

Strategic Housing Unit,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.
D01 V902

2nd May 2019

**Re: Strategic Housing Development Pre-Application Consultation Ref. ABP-302564-18
Application for planning permission for the construction of 472 no. residential units, creche,
and all associated ancillary development works at Castletreasure/Maryborough (townlands),
Carr's Hill/Carrigaline Road (R609), Douglas, Co. Cork.**

Dear Sir / Madam,

We act on behalf of the applicant Cairn Homes Properties Ltd. and wish to submit the enclosed Strategic Housing Development (SHD) planning application for the above-referenced development to An Bord Pleanála under the provisions of the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made following Pre-Application Consultation and the receipt of a Notice of Pre-Application Consultation Opinion issued by An Bord Pleanála dated 12th November 2018 under ABP-302564-18.

A schedule of attachments of the documentation and information provided in support of this application is attached at Appendix 1 and 2 no. hard copies and 3 no. electronic copies of this documentation is enclosed. The additional information sought in the Board's Notice of Pre-Application Consultation is addressed below.

In the Board's Notice of Pre-Application Consultation Opinion, a number of issues were specifically identified relating to Green Infrastructure, Density and Layout, Movement/Transport, Surface Water Management which were to be addressed at application stage. The following provides an overview of these items and how/where these have been addressed in the submitted planning application material:

1. Green Infrastructure

Item 1 of Pre-Application Consultation Opinion states that:

“Further consideration and/or justification of the documents as they relate to the consideration of Green Infrastructure and the specific objective SE-R-06 which seeks the retention of all existing trees and hedgerows within the overall development of the site and the Tree Protection Order pertaining to trees along the western boundary.

Further consideration should also be given to the proposed landscaping plan and the hierarchy, function and usability of public open spaces including the use/linking of green corridors throughout the scheme. All proposed SUDs features should be clearly identified on a site layout plan with proposals as to how the features will enhance/contribute to a sense of place. Computer Generated Images and long cross-sections should be submitted

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to show changes in levels and inter alia, the interface of boundary treatments and SUDs to public open spaces/streetscape.

Consideration should also be given to the existing biodiversity value of the site and retention of movement corridors through the proposed scheme for wildlife and any potential impact on same arising from proposed lighting scheme. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”

In response to item 1 of the Board’s Pre-Application Consultation Opinion and as part of the SHD application submission, AECOM have prepared a comprehensive set of drawings and ‘Green Infrastructure Landscape Strategy’ which includes the following:

- The retention and incorporation of a significant majority of existing trees and hedgerows within the overall development of the site – refer to Figure 6c of AECOM’s Green Infrastructure Landscape Strategy;
- The retention and protection of all trees within the Tree Protection Order along the western boundary – refer to Figure 4b ‘Tree Protection Order and Root Protection Zones’ of AECOM’s Green Infrastructure Landscape Strategy;
- Detailed Landscaping Plan – drawing ref. SHT-20-0000-L-1000;
- The hierarchy, function and usability of public open spaces including the use/linking of green corridors throughout the scheme is also detailed in AECOM’s Green Infrastructure Landscape Strategy, including in particular Figure 6b ‘Open Space Hierarchy’, Figure 6a ‘Landscape Structure’ which quantifies the area of usable (8.2Ha) and passive (2.2Ha) open space areas.

Details of SUDs are included in the Engineering Report/Drawings by JB Barry and Chapter 7 of the EIAR and include permeable paving overlying a porous aggregate reservoir, which has been sized to ensure the runoff from these parking areas drains via the porous aggregate and not directly over the surface to the sealed surface water sewer pipework. Long and detailed cross-sections are included in AECOM’s Strategy document (see pages 21 to 26) showing changes in levels and the interface of boundary treatments and SUDs to public open spaces/streetscape.

A comprehensive set of Computer-Generated Images (CGI’s) and Photomontages have been included in MDP’s Design Statement and AECOM’s Green Infrastructure Landscape Strategy and Landscape and Visual Assessment, to demonstrate how existing and proposed features (such as SUDS, level changes, retaining structures, landscaping etc) will enhance/contribute to a sense of place.

