hw planning

Response to LRD Opinion

Proposed Large-scale Residential Development at ‘The Farm’, Bessborough, Ballinure, Blackrock, Cork

Client: Estuary View Enterprises 2020 Limited

December 2025

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Introduction

This report has been prepared in accordance with Section 32(D) of the Planning and Development Act, 2000 (as amended), and provides a response to the opinion issued by Cork City Council on the 26th of November 2025 (Ref. No: LRD25-10) which indicated that the documents submitted with the request to enter into consultations required further consideration and amendment to constitute a reasonable basis for an application for permission for the proposed LRD.

1.1 Site Location and Context

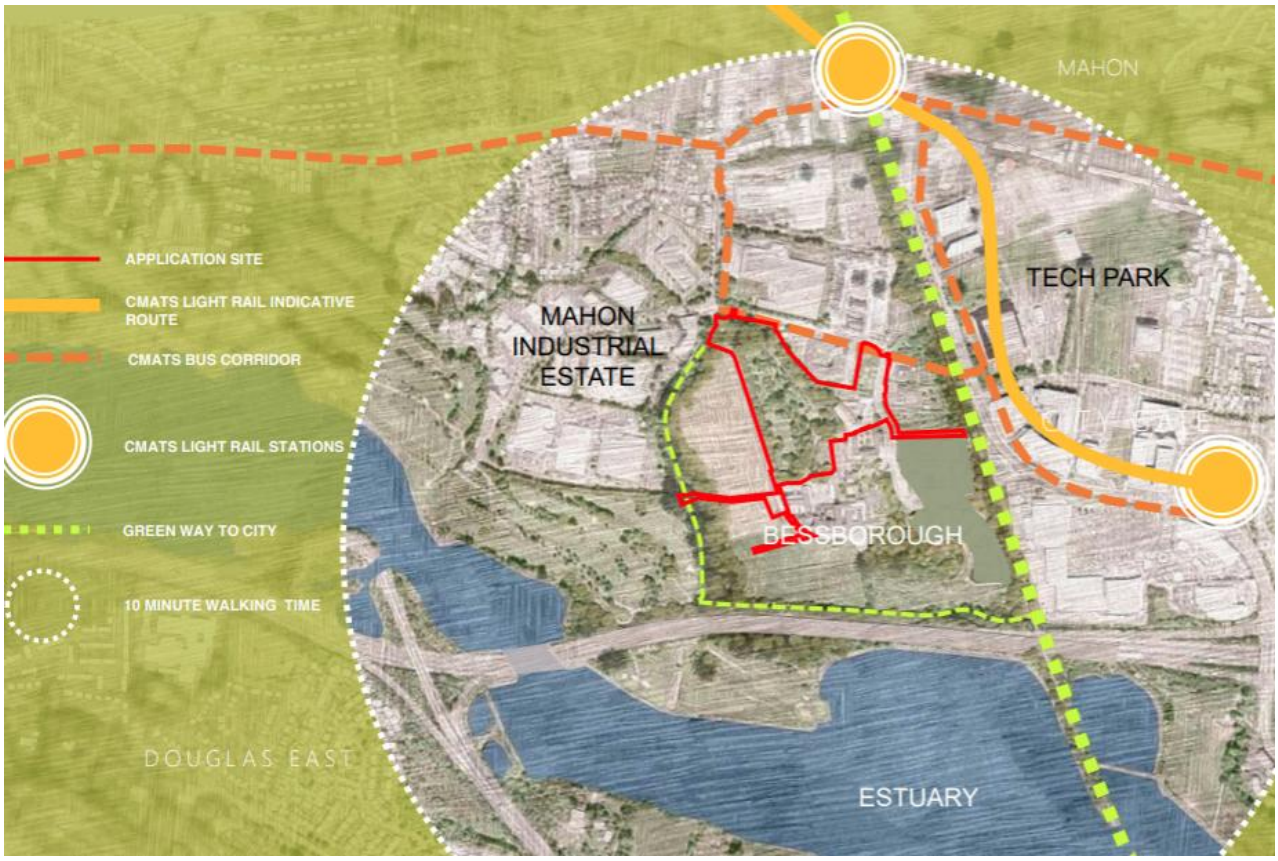


Figure 1.1. Site Context

The subject site, which is approximately 5 hectares in area, is located adjacent to Mahon District Centre, within the South-eastern Suburbs of Cork City, as defined in the Cork City Development Plan 2022-2028. The site is strategically located beside the Passage West Greenway which extends along three sides of Bessboro Estate and benefits from excellent walking and cycling links to the adjacent Mahon District Centre, and key strategic employment areas to the north, east and west. These are among Cork's strongest performing areas in terms of employment growth recently, presenting sustainable and viable employment opportunities for existing and future residents of the area.

It is an area earmarked for considerable growth and investment in the coming years having regard to the Cork Metropolitan Area Transport Strategy (CMATS), Cork BusConnects proposals, and the South East Sustainable Transport Corridors Scheme, which includes routes in proximity to the subject lands, serving Jacob's Island and Mahon. In addition, the Preferred Route of the high frequency Cork Luas includes stations in the vicinity of the subject lands.

The development opportunities presented by the 'Mahon Peninsula' have been recognised in successive Cork City Development Plans since 1998 and the current Cork City Development Plan 2022 continues to recognise Mahon as a 'Key Growth Area'.

The Core Strategy identifies Mahon as an area for growth consolidation and enhancement by providing a mix of new neighbourhood uses in suitable and underutilised locations.

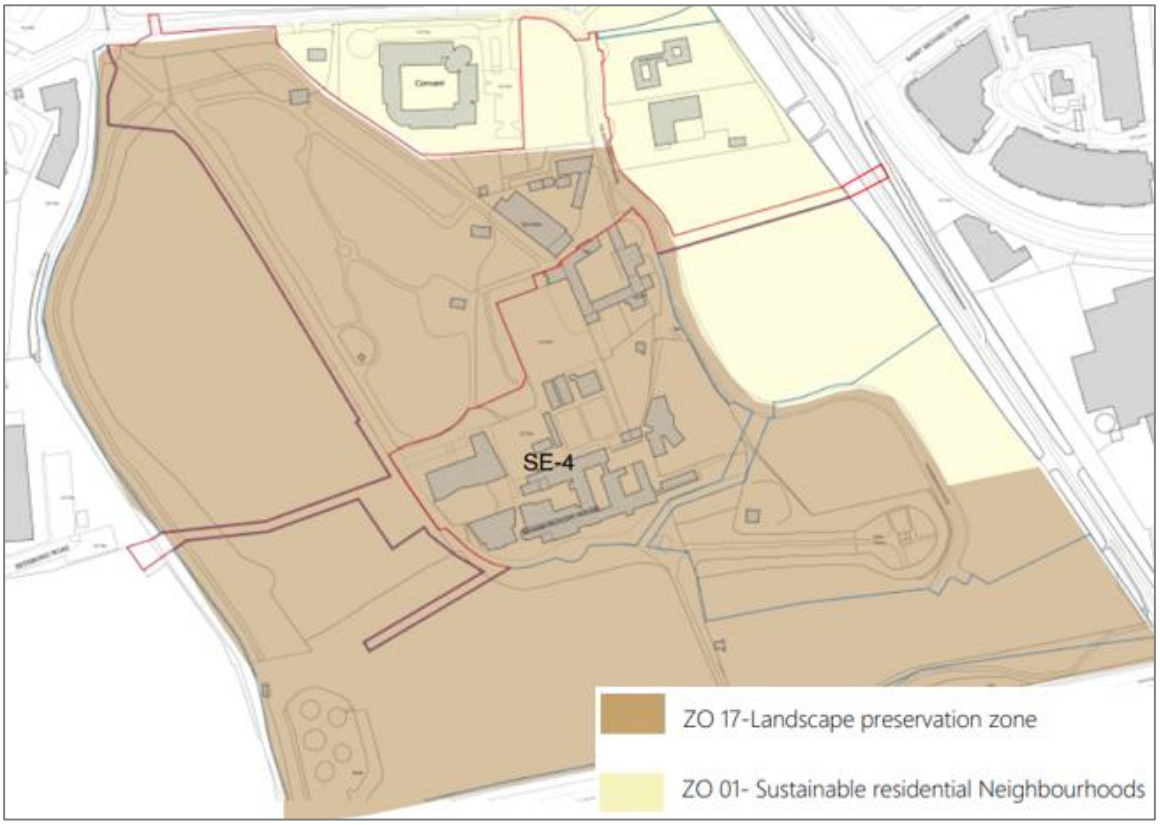


Figure 1.2. Zoning Context

The subject lands previously formed part of the 'Bessboro Farm' and parkland in the Bessboro Demesne. The farm element includes a cluster of much-altered farm buildings which in recent decades was the home of 'Cork Heritage Park' which is now closed. The subject lands are located to the north of the estate house and historic core. The majority of the subject site is within the ZO 17 '*Landscape Preservation Zone'* specifically referenced in Table 6.9 of the CDP as '*SE 4 – Bessborough House'* with site specific objectives to:

- To reinstate Historic Landscape;
- To seek use of grounds as a Neighbourhood Park in context of local area plan (H);
- To allow development within the immediate environs to the north of Bessboro House consistent with the landscape and protected structure significance of the site.

