



An  
Bord  
Pleanála

## **S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016**

### **Inspector's Report ABP-312222-21**

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#### **Strategic Housing Development**

289 residential units consisting of 201 houses, 88 apartments and all associated site works.

#### **Location**

Lackenroe & Johnstown, Glounthaune, County Cork

#### **Planning Authority**

Cork County Council

#### **Applicant**

Bluescape Limited

#### **Prescribed Bodies**

1. Irish Water
2. An Taisce

#### **Observer(s)**

1. Mary & Brendan O'Riordan
2. Enda Barrett
3. Rachel Barrett & Daniel FitzPatrick
4. David Moore

5. Michael & Catherine Burke
6. David Murphy
7. Edmond Stack & Breda Stack
8. Rosario Power
9. Catherine O'Brien & Ed O'Brien
10. Matt O'Mahony
11. Nora Roche
12. Pat & Alicia McDonald
13. Dr. Jim Murphy
14. Janet Seacy
15. Mary Daunt
16. Jim & Anne Mason
17. Brian Cluer
18. Michael O'Sullivan
19. Bernadette Dennehy
20. Finbarr & Mary Clayton
21. Susan O'Byrne
22. Grainne & Paul Nolan
23. Hilary O'Connell
24. Danny Connell & Judy Connell
25. Joe & Pauline Walsh
26. Simon Bursell
27. Aidan Murphy
28. Enda Murray
29. Eamonn O'Byrne
30. Susan & Evan Norton
31. Councillor Sheila O'Callaghan
32. Michael & Imelda Price
33. Fiona Barry
34. Hugh & Bernice O'Donnell

35. Henry Browne
36. Catherine Neville
37. Ciaran & Catherine O’Riordan
38. Patrick & Hester Forde
39. Claire Casey & Patrick Casey
40. K.M. Springall
41. Pat O’Byrne
42. Ben Long
43. Louise Barrett
44. Niamh & Tony FitzPatrick
45. Niall & Maura Murphy
46. John O’Shea & Siobhan Kelleher
47. Brock Lewin & Claire Cliffe-Lewin
48. Hanne & Freddie Pedersen
49. Morten Pedersen
50. Seamus & Anne Leahy, Mary  
Leahy and James Leahy
51. Sean & Marie Flanagan
52. Emer O’Brien
53. Myles & Collette O’Donnell
54. Madeleine O’Byrne
55. Conor O’Brien
56. Ray Looney
57. Marie, Margaret & Enda Barrett  
C/O Rachel Barrett
58. Richard and Kate Cuddy
59. Iseult O’Connor
60. Susan Law
61. James Buckley
62. Michael Mossop

63. Peter Murphy
64. Patrick Boland
65. Reverend Canon Paul Arbuthnot
66. Robert O'Mahony
67. Ray & Breeda Neville
68. Cora Quinlan
69. Mary D.M. Murphy
70. Kelleher & Associates Ltd. on  
behalf of Mona O'Sullivan
71. James Barrett
72. Annmount Residents C/O Terence  
Fleming – A list of names of the  
residents of Annmount is included.
73. Kevin Hegarty & Regina Murphy
74. Garry Tomlins
75. Eric & Rebecca Wyse
76. Michael & Oonagh Barry
77. Coakley O'Neill Town Planning on  
behalf of Keta Products Ltd. of  
Fitzpatrick's Shop
78. Brendan McGrath and Associates  
on behalf of Glounthaune  
Community Association
79. David Savage
80. Heather Barrett & Michael Fleming
81. Glounthaune Sustainable  
Development Committee C/O  
Glounthaune Community Centre
82. James Hartnett Architectural  
Consultants Limited on behalf of

Points East Designated Activity  
Company

83. Glounthaune Tidy Towns

84. Jesper Pedersen

**Date of Site Inspection**

12<sup>th</sup> March 2022

**Inspector**

Paul O'Brien

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## 1.0 Introduction

This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

## 2.0 Site Location and Description

2.1. The subject site with a stated area of 13.87 hectares, comprises an irregular shaped area of land located to the northern side of Glounthaune, County Cork. The site is located in the townlands of Lackenroe and Johnstown. Glounthaune is located approximately 10 km to the east of Cork City and is a similar distance to Midleton to the east.

2.2. The site projects northwards from a greenway, consisting of a footpath/ cycleway, and goes uphill, crossing the L-2970 road, which is known as 'The Terrace' and continues, widening out towards the top end until it reaches the rear boundary of a row of detached houses. A narrow section continues northwards providing a connection to a narrow public road, L-2969. The subject lands are mostly in agricultural use and are under grass. These are divided up into fields by use of hedgerows. Surroundings lands consist of a mix of agricultural fields and residential primarily in the form of detached houses on their own sites. As stated, the site rises from approximately 3 OD to 110 OD to the north. This rise in slope is over a south to north axis of circa 720 m. The sloped nature of the site provides a prominent feature in the area.

2.3. The proposed primary vehicular access to the site is from the west with a connection through a housing development under construction, referred to as Phase 1 of the applicant's masterplan, and connects to the L-2968 local road.

2.4. To the south of the site is the public road known as Johnstown Close and beyond that is the Cork to Cobh/ Midleton railway line. Beyond that to the south are mudflats associated with a river tributary which flows into to the River Lee.

2.5. The N25 Cork to Waterford road is located south of the tributary/ mudflats associated with the River Lee. The N25 is the main road serving east Cork, but it by-

passes the subject site. Interchanges between the local road network and the N25 are available to the east and west of Glounthaune at Little Island and Carrigtwohill.

2.6. Glounthaune station is located on the junction of the Cork to Cobh/ Cork to Midleton lines. The station was formerly called Cobh Junction but was named Glounthaune in 1994. Off-peak services are one train an hour between Cork and each of Cobh/ Midleton, thereby providing two trains an hour between Glounthaune and Cork Kent and vice versa. Peak hour services are two to each location, thereby providing for four trains an hour between Glounthaune and Cork Kent and vice versa. The journey time between Glounthaune and Cork is given as 11 minutes.

2.7. The train service provides the primary form of public transport in the area with bus services at present being more limited. The following table details the bus routes that serve Glounthaune:

<b>Route no.</b>	<b>Route</b>	<b>Frequency</b>
240	Cork to Cloyne/ Ballycotton	Three serve Glounthaune, out of four per weekday. Three from Cork and two to Cork, serve Glounthaune out of three services on a Saturday. No Sunday services.
241	Cork to Midleton and Trabolgan	Timetable only shows three inbound to Cork City, Monday to Friday. One from Cork and two to Cork on a Saturday. No Sunday services.
260	Cork to Midleton/ Youghal/ Ardmore	Six from Cork and five to Cork on a weekday. Five each way on a Saturday. Four from Cork and three to Cork on a Sunday.
261	Cork to Midleton/ Ballincurra.	One from Cork and two to Cork on a weekday. None on a Saturday. One, only from Cork on a Sunday.



### 3.0 Proposed Strategic Housing Development

3.1. The proposal, as per the submitted public notices, comprises the provision of 289 residential units in the form of houses, duplex, and apartment units, in addition to a creche and all associated site works.

3.2. The following tables set out some key elements of the proposed development:

**Table 1: Key Figures**

<b>Site Area</b>	13.87 hectares gross – 8.7 hectares net
<b>Demolition</b>	1 house and some derelict outbuildings.
<b>No. of Houses</b>	201
<b>No. of Apartments</b>	24
<b>No. of Duplexes</b>	64
<b>Total</b>	<b>289</b>
<b>Density – Total Site Area</b>	33 units per hectare Excludes two replacement houses on lands to the north of 'The Terrace'.
<b>Public Open Space Provision</b>	12.2% of the site
<b>Car Parking – Residential</b>	473
<b>Creche</b>	11
<b>Total</b>	<b>484</b>
<b>Bicycle Parking - Residential</b>	188

<b>Community Facility &amp; Commercial Unit</b>	6
<b>Creche</b>	12
<b>Total</b>	<b>206</b>
<b>Motorcycle Parking - Residential</b>	9
<b>Creche</b>	2
<b>Total</b>	<b>11</b>

**Table 2: Breakdown of Apartments**

<b>Unit Type</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>Total</b>
Number of Persons per Unit	2	4	5	
Number of units	14	7	3	<b>24</b>
% Of Apartments	58%	29%	13%	<b>100%</b>

**Table 3: Breakdown of Duplexes**

<b>Unit Type</b>	<b>1 Bedroom Ground Floor Apartment</b>	<b>2 Bedroom Duplex Apartment</b>	<b>2 Bedroom Ground Floor Apartment</b>	<b>3 Bedroom Duplex Apartment</b>	<b>Total</b>
Number of Persons per Unit	2	4	3	5	
Number of units	27	27	5	5	<b>64</b>
% Of Apartments	42%	42%	8%	8%	<b>100%</b>

**Table 4: Breakdown of Houses**

<b>Unit Type</b>	<b>3 – 4 Bed – Detached</b>	<b>4 Bed – Semi-detached</b>	<b>4 Bed – Townhouse</b>	<b>3 Bed- Semi-detached</b>	<b>3 Bed – Townhouse</b>	<b>2 Bed Townhouse</b>	<b>Total</b>
Number of Persons per Unit	5,6,7	7	7	5-6	5	4	
Number of units	8	44	12	22	49	66	201
% of Houses	4%	22%	6%	11%	24%	33%	100%

The proposed development includes:

- A creche with capacity for 67 children and associated play area.
- A community unit with an internal area of 102.1 sq m.
- A commercial unit with an internal area of 69.2 sq m.
- The demolition of an existing derelict house with a stated floor area of 142.8 sq m.
- Vehicular access to be provided from ‘The Terrace’ and emergency access is from a local road (L-2969) to the north of the site, and a right of way from the west of the site over a road (L-2968) permitted under PA Ref. 17/5699/ ABP Ref. 300128-17.
- All associated site works, infrastructure provision and amenity lands.

3.3. The application was accompanied by various technical reports and drawings, including the following:

- Statement of Consistency - HWP
- Material Contravention Statement – HWP
- Planning Statement and Response to Board Opinion - HWP
- Architectural Design Statement – Deady Gahan Architects (DGA)
- Universal Design Statement – Deady Gahan Architects (DGA)
- Housing Quality Assessment – Deady Gahan Architects (DGA)
- Letters of Consent from Cork County Council, Fintan & Valerie Coleman, and Bluescape Limited.
- Part V Costs Methodology - HWP
- Community & Social Infrastructure Assessment - HWP
- Arboricultural Survey – Dermot Casey Tree Care
- Arboricultural Champion and Heritage Tree Report – Tree Management Services
- Landscape Design Rationale – Cunnane Stratton Reynolds
- Tree Survey Report – Arbor Care
- Infrastructure Report – AECOM
- Outline Construction and Demolition Waste Management Plan – AECOM
- Outline Construction & Environmental Management Plan – AECOM
- Site Specific Flood Risk Assessment – AECOM
- Stage 1 Road Safety Audit – Bruton Consulting Engineers
- Statement of Compliance with DMURS– AECOM
- Constraints Study 1 - Site Permeability – AECOM
- Constraints Study 2 - Site Layout – AECOM
- Site Lighting Design Proposal – AECOM
- Building Lifecycle Report – Aramark
- Natura Impact Statement for a Proposed Residential Development at Lackenroe, Glounthaune, Co. Cork – Kelleher Ecology Services/ Croft Ecology

- Environmental Impact Assessment Report & Non-Technical Summary – AWN Consulting, AECOM, Cunnane Stratton Reynolds, DG Architects, John Cronin & Associates, Kelleher Ecology Services, MHL and HWP.

## 4.0 Planning History

### Subject site – Northern Section:

**P.A. Ref. 07/9457/ ABP Ref. PL04.225634** refers to a March 2008 decision to refuse permission for the construction of 29 houses with 29 outhouses, ESB substation, ancillary landscaping including a local play area and associated site works.

A single reason for refusal was issued as follows:

‘The appeal site is located in an area zoned O-01 for which the zoning objective is for ‘open space, sports, recreation and amenity’ use as set out in the Blarney Electoral Area Local Area Plan, September 2005. This zoning objective is considered reasonable. Notwithstanding the low density of housing proposed, it is considered that the proposed development consisting of a residential estate would contravene materially the zoning objective for the site and would, therefore, be contrary to the proper planning and sustainable development of the area’.

**P.A. Ref. 08/10104/ ABP Ref. PL04.233576** refers to a May 2009 decision to refuse permission for the demolition of 2 habitable houses and 2 outbuildings and to construct 10 houses, ancillary landscaping, and all associated site works.

A single reason for refusal was issued as follows:

‘The proposed development provides two access points onto a narrow road at a point where there are no footpaths, cycle paths or public lighting and where it has not been demonstrated that safe sight distances are available for vehicles entering or exiting the site. The development as proposed would give rise to additional traffic turning movements on this substandard road and generate conflicts with pedestrians and cyclists and would, therefore, by itself and the precedent it would set along this unimproved road, endanger public safety by reason of traffic hazard’.

**P.A. Ref. 17/5699/ ABP Ref. 300128-17** refers to a May 2018 decision to grant permission for a residential development of 31 no. 2 storey dwellinghouses and all ancillary site development works. A total of 40 units were applied for and 9 were omitted by condition, with replacement dwellings to be single storey and to be applied for under a separate application. The proposed development makes provision for the upgrade of the Knockraha road and access to the proposed development will be via a proposed signalised junction with Cois Chuain, with a pedestrian access to the country road to the north of the site. Permission Note: This development/ proposed road would provide access to the subject site from the west and onto the L-2968 local road.

**P.A. Ref. 18/6312** refers to a December 2018 decision to grant permission for the construction of 7 no. single storey dwellings and all ancillary site development works. The proposed dwellings will be accessed via the entrance and access road of the residential development permitted by An Bord Pleanála reference 300128-17 and Cork County Council reference 17/5699.

**P.A. Ref. 19/5659/ ABP Ref. 305398-19** refers to a March 2020 decision to refuse permission for the construction of 55 no. dwelling houses and all ancillary site development works. Change of plan from that permitted under 17/5699 and amended by reference 18/6312.

Two reasons for refusal were issued as follows:

- '1. Having regard to the infrastructural improvements required to provide safe connectivity for pedestrians, cyclists and motorists, to the village centre and to the railway station, it is considered that the proposed development would be premature pending the determination by the planning authority of a road improvement works scheme for the area.
2. Having regard to density, it is considered that the proposed development would be contrary to the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), issued to planning authorities under

Section 28 of the Planning and Development Act, 2000, and to the provisions of the National Planning Framework (2018). The site of the proposed development is on serviceable lands, within the development boundary of Glounthaune, which is designated as a Key Village within the Metropolitan Cork area, where the objective of the Cobh Municipal District Local Area Plan 2017-2023 is to secure a significant increase in the population of the settlement. It is considered that the proposed development would not be of a sufficiently high density to provide for an acceptable efficiency in serviceable land usage, and that the low density proposed would be contrary to the Ministerial Guidelines, which indicate that net densities less than 30 dwellings per hectare should generally be discouraged in the interest of land efficiency. Furthermore, it is considered that the proposed development would be contrary to the National Planning Framework which aims to achieve compact growth through effective density and consolidation rather than more sprawl of urban development. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

In deciding not to accept the Inspector's recommendation to grant permission, the Board considered that the additional traffic associated with the proposed development would endanger public safety by reason of traffic hazard and would lead to conflict between road users, that is, vehicular traffic, pedestrians and cyclists. Furthermore, it is considered that the proposed development would be contrary to the national planning policy which aims to achieve compact growth through effective density and consolidation rather than more sprawl of urban development'.

**Subject site – Southern Section:**

**Ref. ABP-301197-18** refers to a May 2018 decision to grant permission for 174 no. residential units, crèche, doctor's surgery, provision of landscaping and amenity areas, provision of pedestrian/cyclist facilities lanes along L3004 public road connecting to Glounthaune rail station/village centre, new link/distributor road

connecting L3004 with adjoining lands to north-west and associated works to the south eastern side of Glounthaune.

**P.A. Ref. 07/8354** refers to a January 2008 decision to refuse permission for a residential development of 28 no. apartments comprising of 24 no. two bed apartments and 4 no. three bed apartments, bin storage and associated site works and services.

**P.A. Ref. 08/7900** refers to a November 2008 decision to refuse permission for a five-storey building containing 28 no. apartments, site entrance, car park, children's play area, bin store, and revisions to a currently disused access road.

**Total Units granted since 2017 – Adoption of Cobh Municipal District Plan:**

<b>File Number</b>	<b>Date of Grant</b>	<b>Number of Units</b>
P.A. Ref. 17/5699/ ABP Ref. 300128-17	May 2018	31
ABP-301197-18	May 2018	174
P.A. Ref. 18/6312	December 2018	7
<b>Total Granted:</b>		212

## 5.0 Section 5 Pre-Application Consultation

5.1. A Section 5 Pre-Application Consultation took place on the 21<sup>st</sup> of June 2019; Reference ABP-304468-21 refers. Representatives of the prospective applicant, the Planning Authority – Cork County Council and An Bord Pleanála attended the meeting. The scheme as described was for the development of 301 residential units (151 houses and 150 apartments), a creche, community facility and all associated site works at Lackenroe and Johnstown, Glounthaune, Co. Cork.

5.2. An Bord Pleanála was of the opinion having regard to the consultation meeting and the submission of the Planning Authority, that the documents submitted with the request to enter into consultation would require further consideration and amendment to constitute a reasonable basis for an application for a strategic



housing development. Furthermore, pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant was notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Further consideration of the documentation as it relates to the provision of access for the proposed development having regard to the need to provide safe and convenient pedestrian and cycle connections to the railway station and other services in Glounthaune and the nature and extent of works to public roads that can be authorised by a grant of permission under Part III of the Planning and Development Act 2000, as amended.
2. Further consideration of the documentation as it relates to the design and layout of the proposed development, having regard to the need to provide a high-quality residential environment that facilitates social interaction and movement on foot, while respecting the topography of the site and the residential amenities of neighbouring properties.
3. An EIAR or EIA screening report, as necessary, which should have regard to the thresholds at 10(b)(i) and (iv) of Part 2 of Schedule 5 to the Planning and Development Regulations 2001, as amended, as well as to Schedules 7 and 7A to those regulations. The submitted documentation should, inter alia, fully describe the ground works required to carry out the proposed development and their potential for significant effects on the environment.
4. An Appropriate Assessment (AA) screening report or Natura Impact Statement (NIS), as necessary.
5. Information regarding the capacity of the social and physical services in Glounthaune to accommodate the demands that would arise from the proposed development.
6. A phasing scheme for the development which would indicate how open space and access for the proposed housing would be provided in a timely and orderly manner.

7. A report demonstrating compliance with the applicable standards set out in DMURS and the National Cycle Manual in relation to the proposed housing and the works to public roads.
8. A housing quality assessment which provides the specific information regarding the proposed apartments required by the 2018 Guidelines on ABP-304468-19 Pre-Application Consultation Opinion Page 3 of 4 Design Standards for New Apartments. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements. A building lifecycle report for the proposed apartments in accordance with section 6.13 of the 2018 guidelines should also be submitted.
9. A Site-Specific Flood Risk Assessment Report. The prospective applicant is advised to consult with the relevant technical section of the planning authority prior to the completion of this report which should describe this consultation and clarify if there are any outstanding matters on which agreement has not been reached with regard to surface water drainage.
10. Details of proposed boundary and surface treatments throughout the development, and of landscaping and planting.
11. A tree survey, including details of trees to be retained or removed.
12. A draft construction management plan.
13. A draft waste management plan.

5.3. Finally, a list of authorities that should be notified in the event of the making of an application were advised to the prospective applicant and which included the following:

1. The Minister for Culture, Heritage, and the Gaeltacht, (in relation to nature conservation)
2. The Heritage Council (in relation to nature conservation)
3. An Taisce (in relation to nature conservation)
4. Irish Water

## 5.4. Applicant's Statement

5.4.1. A document titled 'Planning Statement and Response to Board Opinion, ABP-304468-19' prepared by HWP was submitted with the application as provided for under Section 8(1)(iv) of the Act of 2016.

The following information was provided in response to the opinion:

### **Item 1 – Access to and from the site and the railway station and the extent of works possible to public roads:**

No concerns were raised by the Board in relation to the density and number of units proposed, but it was highlighted that there was a need to consider a revised strategy for pedestrian/ cycle connectivity to the train station/ other services in Glounthaune. Particular reference was made in the Tripartite meeting to 'The Terrace' and lands to the south of the site and north of Johnstown Close in relation to pedestrian/ cycle connectivity.

Subsequent acquisition of lands has enabled the development of a revised development strategy and the ability to provide a direct route to the station/ centre of Glounthaune. Whilst there are significant benefits in the provision of this direct route, challenges exist in the form of topography, landscape, visual and cultural heritage considerations. These constraints/ challenges have been fully considered and the connectivity proposal is informed by the following:

- Site Constraints Report by AECOM (Appendix 3-2 of the EIAR)
- Arboricultural Survey by Dermot Casey Tree Care (Appendix 4-1 of the EIAR)
- Arboricultural Report by Arborcare (Appendix 4-2 of the EIAR)
- Arboricultural Tree Report by Tree Management Services (Appendix 4-3 of the EIAR)
- Site Investigation Report – Priority Geotechnical Limited (Appendix 4-3 of the EIAR)
- Natura Impact Statement – Kelleher Ecology Services (Appendix 7-1 of the EIAR)
- Historic Landscape Impact Assessment – Louise Harrington Architectural Heritage & Historic Landscape Consultant (Appendix 11-2 of the EIAR)

- Biodiversity Chapter of the EIAR by Kelleher Ecology Services
- Cultural Heritage Chapter of the EIAR by John Cronin & Associates

Details have been agreed in principle with Cork County Council in relation to the provision of pedestrian/ cycle facilities/ upgrades to existing sustainable transport routes. A summary of the works is provided, and the proposed route is considered by the applicant to be an appropriate solution.

**Item 2 – Design and layout to ensure a high quality of residential development:**

The design and layout of the proposed development has evolved since the Tripartite meeting and is detailed in the Architectural Design Statement prepared by Deady Gahan Architects. This architectural statement provides full details on the design rationale and how the existing residential amenity of adjoining properties will be protected. Also, full regard is had to the existing topography of the subject site and that of the adjoining lands.

**Specific Requested Information:**

**Item 1 – EIAR or EIA Screening:**

An EIAR has been prepared and submitted with the application, as the development site area exceeds the 10-hectare threshold for an urban area.

**Item 2 – AA Screening Report or NIS:**

A NIS has been prepared by Kelleher Ecology and comprehensively evaluates the potential impact on the qualifying interests of the adjoining SAC and SPA. The implementation of suitable mitigation measures will ensure that there are no residual impacts and that the proposed development will not adversely impact on the integrity of the Great Island Channel SAC and the Cork Harbour SPA.

**Item 3 – Capacity of Social and Physical Services in Glounthaune:**

HW Planning (HWP) have prepared a ‘Community and Social Infrastructure Assessment’. Existing and proposed facilities, which are available in the area, are listed in this submitted assessment under the following headings:

- Amenity, Open Space and Sports
- Childcare and Education

- Community Facilities
- Retail Services
- Health
- Emergency
- Public Transport

**Item 4 – Phasing Scheme to indicated when Open Space will be provided:**

A phasing strategy has been prepared by Deady Gahan Architects and is presented on Drawing No.20151/P/009. The first phase of the development is proposed to start in the northern parcel of lands, which follows that under construction on the lands to the west of the site, permitted under a separate application. The pedestrian/ cycle route/ upgrades to ‘The Terrace’ and the construction of the creche will take place in phase 1 of the proposed development.

**Item 5 – Compliance with DMURS and National Cycle Manual:**

AECOM have prepared a ‘Statement of Compliance with DMURS’ and this is in addition to Drawing No. 20151/P/014 prepared by Deady Gahan Architects which demonstrates how the proposed development complies with the standards set out in DMURS and the National Cycle Manual.

