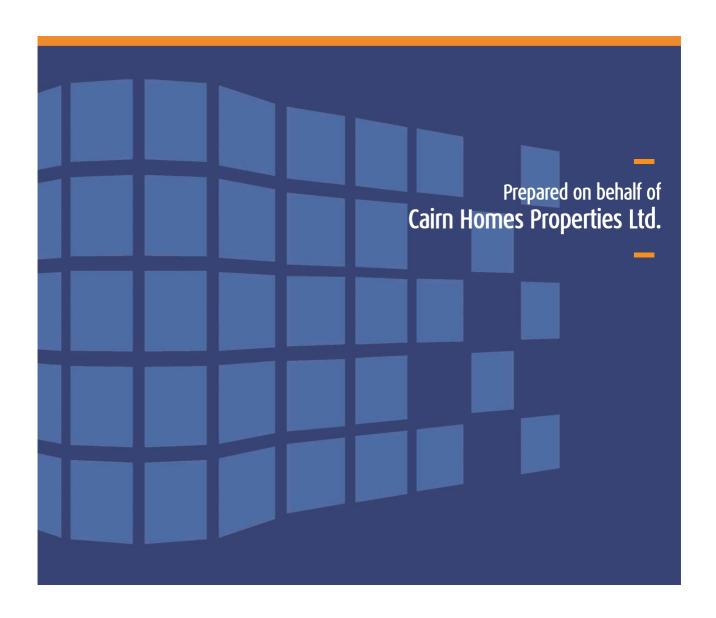


# **Statement of Consistency**

Strategic Housing Development Application for Residential Development comprising 472 no. dwelling units, a creche and all associated development at Castletreasure/Maryborough (townlands), Carr's Hill/Carrigaline Road (R609), Douglas, Co. Cork

April 2019





info@mhplanning.ie

**CORK** 

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#### 1.0 Introduction

This Statement of Consistency (SOC) has been prepared by McCutcheon Halley Chartered Planning Consultants, in collaboration with Meitheal Design Partners, JB Barry Consulting Engineers and AECOM, on behalf of Cairn Homes Properties Ltd. (herein referred to as 'the applicant'). The SOC accompanies a development proposal for residential development at Castletreasure / Maryborough (townlands), Carr's Hill, Douglas, Co. Cork.

This report provides a statement of consistency with the relevant planning policy documents at national and local levels. The statement addresses the relevant policy documents individually, assessing consistency with principles and relevant objectives in a matrix form.

Section 2 of this report addresses the following national planning policy documents:

- 2.1 Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (May 2009), Department of Environment, Heritage and Local Government;
- 2.2 Urban Design Manual A Best Practice Guide (UDM) 2009, Department of Environment, Heritage and Local Government;
- 2.3 Design Manual for Urban Roads and Streets (DMURS) 2013, Department of Transport, Tourism and Sport;
- 2.4 2015 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2015, Department of the Environment, Community and Local Government.
- 2.5 2017 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, Draft Update December 2017, Department of Housing, Planning and Local Government.
- 2.6 The Planning System and Flood Risk Management, Guidelines for Planning Authorities, November 2009, Department of the Environment, Community and Local Government.
- 2.7 Childcare Facilities Guidelines, June 2001.

The site is not in an area of architectural heritage and there are no recorded monuments or protected structures within the boundary of the site. Accordingly, the Architectural Heritage Guidelines, 2011 are not reviewed within the SOC. However, Cultural Heritage has been considered as part of the Environmental Impact Assessment Report (EIAR). Please refer to Chapter 11 of the EIAR for further details.

Section 3 of this report addresses the following Local Planning Policy documents

- 3.1 Cork County Council Development Plan (CDP) 2014
- 3.2 Ballincollig Carrigaline Municipal District Local Area Plan (MD LAP) 2017

#### 1.1 Context

#### 1.1.1 Site Context

The subject site is located within the South Environs, approximately 1.2km south of Douglas Village centre and 3.5km southeast of Cork City Centre. The majority of the site lies within the townland of Castletreasure, with part of the site bounding the R609 located within the townland of Maryborough. The site is greenfield in character, partially overgrown to the north particularly along the river corridor, while there are some open pastoral fields located in the southern portion of the site. The site bounds the Vicarage and Temple Grove Estates, with access currently provided to the lands through these existing residential areas but also proposed from the R609.



FIGURE 1: SITE LOCATION MAP

In terms of topography, the site is challenging and elevated in parts, particularly the southern portion of the site. The slope falls steadily from the south to the edge of the watercourses located along the western boundary (Douglas Stream) and through the east of the site. The eastern stream (Moneygurney Stream) bisects the site, separating the school site and a linear strip of land along the R609 from the rest of the site, forming a valley between the two areas. This valley is heavily planted with trees and shrubs lining the edge of the stream.

There are also 2 no. Irish Water wayleaves which pass through the site – a 30m wide wayleave which connects to the pumping station just northwest of the Vicarage, and a 10m wide wayleave that runs in an east west direction across the site. The site is 21.90 ha in area (gross) with an approximate net developable area of

13.29 ha (i.e. minus areas that are undevelopable including existing Irish Water wayleaves, greenway links, river corridors, protected treelines and steeply sloping areas). To the south of the application site, is a strategic land reserve site (SLR3 Castletreasure). The SLR3 is shown in Figure 2.



FIGURE 2: SITE CONTEXT

#### 1.1.2 Planning History

There have been no relevant planning applications within the subject site. However, applications of note in the surrounding area include Cork County Council Ref. 06/9520 (ABP Ref. 04.221568).

This application by Frinailla Developments Ltd. sought the demolition of existing structures and construction of 77 no. residential units to include 20 no. dwellings and 57 no. apartments in 2 no. apartment blocks ranging in height from 3 to 4 storeys over basement car-parking, upgrading of existing vehicular access and all site development works.

The Planning Authority granted permission for the development, subject to 82 conditions. Condition no. 2 of this permission required the omission of dwellings nos. 18-20, and hence the Manager's Order refers to the development being for 74 residential units, to include 17 dwellings. Most of the conditions are of a detailed engineering nature, particularly by reference to services details. This application was developed and has since become known as the Vicarage and Temple Grove, which bound the site to the northwest.

More recently on 28<sup>th</sup> May 2018, the Minister for Education and Skills applied for planning permission for a new Educate Together National School within the SE-R-06 lands, immediately west of the main access point from the R609 Carrigaline Road / Carr's Hill (as indicated in Figure 2 above). The application includes a 24-classroom school building, a 3-classroom Special Needs Unit, general purpose hall with all ancillary pupil and

staff facilities, a new access road off the Carrigaline Road with set-down area, 46 no. car parking spaces, and all associated site works, boundary walls, ball courts, hard and soft play areas, and landscaping (planning application ref. 18/5369). Cork County Council issued a request for further information on 20<sup>th</sup> July 2018, seeking additional information regarding 11 no. items, including but not limited to:

- Revision of the access, internal circulation and parking/set down arrangements
- Submission of an updated School Travel Plan
- Submission of an Ecological Impact Assessment Report
- Submission of a Construction Environmental Management Plan.

The documentation was revised in accordance with the request and a formal response was lodged on 17<sup>th</sup> September 2018 by the applicant. Permission was granted by Cork County Council subject to 51 no. conditions on 15<sup>th</sup> October 2018.

The decision was subject to 3 no. third party appeals (ABP ref. 302924-18). Following an assessment by An Bord Pleanala, permission was granted on 23<sup>rd</sup> April 2019 subject to 16 no. conditions.

#### 1.1.3 Proposed Development

The proposed development is for 472 no. residential units, plus a creche (642sqm) with a capacity for c.75 childcare places, on a developable area of 13.29 ha in area. This area represents the net developable area, taking into account the lands affected by the 2 no. Irish Water wayleaves that traverse the site, woodland areas (including the area to the west protected by a Tree Protection Order), land dedicated to the greenway, and steeply sloping areas, that owing to their gradient, are unsuitable for development. The total gross site area is 21.90 ha.

The net density is 35.52 units/ha which is within both the ranges outlined for Medium A density development in the Cork County Development Plan 2014 and is in accordance with the relevant DoEHLG Guidelines. The site is divided into six-character areas as illustrated in Meitheal's Design Statement. A breakdown of each of the character areas, their respective development area and proposed number of units is set out below in Table 1 below, while Tables 2A and 2B outline the overall mix of the proposed development.

TABLE 1: NUMBER OF UNITS PER CHARACTER AREA

Character Area	Development Area	No. of Units
Village	5.53	151
Neighbourhood		
Western Woodland	1.75	56
Valley Floor	2.00	57
Parkland	2.65	63
Vicarage	0.51	47
Apartments		
Carr's Hill	0.85	98
Apartments		
Total	13.29	472

TABLE 2A: PROPOSED UNIT MIX

Unit Type	No. of Units	% of Mix
4 Bed	67	14.2
3 bed	206	43.6
2 bed	123	26.1
1 bed	76	16.1

TABLE 2B: PROPOSED HOUSING / APARTMENT MIX

Unit Type	Form	Bed	Total Proposed		
	Houses				
A1	Semi Detached	4	10		
A2	Semi-Detached	4	10		
A3	Semi-Detached	4	4		
B1	Semi-Detached / End Terrace	3	112		
B2	Terraced	3	36		
B3	Semi-Detached / End Terrace	3	11		
B4	Semi-Detached	3	8		
C1	Semi-Detached / End Terrace	4	13		
D1	End Terrace	4	12		
D2	Terraced	4	18		
Total no. of Ho			234		
	Apartments / Duple:	xes			
Type E (Various)	Corner Apartments	1	15		
Type F (Various)	Duplex	3	39		
Type F (Various)	Duplex	2	39		
Block A (Various)	Apartment	2	18		
Block A (Various)	Apartment	1	29		
Block B (Various)	Apartment	2	18		
Block B (Various)	Apartment	1	12		
Block C (Various)	Apartment	2	14		
Block C (Various)	Apartment	1	10		
Block D (Various)	Apartment	2	23		
Block D (Various)	Apartment	1	21		
		. of Apartments	145		
	TOTAL N	O. OF UNITS	472		

#### 1.1.4 Summary of Public Consultation

The applicant has engaged with a number of parties including local residents of adjacent properties (namely the detached dwellings along the laneway north of the Vicarage and the dwellings east of the proposed access onto the R609), representatives from the Vicarage and Temple Grove estates, and the owner of the Darraglynn Nursing Home to the north of the site. Among the issues discussed with were:

- Potential impact of construction traffic and noise;
- Potential impact of operational noise and traffic;
- Loss of informal walking routes through site;
- Boundary treatments;
- Visual impact.