Therefore, the governing site-specific objectives allow for development on lands within the immediate environs to the north of Bessboro House, subject to it being consistent with the landscape and protected

structure significance of the site. The specific Landscape Assets for the SE4 designation are positively addressed as part of the proposed development.

Specific Landscape Asset	
J Historic Landscapes (including monuments / historic routes)	Historical paths will be reinstated; large areas of the park will be re-wild; a 20-year programme of tree management will be undertaken to reinstate visual character; and the development of The Farm and The Park precincts will reuse and reinstate buildings of heritage value, historical geometry and distinguishing features of historic parkland.
G Landmarks / Natural Features / Cultural Landscape – land forming the setting to existing landmark buildings and/or protected structures / buildings of significance	The reinstatement of the above will directly restore natural and cultural landscape features which provide critical setting context in respect of Bessboro Estate, and protected structure (PS490). The submitted Townscape/Landscape and Visual Assessment as well as Architectural Heritage Impact Assessment (contained in the submitted EIAR) considers that the proposed layout will not have a significant adverse effect on historical setting, character or amenities. In conjunction with subject proposal, the wider masterplan provides for the sensitive restoration of key landmark and cultural landscape features including the Reflection Pond to the southwest and icehouse to the west.
C Tree Canopy - Areas with existing woodlands or significant tree groups, or areas with potential for new woodlands.	As set out in the submitted Landscape Report by Ilsa Rutgers Landscape Architecture, a 20-year Parkland Management Strategy has been developed to proactively manage trees on the site with a view to reinstating visual character. The Landscape Report sets out the actual level of tree removal proposed to accommodate development in Phase 2 'The Farm'. 49 no. trees of varying quality will be removed, with 116 no. new trees planted delivering a net benefit at a ratio in excess of 2:1.
B Water / River Corridors - rivers, estuary, harbour, The Lough, Atlantic Pond, Docklands, Port of Cork	There are no waterbodies within or proximate to the site, the closest being the artificial '*Pond with 5 Island*', now overgrown, approximately 160m to the south-west of the site. As set out in the submitted overall site masterplan, the intention is to improve the biodiversity character of this asset and create a Reflection Pond as part of the wider Remembrance Park to the south of the site. The proposal being relatively low rise and located to the rear of Bessborough House will not be visible from Lough Mahon.
I Institutional Open Space	The character of the former open space will be restored consistent with its institution history by means of the removal of

the winding paths and small structures introduced in the park in the 1990s and reinstatement of historical perimeter paths.

At present the substantial area of open space to the north of Bessborough House is not publicly accessible. This will be opened up providing important net gain in amenity for the local community.

To seek use of grounds as a Neighbourhood Park in context of local area plan.

As per the submitted Architectural Design Statement by ShipseyBarry Architects, including associated Masterplan, a dedicated Neighbourhood/Remembrance Park is proposed on lands in ownership to the south of Bessborough House. These lands were formally identified by Cork City Council as the appropriate location for a neighbourhood park in the now lapsed Mahon Local Area Plan. This park will be delivered as part of Phase 3 'The North Fields' subject to zoning/development. The lands in question will be ceded to the city / stakeholders commensurate with development in this phase.

To allow for development within the immediate environs to the north of Bessboro House consistent with the landscape and protected structure significant of the site.

As established, this site-specific objective provides explicitly for development of the lands to the north of Bessborough House, as proposed by the subject development. As set out in the reporting of ShipseyBarry Architects, Ilsa Rutgers Landscape and John Cronin & Associates, the design approach respects and reflects the local historic landscape and cultural heritage context.

The remainder of the lands are zoned ZO 01 – 'Sustainable Residential Neighbourhoods'.

The principle of the proposed development has been established in relation to the previous SHD application (ABP-313206-22) about which the ACP Inspector stated:

> ***'I** am satisfied that the proposal does comply with the site-specific objectives outlined under Table 16.9.... I am satisfied that the proposed development would be acceptable in the context of land use zoning policy.'*

The Planning Authority has consistently supported development on these lands, with infrastructure including an access road and services to facilitate the further development of estate lands to the north and east being granted planning permission under reference TP 03/27028. These sites were subsequently marketed as 'serviced industrial / employment sites'. The north-east portion of the subject site was identified as one of these serviced sites suitable for future development.

This support was reiterated in the Cork City Council Chief Executive's Report in relation to the recently refused SHD application on-site (ABP-313206-22) in which they recommended that permission should be granted subject to conditions.

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Detailed Response to LRD Opinion

This section of the report outlines in detail the applicants' responses to the matters raised in the Cork City Council LRD Pre-Application Consultation Opinion received on the 26th of November 2025 (Ref. No: LRD25-10) The Council considered that the following matters need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for a large-scale residential development.

2.1 Design and Placemaking

The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals in respect of the proposed building design, site layout and of the placemaking of the development, with particular focus on the following:

a) *The development site is within the curtilage of Bessborough House which is characterised by a significant level of parkland/open space areas. The proposal to locate Block C within the Landscape Preservation Zone is noted, with the 'Landscape Assets' for this area stating that development to the North of Bessborough House is accepted in principle, as long as it is 'consistent with the landscape and protected structure significance of the site' (Table 6.9 of CDP).*

It is considered important to retain a meaningful connection between Bessborough House and the associated grounds. It is noted that 18th-century country houses and their landscapes formed part of an original design concept and are intrinsically linked. The proposed Block C, and it's associated roadway and parking area, would be located in the original pleasure gardens of the house, where a band of trees and paths were laid out. It is noted that while some developments have taken place over time, a garden character for this location has always been maintained and its relationship with the protected structure is considered of high importance. In terms of the hierarchy of spaces, the historic function of a driveway was to lead you through the parkland and then reveal the main house. As such, the presence of Block C would also alter and undermine the last vestiges of the approach landscape-setting of the main house. The proposed roadway and car parking would also occupy and be visible from within the parkland, which would have a negative visual impact on the character of the landscape and the setting of the protected structure.

It is further noted that it is a long held Council objective that the established woodland/parkland on the site of the former Cork Heritage Park should remain intact to preserve its unique sylvan character and provide passive amenity space rich in biodiversity for residents of any residential development on this site, and for future residents of the South Docklands. Block C, and its access road and car park are situated within part of the established woodland which is not considered acceptable. It is

considered that the encroachment would completely change the character of this sylvan setting in a negative manner.

Consideration should be given to revising the proposal to omit Block C, and its associated roadway and car-parking area, to preserve the character of the protected structure and its curtilage, and to ensure the character of the sylvan parkland setting is retained.

The following response should be read in conjunction with the architectural and landscape designers response to this item, as contained in the Architectural Design Statement and Landscape Design Rationale report.

From the outset, it must be noted the lands at Bessborough are predominantly in private ownership with some key stakeholders such as the HSE/'Childhood Matters' controlling inner portions of the site around the main historic house. The intention of the masterplan on Estuary View Enterprises 2020 Limited lands is to release large portions of parkland in a phased manner into public ownership for public enjoyment. Given the challenge to achieve a threshold of development to offset the infrastructure for this plan i.e. bridge connection over the green way, bespoke architectural design solutions within the unique setting, farm building conversions and high quality public realm areas, the design team has taken an approach of care, consideration and sensitivity cognisant of the historic landscape proximity to the historic Bessborough house and wider setting while proposing a design solution we feel is appropriate given these factors. Many examples of sensitive modern building interventions in the estate lands exist today and the design team have used a best practice approach to all design considerations.

