays for a more interesting elevation. This is also reminiscent of traditional fenestration patterns. The careful selection of materials used will contribute to the mindfulness of the character of the area and ensure its preservation.

Other aspects of the design that respond to cues in the historic environment include the breaking down of long blocks into shorter sections to reflect the smaller scale of the plots of the historic commercial buildings of Sub - Area B and the use of fenestration with a generally vertical emphasis.

In terms of shadowing, a daylight/sunlight study has been carried out by DKP International, which concludes that 50% of the amenity spaces achieve the

required 2 hours of sunlight on the 21st March and is in accordance with the BRE guidelines which confirms that the amenity spaces will be adequately sunlit throughout the year.

While there will be some minor shadowing during the morning to afternoon onto the neighbouring properties, these are deemed to be within standards set out in the BRE Report – Site Layout and Planning for Daylight and Sunlight BR209 2022 and are therefore deemed compliant.

6.3 Height and Massing

The proposed scheme ranges in height from 1-5 storeys. The proposed development is of high architectural design quality and the applicant has successfully integrated the scheme into its urban and landscape setting. Building heights are adapted to respond to site conditions, with heights of 2/3 storeys proposed along Carrigaline Road, in keeping with Douglas Town Centre heights, and taller north-south blocks further within the site where they sit comfortably within the existing mature trees enclosure. The 2 to 3-storey Block on Carrigaline Road strengthens the urban fabric of Douglas Town Centre and signals the main pedestrian access point of the scheme. Further to the west of the scheme, the proposed scale of the development is appropriate for an extremely well serviced site in a town centre location.

The submitted photomontages prepared by Modelworks confirm the site has the capacity to accommodate the development within a strong natural screen provided by the boundary trees and existing hedges. Please refer to the submitted photomontages for further information.

As outlined within the Architectural Heritage Impact Assessment report by John Cronin and Associates (outlined in Section 6.8 below), the proposed development *will not give rise to negative impacts* on the ACA. The impact on the ACA and protected structures within the vicinity of the development is ***negligible*** as the proposals will only result in very slight changes to the visual character of the area of Douglas village. The scale, massing and proportions of the new buildings sit comfortably within the ACA.



Figure 16 Proposed Photomontage by Modelworks – View 7 (winter view)

As seen within Viewpoint 7 of the Photomontages (which is a winter view), there is a transition in scale from 2-3 storeys along Carrigaline Road to a taller 4-5 storey block. The 4-5 storey block provides a setback from the street and is partially screened by the existing retained trees and vegetation, as such, the development sits comfortably within the area of Douglas Village. From the above viewpoint, it is clearly demonstrated that the proposed development appears below the ridgeline of the two storey buildings either side of the junction.

Looking at the wider area of Douglas, the proposed tallest height at the centre of the site is lower than Douglas Village Shopping Centre which is located 100m to the north of the site. An appropriate distance is kept from the only adjoining residential property to the north. These measures all contribute to the good integration of the scheme within its existing setting, while preserving an appropriate density in this town centre location.



Figure 17 – Section from OMP Architecture illustrating development lower than Douglas Village Shopping Centre.

As outlined in the Design Statement by O'Mahony Pike Architects, the proposed heights of the building respond to the existing context, as detailed below.

- Along Carrigaline Road, Block 1B/C is generally 2 storey with setback, with a small portion to the north rising to 3 storeys to mark the main pedestrian entrance to the site and access to the public open space and east west pedestrian route. The proposed height reinforces the emerging 2 to 3 storeys datum along the road.
- To the west, Block 2 is 4+1 storeys high, responding to the generous open expanse of the graveyard. The retained existing trees on site, as well as the trees within the graveyard, will ensure that the scheme is barely visible from this location (see image below). The central Block 1A is also generally 4+1 storey, with a setback along the majority of the elevation to Carrigaline Road, ensuring a gradual rise in proposed heights as seen from the east or the west.
- To the south and north, the scheme presents as gables and lower rise elements, largely hidden from view by the retained existing trees.



Figure 18 Extract from Design Statement by O'Mahony Pike Architects.



Figure 19 Existing Viewpoint 11 prepared by Model Works.



Figure 20 Proposed Viewpoint 11 prepared by Model Works.

6.4 Amenity and Open Space

As part of the overall amenity provision, it is proposed that a number of accessible and usable public open spaces with passive surveillance will be provided within the proposed development. A landscape masterplan proposal has been prepared and submitted by Cunnane Stratton Reynolds Landscape Architecture.

It is noted that the proposed buildings will be located at least c. 18.3m from the existing residential properties on Carrigaline Road, with the minimum distance being 18.8m from the existing single storey house along Church Street.

It is proposed that the development will retain the existing trees and walls on the site where possible, particularly to the south and western boundaries. The site will consist of two pockets of public open space, and two-pockets of communal open space.

As per the Sustainable Urban Housing: Design Standards for New Apartments, a minimum of 746m^2 of communal open space is required. It is proposed that the development will accommodate 789.7m^2 of communal open space, and 1,444.9m^2 of public open space, where 1237.5 m^2 minimum

would be required. It is considered the quantum of open space being provided complies with the requirements of the CCDP and Sustainable Urban Housing: Design Standards for New Apartments.



Figure 21 Proposed landscape strategy prepared are Cunnane Stratton Reynolds (CSR).

6.2 Traffic

As outlined earlier in this report, the site is well served by various existing bus routes connecting to the City Centre and a selection of suburbs. There are three bus stops serving Route Nos. 207, 216, 219, 220 & 223 just to the north and west of the site, and many more bus stops are within walking distance. The site is within 500m of a planned high frequency urban bus service. Proposed Route 3 with a 10-minute frequency has stops just to the north of the site at Douglas Village Shopping Centre.

As outlined within the Infrastructure Report by DOSA Consulting Engineers, the proposed development is designed to ensure that the traffic generated can be accommodated within the surrounding road network and will not have an adverse impact on the surrounding road network. A car parking ratio of 0.21 spaces per unit has been proposed within the development which will have the following positive effects;

- Incentivise residents to use public transportation, walk, or bike;
- Reducing reliance on private vehicles and promoting a more sustainable transportation system;

- Create more green spaces, and amenities that enhance the overall quality of life in the development; and
- Encourage a more mixed-use, walkable urban environment with diverse activities, shops, and restaurants which will attract residents and visitors.

