Statement in Accordance with 299B(1) (b) (ii) (II) and article 299B(1) (c) of the Planning and Development Regulations 2001-2024

For a Large Scale Residential Development at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork

on behalf of Barry's Field Ltd.

January 2025



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1 Introduction

This Statement has been prepared by McCutcheon Halley Planning Consultants in accordance with 299B(1) (b) (ii) (II) and article 299B(1) (c) of the Planning and Development Regulations 2001 (as amended), on behalf of Barry's Field Ltd to accompany a Large-scale Residential Development (LRD) application to Cork City Council consisting of the development of 124 no. residential units, cafe and two office units and all associated developments works at Barry's Field, Carrigaline Road and Churchyard Lane, Douglas, Cork.

This statement is submitted on behalf of the Barry's Field Ltd. to Cork City Council to assist in understanding the nature and purpose of the proposed development, as well as its potential environmental impacts, in compliance with EU legislation other than the Environmental Impact Assessment Directive.

This statement should be considered alongside the accompanying reports submitted with this LRD application. These reports have been prepared by consultants with extensive expertise in the Environmental Impact Assessment Directive and include the following:

- Screening for Environmental Impact Assessment (EIA) Report prepared by McCutcheon Halley Chartered Planning Consultants;
- Screening for Appropriate Assessment (AA) Report prepared by Limosa Environmental;
- Ecological Impact Assessment (EcIA) Report prepared by Limosa Environmental;
- Flood Risk Assessment (FRA) Report prepared by ARUP;
- Traffic and Transport Assessment (TTA) Report prepared by MHL & Associates;
- Noise Assessment Report prepared by CLV Consulting;
- Landscape and Visual Impact Assessment Report prepared by Cunnane Stratton Reynolds.

2 Project Description

The proposed development comprises 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 on-street car parking spaces.



Figure 1 Proposed Site Layout prepared by OMP

The proposed development includes a range of accessible and usable public open spaces, designed with passive surveillance and supported by a landscape masterplan prepared by Cunnane Stratton Reynolds (CSR). The site will feature public open space and communal open space, with efforts to retain existing trees and walls, particularly along the southern and western boundaries. The details of the retained trees are outlined in the Landscape Masterplan prepared by CSR, along with the Tree Constraints and Tree Protection Plan prepared by Heritage Tree Care which provides a detailed illustration of the retained vegetation.

The buildings will be set back approximately 11m from existing residential properties on Carrigaline Road and a minimum of 18m from the single-storey house on Church Street. The development will provide 789.7m² of communal open space (exceeding the required 746m²) and 1,444.9m² of public open space.

The proposed development will include site and infrastructural works such as water services, foul and surface water drainage connections, and attenuation measures. Additional provisions include permeable paving, landscaping, fencing, internal roads and footpaths, waste storage areas, electrical services, and all other associated site development works.

The proposed development has been designed to accommodate potential future development to the north of the site. This could include a retail/apartment development on Church Street, enhancing the existing retail and commercial frontage. The proposal aligns with the site's Development Plan zoning, which designates the area for mixed-use development.

The proposed development will assist the current housing need in Cork City Council by providing additional residential units in the Douglas area. The design strikes a balance between achieving increased density and maintaining consideration for the Architectural Heritage designation, and the existing residential and neighbouring amenities in the surrounding area.

3 Planning Policy

The proposed LRD is a sub-threshold Environmental Impact Assessment (EIA) development as it consists of 124 no. apartment units which is below the 500 dwelling mandatory EIA threshold specified in Paragraph (1)(b)(i) of Part 2 of Schedule 5 of the Planning Regulations 2001 (as amended).

Articles 299B and 299C of the Planning Regulations prescribe the requirements for sub threshold development where no screening determination was made under Section 7 of the Planning and Development Act 2016.

In cases where an application for sub threshold development is not accompanied by an Environmental Impact Assessment Report (EIAR), but where there is 'significant and realistic doubt in regard to the likelihood of significant effects on the environment arriving from the proposed development', Article 299B(1)(b)(ii)(II) of the 2001 Planning Regulations requires that the Council must satisfy itself that the applicant has provided the following:

(a) The information specified in Schedule 7A,
(b) Any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, and
(c) A statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to European Union legislation other than the Environmental Impact Assessment Directive have been taken into account.