Each building element proposed has been carefully considered in setting, scale, materials and how best they may enhance the wider site while maintaining respect for proximity and reading on the heritage setting. Each building has a particular response to this with building E to the furthest north from the house being able to take the most scale at 4 and 5 storeys with its narrowest edge facing the house. Building D takes a long form and proportion inspired by the retained significant farm buildings, creating an edge to the interesting historic farmyard geometry. Both Buildings D and E take materials from the agriculture corrugated iron pallet to enhance placemaking. Building C, closest to the Historic House is carefully positioned behind a high former cottage garden wall to the eastern edge while the western edge is set out by an established link to the Farm area. Building C is low slung with 2 storey and its dormer approach to East side while the park facing side presents at 3 storey. Building C is identified in dark cladding with a muted material pallet. In assessing the Park land area and viewing it as an active public open area, it was noted that much of the now sylvian landscape area was more recently planted (1980s) and did not form part of the original historic landscape intent. Within this, a sizable proportion of the planting is non-native.

The issued Council opinion includes some differing messages in respect of Block C. For example, the Conservation Department recommend the removal of the block, while the Architects Department offer a view that it is considered to be an appropriate edge treatment to the parkland in terms of height and architectural expression. The Parks Department report states that Block C and parking should be moved into the public park.

In relation to historic landscape and interrelationship with Bessborough House, the reading of the main structure as per 1841 Map clearly shows the reveal of the main house after passing through the main avenue to the north and on arrival from the west at the forecourt. The design and siting of building C does not alter the experience as read from this map and a significant tree line is maintained as visual cover to mitigate any visual sensitivity. As illustrated in the Architectural Design Statement, the approach today to the main house is an experience of open landscape to the West and a heavy treelined approach to the east side of the avenue. It is objectively considered that the proposed design approach does not alter the approach landscape-setting of the main house.

The design approach is landscape-led (further commentary on this is provided under Point 8 below), with a focus on reinstating historic landscape, which has suffered from degradation over the last number of decades. As set out in the Landscape Design Rationale Report, the tree planting in the area of Block C is principally a modern intervention. The original trees at this location were removed in the 1980s. The vast majority of them are Eucalyptus and Sycamore trees (Refer to the Arboricultural Impact Assessment drawings and report). Of the total 49 trees to be removed across the application, only 16 are native trees, of which 3 no. are Category A in terms of quality. Mitigation for this loss, includes the planting of 116 No. new semi-mature trees, which taken alongside the above referenced focused measures to reinstate the historic landscape, will have sizable benefits. The proposed retention of Block C will also play an important role when considering the parkland as a new public amenity. Supervision is essential in the area particularly as the upper floors at 3 storeys provide for deep views up the North end of the Park (not available to building D). Parking provision is not feasible in a basement format given the proximity to historic structures and treelines. when combined with a rigorous planting program, the Applicant considers that building C does not have a negative impact on the historic setting, with significant treelines maintained and furthermore it plays an important role in the success of the proposed public use of the parkland, which is maintained (now in a sylvan format to the north).

We strongly agree with the inspectors assessment under SHD Ref : ABP-313206 which objectively concluded:

“Block C is located to the north of Bessborough House and west of an existing car park. This block will encroach onto existing parkland within the historic curtilage of the Bessborough House. In doing so the proposal will entail loss of some existing trees...I would be of the view that this Block would have a limited impact on the historic parkland setting of the protected structure given it is located to the north of the existing protected structure and adjacent existing structures. The proposal has limited impact in terms of footprint on the parklands area to the west and I consider that an appropriate balance is struck between the providing for an efficient level of development while respecting the architectural heritage value of the Bessborough House and its historical curtilage”.

b) *"It is considered that the proposal for two no. residential blocks in the farmyard setting, Blocks D and E, is considered acceptable in principle. The location of these blocks in relation to the protected structure on the site, Bessborough House, is noted. It is considered that in terms of a hierarchy of historic structures within this demesne,*

consideration should be given to the impacts of the proposed Blocks D and E on the character of Bessborough House and its associated landscape.
While the architectural form and expression of Block D is considered to be an appropriate response to the context, and overall presents an imaginative and high-quality design, the proposed height of the block, approximately one storey above Bessborough House, may lead to hierarchical concerns.
The design of proposed Block E is similar to that of Block D, in terms of architectural composition and expression, but is considered to be less successful due to the height and level changes. It is considered that a one storey reduction in height would result in a more appropriate response to the scale established elsewhere within the site. It is also considered that an adjustment to the roof design to a more unifying, linear roof form as per Block D, may be more appropriate.
Consideration should be given to revising the proposal to revise Blocks D and E as indicated above to preserve the character of the protected structure and its curtilage and to maintain the hierarchy of buildings relative to Bessborough House."

In terms of Block E to the north, careful consideration at inception was given to a threshold height that would not negatively impact the site at large .Through 3D modelling and testing of scales and given the distance from the main house, it is proposed that the current scale of Building is suitable given its setting to the rear of the site, its forming of an entrance way to the new public parklands and its composition in scale break-up. An additional view has been commissioned from the South for further assessment of this matter.

With regards to Building D, it is proposed to retain the current height as proposed. We note that it is buffered by an existing building to the South and also the orientation provides for a lower length elevation to the southern more sensitive viewpoint. Critically as concluded in John Cronin & Associates Heritage assessment report (Chapter 10 of submitted EIAR), there is no impact on setting of Bessborough House.

Again, we share the view of the inspector under the SHD application, whereby the design approach was considered wholly acceptable:

"The overall form and materiality of the proposal has adequate regard to its location and setting relative to the protected structure. As noted, Block C is a flat roof structure that is subordinate in height to the Bessborough House. Blocks A and B retain the existing character of the farm buildings while Block D and E feature references to the existing farm building with use of corrugated steel cladding at the upper levels and roof profiles (pitched) that echo the farm the structures. I am satisfied the overall scale and layout of the proposal has adequate regard to the setting of the existing protected structure and that the development proposed in this application would not have a detrimental impact on the character and setting of such and provides for a design that would be a positive addition on these lands and entails reuse of existing structures associated with the protected structure".

c) *It is considered that the long-distant views 5, 6 & 7 show that the proposed height and massing of Blocks D and E would undermine the setting of the Bessborough House and its historic landscape, as the red roofs of these structures would punctuate the tree line and create an uncomfortable backdrop that would be out of character with the historic demesne setting. These large buildings, even at a considerable distance, would alter*

views to the protected structure and its historic landscape, and thus affect its essential character. The sketches show a muted colour red for the roofs of Blocks D & E but the visuals show quite a bright red. A darker/muted red colour would be more appropriate, particularly in terms of wider views from south of the river (Views 5, 6 & 7). Consideration should be given to revising the proposed roof colour of these blocks to reduce the impacts on the protected structure, particularly when viewed from a distance.

The design genesis for the use of the traditional red cladding material as proposed is taken from the later (1900's) former farmyard buildings materials on site and we propose this design approach has significant benefits in terms of distinctiveness / placemaking for the old farmyard area as a whole. During the Section 32B Opinion Meeting, the Council did not disagree with the retention of this colour pallet. In terms of Block E to the north, careful consideration at inception was given to a threshold height that would not negatively impact the wider site. Through 3D modelling and testing of scales and given the distance from the main house it is proposed the current scale of Building is suitable given its setting to the rear of the site, its forming of an entrance way to the new public parklands and its composition in scale break-up. An additional view (Proposed Winter VVM 21) has been commissioned from the South for further assessment of this matter, with no potential for significant impacts identified. We respectfully submit that the prepared photomontages do not indicate any impact arising from the red cladding material. The Applicant is very happy to agree final treatments and finishes with the Council by way of applied planning condition.

With regard to Building D, we propose to retain the current height as proposed. We note that is buffered by an existing building to the South and also the orientation provides for a lower length elevation to the southern more sensitive viewpoint . The Cultural Heritage chapter of the EIAR concludes that there is no impact on the setting of Bessborough House.

d) *In relation to the points above, a full visual impact assessment should be submitted, ensuring both Summer and Winter views are provided, to allow for a full assessment of the visual impacts of the proposed development. The applicant should also ensure that Block E is visible in closer-range views, as appropriate. (Please note the contents of the Conservation, Parks & Recreation, and City Architects Reports in this regard, see Appendix C).*

A full Landscape and Visual Impact Assessment (LVIA) has been prepared as contained in Chapter 4 of the submitted EIAR. The requirement for additional views was clarified with the Council.