A detailed Traffic and Transport Assessment (TTA) has been prepared with the LRD application to consider the impact of the proposed development on the local road infrastructure and the scope of the TTA has been agreed with the Traffic & Traffic Section of Cork City Council. The TTA presents the number of local junctions to be used for traffic modelling (as agreed with Cork City Council) as shown below in Figure 22. The TTA found that in the worst-case scenario, the development will generate a turnover of 52 inbound and 52 outbound vehicles during the peak hour. It also assessed the cumulative impact of the proposed development on all five junctions. The findings conclude that the traffic increase on the existing junctions (J1, J2, J3 and J4) will be less than 5%. The proposed development Junction J5 will experience the highest increase in traffic flow, with an increase of 12.28%; however, as Carrigaline Road is a one-way carriageway, there are no capacity issues expected at this junction. It is concluded that the analysis carried out shows minimal impact from the proposed development vehicles flows on the surrounding road network.



Figure 22 Extent of Junction Modelling undertaken in the TTA (extract from MHL)

6.6 Infrastructural Services

A number of reports have been prepared by DOSA Consulting Engineers which has been submitted as part of this application. The reports include the Construction Environment Management Plan, Construction Resource Waste Management Plan, Infrastructure Report and Drainage Impact Statement. The reports cover servicing and access arrangements.

A Confirmation of Feasibility (COF) received from Uisce Eireann is attached as Appendix A of the Infrastructure Report by DOSA Consulting Engineers. The COF noted that both water and wastewater connections are feasible subject to upgrades. Please refer to the submitted drawings and reports for further detail. A statement of Design Acceptance has also been provided by Uisce Eireann which is submitted as part of this application.

6.7 Flooding

ARUP have prepared a Flood Risk Assessment as part of this application which assesses the residual risk of flooding to the site, the risk of pluvial and groundwater flooding to the site of the proposed development. The impact of climate change on flood risk to the site has also been considered. The FRA report details the Flood Risk Assessment carried out as part of the planning application and has been undertaken in accordance with the Guidelines for Planning Authorities on the 'The Planning System and Flood Risk Management' published in November 2009, jointly by The Office of Public Works (OPW) and the then Department of Environment, Heritage and Local Government (DEHLG).

The site lies within the defenced area of the Douglas Flood Relief Scheme and is defended to a standard of protection equivalent to the Q100 event with an additional allowance for freeboard. The risk of fluvial flooding to the site is therefore limited to design exceedance fluvial events and possible climate change scenarios which may lead to overland flow along Churchyard Lane. In such an event, the risk of ingress to the site will be managed by ensuring the FFL of the proposed development are set at a suitable elevation and also by incorporating a high ridge in the landscaping external to the building to ensure that any water surface water is deflected away from the buildings.

As outlined in the FRA report by ARUP, the risk of tidal, groundwater and pluvial flooding to the site is very low. There is no off-site impact associated with the development and access and egress routes to the development will be maintained at all times via the Carrigaline Road. Please refer to the report for further details.

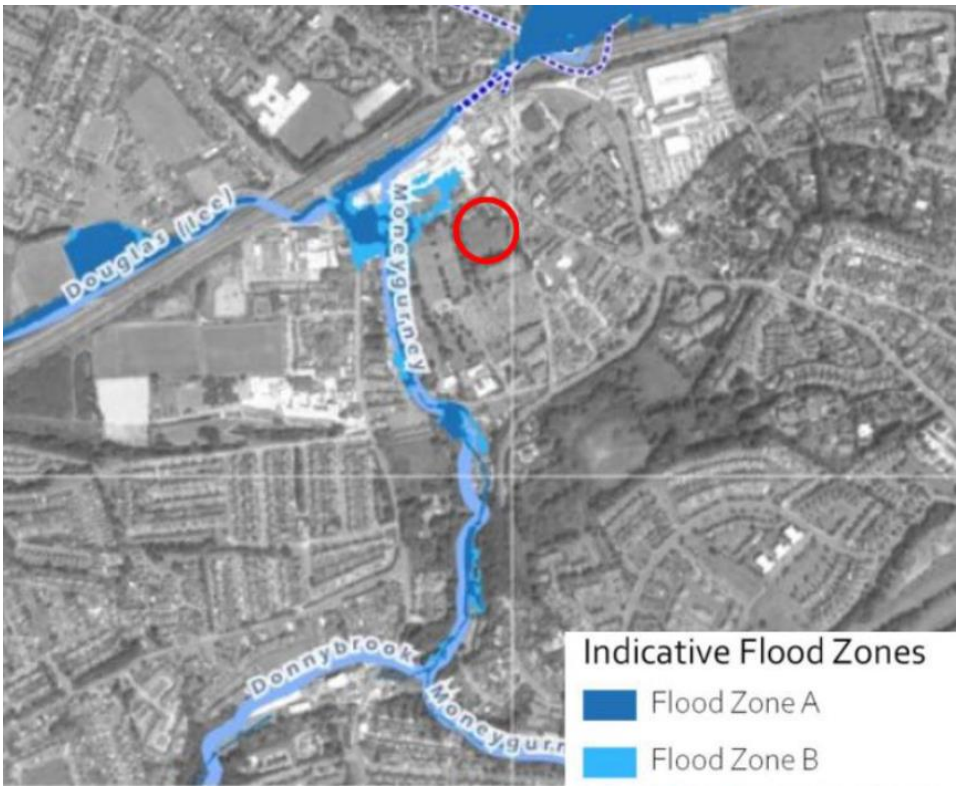

Figure 23: Flood Zoning as per CCC Development Plan (extract from FRA by ARUP)

The report concludes that the proposed development considers all of the criteria listed in the OPW Planning Guidelines and the Cork City Council Development Plan 2022. The report deems that the planning application for the development is in full compliance with the various planning requirements.

6.8 Archaeology

There are no recorded archaeology sites on the proposed site. As part of a previous application on site, Purcell Lane Archaeology carried out licenced archaeology testing, and three trenches were excavated in 2017. No features or finds of archaeological significance were identified and no further archaeological works were recommended.

An Archaeological assessment by Purcell Lane Archaeology has been undertaken and forms part of the final LRD application to Cork City Council.

6.9 Conservation

An Architectural Heritage Impact Assessment by John Cronin and Associates forms part of this LRD submission. The Site is within the Douglas Donnybrook Architectural Conservation Area (ACA) – Sub Area B. It is noted that there are no protected structures or NIAH structures within the subject site. The existing character of the site is a typical market town main street from the period before Douglas become part of the growing city, with buildings forming a strong street line.