**Item 6 – Housing Quality Assessment (HQA):**

Deady Gahan Architects have prepared a HQA and a ‘Building Life Cycle Report’ has been prepared by Aramark and which is in accordance with the ‘Sustainable Urban Housing Design Standards for New Apartments’.

**Item 7 – Site Specific Flood Risk Assessment:**

A Site-Specific Flood Risk Assessment has been undertaken by AECOM and is provided in support of the application. It is found that the site is not at risk from a 1 in 1000-year coastal event, is located within Flood Zone C in terms of fluvial flooding, thereby negating the need for a Justification Test and no instances of pluvial flooding were found on site.

**Item 8 – Boundary, Surface Treatment and Landscape Details:**

Full details are provided in the Landscape Design Rationale prepared by Cunnane Stratton Reynolds. These details are supported with photomontages and CGI’s

prepared by GNET and which also demonstrate how the proposed development will integrate with the existing Glounthaune area.

### **Item 9 – Tree Survey:**

Full details are provided in the form of an Arboricultural Survey by Dermot Casey Tree Care (Appendix 4-1 of the EIAR), an Arboricultural Report by Arborcare (Appendix 4-2 of the EIAR) and an Arboricultural Tree Report by Tree Management Services (Appendix 4-3 of the EIAR). In addition, a Tree Removal Plan, Heritage Tree Plan and a Landscape Masterplan have been prepared in support of the application. The Southern portion of the site is important from a landscape and cultural heritage perspective due to its association with Ashbourne Gardens, located to the east. The Arboricultural Tree Report highlights that the southern site is in a neglected state and has suffered a considerable loss of trees over the years. 87 trees were identified in the southern portion of the site, three of which were considered to be High Quality – Class A and 16 were considered to be Class B. 23 Heritage Trees and three likely Champion Trees were also identified. The northern portion of the site included a total of 297 trees, 25 of which were Category A and 181 Category B. The proposed development will result in the removal of the following:

- 593 metres of hedgerow
- 4 Heritage trees identified as Category A – 25 Category A trees are retained.
- 4 Heritage trees identified as Category B
- 56 Category B trees – 201 Category B trees are to be retained.
- 57 Category C trees.
- 16 Category U trees, these are considered to not be of value and some of which are dead.

No Champion trees are to be removed, 15 of the 23 heritage trees are to be retained. 8 replacement trees will be planted, these to be of the same species as those to be removed. Mitigation planting will ensure that more hedgerow is planted than is to be removed from the site. In total, 800 linear metres of hedgerow are to be planted, 656 trees, 316 woodland planting whips and 8 replacement heritage trees are proposed. The EIAR assessed the impact on the landscape, the northern section is deemed to be neutral and the effect on the southern section is deemed to be significant. The proposed mitigation measures in the form of replanting will

improve the setting over time. The proposed pedestrian/ cycle route through the site to/ from the station will benefit all who use the route. The proposed development will also allow for access to the former Beamish Garden, and grotto. The applicant considers that the felling of trees is justified when considering the overall benefits that accrue from the proposed development of this site.

**Item 10 – Draft Construction Management Plan:**

A Construction and Environmental Management Plan has been prepared by AECOM and is submitted with this application.

**Item 11 – Draft Waste Management Plan:**

A Construction and Demolition Waste Management Plan has been prepared by AECOM and is submitted with this application.

A ‘Statement of Consistency’ has been prepared by HWP and which details how the proposed development complies with national, regional and local policies/ objectives.

A ‘Statement of Material Contravention’ has also been prepared by HWP. The following are referred to in this statement:

- The development provides for more than 40 units as required under Objective GO-01 of the current Local Area Plan.
- The proposed development would cumulatively with other permitted developments exceed the target figure of 400 units in Glounthaune – Objective GO-01.
- The development exceeds suggested densities for villages as set out in the Cork County Development Plan 2014 – 2020.
- There is an under provision of car parking contrary to the requirement of the Cork County Development Plan 2014 – 2020.

**Conclusion:**

The applicant has submitted the above details to provide the additional documentation as raised by An Bord Pleanála. The site is considered to be suitable for the proposed development through its location on the Cork to Cobh/ Midleton railway lines. The development demonstrates compliance with national and regional guidance.

## 6.0 Relevant Planning Policy

### 6.1. National Policy

#### 6.1.1. Project Ireland 2040 – National Planning Framework (NPF)

**Chapter 4** of the National Planning Framework (NPF) is entitled ‘Making Stronger Urban Places’ and it sets out to enhance the experience of people who live, work and visit the urban places of Ireland.

A number of key policy objectives are noted as follows:

- National Policy Objective 4 seeks to ‘Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being’.
- National Planning Objective 11 provides that ‘In meeting urban development requirements, there be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth’.
- National Planning Objective 13 provides that “In urban areas, planning and related standards, including, in particular, height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected”.

**Chapter 6** of the NPF is entitled ‘People, Homes and Communities’ and it sets out that place is intrinsic to achieving a good quality of life.

A number of key policy objectives are noted as follows:

- National Policy Objective 27 seeks to ‘Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising



walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages’.

- National Policy Objective 33 seeks to ‘Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location’.
- National Policy Objective 35 seeks ‘To increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights’.

#### **6.1.2. Section 28 Ministerial Guidelines**

The following is a list of Section 28 - Ministerial Guidelines considered of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- Urban Development and Building Heights - Guidelines for Planning Authorities – (DoHPLG, 2018).
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (DoHPLG, 2020).
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual) (DoEHLG, 2009).
- Quality Housing for Sustainable Communities (DoEHLG, 2007).
- The Planning System and Flood Risk Management including the associated Technical Appendices (DEHLG/ OPW, 2009).
- Childcare Facilities Guidelines for Planning Authorities (2001).
- Regulation of Commercial Institutional Investment in Housing – Guidelines for Planning Authorities (2021).

#### **Other Relevant Policy Documents include**

- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020.
- Design Manual for Urban Roads and Streets (2013).

- Permeability Best Practice Guide – National Transport Authority.

## **6.2. Regional Policy**

### **6.2.1. Regional Spatial and Economic Strategy for the Southern Region**

The Regional Spatial and Economic Strategy (RSES) for the Southern Region provides for the development of nine counties (The Six Munster Counties plus Wexford, Carlow, and Kilkenny) including the Cork County area, and supports the implementation of the National Development Plan (NDP). Cork City and suburbs is the largest settlement in the Region with a population of over 208,000. Cork City is one of three cities categorised as Metropolitan Areas. Glounthaune is located within the designated metropolitan area. The only specific reference to Glounthaune is under section 6.3.6.3 – ‘Transport Priorities for the Cork Metropolitan Area’ and reference to the improvement of the commuter rail network in the area to include upgrades to existing stations such as Glounthaune.

## **6.3. Local/ County Policy**

### **Cork County Development Plan 2014 - 2020**

6.3.1. The Cork County Development Plan 2014 - 2020 is the current statutory plan for the Cork County area, and which includes the subject site. Chapter 2 sets out the Core Strategy for the development of County Cork.

### **Cobh Municipal District Local Area Plan 2017**

6.3.2. Glounthaune is listed as a Key Village in this Local Area Plan (LAP). In 2015 there were 506 houses in Glounthaune. Glounthaune is located on the Cork to Cobh/ Middleton railway lines. The Wastewater Treatment Plant at Carrigrennan, Little Island serves the Glounthaune area.

6.3.3. The Role of Key Villages is set out in Section 4.2 of the LAP. Key Villages are to be the ‘primary focus for development in rural areas in the lower order settlement network and allows for the provision of local services, by encouraging and facilitating population growth at a scale, layout and design that reflects the character of each village, where water services and waste water infrastructure is available’. A list of

facilities that would normally be found in Key Villages is provided in Section 4.2.4.

Section 4.2.7 states the following:

‘There is scope for development within the Key Villages, however, it is important that each village’s rural character, architectural heritage and its other heritage and natural amenities are maintained, enhanced and not compromised’.

6.3.4. Under Section 4.2.10 it is stated that ‘It is an aim to ensure that the scale of new residential development in the key villages will be in proportion to the pattern and grain of existing development’. Table 4.2.1 provides the ‘Appropriate Scale of Development for Key Villages’ and an additional 400 houses could be provided in Glounthaune at the ‘Normal Recommended Scale of Any Individual Scheme’ of 40 units. The following is also stated in relation to table 4.2.1:

‘The normal recommended scale of any individual scheme is set out in the above table. Individual schemes in excess of the recommended scale set out in the above table may be considered where it is demonstrated that the overall scheme layout reinforces the existing character of the village and the scheme is laid out, phased, and delivered so as not to reflect a residential housing estate more suited to a larger settlement’. General Objectives for Key Villages are provided under Objective GO-01 of the LAP.

6.3.5. Full details on the development of Glounthaune are provided in Section 4.5 of the LAP. The vision seeks to secure a significant increase in the population up to 2023, ensuring that a balance is provided between maximising the benefits of the railway service with development that is appropriate to the character, setting and the scale of the existing village. The topography of Glounthaune is recognised as a significant feature and ‘most of the undeveloped lands within the boundary are very visually sensitive’. Section 4.5.8 states, ‘It is considered that new development in Glounthaune over the next ten years should not exceed 400 units in total’ and ‘It is considered that any new individual housing schemes should not normally exceed 40 units (see footnote of Table 4.2.1).

6.3.6. The subject lands are located on lands within the ‘Settlement Boundary’. Two general objectives apply to Glounthaune:

‘DB-01: a) To encourage the development of up to 400 additional dwelling units up to 2023;

- b) To implement traffic calming measures in the village which include the proper demarcation of the road edge and car parking spaces;
- c) To achieve the development of a car park in close proximity to the railway station.

DB-02: Glounthaune is located adjacent to the Great Island Channel Special Area of Conservation and the Cork Harbour Special Protection Area. Development in this settlement will only be permitted where it is shown that it is compatible with the requirements of the Habitats Directive and the protection of these sites’.

## **7.0 Third Party Observations**

7.1. A total of 84 submissions were received.

A submission was made by the Glounthaune Sustainable Development Committee, Glounthaune Tidy Towns, Points East Designated Activity Company, Annmount Residents, Councillor Sheila O’Callaghan, Reverend Canon Paul Arbuthnot, and other submissions were from individual members of the public.

The submissions from residents/ members of the public, grouped under appropriate headings, can be summarised as follows.

### **7.1.1. Proposed Development:**

- The proposal is considered to be not fit for purpose and not suitable for this site.
- It would be difficult to set up a management company for this development.
- The Village of Glounthaune is in a very constrained area between the road/ railway line and the estuary but is limited in the services it can/ does provide.
- The proposed development will result in the loss of the rural character of Glounthaune.
- The development does not demonstrate compliance with the ‘Best Practice Urban Design Manual – May 2009’.

- The proposed development of Glounthaune will result in a population similar to other towns in Co. Cork (Bantry and Kanturk is referenced) but will not have the same facilities/ services as these towns.
- The proposed naming strategy is not acceptable; the names have no relevance to their location.
- The area is characterised by single storey units, not the two-storey units that this development proposes.
- The proposed design does not take advantage of the views that should be afforded to future residents of the development.
- The development should be less dense where it interacts with neighbouring boundaries/ sites.
- Proposed open space areas are heavily planted and may not be suitable for their intended use. Some of these open space areas are not suitably overlooked.
- Request that the public realm for the proposed development be carefully assessed.

#### **7.1.2. Traffic/ Car Parking:**

- The proposed development will result in increased traffic in the area.
- Potential for over 1,000 car trips per day due to the proposed development.
- Congestion will increase at the junction with Johnstown Close, the main road to the south.
- Traffic has increased under the Dry Bridge due to existing development in the area and this proposal will only add to this issue.
- Concern about the structural stability of the dry bridge. Also concern that it may be damaged by construction vehicles.
- Concern that the existing road network will not be able to cope with the construction traffic associated with the development of this site.

- No investment has been made to the local road network for many years and cannot cope with the additional traffic.
- No allocated car parking is provided for the apartments which is a serious omission when parking is at such a premium.
- The single access to the site for traffic is not acceptable.
- There is a lack of charging facilities for e-vehicles.
- The proposed emergency services access is not adequate to serve this development.
- A detailed traffic plan/ traffic impact assessment has not been provided in support of the application.
- The carrying out of the traffic survey during the pandemic does not give a true reflection of traffic in the area.
- The proposed development is premature pending the adoption of the new Cork County Development Plan and the associated flood risk assessment for Glounthaune.

#### 7.1.3. **Sustainable Transport Issues:**

- Residents will not use the train due to the long walk and the fact that the proposed pedestrian route is very steep.
- Walk times to the station could be in the order of 20 minutes downhill and 40 minutes uphill.
- The car will continue to be the primary form of transport here.
- Difference in levels of 100 m from the south to the north of the site.
- This is a car dependent development.
- The railway will only benefit those who work in Cork City Centre.
- The car park at the railway station is often full.

- There are no footpaths on many of the routes to the school, shop and railway station and due to the narrow widths of the roads, it would be difficult to provide such footpaths.
- Concern that part of the Ashbourne Greenway, on which public money was spent, would be used to facilitate a private development.
- Residents will not be using the train on a daily basis as they will be working from home a couple of days a week due to the hybrid work model that has become popular in recent times.
- A shared workspace location/ hub could be provided here to facilitated those working from home.
- The proposed development does not demonstrate compliance with the '10 minute principle' and the proposed development results in a convoluted layout.
- The proposed development will exclude the elderly who may not be able to walk up and down the sloped streets/ pathways.
- There is a need for suitable flood mitigation measures to be put in place for the train station.
- The promotion of cycling is unrealistic, again when having regard to the topography of the site. The fitting of bike wheeling ramps to the flights of stairs demonstrates the limited potential for cycling within this development.
- The 40% modal shift that is proposed is unsubstantiated.
- The proposed improvements to the Cork Bus Network will only see a bus serving Glounthaune every 30 minutes, which does not demonstrate a high quality of public transport.

#### **7.1.4. Density, Design and Height:**

- The site is not zoned for residential development in the current Local Area Development Plan.

- The development contravenes the Local Area Plan – the proposed development combined with permitted schemes would exceed the 400 units proposed for Glounthaune.
- Material contravention of the Local Area Plan due to the number of units proposed and the fact that the 400-unit provision will be exceeded.
- The proposed density is too high for this area.
- The development will have a negative impact on the visual setting of the site/ surrounding area.
- The development will negatively impact on a scenic route – the S42 which runs along the L-2969 road.

#### **7.1.5. Drainage/ Flooding:**

- There is a concern that the proposed development may give rise to increases in runoff water and which in turn could give rise to flooding/ water damage to existing properties. Incidences of where this has occurred due to recent developments have been provided in a number of the submissions, with photographic evidence provided in a number of cases.
- There is a concern that the development may impact on the existing wastewater system serving this area.
- There is a need to establish that the existing system can cater for the scale of development proposed here.
- The provision of a water pipe in the area in the past has resulted in ongoing issues with the road and the pipe leaks on a regular basis.

#### **7.1.6. Lack of Facilities:**

- There is already a shortage of school places in the area and the proposed development will add to traffic congestion at the existing school, thereby adding to a potential traffic issue.
- A number of the submission list the facilities/ services that have been lost in Glounthaune over the years.



- There is no secondary school in the area.
- There is only one shop serving Glounthaune at present. The nearest supermarket is 5 km away from this site.
- The GAA club is already full to capacity, and it cannot expand.
- There is a lack of recreation facilities to serve the local area.
- There is a need for outdoor and indoor sports facilities.
- Shortage of GPs in the area.

#### **7.1.7. Impact on Residential Amenity:**

- Concern about loss of privacy due to the proposed development. Potential for overlooking from the proposed units.
- Potential loss of light to existing houses as a result of the proposed development.
- Potential for overbearing on existing houses in the area.
- Existing residential amenity has been adversely affected by development in the area and this proposal will only add to such issues. Noise, dust, traffic, light pollution, disturbance, and nuisance were all raised as issues of concern.
- Potential for light spillage from the proposed public lighting of this site.
- Concern that existing residents may have to leave Glounthaune due to the impact of the proposed development.
- Potential impact to the existing boundary wall with Annmount Orchard; the wall forms part of the boundary of a protected structure.
- Works underway on the adjoining site are having a negative impact on this boundary wall.
- Potential issues of trespass onto adjoining sites.
- Potential for anti-social behaviour and there is no evidence that the Garda were consulted about this development.
- A number of requests for boundary walls to be conditioned to be provided between the subject lands and third-party lands.

#### **7.1.8. Impact on the Character of the Area:**

- The Dry Bridge is an important feature of Glounthaune.

- Request that the lands at Ashbourne House be protected in the interest of heritage, biodiversity and community reasons.
- Loss of trees and biodiversity impact will be significant.
- Concern about the potential for negative impact on Harper's Island Wetlands.
- Ensure that the development does not impact on existing water quality in the area.
- A suitably detailed Visual Impact Study should be carried out to ascertain the impact of this development on this highly valuable landscape.

#### 7.1.9. **Other Comments:**

- Legal issues over covenants and restrictions that apply to the development of these lands. Junior Council legal opinion is currently being sought by the observers in relation to these issues (M. Barrett, M. Barrett and E. Barrett).
- Recognised that there is a housing shortage, and that ribbon development should be avoided, but this should be done in a sustainable and proportionate way.
- Fire safety concerns in relation to proposed material finishes to be utilised in this development.
- Concern about who will manage the open spaces into the future, no evidence that Cork County Council will take them in charge.
- Glounthaune has lost many amenities over the years and this development does not increase the range of amenities/ facilities that would be available.
- The Non-Technical Summary included with the EIAR states that the development will have a negative impact on the historic structure (Annmount) during the operational phase.
- The proposed development will result in the loss of the existing public footpath for use by cars which are to access the development.
- Concern that the proposed development would negatively impact on the Ashbourne Pond which is an important natural amenity that is available to the public.
- Construction traffic should be moved away from existing houses.

- Existing houses should be cleaned and repainted by the applicant after the development is complete.
- Concern about the construction works ongoing on the adjoining site. Particular references to the hours of operation and the stacking of earth on the site.
- The site would be more suitable as a Primary Care Centre.
- Concern about anti-social behaviour due to the proposed development is raised in a number of the submissions.
- Query over the accuracy of some of the submitted plans and supporting details.
- A number of conditions are recommended in the event that permission is granted for this development.

Supporting information has been provided in the form of plans, photographs, photomontages, video clips, etc.

## **8.0 Planning Authority Submission**

8.1. The Chief Executive's report, in accordance with the requirements of section 8(5)(a) of the Act of 2016, was received by An Bord Pleanála on the 22<sup>nd</sup> of February 2022. The report states the nature of the proposed development, background details including preplanning, site description, planning history, details of submissions/ observations, the Chief Executive's views on the proposed development, a Chief Executive's recommendation and an appendix that includes the reports from internal departments of Cork County Council.

8.2. The Chief Executive's report includes a summary of the views of the elected members of the Municipal District Meeting held on the 8<sup>th</sup> of February 2022, and these are outlined as follows:

- Unanimous objection to the scale of development on a steeply sloping site.
- Traffic concerns due to the narrow roads and the volume of traffic that will result from this development. Particular reference is made about the use of the road in the area of the 'dry bridge'.
- Lack of suitable social infrastructure in the area.
- Concern about the scale rather than the proposed density of development.

- The proposed walkway/ cycle way that links the site to the railway station is not suitable due to the gradients on site.
- Concern about the loss of significant trees on site.
- Welcome for the mix of housing types, but concern expressed about the potential impact on existing services in the area.
- The useability of the proposed green spaces is queried due to the fact that these are to be heavily planted and would not therefore be useable by children as play areas. Concern also about the long-term maintenance of these spaces.
- Concern expressed about the Strategic Housing Development system.

8.3. A list of submission/ observation points is provided in Section 3.1.1 of the submitted CE report. In addition, comments made by An Taisce are summarised under Section 3.2.1 and a submission from Irish Water under 3.2.2. An Taisce raised concerns regarding Infrastructure Capacity and the impact of the development on the curtilage of Ashbourne House and Gardens.

8.4. The key items identified in the CE report are summarised under the following headings:

**EIAR:**

- An EIAR is included with the application and is required due to the site area at 13.87 hectares.

**Principle of the development and compliance with the Cork County**

**Development Plan and Local Area Plan:**

- Glounthaune is designated as a 'Key Village' within the Metropolitan Cork area and under the Cobh Municipal District LAP. The site is located within the settlement of Glounthaune and is zoned existing built-up area. The vision for Glounthaune is for a significant increase in the population through maximising the benefit of the railway station whilst ensuring that development is appropriate to the character, setting and scale of the village, ensuring the retention/improvement of local services/ facilities and to strengthen infrastructure provision.

- The Local Area Plan seeks to encourage the development of up to 400 additional units, this is not a target to be reached or a maximum limit on development. The LAP also states that any single development should not normally exceed 40 units, though this figure may be exceeded where the development can successfully integrate with the existing form of development in place but should not reflect a housing estate that would be suited to a larger settlement. It is accepted though that consideration may be given to a development that is greater than 40 units.
- The LAP notes that in 2015 the number of units in Glounthaune was 506 and since the adoption of the LAP in August 2017, a further 232 units have been granted planning permission. Combined with the current proposal, a total of 521 would be permitted. The Planning Authority recognise the growth figure of 400 units in the LAP, but this is not an absolute limit. The constraints of the site, though, result in the proposed development not representing a desirable quantity of development for the subject site. Although the site is well served by the suburban train service, there is a lack of community facilities in the area, the topography of the site is difficult, and the local road network is inadequate. It is recognised that the applicant has made changes to the development in response to the topography challenges, site constraints, layout etc. however, the Planning Authority consider that the development does not meet the objectives of sustainable compact growth in addition to the objectives for sustainable development as set out in the Local Area Plan and the Cork County Development Plan.

**Density and Quantum of Development:**

- The Local Area Plan states that residential development within the settlement should fall within the density of 12 to 25 units per hectare, which is described as Medium B density range. Densities of 25 to 35 (Table HOU 4-1 of the LAP) may be allowed where there is an exceptional market demand. Out of a total site area of 13.9 hectares, only 8.7 hectares is developable due to the topography and the fact that part of the public road is included within the site boundary. The

proposed development of 289 units provides for a density of 33 units per hectare. The Planning Authority note that An Bord Pleanála raised no objection to the density at the tripartite pre-planning meeting.

- It is accepted that although the site is well served by train, the topography of the site and its ecological, cultural and heritage sensitivities limit the density that can be achieved here. There are different sensitivities between the northern and southern parts of the site, the northern part is visually more prominent. The southern part is restricted through ecology, Conservation and traffic/ transportation reasons.
- In conclusion on this section, the Planning Authority consider that the development provides for an excessive density and quantum of development in relation to the visual, ecological, cultural and heritage sensitivities of the subject site.
- Included with the CE Report is a report from the Cork County Council Senior Executive Architect and in conclusion they report that the proposed development cannot be supported from an architectural design perspective. The impact on the high value landscape area is a significant concern.

#### **Quality of the Layout:**

- The Planning Authority reference the site topography and sensitivities as restricting the development of this site. The north of the site slopes downwards from 110 m OD Malin to 34.5 m OD Malin at the road known as 'The Terrace' and the southern proportion slopes from 35.5 m OD Malin to 3.3 m OD Malin on Johnstown Close.
- The efforts made by the applicant to improve the layout and design are acknowledged. It is noted that significant works in the form of retaining structures are required throughout the site area to facilitate the provision of the proposed development.

#### **Pedestrian/ Cycle Connectivity:**

- The proposal provides for a 3 m wide pedestrian/ cycle path which links 'The Terrace' and Johnstown Close to the south of the site. The path meanders in

order to overcome the issue of the very steep gradient throughout the site.

Various forms of retaining structures will be used to facilitate the development of this path. Steps are also provided in addition to the ramped route. The Planning Authority detail this infrastructure in the CE Report.

- Concern is expressed by the Planning Authority in relation to passive surveillance of this route through the site, the location of the path through areas of tree cover and overall, there is a concern that this route may not be desirable/ or used by intended users.
- The development would therefore become car dominated through the overly restricted nature of the connectivity and permeability of the proposed development. In conclusion, the proposed development would not meet the requirements and the principles of ensuring that the scheme is future proofed for life-long living in a suitably sustainable manner.