Article 299B(1)(c) of the 2001 Planning Regulations indicate that:

> *The information referred to in paragraph (b)(ii)(II) may be accompanied by a description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment of the development.*

The information required by sub-paragraphs (a) and (b) of Article 299B(1)(b)(ii)(II), namely, the information specified in Schedule 7A and any further relevant information on the characteristics of the proposed development and its likely significant effects on the environment, is contained in the Environmental Impact Assessment Screening report prepared by McCutcheon Halley Planning Consultants which forms part of this LRD application.

The information required by sub-paragraphs (c) of article 299B(1)(b)(ii)(II) namely, a statement indicating how the available results of other relevant assessments of the effects on the environment carried out pursuant to

European Union legislation other than the Environmental Impact Assessment Directive have been taken into account is contained in this standalone statement.

All of this information is provided by the applicant so that the Local Authority (Cork City Council) may complete an examination for the purposes of a screening determination in accordance with Articles 299B and 299C of the 2001 Planning Regulations.

4 Statement on Environmental Assessment

As the nature of the development is residential, the following EU Directives have been considered in the statement:

- Directive 92/43/EEC (Habitats Directive) and Directive 2009/147/EC (Birds Directive);
- Directive 2014/52/EU (Environmental Impact Assessment - EIA Directive);
- Directive 2007/60/EC (Floods Directive);
- Directive 2002/49/EC (Environmental Noise Directive);
- Directive 2000/60/EC (Water Framework Directive);

4.1 Directive 92/43/EEC (Habitats Directive) and Directive 2009/147/EC (Birds Directive)

Both directives serve as the cornerstone of the EU's nature conservation policy, aiming to protect natural habitats and wild species across Europe.

The Habitats Directive (92/43/EEC) aims to conserve natural habitats and wild fauna and flora through the designation of Special Areas of Conservation (SACs). Similarly, the Birds Directive (2009/147/EC) focuses on the protection of bird species of special importance by designating Special Protection Areas (SPAs). Each member state is responsible for designating SACs and SPAs, which together form Natura 2000, a network of protected sites across the European Union.

4.1.1 Appropriate Assessment Screening

An AA Screening Report has been prepared by Limosa Environmental, identifying a total of 2 Natura 2000 sites within the zone of potential impact of the proposed development. The identified sites include:

- Cork Harbour SPA (Site Code 004030)
- Great Island Channel SAC (Site Code 001058)

This screening ensures the proposed development complies with the requirements of the Habitats Directive by assessing potential impacts on designated SACs and SPAs. The AA Screening Report concludes that the proposed works will have no significant negative impacts upon Cork Harbour SPA and Great Island Channel SAC.

4.1.2 Bat Assessment

Karen Banks of Greenleaf Ecology carried out a Bat Survey as part of this LRD application and prepared a report based on the survey findings.

The bat species identified on-site at Barry's Field during the survey include:

- Common Pipistrelle (Pipistrellus pipistrellus);
- Soprano Pipistrelle (Pipistrellus pygmaeus);
- Leisler's Bat (Nyctalus leisleri).

These species were recorded during both active and passive monitoring conducted in August and September 2024.

During the construction phase, the proposed development may result in the loss of limited roosting features, such as ivy growth and shallow knot holes in trees, due to essential tree felling for access or safety reasons. Additionally, the clearance of grassland, although of low suitability for foraging, could impact commuting and foraging routes. The retention of boundary treelines will mitigate some of these effects. Temporary construction lighting, particularly during nighttime activities, may disturb bats, potentially leading to avoidance of commuting and feeding areas.

In the operational phase, increased lighting from street and domestic sources may create barriers to bat movement and reduce the availability of foraging habitat. This could affect bat species that rely on dark corridors, such as treelines and hedgerows, for commuting and feeding. Without appropriate measures, the impacts on bats during operation could have long-term adverse effects at the local scale.

To minimise impacts during the construction phase, tree retention will be prioritized, with tree felling limited to essential removals. Any trees removed will be replaced on at least a one-to-one basis. Construction lighting will be managed by avoiding nighttime activities during the bat active season (April to September) and reducing artificial lighting in sensitive areas to prevent disturbance.

For the operational phase, lighting design will play a critical role in minimizing impacts on bats. Light spill onto sensitive areas, such as treelines and foraging habitats, will be minimised using low level lighting, shields, baffles, and directional lighting. Dark buffer zones will be retained to protect commuting and foraging areas, and sensitive planting will encourage insects that support bat foraging.

By implementing these mitigation measures, the development will retain key commuting corridors and minimise light intrusion into bat habitats. As a result, the residual impacts on bats are expected to be minor and localized.

4.1.3 Ecological Impact Assessment

An Ecological Impact Assessment (EcIA) has been prepared by Limosa Environmental which notes that the natural environment at the project site includes habitats of varying ecological value. The most notable habitats identified are dry meadows, grassy verges, hedges, scrub and mature treelines.