The existing site is relatively flat open green space and is screened by mature trees an existing dwelling and commercial buildings. On the southern boundary the site is lined by stone lined earthen ditch, while on the east boundary the site is lined by stone wall sand mature trees. As outlined within John Cronin & Associates report, the proposed setbacks from existing buildings and the retention of a significant number of trees as well as the existing boundary treatments mean that the development can be integrated successfully into its context. The provision of a new public open space and pedestrian route through the site will enhance the public realm of Douglas. The report notes that the proposed development will add to the architectural and urban evolution of the settlement. The proposed building will have a distinct twentieth-first century appearance, but it has been designed to integrate into its setting. It also outlines that the verified photomontages taken along the main street (View 7 – shown below) illustrate that the scale of development will not have a negative impact on the village core.



Figure 24: Photomontage (View 7) by Modelworks

The proposed development is of high architectural design quality and the applicant has successfully integrated the scheme into its urban and landscape setting. The submitted photomontages prepare by Modelworks confirm the site has the capacity to accommodate the development within a strong natural screen provided by the boundary trees and existing hedges.

As confirmed within the report, the proposed development *will not give rise to negative impacts* on the ACA. The impact on the ACA and protected structures within the vicinity of the development is ***negligible*** as the proposals will only result in very slight changes to the visual character of the area of Douglas village. The scale, massing and proportions of the new buildings sit comfortably within the ACA.

6.10 Landscape and Visual Impact Assessment (LVIA)

A Landscape, Visual Impact Assessment (LVIA) has been prepared by Cunnane Stratton Reynolds as part of this LRD submission. Within the report, the landscape was identified as being of 'medium' sensitivity and outlines that the existing site boundary vegetation heavily mitigates potential visual effects

associated with the development. Additional planting along site boundaries such as evergreen native species such as Holly (Ilex aquifolium) will supplement the screening effect of the vegetation during winter months and will act at additional remedial mitigation measures. Proposed tree planting to the front of the new units along Carrigaline Road will also have a mitigating effect. Therefore, the magnitude of change is considered to be 'Medium' with a moderate level of landscape effect, as the development will incur noticeable change transforming the greenfield site to a high-density residential development.

A total of 15 no. views were prepared to accompany the LVIA, all the views were agreed with Cork City Council's Conservation Officer. It is submitted that the photomontages demonstrate that the subject site has the capacity to accommodate the development within a strong natural screen provided by boundary trees and hedges. Where site boundary vegetation is to be removed along Carrigaline Road, the proposed housing units step down in height to facilitate integration along the existing street, and new tree planting will occur along the adjoining street. There are no adverse landscape visual effects arising from the photomontages, and remedial mitigation in respect of some of the winter views can be provided by additional planting along the site boundaries as outlined above. Please refer to the submitted document for further details. The report concludes that 'there will be no effect on any panoramic or linear views'.

6.11 Arboricultural Impact Assessment

An Arboricultural Impact Assessment has been completed by Heritage Tree Care Ltd. which identifies trees to be removed, provides information on the retained trees and their protection, and assesses the potential impact which may occur between the subject trees and the proposed development. A tree constraints plan forms part of this submission showing the location of the individual trees and tree groups to be retained or removed. The Tree Constraints plan aids development and outlines encroachment areas where construction must be prohibited; and by doing so promotes the safety of the area's trees- before, during and after any construction activities take place. Protective measures of retained trees include protective fencing, ground protection measures and trunk protection with limb wrapping, please refer the submitted details for further information. It should be noted that none of the mature medium/high retention value trees within the boundary require removal to facilitate the development.

6.12 Daylight and Sunlight Assessment

A daylight and sunlight assessment has been undertaken by DKP International which outlines an overall good level of daylight for the for the proposed development has been achieved under the National Annex Guidelines and the proposed development will provide a good level of residential daylight amenity to future occupants.

The report also concludes that 50% of the amenity spaces achieve the required 2 hours of sunlight on the 21st March in accordance with the BRE

guidelines which confirms that the amenity spaces will be adequately sunlit throughout the year.

A review of the impact on daylight and sunlight reception using the vertical sky component (VCS) assessment was also undertaken and it was concluded that the new proposed development's effect on daylight reception in the neighbouring rooms is all within the constraints and recommendations of the BRE Report – Site Layout and Planning for Daylight and Sunlight BR209 2022 and are therefore deemed compliant.

6.13 Noise and Vibration

As requested by Cork City Council at the S.248 meeting, a Noise and Vibration Impact Assessment has been prepared by CLV Consulting as part of the LRD submission. The report notes that during the construction stage there will be slight to significant impacts on the adjacent residential noise receptors. Further feedback from Cork City Council at the S.32B meeting required the report to include offices within Montrose House as a receptor and the telecommunication building to the south of the site. Following this feedback, the Noise and Vibration Impact assessment was updated to include both buildings as receptors.

Further to this, the Council also requested additional noise monitoring at location NM1 (from Barrys of Douglas Beer Garden) as the previous monitoring (taking during 4th-6th October 2024) occurred during an orange rainfall warning. As requested by the Council. Subsequent noise measures were carried out at NM1 during g weekends in 22nd -24th November 2024, 29th -1st December 2024 and 6th -8th December 2024. The average ambient noise level measured during the busiest 18:00 - 01:00hrs pub operation hours during these weekend periods ranged between 54 - 57dB LAeq which was relatively consistent with the 52 - 56dB LAeq range average ambient noise level range measured during the 4th-6th of October 2024 period. Given this consistency, it can therefore be concluded that the measured noise levels would be considered typical of the ambient noise level in the vicinity.

Within the report, it is expected that during the operational phase the building services and plant will be below the amenity noise levels in the vicinity. The café, car parking and additional traffic on public roads noise emissions will be negligible.

The amenity areas provided within the courtyard area of the site will have the noise levels mitigated by the proposed development. Other noise control aspects include urban hum which consist of traffic noise, building service emissions from adjacent buildings, pedestrian activities and the beer garden. The level of noise emitted by the residents of the proposed development are considered to be in line with the existing ambient noise levels.

In addition, recommendations have been made to mitigate the inward noise impact by incorporating façade design that will incorporate superior sound insulation glazing / façade elements to achieve a quiet internal acoustic environment that will comply with criteria applicable to low level residential bedroom environments.

6.14 Appropriate Assessment and Ecology Assessment

Article 6.3 of the Habitats Directive 92/43/EEC requires that an Appropriate Assessment (AA) should be carried out where plans or projects may have a significant effect on the conservation objectives that would ultimately affect the integrity of Natura 2000 sites.

An AA Screening Report and Ecological Impact Assessment (EcIA) for the proposed development has been prepared for the subject development by Limosa Environmental and submitted in support of the LRD application.