#### **Layout/ Amenity Space:**

- The nature of the site results in the need for an extensive and complex internal road network. A number of open space areas are provided and a MUGA also. The MUGA is surrounded by roads on all four sides.

#### **Private Amenity Areas:**

- The Planning Authority notes that the topography of the site results in sloped gardens/ private amenity areas and also split-level gardens. This gives rise to concerns regarding the useability of these private amenity areas.

#### **Visual Impact:**

- The Planning Authority consider that the submitted Visual Impact Assessment is not comprehensive enough with particular reference to longer viewpoints of the development. The proposed development is likely to have a significant and detrimental impact on the High Value Landscape of the site. The visual impact arising from the proposed development is considered to be unacceptable.

#### **Recreation and Amenity Policy:**

- A total of 12.2% of the site is to be provided as open space and includes three local and neighbourhood play areas, amenity grass areas with amphitheatre

seating, one MUGA, 2 plaza areas, five home zones and two communal areas associated with the proposed apartment blocks.

- The Planning Authority consider that the proposed open space is adequate but the same issues in relation to topography and the useability of these spaces is referenced. The Planning Authority also consider that a larger area of open space could be provided to give some visual relief.

#### **Housing Mix:**

- The Planning Authority consider that the unit mix is acceptable and that the units demonstrate good quality internal space arrangements. The issue of open space useability is again mentioned as a matter of concern.

#### **Part V:**

- The Part V proposal is for the transfer of 31 units, 26 units on the northern section of land, representing 10% provision on this section of land; these lands were purchased in October 2016. Five units are to be provided on the southern portion of the overall lands. The Planning Authority report that the Housing Department (separate report has been provided by the Housing Officer, confirming this) are not satisfied with this provision as there is insufficient pepper potting of units throughout the site. Evidence is required to confirm the date of purchase of the northern portion of the lands.

#### **Conservation:**

- The Planning Authority details the status of Ashbourne House, which is an 18<sup>th</sup> Century House with associated gardens and is a protected structure. The importance of this site/ garden is identified in the Historic Landscape Impact Assessment.
- The Planning Authority also detail the extensive tree and hedgerow removal that the proposed development will result in. Overall, the impact on the Protected Structure and loss of trees/ hedgerows would be contrary to Objective HE 4-1 of the current Cork County Development Plan.
- Included with the CE Report is a report from the Cork County Council Conservation Officer. In summary the Conservation Officer does not support the



proposed development in the form that it is currently submitted as it would negatively impact on the garden and the trees of Ashbourne House, thereby having a negative impact on the protected structure.

**Ecology:**

- Full details are provided in the Cork County Council's Ecology Report which is included in Appendix A of the CE Report. The proximity of the site to the Cork Harbour Special Protection Area and the Great Island Special Area of Conservation are detailed in the submitted CE Report.
- The subject site is not located in an area with flooding potential.
- The main issue of concern from an ecological point of view is the extensive loss of trees on the southern part of the subject lands, and the importance of these trees are referenced in the submitted report of the Heritage Unit (Ecology) of Cork County Council.

**Significant Tree and Hedgerow Loss:**

- The Planning Authority detail the trees that are proposed for removal in order to facilitate this development. Category A, Heritage and Champion trees may be removed as part of the development. Mitigation measures, including replacement trees, are detailed in the application. Some concern is expressed about this proposed replacement of trees, as a form of mitigation, as it is considered that the replacement of such valuable trees is not easily achieved.
- Included with the CE Report is a report from the Heritage Unit (Ecology) and this report confirms that there is significant concern about the removal of trees on this site and it is recommended that permission be refused for the proposed development.

**Bats and Tree Loss:**

- The proposed tree loss would have implications for bats, which are a protected species. According to a submitted bat survey, the site is of Moderate to High Importance for three commuting and foraging bat species. Two Oak trees are of high value roosting potential. There is significant potential for impacts to bats on

the southern section of the site and the northern section will also be impacted upon.

**Anomalies in Assessment of Tree Impact:**

- The submitted documentation does not clearly indicate if a Heritage and Champion Tree Survey has been undertaken by a specialist in this field. There is concern that further such important trees could be on the subject site but that these have not been identified in the submitted assessments.

**Landscape Heritage Impact Assessment:**

- Concern is again raised by the Planning Authority in relation to the impact on trees on site.

**Natura Impact Statement:**

- A NIS has been submitted with the application and the Planning Authority consider this to be acceptable. Recommended mitigation measures should be implemented in full.

**Traffic, Transportation and Roads:**

- Cork County Council have Part 8 approval to provide a high-quality pedestrian/ cycle route between Dunkettle and Carrigtwohill along the L3004, the former N25. The development of this will directly impact on the layout of the proposed development. The proposed development does not appear to have taken into account these works and this would result in unacceptable traffic congestion and a consequent traffic hazard on the surrounding road network. The development is therefore contrary to the proper planning and sustainable development of the area.
- The Cork County Council Traffic and Transport Engineer has recommended that permission be refused for the proposed development.

**Parking provision/ cycle parking:**

- The proposed development provides for a total of 484 car parking spaces and the Cork County Development Plan requirement is for 531 car parking spaces – 512 residential car parking spaces and 19.5 car parking for the associated

commercial aspects of the proposed development including the commercial unit, community space and the proposed creche.

- The car parking standards set out in the Cork County Development Plan are a minimum standard. Reduced car parking can be provided where it can be identified that there is good public transport availability in the immediate area serving such a development.
- The Planning Authority detail the car parking provision in the CE report and outline issues of concern. Adequate bicycle parking is provided for on site. Details are requested in relation to how the emergency access to the north of the site is to be managed and also, in the event that permission is to be granted, a special contribution should be levied towards the cost of traffic calming as was applied previously under PA Ref. 17/5699 and ABP Ref. 300128 -17.

#### **Residential Amenity:**

- The applicant has indicated that the development will take four years to complete and considering the topography of the site it is important that a comprehensive Construction Management Plan be put in place in addition to the preparation of a Construction Environment Management Plan.
- The Planning Authority identify a number of measures that should be employed to ensure that overlooking is not an issue of concern. Details in relation to boundary treatments are also identified as a matter that requires careful consideration.

#### **Community and Social Infrastructure:**

- The Planning Authority refers to an identified need for community and social infrastructure in Glounthaune. Measures are proposed in the draft County Development Plan to expand the Community Zoning, and this is located to the west of the subject site. The management of the community facility will require a suitable condition in the event that permission is granted. Concern is expressed about the proposed MUGA and its useability. This facility will be surrounded by roads on all sides which will make access to it less than desirable.

#### **Creche:**

- The proposed development provides for a creche with a capacity for 67 children; demand from this and an already approved development would be for 59 children. The creche to be provided is therefore acceptable as is the fact that it would be provided in the first phase of the development.

**Phasing:**

- Details are provided in the application and the Planning Authority welcome that the creche, community facility and commercial unit will be provided in phase 1.

**Environment:**

- There is a need for a Construction Environment Management Plan (CEMP) as the site topography and subsoil may give rise to water pollution during the construction phase of the development. Suitable conditions should be applied to any required demolition on site.
- Included with the CE Report is a report from the Cork County Council Environment Officer with only condition requiring the provision of a suitable Construction Environment Management Plan.

**Public Lighting:**

- Details of the requirements for public lighting are provided in Appendix 1, prepared by the Cork County Council Lighting Engineer. A total of 16 points are provided and demonstrate that significant changes will be required to the proposed public lighting layout.

**Utilities/ Infrastructure:**

- Water: Irish Water have reported that there is adequate capacity in the public water supply to serve the proposed development.
- Wastewater: Irish Water have reported that a connection to the public sewer is feasible subject to the need to extend the network by 400 m on 'The Terrace'. No upgrades are required to the Johnstown Pumping Station. All works are within the development boundary and the applicant has confirmed that these works can be carried out in Phase 1 of the development. The proposed works to the wastewater network which are proposed to serve the development are acceptable to the Planning Authority.

- **Surface Water:** Capacity constraints in the network have been identified and a large proportion of the existing drainage network is a combined foul and surface water network. The applicants have proposed to upgrade the foul and surface water network along the terrace and Johnstown Close in order to serve the proposed development, and which will be done as part of Phase 1 of the development.

**Electricity/ Gas:**

- The ESB will provide suitable infrastructure to serve the development including the provision of four kiosk substations. Gas Networks Ireland will provide a network to serve the development.

**Naming of Development/ Internal Roads:**

- The Planning Authority refers to Policy HE5-2 of the Cork County Development Plan which seeks to promote and preserve local place names, local heritage and the Irish language through the appropriate naming of new developments. This can be addressed by way of a suitable condition.

**Chief Executive Recommendation:**

- Cork County Council do not support the proposed development of this site as submitted and it is considered to be contrary to the objectives of the Cork County Development Plan 2014 – 2020 and the Cobh Municipal District Local Area Plan 2017 for four reasons:
  - Due to the topography of the site and the number of units proposed, the development is excessively scaled, is dominated by cars, does not provide easy/ convenient connectivity for pedestrians/ cyclists, and fails to provide for useable amenity space. The inadequate distribution of Part V housing on site results in an inappropriate form of development which does not demonstrate a sustainable and high quality, people centred, liveable and safe environment.
  - The layout and nature of the development will result in a detrimental impact on the designated High Value Landscape.

- The southern part of the site includes part of the garden of Ashbourne House, which is a protected structure, and the garden includes a number of high-quality trees. The removal of these trees would negatively impact on the setting of the protected structure and would negatively impact on the ecologically and culturally valuable woodland habitat which is also of a biodiversity value.
- The proposed development is likely to give rise to traffic hazard and traffic congestion in an area with substandard road access.
- In conclusion the Planning Authority recommend that the proposed development be refuse permission.
- A list of suitable conditions is included in the event that it is recommended that permission be granted for the proposed development.

## 9.0 Prescribed Bodies

9.1. The applicant was required to notify the following prescribed bodies prior to making the application:

- The Minister for Culture, Heritage, and the Gaeltacht, (in relation to nature conservation)
- The Heritage Council (in relation to nature conservation)
- An Taisce (in relation to nature conservation)
- Irish Water

Irish Water and An Taisce each made a submission.

9.2. The following is a brief summary of the issues raised.

### 9.2.1. Irish Water:

Irish Water advised the applicant that the proposed connection to the public foul drainage system would require upgrade works to extend the length of the network by

approximately 400 m. As Irish Water have no plans for such works, the applicant will be required to fund this extension which will be located in the public domain.

In relation to water, Irish Water confirm that a connection to the public system is feasible and does not require any upgrades.

Irish Water advise that the design and construction of all water and/ or wastewater infrastructure within the redline boundary of the development site are entirely the responsibility of the applicant.

Irish Water has requested that in the event that permission is granted that conditions be included as follows:

- 'The applicant shall sign a connection agreement with Irish Water prior to the commencement of the development and adhere to the standards and conditions set out in that agreement'.
- 'Irish Water does not permit any build over of its assets and the separation distances as per Irish Waters Standards Codes and Practices which must be achieved.
  - (a) Any proposals by the applicant to build over or divert existing water or wastewater subsequently occurs the applicant submit details to Irish Water for assessment of feasibility and have written confirmation of feasibility of diversion(s) from Irish Water prior to connection agreement'.
- 'All development is be carried out in compliance with Irish Water Standards Codes and Practices'.

#### 9.2.2. **An Taisce**

An Taisce have reported under two headings as follows:

##### (1.) Infrastructure and Services:

There is a need to ascertain that adequate capacity exists in the wastewater treatment system in order to accommodate this development. The Cork City

Wastewater Treatment Plant, which will serve this development, is already in breach of nutrient limits for nitrogen and phosphorous. Water quality at Lough Mahon is currently assessed as of moderate status and at risk according to the Water Framework Directive. The submitted NIS reports that the discharges from the wastewater treatment plant are not having an observable impact on water quality, however An Taisce recommend that this be considered in combination with other development in the area.

There is also a need to ensure that adequate services and facilities be available in Glounthaune that ensure that the development/ area is not car dependent. The proximity to the train station is welcome but there needs to be adequate capacity to serve the development.

(2) Curtilage of Ashbourne House and Gardens:

Part of the site, to the south of The Terrace forms part of the curtilage of Ashbourne House, with gardens that include a collection of historic tree specimens. An Taisce recommend that as many as possible of the trees be retained, as is safely possible.

## **10.0 Oral Hearing Request**

No requests were made.

## **11.0 Assessment**

11.1. The Board has received a planning application for a housing scheme under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016. Having examined the application details and all other documentation on file, including the Chief Executive's Report from the Planning Authority, and all of the submissions received in relation to the application, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the main issues in this application are as follows:

- Principle of Development and Density
- Design and Layout
- Pedestrian and Cycle Route



- Visual Impact
- Residential Amenity – Future Occupants
- Residential Amenity – Existing/ Adjacent Residents
- Transportation, Traffic, Parking and Access
- Infrastructure and Flood Risk
- Childcare
- Part V Social Housing Provision
- Comment on Submissions/ Observations of the Cobh Municipal District
- Other Matters
- Material Contravention
- Appropriate Assessment (AA)
- Environmental Impact Assessment (EIA)

**Note:** The current plan for County Cork is the Cork County Development Plan 2014 – 2020 and the relevant local area plan for Glounthaune is contained within the Cobh Municipal District Local Area Plan 2017. Cork County Council are currently preparing a new county plan which is due to be adopted by the elected members on the 25<sup>th</sup> of April 2022 and which will come into effect on the 6<sup>th</sup> of June 2022.

## 11.2. Principle of Development and Density

11.2.1. Having regard to the nature and scale of proposed development which is in the form of 289 residential units, consisting of 88 apartments/ duplexes and 201 houses, in addition to a community unit, creche and commercial unit, on lands within the ‘Settlement Boundary’ of Glounthaune, I am of the opinion that the proposed development falls within the definition of Strategic Housing Development as set out in Section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

11.2.2. The site is located in Glounthaune some 9 km to the east of Cork City and is located within the Cork County area. The proposal for 289 residential units provides for a net density of 33 units per hectare. This net density is got by calculating the site area at 8.7 hectares, that is the land that can actually be

developed. A significant proportion of the site is used to provide the pedestrian/ cycle routes and also the gradients do not allow for any development within sections of the site.

11.2.3. The proposed development provides for 287 residential units that form the overall scheme and two additional houses are proposed to the southern part of the site; one of these is a replacement for the house to be demolished in this section of the site and the other unit will provide for passive surveillance of the proposed footpath/ cycleway towards the southern section of the site.

11.2.4. The applicant refers to this development as Phase 2 of a two-phase development, the other phase is located to the west and is currently under construction. The phase 1 lands allow for a suitable vehicular access point to the subject lands from the L-2968 local road. The junction with the L-2968 is to be signalised.

11.2.5. The site is within the defined Settlement Boundary of Glounthaune, and which allows for the provision of residential development. The Cobh Municipal District Local Area Plan, which includes the plan for Glounthaune, limits the number of units that can be provided at one time at 40 units as required under Objective GO-01 of the local area plan and in addition the proposed development would cumulatively with other permitted developments exceed the target figure of 400 units in Glounthaune – contrary to Objective GO-01.

11.2.6. The Planning Authority consider that some scope for providing additional units can be made and that development need not be limited to 40 units, the principle of this has been established through the granting of permission for developments in excess of 40 units. The applicant has attempted to address these issues in the Statement of Material Contravention that is provided in support of the application.

11.2.7. 'Table HOU 4-1: Housing Density on Zoned Land in the Cork County Development Plan 2014 – 2020' within Medium B density allows for a range of 12 to 25 dwellings per hectare in locations such as Glounthaune. Densities between 25 and 35 dwellings per hectare 'will be considered where an exceptional market requirement has been identified'. The proposed development provides for a density of 33 units per hectare as detailed under Section 11.2.2.

11.2.8. **CE Report comments:** The Planning Authority considered that the proposed density and scale of development was excessive and would be out of character in this part of Glounthaune. Whilst applications for developments in excess of 40 units may be acceptable, the submitted application provides for an excessive number of units in the one application. The Planning Authority through the CE report recommend that permission be refused for the proposed development as submitted.

11.2.9. **Conclusion on Section 11.2:** The subject site allows for residential development and the proposal would see the provision of 289 residential units in an area that is characterised by residential development. The area is served by Glounthaune railway station which is served by Cork to Cobh and Midleton services and the proximity to this station, with a regular train service, is used to promote the development of this site.

11.2.10. The density of development at 33 units per hectare and the scale of development that would provide for an additional 288 houses here, including a replacement dwelling for the one to be demolished, would significantly change the established character of the area. I note the details submitted by the applicant and have had full regard to Table HOU 4-1 of the Cork County Development Plan in relation to the proposed density of development on this site. The density falls within the range of 25 to 35 units where an exceptional market requirement has been identified.

11.2.11. The applicant has not provided an 'exceptional market requirement' but refers to national guidance such as the Apartment Guidelines, 2018, the Sustainable Residential Developments in Urban Areas, 2009, the National Planning Framework and the Regional Spatial & Economic Strategy for the Southern Region, all of which promote the development, consolidation at appropriate densities of existing urban areas, in support of the development and its density. The availability of public transport is also used in support of this development.

11.2.12. The stated developable site area is 8.7 hectares; the topography of the site does not allow for the development of the full 13.87 hectares. This developable area is indicated on Drawing No. 20151/P/003 – Proposed Site Plan and is outlined in orange. Excluded areas are designed to provide for additional

amenity lands/ buffer areas. Also included is the footpath/ cycle path that connects the northern lands to The Terrace and most of the lands to the south of The Terrace.

11.2.13. I note the justification for the stated developable site area at 8.7 hectares and I accept the proposed density of 33 units per hectare having regard to the vision of the LAP 'to secure a significant increase in the population of settlement' and the fact that Table HOU 4-1 of the Cork County Development Plan makes provision for such a density.

11.2.14. I do have a significant concern about the scale of development, and the impact this would have on the character of the area and residential amenity of the existing area and that of the potential occupants of the submitted proposal. These issues will be addressed further throughout this report.

### 11.3. Design and Layout:

11.3.1. The critical issue, and perhaps the one that has the most impact on this development, is the site topography. The top of the site toward the north has a height of circa 100 m OD and this falls to 34.5 m OD at 'The Terrace' and from the terrace to the bottom/ south of the site, there is a further fall from 35.5 m OD to 3.3 m OD. This fall of circa 97 m is over a distance of 740 m.

11.3.2. From the site visit, it was immediately evident that the site has a significant fall on a north to south axis. The views from the public road to the north are limited, but upon accessing the northern most field, it was clear that the site provided a high-quality view to the south over Cork Harbour. Similar high-quality views, though more limited by trees/ vegetation, are got from The Terrace when looking south.

11.3.3. The proposed site layout is divided into two distinctive areas as follows:

- Northern section: Contains the majority of the housing units and extends from the road to the north to The Terrace to the south. This section of the site consists of a mix of houses and apartment/ duplex units. The houses are in the form of detached, semi-detached and terraced units; two houses are listed as replacement dwellings. A creche is provided in the northern section and also a MUGA in addition to extensive landscaping.

- Southern section: This includes the lands to the south of The Terrace. A four-storey apartment block of 24 units, with commercial unit and community unit at ground floor level, is provided to the south with access from the existing greenway to the east of the Waterside Apartments. To the south of The Terrace is a block of four townhouses and to their east is a detached house.

11.3.4. The submitted layout and design are supported with an Architectural Design Statement prepared by DG Architects. Chapter 04 – Design Strategy of this document, considers the development in the context of the Urban Design Manual and the 12 design criteria within the guidelines. This design statement details how the finalised layout design was developed. Section 4.4 provides details on the Housing Mix/ Proposed Density and also identifies four separate character areas throughout the site. These character areas are defined by type of residential unit and the external finish on these. The mix of render, brick and stone will clearly differentiate one character area from another.

11.3.5. In general, the layout is good in that the residential units are provided in rows generally on an east-west axis which follow the contours of the site. Careful consideration is given to active frontage/ passive surveillance in the side elevations that address the residential streets. The design manual indicates that the layout will provide for a high quality of residential development with open space areas within walking distance of all units and high-quality landscaping will soften the environment that may otherwise be dominated by engineering features.

11.3.6. Character Area 4 consists of the row of four townhouses and detached houses either side of The Terrace and the block of apartments to the south of the site. The proposed units in Character Area 4 are considered to be appropriate in terms of their integration with their surroundings. The provision of apartment blocks to the south of the site is appropriate having regard to the existing apartment block to the west and the proximity to the services in the area.

11.3.7. I will comment on the pedestrian and cycle route in the next section of this report; however, I note that the proposed road layout dominates the northern section of the site due again to the gradient of the site. The proposed access is from the development under construction to the west of the site and the road/ street network proceeds to zig-zag through the northern section of the site in order to serve

the proposed residential units. I accept that the applicant has provided a workable solution in relation to the road network, and which integrates with the contours.

11.3.8. The Site Sections, Drawing No. 21543-2-201, clearly indicates the impact of these contours and also the need for substantial engineering works to accommodate the layout. Section G-G demonstrates a need for substantial earth removal and also a need for additional earth build-up in other parts of the site. It can be assumed that there will be a requirement for significant piling to ensure the stability of the land at construction and post construction stage.

11.3.9. An extension to the south of Section A-A would demonstrate a need for 4 roads over a 50 m section of the site. The area of land to the south of Character Area 1 and north of Character Area 2 is excluded from the site area for the purposes of density calculation, this is accepted, however this area of land is dominated by roads and again this is primarily due to the contours of the site. I would also be concerned about the road layout in the area of the MUGA and creche in terms of domination by the roads.

11.3.10. **CE Report comments:** The Planning Authority raised no particular concerns in respect of the layout/ design of the development.

11.3.11. **Conclusion on Section 11.3:** Whilst the layout makes sense in terms of providing the number of units indicated, and also ensuring that the site is accessible, I would have concerns about the overall impact of the development on the character of the area. The topography of the site requires a somewhat excessive road layout, this is evidenced by the need for four separate roads over a width of 50 m towards the north of the site. If the applicant had extended Section A-A further to the site, this would have been evident. I accept the need for this road network, but it is a symptom of a bigger problem which is addressed further in this report.

#### 11.4. Pedestrian and Cycle Route

11.4.1. The proposed development and the supporting documentation promotes the use of sustainable forms of transport. Glounthaune is 9 km to the east of Cork City which is the primary focus for employment, recreation, social services and education in the region and the presence of the train service allows for easy access to the city.

11.4.2. The trains service operates on the basis of two trains per hour off peak and up to four in the peaks. Plans are in place for the substantial improvement in the service in the future. The internal layout provides for a clearly defined pedestrian and cycle route from the north of the site to the south, crossing over The Terrace and connecting into the existing greenway at the southern boundary. In principle there is a good connection from within the site to Glounthaune station, which is located to the south east.

11.4.3. I have a number of concerns about this route, and I would consider its potential use is overstated in the submitted documentation. I note the comments made in the third-party observations about the potential use of this route and in general I agree with the concerns raised. The route may be used southbound/ downhill but return trips uphill/ northbound are likely to be off-putting for the majority of people due to the steep climb, the need to climb either a significant number of steps/ or ascend a number of ramped paths and through the meandering nature of the route. I do accept that standard desire lines do not apply due to the site gradients, but the indirect nature of the route will significantly reduce its use.

11.4.4. The southern section of the route is especially dominated by meandering paths/ ramped areas. The initial section to the east of the proposed apartment block heads north and then diverts due west before continuing on a circuitous route to The Terrace. The next section continues in this fashion before entering the southern section of Character Area 3. For anybody wishing to walk/ cycle to the top of the site, the route continues in a mix of long straight lines and meandering sections towards the northern part of the site.