The applicant has also been in contact with representatives of the Douglas GAA Club, Douglas Rugby Club, the Educate Together Primary School and local Councillors in order to identify local needs with regard to playing pitches, training facilities etc. In acknowledgement of feedback from this consultation, an active amenity space (i.e. informal training/playing pitch) has also been provided within the linear parkland to the west of the school. Owing to the site-specific characteristics, feasibility studies identified that the provision of a full-sized playing pitch was not feasible. However, this proposed grassed area would allow for a training area for any local teams or a kickabout area for future residents.

#### 1.2 Summary Statement of Consistency

This report provides a statement of consistency for the proposed development at Castletreasure, Douglas, Co. Cork, with reference to the relevant national and local planning policy documents, as detailed in Section 1.1. This section summarises compliance with planning policy on the following themes:

- 1.2.1 Principle of Development (including Delivery of LAP Zoning and Other Objectives);
- 1.2.2 Density and Mix;
- 1.2.3 Design, Layout and Residential Amenity;
- 1.2.4 Landscape, Recreation, Amenity and Open Space;
- 1.2.5 Environmental Impact Assessment;
- 1.2.6 Appropriate Assessment;
- 1.2.7 Archaeology and Heritage;
- 1.2.8 Visual Impact;
- 1.2.9 Infrastructure and Services;
- 1.2.10 Access, Traffic and Transport;
- 1.2.11 Part V Proposal;
- 1.2.12 Childcare Provision & Education.

#### 1.2.1 Principle of Development

Given the growth in demand for quality residential housing in recent years as well as the population / household targets outlined in both the CDP and LAP, it is evident that there is a significant demand for additional residential accommodation throughout County Cork, and in particular within Metropolitan Cork and the immediate environs of the city.

Despite the population of the South Environs increasing by 2,533 persons between 2006 and 2011, the CDP sets out a target of 31,308 people up to 2021 in the South Environs as a whole. In order to take account of household formation trends arising from a drop in the average household size, a requirement of 1,284 housing units has been identified across the South Environs up to 2021. The subject site is the largest of thirteen sites zoned for residential development within the South Environs and therefore has the potential to accommodate a significant proportion of this new residential development.

TABLE 3: EXTRACT FROM TABLE 2.2 OF THE BALLINCOLLIG CARRIGALINE MUNICIPAL DISTRICT LOCAL AREA PLAN 2017 SHOWING THE SETTLEMENTS POPULATION GROWTH AND HOUSING REQUIREMENTS

	Housing R	equirement				Housing Su	pply
	Census 2011	Population Target	Total New Households 2011-2022	New Housing Units Required	Net Housing Requirement (ha)	Net Residential Area Zoned in LAP	Estimated Housing Yield
South Environs	32,635	31,308	1,336	1,285	51	92.56	2,274
Total MD	71,946	80,446	7,685	9,144	347	416.19	10,162

The proposed development will provide 472 no. dwelling units in the short term to serve a proportion of the planned growth in housing units in the South Environs as outlined above. The proposed development will provide approximately 37% of the 1,284 housing units required in the southern suburbs of the city up to 2022. This is in accordance with objective CS 3-1 of the CDP and objective SE-GO-01 of the MD LAP which seek to facilitate the sustainable growth of the South Environs, and the wider metropolitan area.

Under the provisions of the MD LAP 2017, the subject site, located within Douglas, is zoned for residential development under the **SE-R-06** zoning objective. This objective seeks the provision of:

"Development of this site is to include the following:

Medium A density residential development to cater for a variety of house types and sizes.

3 ha of additional open space over and above what is normally required in housing areas. This open space should include a fully landscaped and useable public park.

Retain the existing trees and hedgerows within the overall development of the site.

A site for a primary school that could be accessed from the R609 and developed by the Department of Education in the short term.

The timing and provision of appropriate drinking water disposal services for the development including where necessary the upgrading of off-site infrastructure.

Provision of a cycleway.

Consideration will need to be given to the provision of a primary school within this site at the detailed planning application stage."

A small portion of the site, east of the pumping station and at the site's south west corner, is located within the **existing built up area** (despite the absence of any development here) where, under Objective ZU 3-1 of the Cork County Development Plan (CDP) 2014 the Council will:

Normally encourage through the Local Area Plan's development that supports in general the primary land use of the surrounding existing built up area. Development that does not support, or threatens the vitality or integrity of, the primary use of these existing built up areas will be resisted.

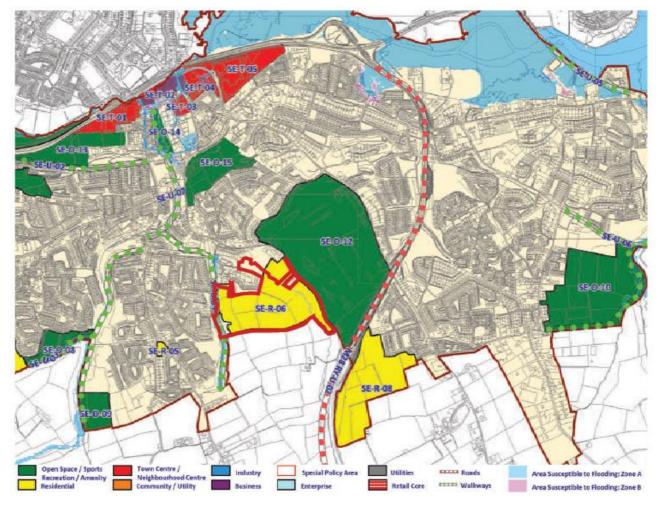


FIGURE 3: EXTRACT FROM MD LAP SHOWING SPECIFIC ZONING OBJECTIVES OF THE SITE (OUTLINED IN RED)

The proposed development is in full accordance with these zoning objectives given that:

- The net density of 35.52 the proposed development falls within the density guidelines set out for Medium A Development in the CDP (see section 1.2.2 below and National Guidelines);
- A large amount of open space is provided as part of the proposed development, with over 50% of the site dedicated to both passive and active open space (see section 1.2.4 below);
- Significant effort has been made by the design team to retain and supplement the existing trees and hedgerows on site. These are used to frame the proposed development areas and have also been utilised to contribute to the recreation and amenity value of the site;
- Land has been offered by the applicant to the Department of Education to provide a 24-classroom Educate Together Primary School within the lands zoned under the SE-R-06 objective. This application, which was permitted by Cork County Council (ref. 18/5369) in October 2018 and subject to a third-party appeal, was granted permission by An Bord Pleanala in April 2019.
- The applicant's engineers have been in consultation with Irish Water regarding the potable water infrastructure for the development. A Confirmation of Feasibility and Statement of Design Acceptance is from Irish Water are submitted by JB Barry as part of this application.
- An extension of the Ballybrack greenway, which currently forms part of a Part 8 application by Cork County Council, is provided through the site which will link with the existing greenway infrastructure in the surrounding area. This an important piece of infrastructure which will increase connectivity from the site to the surrounding area, as well as increasing permeability across the south environs by linking the site to Douglas Village to the northwest and Maryborough Ridge to the east.

Furthermore, objective **SE-U-04** of the MD LAP seeks to provide a pedestrian walk through the stream valley (along the western boundary of the site) to Douglas Village. The submitted landscape masterplan by Aecom provides a section of this pathway along the western boundary of the site. This pathway is located adjacent to the existing woodland, respecting the Tree Protection Order which protects these trees, while also ensuring the pathway benefits from passive surveillance from the proposed dwellings.

To the immediate south of the application site is a strategic land reserve (SLR3 Castletreasure), as shown in Figure 4. Cork County Council identified the need for additional strategic land reserves with a total of 17 SLR sites being considered. A high-level appraisal of the SLR sites were undertaken and resulted in the emergence of 6 no. SLR sites including SLR3 Castletreasure, which were considered to have greater capacity to deliver headroom to meet housing demand and strategic growth targets. Connections have been provided for in the application site along the southern boundary to facilitate connections to SLR3 lands in the future.

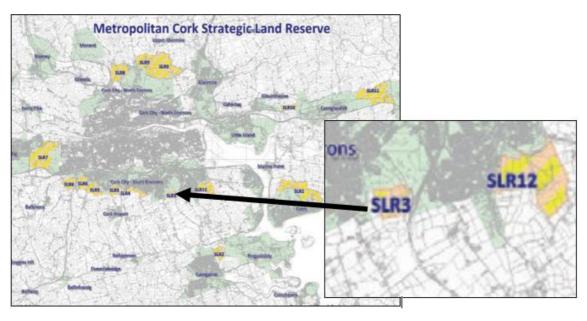


FIGURE 4: EXTRACT FROM MD LAP SHOWING LOCATION OF SLR 3 CASTLETREASURE

#### 1.2.2 Density & Mix

The proposed development provides for a mix of unit types and sizes, as detailed in Table 4 below. The mix is consistent with the local planning policy objective to reflect the established pattern of development in the area, the topographical constraints of the site, and the provision of ample public open space. The mix of unit types and sizes is also consistent with national planning policy guidelines to create a sustainable neighbourhood and balanced community, by facilitating a range of household types within the development.

**Unit Type** No. of Units **Percentage** 1-Bed 76 16.1% 2-Bed 123 26.1% 3-Bed 206 43.6% 4-Bed 67 14.2% **TOTAL** 472 100%

TABLE 4: OVERALL RESIDENTIAL MIX

The density of the scheme has been guided by the CDP, LAP and 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, 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."

Appendix A sets out guidance regarding the calculation of densities. It states that net site density provides a more refined estimate of density, by including only those areas which will be developed for housing and directly associated uses **including**:

- Access roads within the site;
- Private garden space;
- Car parking areas:
- Incidental open space and landscaping; and
- Children's play areas where these are to be provided.

When calculating net density, the following should be **excluded**:

- Major and local distributor Roads;
- Primary schools, churches, local shopping etc;
- Open spaces serving a wider area; and
- Significant Landscaping buffer strips.

Furthermore, the Guidelines also provide a checklist of criteria which should be considered when assessing the appropriate density:

 Securing development patterns that are sustainable in economic and social development and environmental protection terms;

- Is the scale of development envisaged in terms of future housing, population, retail and employment growth in line with the overall County Development Plan Settlement and Housing Strategies and any Regional Planning Guidelines in force?
- Will the plan ensure a compact and easily walkable town or village creating forms of development that will make walking and cycling, especially for local trips, more attractive than using the car?
- Are the densities being promoted in line with the densities recommended in the 2009 guidelines?
- Is the scale of the new housing development scheme in proportion to the pattern and grain of existing development?