As outlined within the submitted EcIA by Limosa Environmental, a habitat survey was undertaken in May 2024 and July 2024. This involved a walkover survey of the study site to classify and map habitats, and describe the characteristic species associated with existing habitats. The habitats recorded are as follows:

- Dry Meadows and Grassy Verges;
- Mature treelines (mostly sycamore and Ash);
- Hedgerow (hawthorn and cypress bushes);
- Bramble dominated scrub;
- Invasive Alien Species – Japanese Knotweed

The Japanese Knotweed on site has been surveyed and a management plan has been completed by O'Donovan Agri which is submitted with the LRD application.

A baseline bird assessment was carried out in May and June 2024 and it has been confirmed that no red listed species of high conservation were recorded on site.

The reports also addressed the potential impact on nearby European Sites, which are within the zone of influence of the proposed development including the Cork Harbour Special Protection Area (SPA) and the Great Island Channel Special Area of Conservation (SAC). The proposed development may have potential impacts to the Cork Harbour SPA as surface and stormwater runoff discharges into the Douglas Estuary and the Cork Harbour. In addition, although the SAC is not directly downstream, there could be indirect impacts through tidal and wind-driven water movements that link the SAC to the wastewater treatment plant discharge point. Mitigation measures for the Cork Harbour SPA and Great Island Channel SAC include the implementation of a Sustainable Drainage System (SuDS) with attenuation tanks, flow control devices, and pollutant separators to manage stormwater runoff and prevent contamination. A Construction Environmental Management Plan (CEMP) will minimize sedimentation and accidental spills, with protective measures like silt traps and buffer zones. Wastewater will be treated at the Carrigrennan Wastewater Treatment Plant, ensuring compliance with discharge standards. Habitat retention and enhancement, including treelines and hedgerows, will support biodiversity, while regular monitoring and collaboration with

relevant authorities will ensure adherence to mitigation measures and conservation objectives

Bat Survey

A bat survey has been undertaken by Greenleaf Ecology on the 19th August 2024 and September 2024 and findings outlined in the report show that the study area is considered to be of moderate suitability for foraging and commuting bats due to the presence of connectivity to other suitable habitats in the wider landscape. However, there is low potential for roosting within mature trees in the field boundary that support potential opportunistic roosting features for individual bats such as Ivy growth.

Results from the bat surveys undertaken in August and September 2024 indicate that three species of bat, namely soprano pipistrelle, common pipistrelle and Leisler's bat commute to the site to forage. A low level of activity and a low diversity of bat species was recorded within the proposed site. Leisler's bat and common pipistrelle were recorded early in the evening; it is likely that a minor summer roost for common pipistrelle is present in the environs of the north-east of the site and it is considered likely that a summer roost for Leisler's bat is present close to the site, but outside of the site boundary.

Mitigation measures have been outlined within the submitted report during the construction and operational phase of the proposed development. These include pre-construction inspections of trees with potential roost features, with felling supervised by a bat specialist to ensure bats are safely relocated. Lighting during construction will be directed away from roosting and foraging areas, using shields and cowls to reduce light spill. During operation, a sensitive lighting plan will be implemented, incorporating dark buffer zones and warm-spectrum, low-intensity LED lighting to minimize disruption to bats' foraging and commuting activities. Habitat enhancements, such as retaining treelines and installing bat boxes, will also support local bat populations.

6.15 Childcare Need and Demand

McCutcheon Halley have carried out a preliminary childcare demand assessment of the existing childcare facilities within a 2km radius of the site, their capacity and the demand for places likely to be generated by the proposed development. A 2km radius has been set, which equals to an approximate 6-minute drive time by car.

CDP indicates that due to changes in household trends and demographics, there is a need to 1 and 2 bedroom units. These smaller units aim to care for all age groups and needs, including the provision of rightsizing. While the proposal provides 1-bed units that are beyond the targets set out in the CDP, this creates a balance in the area, as majority of neighbouring dwellings are 3-4 bedrooms and accommodate larger families.

Appendix 2 of Childcare Facility Guidelines for Planning Authorities 2001 states that a single facility accommodating 20 children is to be provided for developments of 75 plus dwellings in new housing areas. The Guidance

acknowledges that other case-specific assumptions may lead to an increase or decrease in this requirement. Appendix 2 also states that the threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas. In addition, Section 4.7 of the 2023 Apartment Guidelines notes that one-bedroom units should not generally be considered to contribute to a requirement for any childcare provision, and this may also apply part or whole, to units with two or more bedrooms.

The development yield of 124 no. units, consisting of 50 no 1-beds, 64 no. 2-beds and 10 no. 3 beds is expected to result in 228 persons. It is deemed appropriate that 1-bed units will not yield any families with children, therefore this reduces the number of units that could accommodate a family with children to 74 no. (2-bed and 3-bed units). Out of the 74 no. units, it is expected to yield only 25 children aged 0-18. However, if we discount the 2-bed, 3-person units, the development is reduced further to 64 no. units that could potentially accommodate a family with children. However, this results in the development being under the 75 dwelling threshold, negating the need for a childcare facility.

Further evidence from the 2022 Census shows that a creche would not be viable as part of the proposed development. According to the 2022 census for the buffer area, there are a total of 4,137 no. children aged 0-18 years, 1,010 no. of them area aged 0-4 years old which represents 24.4% of the 0–18-year-old population. The census also demonstrates that out of the 1,010 children, 598 of them are in childcare, resulting in 59.2% of the 0–4-year-olds being in childcare. In addition to this, based the data from Table F3011 (from 2022 Census), which forms Profile 3 – *Households, Families and Childcare*, within the Cork City Council area, 56.7% of children aged 0-4 are in a formal creche, Montessori, playgroup or an after-school facility. Other childcare options include unpaid and paid relative, an in-home childminder, Au Pair or nanny etc. This breakdown is demonstrated in the table below.

It is estimated that the development will produce a total of 228 no. persons, 25 of which will be children aged 0-18 years. Out of the 0–18-year-olds, it is expected that 4 children will be aged 0-4. Following this, we determined the childcare yield the development will produce, and this was concluded to be 2 children aged 0-4 who will be in need of childcare; however, if this is further broken down by childcare service type, it is estimated that 1 childcare space will be required in a creche or similar type service.