As per the findings of Chapter 4 of the EIAR Landscape and Visual Impact., the proposed operational development will result in 'moderate-slight' overall operational stage significance of townscape impact, with a neutral quality of effect. There are clusters of modern buildings within Bessborough Estate and the proposed development will serve as an extension of that existing landscape fabric and character, broadening the cluster of development at the heart of the estate. Furthermore, there are several multi-storey buildings within 500m of this area (e.g. Mahon Industrial Estate, Loughmahon Technology Park, City Gate, Mahon Point Retail Park etc.); buildings that extend up to 18m in height, in

some instances: again, all of which are on lands that originally formed part of the Bessborough Estate. Lastly, the high-end architectural quality, detail and finish of the five proposed blocks is likely to prove a distinct, long-term asset to the landscape/townscape character of the study area.

2.2 Other Matters Raised

1) *A statement on how the development has considered and incorporated placemaking and how the proposal would respect, reflect or contribute to the character and vibrancy of the area and how the development would deliver or contribute towards a quality, sustainable residential environment and public realm areas with a focus on accessibility, connectivity and permeability.*

   This statement is contained within the submitted Architectural Design Statement by ShipseyBarry Architects. It has been demonstrated that the proposed development is high quality in design approach and will contribute positively to placemaking to the benefit of existing and future communities in the Mahon area.

2) *Cultural Heritage: A comprehensive cultural heritage assessment in relation to archaeology, built heritage and cultural heritage legacy should be submitted, ensuring that all details, reports and documentation for same are fully up to date and relate entirely to the proposed development.*

   This is addressed under Chapter 10 of the submitted EIAR – Cultural Heritage – by John Cronin & Associates. It has been objectively concluded that the proposed development will not give rise to any significant impacts on cultural heritage assets in the local area.

3) *Schedule of Accommodation: A detailed schedule of accommodation demonstrating compliance with the relevant residential/housing standards.*

   A detailed schedule of accommodation demonstrating compliance with relevant standards is contained within the submitted Architectural Design Statement.

4) *Detail of areas intended to be taken in charge by the local authority, including any surface water management features (SUDS) within such areas.*

   A drawing has been submitted outlining areas proposed to be taken in charge by the local authority, including any surface water management features (SUDS) within such areas. Please refer to submitted drawing no. SB-2020-107-002 by ShipseyBarry Architects.

5) *Density & Housing Mix: The application should include a detailed rationale for the proposed residential density and housing mix having regard to the provisions of the City Development Plan and relevant national and regional planning policy including the 'Sustainable and Compact Settlements Guidelines for Planning Authorities, 2024', 'Urban Design Manual', The 'Design Standards for New Apartments - Guidelines for Planning Authorities' (2025) and the 'Urban Development and Building Heights - Guidelines for Planning Authorities' (2018).*

   The submitted Planning Statement by HW Planning addresses matters related to housing mix. As set out in the report, the policies of the Cork City Development Plan 2022-2028 have been superseded by the Design Standards for Apartments, Guidelines for Planning Authorities (2025). Specifically, the provisions of Specific Planning Policy Requirement 1 apply to the proposed development:

Specific Planning Policy Requirement 1

(A) **With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.**

(B) **Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.**

The proposed housing mix of 70 no. 1-beds; 69 no. 2-beds and 1 no. 3-bed is compliant with planning policy. It will meet demand for much needed new homes in the Mahon area, as well as providing improved housing choice within an area principally characterized by conventional dwelling housing stock.

6) *Consideration of the proposals to address the following Conservation related requirements (as set out in the Conservation Report attached in Appendix C):*

   a) *Consideration should be given to the omission of Block C entirely.*
   b) *Consideration should be given to the reduction in height of Block D from 4 storeys to 3 storeys (including lowering the 3-storey section to 2 storeys).*
   c) *Consideration should be given to reducing Block E in height from 5 storeys to 4 storeys.*
   d) *Consideration should be given to ensuring that the roof shade/ colour of Blocks D & E is subtle to reduce the visual dominance of these structures particularly in wider views.*
   e) *Consideration should be given to ensuring both summer and winter views are provided, and each view point is marked on the plan. Views should also ensure Block Eis visible in a closer-range view.*

   The item is addressed above in detail. We respectfully submit that it is not necessary to revise the design of the proposed development having regard to the above points. The design has been subject to rigorous assessment by the project design team and is deemed to respond positively to local context, including cultural heritage. Further, the design has been assessed by An Coimisiún Pleanála and deemed to be wholly appropriate:

   In assessing the City Council's recommended omission of Block C under the SHD application, the Inspector (at Section 10.8.11 of his report) noted:

   > *'I would be of the view that this Block would have a limited impact on the historic parkland setting of the protected structure given it is located to the north of the existing protected structure and adjacent existing structures. The proposal has limited impact in terms of footprint on the parklands area to the west and I consider that an appropriate balance is struck between the providing for an efficient level of development while respecting the architectural heritage value of the Bessbough House and its historical curtilage'.*

   Further, the Inspector did not agree with the assessment of Cork City Council that Blocks D and E should be reduced by one storey, and in conclusion noted:

'the proposal provides for a development that is acceptable in terms of scale, design and layout with adequate regard had to the impact of such on the setting of the existing protected structure and its overall historic landscape. The proposal would have positive visual impact and is of acceptable quality in terms of architectural character and materiality. The CE Report recommendation for amendment is noted, however I am of the view that the proposal is acceptable in the form it has been submitted'.

Based on the above, the scale, density and height of the development proposed at 'The Farm' was considered appropriate by the Commission.

A full set of photomontages is included as part of the overall submission with an additional view of Block E from the south. No significant landscape and visual impacts are identified.

7) *Architecture: Consideration of the proposals to address the following Architecture related requirements (as set out in the Architects Report attached in Appendix C):*

   a) *Outside of conservation and heritage considerations, in terms of urban and architectural design Block C is considered to be an appropriate edge treatment to the parkland in terms of height and architectural expression. However, the triangular form is such that it encroaches to a large extent into the existing parkland, and when combined with the associated vehicular access and parking the impact on the park is significant. Considered in terms of placemaking - an aspiration which is a 'central focus' of the CCC Development Plan (sections 11.6-11.12) - the impact of the loss of mature trees and the introduction of the vehicle infrastructure deep into the parkland is considered as having an undue negative effect.*
   Whilst the quality of the architectural design meets the criteria described, the site strategy is such that it will diminish the character of the space which is established by way of the impressive landscaping.

   Consideration should be given to a revision of the proposed development to reduce the footprint of Block C, perhaps to a more linear form, in order to retain a greater number of established trees.

   b) *Consideration should be given to minimising the extent of vehicular infrastructure extending to Block C.*

   c) *Consideration should be given to reducing the overall height of Block E by a single storey, and redistributing the accommodation so as to create a more linear, low-lying singular roof form similar to Block D.*

The above referenced points are addressed in the 'Architects Response to LRD Opinion' section of the submitted Architectural Design Statement by ShipseyBarry.

The commentary that an appropriate edge formed by Block C in terms of height and expression is welcomed. It is proposed to retain the site layout route and parking as currently proposed. The site is restricted in terms of basement parking and also the feasibility issues are prohibitive given the combined cost of infrastructure delivery for the scheme. We feel the north south connection between the farm and the rear of the main house is preserved and though some trees are lost in this area, a significant tree buffer is retained and this combined with extensive re planting of over 110 trees off sets non-native and lower quality tree loss. We feel the site plan as set out facilitates and large portion of private land to be offered over for public enjoyment with sylvan character still

maintained through a threshold approach to tree retention across all the lands to the north and west.

Similarly, it is proposed to retain Block E at its current height as presented. The design team feel a low slung block would detract from the special nature of Block D by creating duality of the forms . We respectfully submit that the northerly-most block and the receiving environment in this location is less sensitive and can comfortably accommodate the proposed scale.