11.4.5. I refer to the 'Permeability Best Practice Guide' prepared by the NTA and the section '2.2.5 Comfort' which lists a number of considerations for the development of routes such as this and includes the need for appropriate widths, high quality surfaces and to avoid obstructions. I am satisfied that these issues can be addressed, however another consideration 'Are gradients excessive for pedestrians and cyclists?' and unfortunately, I have to say that they are in this case. It is not just the gradient but also the extent of these throughout the length of the route that is an issue.

11.4.6. If permission is granted for this development, and it is constructed in accordance with the plans, I would expect that the vast majority of journeys will be undertaken by car. To walk the route on a daily basis, especially for those living to the north of The Terrace would be daunting and only more experienced cyclists would be likely to undertake the cycle. To walk/ cycle the route in the night/ dark would be very unattractive and although passive surveillance has been built into the design, I don't consider this to be sufficient.

11.4.7. Retail facilities are only available to the south of the site and those attending school would more than likely have to be driven to the school. The principle of providing a strong cycle/ pedestrian route through the site and continuing onto the railway station is desirable but the fact remains that the steep gradients of the site are likely to be off-putting for those who may use such forms of transport. I therefore do not consider that this route is appropriate in this location. Those units to the south of The Terrace may avail of the route to access the railway station but the northern section is less likely to do so. This northern section is where the majority of the units are and as the number of units/ density of development is excessive in the absence of high-quality sustainable forms of transport, the majority of the development will give rise to increased car-based traffic.

11.4.8. **CE Report comments:** The Planning Authority recommend that permission be refused for the proposed development due to the excessive scale of the development, the fact that the scheme is car dominated and the development does not facilitate easy and connectivity for pedestrians and cyclists.

11.4.9. **Conclusion on 11.4:** I note the comments of the Planning Authority and I concur in full with them. I have visited the site and walked the surrounding area and what was evident was the steep gradients of the area and the lack of continuous and suitable quality of pedestrian/ cycle infrastructure in the area. The provision of 289 units in the area would have a significant impact on the existing road network and there is little doubt that this development would be car dominated.

11.4.10. I accept that the applicant has attempted to address these issues and the submitted photomontages in the Architectural Design Statement present an attractive development with the footpaths forming a key element of the design. These images do not disguise the steep gradients (see pages 72, 75, 77) of the



Architectural Design Statement) but what is not illustrated is the number of steps that would have to be climbed if coming from the railway station and walking to only Character Area 3 let alone Area 1.

11.4.11. The design has provided for passive surveillance of the main and ancillary pedestrian/ cycle route(s). As I will comment throughout this report, the design of the residential units and overall layout is of a high quality and the applicant has proposed a good development, however, the topography of the site cannot be easily addressed. That is a critical problem with the development – the inability to be able to address the topography in an acceptable manner. Therefore, due to the inability to accommodate pedestrian and cycle movements on this site, the proposed scheme will be car dominated and I recommend that permission be refused for the proposed development.

## 11.5. Visual Impact

11.5.1. The elevations of the proposed units will be finished in a mix of brick, stone and render so as to provide a defined style to each of the four-character areas. The mix of materials finishes is welcomed and provides for a form of wayfinding throughout the site. The proposed apartment block with units at ground floor level is also considered to be visually attractive. It may be appropriate to finish the entire front in brick in the interest of maintenance/ reduce potential for staining of the render. A lighter coloured brick may suffice in this case. The proposed creche building is considered to be an attractive building mixing traditional and contemporary architectural design whilst ensuring that it provides a suitable presence in this key location on the site.

11.5.2. In general, the proposed site landscaping is of a good quality and will add to the overall quality of the development proving a softening of the areas between the residential units and the internal road network. The landscaping has also been carefully considered in the context of the pedestrian/ cycle route.

11.5.3. At the macro level, the proposed development will have a significant adverse impact on the visual amenity of the area. The area, including the subject site, is designated as a High Value Landscape in the Cork County Development Plan. When viewed from a distance the development will dominate this section of

Glounthaune. The northern section in particular will appear to be totally out of character with the existing form of development which is a much lower density of density with extensive tree cover screening much of this housing. View 1 as provided in the Architectural Design Statement, clearly indicates the visual impact when viewed from the N25 to the south. I accept that the view from within and immediately adjoining the site will be more restricted than that from a relative distance.

11.5.4. The number of units proposed will adversely change the visual character of the area. In addition, the need for extensive engineering works to provide the internal road network and the pedestrian/ cycle route, will also have an adverse impact on the visual character of the area. Construction work is progressing on the development to the west of the site and from which the access to the site will be provided. From the site visit it was evident that the construction of this development of 38 houses requires significant works that have changed the character of the area. The proposed development is on a far larger site and provides for a far greater number of units and the consequential impact on the character of the area would be far greater.

11.5.5. Third party observations commented on the visual impact of the proposed development and in general I agree with the comments raised. Glounthaune has a village character at present, even allowing for substantial numbers of new houses in the area. The provision of an additional 289 houses would significantly change the character of the area and perhaps most significantly would be the visual impact.

11.5.6. **CE Report comments:** The Planning Authority noted that the development consists of a significant development on a site with steep slopes and which is located in an area with a High Value Landscape. The Cork County Development Plan seeks to ensure that developments integrate into their existing landscape/ environment and the Planning Authority consider that the development would have a detrimental impact on the designated High Value Landscape.

11.5.7. **Conclusion on Section 11.5:** The proposed development is considered to be visually acceptable at the micro level but when viewed from outside the site, the proposed scheme would have a significant adverse impact on the visual

amenity of the area, and I recommend that permission be refused for the proposed development.

## 11.6. Residential Amenity – Future Occupants

11.6.1. **Unit Mix:** A total of 289 residential units in the form of houses and apartments/ duplexes is proposed and is summarised in the table below:

<b>Unit Type</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>	<b>Total</b>
Number of Apartments/ Duplexes	41	39	8		<b>88</b>
Number of Houses		66	74	61	<b>201</b>
<b>Total</b>	<b>41</b>	<b>105</b>	<b>82</b>	<b>61</b>	<b>289</b>

As can be seen from the above table, there is a good mix of unit types, and a good mix within the apartment/ house types. The proposed unit mix demonstrates compliance with Specific Planning Policy Requirement 1 (SPPR 1) of the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’.

11.6.2. **Quality of Units – Floor Area:** A ‘Housing Quality Assessment’ submitted with the application provides a detailed breakdown of each of the proposed apartment and duplex units. All units exceed the minimum required floor areas, and the majority of which providing for over 110% of the required minimum floor area. The proposed apartments are considered to be acceptable and demonstrate compliance with SPPR 3 of the ‘Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities’.

11.6.3. The proposed houses also exceed the required minimum standards as set out in the ‘Quality Housing for Sustainable Communities, 2007’ in terms of room sizes and the overall floor area provision.

11.6.4. The proposed apartment block (to the south of the site) is a four-storey unit with a commercial and a community unit on the ground floor. The breakdown is as follows:

<b>Floor</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>Total</b>
Ground	3	1		4
First	4	2	1	
Second	4	2	1	
Third	3	2	1	
<b>Total</b>	<b>14</b>	<b>7</b>	<b>3</b>	<b>24</b>

A single lift is provided centrally in the block, in addition to a stairwell, to serve the first, second and third floors and this is in compliance with SPPR 6 of the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities'.

11.6.5. Adequate and accessible storage is proposed to serve each of the apartment and duplex units. The proposed houses are also provided with adequate storage, and which is easily accessible.

11.6.6. **CE Report comments:** No issues of concern were raised in relation to the proposed development in terms of the residential amenity for the future occupants.

11.6.7. **Conclusion on Section 11.6:** The proposed development provides for an adequate mix of unit types. The internal layout of these units is acceptable and complies with recommended requirements. There is no reason to recommend a refusal of permission to the Board in terms of the unit mix and internal floor area quality.

11.6.8. **Quality of Units – Amenity Space:** The apartment block units are provided with adequate private amenity space in the form of balconies for the upper floor units/ terraced areas for the ground floor units. This private open space is accessed from living room areas and can be used without impacting on adjoining bedrooms. The apartment block is provided with a communal roof garden, and which is accessible by the lift/ central stairwell, making this space accessible to all residents of this block.

11.6.9. The proposed duplex/ apartment units are provided with suitable balcony space as the appropriate private amenity area for these units.

11.6.10. Communal open space for the apartment block (south of the site) is provided in the form of a rooftop garden with a stated floor area of 314 sq m, this is acceptable. The own door apartment/ duplex units are allocated an area of open space, with a stated area of 515 sq m, to the south of units 156 to 177 and north of 178, 180 to 185. I would have a concern regarding this area of open space as Section H-H indicates that this site contains a significant slope and a lot of this piece of communal open space would have no amenity function other than providing a visual amenity aspect. The crossing of this space with footpaths/ steps further reduces its useability.

11.6.11. The proposed houses are provided with adequate private amenity space; the submitted plans and private amenity space details indicates that a significant number of these units are provided with a significant excess of open space. In addition, the depth of gardens and the generous areas provided, ensure that adequate separation distances are provided to the adjacent boundaries.

11.6.12. Concern must be expressed though about the useability of these garden spaces. I refer to page 59 of the Architectural Design Statement and how the design has attempted to address the interaction with existing houses, but what the cross sections through the gardens demonstrate steep slopes and a need for steps to get from one level to the other. The sections indicate that the adjoining houses have an even more pronounced gradient in their garden, however I am unaware of the specific issues in those cases. The need for steps affects nearly every unit and indicates the significant slope through the site.

11.6.13. This issue also affects the provision of public open space. 12.2% of the site area is stated to be for open space provision. The Site Sections – Drawing No: 21543-2-201 demonstrate that these open space areas are severely impacted by site gradients and the true/ useable area of open space would be far less than the stated 12.2%. The landscape design is good in that they have incorporated the sloped areas into the layout in the form of informal seating areas and planted sections. These reduces the overall available area of open space and I consider it to

be inappropriate that the residents be provided within an under provision of useable open space.

11.6.14. I am also concerned about the layout of the open space areas. These are very linear and results in no large area suitable for informal ball games/ active recreation. I welcome the provision of the MUGA, and its central location should ensure it is easily accessible to the majority of the residents of this development. The largest area of open space is to the east of the MUGA and creche, but as section G-G demonstrates, only half of this would be useable – leaving approximately 2700 sq m, which is a reasonably good space.

11.6.15. **CE Report comments:** No issues of concern were raised in relation to the proposed development in terms of the provision of suitable private and communal open space to serve the future residents. Concern was raised about the provision of public open space. Open space areas are dominated by the presence of roads, some adjoin two or three roads and the MUGA is bounded on all four sides by roads. The impact of the roads and the site topography all reduce the quality and useability of the proposed public open space areas.

11.6.16. **Conclusion on Sections 11.6:** The proposed development provides for adequate private and communal open space areas. I have a concern about the quality of the public open space areas and although these provide for an adequate quantity, the quality is severely impacted by the subject site topography, layout, and relationship with the road network. The quality of these spaces does not demonstrate that suitable provision is made for future residents of this development.

11.6.17. **Unit Aspect:** The proposed apartment block of 24 units provides for 9 single aspect units, 37% of the total number of units. These units are south facing and would benefit from good daylight and sunlight.

11.6.18. **Daylight and Sunlight:**

11.6.19. The proposed development provides for a mix of two and three storey units, in addition to a four-storey apartment block located to the southern part of the site.

11.6.20. The Cork County Development Plan 2014 - 2020 does not specifically refer to any requirements in relation to daylight and sunlight. The 'County Development Plan Objective HOU 3-1: Sustainable Residential Communities' states:

'a) Ensure that all new development within the County supports the achievement of sustainable residential communities. The Council will have regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual, in development plan preparation and in assessing applications for development through the development management process'.

Under Section 3.3.7 it is stated:

'At the level of the individual house, the Guidelines outline design considerations regarding the home and its setting, including daylight, sunlight and energy efficiency; privacy and security; car and bicycle parking; private and communal open space; residential density; access for all and communal services. Developers and designs will be expected to have due regard to these issues in formulating their development proposals'.

11.6.21. No specific daylight and/ or sunlight study was provided with the application. I have had full regard to the Building Research Establishments (BRE) 'Site Layout Planning for Daylight and Sunlight – A guide to good practice' and which describe recommended values (e.g., ADF, VSC, APSH, etc) to measure daylight, sunlight and overshadowing impact. It should be noted that the standards described in the BRE guidelines are discretionary and not mandatory policy/criteria (para.1.6). The BRE guidelines also state in paragraph 1.6 that: 'Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.'

11.6.22. The BRE document notes that other factors that influence layout include considerations of privacy, security, access, enclosure, microclimate etc. in Section 5 of the standards. In addition, industry professionals would need to consider various factors in determining an acceptable layout, including orientation, efficient use of land and the arrangement of open space, and these factors will vary from urban locations to more suburban ones.

11.6.23. The northern section is where the majority of the units are located, and I am satisfied that the proposed layout and separation distances will ensure that proposed units will receive daylight and sunlight. The majority of the units are on a north/ south axis with gardens either to the north or south of the house. Good light

penetration will be received for all such units. The three-storey apartment/ duplex units will also receive good daylight/ sunlight.

11.6.24. As already noted, the number of single-aspect units in the proposed 4 storey block located to the south of the site are limited to south facing units only. These will receive high quality sunlight/ daylight throughout the day.

11.6.25. I would have a concern about the apartments located to the north east of the block, units no. 3, 6, 13 and 20, with particular reference to the private amenity space as this area will be in shadow for much of the day. These are dual aspect units, but one aspect faces north towards the slope of the site and will not receive much daylight from that side. In addition, in an attempt to address issues of overlooking, the area of open balcony is restricted and will therefore reduce potential light penetration. In the absence of a suitable assessment provided by the applicant, it is not certain what the situation would be, but it may be appropriate to omit these units in the event that permission is to be granted.

11.6.26. Overall, I am content that the receipt of daylight and sunlight will be of a high quality, other than the units referenced in the apartment block.

11.6.27. **CE Report comment on residential amenity:** The Planning Authority through the CE report, did not raise any issues of concern in relation to the residential amenity proposed in the submitted development, other than concerns in relation to the provision of public and private open space and its useability.

11.6.28. **Conclusion on Residential Amenity:** Overall the proposed development will provide for a high quality of residential amenity in this part of Glounthaune. Room sizes, layout, and proposed amenity spaces, in terms of area, are of a good standard. I do have a concern about the quality of the open space, and I note the comments of the Planning Authority in relation to this. I have

## 11.7. Residential Amenity – Existing/ Adjacent Residents

11.7.1. **Existing Site:** The development of a greenfield site within an area that contains existing residential development will give rise to a level of nuisance and disturbance to existing residents, especially during the construction phase. I note all of the comments made in the observations in this regard, however I am satisfied that any development of a site of this scale and located in such an area will give rise to



some temporary nuisance and this has to be weighed up against the long-term impact of the development of this site.

11.7.2. No particular issues were raised by third parties in relation to daylight and sunlight. The proposed development provides for a mix of two and three storey units, in addition to a four-storey apartment block located to the south of the site. The northern section is where the majority of the units are located and there is no concern regarding loss of daylight and sunlight due to the layout, generous separation distances provided between proposed and existing houses and the topography of the site.

11.7.3. The Cork County Development Plan 2014 - 2020 does not specifically refer to any requirements in relation to daylight and sunlight. The 'County Development Plan Objective HOU 3-1: Sustainable Residential Communities' states: 'a) Ensure that all new development within the County supports the achievement of sustainable residential communities. The Council will have regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual, in development plan preparation and in assessing applications for development through the development management process'.

Under Section 3.3.7 it is stated:

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11.7.4. No specific daylight and/ or sunlight study was provided with the application. I have had full regard to the Building Research Establishments (BRE) 'Site Layout Planning for Daylight and Sunlight – A guide to good practice' and which describe recommended values (e.g., ADF, VSC, APSH, etc) to measure daylight, sunlight, and overshadowing impact. It should be noted that the standards described in the BRE guidelines are discretionary and not mandatory policy/criteria (para.1.6). The BRE guidelines also state in paragraph 1.6 that: 'Although it gives numerical

guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”

11.7.5. The BRE document notes that other factors that influence layout include considerations of privacy, security, access, enclosure, microclimate etc. in Section 5 of the standards. In addition, industry professionals would need to consider various factors in determining an acceptable layout, including orientation, efficient use of land and the arrangement of open space, and these factors will vary from urban locations to more suburban ones. The BRE guidelines state that in relation to daylight to existing buildings:

11.7.6. The proposed 4 storey block located to the south of the site is suitably located in relation to the existing apartment block to the west as not to impact on daylight or sunlight levels. Therefore, no analysis of the impact of this proposed building on any existing properties is required, as the potential is negligible and can be ruled out without further testing as per para.2.2.4 of the BRE guidelines. As I have already commented, all other neighbouring properties are situated a sufficient distance away from the development and would not experience any, or significant loss of light and/ or increased overshadowing.

11.7.7. Overall, I am content that daylight, sunlight, and overshadowing impact from the proposed development upon existing properties will not be noticeable due to the topography of the site, layout and separation distances. I have applied the guidance within the BRE guidelines and associated BS 17037:2018 in my assessment of this issue, and I am satisfied that existing residential amenity will not be impacted upon.

11.7.8. **Potential overlooking:** Concern was raised in the third-party observations in relation to potential overlooking and a consequent loss of privacy. The proposed development provides for adequate separation distances between the rear of existing and proposed units. The four-storey apartment block is suitably located and designed to ensure that overlooking does not occur.

11.7.9. I have already commented on the layout of the site, and I am satisfied that the proposal as submitted has full regard to the potential impact on existing houses that adjoin the site.

11.7.10. **CE Report comment on residential amenity:** I note again the comments in the CE report and no issues of concern were raised in the submitted report in relation to the potential impact on existing residential amenity.

11.7.11. **Conclusion:** Overall I am satisfied that the development will not have a unduly negative impact on the existing residential amenity of the area. I have no reason, therefore, to recommend to the Board that permission be refused due to impact on the existing residential amenity of the area.

## 11.8. **Transportation, Traffic, Parking and Access**

11.8.1. **Traffic:** A number of documents have been submitted in support of the application in relation to traffic and transportation as follows:

- Stage 1 Road Safety Audit – Bruton Consulting Engineers
- Statement of Compliance with DMURS– AECOM
- Constraints Study 1 - Site Permeability – AECOM
- Constraints Study 2 - Site Layout – AECOM
- Site Lighting Design Proposal – AECOM

In addition, the submitted EIAR includes a Chapter on Traffic and Transportation and includes a supporting information in the appendices.

Full regard has been had to these documents.

11.8.2. The 'Constraints Study 1 - Site Permeability' recognises the engineering challenges associated with this site and which include 'topography, geology, physical form, and lack of pedestrian connectivity between the upper and lower lands'. The layout has been designed to address these issues. In terms of road layout there are access points as follows:

- From the L-2968 to the west of the site through the development under construction, forming phase 1 of the masterplan lands. The connection with the L-2968 to be signalised.
- An emergency only access, to the north, from the L-2969. Flexible bollards and grasscrete will be used to limit access.

- The two replacement houses to the north of the L-2970/ The Terrace will be accessed from a long driveway from this road.
- The houses to the south of the L-2970/ The Terrace will have a direct access from this road to a car parking area.
- The apartment block to the south is accessed from an extension of the existing public road over the greenway.

11.8.3. Constraints Study 2 – Site Layout details individual access to groups of houses etc. The Road Safety Audit identifies a number of issues with the design including:

- Gradients from car parking spaces to front doors of residential units.
- There will be a very steep gradient on the access road to units 259 and 260 from The Terrace. This could lead to inaccessibility in ice/frost/snow conditions and loss of control on the steep gradient.

I note also the information provided in the EIAR and the DMURS statement of compliance submitted in support of the application.

11.8.4. A large number of the observations referred to concern regarding traffic in terms of the increase in volume and the also the fact that the surrounding road network presented a number of deficiencies. Concern was expressed about the emergency access, the impact on The Terrace and the impact on the existing roads in the area around the Dry Bridge, which is not part of the site area but is a key junction on the local road network especially as most of the traffic from the site will pass through this area.

11.8.5. On the day of my site visit I drove around the local road system to ascertain the quality of this network. The local road network is probably adequate for the existing requirements of the area, but a number of pinch points were evident such as the Dry Bridge and along sections of The Terrace. I accept that the development of the N25 has reduced much of the traffic through Glounthaune, however development in the area is likely to increase volumes over time.

11.8.6. Footpath provision varies with good quality sections, gaps in the network and then entire sections with no footpaths at all. There is not a continuous network of footpaths in the area.

11.8.7. I have already commented on the provision of sustainable forms of transport primarily in the form of walking and cycle routes through the site. I have also commented on the issues associated with topography and concern regarding the amount of road needed within the site to adequately serve the development. The submitted sections clearly indicate that levels drop/ rise over short sections and driving along the proposed layout may prove frustrating through the number of sharp right/ left angle turns, a layout that may lack in wayfinding and the need to break/ be in suitable gear when driving. Whilst these may not all be planning issues, they do demonstrate the somewhat contrived nature of the site, with issues that wouldn't be normal for a new build development on a greenfield site.

11.8.8. I have already outlined why I consider (noting the comments from third parties and the Planning Authority) that the development will be car dominated with even short trips undertaken through use of the car. To live within the northern section of the subject site could be very difficult/ challenging for those who don't have access to a car. The issue of poor access significantly reduces the quality of other aspects of the development.

11.8.9. I note the Road Safety Audit and concur with the issues raised in concern. I am slightly surprised that the list was not more extensive for some of the reasons I have outlined.

11.8.10. **CE Report comment:** It is recommended that permission be refused for the proposed development due to the generation of significant traffic movements from the development on a substandard road network. The development would give rise to traffic congestion and a consequent traffic hazard. The Area Engineer supported this recommendation with their report raising similar issues of concern, in addition to noting that the local road network could not accommodate footpaths from the site to Glounthaune village and increased pedestrian traffic would give rise to safety hazards.

11.8.11. **Conclusion:** The local network has not developed over the years to an extent that it can accommodate a significant volume of additional traffic in the form that this development is likely to generate. The traffic that by-passes Glounthaune on the N25 was unlikely to use the roads in the vicinity of the site and areas such as

the Dry Bridge are not designed to accommodate the additional traffic in the form of cars and pedestrians that this development would generate.

11.8.12. I have already referred to the restrictions of 400 units over the lifetime of the plan and applications of no more than 40 units per time. Whilst these suggested numbers do not impose strict limits on development in the area, they are applied for sensible reasons such as in this case, where the proposed traffic generation would be far in excess of what the local network can accommodate. Smaller scale developments can be more easily accommodated with any necessary improvements likely to be modest and easier to achieve.

11.8.13. The stated inability of the Local Authority to adequately provide for a footpath network is noted and from the site visit it was clear that the area around the Dry Bridge was very restricted and walking in the area was somewhat hazardous. I also note that there were relatively long gaps in the footpath network and safe walking was not possible. I must also add, again, that the topography of the area would significantly reduce the ability to walk in the area on a regular basis.

11.8.14. For the reasons of increased traffic, congestion, road safety and unacceptable layout, I recommend that permission be refused for the proposed development.

11.8.15. **Public Transport:** The existing public transport service is primarily in the form of the train service from Cork to Cobh/ Midleton with a service provision of two trains per hour off peak and four per hour in the peaks. The off-peak train service is unbalanced with two trains in a 15-minute period and then 45 minutes for the next service; peak services obviously provide a better spread with four per hour. Trains are operated in two coach sets with seating capacity for 130 people (from [www.irishrail.ie](http://www.irishrail.ie)) and a standing capacity far in excess of this. I note that significant improvements are proposed under the Cork Metropolitan Area Transport Strategy (CMATS) 2040, with increased service frequency and electrification of the railway line.

11.8.16. Bus service provision is limited at present. Glounthaune is served by a number of bus routes that operate between East Cork and the city centre, but these operate on an infrequent basis. I note that the Cork Bus Connects Plan provides for a service every 30 minutes through Glounthaune.

11.8.17. In general, the public transport provision in Glounthaune is good, though it cannot be described as high frequency. The major concern remains the issue of how to access the station from the subject site without use of the car.