In calculating the net density, the design team had full cognisance of Appendix A of the Guidelines, identifying a developable area of 13.29ha. The developable area is further clarified in dwg no. PLA-022-A by Meitheal Design Partners, highlighting the development areas used (set out for each individual housing/character area for clarity and in accordance with Appendix A) as well as those parts of the development which have been excluded from the calculation. In accordance with Appendix A access roads, private gardens, car parking, incidental open space, landscaping and play areas have all been included within the developable area.

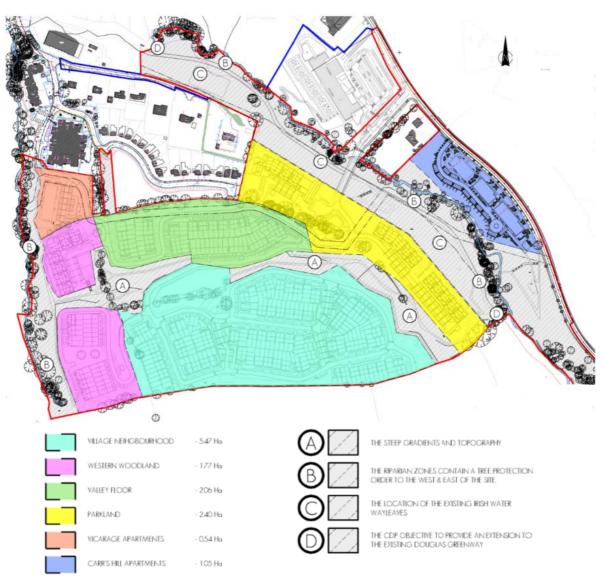


FIGURE 4: IDENTIFICATION OF NET DEVELOPABLE AREA

The following areas have been excluded from the developable area, in line with the guidance set out in Appendix A:

- The proposed shared access with the school (permitted under CCoC application ref. 18/5369 / ABP-302924-18), and the proposed road/pedestrian improvements along the R609 public road;
- The greenway and surrounding linear parkland which are both requirements of Cork County Council. The Greenway is provided in accordance with the current Part 8 application for the expansion of the Ballybrack Cycleway across the South Environs, while the parkland is a requirement of the site-specific zoning objective to provide 3 ha of additional open space over and above what is normally required in housing areas, to include a fully landscaped and useable public park. This open space and greenway will serve not only the proposed development but also the wider area;
- The wooded areas along the western boundary (including the area protected by the Tree Protection Order), along the streams and its associated riparian protected zone, and within the eastern corner of the site adjacent to the R609.

While not specifically detailed by the guidelines, the design team were also required to exclude other areas from the calculation due to the site-specific characteristics of the site, specifically:

- The wayleave which runs west to east through the site from the existing pumping station has also been excluded due to its strategic importance in serving Ringaskiddy, as specifically requested by Irish Water during pre-planning consultations;
- The area of land owned by the applicant which runs through the existing open space at the Vicarage;
   and
- Areas of prohibitively steep gradient which due to their topography, could not be utilised for housing development.

Utilising the identified net developable area of 13.29ha, the proposed scheme achieves a net density of 35.51 units per hectare (472 no. units / 13.29ha). 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 been achieved by the removal of detached dwellings from the previous housing mix proposed at pre-application stage, and an increase in the number of duplexes / apartment units, particularly in the area immediately south of the R609 Carr's Hill Road. This has had the resultant benefit of creating a more urban character along the R609 while also providing appropriate overlooking of the central parkland and other open space areas.

The scheme has also had full regard to the checklist criteria outlined in Chapter 6 including;

- The development is sustainable from an economic, social and environmental perspective, as it provides important social infrastructure (school, creche, greenway, bus stop, amenity areas and parkland), and also has regard to the challenging topography on parts of the site, whilst also incorporating existing trees and hedgerows as part of the layout;
- The scale and density are fully consistent with both the CDP and LAP, as well as national guidelines;
- The provision of the greenway, footpath connections and a bus stop, will facilitate walking, cycling and public transport. These measures will also increase connectivity in the wider area, providing easier access to Douglas Village to the northwest as well as Maryborough Ridge to the east;
- The scale and density of the new housing development scheme reflects the pattern and grain of existing development and reciprocates the higher density of the Temple Grove apartments, while also increasing the density in appropriate areas such as along the edges of the central parkland to increase passive surveillance, and along the R609 creating a new urban interface in this location. It also is respectful to and protects the amenities of the Vicarage and other lower density residential areas adjoining the site.

Overall, we consider that the density of development, which has been increased from that proposed at preapplication stage, 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.

#### 1.2.3 Design, Layout & Residential Amenity

Objective HOU 3-1 of the CDP requires that all new developments will have regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying *Urban Design Manual* while objective HOU 3-2 requires the submission of a design statement with all applications for residential development to clearly outline how the proposed development achieves this compliance. This is in order to facilitate the proper evaluation of the proposal relative to these guidance documents as well as the key objectives of the CDP, with regard to the creation of sustainable residential communities.

In line with these requirements a Design Statement, which has full regard to advice provided in Objective HOU 3-2 and the relevant supporting text of the CDP in relation to the content and detail of the required Design Statement as well as the relevant Departmental guidance, is submitted as part of the subject planning application. This statement by Meitheal Design Partners assesses the accordance of the proposed development with the 12 no. design principles set out in the Urban Design Manual, specifically:

- Context
- Connectivity
- Inclusivity
- Variety

- Efficiency
- Distinctiveness
- Layout
- Public Realm
- Adaptability
- Privacy and Amenity
- Parking
- Detailed Design

Table 2.2 of this statement provides a brief preliminary overview of how the proposed development has considered and incorporated these principles in the design.

Note this document should be read in conjunction with the Green Infrastructure Landscape Strategy by Aecom and the Planning and Design Statement by McCutcheon Halley which provide further detail in this regard.

#### 1.2.4 Landscape, Recreation, Amenity & Open Space

Cork County Council requires all new residential development to comply with its policies to ensure the adequate provision of community and amenity facilities to meet the needs of future residents of the development. As outlined in Objective SC 5-2: Quality Provision of Public Open Space of the CCDP, County's Recreation and Amenity Policy 2006 indicates standards for the provision of public open space in residential developments.

As stated in Appendix A of the CDP, generally is it is expected that between 12% to 18% of a site for development, excluding areas that are unsuitable for house construction, should be allocated to the provision of public open space, and this provision shall increase as the density of the development increases. The proposed development surpasses this requirement, providing approximately 41.8% active open space. The full open space provision is outlined in the following table.

TABLE 5: PROVISION OF PASSIVE & ACTIVE OPEN SPACE

		Areas (Ha)	Percentage
Total Site Area		21.9	100.00%
Α	Total Passive Open Space Including retained woodland and sloped areas	2.2	19%
В	<b>Total Active Open Space</b> Including adaptable woodland, parkland and play areas	8.2	34%
Total Open Space (i.e. A. Passive + B. Active above)		10.4	53%

This policy also states that the provision of recreational facilities shall be provided as part of the housing development at a rate of 1 point per 6 units with a minimum of 30% of the required points to be satisfied by the provision of on-site local facilities. The remainder shall be satisfied by the provision of facilities at an agreed off-site location. The remainder shall be satisfied by the provision of facilities at an agreed off-site location or via a cash equivalent in lieu of on-site provision, at a rate of €18,400 per point.

The Recreation and Amenity Policy allocates a points value for varying types of facilities, as detailed in Table 4.2 of the Council's document, but it also notes that alternative facilities can be provided at the discretion of the Planning Authority. Therefore, while the Council's policy provides a strong framework for minimum requirements in relation to recreation and amenity, it also allows for a good degree of flexibility to respond to the specific needs of a development or community, at the discretion of the Planning Authority. In line with the requirements of the Recreational and Amenity policy there is a total recreational requirement equivalent of 79 points across the proposed development site. This equates to a minimum provision of 23.5 points (i.e. 30%) across the site.

The proposed development will feature a number of recreation and amenity opportunities, some of which are not explicitly outlined in the Council's points table. These features include the provision of a greenway route through the linear open space of the site. In calculating the points value of the greenway, we note that a 'Grassed Playing Pitch' equates to 42 points and in accordance with the Recreational and Amenity Policy is 0.8 hectares in size giving a points equivalent of 1 point per 190 sqm. As developing the greenway would be as or even more expensive than developing pitches in accordance with the Recreation and Amenity Policy, we consider that the points value of this facility should be calculated on a pro rata basis based on site area and at a points value of 1 point per 190 sqm. With an approximate total area of 2477 sqm (i.e. length of walkway 0.619km times width 4m), this would give a point equivalent of 13 for the proposed greenway route.

In addition, in acknowledgment that the public already uses the subject site for informal walking routes, there are also a series of activity trails proposed which traverse the site including a 1.4km long play trail and a 2.5km fitness trail<sup>2</sup>. As above, we calculate that these trails would have a point equivalent of **14** and **15** respectively. These trails link a series of more localised open spaces, recreation and play areas, which in turn link to the proposed housing clusters, which is in keeping the 'Sustainable Residential Development in Urban Areas Guidelines' and Cork County Council policy. These include 2 no. local play areas (at 3 points each), 5 no. neighbourhood play areas (at 1 point each) and a Half Court Games Area at 29 points. These additional local recreational amenities have a point equivalent of **69**.

Overall, the recreation and amenity facilities proposed equate to a points value of **82** points. When considered both in terms of quality and quantity, the recreational and amenity facilities proposed are in excess of the points required by the Recreation and Amenity Policy and beyond the Council's normal recreation points requirement.

<sup>&</sup>lt;sup>1</sup> 2m wide play trail

<sup>&</sup>lt;sup>2</sup> 2.5m wide fitness trail

It should also be noted that an active amenity space has been incorporated within the linear parkland to the west of the school following consultations with local councillors, the Douglas GAA Club and the Douglas Rugby Club. Given the site-specific characteristics and constraints within this area, the provision of a full-sized pitch was not feasible. However, the grassed area provided is adequate to be used as a training space for any local teams or a kickabout area for future residents. Given that the points requirement has already been exceeded across the site, the applicant has not sought a points equivalent for this amenity space.

With regard to private open space, the private open space provided will be in line with the standards contained in the relevant guidance documents and in accordance with Objective SC 5-8 of the CDP. Each dwelling will be provided with both a front and rear garden. The front garden will serve as a transitional space between the public street and the private realm and will also provide parking for each unit. The rear garden is truly private space, serving each individual dwelling. Apartment and duplex units will also benefit from their own external private open space through the provision of balconies and terraces. The proximity of these units to the on-site recreation ad amenity facilities will ensure a high standard of living for all future residents of the proposed development.