0-to-4-Year-Olds	Cork City Council	Ireland
Unpaid relative or family member	21.7%	19.2%
Paid relative or family member	3.3%	4.3%
Childminder (in childminder's home)	11.5%	15.2%
Au pair/nanny/childminder (in child's home)	5.4%	4.1%
Creche/Montessori/playgroup/after school	56.7%	56.0%
Other (including special needs facility, breakfast club)	0.6%	0.5%
Type of childcare not stated	0.8%	0.7%

Table 2 Data from Table F3011, from Census 2022

The assessment concludes that, within 2km of the site, there is a total of 16 no. creches with a capacity of 820 no. spaces. As the development is expected to result in only 1 no. children needing a childcare facility, it is deemed that a 20 no. child creche as part of the development would not be viable. Further to this, the current scheme falls below the threshold of 75 units (2 bed or larger) where consideration for a creche must be given. Notwithstanding that the proposal is subthreshold, consideration has been given to the demographic profile of the area and the unit mix envisioned in the City Development Plan in the Childcare Guidelines.

6.15.1 Rightsizing

It is noted that the development is proposed as part of a rightsizing initiative, and research has been completed as part of this proposal, including a review of guidance by 'Age Friendly Ireland' and a case study carried out by AARP (nonprofit organisation).

Rightsizing focuses on schemes that provide people over a defined age the opportunity to move out of larger homes into more age-appropriate accommodation. The approach has been pioneered by Cork City Council through schemes like the award-winning 30-unit Arus Mhuire development in Blackrock.

Therefore, it is expected that the development will provide rightsizing opportunities to residents in Douglas and will not result in large numbers of families with children. As set out in Section 3.47 of the Development Plan, due to an *'ageing population and under-occupation of Cork City's housing stock means that providing housing products that suit "rightsizing" (downsizing), to release family units, is a key priority for Cork City.'*

7 Conclusion

The proposed development consists of 124 no. residential unit and all associated site works, on lands zoned for mixed use in Douglas. It is considered that the proposed development on the site will provide an opportunity to provide a good mix of new apartments to assist in achieving the additional housing units required in Douglas. We consider that the proposed development at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork is consistent with the policies and objectives of the Cork City Council Development Plan and other national policies and guidelines.

Appendix A – Response to Councils feedback from S.247 Meeting

(Please note that a response to the 32B meeting/LRD Opinion has been provided as a standalone document with the LRD application)

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Principle of Development Supported Site is earmarked as a neighbourhood development site – recognised in the CPD as a very important and integral site within the overall context of Douglas so very much welcome that it's coming forward. However, important to outline that there are fundamental material concerns particularly in relation to the lack of mixed use and the scheme's contribution to placemaking within its receiving environment.	Noted The scheme has introduced a mixed use which comprises of a café and office uses on the ground floor facing the Carrigaline Road. The scheme provides for large outdoor amenities and seating area which contribute to an active area and will provide animation and footfall at the sites main entrance.
ZO 04 Mixed Use Development: *To provide and promote a mix of residential and other uses to endure the creation of a vibrant and sustainable urban area.* Strong residential element which delivers quality compact growth is very much supported but not exclusive residential development. It is not considered appropriate to rely on adjoining sites for any future provision of mixed use outside the applicant's control. Mixed use is a fundamental requirement in order to comply with the objectives on this site. This is supported by further area and site-specific objectives in the plan as follows The other 2 are contained within Chapter 10 of the CDP: Key Growth Areas and Neighbourhood Sites **Objective 10.100 which relates to all Neighbourhood development Sites –** Sites will benefit the neighbourhood and promote compact growth Developments will address the relevant points highlighted by the text and icons and relevant objectives in the plan– Neighbourhood Development Site 2 Sites 2 relates to the 1.5 ha site of which this site forms part. Specifically states mixed use	As above, the scheme has introduced a mixed use scheme which comprises of residential apartments with a café and office uses on the ground floor facing the Carrigaline Road. The scheme provides for large outdoor seating which contribute to an active area and will provide animation and footfall at the sites main entrance. As above.

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and sets out a no of recommended uses which are – residential, community facilities, local services, shops and public realm improvements. Therefore, there is scope within the policy objective for a wide range of uses and it's recognised that an important way forward is to identify particular non-residential uses that will work in this context. Policy is open to discussion on this. **Objective 10.82 'Douglas Sustainable Transport, Placemaking and Public Realm'** This objective speaks to optimisation of placemaking and contribution to multifunctional and inclusive public realm that assists in improving the attractiveness of Douglas. Section 10.321 under 'employment' also highlights Barry's Field as a local transformation site – opportunity to incorporate high quality mixed use - positive response to Carrigaline Road Church Street and Churchyard Lane. Having regard to objectives under 1,2,3 above the policy requirement in relation to this site for mixed use and contribution towards placemaking within the wider Douglas context is very strong and is recommended to be a focus of any revised scheme.	The provision of a new public and communal open space and pedestrian route through the site will enhance the public realm of Douglas town centre. On Carrigaline Road, the public realm will benefit from the new active frontage of Block 1, with own door offices and café at ground floor level. The proposed commercial uses will improve and enliven the public realm within the area and provides a positive response to Carrigaline Road.
Other Comments The site forms the majority landholding within the overall neighbourhood development site. A wider site strategy demonstrating how the layout considers and makes provision for suitable integration with adjoining sites would be necessary.	Refer to the submitted design statement and drawings by OMP Architects which provides the site strategy and outlines how the site makes the provision for suitable integration with adjoining sites. The setbacks from existing buildings and the retention of a significant number of trees as well as the existing boundary treatment to the west mean that the development can be integrated successfully into its context.

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	An appropriate distance is kept from the only adjoining residential property to the north. These measures all contribute to the good integration of the scheme within its existing setting, while preserving an appropriate density in this town centre location.
The Green Infrastructure and movement strategy to meet desire lines etc and optimise strong permeability, public realm opportunities and integration within the overall neighbourhood development site and its wider setting should be the basis upon which to inform any revised layout with demonstration of same.	The existing ditch, hedge and trees are retained along Churchyard Lane, with 2 new access points proposed to enhance permeability. The proposal will add vitality to Douglas Town Centre, promote town centre living, enhance permeability and promote footfall and activity.
It is considered appropriate to reserve comment on particulars of height density etc until a revised scheme is proposed which aligns more appropriately which the key policy objectives above and the comments of other subject matter experts. Aside from site specific objectives, regard should be had to the provisions of Objective 3.1 'Planning Sustainable Neighbourhoods' and height and density targets. Also, re the SRCSG's, I refer to Policy Objective 3.1 which requires a refinement of the proposed density based on local context, including the receiving historic environment. Any revised proposal should address same taking into account the comments of all subject matter experts including that of the conservation officer.	The proposal offers a range of unit types, from own-door duplexes to 1, 2 and 3 bed apartments, as well as office space and a retail/café space, framing generous public and communal open spaces. Proposed uses comply with the Development Plan zoning, and the proposed density is 156 units per hectare, around the midrange of the 50 to 250 dwellings per hectare recommended in Table 3.1 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities. It is to be noted that the Cork City Development Plan 2022-2028 set a population target increase of 13% by 2028 for the South-East Suburbs. The proposed height of up to five storeys is supported by the