AECOM and Kelleher Ecology worked closely together and gave very careful consideration to the existing biodiversity value of the site and as far as practicable, to the retention of movement corridors through the proposed scheme for wildlife.

O’Connor Sutton Cronin and Kelleher Ecology have also worked closely together to minimise the potential impact of the proposed lighting scheme on bats and other fauna, and areas of the site that are considered sensitive to artificial lighting have been taken into account by the proposed public lighting design for the residential scheme by O’Connor Sutton Cronin (refer to Public Lighting Report, C874-OCSC-XX-XX-RP-E-0001-S8-P01) - all lighting systems will be designed to minimise light spillage nuisance by using shielded, downward directed lighting wherever possible and switching off all non-essential lighting during the hours of darkness and by not using floodlighting during the construction phase.

Overall, it is considered that the drawings and material as they relate to Green Infrastructure and existing natural features of the site, have formed a fundamental component of the proposed scheme and demonstrate

compliance with the requirements of specific objective SE-R-06 and respect the Tree Protection Order pertaining to trees along the western boundary.

2. Movement and Transportation

Item 2 of Pre-Application Consultation Opinion states that:

“Further consideration and/or justification of the documents as they relate to vehicular, cycle and pedestrian connections including legibility and permeability through the development site to contiguous residential lands, the school site and the provision of possible future connections to lands to the south from the development site.

Further consideration should be given to how the proposed street hierarchy and access arrangements from the Carrigaline Road are consistent with the principles of the Design Manual for Urban Roads and Streets. Consideration should also be given to public transport routes proposed to serve the development lands. Further consideration of this issue may require an amendment to the documents and/or design proposal submitted.”

In response to item 2 of the Board's Opinion, the Site Layout drawings and Design Statement by MDP Architects and the Green Infrastructure Landscape Strategy prepared by AECOM, pay particular attention to vehicular, cycle and pedestrian connectivity, legibility and permeability through the development to contiguous residential lands, the school site and the provision of possible future connections to lands to the south from the development site.

The Site Layout Plans and Section 4 of the Design Statement by MDP Architects illustrate the overall movement and transportation hierarchy for the proposed scheme, including connectivity (p.30), legibility through distinct neighbourhoods and character areas (p.44), street hierarchy and access arrangements (p.42) and compliance with the principles of the Design Manual for Urban Roads and Streets (DMURS – p.42) which have been incorporated in the design of the development roads, to improve legibility through the scheme.

In relation to the provision of possible future connections to lands to the south which have been identified as a 'Strategic Land Reserve' in the 2017 Ballincollig-Carrigaline Local Area Plan, as can be seen from the Site Layout by MDP Architects, 2 no. direct access points have been included to allow for possible future connections to lands to the south, with further potential connection points possible/available which could also be considered.

In relation to the to the R609 Carr's Hill/Carrigaline Road, particular attention has been paid to this part of the proposed development to ensure that this section of road is consistent with the principles of the Design Manual for Urban Roads and Streets and provides an attractive urban environment for this approach to Douglas. Accordingly, important design changes have been made to this part of the proposed scheme following the Pre-Application Consultation with the Board, most notably with the introduction of 3 no. Apartment Blocks (B, C and D) which directly address the street/R609. On street parking, a new public footpath and a large landscaped area provide an interface between the road and the apartment blocks (refer to p.50 of the Design Statement by MDP Architects) and traffic calming measures in the form of a 'Gateway' treatment is included as part of the drawings by JB Barry.

Careful consideration has also been given to public transport routes proposed to serve the development lands. Chapter 5A of the EIAR includes details of Existing Public Transport and Pedestrian/Cycle Facilities, including details of five Bus Eireann services linking the wider Douglas area to Cork City and surrounding area. Currently, only one bus route (Route 216) directly serves the proposed site. The permitted Primary School permitted

(Cork County Council planning application ref. 18/5369 / An Bord Pleanála ref. ABP-302924-18), which is located on land within the ownership of the applicant, includes provision for a bus stop at the main entrance to the site– this bus stop has also been reflected in the Strategic Housing Development layout submitted by our client, and will afford an opportunity to facilitate improvements to the local bus service to improve connectivity and capacity between the proposed site and surrounding areas/city centre.