#### 1.2.5 Environmental Impact Assessment

In accordance with the Planning and Development Regulations, 2001 and current government and EU guidance the Planning Authority must screen the proposed development for Environmental Impact Assessment (EIA) and decide the planning application for the proposed development does or does not require an Environmental Impact Assessment Report (EIAR).

Part 1 and Part 2 Schedule 5 of the Planning and Development Regulations, 2001 defines the categories and thresholds of developments requiring an EIAR. We consider that the most appropriate threshold against which the proposed development should be assessed is Section 10 Infrastructure Projects, which specifies that a project involving urban development of 10 hectares or greater in a built-up area or 20 hectares elsewhere would require an EIAR.

The subject application seeks permission for 472 units on a site of 21.9 ha in area which is in excess of the above specified threshold and therefore an EIAR was undertaken as part of the application which assesses the environmental impacts of the proposed development on the site and the surrounding area. This EIAR by McCutcheon Halley Planning is enclosed as part of the planning application documentation.

Informal scoping with Cork County Council has been undertaken to inform this process. In addition to the informal scoping with Cork County Council, the following prescribed bodies / stakeholders have been consulted in relation to the general scope of the EIAR:

- a) Department of Culture, Heritage, & the Gaeltacht (Development Applications Unit)
  - i. National Monuments Services;
  - ii. National Parks & Wildlife Service;
- b) Department of Education;
- c) Geological Survey Ireland;
- d) Transport Infrastructure Ireland;
- e) The Health Safety Authority;
- f) The Health Service Executive;
- g) Bird Watch Ireland;
- h) Inland Fisheries Ireland;
- i) Bat Conservation Ireland;
- j) Irish Water.

The EIAR was prepared having regard to the Environmental Protection Agency's *Draft Guidelines on The Information to be Contained in Environmental Impact Assessment Reports* which have been drafted and issued to help practitioners during the transition to the new EIA regulations.

#### 1.2.6 Appropriate Assessment

Article 6.3 of the Habitats Directive 92/43/EEC requires that an Appropriate Assessment (AA) should be carried out where plans or projects may have a significant effect on the conservation objectives that would ultimately affect the integrity of Natura 2000 sites. A Natura Impact Statement (NIS) has been carried out by Kelleher Ecology and Associates and is submitted as part of the SHD planning application submission. The NIS objectively concluded that with the application of mitigation measures, no significant effects arising from the proposed development are likely to occur in relation to the Natura 2000 sites, including Cork Harbour SPA and Great Island Channel SAC.

#### 1.2.7 Archaeology and Heritage

Objectives HE 2-3 and 2-5 require the protection and enhancement of areas of biodiversity value, including woodlands. The subject site contains a number of such features including the stream and woodland which bisects the site from east to west and the area of woodland to the west which is subject to a Tree Protection Order (TPO). These features will be retained in situ as part of the proposed development. The Green Infrastructure Landscape Strategy prepared by AECOM and submitted in support of this SHD application, provides a map (Figure 4b) showing the tree protection zones.

With specific regard to the woodland and hedgerows, the existing trees and shrubs will be protected during construction and will form part of the passive amenity space for the future housing clusters. Some areas will also be utilised as active open space, containing trails and walkways linking to the proposed play areas and housing clusters. The proposed landscaping framework will also introduce supplementary tree and hedgerow planting wherever practicable to strengthen the existing landscape framework and increase its biodiversity potential. The Douglas Stream to the west and the Moneygurney Stream which bisects the site will be protected, emphasising these as strong landscape features and ecological corridors. They will also be protected appropriately during construction and operation. These features will preserve and enhance the existing habitats on site and be managed in a sustainable way, in line with Object GI 3-1 of the CDP regarding green infrastructure.

The proposed development will also be assessed in terms of its impact on the archaeological and built heritage pertaining to the site. An EIAR is currently being prepared in this regard which will fully assess the cultural and built heritage of the site and its surrounding area. Preliminary findings identify that:

- There are no recorded archaeological sites located within the site boundary. There are 13 no. recorded archaeological sites within a c.1km radius of the site (i.e. the study area) and therefore potential exists for the presence of unrecorded sub-surface archaeological features and artefacts within the proposed development site;
- There are no National Monuments located within the site boundary or surrounding study area;
- There are no archaeological monuments subject to Preservation Orders or on the Register of Historic Monuments within the site or the surrounding study area;
- There are no protected Structures within the proposed development site however there are 15 no.
   protected structures located within the surrounding study area;
- There are no NIAH listed structures within the proposed development site however there are 27 no. examples located within the surrounding study area.

Based on the above, the applicant is proposing to carry out pre-construction geophysical and archaeological test trenching in specific areas of the site with archaeological potential pre-construction.

#### 1.2.8 Visual Impact

The proposed development has been designed to minimise adverse impacts on the visual and scenic amenities of the surrounding local environment. While the landscape context of the site is partly suburban and not considered to be particularly vulnerable, nonetheless, significant effort will be made to protect the character of the dynamic views of more sensitive areas in so far as is practicable. This has been achieved through considered design and siting, the incorporation of appropriate landscaping and the protection of existing landscape features such as woodland and hedgerows, as is required by the site-specific zoning objective.

The visual impact of the proposed development has been assessed as part of the Landscape and Visual Impact Assessment which forms part of the EIAR. Where any significant impacts are identified, mitigation measures are proposed to address this impact. This approach ensures compliance with Objectives GI 6-1 and GI 7-1 of the CDP which promotes the protection of landscape features, general views and prospects.

#### 1.2.9 Infrastructure & Services

Chapter 11 of the CDP generally provides the main policy framework by which the proposed development should be assessed in terms of infrastructure and servicing. These policies generally relate to waste water, potable water, surface water and waste management.

In terms of wastewater and potable water services, the proposed development will connect with the existing public systems in the area. The design team have consulted with Irish Water throughout the pre-application process.

Following the submission of a Pre-Connection Enquiry, Irish Water issued a Confirmation of Feasibility confirming that the proposed development can be serviced by the existing foul sewer network in the area, subject to the applicant entering into a Project Works Services Agreement (PWSA) with Irish Water. A detailed design for the foul water system within the development was submitted to Irish Water at pre-application stage for review, which led to the issue of a Confirmation of Design Acceptance from Irish Water. Copies of the Confirmation of Feasibility, the executed PWSA and Confirmation of Design Acceptance are included as part of the application. With regard to potable water, the Confirmation of Feasibility verifies that the proposed development can be serviced by the existing water supply network. A detailed design, including a hydraulic assessment of the water supply system within the development, was submitted to Irish Water for review arising from which Irish Water issued a Confirmation of Design Acceptance (included as part of the application). This approach is in line with Objective WS 3-1 of the CDP.

Objectives WS 5-1, WS 5-2, and WS 5-3 deal specifically with surface water management and require the incorporation of SuDS in all new housing development as a method of managing surface water runoff, as well as the subsequent protection of existing watercourses where relevant. The site is not located within an area at risk of flooding, however owing to the location of both the Douglas and Moneygurney Steams within the site, and the existence of flood risk downstream of the proposed development, a Flood Risk Assessment (FRA) has been carried out for the proposed development and accompanies this submission to An Bord Pleanala. This report concludes that the principles of SuDS should be implemented on site in order to prevent any increased flooding downstream of the proposed development.

In line with the specific objectives of the CDP and the findings of the FRA the proposed storm water drainage system will incorporate SuDS features to reduce run-off and provide biodiversity benefits. The Summary of Engineering Issues by JB Barry which accompanies this submission outlines the specific details of the proposed scheme. Notwithstanding these proposed measures, the development will also include the construction of a gravity surface water drainage network throughout the site to include the installation of dedicated attenuation facilities upstream of the proposed outfalls to the Moneygurney and Douglas streams,

to attenuate discharges to the undeveloped greenfield run-off rates with the operation of proprietary hydrobrake devices.

Furthermore, both the Douglas and Moneygurney Streams are proposed to remain in situ during both construction and operation to minimise any biodiversity impacts. In line with the requirements of WS 5-2, these streams will be protected during construction and operation, with development located a sufficient distance away, generally greater than 10m where appropriate.

In accordance with Objective WS 7-1 of the CDP, a Construction and Environmental Management Plan will be submitted in support of the planning application to mitigate any potential impact of the construction phase on the environment. Any waste generated by the proposed development during operation will be managed in accordance with established best practice.

#### 1.2.10 Access, Traffic & Transport

The principle point of access to the proposed development is facilitated from the R609 Carrigaline Road/Carr's Hill which bounds the site to the north/east. This roadway will also facilitate access to the permitted school development was approved by An Bord Pleanala in April 2019 (ref. 18/5369 / ABP-302924-18). A second access is also proposed further west along the R609 to serve 98 no. apartments/duplexes proposed to the north of the central spine of open space. Access is also provided via the existing roadways serving the Temple Grove apartments to the north/west. These link roadways are in turn fed by a series of local streets, offering direct access to the various residential neighbourhoods/housing clusters. The proposed site is also located west of the Carrs Hill Interchange which is proposed to be upgraded as part of the recently approved M28 Cork to Ringaskiddy Project Motorway Scheme. Owing to the potential impact of the proposed development on the local and national road network, a Traffic and Transport Assessment (TTA) has being prepared by JB Barry and is submitted to the Board as part of the SHD application submission. The TTA forms part of Chapter 5A of the EIAR. The TTA concludes that the proposed development is well located with proposed pedestrian and cycle facilities and has good public transport options available to commuters from Douglas Village to Cork City. It further notes that the level of traffic generated during the construction phase will be less than that generated by the development once operational. The TTA also concludes that the assessment of the operational activities of the proposed development indicate that there is a slight to moderate impact experienced by the local link roads as a result of the traffic generated and that the increase is moderate and not deemed significant as the link roads operate well within capacity.

Objective TM 2-1 and TM 2-2 of the CDP prioritise walking and cycling as a mode of sustainable transport. In accordance with these policy provisions, a comprehensive network of linked roadways, footpaths, walking trails, and cycleways are provided across the site. These are complimented by a comprehensive landscape framework which will enhance the physical environment for both pedestrians and cyclists. An extension to the existing greenway network (subject to concurrent Part 8 process) is also proposed through the proposed liner parkland which will increase permeability across the south Douglas area and beyond.

The site layout has also been informed by the Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport & Department of Environment, Community and Local Government, 2013, and in accordance with DMURS, provides a network of streets, pedestrian priority areas including home zone areas, and traffic calming where necessary. Section 2.3 of this report provides a brief preliminary overview of how the proposed development has considered and incorporated the key design principles of DMURS where relevant.