The proposed development will result in some habitat loss, including areas of dry meadows and grassy verges, which currently support various plant species. While efforts will be made to retain mature treelines and hedgerows along the site boundaries, some sections of these habitats, along with areas of scrub, may be affected (e.g. the eastern hedgerow is being removed at the request of the City Council). The Arboricultural Impact Assessment provides detailed mitigation measures and tree protection measures to protect the retained trees during the construction phase. Given full adherence to these plans and protection measures should result in no determinable impacts to retained trees (i.e. imperceptible impact).

An additional ecological concern is the presence of Japanese Knotweed, an invasive species recorded on the site. A site survey was also carried out by O'Donovan Agri Group who detailed the findings regarding the invasive species and the recommended management of the Japanese Knotweed. A more detailed assessment can be found below in Section 4.1.4 on Japanese Knotweed.

To address these impacts, several mitigation measures have been proposed. Key habitats such as mature treelines, hedgerows, and other ecologically valuable features will be retained wherever possible, and the layout of the development will minimise habitat loss.

The design of the development will incorporate wildlife-friendly features to promote biodiversity. Measures such as installing nesting boxes for house sparrows and planting native species will support local fauna and contribute to biodiversity net gain. Lighting strategies will be carefully designed to reduce light spill into sensitive habitats, using bat-friendly options like warm-spectrum LEDs and directional lighting.

During the construction phase, best practices will be followed to limit noise and activity during sensitive periods for wildlife, such as breeding seasons. Buffer zones will be established around key habitats to minimise disturbances. Post-construction, ecological monitoring will be conducted to evaluate the effectiveness of these measures, and landscaping will be managed to maintain habitat connectivity with surrounding green spaces.

By implementing these mitigation strategies, the ecological impacts of the development can be minimised, and opportunities for biodiversity enhancement can be realized

4.1.4 Japanese Knotweed

A walkover survey conducted in October 2024 identified two infestations of Japanese Knotweed (JKW) on or near the development site. Both infestations are mature and have not been subjected to recent chemical treatment.

To address the identified infestations, a detailed management plan has been prepared. The key mitigation and management measures outline in the report include:

- Herbicide Treatment: A pre-recovery phase herbicide treatment using a systemic, non-selective herbicide to reduce plant viability.

- Excavation and Recovery: Due to construction timelines, a full excavation of the infestations will be undertaken. The rhizomes and contaminated soil will be recovered and temporarily stored in a constructed bund on-site or transported to a licensed receiving facility. The excavation will be closely monitored by invasive species specialists to ensure thorough removal.
- Biosecurity Measures: Strict biosecurity protocols will be implemented during the recovery process to prevent the spread of knotweed.
- Bund Construction: A dedicated bund will be constructed on-site to securely store contaminated materials temporarily. The bund will be lined with a specialized C3 liner to prevent rhizome spread and will have the capacity to accommodate the expected volume of material, with additional space for potential overflows.
- Long-Term Monitoring: Regular monitoring of the site post-recovery will ensure no regrowth occurs. Any outliers will be incorporated into an ongoing management program to prevent re-infestation.
- Protective Measures for New Construction: Where construction overlaps with the current JKW 001 footprint, the use of a C3 liner beneath the foundations is recommended to provide additional protection against any undetected rhizomes.

These measures are designed to eliminate the current infestations and minimise the risk of future spread, ensuring compliance with environmental legislation and safeguarding the development site and surrounding areas. The management plan will remain a live document and will be updated as works progress and new findings emerge.

4.2 Directive 2014/52/EU, EIA Directive

The Environmental Impact Assessment (EIA) requirements originate from Council Directive 85/337/EEC, which was subsequently amended by Directives 97/11/EC, 2003/35/EC, and 2009/31/EC. These directives were later codified and replaced by Directive 2011/92/EU of the European Parliament and Council, which governs the assessment of the environmental effects of certain public and private projects. The EIA Directive was further updated through Directive 2014/52/EU, which introduced amendments to Directive 2011/92/EU. Together, these directives establish the framework for assessing and mitigating the environmental impacts of development projects.

The EIA Directive mandates that an environmental assessment must be conducted before development consent is granted for projects likely to have significant environmental impacts.