11.8.18. **Car Parking:** This is outlined in the Statement of Consistency and demonstrated further on Drawing No. 20151/P/006 – Proposed Vehicle Parking Allocation. Houses are provided with 2 spaces per unit, townhouses with 1.5 spaces and apartment 1.25. The parking provision is below the standards set out in the Cork County Development Plan in terms of the townhouses and apartments. I note this and the issues addressed further in the Material Contravention Statement, however, I have no concerns regarding the car parking provision. The Planning Authority noted the shortfall but did not raise it as an issue in the reasons for refusal.

11.8.19. **Bicycle Parking:** The proposed development provides for a total of 138 bicycle parking spaces, and this is in accordance with the requirements of the Cork County Development Plan.

11.8.20. **Public Lighting:** I note the report of the Cork County Council public lighting section and I have no concerns regarding the provision of a suitable network to serve the subject site.

11.8.21. **Access to the apartments:** The proposed apartments are to be accessed by vehicles over an extension of the existing road over the pedestrian/ cycle greenway to the front of the apartment block. This will result in a section of the greenway, circa 50 m been reduced in width and the western access to the greenway would be dominated by a vehicular access.

11.8.22. The impact on the greenway was raised as an issue of concern in a number of the observations. From the site visit, it was apparent that this greenway was well used by walkers and the western end in particular seemed to be popular with people eating food from the nearby supermarket. The Planning Authority oppose the use of the greenway as part of the access to this section of the development and have included it in their third recommended reason for refusal. As they outline, the access also serves the proposed commercial unit and traffic movements could be significant depending on the end user of this unit.

11.8.23. **Conclusion on Transportation, Traffic, Parking and Access:** The development is located in an area where limited investment has been made in the

road network. The proposed development relies heavily on the train service as the primary form of transport in the area. Car and bicycle parking provision is appropriate to the scale and nature of development proposed.

11.8.24. As the local road network is limited and the Local Authority have described this as substandard and would give rise to traffic congestion and hazard, I recommend that permission be refused for the proposed development for these reasons. The reliance on sustainable forms of transport is over emphasised when reality is that the car will be the dominant form of transport. I also have a significant concern with the use of part of the greenway as an access to the apartment block and associated units to the south of the site.

## 11.9. Infrastructure and Flood Risk

11.9.1. **Water Supply and Foul Drainage:** Full details of water supply, foul drainage and surface water drainage are provided in the Infrastructure Report prepared by AECOM; I have had full regard to this report and the associated drawings in relation to these aspects of the development.

11.9.2. Irish Water have reported no objection to this development in relation to the connection to public foul drainage and water supply systems. An additional 400 m of pipe will be required to connect into the existing foul drainage network. No upgrade works are required in relation to the connection to public water network. The applicant has engaged with Irish Water and has submitted design proposals. Irish Water has issued a Statement of Design Acceptance and conditions are recommended in the event that permission is granted.

11.9.3. **Surface Water Drainage:** Full details of the proposed surface water drainage design are provided in the 'Infrastructure Report' prepared by AECOM. It is reported that existing surface water drainage systems have capacity issues in the vicinity of Glounthaune station. The proposed surface water drainage system includes an attenuation tank, permeable paving and a green roof on the apartment block.

11.9.4. **Flood Risk:** A 'Site-Specific Flood Risk Assessment' – has been prepared by AECOM and is included with the application. There are no waterbodies within, or which border the subject site. The site comprises of a greenfield site with a



stated area of 13.87 hectares. Full regard was had to 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Guidelines, 2009).

11.9.5. The assessment considered all relevant types of flooding as follows:

- Fluvial Flood Risk: There are no significant watercourses within or adjoining the subject site. As fluvial flood risk mapping is not available it is considered that the site is located within Flood Zone C. The location within Flood Zone C means there is no requirement to prepare a justification test.
- Pluvial Flood Risk: The topography of the site ensures that there is good drainage at times of heavy rainfall. The risk of pluvial flooding is considered to be low.
- Coastal Flooding: None on or adjacent to the site. A site flooded in October 2004, but this was to the west of the subject lands. The site is located within Flood Zone C in relation to coastal flooding.
- Groundwater Flooding: Geological Survey Ireland (GSI) has undertaken an assessment of groundwater flood risk and the available mapping does not indicate any groundwater flooding within or surrounding the site. The risk of flooding from groundwater is considered to be low.

Full regard has been had to climate change and in relation to 'Freeboard' it is recommended in the report that all finished floor levels of the proposed development be at least 500mm above the predicted maximum 1 in 100-year fluvial flood level or the 1 in 200-year coastal flood level. This recommendation is reflected in the proposed development layout.

11.9.6. The submitted report raises no issues of concern. I am satisfied that the applicant has considered all potential sources of flooding. I note that comments were made in third party observations that the site may be prone to flooding, however no detail of this was provided and I did not see any evidence of flooding on the day of the site visit. I am satisfied that the development of this site, in full accordance with the submitted details, will not impact on existing adjacent houses through flooding.

11.9.7. The CE report does not raise any concerns about the proposed drainage of the site (foul and surface water) and the provision of a water supply to serve the development.

11.9.8. **Conclusion on Infrastructure and Flood Risk:** The site is served by a public water supply and the public foul drainage network. As noted, infrastructure has already been put in place to serve this site and the existing houses in the area. There is no concern regarding the potential for flooding of this site or to cause flooding on adjacent lands.

### 11.10. **Childcare**

11.10.1. The requirement under the 'Planning Guidelines for Childcare Facilities (2001)' was for one childcare facility for every 75 units, able to accommodate 20 children. Section 4.7 of the 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities' states 'One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms'.

11.10.2. The proposed development is for 289 units, consisting of a mix of apartments and houses. The development includes a childcare facility towards the centre of the northern section of the site and this provides for capacity for 67 children. This is considered to be acceptable and should be able to provide adequate capacity to serve this proposed development and the demands from the surrounding area.

11.10.3. **Comments of the Planning Authority:** No objection to the proposed creche. This should provide adequate capacity to serve this development and earlier phase 1 scheme, located to the west of the subject site.

11.10.4. **Conclusion:** In general, a development of this scale should provide for suitable childcare in accordance with the Childcare Guidelines. The proposed unit is considered to be acceptable and is located centrally where the greatest potential demand is.

### 11.11. Part V Social Housing Provision

11.11.1. A Part V Proposal has been provided in the form of a 'Part V Proposal' report by HWP. A total of 31 units are to be provided, in the form of 26 units consisting of townhouses, apartments and duplexes in the northern area of land and five apartments in the southern section. Full costing details are provided, and the location of the units are indicated on Drawing No. 20151/P/008.

11.11.2. The Planning Authority report refer to the Part V Proposal that is included with this application and they recommend that permission be refused. This is further detailed in the Housing Officer report and the concern relates to the fact that the Part V housing is not sufficiently pepper potted throughout the site. Further details would also be required to demonstrate that the proposed Part V provision is correct.

11.11.3. I note the 'Housing for All Plan' and the associated 'Affordable Housing Act, 2021' which requires a contribution of 20% of land that is subject to planning permission, to the Planning Authority for the provision of affordable housing. There are various parameters within which this requirement operates, including dispensations depending upon when the land was purchased by the developer. In the event that the Board decides to grant planning permission, a condition can be included with respect to Part V units and will ensure that the most up to date legislative requirements will be fulfilled by the development.

11.11.4. **Conclusion:** I note the comments of the Planning Authority and the supporting report from the Housing Officer. I am satisfied that the applicant can provide for adequate Part V housing in accordance with the requirements for such housing and this may be agreed by way of condition in the event that permission is to be granted for this development.

### 11.12. Comment on Submission/ Observations of the Cobh Municipal District

11.12.1. The views of the elected members were submitted alongside and included in the CE report. They are generally similar to those raised by third parties and dealt with under the relevant headings above. However, having regard to their important role in plan and place making, I have considered the strategic points raised by them, as outlined below. I have also noted and considered all of the issues raised

in the observations, therefore most of these varied issues have been addressed already in this report.

11.12.2. Concern was raised about the SHD process. As the application has been correctly submitted in accordance with the S.4 (1) of Planning and Development (Housing) and Residential Tenancies Act 2016, I will not comment any further on this issue.

11.12.3. The scale of the development on a steeply sloping site was raised as a concern by the members. Reference was made to concern regarding the scale of the development rather than the density. I have extensively commented on these issues in this report, and I concur with the comments made.

11.12.4. The local road network is not suitable for such a development. The road network consists of narrow, rural roads which are unsuitable for the proposed construction and operational stage traffic. Concern was raised about the impact on the 'Dry Bridge' and the presence of the railway station and greenway did not remove the need for a car. Concern was also raised about the reduction in car parking provision. This issue has been addressed in this report and again I concur with these comments.

11.12.5. Concern was raised about the reduction in car parking provision. I note this comment but as I have reported, the proposed provision is generally acceptable.

11.12.6. Concern was expressed that the local area did not have suitable social and community infrastructure to serve the proposed development. I note this issue, however the applicant has demonstrated that there are services in the area, but I also note from the third-party observations that there are no secondary schools in the immediate area. With regard to the availability of services, my concern would be over how they are accessed from this development.

11.12.7. The proposed walkway/ cycle route, which connects to the railway station via the greenway, is not suitable for the intended use due to the existing gradient of the site. I have extensively commented on this issue in my report, and I concur with the comments made.

11.12.8. Concern was expressed about the loss of trees that the proposed development will give rise to. I concur with this comment. The development requires a significant amount of engineering to provide the pedestrian/ cycle route,

and which pass through a large, wooded area. The proposed development would result in a significant loss of trees.

11.12.9. Welcome was had for the diversity of accommodation proposed as part of this development. I again agree with this comment. There is a good mix of houses, townhouses, apartments, and duplex units and as reported, the proposed residential units are visually attractive and would provide for high quality occupation.

11.12.10. The useability of the proposed open space areas was raised as an issue of concern. Due to the slope of the site, and the fact that much of these areas are heavily planted, their use by children for play would be heavily restricted. These areas of space may not comply with the requirements for amenity lands. Concern also about the continued maintenance of these spaces and the potential for anti-social behaviour within these areas. I again agree with the majority of the comments made and I have concern regarding the acceptability of the open space and its potential use. The issue of anti-social behaviour is not a planning matter, and the applicant has attempted to address this issue through the provision of suitable passive surveillance throughout the site.

### 11.13. Other Matters

11.13.1. **Building Life Cycle Report:** This has been prepared by Aramark and provides a generic overview of the lifecycle and maintenance works required for the proposed units. Internal and external elements are considered in this report. I note reference to O'Mahony Pike Architectural drawings, which are not relevant to this development, however the general comments made in this report are considered to be acceptable.

11.13.2. **Impact on Protected Structure – Ashbourne House:** A number of the received submissions referred to the impact of the development on the former gardens of Ashbourne House. These gardens are no longer associated with this house, and I note from the Cork County Conservation Officer report that there is an issue of split ownership over these gardens. The Conservation Officer reports that the gardens are neglected, and a sensitively designed pedestrian/ cycle route would be acceptable. The development as proposed results in a significant loss of trees

and has a negative impact on the garden and on the significance of the protected structure. A list of recommended conditions is provided.

11.13.3. I note the comments made by the Cork County Conservation Officer and in the third-party submissions. The proposed development will not directly impact on Ashbourne House but will seriously erode the character of the gardens associated with this house. I note that the gardens are in multiple ownership, but the proposed removal of trees would adversely impact on the character of the area. In particular the character of The Terrace would be significantly impacted upon.

11.13.4. **Loss of Significant Numbers of Trees:** The issue of tree loss has been referenced already in the report, but I would have a serious concern about the number of trees that are proposed for removal. This issue was raised as a significant concern in a number of the received third party submissions.

11.13.5. The extensive tree cover only applies to the southern part of the site and from an aerial view, only makes up a relatively small part of the site. Due to the topography of the site, the impact from tree removal on the character of this part of Glounthaune would be adverse and when viewed from distant points, the area will change from semi-rural/ woodlands to a suburban housing estate on a hill. I accept that the submitted landscaping proposal is of a high quality, but it will take some time for this planting to mature to an acceptable level.

11.13.6. The northern part of the site is currently in the form of fields with hedgerow boundaries and the removal of the vegetation here would only have a local impact. The loss of trees on the southern portion is more significant. In addition to facilitating the development of residential units and roads, the most significant reason for tree loss is the provision of the footpath/ cycle route. The meandering nature of this route results in the loss of trees and whilst I accept that the route proposed is sensible in terms of providing a link between the houses to the north and the railway station to the south, the impact on the visual character of the area will be significant.

11.13.7. The loss of trees and subsequent change in visual appearance will also be very evident from distant views and the character of the area will significantly change from a rural/ woodland view to a suburban housing estate on a prominent hill. It is accepted that the provision of housing generally results in a change in

character of an area, however, the scale/ area of the site that is directly impacted will result in a very evident change in the visual amenity of the area.

11.13.8. In conclusion, I would have serious concerns about the impact on the character of the area and on Ashbourne House from the loss of trees necessary to facilitate this development. The impact would be adverse and in addition to the immediate/ local impact, there would be a significant impact from more distant views.

11.13.9. **Demolition of House:** I have no objection to the demolition of an existing house that is on site, to the northern side of The Terrace. The house does not have any architectural merit worthy of its retention. This house is screened from view by trees/ vegetation and its removal would not have a negative impact on the visual amenity/ character of the area.

11.13.10. **Electricity Substations:** Four separate electricity substations are proposed, and their locations are provided on Drawing No. 20151/P/011B – Proposed ESB Sub Station Location Plan. I have no objection to the location of these substations.

#### 11.14. Material Contravention

11.14.1. The applicant has submitted a 'Material Contravention Statement' of the Cork County Development Plan 2014 – 2020 and the Cobh Municipal District Local Area Plan 2017 with the application. The public notices make specific reference to a statement being submitted indicating why permission should be granted having regard to the provisions s.37(2)(b).

There are three issues raised in the applicant's Material Contravention statement:

- The density at 33 units per hectare is in excess of the Medium B density range of 12 – 25 units per hectare and contravenes Cork County Development Plan Objective HOU 4-1.
- The proposed development does not comply with the car parking standards set out in the Cork County Development Plan and is contrary to the provisions of Section 10.4.8 of the plan.
- The proposed development exceeds the recommended scale of no development to exceed 40 units and the overall scale of Glounthaune to only increase by 400 units.

The applicant provides a justification for the proposed development and refers to National, Regional and Local Guidance throughout this document.

11.14.2. **Density:** Objective HOU 4-1 of the Cork County Development Plan 2014 – 2020 defines smaller towns as settlements with a population of less than 5,000 people; Glounthaune has a population of circa 1,400 according to the 2016 Census. Small towns allow for a Medium density range of 12 – 25 units per hectare; the proposed development provides for a density of 33 units per hectare. Table HOU 4-1 also allows for ‘Densities between 25 and 35 dwellings/ha will be considered where an exceptional market requirement has been identified’.

11.14.3. The applicant has not identified an exceptional market requirement but references national guidance on the need to provide for suitable scaled and density of development in established urban areas. Considering the vision to substantially increase the population of Glounthaune and the general demand for housing in the Cork City/ East Cork area, it is accepted that the proposed density of 33 units per hectare is appropriate within this range of 25 to 35 units per hectare.

11.14.4. The applicant justifies the stated density in terms of National and Regional guidance and refers to the National Planning Framework, NPO 33 promotes housing in locations that can support sustainable development and the Regional Spatial and Economic Strategy for the Southern Region promotes development which ‘supports the use of walking, cycling and public transport’. The proposed development is located within walking distance of a railway station and extensive walking and cycling provision is proposed on this site.

11.14.5. The applicant refers to the Design Standards for New Apartments: Guidelines and the Urban Development and Building Heights Guidelines which encourage appropriate development of housing with a higher density and compact form. Full regard is had to SPPR4 of the Building Heights Guidelines that seek to ensure that minimum densities are reached, provide for a greater mix of building heights and typologies, and avoid mono-type building typologies. The Sustainable Residential Development in Urban Areas – guidelines, promote a density of 20 to 35 in areas such as the subject site. The density of 33 units per hectare is within this range.



11.14.6. I have considered the issue raised in the applicant's submitted Material Contravention Statement and I do not advise the Board to invoke the provisions of s.37(2)(b) of the 2000 Act (as amended) as I do not consider that the development contravenes the Cork County Development Plan 2014 – 2020 and the Cobh Municipal District Local Area Plan, 2017 which includes Glounthaune. The density is in accordance with national guidance in the form of the Sustainable Residential Development in Urban Areas (2009) guidelines as issued under Section 28 of the Planning and Development.

11.14.7. **Car Parking Provision:** The applicant has proposed a total of 289 residential units, creche, commercial unit and community unit, which will be served by 484 car parking spaces. The Cork County Development Plan 2014 – 2020 requires that a total of 531 car parking spaces be provided; the requirement is provided under Table 1a of Appendix D. The applicant justifies this provision in terms of national guidance and in terms of proximity to Glounthaune railway station.

11.14.8. The most significant difference between the Development Plan and the proposed development in terms of car parking is as follows:

- Northern Area of land: 64 x two-bedroom townhouses provided with 1.5 car parking spaces per dwelling – CDP requires two parking spaces per house.
- Southern Area of land: 4 x two/ three-bedroom townhouses provided with 1 car parking space per dwelling – CDP requires two parking spaces per house.
- A total of 9 parking spaces are proposed to serve the 24 apartments in the block and the commercial/ community unit. The CDP requires 38 parking spaces.

11.14.9. I have considered the issue raised in the applicant's submitted Material Contravention Statement and I do not advise the Board to invoke the provisions of s.37(2)(b) of the 2000 Act (as amended) as I do not consider that the development contravenes the Cork County Development Plan 2014 - 2020. Table 1a Car Parking Requirements for New Development (Maximum per sq.m.) states under footnote 2 that:

'The parking requirement for residential development is a minimum standard and can be exceeded at the discretion of the developer, based on house type, design and layout of the estate'.

11.14.10. However, footnote 4 states:

‘A reduction in the car parking requirement may be acceptable where the planning authority are satisfied that good public transport links are already available and/or a Transport Mobility Plan for the development demonstrates that a high percentage of modal shift in favour of the sustainable modes will be achieved through the development’.

11.14.11. The proposed development is in close proximity to Glounthaune station and cycle/ pedestrian links are available/ proposed to serve this development.

Whilst there are serious concerns about this development, I am satisfied that the shortfall in car parking can be justified. The requirement for two car parking spaces for two-bedroom townhouses is excessive and I am satisfied that the provision of 1/ 1.5 spaces per two-bedroom townhouse is acceptable.

11.14.12. The greatest shortfall in car parking spaces is to the southern portion of the site serving the apartment and commercial/ community units. I consider that a reduced car parking provision in this area is acceptable having regard to the proximity of this part of the site to local services, Glounthaune station and the available bus service.

11.14.13. The Cork County Development Plan requires 531 spaces to serve the development and the applicant has proposed 484, a shortfall of 47 spaces. All houses will be provided with two spaces, townhouses with between 1 and 1.5 spaces and this is acceptable for two-bedroom units. I am concerned that this development will be car dominated due to the topography/ gradient of the site, however all houses to the north of The Terrace are provided with adequate car parking. The apartments to the south are where there is a shortfall in car parking, however these units are within easy walking distance of Glounthaune station and also the bus stops serving the limited bus service.

11.14.14. **Excessive scale of development:** Development is to be limited to no more than 40 units per application and Glounthaune is to grow by 400 units over the life of the plan. I have calculated that 212 units have been permitted in Glounthaune since the adoption of the Cobh Municipal District Local Area Plan in 2017 and the proposed development of 289 units would combined with that figure, exceed the proposed growth rate of 400 units over the lifetime of the plan.

11.14.15. These details are noted, and the applicant has again justified the proposed development in terms of National and Regional guidance and again relies on the proximity of the site to the Cork to Cobh/ Midleton railway line/ station at Glounthaune. The provision of 289 units in the form of one application allows for an integrated form of development and the provision of necessary infrastructure to serve the site. In addition, the single application allows for more certainty regarding the development of the site.

11.14.16. I have considered the issue raised in the applicant's submitted Material Contravention Statement and I do not advise the Board to invoke the provisions of s.37(2)(c) of the 2000 Act (as amended) as I do not consider that the development contravenes the Cork County Development Plan 2014 – 2020 or the Cobh Municipal District Local Area Plan, 2017.

11.14.17. The proposed development provides for an integrated form of development that primarily provides for housing at the northern section of these lands and also development that addresses The Terrace and the greenway. The development is designed to provide for a central pedestrian/ cycle route that integrates the entire area of land. Subdividing this development into seven separate schemes would not allow for such an integrated form of development and would give rise to piecemeal development.

## **12.0 Appropriate Assessment (AA)**

### **Stage 1 – Appropriate Assessment Screening**

12.1. The applicant has engaged the services of Kelleher Ecology Services Ltd., to carry out an appropriate assessment screening; the submitted report is dated December 2021.

12.2. The requirements of Article 6(3) as related to screening the need for appropriate assessment of a project under part XAB, section 177U and 177V of the Planning and Development Act 2000 as amended are considered fully in this section.

The areas addressed are as follows:

- Compliance with Article 6(3) of the EU Habitats Directive
- Screening the need for appropriate assessment

- Appropriate assessment of implications of the proposed development on the integrity of each European site

### **12.3. Compliance with Article 6(3) of the EU Habitats Directive**

12.3.1. The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site before consent can be given.

12.3.2. The subject site with a stated area of 12.7 hectares is located to the east of Glounthaune Village, north of Lough Mahon/ Harper's Island, on lands which are located to the north and south of the L-2970 local road which is locally known as 'The Terrace'. The subject lands are a greenfield site, comprising of former agricultural fields to the northern section and woodlands to the south. The site slopes from circa 110 m OD to the north to circa 5 m OD to the south.

12.3.3. The subject site is located within the Lee, Cork Harbour and Youghal Bat Catchment, Hydrometric Area 19 and also in the Southwestern River Basin District. There are no watercourses or other overground water features such as drains on the subject site. Lough Mahon (Harper's Island) transitional waterbody is located circa 40 m to the south of the site and is where two overlapping Natura 2000 are present:

- Cork Harbour SPA
- Great Island Channel SAC

Lough Mahon transitional waterbody is of moderate status and is at risk of deteriorating or being at less than good status in the future under the Water Framework Directive. A number of non-native invasive plant species were found on site during the AA survey.

12.3.4. The proposed development consists of a residential scheme of 289 residential units in the form of 201 houses and 88 apartments/ duplexes. In addition, a creche, community unit and a retail unit are to be provided with all necessary site and infrastructure works. An existing derelict house and some outhouses are to be demolished. A Site-Specific Flood Risk Assessment for the application lands has found that there is no history of flooding on site and that there is a low probability of flooding.

12.3.5. As already stated, there are no watercourses or other overground water-features on the study site. A proposed new surface-water drainage network will be constructed as part of the development. This will connect into the existing public storm-sewer network and which discharges into the Lough Mahon transitional waterbody, where the Cork Harbour SPA and the Great Island Channel SAC are located, via an existing outfall which is located to the south-west of the study site. Standard environmental controls will be implemented as part of the project to ensure the appropriate management and control of construction stage surface-water run-off which may result from construction on site. These controls are standard in construction and are provided to ensure the protection of the receiving environment. A list of these measures are provided, summarised as follows

**Spill Control Measures:**

- It is not proposed that oil/ fuels for the purposes of refuelling will be stored on site. Plant will be refuelled by an external contractor and road vehicles will be refuelled off-site. Procedures are provided in the event that there is a spill/ leak on site.

**Run-off Control Measures:**

- Dewatering measures will only be used where there are no suitable alternatives.
- If any groundwater is encountered during the construction phase, the following mitigation measure will be employed:
  - Dewatering by pumping to a suitable soakaway.
  - Exclude materials that may contaminate such as fuels/ hydrocarbons from sensitive parts of the site.