#### 1.2.11 Part V Proposal

Objective HOU 4-1 of the CDP (Reserved Land for Social Housing) requires a percentage of all new residential developments to be made available for social housing. The requirements of the amended Planning and

Development Regulations (2015), pursuant to Part V, s.96 of the Planning and Development Act 2000 (as amended) requires a provision of 10% social housing.

The applicant proposes to meet the site-specific Part V obligation through the transfer of 47 no. dwelling units on site, specifically 19 no. 1 bed apartments (Apartment Type G)), 20 no. 2 bed apartments (in variation of Unit Types E and G), 4 no. 3 bed house (House Type B2 & B3) and 4 no. 4 bed house (House Type D1 & D2). In line with Council Policy these units are dispersed in clusters through the proposed development. An assessment of the 'Part V Costs Methodology', based on industry cost standards, is attached to the Part V Proposal for each unit type in support of the SHD application. The proposed Part V Site Layout Plan, floor plans and elevations illustrate the units proposed to be transferred. Consultation with Cork County Council Housing Officer, Richard Keating, was undertaken and is included as part of the planning application. Furthermore, in acknowledgment of the impending expansion of the Cork City administrative area boundary, a copy of the Part V submission has also been sent to Brian Geaney in the Housing Department of Cork City Council on Thursday 11th April 2019. No response has been received at the time of writing.

#### 1.2.12 Childcare Provision & Education

Objective SC 3-1: Childcare Facilities of the CDP requires proposed developments support and facilitate the sustainable provision of childcare facilities in accordance with the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006.

Appendix 2 of the '2001 Childcare Guidelines for Planning Authorities' establishes an indicative standard of one childcare facility per 75 dwellings in new housing areas (Paragraphs 2.4 and 3.3.1 refer). One facility providing a minimum of 20 childcare places is considered to be a reasonable starting point in this regard. The Guidance acknowledges that other case-specific assumptions may lead to an increase or decrease in this requirement.

The proposed development consists of 472 no. dwelling units and makes provision for a crèche of 642 sqm which will facilitate 75 no. childcare places. This facility is located to the north of the site, immediately south of the proposed primary school and near the main entrance to the site from the R609. This provision is based on a number of factors including the statistical analysis of census data and the preliminary findings of a Childcare Assessment of the existing childcare facilities in the surrounding area by McCutcheon Halley.

Based on the demographic profile of the area it is estimated that the proposed development will generate a total population of between 1132 – 1321 people with between 80 - 93 pre-school aged children (aged 0-4 years)<sup>3</sup>. The Childcare Assessment, which will be submitted as part of the planning application documents, identified that there is a total of 20 no. creches within a 10-minute drivetime of the site.

Notwithstanding this and given that many future residents will likely commute to work and therefore are likely to avail of childcare facilities elsewhere, this facility is considered to be of ample size to cater for the needs of the proposed development. This provision has regard to the size and mixed tenure of same as well as the need to safeguard the viability of the identified established service offer locally.

The requirement for the provision of a school site within the lands zoned under the SE-R-06 objective was identified in an assessment by the Department of Education and forms part of the site-specific zoning objective, in order to facilitate the future expansion of the South Environs in this area. This application is independent of the subject SHD application and is currently being assessed by Cork County Council, ref. 18/5369.

<sup>&</sup>lt;sup>3</sup> Assuming average household size in the range of 2.4 to 2.8 people \* 472 units and c.7.1% of the population aged between 0-4 years, consistent with current profile in the Douglas Electoral Division.

# 2.0 National Planning Policy

### 2.1 Sustainable Residential Development in Urban Areas, 2009

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 3 The Role of	Application of 12 Best-Practice Criteria	Compliance with each of the criteria is addressed in section 2.2.
Design	Have designers carried out a site appraisal prior to preparing a layout.	Yes – detailed site investigation works, and appraisal have been carried out.
	Is the standard of design of a sufficiently high standard?	Yes – design complies with design guideline requirements and has been designed to a high standard.
	Does the design of residential streets strike the right balance between the different functions of the street, including a sense of place?	Yes – layout provides for a hierarchy of streets as well as various residential character areas with local level access roads and footpaths. Cycling is provided along the proposed amenity trails as well as through the shared surface areas within the road network and along the proposed greenway extension.
Chapter 4 Planning for	Are lands in accordance with sequencing priorities of development plan / LAP?	Yes – site is zoned for residential development in the Ballincollig-Carrigaline MD LAP.
Sustainable Neighbourhoods	Assessment of the capacity of existing schools.	Yes – permission has been granted by An Bord Pleanala for a 24-classroom primary school within lands to the north (also under the ownership of the applicant). An assessment of the existing primary and secondary schools has also been carried out and concludes that there should be ample capacity to meet future demand. This is further addressed in Section 1.2.12 of this Statement of Consistency.
	Input of other necessary agencies.	Yes – Irish Water were consulted in development of proposed layout.
	Appropriate range of community & support facilities.	Yes – creche, linear parkland, greenway, amenity spaces, activity trails and play areas are provided for on-site. Site is close to existing facilities and amenities available in Douglas and the surrounding area. It is 1.2 km from town centre at Douglas; 1 km from the nearest primary school; and 2km from the closest secondary school.
	For higher density schemes, is there adequate existing public transport, or will it be provided in tandem with development.	Yes – existing no. 223 bus route (between Haulbowline Naval Base and Cork South Mall) available along the R609. Upgraded bus stop will be provided as part of the primary school application within the adjacent site.
	Will the development:	
	- Prioritise public transport, cycling and walking.	Yes — environs provide a good network of footpaths and dedicated cycle paths and provide improved access to the existing bus route. Layout of proposed development provides good pedestrian and cycle environment internal to the development and good links to public transport, cycle paths and footpaths in the environs. The proposed greenway will link to the existing greenway network, thereby increasing permeability through out the south Douglas area.
	- Ensure accessibility for everyone	Yes – layout and unit design comply with the requirements of Part M of the Building Regulations and principles of Universal Design.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	- Encourage more efficient use of energy	Yes – layout encourages walking and cycling. Units are designed to achieve compliance with the latest standards as set out in the Building Regulations.
	<ul> <li>Include right quality &amp; quantity of public open space.</li> </ul>	Yes – provision of 34% active open space, designed to create usable spaces for all ages and abilities, that are of high amenity & aesthetic quality.
	<ul> <li>Include measures for satisfactory standards of personal safety and traffic safety.</li> </ul>	Yes - road layout compliant with DMURS requirements.
	- Present an attractive and well-maintained appearance.	Yes – layout ensures appropriate balance between private and public space, public space will be easy to maintain and is well overlooked to ensure passive surveillance, discouraging antisocial behaviour, littering or vandalism.
	<ul> <li>Promote social integration, provide for diverse range of household types, age groups and housing tenures.</li> </ul>	
	- Protect and where possible enhance the built and natural heritage.	Yes – new planting will increase the bio-diversity of the site and reinforce the existing boundary conditions. As per the site-specific zoning objective, hedgerows and trees throughout the site will be retained and supplemented wherever possible.
	- Provide for Sustainable Drainage Systems.	Yes – the design and management of surface water (SW) for the proposed development will comply with the requirements of Cork CoCo. The Surface Water Management proposals and specific SuDS measures are outlined in the accompanying documentation by JB Barry Engineers.
Chapter 5 Cities and Larger Towns	Are residential densities sufficiently high in location which are, or will be, served by public transport.	
	<ul> <li>Are higher densities accompanied by high qualitative standard of design and layout?</li> </ul>	Yes – design and layout provide for high qualitative standard of units and private and public open space.
	Does design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking?	been considered in the proposed layout.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 7 The Home and Its Setting	<ul> <li>In higher density developments, does quality of design and finish extend to individual dwellings and its immediate surroundings.</li> </ul>	Yes – external finishes and landscape design have been designed to provide a high-quality environment.
	<ul> <li>Decent levels of amenity, privacy, security and energy efficiency.</li> </ul>	Yes – all units have access to private space and public open space is well overlooked. The availability of the linear parkland as well as the expanded greenway will also ensure higher level of amenity.
	<ul> <li>Will orientation of dwellings and internal layout maximise levels of daylight and sunlight?</li> </ul>	Yes — all dwellings have been designed to maximise daylight and passive solar energy gains. Housing units are dual aspect to ensure maximum exposure to direct sunlight throughout the day.
	<ul> <li>Has privacy been considered in design of the home.</li> </ul>	Yes – layout designed to avoid overlooking by adjacent properties. All units will comply the requirements of Part E of the Building Regulations in terms of noise insulation
	<ul> <li>Has the design sought to create child and pedestrian friendly car-free areas?</li> </ul>	Yes — good pedestrian and cycling routes throughout the development, with car free access to open spaces.
	- Do all houses have an area of private open space behind the building line?	Yes – back gardens are provided as standard for all housing units while apartments will also benefit from their own private balcony/terrace.
	<ul> <li>Has the design been influenced by the principles of universal design?</li> </ul>	Yes –the design complies with the requirements of Part M of the Building Regulations and principles of Universal Design.
	<ul> <li>Has adequate provision been made for the storage and collection of waste materials?</li> </ul>	Yes – adequate space for the storage of bins will be provided for all units, either to the side of the housing units, in dedicated bin stores in the front curtilage of terraced/duplex units, or storage yards of the duplex apartments/apartment blocks.