We share the inspectors view in his report on SHD ref ABP-313206 (as stated in 10.8.13)

> *'Conclusion on Visual Impact: I would consider that the proposal provides for a development that is acceptable in terms of scale, design and layout with adequate regard had to the impact of such on the setting of the existing protected structure and its overall historic landscape. The proposal would have positive visual impact and is of acceptable quality in terms of architectural character and materiality. The CE Report recommendation for amendment is noted, however I am of the view that the proposal is acceptable in the form it has been submitted'.*

8) *Consideration of the proposals to address the following Parks and Recreation related requirements (as set out in the Parks and Recreation Report attached in Appendix C):*

   a) *It is a long held Council objective that the established woodland/parkland on the site of the former Cork Heritage Park should remain intact to preserve its unique sylvan character and provide passive amenity space rich in biodiversity for residents of any residential development on this site , and for future residents of the South Docklands. Block C, and its access road and car park are situated within part of the established woodland and is not considered to be acceptable. It is considered that the encroachment would completely change the character of this sylvan setting in a negative manner. It will involve the felling of many established trees as identified on the landscape drawings and, many more will have to be removed as they will be seriously impacted by construction works, changes in ground levels and water table. The level of high-quality tree loss is significant and not appropriate from an arboricultural perspective. It is considered that the footprint for Block C and its associated carpark should be incorporated into the proposed Public Park.*

A landscape-led approach has been taken to the planned development of these lands. This has been shaped by a forensic assessment of the historic landscape context and reinstatement opportunities. An Historic Landscape Assessment was prepared by Forestbird Design in August 20201 to guide the approach, the key principles of which have been taken forward by Ilsa Rutgers Landscape as part of design development. A detailed review of historical maps and aerial photography confirms that the most significant changes to the historic landscape occurred in the last 30 years. The proposed development will contribute to the reinstatement of the historic landscape by means of the following:

- Remove the winding paths and small structures introduced in the park in the 1990s and reinstate the historical paths along the perimeter of the park;

[1] A copy of this report is enclosed with the Landscape Strategy Report for the application.

- Re-wild large areas of the park to create wild meadow and rough grass with mowed routes along desire lines rather than hard standing which is a recent intervention;

- A lot of trees have been planted on the subject lands over the last 20 years, the manner of which is not in keeping with the historic landscape. Further, a lot of these trees are low value. At the Section 247 meeting, Cork City Council recommended that tree removal should be kept to a minimum. In response to this and having regard to the explicit policy objective in hand, a Parkland Management Strategy[2] is proposed over the next 20 years to gradually thin out diseased and unwanted trees as they reach the end of their life span and the replacement of these with new native deciduous and evergreen trees along the perimeter and in clumps on the western side of the road. Over time, this will achieve a more equal relationship between parcels east and west of the approach road and open the site up visually consistent with its historic use;

- Development of The Farm area using a hierarchy of buildings of heritage value and historic geometry, including retention of linear barrel-vaulted agricultural buildings in high quality stonework. Enhancement of the farmyard/kitchen garden space which evolves directly from its historic use;

- The pattern and scale of The Park layout respects the key distinguishing features in the historical assessment, namely the woodland buffer to the north and walled garden and historic buildings to the south.

This has been reviewed and validated by John Cronin & Associates from a heritage perspective who have confirmed their professional view that the proposals will not detract from historical character, rather, it will retain and reinstate important historic fabric.

As set out in the Landscape Design Rationale Report, the tree planting in the area of Block C is principally a modern intervention. The original trees at this location were removed over the last 2-3 decades. The vast majority of them are Eucalyptus and Sycamore trees (Refer to the Arboricultural Impact Assessment drawings and report). Of the total 49 trees to be removed across the application, only 16 are native trees, of which 3 no. are Category A in terms of quality. Mitigation for this loss, includes the planting of 116 No. new semi-mature trees, which taken alongside the above referenced focused measures to reinstate the historic landscape, will have sizable benefits.

The Council's architectural department have commented favorably on the inclusion of Building C which is considered to form an appropriate edge formed by Building C in terms of height and expression. The provision of identified car parking in the area is low intervention, with protection of existing tree roots as per submitted specifications. The Applicant strongly submits that the proposed design approach to Building C is appropriate and will not detract from sylvan setting. We respectfully submit that the above referenced suggestion that "the footprint for Block C and its associated carpark should be incorporated into the proposed Public Park" represents a potentially greater intervention in the historic landscape than that proposed.

b) *The Landscape Design Strategy and Masterplan is broadly conceptual, and consideration should be given to detailed submissions on the following landscape areas:*

[2] For absolute clarity, the Landscape Report sets out the actual level of tree removal proposed to accommodate the proposed development. The scope of the Parkland Management Strategy is to propose a methodology on how trees will be proactively managed over a 20-year period. The agreement of this with Cork City Council can be secured by way of applied planning condition.

Bioretention areas, Tree Pits,
Green roofs, planting buffers,
play equipment/play zones to be submitted for review.
the size and quantities of all plant material will be required.

The prepared Landscape Design Strategy is detailed in nature.

- Bioretention Areas: The location of bioretention areas, attenuation tanks, and permeable paving within parking bays are indicated on the landscape drawings (Landscape Masterplan Drawing No. 2000 and Hard Landscaping and Street Furniture Drawing No. 2400). The surface water drainage strategy and capacity calculations are given In the Engineer's drawings and reports. Refer to Egis Consultant Engineer's Drawing 4005.
- Tree Pits: The location of tree pits are indicated on the Landscape Masterplan Drawing No. 2000, as well as on Egis Consultant Engineer's Drawing 4005.
- Green Roofs: A green roof system is proposed on Block C and the small Sun Lounge building within the courtyard. This typically includes a growing medium, drainage layers and planting (most commonly a variety of sedum or other succulent species as these can sustain short periods of drought). The construction details and specific plant mix are typically agreed with the selected specialist contractor and will be uploaded to BCAR.
- Planting Buffers: A selection of planting buffers have been specified against building edges to offer privacy to ground floor apartments. The planting mix varies according to the application and orientation of the planter. Refer to the Secondary Planting Plan - Landscape Drawing No. 2505).
- Play Equipment / Play Zones: The plan layout of the proposed playground within the park is shown on the Landscape Masterplan Drawing No. 2000 and Hard Landscaping and Street Furniture Drawing No. 2400. The proposed play safety surface is engineered wood fibre to comply with EN 1177 and the equipment will be made of natural Robinia timber. The unpainted, untreated timber equipment and wood fibre surfacing is considered sympathetic to the natural setting within the park. The playground equipment includes a slide, springers and wobble bridge. Timber balance beams are proposed on the lawn within the park and communal spaces. All equipment to comply with EN 1176. Final details of playground equipment will be agreed with Cork City Council.

c) The size and quantities of all plant material will be required.

Details of all planting is given on the Primary and Secondary Planting Plans (Landscape Drawing No. 2500 and 2505). The species, height, girth size and quantity of all trees is provided on the Primary Planting Plan (Drawing No. 2500).

A breakdown of the proposed mix of perennial plants for planters and well as the proposed seed mix for meadows and grass areas is provided on the Secondary Planting Plan. Drawing No. 2505.

d) Landscape Management and Maintenance schedules will also be required.

A detailed Woodland Management Plan is provided at the end of the Landscape Design Report. This document looks at the maintenance and management of each precinct within the grounds over a short to medium term period.

Maintenance contract scope and commitments are typically included in the tender and construction information and will be agreed with Cork City Council, prior to uploading all documentation to BCAR, prior to commencement of the works.

9) *Transport: Consideration of the proposals to address the following Strategic Transport related requirements (as set out in the Strategic Transport Planning Report attached in Appendix C):*

Where possible, the points below have been incorporated into the proposed development, as per submitted site layout plans, and as confirmed in the submitted Architectural Design Statement.

a) *"The proposed development has included many positive interventions with respect to the active travel infrastructure. To further enhance pedestrian connectivity within the scheme consideration should be given to the following additional measures:*

i. The extension of the footpath on Bessborough Road in front of the existing avenue entrance to Bessborough House. Cork City Council have active plans to improve active travel connectivity at this location and reference to these plans should be made in any updates to the active travel infrastructure at this location.

The footpath has been extended the length of the site to the west side of the avenue from the main entrance gate.

ii. The re-instatement of the footpath on the southern side of Bessborough Road where a historical site compound previously existed.

We are unsure of the exact location of this request. We note public footpaths on Bessborough road are not in the control of the Applicant and are outside our remit to adjust.

iii. The widening of the opening serving the new pedestrian access point onto Bessborough Road to a minimum of 2.0 metres and the removal of the gated entrance

The opening is adjusted to 2m with removal of gate as requested.

iv. The northern extension of the footpath running to the west of Block E, additionally ensure the footpath width to the west of Block Eis a minimum of 2.0 metres.