- If concrete is to be mixed on site, this will be done in a designated area that has an impervious surface.
- Existing drainage channels found on site will be retained where possible.
- Surface water connections will be made under the supervision of Irish Water/ Cork County Council.
- New surface water drainage will be tested and surveyed to ensure that ground water inflow does not occur.
- Surface water manholes and drains will be inspected and sealed to ensure that ground water inflow does not occur.
- Filters and silt traps will be provided to ensure the protection of the surface water network.
- Areas surrounding the site to be protected from sedimentation and erosion due to surface water run-off during the construction phase.
- Regular inspections of de-watering settlement tanks to be undertaken and additional treatment to be used if settlement is not adequate.
- Bunded areas to be provided around storage areas.
- Emergency spill kits will be provided close to the site of works.

12.3.6. Surface-Water Run-Off: Operational Phase: The proposed network will connect into the existing public network at Lough Mahon. Sustainable Drainage Systems (SuDS) includes green roofing, permeable paving, hydrocarbon interceptors and attenuation tanks that ensure that discharge will be at greenfield rates. The surface-water drainage network will be maintained in accordance with established guidance. Further details are provided in the documentation by AECOM.

12.3.7. Waste-Water/ Foul Effluent: Construction stage waste-water/ foul drainage will be managed through the use of portaloos and welfare units that are provided with their own storage tanks and waste will be removed by a licensed contractor. At operational stage, waste-water/ foul effluent will be addressed through a connection to the public foul drainage network, and which will be processed at the Cork City Wastewater Treatment Plant (WWTP). Treated water from this plant is discharged to Lough Mahon, which is downstream of the Cork Harbour SPA.

12.3.8. Other Wastes: These will be collected by licensed operators during the construction and operational stages of the development.

12.3.9. Lighting: Construction Phase: It is noted that the proposed development lands are removed from the designated sites in terms of separation distance of circa 40 m, the existence of woodland/ trees and also by the presence of a greenway, public road, and railway line, all of which are lit/ partially lit during the hours of darkness. No specific mitigation measures are proposed in relation to lighting during the construction phases of the development.

12.3.10. Lighting: Operational Phase: It is not proposed that aviation warning lights be provided on the apartment block that may disorientate waterbirds. The site is screened by trees and the already referenced road/ railway line/ greenway which contain artificial lighting. The 'waterbird population are already habituated to these lighting levels' and no specific mitigation measures in relation to lighting are proposed during the operational phase of the development.

12.3.11. The following, relevant, Natura 2000 sites are located within 15 km of the subject site, details are provided here:

<b>Name</b>	<b>Site Code</b>	<b>Distance from Site</b>
Great Island Channel SAC	(001058)	42 metres south of the site.
Cork Harbour SPA	(004030)	42 metres south of the site.
Blackwater River (Cork/ Waterford) SAC	(002170)	14 km to the north of the site. There is no link between the subject lands and this Natura 2000 site, and it can be excluded from further consideration at this time.

12.3.12. There are no ecological connections between the subject site and any of these Natura 2000 sites. There is a potential impact-receptor link between the subject lands and the SAC/ SPA through surface-water run-off into Lough Mahon (Harper's Island) and construction stage surface-water run-off could also reach

Lough Mahon through the public storm-water network. Operational storm-water could also enter this area through the public network.

12.3.13. Construction stage waste-water/ foul drainage, prior to connection to the public foul drainage system, will be managed through the use of portaloos and welfare units that are provided with their own storage tanks and waste will be removed by a licensed contractor. There is no impact-receptor pathway between the construction stage waste-water and any Natura 2000 site and therefore there will be no significant effect from foul effluent on designated sites.

12.3.14. At operational stage, waste-water/ foul effluent will be addressed through a connection to the public foul drainage network, and which will be processed at the Cork City Wastewater Treatment Plant (WWTP). Treated water from this plant is discharged to Lough Mahon, some 4 kilometres downstream of the Cork Harbour SPA. The Great Island Channel SAC is circa 550 m north-east of the wastewater treatment plant discharge point. An assessment of the conservation status of the SAC does not highlight any potential impacts arising from tidal/ wind movements from the Cork City WWTP's discharge point as a significant point of concern. No significant adverse effects to the Great Island Channel SAC are considered likely in relation to waste-water/ foul effluent from the proposed development. The Cork City WWTP is not currently compliant in relation to Total Nitrogen and Phosphorous, although ambient monitoring of transitional and coastal receiving waters indicates that discharge from the WWTP does not have an observable negative impact on the water quality or the WFD status of the receiving waters and no mitigation measures are required. The WWTP has adequate capacity to process the additional organic loading of 1,168 PE from the development at full operational stage. Irish Water have confirmed that the proposed foul connection can be facilitated and have raised no issues in relation to the operation of the WWTP.

12.3.15. The site does not support habitats of ex-situ ecological value for qualifying interest species within the SPA as the lands are dominated by recolonising bare ground, woodland and associated hedgerows/ treelines that obscure the view of the estuary from the subject site. No qualifying interests of the SPA were recorded during the field surveys undertaken by the applicant and the subject site is not known to be of importance for waterbirds.



No significant effect due to disturbance/ displacement on qualifying species (Cork Harbour SPA – waterbird species) are considered likely during the construction and operational phases of the proposed development. Noise levels are likely to increase during the construction phase, but it is considered that existing noise from the road/ railway will outweigh any such generated from the proposed construction phase of development. Impacts on qualifying interest waterbirds within the Cork Harbour SPA are not likely to occur due to these existing noise sources been greater than that likely from the proposed construction works. No mitigation measures are therefore required.

12.3.16. Consideration is given to disturbance/ displacement of fauna, that are listed as qualifying interests of a designated site, through noise and or visual impacts from the development. There is no impact - receptor pathway in relation to disturbance/ displacement for the Great Island Channel SAC as the Conservation Objectives refer to habitats and not fauna.

12.3.17. A number of non-native invasive species were found on the study site. A dedicated 'Plants Survey and Management Plan' has been developed in response. There are no over-ground water-features on the study site that could act as a conduit for the spread of these invasive species into the nearby transitional waterbody and the associated Natura 2000 sites. There is no impact-receptor pathway in relation to potential habitat loss/ damage effects arising from the spread of invasive plants to either the Cork Harbour SPA or the Great Island Channel SAC.

12.3.18. The Site-Specific Flood Risk Assessment prepared by AECOM concludes that the site does not have a known history of flooding and is within a low probability flooding area and a low risk of pluvial and groundwater flooding. The development will not increase flood risk elsewhere and no adverse effects on the SAC or SPA are considered likely.

12.3.19. The following are the qualifying interests and conservation objectives of these two sites. Note that these sites overlap each other:

<b>Great Island Channel SAC (Site Code 00105)</b> – 42 metres to the south of the subject site. This SAC extends from Little Island to Midleton.
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CO - To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in Great Island Channel SAC.
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Qualifying Interests:

1140 Mudflats and sandflats not covered by seawater at low tide

1330 Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

**Cork Harbour SPA (Site Code 004030)** - 42 metres to the south of the subject site. Cork Harbour is of major ornithological significance, being of internal importance due to the numbers of wintering birds – more than 20,000. Several species are listed on the Annex I of the EU Birds Directive.

CO - To maintain the favourable conservation condition of Little Grebe in Cork Harbour SPA

Qualifying Interests:

A004 Little Grebe *Tachybaptus ruficollis*

A005 Great Crested Grebe *Podiceps cristatus*

A017 Cormorant *Phalacrocorax carbo*

A028 Grey Heron *Ardea cinerea*

A048 Shelduck *Tadorna tadorna*

A050 Wigeon *Anas penelope*

A052 Teal *Anas crecca*

A054 Pintail *Anas acuta*

A056 Shoveler *Anas clypeata*

A069 Red-breasted Merganser *Mergus serrator*

A130 Oystercatcher *Haematopus ostralegus*

A140 Golden Plover *Pluvialis apricaria*

A141 Grey Plover *Pluvialis squatarola*

A142 Lapwing *Vanellus vanellus*

A149 Dunlin *Calidris alpina alpina*

A156 Black-tailed Godwit *Limosa limosa*

A157 Bar-tailed Godwit *Limosa lapponica*

A160 Curlew Numenius arquata
A162 Redshank Tringa totanus
A179 Black-headed Gull Chroicocephalus ridibundus
A182 Common Gull Larus canus
A183 Lesser Black-backed Gull Larus fuscus
A193 Common Tern Sterna hirundo
A999 Wetlands

12.4. **Consultation:** The applicant consulted with Inland Fisheries Ireland (IFI) who requested that Irish Water demonstrate that there is adequate capacity in the WWTP, so as to ensure that the plant does not overload either hydraulically or organically and in turn may give rise to pollution enters waters. In addition, IFI ask that there be no interference with watercourses or banks through bridging, draining, or culverting. As reported, Irish Water have raised no issues in relation to the WWTP in terms of operation and/ or capacity.

#### 12.5. **Screening Assessment**

12.5.1. In determining the Natura 2000 sites to be considered, I have had regard to the nature and scale of the development, the distance from the site to the designated Natura 2000 sites, and any potential pathways which may exist from the development site to a Natura 2000 site. The site is not directly connected with, or necessary to the management of a Natura 2000 sites. The impact area of the construction phase would be limited to the outline of the site.

12.5.2. In terms of the zone of influence, I would note that the site is not within or immediately adjacent to a European site and therefore there will be no loss or alteration of habitat, or habitat/ species fragmentation as a result of the proposed development.

12.5.3. I am satisfied that there will be no significant effects arising from the development on designated sites due to foul drainage at construction/ operational phases; due to disturbance from noise, lighting and loss of habitat at construction/

operational phases; and no loss of habitat during the construction/ operational phases.

12.5.4. There is potential at the construction phase, for surface water run-off impacts in relation to the Cork Harbour SPA and the Great Island Channel SAC. Having examined the assessment submitted and further to my own examination, I consider effects on Great Island Channel SAC (001058) and Cork Harbour SPA (004030) cannot be ruled out without further analysis and assessment.

## **12.6. Appropriate Assessment Screening Determination**

12.6.1. The proposed development was considered in light of the requirements of Section 177U of the Planning and Development Act 2000 as amended. Having carried out Screening for Appropriate Assessment of the project, it has been concluded that the project individually (or in combination with other plans or projects) could have a significant effect on Great Island Channel SAC (001058) and Cork Harbour SPA (004030), in view of these sites' Conservation Objectives, and Appropriate Assessment (and submission of a NIS) is therefore required.

12.6.2. I confirm that the Great Island Channel SAC and Cork Harbour SPA, which are screened in for appropriate assessment, are included in the NIS prepared by the project proponent.

12.6.3. The possibility of significant effects on other European sites has been excluded on the basis of the nature and scale of the works proposed, scale of intervening distances involved, lack of a direct hydrological link, and the lack of substantive ecological linkages between the proposed works and the site in question.

12.6.4. In reaching the conclusion of the screening assessment, no account was taken of measures intended to avoid or reduce the potentially harmful effects of the project on any European Site.

## **12.7. Natura Impact Statement (NIS)**

12.7.1. I am satisfied that the submitted NIS is in accordance with current guidance/ legislation/ best practice and the information included within the report in relation to baseline conditions and potential impacts are clearly set out and supported with sound scientific information and knowledge. The NIS examines and

assesses the potential adverse effects of the proposed development on Great Island Channel SAC (001058) and Cork Harbour SPA (004030), primarily due to their proximity to the subject site, and the significant gradient of the site. As noted in the AA Screening, all other European designated sites can be excluded from the need for further assessment.

12.7.2. The NIS identifies and assesses possible adverse effect of the proposed development on specific QIs and SCIs of Great Island Channel SAC and Cork Harbour SPA section 4 of the report. Details of mitigation measures, how, and when they will be implemented, are also detailed in Section 4 of the NIS.

In summary the following issues are considered:

- Indirect Habitat Loss or Deterioration: There is a potential impact-receptor pathway between the study site and the Great Island Channel SAC (001058) and Cork Harbour SPA (004030) in relation to surface-water run-off at the construction and operational phase of the development.

This is further detailed as follows:

- Surface-water run-off: Construction Phase: This phase will include site activities such as clearance, vegetation removal, demolition of structures, excavation/ earthworks, importation of materials/ equipment and use of equipment with required refuelling. Such works could give rise to silt and other contaminant discharge into Lough Mahon (Harper's Island) transitional waterbody through the public storm-water network, which currently outflows at this point. The SAC and SPA overlap here. Standard environmental measures will be employed to ensure the appropriate management and control of construction phase surface-water run-off that may arise. These are detailed further in the mitigation measures of this report.
- Surface-water run-off: Operational Phase: Surface-water will also be discharged into Lough Mahon (Harper's Island) transitional waterbody through the public storm-water network. This will be managed and controlled prior to discharge into the environment. Such measures as SuDS drainage design, green roofs, permeable paving, interceptors, and

attenuation tanks will be employed in the development. Mitigation measures are detailed further in this report.

12.7.3. Cumulative or In-combination Effects: Cumulative impacts could include construction/ operational related surface-water and construction/ operational related foul effluent inputs, where the qualifying interests associated with Cork Harbour SPA and Great Island Channel SAC could be impacted through hydrological or water quality impacts such as increased siltation, nutrient release and through contaminated run-off arising from other developments.

12.7.4. The proposed development is the second phase of residential development in accordance with a Masterplan developed by Deady Gahan Architects in 2017; construction has commenced on the first phase to the west of the subject site. An extension to this permitted development has recently been permitted. Other developments in the area include a permitted cycle/ pedestrian (Kilcoolishal to Carrigtwohill via Glounthaune), and other permitted developments including 94 units under PA Ref. 21/5072, 12 units under 21/4622 and an SHD of 174 units under ABP Ref. 301197-18.

12.7.5. The Cork County Development Plan provides an objective (Objective WS 5-1) for the management of surface-water in new developments through the inclusion of SuDS and provision of suitable stormwater infrastructure. This is restated in the Cobh Municipal District Local Area Plan which incorporates the Glounthaune area (Objective LAS-01) and this plan also provides for the protection of the SPA and SAC in relation to new development in the area. The proposed development includes a SuDS surface-water management strategy and also green roofing, permeable, hydrocarbon interceptors and attenuation tanks.

12.7.6. Subject to all other developments in this part of Cork County adhering to all standard environmental practices in relation to soil and water management during the relevant construction and operational phases, then significant adverse cumulative effects are considered unlikely in relation to water-features and associated designated nature conservation sites. The proposed environmental management/ controls integrated into this project will ensure that adverse effects related to cumulative and in-combination impacts are unlikely to arise as a result of this proposed development.

**12.7.7. Mitigation measures relevant to the protection of the Natura 2000 site:**

The applicant has proposed a number of mitigation measures that will be integrated as part of the proposed development, and which will be specific to this site.

These are listed as follows:

- **Surface-Water Run-Off - Construction Phase:** A number of construction related run-off controls are proposed as part of the development.

The following spill control measures are proposed:

- Oil/ fuels for refuelling reasons are not proposed to be stored on site.
- Onsite plant to be refuelled by external contractor.
- Road vehicles to be fuelled off site.
- Procedures are listed in the event that there is a spillage on site.

The following run-off control measures are proposed:

- Existing surface water drainage channels will be retained where possible.
- Surface water drains to be provided will be tested and survey prior to commissioning.
- Surface water connections will be provided under the supervision of Cork County Council/ Irish Water.
- Surface water manholes and drains to be inspected and sealed to ensure that uncontrolled ground water inflow does not occur.
- Filters and silt traps to be provided.
- Surrounding areas to be protected from sedimentation and erosion from surface water run-off during the construction phase. Surface water discharge will be managed and controlled during the construction phase of development, until such time as the permanent surface water drainage system is complete.
- Bunded areas to be used where required.
- Emergency spill kits to be provided in close proximity to works underway.

- Surface-Water Run-Off - Operational Phase: Appropriate run-off measures will be provided within the proposed development. These include the provision of green roofing, an appropriate surface water drainage design, interceptors, and attenuation tanks. Maintenance of the drainage system will be carried out on an ongoing basis.

12.7.8. **Operation of the Mitigation Measures:** The mitigation measures have been developed in accordance with a list of current policies, regulations and guidelines provided by the applicant under Section 4.3 of their report. The mitigation measures will be implemented appropriate to the stage of development underway at the time and will be maintained on an ongoing basis. The applicant indicates that an Emergency Response Plan will be compiled prior to the commencement of development.

12.7.9. If a mitigation measure fails, the source of contamination will be removed from site as a matter of urgency by a suitably qualified contractor and the site will be closed until this issue is addressed in full/ as appropriate. In the case of a significant mitigation failure, the Health and Safety Authority, Fire Department and County Council will be notified as required.

12.7.10. **Appropriate Assessment Conclusion:**

12.7.11. The proposed residential development at Lackenroe, Glounthaune has been considered in light of the assessment requirements of Sections 177U and 177V of the Planning and Development Act 2000 as amended.

12.7.12. Having carried out screening for Appropriate Assessment of the project, it was concluded that it may have an adverse effect on European designate sites, Cork Harbour SPA (site code 001058) and Great Island Channel SAC (site code 004030). Consequently, an Appropriate Assessment was required of the implications of the project on the qualifying features of those sites in light of their conservation objectives.

12.7.13. Following an Appropriate Assessment, it has been ascertained that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of Cork Harbour SPA (site code 001058) and Great Island Channel SAC (site code 004030). in view of the sites Conservation Objectives.



12.7.14. This conclusion is based on:

- A full and detailed assessment of all aspects of the proposed project including proposed mitigation measures and monitoring in relation to the Conservation Objectives of Cork Harbour SPA (site code 001058) and Great Island Channel SAC (site code 004030).
- Detailed assessment of in combination effects with other plans and projects including historical projects, plans and current proposals.
- No reasonable scientific doubt as to the absence of adverse effects on the integrity of Cork Harbour SPA (site code 001058) and Great Island Channel SAC (site code 004030).

12.7.15. I have had full consideration of the information, assessment and conclusions contained within the NIS. I have also had full regard to National Guidance and the information available on the National Parks and Wildlife Service (NPWS) website in relation to the identified designated Natura 2000 sites. I consider it reasonable to conclude that on the basis of the information submitted in the NIS report, including the recommended mitigation measures, and submitted in support of this application, that the proposed development, individually or in combination with other plans or projects would not be likely to adversely affect the integrity of the Cork Harbour SPA (site code 001058) and Great Island Channel SAC (site code 004030), in view of the sites Conservation Objectives.

## 13.0 Environmental Impact Assessment

13.1. This application was submitted to the Board after the 1st of September 2018 and therefore after the commencement of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 which transpose the requirements of Directive 2014/52/EU into Irish planning law.

13.2. The application was accompanied by an Environmental Impact Assessment Report (EIAR), which is mandatory for the development in accordance with the provisions of Part X of the Planning and Development Act 2000, as amended and Schedule 5 of the Planning and Development Regulations 2001 - 2015.

13.3. Item 10(b) of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 as amended, and section 172(1)(a) of the Planning and Development Act 2000 as amended provides that an EIA is required for infrastructure developments comprising of urban development which would exceed:

- 500 dwellings
- 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. A business district is defined as 'a district within a city or town in which the predominant land use is retail or commercial use'.

The development proposes 289 residential units and has a stated area of 13.87 hectares. It therefore requires mandatory EIA and an EIAR has been submitted with the application.

13.4. The EIAR is laid out as follows:

- Volume I of the EIAR provides a Non-Technical Summary of its content
- Volume II includes the Written Statement of the EIAR under the following chapter headings:

Chapter One – Introduction

Chapter Two – Project Description

Chapter Three – Alternatives Considered

Chapter Four – Landscape & Visual Impact

Chapter Five – Material Assets – Traffic & Transport

Chapter Six – Material Assets – Services, Infrastructure & Utilities

Chapter Seven – Land & Soils

Chapter Eight – Hydrology and Hydrogeology

Chapter Nine – Biodiversity

Chapter Ten – Noise & Vibration

Chapter Eleven – Cultural Heritage

Chapter Twelve – Air Quality & Climate

Chapter Thirteen – Population and Human Health

Chapter Fourteen – Interaction of Impacts

Chapter Fifteen – Summary of Mitigation Measures

- Volume III includes the Technical Appendices and are numbered in accordance with the chapter that they relate to.

A summary of mitigation measures is provided in Chapter 15 of Volume II.

13.5. A list of the EIAR team is provided in Chapter 1. Cumulative Impacts are summarised in Section 1.8 of Chapter 1.

13.6. Chapter 2 provides a project description. Chapter 3 lists the Alternatives Considered. Article 5(1)(d) of the 2014 EIA Directive requires the following: “a description of the reasonable alternatives studied by the developer, which are relevant to the development and its specific characteristics, and an indication of the main reasons for selecting the chosen option, taking into account the effects of the development on the environment.”

13.7. The details in Chapter 3 include alternative locations, do-nothing alternative, alternative uses and alternative layouts (A to E). A comparison of Environmental Impacts at Construction Phase and Operational Phase is provided in Chapter 3. It is considered that the issue of alternatives has been adequately addressed in the application documentation.

13.8. The likely significant direct and indirect effects of the proposed development are considered in the remaining chapters which collectively address the following headings, as set out in Article 3 of the EIA Directive 2014/52/EU:

- Population and Human Health
- Biodiversity (Flora and Fauna)
- Land, Soils, Geology and Hydrogeology
- Hydrology- Surface Water
- Air Quality and Climate
- Noise and Vibration
- Landscape and Visual
- Cultural Heritage- Architectural Heritage
- Cultural Heritage-Archaeology
- Microclimate-Daylight/Sunlight
- Microclimate-Wind
- Traffic and Transportation
- Material Assets- Waste
- Material Assets-Services
- Interactions and Cumulative Impacts
- Mitigation and Monitoring

13.9. I am satisfied that the EIAR has been prepared by competent experts to ensure its completeness and quality, and that the information contained in the EIAR, and supplementary information provided by the applicant, adequately identifies and describes the direct and indirect effects of the proposed development on the environment, and complies with article 94 of the Planning and Development Regulations 2000, as amended. Each chapter demonstrates the competency of the assessor, relevant guidance that they have considered, and the assessment criteria.

13.10. I have carried out an examination of the information presented by the applicant, including the EIAR, and the submissions made during the course of the

application. A summary of the submissions made by the planning authority, prescribed bodies and observers has been set out already in this report. This EIA has had regard to the application documentation, including the EIAR, the observations received, and the planning assessment completed above.

**13.11. Consultations:** Details of the consultations carried out by the applicant as part of the preparation of the application and EIAR are set out in the documentation submitted and these are considered to be adequate. I am satisfied that the participation of the public has been effective, and the application has been made accessible to the public by electronic and hard copy means with adequate timelines afforded for submissions.

**13.12. Assessment of Likely Significant Direct and Indirect Effects:** My assessment is based on the information provided by the applicant, including the EIAR, in addition to the submissions made during the course of the application, together with my site visit.

### **13.13. Landscape & Visual**

13.13.1. Chapter 4 of the EIAR is entitled Landscape & Visual and presents an assessment of the likely effects on the landscape and visual environment arising from the construction and operation of the proposed project. A summary of the proposed development, methodology and assessment criteria are provided. Landscape sensitivity is detailed in Table 4.1 of the EIAR under Very High, High, Medium, Low and Negligible and Table 4.2 details the Magnitude of Landscape Change. Significance of Effect is provided in Table 4-3, the Categories of Visual Receptor Sensitivity in Table 4-4 and Magnitude of Visual Change in Table 4-5. Other tables included are Table 4-6 Quality of Effect and Table 4-7 Duration of Effect.

13.13.2. The 'Existing Receiving Environment' is detailed in Section 4.3 of the EIAR. Objective 6-1 'Landscape' of the Cork County Development Plan 2014 - 2020 is referenced and which states:

- (a) 'Protect the visual and scenic amenities of County Cork's built and natural environment.

- (b) Landscape issues will be an important factor in all land use proposals, ensuring that a proactive view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability.
- (c) Ensure that new development meets high standards of siting and design.
- (d) Protect skylines and ridgelines from development.
- (e) Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments’.