### 2.2 Urban Design Manual – A Best Practice Guide, 2009

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
1. Context: How does the development respond to its surroundings?	<ul> <li>The development seems to have evolved naturally as part of its surroundings.</li> <li>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</li> <li>Form, architecture, and landscaping have been informed by the development's place and time.</li> </ul>	The proposed development is located at the southern edge of South Environs. The exiting configuration of the surrounding development and roadways allows the proposed layout to respond to the existing context while also considering the site's constraints, potentials and topographical context.
	<ul> <li>The development positively contributes to the character and identity of the neighbourhood.</li> <li>Appropriate responses are made to the nature of specific boundary conditions.</li> </ul>	The landscape context and the need to provide a significant amount of open space has informed the design, leading to the proposed scale, massing and urban grain of the development which is appropriate to the surrounding context.
		The density of the proposed development is in accordance with the site-specific zoning objective, providing pockets of varying density to reflect the specific context. For example, apartment blocks have been provided to the south of he existing Temple Grove development which mimic the density of the existing area and bridge between that and the proposed housing units.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		The form and design of the buildings has been developed to reflect market demand while also incorporating elements of contemporary detailing which signifies the specific time and place. The landscape masterplan has been developed to provide a structure which strengthens and supports the overall design concept. This approach will ensure that the scheme will act as an attractive and sustainable residential expansion while also positively contributing to the character and identity of the surrounding Maryborough area.
		With regard to boundary conditions, existing boundaries including hedgerows will be retained and supplemented where appropriate to minimise the impact on existing habitats as well existing residents if the immediately surrounding area.
2. Connections: How well connected is the new neighbourhood?	<ul> <li>There are attractive routes in and out for pedestrians and cyclists.</li> <li>The development is located in or close to a mixed-use centre.</li> <li>The development's layout makes it easy for a bus to serve the scheme.</li> </ul>	The proposed development is set around a wide network of streets, interlinked pedestrian and cyclist pathways and open spaces. This network will ensure a permeable, and easily navigable development for future residents.
	<ul> <li>The layout links to existing movement routes and the places people will want to get to.</li> <li>Appropriate density, dependent on location, helps support efficient public transport.</li> </ul>	While the site is bisected by the linear parkland, every effort has been made to maximise connectivity and permeability through the site. A hierarchy of roads runs through the site, with the primary access route being from the proposed junction on the R609 adjacent to the school. This access road bridges the open space and meanders through the site, generally following the contours and optimising gradients where possible. From this road there are a series of secondary routes and local streets which offer direct access to each residential cluster as well as access to existing residential areas, particularly the Vicarage and Temple Grove.
		These routes, which facilitate the dispersion of vehicular traffic through the site, are designed to favour pedestrians and cyclists, creating a safe and overlooked environment. Home zones and shared surfaces have also been included to ensure a safe pedestrian environment.
		The creche is located along the primary access road offering the community easy access to this important local service. This location is also appropriate in terms of proximity to existing bus stops along the R609.
		Furthermore, in acknowledgement of the existing use of the site as an informal walking route for locals, a series of activity trails are proposed throughout the site, including a 1.4km long play trail and a 2.5km fitness trail. The proposed greenway extension will also ensure connectivity to the surrounding area by facilitating a direct pedestrian/cyclist

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		connection via the existing greenway network to Douglas and across the South Environs. Proposed Part 8 improvements to this network identify the subject site as a key element in the expansion of the greenway network, by providing a link eastward towards Maryborough. This connection will improve connectivity throughout the southern suburbs of the city.
3. Inclusivity: How easily can people use and access the development?	<ul> <li>New homes meet the aspirations of a range of people and households.</li> <li>Design and layout enable easy access by all.</li> <li>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</li> <li>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</li> <li>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</li> </ul>	The proposed dwellings offer a broad range of accommodation choice, in terms of both unit size and configuration. This variety will be attractive to a range of people and household types. The design and layout of the proposed development will meet the requirements of all relevant documents, in particular Part M of the Technical Guidance Documents which deal with accessibility and inclusivity.  Public, Private and Communal amenity spaces will be developed to suite children of varying ages, teenagers, adults and seniors, where relevant. For example, the provision of play areas and the play trail are catered towards children while the fitness trail is proposed to cater towards adults.  These spaces will be well defined and accessible to all. This will encourage the utilisation of the public realm by the community. All buildings are designed to provide passive surveillance of the public realm, including streets, paths and open spaces. They will also present a positive aspect to passers-by avoiding unnecessary physical and visual barriers.
4. Variety: How does the development promote a good mix of activities?	<ul> <li>Activities generated by the development contribute to the quality of life in its locality.</li> <li>Uses that attract the most people are in the most accessible places.</li> <li>Neighbouring uses and activities are compatible with each other.</li> <li>Housing types and tenure add to the choice available in the area.</li> <li>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</li> </ul>	The development is primarily residential, in accordance with the zoning objective of the site. However, a creche has been provided as part of the proposed development as well as a primary school which is subject to a separate planning application. These facilities are located centrally and will be invaluable to future residents as well as existing residents in the area.  A wide variety of house types have also been provided in a choice of 1, 2, 3 and 4 bedroom, townhouses, semi-detached, detached, duplex and apartment variations. This will add to the choice available in the area and directly address the current shortage and resultant demand for high quality residential units in the South Environs and throughout Metropolitan Cork.
5. Efficiency: How does the development make appropriate use of resources, including land?	<ul> <li>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</li> <li>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and</li> </ul>	With consideration to the gross site area, the actual developable area of the site, the zoning requirements and general design requirements, the design seeks to strike an appropriate balance between achieving the required densities alongside open space requirements to ensure that the zoned land is

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	incorporate sustainable urban drainage systems.  Buildings, gardens and public spaces are laid out to exploit the best solar orientation.  The scheme brings a redundant building or derelict site back into productive use.  Appropriate recycling facilities are provided.	used efficiently, whilst quality of environment and place is retained.  Higher densities have been achieved in the form of duplex apartments, apartment blocks and townhouses which are appropriately sited along major street frontages and close to existing higher density residential areas. These higher densities will create a critical mass to allow for efficient use of public transport in the area as well as increased use of the greenway to access the local town centre in Douglas.  The use of duplexes and split level housing also makes efficient use of the land and respects the existing topography where required, minimising the level of cut and fill.  Landscaped areas consist of the open spaces containing play areas, amenity trails, the greenway, and the more passive areas of open spaces including the woodland areas to the west of the site as well as along the central stream corridor. These will provide both passive and active amenity opportunities for the residents of the proposed development while also enhancing the biodiversity of the site. SuDs principles have also been incorporated wherever possible.
6. Distinctiveness: How does the proposal create a sense of place?	<ul> <li>The place has recognisable features so that people can describe where they live and form an emotional attachment to the place.</li> <li>The scheme is a positive addition to the identity of the locality.</li> <li>The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.</li> <li>The proposal successfully exploits views into and out of the site.</li> <li>There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.</li> </ul>	The southern suburbs of the city have been subject to significant expansion in recent decades, particularly in terms of residential development. As such, there is little by way of distinctive character in the immediate area of the site from which the proposed development might draw inspiration from.  The development has therefore tried to create a series of recognisable features and character areas which reinforce a sense of place and attachment for future residents. In total 6 no character areas are proposed, each with their own independent style but also complementary to each other.  The buildings will use materials, proportions and features that respect and enhance the existing local setting, but express it in a more contemporary way. Careful consideration will be given to the individual housing clusters and neighbourhood areas, balancing a palette of materials that will offer a cohesive and mixed layout, whilst respecting the existing houses within the locality.  The proposal also utilises existing site features and exploits same to create a distinctive and recognisable built environment. Where appropriate, dwellings will benefit from attractive views both internal to the site (i.e. of the proposed open spaces/parkland, existing woodland areas etc.) as well as longer range

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		views over the surrounding countryside and townscape.
7. Layout: How does the proposal create people-friendly streets and spaces?	<ul> <li>Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.</li> <li>The layout focuses activity on the streets by creating active frontages with front doors directly serving the street.</li> <li>The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.</li> <li>Traffic speeds are controlled by design and layout rather than by speed humps.</li> <li>Block layout places some public spaces in front of building lines as squares or greens, and some semi private space to the back as communal courts.</li> </ul>	The proposed layout responds to the site by exploiting existing features, orientation, views and topography where possible to maximise the potential of the site.  While roadways will be designed to provide optimal gradients where possible, a balance has been made between engineering requirements and the need to compliment the topographical character of the site for which the area is renowned. The proposed layout therefore responds to the slope, creating a permeable development with a hierarchy of routes and desire lines which will make the entire development easy and logical to navigate.  Where possible housing clusters follow the contours of the site which ensures that the development sits into the landscape. Every effort has been made to ensure that the levels of the houses follow the natural gradient of the site to be maintained wherever possible. The introduction of duplex units aids this.  The proposed layout provides for and ensures connectivity to the completed residential area to the north including the Vicarage and Temple Grove. Connectivity will also be provided to the proposed primary school, with the creche colocated to create a central point of activity within the site. All routes are scaled appropriately to enhance legibility. In general speed will be controlled through passive measures including careful curvature of roads and the use of different materials.  The streets and pathways benefit from passive surveillance from the dwellings and non-residential uses that front onto them. Pedestrians / cyclists are prioritised through the incorporation of a network of pathways as well as the use of shared surfaces. A connection to the greenway is also included which will increase activity through the central spine of parkland and maximise connectivity to the surrounding area.
8. Public Realm: How safe, secure and enjoyable are the public areas?	<ul> <li>All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.</li> <li>The public realm is considered as a usable integrated element in the design of the development.</li> <li>Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.</li> <li>There is a clear definition between public, semi private, and private space.</li> <li>Roads and parking areas are considered as an integral landscaped element in the design of the public realm.</li> </ul>	The proposed development is designed to balance the private and public amenity needs of the future community. The layout attempts to maximise the number of dwellings which are dual aspect, providing additional interaction between the public and private realm while also increasing the daylight into dwellings.  The open spaces and play areas has been designed to be overlooked where possible. Specific housing types are being provided to ensure that the central spine of parkland is overlooked in so far is practicable. Amenity/play areas and public streets are