Cork County Council have progressed a Part 8 application for the Ballybrack Greenway which is an extension of the existing Douglas/Ballybrack Greenway located to the west of the site. A section of the Greenway extension is included as part of our clients' development, within the large linear amenity space which runs roughly east-west through the site and is linked to the neighbourhood areas via a series of pedestrian paths. The proposed pedestrian/cycle network increase connectivity through the site while also encouraging more activity and more social interaction between residents.

3. Urban Design Response, Density and Layout

Item 3 of Pre-Application Consultation Opinion states that:

“Further consideration and/or justification of the documents as they relate to the rationale of the proposed residential layout and urban design response with particular regard to the creation of distinct neighbourhood areas within the overall site, the creation of active and aesthetically pleasing urban street frontages having particular regard to the site context and significant difference in levels across the site, and how the proposed elevational treatments respond to the site context to ensure a qualitative design response with optimal passive surveillance of public and private open spaces throughout the scheme.

In addition, further consideration should also be given to the proposed density having regard to the provisions of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009.

Further elaboration including illustrations of how the site analysis/context informed the proposed layout and urban design response would be useful. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”

In response to Item 3 of the Board's Opinion, the Design Statement by MDP Architects outlines in some detail (including extensive illustrations), how the site analysis/context informed the proposed layout and urban design process. The Design Statement was prepared having particular regard to the 12 no. design criteria set out in the *Urban Design Manual – A Best Practice Guide* (UDM) issued by the Department of Environment, Heritage and Local Government: Urban Design Manual 2009, including Context, Distinctiveness, Layout, Public Realm and Detailed Design – compliance with all 12 criteria is included in Section 4.0 of MDP's Design Statement and Table 2.2 of the Statement of Consistency by MHP.

As outlined in Section 3.0 of the Design Statement by MDP, there are 6 no. distinct neighbourhoods/character areas all with their own distinct character and amenities. Active and aesthetically attractive urban street frontages have been provided across the site, with particular house types (e.g. apartments, duplexes and conventional housing) being provided having particular regard to the site context and levels experienced across the site, and to ensure a qualitative design response with optimal passive surveillance of public and private open spaces throughout the scheme.

In relation to density, the scheme has been guided by the 2014 County Development Plan (CDP), the 2017 Local Area Plan (LAP) for the Ballincollig-Carrigaline Municipal District and in particular the 2009 *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)*. Objective HOU 4-1 of the CDP requires a density of between 20 and 50 units per hectare for Medium A Density development. Based on Section 5.11 of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, the site is categorised as an 'Outer Suburban / Greenfield Site' which is defined as follows:

“open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities.”

The Guidelines go on to state that *“the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.”*

Following the Pre-Application Consultation with the Board, the proposed scheme was revised so that it now achieves a net density of 35.52 units per hectare. This is within the range outlined for Medium A density development (and also the range for high density development) in the CDP and it is also consistent with the 2009 *Guidelines on Sustainable Residential Development in Urban Areas* for 'Outer Suburban / 'Greenfield' sites' in that it is above the density range of 35-50 dwellings per hectare cited in the guidelines. This is an increase from 32.67 units per hectare which was previously proposed at pre-application stage. This increase in density has mainly been achieved by the provision of apartments on to Carr's Hill/Carrigaline Road (in lieu of duplexes) and through the introduction of duplex/apartments to the west of the creche (in lieu of detached dwellings).

Overall, we consider that the net density of 35.52 units per hectare, is the optimum achievable for the site and that the density and layout responds to the need to integrate the development with its surroundings while also considering the sites potential, constraints, topography and environmental context.