The footpath to the west of block has been widened to 2m as requested.

v. The provision of a footpath to the north of Block B and the sunroom,

A footpath has been provided in the location as requested.

vi. Provide for an informal crossing point between the entrance between the Sun Room and Workshop across to the footpath to the west of Block E, this will require the removal of some planned vegetation at this location.

This area has been adjusted to allow for a crossing point as requested.

vii. The removal of the gates entering the Communal Amenity Area, to ensure unimpeded access to the general public.

It is proposed to retain the gates at this location to provide a clear demarcation between residents amenity and public amenity for safe and secure residents enjoyment. Ample public amenity is provided for in the public parkland area.

viii. Remove the gates to the south of Block A to ensure unimpeded access between the Public Plaza and Public Park Lands.

It is proposed to retain the gates at this location to provide a clear demarcation between residents amenity and public amenity for safe and secure residents enjoyment. Ample public amenity is provided for in the public parkland area.

ix. Remove the gates at either end of the footpath running to the south east of Block D.

We are proposing to retain the gates as this location to provide a clear demarcation for residents amenity space.

x. The extent of Creehe Playground impacts on the visibility of the New Park Land access route, it would be beneficial to extend the playground either to the northeast or southwest to reduce the depth of the playground.

Modifications have been made to the creche playground area as requested.

xi. Remove the gate to the footpath to the southeast of Block C

We are proposing to retain the existing gate as this location as it opens to third party lands on the HSE Eist linn / TUSLA site which is a highly sensitive and security conscious facility.

xii. Relocate the proposed pedestrian crossing to directly opposite the footpath leading to the new footbridge."

We have relocated the pedestrian crossing as requested to be opposite the crossing for the new footbridge. The revised position has been agreed with the Council.

b) *Consideration should be given to the inclusion of some additional cycle parking bays to serve Block E. These spaces do not need to be internalised within the building itself but could be housed in a sperate independent structure externally or attached to the building, which ever option is deemed the most suitable.*

As requested, we have provided an additional 40 bike spaces within building E adjacent to the northern lift Core.

c) *The proposed quantum of parking proposed as part of the overall development is considered low at 0.39 spaces per apartment considering its location and not withstanding its good access to the Greenway and local bus services. Although, it is acceptable to provide parking at a rate less than the that presented in the Cork City Council Development Plan 2022-2028, the applicant is requested to submit further justification to support a lower parking rate, particularly referencing other similar type developments in the wider city.*

The parking rate chosen for the development reflects the location of the proposed development in close proximity to significant existing and planned public transport and active travel infrastructure and the proximity of the development to existing

commercial/business/employment and school services which will promote reduced use of the private car and a modal shift to increased use of more sustainable transport modes.

The site is immediately adjacent to a well-established Greenway, the Passage West Greenway, which provides an active travel route to Cork City to the west and Douglas/Rochestown/Passage to the east.

The site is adjacent to Skehard Road and Mahon Link Road which are very well served with existing public bus services which are to be further enhanced under the Cork Bus Connects project in the near future.

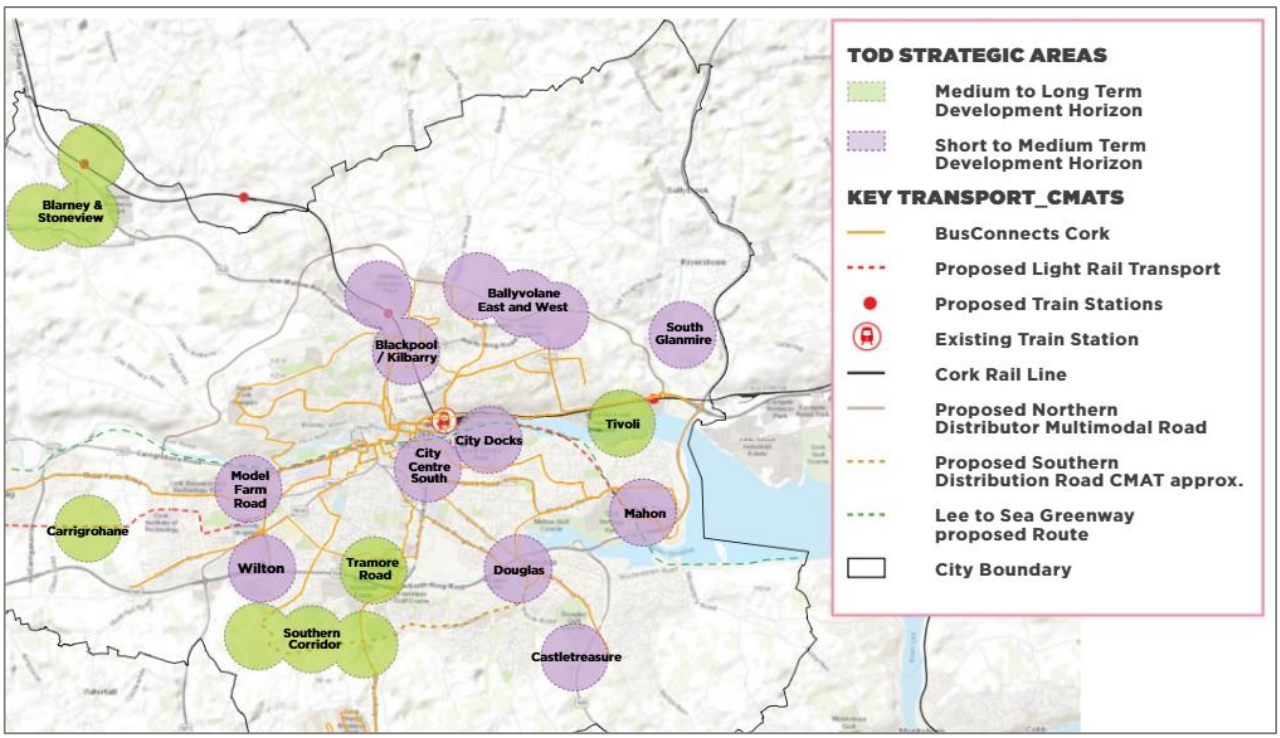
A planned Light-Rail route will also be immediately adjacent to the development site in the medium term providing significant public transport capacity and offering extensive connectivity for residents of the development to the wider Cork area.

The Cork City Development Plan 2022-2028 provides maximum rates for car-parking and also seeks to focus “new residential and employment development in areas with good access to the planned public transport network, and in locations where people can live close to work, making it easier to walk and cycle, yielding the potential for big changes in the way people move around the city”.

“The Passage Railway Greenway was previously identified as a key transport corridor by Cork City Council as it has the potential to provide the best quality and most direct route for pedestrians and cyclists between the City Centre and Mahon. It recommended various improvement measures to the greenway including the widening of the existing route, the provision of lighting and the improvement of access to the greenway. The project will provide significantly improved facilities for cyclists and pedestrians along the greenway route from Páirc Uí Chaoimh to Mahon and improve its amenity value. In addition, this route may be shared by the proposed Light Rail section between Mahon and the City Centre.”

In the Development Plan Cork City Council expresses an ambition of to exceed the targets set for sustainable transport modes in CMATS and the proposed development is ideally placed to assist with this ambition for the Blackrock/Mahon area. This ambition and Mahon’s accessibility are acknowledged in the Two Year Progress Report for the Cork City

Development Plan 2022-2028 in which Mahon is identified as a 'short-medium' term Transport Orientated Development (TOD) Strategic Area.



TOD Strategic Areas, Two Year Progress Report on the Cork City Development Plan 2022-2028

We note the conclusions drawn by the planning inspector under the SHD application in relation to car parking provision:

'I consider that in this this instance given the location of the proposal and the nature of use that a reduced level of parking is acceptable from the maximum standards and the provision 58 no. spaces would be acceptable. In the case of Development Plan policy, the car parking standards are maximum standards and not minimum standards with scope to consider the development in the context of accessibility and public transport (Section 4.103). It is also essential to point out the fact that a development of this scale and nature cannot be facilitated with car parking for every apartment unit to achieve sustainable development objectives as well as in terms of its setting within the curtilage of a protected structure and historic landscape'.