As detailed in the Screening for EIA Report prepared by McCutcheon Halley Planning Consultants, the size and design of the proposed development do not meet the thresholds for a mandatory Environmental Impact Assessment (EIA) under the Planning and Development Regulations 2001 (as amended). The proposed site covers approximately 1.04Ha and includes 124 no.

residential units, café and 2 no. office units, which fall outside the criteria specified in Schedule 5 of the Planning and Development Regulations 2001 (as amended). Therefore, an EIA is not a mandatory requirement for this project.

Mandatory	Screening Assessment	Mandatory Criteria Met (Y/N)
Part 2 of Schedule 5 (10)(b)(i) Construction of more than 500 dwelling units	The proposed development does not exceed the specified thresholds.	No
Part 2 (10) (b) (iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.	The proposed development does not exceed the specified thresholds.	No

Table 1 Summary of the Mandatory Legislative Requirements for Environmental Impact Assessment Impact

Therefore, it can be concluded that the proposed development is below sub-threshold.

The proposed development has also been assessed in accordance with the criteria specified in Annex III of the EIA Directive 2011/92/EU (as amended by 2014/52/EU) to determine whether it is likely to have significant effects on the environment. Taking into account the characteristics of the proposal, including its size, nature, location, and the nature of potential impacts, it is concluded that the development would not introduce any new or additional effects of a significant or adverse nature. Consequently, it is determined that the proposed development is not likely to have a significant environmental impact and does not warrant an Environmental Impact Assessment (EIA).

4.2.1 Directive 2007/60/EC, Floods Directive

Directive 2007/60/EC on the assessment and management of flood risks, commonly referred to as the Floods Directive, came into force on 26 November 2007. It requires EU Member States to:

- Assess whether all watercourses and coastlines are at risk of flooding;
- Map flood extents, identifying the assets and human populations at risk in these areas;
- Implement adequate and coordinated measures to reduce flood risks effectively.

In Ireland, the Floods Directive has been transposed into national law through Statutory Instrument No. 122 of 2010, with subsequent amendments made under Statutory Instrument No. 495 of 2015. These Regulations provide the framework for flood risk assessment and management in line with the Directive's objectives.

The Flood Risk Assessment (FRA) prepared by Arup confirms that the proposed development at Barry's Field lies within the defended area of the Douglas Flood Relief Scheme (FRS), which protects against Q100 flood events

with an additional 0.5m freeboard. The site is at low risk of tidal, pluvial, and groundwater flooding, while residual risks from extreme events and climate change are mitigated through elevated finished floor levels (FFLs) and a compliant drainage system.

The development, classified as Flood Zone A, underwent a Justification Test, confirming it meets all flood management criteria. There is no increased flood risk to surrounding areas, and access routes will remain secure during extreme events. All risks are effectively managed to comply with planning guidelines.

4.2.2 Directive 2002/49/EC, Environmental Noise Directive

Directive 2002/49/EC is the EU legislative framework for assessing and managing environmental noise, which was adopted on 25 June 2002 and came into force on 18 July 2002. The directive establishes a common approach to avoid, prevent, or reduce the harmful effects of environmental noise, particularly noise-related health impacts and annoyance.

The Directive has two primary objectives:

1. Article 1(1): To create a unified European strategy for avoiding, preventing, or reducing the harmful health effects of environmental noise, including annoyance.
2. Article 1(2): To provide a foundation for developing EU-wide measures aimed at reducing noise from major sources, such as road and rail vehicles, infrastructure, aircraft, outdoor industrial equipment, and mobile machinery.

In Ireland, the directive was transposed into national law through the Environmental Noise Regulations 2006 (S.I. No. 140/2006). These regulations implement the directive's requirements for noise management and control.

CLV Consulting carried out a noise and vibration impact assessment and prepared a report based on their findings which accompanies this planning application. The findings note that during the construction phase, noise levels at the nearest residential receptors are expected to reach 65-77 dB LAeq,T, causing slight to significant impacts when works occur nearby. However, as construction progresses and buildings are completed, they will provide shielding, reducing noise impacts. Vibration from excavation and lorry movements is anticipated to be minimal.

In the operational phase, noise from building services, such as heat pumps and ventilation systems, will remain within acceptable limits (≤50 dB LAeq,T for residential receptors). Café noise emissions are predicted to be negligible, as are noise impacts from car parking and additional traffic.

The cumulative noise impact from all operational sources will remain below established thresholds and the existing ambient noise levels. This ensures no significant adverse impacts on nearby sensitive receptors.

To minimize construction noise, low-noise equipment will be used, and activities will be restricted to daytime hours. A 2.4m noise barrier will be

installed around the site, and clear communication with local residents will be maintained. Continuous noise monitoring will help manage impacts.