4. Surface Water Management and Risk of Flooding

Item 4 of Pre-Application Consultation Opinion states that:

“Further consideration of documents as they relate to surface and storm water management for the development lands and the risk for displaced or increased discharge of waters downstream towards Douglas Village. This further consideration should have regard to the requirements of the Council in respect of surface water treatment and disposal and SUDS measures proposed for the scheme. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management Guidelines' (including the associated 'Technical Appendices'). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.”

The surface and storm water strategy for the development is outlined in Chapter 7 of the EIAR, Flood Risk Assessment and Engineering Report/Drawings by JB Barry Consulting Engineers. The surface and storm

water strategy for the development incorporates SUDS (Sustainable Urban Drainage Systems) features to reduce run-off and provide environmental/biodiversity benefits. Parking surfaces comprise permeable paving overlying a porous aggregate reservoir, which has been sized to ensure the runoff from these parking areas drains via the porous aggregate and not directly over the surface to the sealed surface water sewer pipework, thereby providing an additional element of source attenuation. Other SUDS measures such as filter drains behind retaining structures are also incorporated into the surface water drainage system (refer to JB Barry Report/Drawings for further details).

Notwithstanding the inclusion of SUDS provisions, the development will also include the construction of a gravity surface water drainage network throughout the site, which will include the installation of dedicated attenuation facilities upstream of proposed outfalls to the Moneygurney and Douglas Streams, to attenuate discharges to the undeveloped 'greenfield' runoff rates with the operation of proprietary hydro-brake flow-control devices.

In relation to flood risk, as can be seen from Chapter 7 of the EIAR, the national flooding website www.floodmaps.ie does not have any record of historic flooding at the site. The proposed development is located within the South Western River Basin District (RBD) of Ireland and the OPW is working in partnership with consultants, Local Authorities and other stakeholders to deliver Catchment Flood Risk Assessment and Management (CFRAM) study for the RBD. In the meantime, the OPW has published the Preliminary Flood Risk Assessment (PFRA) maps, in the form of 420 maps covering the country. According to the explanatory leaflet published for public consultation at PFRA stage, the PFRA is only a preliminary assessment, based on available or readily derivable information. It also states that areas where an on-site inspection is required to investigate the issues more closely, then those inspections will be carried out as part of the CFRAM Studies.

The PFRA map is shown in Figure 7.2 of the EIAR and indicates that no groundwater flood risk or pluvial flood risk exists near the proposed development site but that the eastern portion of the site (along the route of the Moneygurney Stream) is located within a fluvial flood risk zone i.e. indicative 1% Annual Exceedance Probability 100-yr event and fluvial extreme events. Accordingly, a 'Flood Risk Assessment', (FRA) has been prepared by J.B Barry & Partners and accompanies the planning application.

No development is proposed within a flood zone, and as outlined in the FRA and EIAR, in order to prevent any increased flooding at the downstream reach of the Ballybrack/Douglas Streams from the proposed development, SUDS and on-site attenuation will be implemented in order to limit the discharge from the site to the current greenfield discharge rates. The implementation of these SUDS/ attenuation measures will mitigate the risk of flooding outside of the development site and ensure there is no downstream impact(s) from the proposed development.

The Board's Notice of Pre-Application Consultation Opinion also required the submission of the following information as part the application for permission:

- 1. Landscaping proposals including an overall landscaping masterplan for the development site and a site layout plan indicating the full extent of tree retention and removal if proposed. Details of proposed tree protection measures during construction. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street***

furniture including public lighting and boundary treatments should be submitted. Sections should be submitted at key locations where the public open spaces interface with proposed residential units.

Landscaping proposals including an overall Landscape Masterplan (Drawing Ref. SHT-20-0000-L-1000) and Green Infrastructure Landscape Strategy has been prepared by AECOM for the site and outlines the full extent of tree retention (including details of proposed tree protection measures during construction) and removal where necessary/proposed – refer to Figure 4b 'Tree Protection Order and Root Protection Zones' in the Green Infrastructure landscape Strategy.

Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including details of play equipment, street furniture including public lighting and boundary treatments are also included within MDP's Design Statement (refer to Section 3: Developed Design) and AECOM's Green Infrastructure Landscape Strategy the Green Infrastructure landscape Strategy (refer to pages 24-25) and Drawing ref. SHT-20-0000-L-1002 (Detailed Area Plans 1 to 3).