Based on all of the above the proposed lower rate of car-parking, and associated high rate of cycle parking provision, aligns well with the ambition of Cork City Council in achieving significant modal shift from the use of the private car to more sustainable transport modes.

10) *Traffic & Transport: Consideration of the proposals to address the following Traffic and Transport Assessment related requirements (as set out in the Strategic Transport Planning Report attached in Appendix C):*

a) *In relation to Traffic Generation, the volume of traffic generation presented seems on the low side and should be revisited based on the data obtained from the adjacent Dara Park development, as noted in the submitted documentation.*

The trip generation rates used in the Traffic and Transport Assessment (TTA) submitted with the planning application are based on the traffic survey (conducted in early October

2025 to inform this TTA) of the vehicle movements at the adjacent Dara Park development, as requested in the Opinion Response from Cork City Council.

b) *In relation to Traffic Distribution, the final submitted Traffic and Transportation Assessment should present a distribution profile reflecting on the existing distribution of traffic from the area.*

Trip distribution in the TTA is based on the existing trip distribution profiles in the area as measured in the October 2025 traffic survey conducted to inform this TTA.

c) *In relation to Traffic Assignment the submitted transportation assessment would benefit from presenting the projected increase in traffic along each link junction within the study area to allow for ease of comparison between the 'with' and 'without' development scenarios.*

The TTA presents the projected increase in traffic at each junction in the study area in a 'With Development' and 'Without Development' scenario to allow ease of comparison, as requested.

11) *Drainage: Consideration of the proposals to address the following Drainage related requirements (as set out in the Drainage Report attached in Appendix C):*

(a) *"The applicant is requested to provide further consideration of, and possible amendment to, the documents and/or design proposals in respect of the proposed surface water management arrangements of the development, with particular focus on the following:*

- *A clear drainage strategy for the site (Drainage Impact Assessment), detailed in an engineering or infrastructure report.*

A Drainage Impact Assessment has been prepared by Egis and included within the planning pack which presents a clear drainage strategy for the site. It is noted that the drainage strategy enclosed as part of the Section 32 submission was stated to be acceptable by Tony Donovan, Senior Engineer at the Council Urban and Rural Water Department.

- *A dedicated storm water drainage drawing, showing the complete drainage network including all the contributing SuDS features (green roofs, rainwater harvesting, swales, tree pits etc.) and discharge location.*

A standalone SuDS layout including the stormwater network is included as part of the planning pack, please refer to drawing number 25629-EEI-UD-XX-DR-CE-04002 by Egis. In order to present these details at an appropriately legible scale, a separate drawing showing the attenuation facilities and connection to the outfall is included within the pack, please refer to drawing number 25629-EEI-UD-XX-DR-CE-04001.

- *Full designs and calculations tor the drainage network, including each of the SuDS features, detailing their infiltration, storage or attenuation contribution to limiting site run-off.*

Full calculations of the storm network and attenuation requirements have been included in Appendix 5 of the Drainage Impact Assessment. The contribution of permeable paving has not been considered in relation to reducing the storm water run-off.

- *Full details of any/all attenuation tanks to submitted to, and to be agreed and approved by the Drainage Section. Access to attenuation tanks to be provided on both the upstream and downstream sides of the tank. Final access arrangements to be agreed and approved by the Drainage Section.*

Attenuation tank details are provided in drawing no 25629-EEI-UD-XX-DR-CE-04010, including access details.

- *All soakaways shall be designed in accordance with BRE Digest 365 or similar as approved by the Drainage Section of the Planning Authority. Soakaways are to be located a minimum of 5m away from buildings and 3m from property boundaries.*

No soakaways have been included as part of the SuDS regime to be installed as part of this development.

- *Permeable paving is not permitted in public areas to be taken in charge. It can be included within private properties but its contribution to reducing the storm water run-off should not be considered.*

The permeable paving to be installed in public areas is not intended to be Taken in Charge. Refer to Shipsey Barry drawing SB-2020-107-002 for an illustration of areas to be Taken in Charge.

- *The drainage strategy for the site must also consider and outline how the drainage network will be operated and maintained. In particular, how SuDS features will be accessed and maintained safely (i.e. attenuation tanks).*

Operation and maintenance has been considered in the design of the drainage strategy. The Maintenance Regime for SuDS elements is presented in Section 2.4 of the Drainage Impact Assessment.

- *Upon completion, the Applicant shall submit a SuDS Assessment Report based on the as-constructed development. This report shall include drainage layouts, drawings, details, calculations and confirm the discharge rate from the development."*

A SuDS Assessment Report will be completed outlining the as-built development upon completion of this project.

(b) *"The applicant is requested to refer to the following documents:*
Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - issued by the Department of Housing, Local Government and Heritage.
Implementation of Urban Nature-Based Solutions Guidance Document for Planners, Developers and Developer Agents - issued by LAWPRO."

These documents have been reviewed and considered in full. They are referenced in Section 2.1 of the Drainage Impact Assessment.

12) *Infrastructure: Consideration of the proposals to address the following Infrastructure related requirements (as set out in the Infrastructure Report attached in Appendix C):*

(a) *Cork City Council will be delivering new footpaths and a bi-directional cycle lane on Bessborough Road. As part of this the existing mini-roundabout is to be removed and replaced with priority T junctions.*
A new footpath will be built eastwards from the entrance to Bessborough estate to link up with the footpath on the southern side of Bessborough Farm Road. The existing zebra crossing and footpath on the northern side of Bessborough Road will be removed. This work is construction in late 2026 or into 2027. The applicant is requested to ensure that the proposed development will take the above into consideration and be compatible with same.

The proposed footpath to be connected to Bessborough Road to serve the proposed development can be tied-into the planned footpath and cycle lane improvements to be carried out by Cork City Council.

The Applicant has engaged with the Infrastructure Department in Cork City Council who are satisfied that their planned improvements can be fully and successfully integrated with the development proposals for connections to Bessborough Road.

(b) *The proposed development adjoins the Passage Railway Greenway and includes for a new cycle/pedestrian bridge over the greenway connecting into the existing greenway connection ramp at Mahon. Consideration should be given to ensuring that the proposed bridge integrates safely with the present greenway and does not inhibit the development of the LRT. The applicant is requested to liaise with Cork City Council's Infrastructure Directorate prior to submission of a planning application to agree the details of the proposed cycle/pedestrian bridge and connection.*

The project Design Team have liaised with Cork City Council in respect of bridge design in detail since the LRD Opinion issue and have made requested design adjustments, reaching agreement in principle on the current bridge design proposal as submitted.

13) *Audits: The applicant is requested to prepare an independent Quality Audit which should include: Road Safety Audit, Access Audit, Walking Audit an Cycle Audit.*
These should be carried out in accordance with the Design Manual for Urban Roads & Streets (DMURS) Guidance and TII (Transport Infrastructure Ireland) standards and should be submitted as part of the documentation for any planning application.

A Quality Audit has been carried out which incorporates a Road Safety Audit, an Access Audit, a Walking Audit and a Cycle Audit.

These audits have been carried out in accordance with the Design Manual for Urban Roads and Streets (DMURS) and relevant TII standards.

14) *Biodiversity: Consideration of the proposals to address the following Biodiversity related requirements (as set out in the Biodiversity Report attached in Appendix C):*

a) *The applicant is to submit a biodiversity enhancement section in the documentation proposed to be submitted (EIAR, etc...) to highlight providing nesting opportunities for a wide variety of breeding bird species, provide roosting boxes for the bat species, hibernacula for hedgehogs and reptiles.*

Chapter 9 of the submitted EIAR includes biodiversity and landscaping plans to include focused improvement measures for bats, birds, and other mammals.

b) *The applicant is requested to ensure that any wildflower seeds should be of local provenance and to follow the All-Ireland Pollinator Plan.*

This will be adhered to. As detailed in Drawing 210604 2500 a more diverse rough grassland sward which is of higher ecological value for invertebrates and birds will be allowed to develop. Perennial Rye Grass or other vigorous amenity/agricultural grass species will not be utilised as they tend to over-dominate the sward and reduce overall biodiversity. The final grassland/wildflower mix for same will be specified by the Project ecologist based on final ground conditions including alkalinity, fertility and moisture levels.