For the operational phase, heat pumps and ventilation systems will meet strict noise criteria (≤60 dB LAeq for heat pumps and ≤45 dB LAeq for fans).

External amenity areas will be shielded from noise by the building layout. For balconies facing high-noise areas, imperforate balustrades will provide additional protection. These measures ensure noise impacts are minimized for both current and future residents.

4.2.3 Directive 2000/60/EC, Water Framework Directive

The EU Water Framework Directive (2000/60/EC) mandates Member States to protect and enhance the quality of all waters, including rivers, lakes, groundwater, and transitional coastal waters, to achieve good ecological status by 2015 or, at the latest, by 2027. In Ireland, it was transposed into law through the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003). The Directive emphasizes river basin-based management plans and provides a structured approach for their development.

An AA Screening Report has, identified a total of 2 no. Natura 2000 sites within the zone of potential impact of the proposed development. The identified sites include:

- Cork Harbour SPA (Site Code 004030)
- Great Island Channel SAC (Site Code 001058)

The screening ensures the proposed development complies with the requirements of the Habitats Directive by assessing potential impacts on designated SACs and SPAs.

DOSA Engineers have prepared a report titled 'Drainage Impact Assessment' to accompany the planning application, which demonstrates how the proposed development addresses potential environmental impacts related to water management and quality. The Surface Water Management Strategy uses a Sustainable Urban Drainage Systems (SuDS) approach to manage runoff from hard surfaces, ensuring discharge rates remain at greenfield levels via attenuation tanks and flow control devices. Water quality will be enhanced through features like fuel/oil separators, bio-retention systems, and filter drains, which treat pollutants before discharge. The system is designed to handle a 100-year storm event with a 20% climate change allowance, mitigating downstream flood risks. Existing ditches, trees, and hedgerows will be preserved where possible to further reduce runoff and improve water quality.

SuDS components, including filter drains, bio-retention systems, and attenuation tanks, will manage and treat runoff while controlling outflows. Hydrobrakes and petrol interceptors will regulate discharge rates and capture pollutants. A maintenance plan will ensure regular inspection and cleaning of these systems to sustain functionality, water quality, and flood prevention.

The AA Screening Report concludes that the proposed works will have no significant negative impacts upon Cork Harbour SPA and Great Island Channel SAC.

The approach adheres to relevant EU and national directives, including the Water Framework Directive (2000/60/EC) and flood management guidelines.

4.2.4 Directive 2008/50/EC, Clean Air for Europe Directive

The Clean Air for Europe (CAFE) Directive establishes objectives for ambient air quality to avoid, prevent, or reduce harmful effects on human health and the environment. It provides measures for assessing air quality in Member States and obtaining relevant data to combat air pollution and related nuisances. The Directive also promotes increased cooperation between Member States to address air pollution collectively. In Ireland, the CAFE Directive was transposed into national law through the National Air Quality Standards Regulations (S.I. No. 180 of 2011).

The Construction Environmental Management Plan (CEMP) prepared by DOSA Consulting Engineers includes Section 7, which addresses Air Quality Management. It specifies that the final contractor's CEMP will incorporate the full range of air quality mitigation measures outlined in the Noise Impact Assessment (NIA) and Ecology Reports. These measures aim to minimize the generation and impact of dust during construction activities.

Mitigation measures include spraying exposed earthworks and haul roads during dry weather to suppress dust and limiting stockpiling of materials to immediate requirements. Excavated materials will be removed promptly to reduce the potential for windblown dust, and street sweepers will be employed to keep the adjacent R474 free of dust. Additional measures include the installation of wheel washing facilities and the covering of stockpiles to prevent dust dispersion.

Vehicle speeds on-site will be restricted to 10 km/hr, and vehicle access will be controlled. The extent of active working areas will be minimized, and the site perimeter will be enclosed with netting and hard-surface hoarding to reduce dust emissions at low levels. Daily inspections will be conducted to identify potential dust sources and ensure timely implementation of appropriate mitigation measures.

Dust will be controlled at the source as this is the most effective strategy. With these measures in place, it is not expected that dust will have a significant impact on local human or ecological receptors. In the event of complaints from the public regarding dust, these will be logged, and additional actions will be taken to mitigate the issue effectively.

5 Conclusion

This statement outlines how the available results from relevant environmental assessments, conducted in accordance with European Union legislation other than the Environmental Impact Assessment Directive have been considered for the proposed LRD application. It also reinforces that the proposed development does not require an Environmental Impact Assessment (EIA). This statement should be read in conjunction with the submitted Environmental Impact Assessment (EIA) Screening Report as part of this application.