Comprehensive Sections are included in both MDP's Design Statement (refer to Section 2: Development Strategy) and drawings including 10 no. detailed Site Sections (i.e. Sections A-A through to M-M) and AECOM's Green Infrastructure Landscape Strategy (pages 21 to 26) showing the interface of boundary treatments and where the public open spaces interface with proposed residential units.

2. A site layout plan which clearly illustrates the overall movement and transportation hierarchy for the proposed scheme. Proposed connections to existing greenways should be clearly indicated with relevant letters of consent from third parties if required.

Please refer to the Site Layout Plans and Section 4 of the Design Statement by MDP Architects which illustrates the overall movement and transportation hierarchy for the proposed scheme, including connectivity (p.30), street hierarchy and access arrangements (p.42) and compliance with the principles of the Design Manual for Urban Roads and Streets (DMURS – p.42) which have been incorporated in the design of the development roads, to improve legibility through the scheme and to define a clear roads hierarchy which includes the main arterial route, link/secondary roads and pedestrian priority areas which includes pedestrian crossings, raised tables and 'homezones' based on the principles set out in DMURS. Most of the streets are looped with no dead-end streets for pedestrians. Homezone streets have tight radii at their entrance points with raised table crossings to indicate to all users the transition into the homezone. Within the homezones, streets and carriageways are narrowed to 5.5m with surface materials to remind drivers that the space is a pedestrian priority area with the focus on free movement for vulnerable users such as cyclists and pedestrians.

Cork County Council have progressed a Part 8 application for the Ballybrack Greenway which is an extension of the existing Douglas/Ballybrack Greenway located to the west of the site. A section of the Greenway extension is included as part of our clients' development, within the large linear amenity space which runs roughly east-west through the site and is linked to the neighbourhood areas via a series of pedestrian paths. The section of greenway over our clients' lands will connect to the existing Ballybrack greenway to the west via the Irish Water pumping station compound (this section is included within the Council's Part 8) and will also connect to the extension of the Ballybrack Greenway to the east included in the Council's Part 8 proposal. No letters of consent from third parties are required to facilitate the section of greenway on our clients' lands. The greenway and connecting pedestrian trails loop through the site

and run alongside areas of the existing streams and woodland. The proposed pedestrian and cycle network increase connectivity through the site while also encouraging more activity and more social interaction between residents.

3. *Photomontages and cross sections at appropriate intervals for the proposed development including how the development will interface with contiguous residential developments, the river valley and the R609 Carrigaline Road.*

The 'Landscape and Visual Assessment' (Chapter 4) and Appendix 4.1 of the EIAR includes a Booklet of Planning Application Photomontages prepared by Innovision Media Ltd., with 12 no. Photomontages showing the existing and proposed views at key representative viewpoints showing how the development will interface with contiguous residential developments (refer to Viewpoints 1, 2 and 9), the river valley (refer to Viewpoints 3 and 4) and the R609 Carrigaline Road (refer to Viewpoints 3, 4, 5 and 12).

CGI's by Innovision and MDP Architects and detailed Cross Sections are included in MDP's Design Statement (refer to Section 2: Development Strategy) and drawings including 10 no. detailed Site Sections (i.e. Sections A-A through to M-M) which also represent the development and how it will interface with contiguous residential developments, the river valley and the R609 Carrigaline Road.

4. *Details of existing and proposed levels across the development site relative to adjoining lands in particular contiguous residential properties. Full details of any 'cut and fill' proposals should be provided.*

Detailed site sections showing the existing (dashed line) and proposed levels across the development site and relative to adjoining lands/contiguous residential properties are included in 10 no. Sections A-A to M-M by MDP Architects.

Full details of cut and fill proposals are included in Chapter 6 of the EIAR including Table 6.1: 'Earthworks Cut/Fill Balance' which provides details of cut and fill for each phase of development. As can be seen from the existing and proposed site sections, the topography of the site will require considerable preparatory earthworks which will extend into the subsoils in order to facilitate the construction of building foundations and retaining structures and to facilitate housing/apartment/roads construction.