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		located proximate to the housing clusters and are therefore overlooked, with visual ownership limited to the enclosing properties. These measures will increase the perceived sense of safety of those using the public realm as well as their usability.
		A clear definition is provided between public and private areas, particularly the front gardens of each dwelling. Changes in materiality and the use of landscaping within the street and the gardens themselves will mark the transition between these two zones, clearly defining the curtilage of each dwelling.
9. Adaptability: How will the buildings cope with change?	<ul> <li>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</li> <li>The homes are energy-efficient and equipped for challenges anticipated from a changing climate.</li> <li>Homes can be extended without ruining</li> </ul>	The varying house types will be designed to be adaptable should the future occupants of the dwellings require additional habitable space in the future.  The majority of dwellings will be designed to provide optional conversion of the attic space, which will increase the size of dwellings to provide flexibility for families change where
	the character of the types, layout and outdoor space.  The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annexe or small office.  Space in the roof or garage can be easily converted into living accommodation.	necessary.  Homes on larger plots will also be designed to facilitate extension if required; as the provision of surplus rear garden space would also allow for same should the owner require this in the future.
10. Privacy and Amenity: How does the scheme provide a decent standard of amenity?	<ul> <li>Each home has access to an area of useable private outdoor space.</li> <li>The design maximises the number of homes enjoying dual aspect.</li> <li>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</li> <li>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</li> </ul>	The proposed layout has been designed to ensure that each residential unit within the development will have a high standard of residential amenity and privacy. This has been achieved by carefully locating, orientating and positioning each dwelling and also by providing generous separation distances between residential units. Windows are sited to prevent overlooking into adjacent private gardens.
	The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.	Generous rear gardens will also be provided throughout the development, which meet the guidelines set out for minimum rear garden sizes and will be oriented to maximise solar exposure. Duplex units will benefit from access to a terrace or shared courtyard while apartment will have access to their own balcony. Front gardens with ample parking and landscaping, will also prevent direct views into the dwellings from the street. All homes will have adequate storage areas and areas for sorting of recyclables.
11. Parking: How will parking be secure and attractive?	<ul> <li>Appropriate car parking is on-street or within easy reach of the home's front door.</li> <li>Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.</li> <li>Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.</li> <li>Materials used for parking areas are of similar quality to the rest of the development.</li> </ul>	Each dwelling house will have two car parking spaces located within the driveway in the front garden space of the dwellings. The duplex/apartment units will also benefit from parking which is in close proximity to the front door, located in shared parking court. High quality materials will be used to define the areas of semi-private space, visually marking the transition from the public realm. Apartment blocks C and D will have parking located at under croft/basement level. All parking areas will be secure and overlooked.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<ul> <li>Adequate secure facilities are provided for bicycle storage.</li> </ul>	Adequate cycle parking will also be provided throughout the site, in line with the requirements of Appendix D of the CDP.
12. Detailed Design: How well thought through is the building and landscape design?	<ul> <li>The materials and external design make a positive contribution to the locality.</li> <li>The landscape design facilitates the use of the public spaces from the outset.</li> <li>Design of the buildings and public space will facilitate easy and regular maintenance.</li> <li>Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.</li> <li>Care has been taken over the siting of flues, vents and bin stores.</li> </ul>	The detailed design of the proposed dwellings will respond to the local vernacular, incorporating both traditional styles and elements of more contemporary development located in the surrounding area. The south Douglas/Maryborough area has been subject to a significant level of residential development in past years and this specific development context presents significant challenges to create a complementary identity to that existing, while respecting and enhancing the surrounding built environment and promoting a high quality of design.  The proposed design will reflect the form, detailing and material palette of existing buildings in a more contemporary manner whilst also respecting and enhancing the local setting. This is apparent in the proposed design of the respective character areas with each area reflecting differing elements of the existing built environment in a manner that is appropriate to the specific area of the site.  The proposed landscape design has also informed the design of the built environment, identifying landscape features in need of enhancing, utilisation and protection. For example, the stream corridors, hedgerows and woodlands areas form the framework of the design, identifying pockets of space suitable for development. The landscaping of the development will frame the units, creating a user-friendly environment with a strong and attractive landscape setting.  Similarly, with regard to hard landscaping, including the pathways and parking areas, these are treated as an integral part of the public realm. The selection of materials and planting will be durable and facilitate easy maintenance.

### 2.3 Design Manual for Urban Roads and Streets, 2013

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Integrated Street Networks	Does the development create connected centres that prioritise pedestrian movement and access to public transport?	Yes – a good quality network of footpaths, trails, cycleways have been provided on site which link each of the housing clusters and incorporate desire lines wherever the gradient allows. Strong links area also provided to the surrounding area via the greenway and the provision of a bus stop along the R609. The expanded greenway will provide direct access to the wider cycle network, which includes primarily off-road access directly to the town centre of Douglas.
Movement and Place	Does the development create a legible street hierarchy that is appropriate to its context?	Yes – the street / road hierarchy for the proposed development is as follows:

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations (i.e. community centre, shops, creche, schools etc.)?	<ul> <li>Primary access road from the proposed junction at the R609 adjacent to the school which meanders through the site to the residential pocket in the south.</li> <li>A second access point and footpath connections will be provided along the R609 and serve Blocks B, C &amp; D only.</li> <li>An access route from the existing Temple Grove residential area will be provided and will link to the primary route, through the proposed housing clusters.</li> <li>Homezones / local streets which are lower order streets providing access to specific residential areas.</li> </ul>
		Pedestrian / cycle routes are also provided which create strong permeability to public footpaths / cycleways and provide easy access towards existing built up areas, amenity spaces and play areas, as well as the proposed school and creche.
		The greenway will provide a non-vehicular access route towards the town centre in Douglas.
Permeability and Legibility	<ul> <li>Has the street layout been well considered to maximise permeability for pedestrians and cyclists?</li> <li>Are the streets legible with maximum connection opportunities?</li> <li>Are blocks of a reasonable size and permeability, with consideration to the site constraints?</li> </ul>	Yes – the layout provides for safe and permeable pedestrian / cycle routes facilitating connection within the proposed development and to external amenities.  Provision for connections to SLR 3 lands to the south of the application site have been provided.  Streets and roadways are sized to create a definitive hierarchy, each with its own specific character and
84		function.
Management	<ul> <li>Is the layout designed to self-regulate vehicle speeds and traffic congestion?</li> <li>Does the proposed layout minimise noise / air pollution wherever possible?</li> </ul>	Yes – the layout is designed to calm traffic via passive measures where possible, and to ensure low driving speeds within the development. The frequent number junction's forces drivers to slow and increase their level of caution. The inclusion of shared surfaces and raised tables will also ensure lower traffic speeds, increasing pedestrian and cyclist safety and minimising noise and air pollution. Traffic calming measures on Carr's Hill/Carrigaline Road (R609) in the form of a 'Gateway' treatment are included as part of the drawings by JB Barry.
Movement, Place and Speed	Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed?	Yes – as above the layout and proposed road finishes, are designed to regulate speed within the development.
	Does the design promote a reasonable balance of both physical and psychological measures to regulate speed?	Psychological and physical measures have been adopted in the layout to balance the functional needs of different users. Frequent crossing points, shared surfaces and junctions, horizontal deflections, tighter corner radii and shared surfaces have been adopted to reduce speeds within the proposed development. In addition, the use of landscaping measures along the proposed streets will also provide a traffic calming effect.
Streetscape	<ul> <li>Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure?</li> <li>Have street trees and areas of planting been provided where appropriate?</li> <li>Have active street edges been provided where appropriate?</li> </ul>	Yes - the proposed scheme provides a strong urban structure, with 6 main character areas. Streets and open spaces are well overlooked and landscaped to promote a sense of enclosure and provide active streetscapes.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	Is a palette of high quality surface materials and finishes provided?	The palette of materials and finishes will provide a clear demarcation between public and private spaces and emphasis pedestrian / cycling zones.
Pedestrian and Cyclist Environment	<ul> <li>Are footways of appropriate width provided so as to ensure pedestrian safety?</li> <li>Are verges provided adjacent to larger roadways so as to provide a buffer between vehicular routes and pedestrian paths?</li> <li>Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations?</li> <li>Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required?</li> <li>Have cycle facilities been factored into the design?</li> </ul>	Yes – the proposed footpaths will be designed in compliance with DMURS and in consultation with Cork County Council. All footpaths will allow for the minimum required space for two people to pass comfortably for areas of low pedestrian activity.  Where appropriate landscaped verges will also be provided to buffer between footpaths and the respective roadways.  Raised tables will be provided for pedestrian crossings where appropriate. Shared surfaces and home zones have been located on local streets to promote more liveable streets. Reduced corner radii and carriage widths promote lower speeds on the shared surfaces.
Carriageway Conditions	<ul> <li>Are vehicular carriageways sized appropriately for their function / location?</li> <li>Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions?</li> <li>Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists?</li> <li>Have adequate parking / loading areas been provided?</li> </ul>	The road/street hierarchy will be appropriately designed to cater for the function that they serve.  Changes of the surface materials will inform drivers of a change in the hierarchy and notify drivers of shared surfaces  Corner radii have been reduced at junctions in conjunction with raised speed tables to reduce speeds and address the needs of pedestrians and cyclists crossing the junctions.  Adequate levels of parking will be provided in appropriate areas to serve the respective dwelling units and creche.

### 2.4 Sustainable Urban Housing: Design Standards for New Apartments, 2018.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Apartment Floor Area & Mix	<ul> <li>Studio (1 person) 37 sqm</li> <li>1-bed (2 person) 45 sqm</li> <li>2-bed (4 person) 75 sqm</li> <li>3-bed (5 person) 90 sqm</li> </ul>	The layout provides for 238 no. duplex and apartment units in a range of 1, 2 and 3 bed configurations.
	<ul> <li>No more than 40% of total number of units in any private residential development may comprise 2-bed (3 person) units.</li> <li>The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2, or 3-bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%). Build to rent developments are excepted from this requirement as they are required to provide compensatory communal facilities.</li> </ul>	All unit types exceed the minimum floor areas as detailed in the Apartment Guidelines and the number of 2 bed apartments does not exceed 40%, with 2 bed apartments accounting for 26% of the overall number of units on the site.
Dual Aspect Ratio	<ul> <li>Minimum 50% dual aspect apartments in urban locations.</li> <li>This may be reduced to a minimum 33% in certain circumstances where it is necessary to ensure good street frontage and subject to high quality design, usually on inner urban sites, near to city or town centres, including SDZ areas.</li> </ul>	All duplex/apartments are dual aspect with front defensible spaces and private terraces/gardens to the rear.  Within the specific apartment building to the west of the site, the majority of the 145 no. apartments will be dual aspect, with those that