13.13.3. The proposed development is located on a site that is within a High Value Landscape (HVL) in accordance with the Cork County Development Plan 2014 – 2020. A Draft Landscape Strategy was prepared in 2007 and the site falls within a Type 1: City Harbour and Estuary, landscape character area. The site is also bordered by a S42 – a Scenic Route to the north and S41 – The Terrace which runs east west through the site. Further details are provided in Table 4.9 of the EIAR. Objective GI 7-2 refers to Scenic Routes and GI7-3 refers to Development on Scenic Routes. Green Infrastructure is considered under Objectives GI 3-1 and GI 3-2. Objective HE2-5 refers to trees and woodlands and the following section of this objective is noted: ‘Where appropriate, to protect mature trees/ groups of mature trees and mature hedgerows that are not formally protected under Tree Preservation Orders’.

13.13.4. The submitted EIAR includes details of the Cobh Municipal District Local Area Plan, and which includes Glounthaune. Development up to 2023 should not exceed 400 units in total and no individual housing scheme should not normally exceed 40 units. The site is considered to be suitable for the development of new housing.

13.13.5. Section 4.3.2 of the EIAR details the Landscape and Visual Character of the area and the subject site. Residential is the predominant form of development in the area. The topography of the site and the steep climb from south to north is detailed. The submitted report details the subject site and the adjoining lands with particular reference to the road known as ‘The Terrace’ and the lands to the south of the site. A Summary of Landscape Characteristics is provided in Section 4.3.3.

13.13.6. A total of 14 Viewpoints have been identified and assessed by the applicant. The details of these are provided in Table 4-10 and Figure 4.17 indicates their location on a site plan.

13.13.7. Landscape Sensitivity is considered in Section 4.4.1 under Section 4.4 Landscape and Visual Effects. The following are the effects on the landscape, summarised in tabular form:

<b>Phase of Development</b>	<b>Impacts</b>	<b>Significance of Effect</b>	<b>Duration</b>
Construction Phase	Site Clearance, vegetation removal and removal of a derelict cottage.  Construction Phase to last 48 months.	Magnitude of Change: Medium  Area: Local Impact  Effects: Medium	Short-term.
Operational Phase	Construction of 289 residential units, creche, commercial and community units, ESB substations (x4), all associated works and road network.  Removal of trees – 25 Category A, 60 Category B and 57 Category C.	Magnitude of Change: Medium in the northern section to High in the southern section of the site.  Impact on northern section is neutral.  Impact on southern section is greater an magnitude of impact is High due to tree removal.	Permanent

13.13.8. The Visual Effects during the Construction Phase are considered to be temporary and vary depending on the viewpoint. A total of 14 Photomontages have been prepared by GNET 3D and demonstrate the visual impact of the development when viewed from these points. The following are the results in summary, again in tabular form:

<b>Viewpoint</b>	<b>Visual Receptor Sensitivity</b>	<b>Proposed View</b>	<b>Magnitude of Change</b>	<b>Significance of Effect</b>	<b>Cumulative Effect</b>
1: View from the N25 south of the proposed development	View from a National Road is of Scenic Quality and Receptor Sensitivity is Medium	Primarily a view of several rows of houses above a dense woodland.	Introduction of a suburban element to the upper slopes of a wooded hillside. Change is moderate in extent.	Medium magnitude of change and a Medium visual receptor impact – Moderate effect over the long term. Neutral in quality	Other development in the area has been considered and results in a Not Significant to Slight, adverse, cumulative visual effect.
2: View from L3004 at Glounthaune, east of the proposed development	View of an urban setting, with some scenic qualities. Sensitivity is Medium.	Development not visible due to screening by vegetation and structures.	No Change	No Change	N/A
3: View from L3004 at Glounthaune, east of the proposed development	Pleasant view of a village with extensive vegetation and trees. Sensitivity is Medium.	Development not visible due to screening by vegetation.	No Change	None	N/A
4: View to the east along the	Scenic Quality due to	New building to the centre	Change is Medium.	Visual effect is Moderate,	None.



L3004 through Glounthaune.	the expanse of mature trees.  Sensitivity is Medium	of the view, adjacent to existing apartment building and some trees removed.		though tree removal is adverse and new building would be neutral. Some improvement due to new trees.	
5: View from 'The Woods', development east of the site	View from a road within a residential development – not scenic.  Sensitivity is Medium	No visibility of the proposed development	No Change	None.	N/A
6: View from the Terrace (Scenic Route) east of the proposed development	High scenic value due to the mature vegetation and lodge building.  Sensitivity is High	Loss of trees to the left and retained to the right, though some new tree planting.	High	Significant Effect and the quality of the change is considered to be adverse	N/A
7: View from the Terrace (Scenic Route) west of the proposed development	Scenic qualities due to the mature tree canopy. Sensitivity is High	New wall to the left and footpath to the right. Removal of some trees and other clearance.	Low	Moderate degree of change and a Slight effect. Quality of Effect is Neutral.	N/A
8: View from road in Anne Mount, west of the site	Pleasant Road with scenic qualities.  Sensitivity is Medium	Not Visible due to screening by vegetation.	None	None	N/A

9: View from local road to the north (Scenic Route) at site emergency access	Pleasant view with long distance views and is located on a scenic route. Sensitivity is Medium	Vegetation along the road is retained. New entrance and some dwellings are visible. Landscape beyond is obscured by new dwellings.	Low	Medium sensitivity combined with Low Magnitude of change gives a Slight Effect. Quality of Change is Adverse.	N/A
10: View from the junction of the local road and Priest's Hill east of the proposed development	Scenic route and has some scenic qualities, long distance views apparent but not dominant. Sensitivity is Medium to High.	Small part of the development will be visible. Glimpse of a building is visible through the branches of a mature tree to the right of view.	Negligible.	Significance is Imperceptible and quality is Neutral.	N/A
11: View from Priest's Hill, east of the proposed development	Pleasant rural view, but not scenic. Sensitivity is Medium	View of the roofs of the proposed houses.	Negligible	Not Significant. Quality of effect is Neutral.	N/A
12: View from Cois Chuain, west of the proposed development	A pleasant view, screened by vegetation. Sensitivity is Medium	Vegetation screens much of the site and the topography also restricts views.	Negligible	Imperceptible visual effect and quality of effect is Neutral	Imperceptible

13: View from junction of Ballynaron, west of proposed development	No scenic qualities. Sensitivity is Medium	Gable end of a very small number of houses.	Negligible	Not Significant and the effect is Neutral	N/A
14: View from local road (scenic route) east of proposed development	Some long distance views. Sensitivity is High	Terraced houses will be visible and will be slightly higher than existing houses.	Medium	Moderate effect and quality of effect is Neutral	N/A

Full account has been taken of other permitted developments and the cumulative impact on Visual and Landscape Effects have been considered.

13.13.9. Section 4.5 refers to Avoidance/ Remedial or Mitigation Measures and these include at the Construction and Operational Phases of the development. The potential impact on Ashbourne House to the south of the site has been considered.

In Conclusion, the EIAR finds that the impact on the northern part of the site will be Moderate and Neutral and the southern part, which is more sensitive, will undergo an impact of High Magnitude due to the loss of trees/ vegetation. The impact on the landscape is considered to be Significant and Adverse.

13.13.10. **Submissions and Observations:** A number of the observations referred to the impact on the setting and character of Glounthaune. The loss of trees, the use of heavily engineered solutions to provide the footpath and cycle way and the actual provision of the residential units, would all impact on the visual amenity of Glounthaune.

13.13.11. The Planning Authority also expressed concern about the visual impact of this development and the submitted EIAR. They considered that the submitted Visual Impact Assessment was not comprehensive enough and made particular reference to longer viewpoints of the development. They consider that the proposed development is likely to have a significant and detrimental impact on the High Value

Landscape of the site. The visual impact of the proposed development is considered to be unacceptable to the Planning Authority.

13.13.12. **Assessment:** I have considered all of the written submissions made, including that from the Planning Authority, in relation to Landscape & Visual. I also agree with the Planning Authority that the submitted details are somewhat limited and longer distance views should also have been provided in order to ascertain the visual impact from further away.

13.13.13. The proposed development as submitted, would significantly impact on the character of this section of Glounthaune. The development is large in terms of unit numbers and also in terms of the area of land that it impacts upon. It is difficult to identify the true potential visual impact. The submitted photomontages provide for a time when the trees/ vegetation is in full leaf/ full growth and therefore provide for a significant amount of screening. A number of the submitted views including 2, 3, 5, 8, 10, 11, 12 and 13 indicate little if any visual impact. I am therefore concerned that the true visual impact is not presented. View 1 does demonstrate that the development will change the visual character of the area from one dominated by trees to an area dominated by suburban housing. The quality/ detailing of these units cannot be qualified from this view point.

13.13.14. The proposed development will result in the loss of a significant number of trees and although mitigation is proposed in the form of replacement planting, it will take a significant period of time for the replacement trees to grow to the same extent as those currently in place. The applicant has clearly outlined the need for the tree removal; however, it is considered that the topography of the site and in particular the steep slopes, require significant engineering features (retaining walls, roads, foot/ cycle paths) that are to be provided at the expense of existing vegetation. As result the visual impact will be adversely affected when viewed locally and from more distant points.

13.13.15. In conclusion, I am not satisfied that the submitted photomontages are extensive and that a true impact on the visual character of this part of Glounthaune is not provided. The available information indicates that the development will have a significant impact on the visual character and that this will be adverse in a number of sections.

### 13.14. Material Assets – Traffic & Transport

13.14.1. Chapter 5 of the EIAR deals with Traffic & Transport. A Traffic & Transport Assessment, DMURS Consistency Statement and Road Safety Audit have been submitted with the application.

13.14.2. The existing environment is detailed under Section 5.3. The area is served by a road and railway with Glounthaune station to the south east of the site. The area is also served by a limited bus service. Table 5.1 of the EIAR details development in the vicinity of the subject site. Details of existing junction are also provided in the form of photographs and layout/ traffic movement plans.

13.14.3. The section on Impact Assessment considers the Construction and Operational Phases in addition to Cumulative Impacts. Construction traffic will see an increase in HGV movements by 7% or a maximum of 15 HGV's importing to the site on a daily basis. Mitigation measures are included in the CEMP and in Section 5.5.2.1. The Operational Phase is included under Section 5.5.3. Traffic generation is based on the TRICS database. A reduction in traffic generation of 23.5% has been applied to the residential element of the development due to the use of sustainable forms of transport and modal shift reasoning. Trip Distribution details are provided under Section 5.5.3.4 and Network Modelling Results under 5.5.3.5.

13.14.4. The submitted details indicate that Junction 6 operated within capacity up to the design year of 2041. The capacity/ operation of Junction 3 will reduce over time both with and without the proposed development. There may be a need for signalisation of this junction. Construction phase traffic will be slight and likely to occur, for the period of the construction phase. Operational phase traffic will also be slight and likely to occur. This will be a long-term impact.

13.14.5. Sustainable forms of transport are to be promoted in order to encourage a modal shift away from car use. Major accidents involving traffic associate with the development are not foreseen. Monitoring of traffic and greenway will be ongoing by the Local Authority and amendments can be made where identified. Further details are provided in Appendix 5-1.

13.14.6. **Submissions and Observations:** A number of the observations referred to concern about the increase in traffic in the area that this development will generate. The topography of the site and distance to the railway station would

impact on the expected numbers who would only use sustainable forms of transport. The proposed development is likely to be car dominated. Other concerns related to traffic safety at the Dry Bridge, unsafe routes, congestion and a lack of adequate car parking.

13.14.7. The Planning Authority referred to a number of issues with this aspect of the development and the Cork County Council Traffic and Transport Engineer has recommended that planning permission be refused for the proposed development. Cork County Council have Part 8 approval to provide for a high-quality pedestrian/ cycle route between Dunkettle and Carrigwohill along the L3004 through Glounthaune and this has not been considered in the submitted EIAR. Concerns were expressed about the proposed cycleways/ pedestrian routes in terms of design/ topography of the site

13.14.8. **Assessment:** The proposed development is very reliant on the presence of Glounthaune station, and the train service provided from there. Off peak service is two per hour (not evenly spread) per direction and four per hour in the peaks. I have a concern that the applicant has overemphasised the modal shift towards use of the train and of more concern is that residents will walk/ cycle to the station when I consider this to be unlikely. The provision of high-quality cycle/ pedestrian routes is a key element of this development; however, the topography of the site cannot be ignored and no matter what the quality of the routes are, the car is likely to be the dominant form of transport on site.

13.14.9. I cannot be certain that the submitted information provides an adequate assessment of traffic movements and in particular the use of cars and the consequent volume of traffic movements is likely to be far greater with a consequent impact on noise, dust and air quality.

### 13.15. **Material Assets – Services, Infrastructure & Utilities**

13.15.1. Chapter 6 provides an assessment of Material Assets in the form of Services, Infrastructure & Utilities. Supporting information is provided in the form of an Infrastructure Report, Constraints Study, Site Lighting Plan and a Site-Specific Flood Risk Assessment. The existing environment is described in terms of surface water drainage, wastewater drainage and water supply, electricity, natural gas and

telecoms. Access to all services is available though not all adjoin/ enter the subject site.

13.15.2. The proposed development will provide for surface water and foul drainage systems within the site. The wastewater system will connect into a public 225 mm diameter foul sewer. A new 150 mm diameter pipe will connect into the public water supply network to serve the development. Full details of this are provided in Section 6.3.3 of the EIAR. Electricity, gas and telecoms will be provided in accordance with the relevant utility operator requirements. Public lighting will also be provided throughout the site.

13.15.3. The Do-Nothing Scenario is not addressed in detail as this scenario would have a neutral impact on the environment under this section of the EIAR. Construction phase impacts include excavation, ground disturbance and potential for surface water contamination. The presence of workers on site will result in the need for sanitary facilities with a consequential need to dispose of waste from the site. Water demand will also exist. Operational phase impacts include the potential for surface water contamination, generation of waste that may impact on existing services such as wastewater treatment plant and an increase in water demand. Cumulative impacts have also been considered under Section 6.4.4.

13.15.4. A range of Mitigation Measures are provided under Section 6.5 of the EIAR. These refer to the construction and operational phases of the development. Monitoring will be undertaken during the construction and operational phases of the development. It is expected that any residual impacts would not be significant.

13.15.5. **Submissions and Observations:** Concern was expressed that the proposed development may put pressure on the public wastewater system and also that there is a potential for flooding on site. In addition, concern was raised about the impact of the development on surface water drainage.

13.15.6. Irish Water have reported no issues of concern in relation to water supply and foul drainage. The area is facilitated by both. No particular issues of concern were raised in the CE report. I note also that details in relation to public lighting have been provided by the Local Authority.

13.15.7. **Assessment:** The topography of the site gives rise to potential issues in relation to drainage however the details provided in the EIAR and supporting

documentation do not give rise to concern. The proposed surface water drainage system is acceptable and Irish Water have confirmed that there is capacity in the public foul drainage network and wastewater treatment plant to serve this development. No issues of concern were raised in relation to gas, electricity and telecoms provision.

13.15.8. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Material Assets – Services, Infrastructure & Utilities.

### **13.16. Land & Soils**

13.16.1. Chapter 7 of the EIAR refers to Land & Soils. The site description is provided under Section 7.2 Description of Existing Environment. The topography of the site is detailed, fall from 110 m OD to 3.30 m OD on a north to south axis. The predominant soil type is Till with some bedrock outcrop or subcrop. Soils & Subsoils are detailed under Section 7.2.2 and Bedrock Geology under 7.2.3. There are no recorded Geological Heritage sites within the proposed development lands. Two unaudited Geological Heritage sites are located approximately 2.5 km to the south west of the subject site. No incidences of ground contamination have been recorded on this site.

13.16.2. The predicted impact is considered under the 'Do-Nothing Scenario', the 'Construction Phase', the 'Operational Phase' and under 'Cumulative Impacts'. Construction Stage Impacts are detailed under Section 7.3.2 of the EIAR. Soil excavation, relocation of soils and compaction are identified. Materials including graded stone will be imported onto the site to facilitate the development. Mitigation measures will be carried out in accordance with the CEMP and a list of mitigation measures is provided. Residual impacts are considered to be non-significant following the implementation of mitigation measures.

13.16.3. Consideration is given under section 7.3.2.2 to 'Contamination of Soil/ Subsoil/ Bedrock by Leakages and Spillages' and a list of suitable mitigation measures is provided. Soil and Subsoil Compaction is detailed under 7.3.2.3. Human Health Effects are considered to be negligible.



13.16.4. No impact on soils and geology is expected during the Operational Stage of the development other than minor impacts such as reduced infiltration and therefore reduced recharge volumes entering the groundwater. Cumulative Impacts are summarised in Table 7-2.

13.16.5. Chapter 7 concludes that storage and handling of hydrocarbons/chemicals on site will be in accordance with best practice methods and with a full range of mitigation measures. Overall, it is considered that there will be no significant impacts on the land, soil and geology of the site. Suitable mitigation measures have been prepared.

13.16.6. **Submissions and Observations:** No particular issues of concern were raised by third parties or by the Planning Authority through the CE Report.

13.16.7. **Assessment:** The proposed development is for a residential scheme with a difficult topography for such a development. The proposed development provides for extensive earth works and a requirement to import additional materials onto the site to facilitate the development. The operational phase should not have any impact on soils or geology.

13.16.8. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Land & Soils.

### 13.17. Hydrology and Hydrogeology

13.17.1. The site is located within the South Western River Basin District (SWRBD) and specifically within the Lee, Cork Harbour and Youghal Bay catchment. There are no watercourses within the subject site. Lough Mahon (Harper's Island) is a transitional water body located approximately 70 m to the southern section of the subject lands. Full details are provided under Section 8.4.1 of the EIAR.

13.17.2. The GSI classify the bedrock underlying the site as a Locally Important Aquifer – Bedrock, which is Moderately Productive only in Local Zones. No karst features have been identified in the area. No groundwater wells or springs are recorded on the GSI Groundwater Data Viewer. The vulnerability rating of the

aquifer within the site is classified as 'Extreme'. The recharge efficient, which is the proportion of effective rainfall to groundwater, is 60% and the Water Framework Directive status for the local groundwater body in terms of water quality is 'Good'. The site does not directly impact upon any protected areas. Cork Harbour SPA and Great Island Channel SAC are within 15 km of the subject site. Details on Flow Measurements are provided under Section 8.4.7, Water Supply Sources under Section 8.4.8 and Amenities under Section 8.4.9.

13.17.3. A range of mitigation measures to be taken during the construction phase of the development are detailed under Section 8.5.1.1 of the EIAR. Monitoring will be undertaken during this phase of the development. It is not expected that the effects on water quality due to site excavation work will be significant.

13.17.4. Full consideration has been had to the 'Potential Release of Hydrocarbons during Construction Phase' – Section 8.5.1.2 of the EIAR. A full list of suitable mitigation measures is provided and the effects on surface water or groundwater quality are anticipated to not be significant. Similar assessment is done for potential 'Groundwater and Surface Water Contamination from Wastewater Disposal (Construction Phase)', the 'Release of Cement-Based Products' and the 'Potential Impacts on Hydrologically Connected Designated Sites'. No significant impacts on surface water, groundwater or water quality are anticipated.

13.17.5. Operational Phase Impacts (Section 8.5.2) are again addressed by suitable mitigation measures. The impact from the development in terms of flooding and water quality is considered to be not significant. There are no proposed emissions to ground and/ or surface water courses during the operational phase of the development and suitable mitigation measures are proposed.

13.17.6. Consideration is made to the 'Assessment of Potential Effects' under Section 8.6 of the EIAR and no negative impacts on water supply and potential flooding are foreseen. Flooding is considered further in the submitted Site-Specific Flood Risk Assessment. Cumulative Impacts is considered under Section 8.6.2 and also Table 6-2 of the EIAR. In conclusion no impacts of concern are foreseen, and suitable mitigation measures will be employed.

**13.18. Submissions and Observations:** No particular issues of significant concern were raised by the third parties in their observations, or by the Planning Authority through the CE Report.

13.18.1. **Assessment:** The submitted information demonstrates that the proposed development as submitted will not impact on Hydrology and Hydrogeology. There are no watercourses within the site and issues of water pollution are addressed in terms of appropriate mitigation measures.

13.18.2. I am satisfied that the identified impacts would be avoided, managed, and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Hydrology and Hydrogeology.

### **13.19. Biodiversity**

13.19.1. Desktop reviews and site visits were carried out to ascertain the baseline data for this Chapter of the EIAR. A Natura Impact Statement (NIS) has been prepared as part of the Appropriate Assessment process and details have been included in Appendix 9-5.

13.19.2. The assessment of the site has been undertaken in accordance with current relevant guidelines. A hedgerow appraisal, bird survey and mammal survey were undertaken. The hedgerow survey was carried out in April 2021 and full details of the other surveys are detailed in Sections 9.3.4 to 9.3.7.

13.19.3. The subject lands are not part of or adjacent to any designated site and it does not require any resources from any designated sites. The nearest sites are at the Lough Mahon (Harper's Island) transitional waterbody which is 42 m south of the subject site and which includes Great Island Channel pNHA, Great Island Channel SAC and Cork Harbour SPA. Cork Harbour Ramsar site also overlaps with these designated sites. There is a potential impact-receptor link between the subject lands and the designated sites through surface water run-off at construction and operational stages of the development. Effluent/ wastewater will not discharge to this waterbody. There is a potential impact-receptor pathway via effluent/ wastewater links between the subject site and Cork Harbour SPA, however Irish

Water have reported that the Wastewater Treatment Plant has adequate capacity to facilitate this development with appropriate levels of treatment. No significant effects are considered likely in relation to waste-water/ foul effluent.

13.19.4. There is no impact-receptor pathway in relation to disturbance/ displacement for the nearby Great Island Channel pNHA/ SAC. There are a number of invasive species present on the subject site and an Invasive Plants Survey and Management Plan has been developed. There are no over-ground water-features on the site that would act as a conduit for the spread of these species from site into Lough Mahon and hence there is no impact-receptor pathway in relation to potential habitat loss/ damage effects arising from the spread of invasive plants onto a designated site. A site-specific flood risk assessment has been carried out and no issues of concern are raised in terms of flooding on site or impact on adjoining sites arising from the development of this site.

13.19.5. The assessment of the site has found that there are no Annex 1 habitats listed under the EU Habitats Directive. Habitats are of lower-level importance and of no particular ecological value. No protected botanical species were found, and a number of non-native invasive species as listed on the Third Schedule of the 2011 European Communities (Birds and Natural Habitats) Regulations are present and are listed under Section 9.4.2 of the EIAR. Figure 9.3 provides a map of the Habitats found on site. The majority of the site is made up of former agricultural fields and which have been left unmanaged/ fallow. Full details of the lands are provided in Sections 9.4.2.1 to 9.4.2.8 of the EIAR. Details of the hedgerows on site are provided under Section 9.4.3 and Table 9.2 provides 'Hedgerow significance summary for each criteria and hedgerow'. A condition survey finds that Hedgerows 2 and 4 (two most significant sections of hedgerow proposed for removal) are in unfavourable condition. A lack of management has had a negative impact on their structure and continuity.

13.19.6. A total of 16 bird species were recorded and Table 9.4 provides a summary of the bird species that were recorded, and species have a widespread distribution in Ireland. The subject lands are considered to be of lower to higher local value for birds.

13.19.7. Seven non-volant mammal species were recorded on the subject lands. All are of least conservation concern and are relatively widespread and common nationally. The subject lands are considered to be of lower to higher local value for non-volant mammals.

13.19.8. A total of four bat species were confirmed during the subject site survey and Table 9.5 of the EIAR provides full details. Table 9.6 provides a 'Summary of the trees due for removal with bat roosting potential' and 11 out of 13 are considered to have a Low Bat Roosting Potential. The subject lands are considered to be of lower to higher local value for bats.

13.19.9. Table 9.7 provides a summary of other taxa species found on these lands. The southern section of the lands has a compromised biodiversity value due to the presence of invasive species. The subject lands are considered to be of lower to higher local value for other taxa.