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	location of the site, within close walking distance of all the amenities and employment opportunities available in Douglas Village and on significant existing and proposed public transport routes. The setbacks from existing buildings and the retention of a significant number of trees as well as the existing boundary treatment to the west mean that the development can be integrated successfully into its context. The provision of a new public open space and pedestrian route through the site will enhance the public realm of the village. The proposed development will bring variety and activity to the area. The surrounding buildings are largely commercial in nature, and the residential offering in the wider area is mainly larger family houses at a quite low density. The proposed scheme will bring additional footfall and activity to the neighbourhood and benefit the existing local retail and service businesses. The proposed heights respond to the existing context as follows: • Along Carrigaline Road, the proposed block is generally 2 storey with setback, with a small portion to the north rising to 3 storeys to mark • The main pedestrian entrance to the site and access to the public open space and east west pedestrian route. The proposed height reinforces the emerging 2 to 3 storeys datum along the road.

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	• To the west of the site, Block 2 is 4+1 storeys high, responding to the generous open expanse of the graveyard. The retained existing trees on site, as well as the trees within the graveyard, will ensure that the scheme is barely visible from this location. The central Block 1A is also generally 4+1 storey, with a setback along the majority of the elevation to Carrigaline Road, ensuring a gradual rise in proposed heights as seen from the east or the west. • To the south and north, the scheme presents as gables and lower rise elements, largely hidden from view by the retained existing trees. Refer to submitted drawings for further details.
Regarding dwelling mix, having regard to the relevant objectives in the plan Obj 3.6 Housing Mix and Obj 11.2 Dwelling Size Mix, the scale of the overall development which is relatively substantial and the location of this site in a highly accessible location in the heart of Douglas village, it is considered important to ensure an appropriate social mix that provides for a diverse range of ages and abilities, and ensures a balanced community within the scheme itself. The opportunity to provide for high quality age friendly housing is strong in a location such as this. The appropriateness of any deviation sought to housing mix as set out in Table 11.8 of the CDP would be assessed in relation to same and the overall responsiveness of the scheme to relevant policy objectives as outlined in the meeting.	The proposed unit mix has been altered from the submitted detail lodged at the pre-planning stage held on the 19th June 2024. The revised scheme has introduced a larger no. of 3 no. bed units range which have increased from 5 no. units to 11 no. units (which is 8.9% of the development). A dwelling mix report has been submitted with the S.32B request and LRD application. Within the report, the mix of units by number of bedrooms for the proposed development is contained in table 3 of the report. The proposed mix for 1-

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	and 2-bedroom units is larger than the targeted mix as per Table 11.8 of the CCDP 2022-2028. However, the proposed mix of 3- and 4-bedroom units is smaller than the targeted mix. Therefore, the proposed development will ensure that the share of 1- and 2- bedroom units in the catchment area will increase relative to the share of 3- and 4-bedroom units. Thereby, increasing the range of housing options in the catchment area through redressing the current uniform mix of dwellings by number of bedrooms in the catchment area.
Development Management The site is an important one with Douglas and this is reflected in its designation as a Neighbourhood Development Area and as a Local Transformation Site within the CDP. It is zoned ZO4 for mixed use, and it is also with the Douglas Donnybrook ACA We welcome the site coming forward for development and particularly as a majority residential scheme in this highly sustainable location. We have some concerns with how the scheme is responding to its zoning (being wholly residential in nature), how it will integrate with its surroundings and how it's scale and massing reflects its location in an ACA. As proposed it is considered that the scheme is quite inward looking, and this is exacerbated by the layout with the location of the surface car parking on the eastern edge facing the old Carrigaline road. We would encourage that the scheme be amended to actively address the old Carrigaline road frontage. The introduction of some live use along this frontage would animate this section of the road which at present is poor in terms of public realm and	Noted Comments as above – the scheme has been revised to comprise a mix of residential and commercial uses. The revised scheme has introduced own door active commercial units on Carrigaline Road which will benefit from the new active front from the block. The lower development block provides active front to Carrigaline Road. The revised scheme provides well overlooked public and communal realm.

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help to integrate the development with Douglas village and respond to the zoning objectives and specific requirements for the site as set out in the CDP. We appreciate that there was a lot of feedback given and would welcome further S247 meetings with the applicant once they have had an opportunity to consider the feedback given and also encourage offline meetings relating to technical/conservation matters as discussed in the meeting.	A further pre-planning meeting was held with the Council on the 14th August 2024 with Cork City Council with Eoin McElroy, Ashleigh Murray, Sharon McDonnell, Lucy Teehan and Gillian Tyrrell.
Conservation, Planning Policy **Initial Comments on Impact of the Proposed Development (Buildings)** The principle of development on this site is welcomed and it is recognised that this is an opportunity site. The relationship with the ACA is very important, particularly as this development site is uniquely located within the ACA. Any new buildings in this sensitive location need to ensure that there are no adverse impacts on the character of the ACA. ***Height/ Massing*** The proposals are 3-5 storeys, but the development would be predominately 5 storeys. While not all required views have been submitted, from the information that is available, it is considered that the development would be visually dominant from the surrounding area and would have a negative impact on the character of the ACA. At this stage, I'm not necessarily saying that the development has to be 2-3 storeys across the entire site, but the scale and massing of the proposed development, or any revised more integrated scheme, needs to successfully integrate with the receiving historic environment in terms of scale and massing, and this needs to be demonstrated in the views. ***Design*** While a contemporary design is not opposed and good quality materials appear to be proposed, the design approach does not	Noted Refer to the Architectural Heritage Impact Assessment and by John Cronin and Associates and 13 no. photomontage by Modelworks submitted with the S.32 request. The proposed development is of high architectural design quality and the applicant has successfully integrated the scheme into its urban and landscape setting. The submitted photomontages prepare by Modelworks confirm the site has the capacity to accommodate the development within a strong natural screen provided by the boundary trees and existing hedges. As consulted within the report, the proposed development *will not give rise to negative impacts* on the ACA. The impact on the ACA and protected structures within the vicinity of the development can be summarised as ***negligible*** as the proposals will only result in very slight changes to the visual character of the area of Douglas village. The scale, massing and