Based on the seed mix utilised and on prevailing ground conditions, the Project ecologist will specify the management regime, including weed control and mowing regime, necessary to maximise biodiversity and habitat value.

c) *The applicant should submit details on the Root Protection Zones for the trees that are remaining close to the car parking spaces for the proposed apartment blocks C & D, including details on how these trees will be protected as per British standard BS5837:2012.*

The root protection zones are shown on Arborcare's Arboricultural Impact Assessment drawings and reports. Protective fencing will be constructed and installed using fencing in accordance with BS5837:2012. The exact detail and location of fencing will be agreed with Cork City Council and the Arboricultural Consultant prior to any commencement of works.

d) *"In respect of tree retention, land development and ecological corridors, the Cork City Development Plan 2022-2028 includes the following:*

- *An objective to support the retention of existing trees and the planting of new trees as part of new developments (Objective 6.5d);*
- *An objective to discourage development proposals necessitating the removal of extensive amounts of trees or hedgerows (Objective 6.9);*
- *The text of the plan further establishes that mature trees and hedgerows shall be identified at the initial stages of the planning process and used to guide site layout and design (Para. 11.212) 'To help protect the city's character, all existing green and blue infrastructure (e.g. mature trees, hedgerows, watercourses, etc) shall be identified at the initial stages of the planning process and used to guide the site layout and design.' and that all development proposals are expected to avoid adverse impacts on mature trees (Para 11.224);*
- *Objective 10.98 Protection of Natural Landscape notes that the City Council will endeavour to discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.*
- *The text of the plan conveys that 'Protecting areas in isolation from each other is neither appropriate nor effective. It is important that significant wildlife habitat*

areas and ecological corridors including rivers and their banks, trees and hedgerows which allow migration of flora and fauna between conservation areas which is essential for the dispersal and genetic exchange of wild species, are protected from inappropriate development and enhanced where possible, working with local stakeholders'. (Para. 4.204)

In this regard it is noted that there is a significant number of trees being removed to accommodate both apartment blocks C & D. This is not considered to be in line with our Cork City Councils strategic objectives on retention of green infrastructure. The objectives and section above need to be met with the emphasis of landscape design on tree retention and keeping ecological corridors for the fauna on site who utilise the site."

The strategy in relation to tree removal and compensatory planting is set out in detail as part of the proposed Landscape Design Rationale. The removal has been minimised, relates principally to non-native modern trees, with retention of higher quality species. The proposals include significant planting to mitigate losses, as well as focused biodiveristy measures and a woodland management strategy to ensure the continual health and renewal of this important landscape and heritage setting. We submit that the proposed approach complies in full with strategic objectives to foster and positively develop green infrastructure in Cork City. Alongside the provision of much needed new homes, the proposed development will function as an integrated vibrant green lung for the wider Mahon community, complete with high quality parkland amenity.

15) *Environmental: Consideration of the proposals to address the following Environment related requirements (as set out in the Environment Report attached in Appendix C):*

(a) *The applicant is requested to submit a Noise Impact Assessment with any planning application*

A Noise Impact Assessment has been completed for the proposed development, as contained in Chapter 11 of the submitted EIAR. No potential for significant noise or vibration impacts has been identified.

(b) *The applicant is requested to submit a Waste and Operational Management Plan for the development with any planning application*

The submitted application includes a Waste and Operational Management Plan by Shipsey Barry.

(c) *The applicant is requested to submit a Construction and Demolition Waste Management Plan for the development with any planning application*

The submitted application includes a Construction and Demolition Waste Management Plan by Egis.

(d) *The applicant is requested to submit energy usage proposals and assessment for the proposed development.*

The submitted Architectural Design Statement includes a Sustainability and Climate Resilience Statement which details proposed energy use requirements and sustainable efficiency initiatives.

16) *There should be no interference with, bridging, draining, or culverting of, any adjacent river or any watercourse, its banks, or bankside vegetation to facilitate the proposed development, without the prior approval of IFI. Full details of proposals relating to same should be provided at application stage including reference to the IFI "Guidelines on protection of fisheries during construction works in and adjacent to waters" document.*

The above comments are noted and will be adhered with. There is no interference with, bridging, draining, or culverting of, any adjacent river or any watercourse, its banks, or bankside vegetation to facilitate the proposed development.

17) *A statement on how the development has considered climate resilience from design to implementation stages.*

The Architectural Design Statement includes a statement on how the development has considered climate resilience from design to implementation stages. It also includes a Building Life Cycle Report.

18) *Scheme Sustainability Statement: As per Cork City Development Plan Sections 11.271-11.273, a Scheme Sustainability Statement should be submitted on how the development has considered climate mitigation and adaptation from design to implementation to operational stages. Carbon reduction, renewable energy on site and electric charging points for cars and bikes should be included within statement. Cork City Development Plan Objective 2.11 Low Carbon Economy and Chapter 11 Climate Action and Environmental Infrastructure should also be considered.*

A scheme sustainability statement has been prepared as part of the Architectural Design Statement. A dedicated chapter on Climate is included in the submitted EIAR. No significant effects have been identified arising from the construction and operational phases.

19) *The site plans should clearly identify all / any wayleaves or rights of way across the application site in accordance with the requirements of the Planning and Development Regulations, as amended.*

Rights of way and wayleaves have been included on the submitted site plans as requested.

20) *An Invasive species management plan should accompany the application where such species are identified within the lands.*

The submitted EIAR includes an Invasive Species Management Plan, as contained in Appendix 9-5.

21) *In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act.*

The application is accompanied by a Statement of Consistency by HW Planning.

22) *The information referred to in article 2998(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2022, unless it is proposed to submit an EIAR at application stage.*

An Environmental Impact Assessment Report (EIAR) has been submitted with the planning application.

23) *An Appropriate Assessment report to assess the impact of the proposed development on the Natura 2000 conservation sites and look at the in-combination impacts of surrounding developments have on the Natura 200 sites.*

(a) *A Natura Impact Statement should the proposed development be screened in to have a significant impact on the Natura 2000 sites.*

An Appropriate Assessment Screening and Stage 2 Natura Impact Statement has been prepared for the proposed development.

(b) *An Ecological Impact Assessment (EcIA) to include all relevant surveys including the additional information recommended by the Biodiversity Officer (See Report in Appendix C) i.e. breeding bird surveys*

Chapter 9 of the submitted EIAR includes a detailed assessment of potential ecological impacts arising from the proposed development. No potential for significant effects has been identified.

(c) *Any necessary alterations to the scheme arising from the surveys and information to be provided above including biodiversity enhancements as recommended by the Biodiversity Officer (See Report in Appendix C).*

The preparation of ecological reporting has had regard to the comments of the Council's Biodiveristy Officer. The design of the proposed development has been shaped by completed survey work. The proposed development will make a positive contribution to biodiversity development in the local area.

24) *Response to Opinion: In accordance with Article 22 (2A)(b), of the Planning and Development Regulations 2001 (as amended), the applicant shall include, as part of a full LRD Application, a statement of response to the issues set out in this opinion*

The subject statement of response meets the above requirements.

03 //

Conclusion

In conclusion, the Council issued opinion (LRD25-10) has been reviewed by the design team. The specific points raised by the Council has been addressed in this statement. While consensus exists that the principle of residential development is appropriate on the subject lands, the Applicant acknowledges that the Council has some differing views in terms of the approach to developing the subject lands. Within this, it is clear from the opinion issued that there are some different thoughts also within the local planning authority regarding certain design elements such as Block C. The Applicant strongly believes that the proposed layout and design is the appropriate one for The Farm, as a key component part of the wider masterplan for the lands. We respectfully request that Cork City Council determine the application based on the design submitted.

Bessborough Estate is an area of unique history and heritage in Cork City. It is long established through the policies of the Council that development can be accommodated in the environs to the north of Bessborough House. The proposed development provides for just this, with a design approach that is carefully considered and will safeguard the value and sensitivity of this particular landscape. This has been shaped by a forensic assessment of the historic landscape context and a review of reinstatement opportunities reflecting the aspirations of the site-specific SE4 objective. It has been shown through the submitted documentation that alongside the provision of much needed new homes in Cork City, the proposed development will restore important historic fabric in Bessborough consistent with policy requirements. The design of the proposal fully respects existing context which has been advanced on the basis of sound, well considered best-practice architectural and landscape principles. It has been demonstrated that the proposed development will not give rise to any adverse impacts, rather it will retain and reinstate historic landscape character.



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ISO 9001:2015
ISO 14001:2015
ISO 45001:2018