Where possible excess soil will be reused on the site for construction of embankments/backfill to retaining structures etc, however, there will be a significant export of residual earthworks material surplus to requirements on site as detailed in Table 6.1 of the EIAR. It is the intention to prevent this surplus material becoming a waste material by planning for this excess soil and stone material to be used elsewhere as a by-product and not discarded as a waste in line with the current EPA public consultation document, 'Regulatory position on soil & stone by-products' published in October 2018. An outline Waste Management Strategy is detailed in Chapter 2 of the EIAR and a final strategy will be agreed with the Planning Authority prior to the commencement of any development.

5. All existing watercourses and utilities that traverse the site including any proposal to culvert/re-route/underground existing drains/utilities should be clearly identified on a site layout plan.

All existing watercourses are included in the site plans and Figure 7.1 of the EIAR. No culverting of the Moneygurney or Douglas Streams is required or proposed. A bridge is required and will be provided over the Moneygurney Stream to provide the main access and egress point for the development (detailed in Chapter 2 of the EIAR). The bridge is required to span and provide 15m clearance either side of the existing 1200mm diameter Irish Water trunk main and will also span a greenway as detailed in planning application drawing 18203-JBB-1A-XX-DR-S-093 by JB Barry Consulting Engineers. The Moneygurney Stream will be between 12m and 16m from the northern bridge foundation and the central concrete pier respectively, as detailed in Figure 3.8 of the EIAR and accompanying planning application drawing 18203-JBB-1A-XX-DR-S-093. A second bridge is also required to provide pedestrian access over the Moneygurney Stream approximately 260m upstream of the main access bridge. This will be a relatively small structure formed of precast concrete beams spanning onto two abutments either side of the stream (see 18203-JBB-1C-XX-DR-C-0139).

All existing and proposed utilities are included in Chapter 7 of the EIAR and the drawings by JB Barry Consulting Engineers. Irish Water have a number of watermains running through the site. A 1200mm

diameter trunk main runs along the eastern side of the site over which there is a 30m wayleave which prevents development along this corridor. It is not proposed to connect to or interfere with this strategically-important trunk main.

There is a 300mm diameter watermain running east to west through the middle section of the site over which there is a 10m wide wayleave. It will be necessary to re-locate this main to suit the proposed arrangement of roads and houses on the site. The route for this re-aligned main will generally be along

new road corridors with connection to the existing main at the eastern and western boundaries of the site. An existing 150mm diameter watermain which traverses the site will also be re-routed. The proposed routes for these mains is shown in Figure 5B.3 (Material Assets Chapter of the EIAR) and on the drawing 18203-JBB-1A-XX-DR-C-0510 by JB Barry Consulting Engineers.

6. Details in respect of the proposed residential units including a schedule of Accommodation and Quality Assessment Report which has specific Planning Requirements set out in the Sustainable Urban Housing: Design Standards for Apartment Guidelines, Guidelines for Planning Authorities as they pertain to the proposed development. A Building Life Cycle Report in respect of the proposed apartments.

Details in respect of the proposed residential units including a schedule of Accommodation and Quality Assessment Report has been prepared by Meitheal Design Partners (MDP) Architects which includes the specific Planning Requirements set out in the Sustainable Urban Housing: Design Standards for Apartment Guidelines, Guidelines for Planning Authorities as they pertain to the proposed development. A Building Life Cycle Report has also been prepared by MDP Architects in respect of the proposed apartments.

7. A report identifying the demand for school and creche places likely to be generated by the proposal and the capacity of existing schools and creches in the vicinity to cater for such demand.

Reports identifying the demand for both school and creche places likely to be generated by the proposed development and the capacity of existing schools and creches in the vicinity to cater for such demand, have been prepared by MHP and accompany the SHD application submission.