13.19.10. The potential impacts of the development on biodiversity are considered in Section 9.5 of the EIAR. Indirect Habitat Loss impacts during the construction phase are detailed in section 9.5.1.1 and include surface water run-off and waste-water effluent discharges. Disturbance/ Displacement Impacts are detailed under Section 9.5.1.2 and the impact on designated sites is considered to be neutral.

13.19.11. Operational Phase Impacts are detailed under Sections 9.5.1.4 to 9.5.1.6 and again these are considered to be neutral. Impacts on Habitats & Flora are detailed under Section 9.5.2 and are neutral. Section 9.5.3 details the impact on Birds, Non-volant Mammals, Bats and Other Taxa. Impacts are neutral over this phase of development.

13.19.12. Section 9.5.4 considers the Do-Nothing Scenario and whilst the lands could be left as is, or returned to agricultural use, it is most likely that some form of residential development would take place here.

13.19.13. Cumulative Impacts with other development in the area are considered under Section 9.5.5 and it is considered that no significant adverse impacts are likely. Indirect impacts on designated sites are considered to be unlikely.

13.19.14. A range of mitigation measures are provided under Section 9.6 of the EIAR and include the construction and operational phases of the development. Full

consideration is given to designated sites, Habitats & Flora and Fauna. Monitoring details are provided under Section 9.7 of the EIAR. Residual impacts include benefits from the proposed landscaping of the site and the provision of pollinator friendly planting.

13.19.15. **Submissions and Observations:** The Planning Authority did not raise any issues of concern in the CE Report. Concern was expressed in a number of the observations about the impact on biodiversity especially through the loss of trees and habitats. Potential exists for surface-water run-off to impact on the designated sites to the south of the site.

13.19.16. **Assessment:** The submitted details in the EIAR provide a detailed assessment of the current situation in relation to Biodiversity and the potential impact on it through the construction and operational phases of the development. I note that the species found on site are generally common in the area and nationally and whilst some may be listed as of concern at an EU level, they are not rare or under threat at an Irish level. The applicant has proposed a detailed range of mitigation measures, and these are considered to be acceptable. Site clearance works would be restricted to the requirements of other non-planning legislation.

13.19.17. I am satisfied that the identified impacts would be avoided, managed, and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts on Biodiversity.

## 13.20. Noise & Vibration

13.20.1. There is no published Irish guidance on maximum permissible noise levels during the construction phase of a development and limits are applied through hours of operation and noise levels imposed by local authorities at their discretion. This Section of the EIAR makes reference to BS 5228-1: 2009+A1:2014: Code of Practice for Noise and Vibration on Construction and Open Sites – Noise. Noise thresholds are got from this document and are summarised in Table 10.1 of the EIAR. Vibration details are obtained from BS 7385 – 2 (BSI 1993) in relation to acceptable vibration that avoids damage to buildings and BS 5228 – 2 (BSI 2014b) also provides information. Recommended construction vibration thresholds for

buildings are provided in Table 10.2 of the EIAR. BS 5228-2 also provides vibration guidance in relation to humans, and this is summarised in Table 10.3 of the EIAR.

13.20.2. Section 10.3.3 provides details of Building Services Plant and Section 10.3.4 provides details on Additional Traffic on Surrounding Roads during the Operational Phase of the development in addition to Section 10.3.5 detailing Deliveries and Waste Collection. As the development is for a residential scheme, vibration will not impact on the environment during the operational phase.

13.20.3. Surveys were undertaken in June 2021 and full details of the survey, equipment, noise parameters and survey results are provided in Sections 10.4.2 to 10.4.5. The development gives rise to two distinct phases – Construction Phase and the Operational Phase. Potential impacts from the Construction Phase are detailed under Section 10.6.1 and Operational Phase impacts under Sections 10.6.2 to 10.6.5. Section 10.7 provides a range of Remedial and Mitigation Measures. Control of noise at source and the Control of the spread of Noise are provided as the main categories for noise control.

13.20.4. Cumulative Impact is considered in relation to an already approved phase of development to the west, this is expected to be temporary to short term, negative and not significant. Interactions are considered under Section 10.9 and Inward Impact, primarily from road traffic, is considered under Section 10.10 of the EIAR. Section 10.10.3 provides a Stage 1 Assessment for Noise Risk.

13.20.5. Overall, once complete, the majority of the site will be at negligible risk. The proposed apartment to the south and two houses to the north may be within a medium risk zone during night time. Section 10.9.4 provides a Stage 2 Assessment and suitable responses will be made to the design and layout of the site.

13.20.6. **Submissions and Observations:** Concern was expressed in the third-party observations about the impact of the construction phase of the proposed development and also of increased traffic during the construction and operational phases.

13.20.7. No particular issues of concern were raised by the Planning Authority through the submitted CE report.

13.20.8. **Assessment:** The submitted details do not give rise to any issues of concern. It is accepted that noise and vibrations will increase from the current level

during the construction phase, but suitable mitigation measures have been identified that should ensure that the impacts are not significant. I note the presence of busy roads in the area, and the railway line, all of which provide for a level of noise and vibration.

13.20.9. I am satisfied that the identified impacts would be avoided, managed, and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Noise & Vibration.

### **13.21. Cultural Heritage**

13.21.1. This chapter was prepared by John Cronin & Associates. A detailed desktop survey was undertaken, and an extensive range of resources were available for consideration. A site inspection was undertaken in addition to the desktop survey. Full details of Impact Assessment in relation to Cultural Heritage are provided under Section 11.2.3 of the EIAR. Table 11.1 summarises the potential 'Magnitudes of Effect on Cultural Assets' – magnitude ranges from High to Negligible and Table 11.2 provides 'Indicative factors for assessing the Value of Cultural Heritage Assets'.

13.21.2. The existing environment is described under section 11.3 and includes a detailed summary of relevant legislation in relation to cultural heritage. Section 11.3.3.1 provides for a thorough summary of the Archaeological and Historical Context of the area. Table 11.5 provides a list of recorded archaeological sites in the area, four in total and all of which are at least 600 m away from the site. Table 11.6 provides a list of 'Designated architectural heritage structures within 1km study area', a total of 10 such structures are identified, and none are on the site. Anne Mount House is 140 m to the south west and Ashbourne House is 220 m to the east; both are listed on the Record of Protected Structures. A review of Cartographic Sources and a Review of Aerial/ Satellite Images is also undertaken. A range of undesignated cultural heritage assets are provided and include townland boundaries and placenames (further summarised in Table 11.7).

13.21.3. Section 11.3.4 provides details on Field Surveys undertaken in August and September 2021. In conclusion, there are no recorded archaeological sites



within 600 m of the site boundary and no designated architectural heritage structures within 200 m of the site boundary. Structures located to the southern part of the site are not of importance.

13.21.4. The Construction Phase will not impact on any Cultural Heritage in the area other than part of the former gardens of Ashbourne House, which have been in separate ownership for over 50 years and are not considered to be within the curtilage of this house. The Operational Phase will not adversely affect any cultural heritage in the area. Suitable mitigation measures are provided under Section 11.5 of the EIAR. Residual Impacts are not likely to arise.

13.21.5. **Submissions and Observations:** Concern was expressed in a number of the observations about the impact on the former gardens associated with Ashbourne House. These were of great importance when they were fully maintained.

13.21.6. Included with the CE Report is a report from the Cork County Council Conservation Officer. The Conservation Officer does not support the proposed development in the form that it is submitted as it would negatively impact on the garden and the trees of Ashbourne House, thereby having a negative impact on the protected structure.

13.21.7. **Assessment:** I note the submitted details and I also note the details provided in the CE report. The proposed development will not impact on any known archaeology in the area and in addition I do not foresee that the development will impact on any protected structures in the immediate area other than Ashbourne House. The loss of trees associated with the gardens of Ashbourne House will impact on its setting and architectural value.

13.21.8. I note the comments made by the Cork County Conservation Officer in relation to the impact on the gardens of Ashbourne House. There is little doubt that the nature of the proposed development is such that this area of land will be adversely impacted by the proposed development. From the site visit, very little of these former gardens remain, however the importance of trees on site has been identified and the proposed development includes the removal of trees with their replacement elsewhere. From the available information the replacement of such trees does not provide for suitable mitigation.

13.21.9. I am not satisfied that the identified impacts would be avoided, managed, and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. In particular the loss of trees that form part of the former gardens of Ashbourne House, listed on the record of protected structures (RPS no. 00498) and I am not therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Cultural Heritage.

### **13.22. Air Quality & Climate**

13.22.1. This chapter was prepared by AWN Consulting. Relevant legislation and guidance are provided in Section 12.1.2 of the EIAR. Details of Construction Phase Methodology for Air Quality and Climate are provided in Section 12.1.3 and Section 12.1.4 addresses the same for Operational Phase Methodology.

13.22.2. The existing environment is described under Section 12.2 of the EIAR. Meteorological Data is aided from information provided at the Cork Airport weather station, approximately 12 m to the south west of the subject site. Other data considered is Climate, Construction Dust and Air Quality.

13.22.3. The Likely Significant Effects are detailed under Section 12.4 of the EIAR and consider the impacts during the Construction and Operational phases of the development. Air Quality may be impacted by dust from demolition, earthworks, construction and movement of heavy vehicles (Trackout). Greenhouse gases may be released during the construction phase, but the impact would be neutral, localised, imperceptible and short term. Suitable mitigation measures will be provided to ensure that impacts on human health are low risk.

13.22.4. Impacts during the operational phase will be less than during the construction phase. The operational phase is likely to see an increase in traffic movements, but this will be insignificant in terms of Ireland's obligations under the EU 2030 Target.

13.22.5. Air Quality impacts on the designated sites are negative, long-term and imperceptible. Further details are provided in Tables 12.16 and 12.17 of the EIAR.

13.22.6. Cumulative Impacts are summarised in Table 12.18 and a Worst-Case Scenario is considered under Section 12.4.4.

13.22.7. Proposed Mitigation Measure and Monitoring are provided under Section 12.5. Many of the construction phase measures would be incorporated into a Construction Environmental Management Plan (CEMP) for the overall site. No particular mitigation and monitoring measures are required at the operational stage due to the nature of the development, a residential scheme. Any cumulative impacts with other development in the area are likely to be imperceptible, negative, and long-term on both climate and the local air quality. Interactions are considered under Section 12.7, and these are limited.

13.22.8. **Submissions and Observations:** Concern was expressed in the observations about the impact from noise, and dust in addition to traffic due to the proposed development.

13.22.9. **Assessment:** The submitted details and the comments raised in the observations are noted. The proposed development will significantly change this mostly greenfield site into a suburban residential development and in doing so there will be significant engineering and construction works undertaken. These works are likely to give rise to noise and dust. However, these are standard in the case of any construction project and suitable mitigation measures can be provided that ensure that the impacts on the surrounding area can be reduced to an imperceptible level. I do not foresee any impact on the climate from the proposed development.

13.22.10. I am satisfied that the identified impacts would be avoided, managed, and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Air Quality & Climate.

### 13.23. Population and Human Health

13.23.1. This chapter was prepared by HW Planning and the description of the existing baseline environment is provided under section 13.2. This includes population details (using Census 2016 data), household information, travel patterns, affluence and deprivation information and employment statistics. Land use is described under section 13.2.3 and community & Social infrastructure under section 13.2.4. The area benefits from a number of sport and recreational clubs and it is recognised that Part 8 approval has been given for a greenway from Bury's Bridge to

Carrigtwohill benefitting Glounthaune. Childcare and school details are provided under sections 13.2.4.2 and 13.2.4.3. Section 13.2.4.4 details the Community Facilities & Emergency Services that serve the area. Retail provision is provided under section 13.2.4.5 and healthcare in the following section. Public transport is in the form of the railway at Glounthaune, and four bus routes are listed, though these provide a limited service to Glounthaune. Each of the listed sections above are supported with maps indicating the location of the relevant services/ facilities.

13.23.2. The Impact Assessment is under Section 13.3. The construction phase will last about 48 months and suitable mitigation measures will be employed throughout this stage of the development. The operational phase impacts will be permanent and non-reversible. Benefits to the population include additional housing with a choice of unit types, the creation of a compact settlement supporting the local economy, proposed cycle/ footpath will result in a more permeable and sustainable settlement for all. The development will provide for increase open space/ amenity areas, the creche can serve the wider area and the proposed community and commercial units will add to the range of facilities available in the area. The development is considered in the context of the other section of the EIAR. No significant adverse impacts are foreseen.

13.23.3. The following section of the EIAR consider the impact of the development, at both construction and operational phases, on the Local Economy, on Amenity, Open Space and Sports, on Childcare and Education on Community Facilities, on Retail Services, on Emergency Services, and on Public Transport. Impacts are likely to be positive in most cases through increased use of these services, though there is likely to be an increased demand on school places in the area which may put pressure on school capacity.

13.23.4. A full list of Mitigation Measures, Monitoring and Residual Impacts is provided under Section 13.4. Cumulative Impacts are considered under Section 13.5 and no issues of concern are identified.

13.23.5. **Submissions and Observations:** Concern was raised about the impact on school places in the area and the fact that Glounthaune does not have a secondary level school. The local area does not provide adequate services and

facilities for a development of just under 300 residential units. The Planning Authority did not raise any issues of specific concern.

13.23.6. **Assessment:** I note again the comments made in the observations and the detail provided in the EIAR. I agree with the information provided in the EIAR that the development is likely to have a positive impact on Population. Additional residents in the area will benefit the local retail and transport provision. The availability of additional houses will meet some of the housing demand in this part of East Cork.

13.23.7. I am satisfied that the identified impacts would be avoided, managed, and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have any unacceptable direct or indirect impacts in terms of Population.

#### 13.24. Interaction of Impacts

13.24.1. This Chapter 14 has been prepared by HW Planning and provides for a description of interaction of impacts. Table 14.1 provides for a clear summary of these interactions and in some cases, there are no such interactions.

13.24.2. I am satisfied that the submitted interaction of impacts has been thoroughly considered and that all issues have been addressed in an acceptable manner.

#### 13.25. Summary of Mitigation Measures

13.25.1. Chapter 15 provides a summary of the various Mitigation Measures to be used in this development. These have already been detailed under the various chapter headings of the EIAR and are considered to be acceptable.

#### 13.26. Appendices:

13.26.1. The EIAR includes three volumes of Appendices in support.

- Part 1 provides information in support of Chapters 1, 2, 3 & 4,
- Part 2 provides information in support of Chapters 5 & 6 – Mostly Chapter 5  
Traffic and Transportation

- Part 3 provides information in support of Chapters 7, 8, 9, 11, 12 and 13.

13.26.2. The EIAR is also accompanied by a Non-Technical Summary (NTS) as is required.

### **13.27. Reasoned Conclusion on Significant Effects**

13.27.1. The Board considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, provided information which is reasonable and sufficient to allow the Board to reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account current knowledge and methods of assessment.

13.27.2. The Board is satisfied that the information contained in the Environmental Impact Assessment Report is up to date and complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU. Having regard to the examination of environmental information contained above, and in particular to the EIAR and supplementary information provided by the developer, and the submissions from the Planning Authority, prescribed bodies and observers in the course of the application, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

- **Landscape & Visual Impact:** The development will present as a new development in the landscape. There will also be changed views for some viewers in nearby residences and nearby locations. A significant alteration in landscape character will occur at the site. The potential impact will be mitigated by the establishment of suitable boundary treatment to reduce the impact at a local level and to provide for extensive landscaping of the site to reduce the visual impact at a more distant level.

It is considered that the impact on the area will be adverse, and the loss of trees and vegetation would be significant and cannot be suitably mitigated against. The submitted photomontages are not comprehensive enough to demonstrate the potential impact of the development on the adjoining area.

- **Material Assets – Traffic & Transport:** Impacts to be mitigated by implementation of a Construction Environmental Management Plan and the promotion of sustainable travel patterns by residents during the operation phase.

The development provides for extensive measures to encourage the use of sustainable forms of transport; however, the topography does not allow for such measures on a regular basis and the car will become the predominant form of transport for short and longer distance journeys. This in turn will result in increased traffic on the adjoining road network which as reported by the Planning Authority through the CE report, is substandard.

- **Material Assets – Services, Infrastructure & Utilities:** Impacts will be mitigated by consultation with relevant service providers; adherence to relevant codes of practice and guidelines; service disruptions kept to a minimum
- **Land & Soils:** The impacts to be mitigated by construction management measures including minimal removal of soil, reuse of excess material within the site; proposals for identification and removal of any possible contamination; management and maintenance of plant and machinery.
- **Hydrology and Hydrogeology:** The impacts to be mitigated by management of surface water run-off during construction; adherence to Construction Management Plan; to avoid uncontrolled discharge of sediment. Operational impacts are to be mitigated by surface water attenuation to prevent flooding.
- **Biodiversity:** Impacts to be mitigated by the proposed landscaping strategy; ensure no additional invasive species are introduced; the significant provision of active and passive open space; protection of trees to be retained, and measures to avoid disturbance to bats and nesting birds.
- **Noise & Vibration:** Impacts will be mitigated by adherence to requirements of relevant code of practice; location of noisy plant away from noise sensitive locations and through the use of suitable noise control techniques on site.
- **Cultural Heritage:** The proposed development would adversely impact on part of the former gardens of Ashbourne House. The need for extensive engineering features will cut through this former garden and result in the loss of important Champion and Heritage Trees. The loss of so many mature/ significant trees would have a negative impact on the established visual amenity of the area.

- Air Quality & Climate: The impacts will be mitigated by suitable measures taken on site during the construction phase of development. These will be detailed in a Construction Environment Management Plan (CEMP).
- Population and Human Health: Impacts are likely to be positive with the provision of additional housing and an increased local population that will avail of services/ facilities in the area.

The submitted EIAR has been considered with regard to the guidance provided in the EPA documents 'Guidelines for Planning Authorities and An Bord Pleanála on Carrying out Environmental Impact Assessment' (2018); 'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports' (draft August 2017) and 'Advice Notes for Preparing Environmental Impact Statements' (draft September 2015).

The following environmental/ material assets have been detailed in the EIAR, however suitable mitigation measures are not provided/ do not demonstrate that they are sufficient to address issues of concern:

- Landscape & Visual Impact – Loss of trees and significant change in the landscape when viewed from outside the site.
- Material Assets – Traffic & Transport – The development will be car orientated and dependent. This will put pressure on the adjoining road network which is considered to be substandard.
- Cultural Heritage – The loss of trees and negative impact on the character of the former Ashbourne House gardens. This in turn would have a negative impact on the visual amenity of the adjoining area.

In conclusion, it has not been sufficiently demonstrated that the development would not adversely impact on landscape & visual amenity, traffic & transport and cultural heritage and a refusal of permission will be recommended.



## 14.0 Recommendation

Section 9(4) of the Act provides that the Board may decide to:

- (a) grant permission for the proposed development.
  - (b) grant permission for the proposed development subject to such modifications to the proposed development as it specifies in its decision,
  - (c) grant permission, in part only, for the proposed development, with or without any other modifications as it may specify in its decision, or
  - (d) refuse to grant permission for the proposed development,
- and may attach to a permission under paragraph (a), (b) or (c) such conditions it considers appropriate.

14.1. In conclusion, I consider the principle of development, as proposed, to be unacceptable on this site and that permission should be refused. The site is located within the development boundary of Glounthaune, is suitably zoned to allow for residential development and is located on a serviced site/ where services can be provided. The points issues of concern have been identified:

- The local road network is inadequate to accommodate the scale of development proposed, the topography of the site is such that this will be a car dominated development as walking/ cycling would be difficult through the slope of the site. The increase in car usage would give rise to traffic congestion on the local road network which in turn would give rise to traffic hazards.
- The proposed development which includes the removal of trees on the former garden associated with Ashbourne House, which is listed on the Cork County record of protected structures, would adversely affect the character of this site.
- The proposed development of a significant number of residential units would require the removal of a large number of trees, would require significant engineering works and would have an adverse impact on the visual and established character of the area.

The proposed development would therefore be contrary to National Guidance and Local Policy and would not be in accordance with the proper planning and sustainable development of the area.

14.2. Having regard to the above assessment, I recommend that section 9(4)(d) of the Act of 2016 be applied, and that permission be REFUSED for the development, for the reasons and considerations set out below.

## 15.0 Recommended Draft Order

**Application:** for permission under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016, in accordance with plans and particulars, lodged with An Bord Pleanála on the 16<sup>th</sup> of December 2021 by Bluescape Limited.

### **Proposed Development:**

- The demolition of an existing detached house.
- The provision of 289 residential units comprising of 88 duplex/ apartment units and 201 houses.
- A creche with capacity for 67 children and associated play area.
- A community unit with an internal area of 102.1 sq m.
- A commercial unit with an internal area of 69.2 sq m.
- A Multi-Use Games Area (MUGA).
- Vehicular access to be provided from 'The Terrace' and emergency access is from a local road (L-2969) to the north of the site, and a right of way from the west of the site over a road (L-2968) permitted under PA Ref. 17/5699/ ABP Ref. 300128-17.
- All associated site works, infrastructure provision and the provision of suitable amenity lands.

The application contains a statement setting out how the proposal will be consistent with the objectives of the Cork County Development Plan 2014 – 2020 and the Cobh Municipal District Local Area Plan 2017. It is submitted that the proposed

apartments/ duplex units have been designed to fully accord with the Sustainable Urban Housing: Design Standards for New Apartments 2020. A full Housing Quality Assessment is submitted which provides details on compliance with all relevant standards including private open space, room sizes and storage areas.

The proposed development is accompanied with a Material Contravention Statement which sets out justification for the proposed development.

Three issues were raised:

- Excessive Density of Development
- Car parking provision
- Excessive number of units proposed

The listed issues were considered to not result in a material contravention of the Cork County Development Plan 2014 – 2020.

#### **Decision:**

Refuse permission for the above proposed development based on the reasons and considerations set out below.

#### **Matters Considered:**

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.

### **16.0 Reasons and Considerations**

The Board Considers that:

1. Having regard to its location at the eastern side of Glounthaune, it is considered that the proposed development would be out of character with the pattern of development in the area and would result in:

- a proposed site layout that is dominated by roads and with an inadequate provision for cyclists and pedestrians primarily through the steep sloping nature of this site,
- the poor disposition and quantity of public and private/ communal open space which is restricted by the sloping nature of the site,
- the loss of locally important trees, the provision of a large area of residential units on a sloping site, the need for heavy engineering features to accommodate the development, would all substantially change the views of the site and have an adverse impact on the character of the area which is designated as having a High Landscape Value.

The proposed development would thereby constitute a substandard form of development which would seriously injure the amenities of the area and be contrary to the proper planning and sustainable development of the area.

2. Due to the topography of the site, and in particular the steeply sloping nature of the site, it is considered that the provision of suitable and useable pedestrian/ cyclist facilities cannot be achieved to an acceptable level. Consequently, the proposed development would be dominated by car use for most journeys, including local trips to Glounthaune village, schools, and the railway station. The development would therefore generate a significant volume of traffic which the road network in the vicinity of the site is not capable of accommodating safely due to the restricted width and capacity of the L-2968 Local Road in the vicinity of the site and the restricted capacity of its junction at the 'Dry Bridge' with the L-2970 Local Road. The proposed development would, therefore, give rise to traffic congestion and would endanger public safety by reason of traffic hazard.

3. The local road network cannot currently provide for suitable pedestrian and cyclist facilities to serve the increased demand generated by this development. Future residents would be forced to walk/ cycle along the substandard road network, which would lead to conflict between road users, that is, vehicular traffic, pedestrians, and cyclists. The proposed development would, therefore, endanger public safety by reason of traffic hazard.

4. Ashbourne House, which is listed on the Cork County Record of Protected Structures (RPS no. 00498), is located to the south east of the site, south of The Terrace, L-2970, Local Road. The associated gardens and woodland of Ashbourne House extend to include part of the subject site. A number of the trees located within the woodlands are of a high cultural and visual value. The proposed development includes the removal of a significant number of these trees, and this would negatively impact on the visual amenity and the cultural heritage value of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

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Paul O'Brien

Planning Inspector

8<sup>th</sup> April 2022