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appear to fully or appropriately respond to the existing character of the ACA. The design, materials and colour of the proposed development or any revised more integrated scheme should complement and be sympathetic to the character of the ACA. At this point, a full assessment of the impact on the surrounding area, including the setting of St Luke's Church and its graveyard, cannot be assessed without additional views.	proportions of the new buildings sit comfortably within the ACA. In terms of proposed materials, a restrained palette of quality durable materials is proposed. The primary cladding material is a textured grey brick, in two complementary tones, reminiscent in colour and texture of the existing stones walls around the site and referring to Douglas' brickmaking history. Its neutral tone, texture and natural variation will act as a quiet backdrop to the existing and proposed landscaping.
Boundaries The site is surrounded by a mixture of historic boundaries that represent the rural character of the area before the City expansion. The proposals appear to be retaining these boundaries, which is welcomed, and the provision of pedestrian access only along Churchyard Lane is considered appropriate.	Noted
Additional Information The supporting documents (namely the Design Statement and Architectural Heritage Impact Assessment) should include a full and detailed assessment of character of the ACA and a clear explanation of how the proposals would respect and respond to this in terms of massing, scale, design, materials and colour. Additional views are required: from both graveyards, additional views north and south along Carrigaline Road/ East Douglas Street, and further west along Church Street. A tree survey should be provided and a clear outline of retained and proposed trees/ foliage. The type of planting and retention of	Refer to the updated Design Statement from OMP Architects and Architectural Heritage Impact Assessment and by John Cronin and Associates. Refer to Photomontages by Modelworks. Refer to submitted tree survey and report by Heritage Tree Care Ltd

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foliage throughout the year will be of particular importance.	
City Architects The site is particularly exposed to the south and west overlooking the St. Lukes & St. Columba's church graveyards. The Douglas Telecom exchange is located directly to the south. Cork City Architects' Department (CCAD) acknowledge the sensitive nature of the existing context located within the Douglas ACA with specific Mixed-Use Development zoning as designated for the site.	Noted
Whilst acknowledging the above CCAD also view that the above concerns are also required to be balanced with the objectives of the Sustainable & Compact Settlements Guidelines and judged against the specific nuances of the site context.	Noted
Douglas Village has suffered from dispersed commercial developments over time most notably the array of large shopping centres and off-centre retail which have had a detrimental impact on the main west and east village streets. In our view the best approach for the Douglas area into the future will be to consolidate the existing east and west village centres with the Church St. east-west linkage playing a pivotal role.	Noted
Largely residential development is supported re. town centre living / proximity to service / transport – bringing life to the village centre etc. with mixed-uses where possible.	Noted
The site in question is set-back from Church St. with the western approach from Churchyard Lane particularly restricted in terms of width and pedestrian accessibility making any non-residential uses here potentially difficult. Therefore, we feel that proposed Residential use here is appropriate. Subject to further public realm	As outlined above, public realm improvements have been introduced within the revised scheme. While most of the existing ditch, hedge and trees are retained along Churchyard Lane, two new pedestrian connections are proposed: one as part of the northern east-

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improvements & pedestrian accessibility from Church Street which require further development as part of the proposals.	west pedestrian route, and one along the proposed boundary walk. These will facilitate pedestrian access to the bus routes on West Douglas Street and Church Street.
Carrigaline Rd. is currently a distributor road but could benefit with public realm improvements where fronted by the site given its proximity to the 'Barry's corner and east village junction. The area to the east of the site could also accommodate some mixed uses which should be explored / further developed. In relation how the proposals address / front onto Carrigaline Rd. is also required to be addressed.	As noted above.
Proposed building heights are at the upper limits given the context sensitivities. Stronger justification via additional 3D visualisations is required from both graveyards to the west and south. Further consideration should be given to modifications of heights / design re. approach views / impacts from Carrigaline Rd. Upper-level setback's and / or reduction in heights should be further explored.	Additional photomontages have been provided as required by the Council. Along the Carrigaline Road, the proposed Block is generally 2 storey with setback, with a small portion to the north rising to 3 storeys to mark the main pedestrian entrance to the site and access to the public open space and east west pedestrian route. The proposed height reinforces the emerging 2 to 3 storeys datum along the road.
East West permeability through the site should be further developed. The proposed potential public route to the north of the site via bin stores etc. is not so attractive. Options to stagger blocks and allow a semi-public through route rather than gated entrances should be explored.	The eastern end of the proposed new east-west pedestrian route through the site is clearly marked by the location of the café with its large windows and outdoor seating along Carrigaline Road.
Trees – full Landscape and Horticulturalist input required as to which mature trees are to be retained including methodology during construction / protection of roots etc. The projected lifespan of the trees to be maintained should also be clarified where possible.	Refer to Arborist report by Heritage Tree Care Ltd.

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CCAD are supportive of the proposed design which deploys a simple architectural language with a restrained palette of materials. Options for recessed upper storey terraces may help mitigate concerns around height and visual impact in conjunction with potential upper-level setbacks particularly towards the south (views from graveyards and approach from Carrigaline Rd). The proposed pale colour brick against back-drop of trees / context also feels appropriate / acceptable. A limited palette of materials to allow the Architecture to be relatively quiet is also appropriate given the context. Brick is also supported re. quality finish, future weathering and durable character.	Refer to Architectural Details. Noted
<u>Transport, Planning Policy</u> A reduced provision of parking is supported; however, the final permitted number of parking spaces requires a greater justification along with a car park management plan/mobility management plan The provision of surface parking is not supported within the site, as the development needs to ensure a high-quality public realm is delivered to support its town centre location. The vehicular access from Churchyard Lane is not supported, with vehicular access from Old Carrigaline Road acceptable. The proposed change to parking provision on Old Carrigaline Road should be presented The number and location of pedestrian access points onto Churchyard Lane should respect the existing nature of the street in particular the existing hedgerow and trees. The provision of traffic calming measures on Churchyard Lane to promote safe pedestrian access is recommended.	A MMP has been prepared and submitted by MHL and Associates. The level of parking will ensure that the resident of the facility adopt sustainable commuting choices, in accordance with local and national standards and guidelines. The location of the site, in close proximity to relevant services means that this provision is appropriate for the scale of development. The proposed parking has been amended to be located within the site, refer to updated drawings. The vehicular access from Church Yard Lane has been omitted and only provides access via Carrigaline Road The location of pedestrian access points from Church yard Lane has been reviewed.