The Schools Report identifies eight existing primary schools and two existing post primary schools within a ten-minute drive time of the proposed development site. Out of the eight primary schools the current capacity of 13 spaces is not adequate. However, the capacity does not reflect the amalgamation of St. Columba's NS (girls, including facilities for the deaf) with St. Columba's NS (boys). The new building will be completed for September 2019 and provide a potential capacity for 100 additional children. In addition, the proposed Castletreasure Educate Together Primary School, which was recently granted permission in April 2019 and due for completion in September 2021, would make a further 362 places available, providing ample capacity and reflecting the future growth in the population of Douglas.

The two post primary schools have an available capacity of 105 children with a future capacity of 705 if planning permission for the proposed Educate Together Post Primary is granted by An Bord Pleanála. The grant of planning permission would again adequately cater for the expanding population.

The Childcare Provision Assessment identified a capacity of 74 childcare places or 7% available within a 5km / 12-minute drivetime of the site (this excludes the 24 no. additional childcare facilities located within a 15-20 minute drivetime of the site as well as available capacity in wider areas). Given the existing provision in the area, the proposed development makes provision for a crèche providing 75 no. childcare places, located to the north west of the site. This provision is deemed appropriate given:

- the number of childcare facilities identified in the area;
- the availability of childcare places for the current year 2018/2019; and
- the established demographic trend towards commuting.

Given the existing provision in the area, it is considered that there is enough places available to meet the short to medium term childcare requirements of the area. Notwithstanding this, the creche is proposed to be provided within Phase 1 of the development which will ensure that the creche will be established as development proceeds and the population grows.

8. A construction and demolition waste management plan.

A Construction Environmental Management Plan (CEMP – please note there are no structures requiring demolition on-site) has been prepared and is included in Chapter 2 of the EIAR. An Outline Waste Management Strategy for construction generated waste is detailed in Chapter 2 and a final strategy will be agreed with the Planning Authority prior to the commencement of any development. The CEMP is based on avoiding, reducing or mitigating construction impacts arising from the proposed development and addresses dust control/management, waste management, noise and vibration, traffic management, working hours, pollution control, road cleaning, compound/public health facilities and staff parking, all associated with the construction works.

An updated CEMP will be developed and agreed with the Local Authority prior to the commencement of any development and will take into account any conditions attached to any grant of planning permission from An Bord Pleanála.

9. A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the public open spaces, surface water management proposals having regard to sub-catchments within the scheme and Part V provision.

A phasing plan for the proposed development is shown on drawing 18203-JBB-1B-XX-DR-C-0115 by MDP. The development will be constructed in 4 Phases, over c. 4 years as set out in Table 2.2 and Figure 2.2 of the EIAR. Phases 1 to 4, inclusive, consist of a total of 472 dwelling units. It is estimated that Phase 1 preliminary works (site set up, establishment of compound) will commence in the 4th quarter of 2019 and Phase 4 will be complete and operational by the 4th quarter of 2024. Each phase includes the delivery of the public open spaces, surface water management proposals having regard to sub-catchments within the scheme and an even distribution of Part V Housing which is shown on drawing ref. 18205-PLA-500 by MDP Architects.

10. A site layout plan indicating all areas to be taken in charge.

All areas to be taken in charge is shown on drawing ref. 18205-PLA-017 by MDP Architects.

11. Relevant consents to carry out works on lands that are not included within the red-line boundary. The prospective applicant is advised that all works should as far as possible be included within the red-line boundary.

A letter of consent from Cork County Council is included to carry out road and footpath improvement works on to Carr's Hill/Carrigaline Road (R609). These works are included within the red-line boundary. Details of existing rights/agreements to connect to existing services in the Vicarage/Temple Grove estates are also included as part of the SHD planning application submission. All works proposed are included within the red-line boundary.

Furthermore, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing) Development Regulations 2017 and the Board's Notice of Pre-Application Consultation Opinion, the prospective applicant has notified the following authorities of the making of the SHD application in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Inland Fisheries Ireland
2. Irish Water
3. Transport Infrastructure Ireland
4. Córas Iompair Éireann
5. Minister for Culture, Heritage, and the Gaeltacht
6. Heritage Council
7. An Taisce
8. Cork County Childcare Committee

Note, the applicant has also consulted with the HSE as part of the consultation process for the EIAR and a soft copy of the application has been sent to same.

We trust this SHD application is to the satisfaction of An Bord Pleanála. Please contact the undersigned if you require any further details.

Yours Sincerely,



Tom Halley
McCutcheon Halley

Enc Appendix 1 Schedule of Attachments

Appendix 1: Schedule of Attachments

Please find enclosed 2 no. hard copies and 3 no. electronic copies of the following documentation and information, as required under articles 297 and 298 of the Planning and Development Regulations 2001 to 2017, as amended, and in accordance with the additional information sought in the Board's Notice of Pre-Application Consultation Opinion:

- Cover Letter by McCutcheon Halley Planning (MHP);
- Completed SHD Application Form;
- Press Notice - Template;
- Press Notice – The Echo;
- Site Notice;
- Letter of Consent from Cork County Council (to facilitate road improvement works/infrastructural upgrades);
- Letter from Applicant's Solicitor regarding rights to connect to services within the Vicarage/Templegrove and ownership of part of the greenspace in the Vicarage;
- Copy of Notification Letters sent to Prescribed Bodies and Cork County Council;
- Statement of Consistency by MHP;
- Planning and Design Statement by MHP;
- School Demand Report by MHP;
- Childcare Provision Assessment by MHP;
- Part V Methodology by Cairn and accompanying Part V Site Layout Plan by Meitheal Design Partners (MDP) Architects and e-mail from Cork County Council Housing Officer regarding Part V consultation;
- Schedule of Areas and Accommodation by MDP Architects;
- Schedule of Drawings by MDP Architects;
- Site Location Maps at 1:2,500 (2 sheets) and 1:10,560 prepared by MDP Architects;
- Site Layout Plans at 1:500 in addition to the Site Context Plan at 1:1,000 prepared by MDP Architects;
- Plans, Section and Elevations at various scales by MDP Architects;
- Site Section Drawings at 1:1000 by MDP Architects;
- Plan of areas proposed to be Taken in Charge by MDP Architects;
- Design Statement by MDP Architects including details of proposed house types and Statement of Compliance of Universal Design (Section 6.0);
- Building Lifecycle Report by MDP Architects;
- Quality Assessment Report by MDP Architects;
- Materials and Finishes Report by MDP Architects;
- CGI's by Innovision Media Ltd;
- Energy and Sustainability Report by O'Connor Sutton Cronin;
- Daylight and Sunlight Report by O'Connor Sutton Cronin;
- Landscape Masterplan at 1:500 prepared by AECOM Landscape Architects;
- Landscape Design Statement by AECOM Landscape Architects;
- Landscape Details and Drawings by AECOM Landscape Architects;
- Engineering Drawings and Schedule by JB Barry Consulting Engineers;
- Services Infrastructure Report by JB Barry Consulting Engineers;
- Confirmation of Feasibility and Statement of Design Acceptance from Irish Water;

- A Statement of Compliance with Irish Water's Standard Details and Codes of Practice Design is included in JB Barry's Drawings/Report;
- Flood Risk Assessment by JB Barry Consulting Engineers;
- Phasing Plan by JB Barry Consulting Engineers;
- Road Safety Audit by JB Barry;
- Traffic Modelling Report by JB Barry Consulting Engineers;
- Public Lighting Report & Lighting Layouts by O'Connor Sutton Cronin;
- Environmental Impact Assessment Report by MHP;
- Environmental Impact Assessment Report Appendices by MHP;
- Environmental Impact Assessment Report – Non-Technical Summary by MHP;
- Copy of the Confirmation Notice from Department of Housing, Planning and Local Government regarding the upload of information to the EIA Portal;
- Natura Impact Statement by Kelleher Ecology (see Appendix 7.6 of EIAR);
- CD including Application site boundary (consistent with site location maps and layout) provided as a CAD file (DWG Format) referenced to ITM;
- Cheque for €80,000.00 made payable to An Bord Pleanála.