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• Urban Roads and Street Design, Planning Development Management • Given the proposed residential development is in close proximity to Douglas Village and is noted by applicant and CCC as an accessible site well served by public transport, it is imperative that the applicant enhances the pedestrian connectivity from the site to Douglas both via the Old Carrigaline Road and Church Yard Lane. To this end, the applicant is required to provide as part of their development public realm improvements to enhance pedestrian connectivity and attractiveness at the Old Carrigaline Road/East Douglas Junction and also introduce pedestrian connectivity/ crossing/ shared space works at the Church Yard Lane/Church Street junction. Furthermore, the proposed vehicular access/egress at Church Yard Lane is not agreeable as per CCC team comments	West to east pedestrian connectivity is provided and public realm improvements have been introduced within the revised scheme as outlined above. The proposed network of pedestrian paths will provide access to Church Lane and Carrigaline Road, provide access to public open spaces and provides circulation to amenity spaces within the curtilage of the apartment blocks.
Roads Asset Management & Maintenance • I would not be in favour of the vehicular access proposed at the Churchyard Lane side. Pedestrian access at churchyard lane is fine, but provisions will have to be provided for safe crossing of pedestrians and visibility of pedestrians at this intersection. • The proposed entrance to the development for vehicles from Carrigaline road, will in my opinion require the removal of on street parking (to achieve sightlines), if so, please provide details and provide solutions to this loss of parking.	This vehicular access has been omitted and only provides pedestrian access. Updated entrance details have been provided which will require the removal of a number of parking spaces to ensure visibility requirements can be achieved.
Traffic Regulation & Safety • Bicycle Parking – 259 proposed bicycle parking spaces – the number of spaces is fine but they have to be covered and secured in line with development plan and sustainable urban housing	Drawings updated to ensure the majority of bike spaces are covered and secured

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document– designs to be shown to traffic section	
• Car Parking – 33 spaces proposed – it's well within the development guideline threshold so no issues there – Need to see the addition of Electric Vehicle parking, disabled bays and motorbike parking in line with development plan standards. It is predicted to have over 300 residents on the site – a clear plan of how parking overspill for the development will be managed The submission of a mobility management plan	Refer to submitted Energy Statement by MBA – as per TGD L 2022, Ducting Infrastructure will be provided for every parking space in this development to enable the subsequent installation of recharging points for electric vehicles. This will promote sustainable transport. A Mobility Management Plan has been prepared by MHL and Associates
The proposed entrance on the Old Carrigaline Road would require the removal of parking bays and taxi rank – what is the plan for this? How many bays affected? Swept path analysis required for the parking areas	The proposed entrance will result in a loss of 5 on-street car spaces, to facilitate adequate sightlines for the development, refer to the proposed sightline layout by DOSA Engineers. Refer to Drawing No. 0013 from DOSA Engineering which provides swept path analysis.
• Vehicular Access – I would question the need for two vehicular entrances into the development – I would suggest the removal of entrance on Churchyard Lane – poor connectivity, unnecessary, emergency access	As above, the scheme proposed only 1 no. vehicular access via Carrigaline Rd.
• Construction Traffic – the access roads into the development are quite narrow and would struggle to support some larger works vehicles – a construction traffic management plan would be required	A CTMP has been provided by DOSA Consulting Engineers
• Road Markings and Signage – any changes to road markings and	Noted

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signage on public roads to be agreed with Cork City Council • Public Lighting – Any changes to Public Lighting to be agreed with ITS Section of Cork City Council **Infrastructure Development** • Spoke briefly re Bus Connects Cork. • Referred to the bus network and the proposed infrastructure measures on the Sustainable Transport Corridors (STC's) • Church Street and East Douglas Street will have a significant number of buses on them. The roll out of the new bus network across the City is due to commence in 2025. It will be a phased delivery over 18+ months.	Noted Noted
Biodiversity Officer, Parks & Recreation Reports to be included: • AA screening and if needed an NIS • EcIA – Ecological Impact Assessment, to include a bat survey. • Include an Invasive plant species survey within the EcIA. Japanese knotweed is on site. • A full Tree survey to the British standard. BS5837. • What is the percentage of green open space • Percentage of trees to be removed and the number of new trees to be planted. • Lighting to be bat sensitive and follow the guidelines set out by the Bat Conservation Ireland, BCT, 2023.	Requested Reports included within 32B and planning application submission.
Drainage **<u>Wastewater</u>**	

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We note that the Applicant has made a Pre-Connection Enquiry to Uisce Éireann. As this in an LRD application, the Applicant will need to engage further with UÉ prior to submitting the planning application. The Applicant will need to submit full and final designs to UÉ for review and approval. Once UÉ are satisfied with the design, they will issue a Statement of Design Acceptance. A copy of this statement along with the full design will be required to be submitted with the Planning Application.	Noted, a COF has been submitted with the S.32B submission and LRD application.
Storm Water The Infrastructure Report states that there is an existing storm sewer approx. 60m north of the site. We have no records of this sewer. Appendix A of the report includes existing service layout drawings and no details of the storm sewer are included. Further information or investigations of the existing storm sewer will be required. In accordance with the Cork City Development Plan 2022-2028, proposals should integrate green and blue infrastructure measures to offset peak flood flows. This includes the incorporation of SUDS, with a particular focus on Nature-Based Solutions, to limit run-off from existing and new development. Any application should include: • A clear drainage strategy for the site, detailed in an engineering or infrastructure report. • Detail how surface water will be managed on site to limit discharge for the 1-in-100-year (1%AEP) rainfall event with 20% allowance for climate change. This shall include drawings and calculations. • The permitted discharge rate will depend on the discharge location i.e. storm sewer / combined sewer / river. Assuming that there is an existing storm sewer with no capacity issues, the permitted	DOSA carried out several site investigations and their findings have been incorporated to deal with solutions to SW drainage, Foul Drainage and Water Supply. Refer to updated report for further details.

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discharge rate would be the equivalent greenfield runoff rate, or 2l/sec/ha (whichever is greater) for the effective drained area within the site (i.e. the developed area) and not the total site area. • In relation to attenuation tanks, it should be noted that within the Strategic Flood Risk Assessment included as an Appendix to the City Development Plan, Section 3.5 deals with Sustainable Drainage Systems. Section 3.5 outlines a hierarchy of SUDS features, and states that Attenuation Tanks are only to be used in exceptional cases, at the discretion of the Council and will only be considered as a last resort. • The Application should clearly state if it is intended for the development to be taken in charge and include a TIC drawing. • If the development is to be taken in charge, and attenuation tanks are permitted, all tanks shall be concrete. • Permeable paving is not permitted in public areas to be taken in charge.	Refer to Section 2.4 of Infrastructure Report. The capacity of the attenuation tanks is designed to cater for the capacity required for a 1 in 100-year ARI event. There will be no taken in charge areas, it will be the responsibility of the management company.
Archaeology • I have reviewed the documentation submitted and am in agreement with the conclusion outlined in the letter Avril Purcell, Lane Purcell Archaeology. • There are no archaeological requirements.	Noted