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<ul> <li>At least 33% of units should be dual aspect in more central, accessible and some intermediate locations (i.e. near city or town centres). Planning authorities may exercise discretion for a lower percentage on urban infill sites up to 0.25ha, subject to overall high-quality design in other aspects.</li> <li>In suburban or intermediate locations, it is an objective that a minimum of 50% of apartments will be dual aspect.</li> <li>Ideally any 3 bedroom apartments should be dual aspect.</li> <li>Where single aspect units are provided, the number of south facing units should be maximised, with west or east facing single aspect also being acceptable. North facing units may be considered where overlooking a significant amenity, such as a public park, garden or formal space or water body.</li> </ul>	are not generally facing in an east, west or south direction.
Floor to Ceiling Height	Ground level apartment floor to ceiling heights shall be a minimum of 2.7 m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.	Floor to ceiling heights will be in excess of 2.7m.
Lift / Stair Cores	A maximum of 12 apartments per floor may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25 ha, subject to overall design quality and compliance with building regulations.	The maximum number of apartments served off a shared stair core in the dedicated apartment buildings is 7 (Block B).
Internal Storage	Minimum Storage requirements:  Studio 3 sqm  1-bed 3 sqm  2-bed (3 person) 5 sqm  2-bed (4 person) 6 sqm  3+ bed (5+ person) 9 sqm  Secure storage can be provided outside individual units, and this may be used to satisfy up to half of the minimum storage requirement for individual apartment units.	Each apartment has been provided with storage separate to the kitchen and bedroom furniture.  Secure storage will also be provided at basement level where possible.
Private Amenity Space	Private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels.  Studio 4 sqm 1-bed 5 sqm 2-bed (3 person) 6 sqm 2-bed (4 person) 7 sqm 3+ bed (5+ person) 9 sqm  Minimum depth of 1.5m is required for balconies, primarily accessed from living room. Standards may be relaxed for refurbishment schemes, or on urban infill sites of up to 0.25 ha, subject to overall design quality.	Each apartment/duplex is provided with amenity space that is at least the minimum requirement.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Security Considerations	Apartment developments should provide residents and visitors with a sense of safety, by maximising natural surveillance of streets, open spaces, play areas and any surface bicycle or car parking. Accordingly, blocks and buildings should overlook the public realm. Entrance points should be clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external communal areas.	All duplex / apartment blocks overlook the surrounding streets and public realm.  Entrance points are obvious and overlooked by the neighbouring duplex apartment.  All ground floor windows have defensible spaces in front.
Access and Services	Apartment schemes to be capable of meeting the changing needs of occupants through compliance with Part M of the building regulations	All apartment designs comply with the requirements of Part M of the Building Regulations and principles of Universal Design.
Communal Rooms	Communal rooms may be provided in apartment schemes, including meeting rooms, management/maintenance offices. Or communal laundries.	No communal rooms are proposed within the apartment schemes.
Childcare	Threshold for provision of childcare facilities in apartment schemes should be established having regard to the scale and unit mix; existing childcare facilities and demographic profile of the area. One-bedroom or studio units should not generally be considered to contribute to requirement for any childcare provision and subject to location, this may also apply in part, or whole to units with two or more bedrooms.	A 75 place creche has been provided on site to service the entire development. This creche is located centrally, along the main access route into the site, and is accessible both by car and for pedestrians/cyclists.
Refuse Storage	Provision shall be made for the appropriate storage and collection of waste materials in apartment schemes. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage.  The following general design considerations should be taken into account:  Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste;  In larger apartment schemes, consideration should also be given to the provision of separate collection facilities for other recyclables such as glass and plastics;  Waste storage areas must be adequately ventilated so as to minimise odours and potential nuisance from vermin/flies;  Provision in the layout for sufficient access for waste collectors, proximity of, or ease of access to, waste storage areas from individual apartments, including access by disabled people;  Waste storage areas should not present any safety risks to users and should be well-lit;  Waste storage areas should not be on the public street, and should not be visible to or accessible by the general public.  Waste storage areas in basement car parks should be avoided where possible, but where provided, must ensure adequate manoeuvring space for collection vehicles;	Where a rear access is not provided, all apartments will have access to a shared yard for the storage of bins and/or recyclables.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	The capacity for washing down waste storage areas, with wastewater discharging to the sewer.	
Communal Amenity Facilities	The provision and proper future maintenance of well-designed communal amenity space is critical in meeting the amenity needs of residents. The design must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight.	No communal amenity space is proposed for the apartment / duplex units. Private space is provided for all units, plus easy access and overlooking to public open space within the development.
Children's Play	Recreational needs of children must be considered as part of communal amenity space within apartment schemes. Children's play needs should be catered for:  - Within the private open space associated with individual apartments;  - Within small play spaces (c.85-100 sqm) for children up to age of 6 in a scheme that includes 25 or more units with 2 or more bedrooms.  - Within play areas (200- 400 sqm)	The apartment / duplex units have private open space and good access to the proposed play areas and public open space within the development.
Car Parking	Section 4.14 states that the quantum of car parking provision for residential developments generally is a matter for individual planning authorities having regard to local circumstances (notably location and access to public transport).  Draft December Guidelines state that planning authorities may consider reduced parking in suburban / urban locations well served by public transport and must apply a maximum car parking standard.  Where reduced parking is provided, a limited number of drop-off, service and visitor parking spaces should be provided, as well as alternatives, such as car sharing, cycle parking	A breakdown of the number of parking spaces per duplex/apartment units is provided in the Schedule of Areas prepared by Meitheal.  A total of 286 parking spaces are provided for the apartments. This has been calculated using varying rates as follows and set out in the Schedule of Areas:  Apartment Block A – 1.06 spaces provided per unit = 44 total  Apartment Block B/C/D – 1.07 spaces provided per unit = 105 total  Block E – 1.3 spaces provided per unit = 39  Block F – 1.13 spaces provided per unit = 26
Bicycle Parking	Section 4.18 states that bicycle parking provision for residential developments generally is a matter for individual planning authorities.  Where provided, bicycle parking spaces should be conveniently accessible to residents, both in terms of proximity to access points i.e. stair/lift cores to apartments and routes to the external road/ street network.	Adequate level of cycle spaces will be provided per unit in the duplex / apartment units, as per the requirements of Appendix D of the CDP.  1 stand has been provided per apartment and 1 stand per 2 apartments for visitors. A breakdown of the number of cycle spaces per apartment is set out below.  80 cycle spaces have been provided to north of Vicarage Apartments.  32 cycle spaces have been provided to the east of Block E in Western Woodland Character Area.  24 cycle spaces are provided to east of Block F in Parkland Character Area.  30 cycle spaces are provided to east of Blocks G & H in Parkland Character Area.  150 cycle spaces are provided at basement level for the Carr's Hill Apartment Blocks B, C & D
Childcare	Draft December guidelines state that one- bedroom and studio apartments should not generally be considered for calculating childcare provision requirements.	The number of 1-bedroom units within the development have a minimal impact on the requirement for childcare provision. The

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		proposed creche provides for c. 75 childcare spaces, which is greater than the recommendations of the Childcare Guidelines.

### 2.5 The Planning System and Flood Risk Management, 2009

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 5 Flooding & Development Management	Sequential approach should be applied to avoid development in areas at risk of flooding.	Yes – the majority of the site is identified as not being at risk of flooding, with a small portion of the site located within Flood Zone A. No development is located within a flood risk zone.
	Where appropriate a detailed flood risk assessment is to accompany planning applications.	Yes – A Flood Risk Assessment has been prepared to accompany the planning application.
	Development in flood risk areas should be subject to the Justification test.	Noted – as above, the Flood Risk Assessment identifies that no development is located within flood risk areas.

### 2.6 Childcare Facilities Guidelines, 2001

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 3  Development Control & Related Standards	In new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate. This is a guideline standard and will depend on the particular circumstances of each individual site.	The proposed creche provides for c. 75 childcare spaces and is to be provided within the first phase of the development.  The Childcare Guidelines suggest a provision of 20 spaces per 75 units, which equates to a requirement of 125.86 spaces for the proposed development. While the proposed creche does not meet this suggested requirement, it is more than sufficient based on detailed analysis of the demographical profile of the area and the preliminary findings of an assessment of childcare facilities in the surrounding area.
Appendix 1 General Standards	Standards related to minimum floor space, facilities and design of childcare facilities should follow the guidelines set out in appendix 1 of the Childcare Facilities Guidelines.	The creche has been designed in accordance with the guidelines set out in Appendix 1 of the Childcare Facilities Guidelines.

# 3 Local Planning Policy

### 3.1 Cork County Council Development Plan 2014

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Chapter 1 Core Strategy	CS 3-1: Network of Settlements: Higher Order Settlements Gateway, Hub and Main Settlements Strategic Aim of City Environs Growth in population and employment so that the Cork Gateway can compete effectively for investment and jobs. Develop to complement & consolidate the development of the city as a whole and providing enhanced potential to rebalance the City through new development in the north.	The proposed development supports the strategic aim of the City Environs (North and South) in that it will facilitate growth within the Cork Gateway Region which will in turn provide a critical mass of population to support additional jobs and economic growth.
	CS 4-1: County Metropolitan Cork Strategic Planning Area	The proposed development is located within land that has been identified specifically for residential development in the Ballincollig-Carrigaline MD

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	g) Develop the Cork City Environs so that they complement the City as a whole. In the south, priority should be given to consolidating the rapid growth that has occurred in recent years by the provision of services, social infrastructure and recreation facilities to meet the needs of the population. The North Environs will play a major role in the rebalancing of the City in terms of future population and employment growth;	LAP which will help to consolidate growth within the boundary of the city environs. Important facilities are also provided as part of the development including a large park and extension to the greenway.
Chapter 3 Housing	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.	The proposed development has had full regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual (as outlined in Section 2.2 of this report.
	b) 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.	sustainable methods of transport including walking and cycling, with permeability facilitated within the development itself as well as connectivity to surrounding built-up areas, despite the site's challenging topography. Pedestrian and vehicular access is provided to the Vicarage and Temple Grove estates, with primary access provided to the R609. This
	c) Following the approach in chapter 10 of this plan, ensure that urban footpaths and public lighting are provided connecting all residential developments to the existing network of footpaths in an area and that the works required to give effect to this objective are identified early in the planning process to ensure such infrastructure is delivered in tandem with the occupation.	All existing footpaths and public lighting services are connected within the proposed development where practicable. This is most relevant at the connection points with the Vicarage and Temple Grove but also to the footpaths along the R609.
	a) Ensure that all new urban development is of a high design quality and supports the achievement of successful urban spaces and sustainable communities. The Council will have regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas, the accompanying Urban Design Manual and the Council's Design Guide for Residential Estate Development in development plan preparation and in assessing applications for development through the development management process.	The proposed development has had full regard to the provisions of the Guidelines on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual (as outlined in Section 2.2 of this report). Specific guidance issued by the Council is based on these principle documents and therefore the proposed development is in accordance with the Council's Design Guide for Residential Estate Development.
	Require the submission of design statements with all applications for residential development in order to facilitate the proper evaluation of the proposal relative to key objectives of the	A Design Statement will be submitted as part of the planning application documents.  MH Planning have also prepared a Planning and Design Summary Report which summarises the

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	Development Plan with regard to the creation of sustainable residential communities.	overall design approach to the site. See also the Design Statements by Meitheal and AECOM submitted in support of this SHD application.
	d) Require developers to take account of the Design Manual for Urban Roads and Streets (DMURS).	The guidance contained in DMURS has been considered and incorporated into the proposed development (Please see Section 2.3 of this report). Further consideration will be given to DMURS as the design progresses.
	<ul> <li>HOU 3-3: Housing Mix</li> <li>a) Secure the development of a mix of house types and sizes throughout the County as a whole to meet the needs of the likely future population in accordance with the guidance set out in the Joint Housing Strategy and the Guidelines on Sustainable Residential Development in Urban Areas.</li> </ul>	A mix of dwelling types and sizes has been provided within the proposed development.
	b) Require the submission of a Statement of Housing Mix with all applications for multi-unit residential development in order to facilitate the proper evaluation of the proposal relative to this objective.	A Statement of Housing Mix will be provided as part of the planning application documents.
	HOU 4-1: Housing Density on Zoned Land High Density (min. 35 – max. no limit, units per Ha)  Applicable in town centres throughout the	The SE-R-06 zoning objective requires development which is within the thresholds outlined for Medium A Density development.
	county and in other areas identified in LAP's normally in close proximity to existing or proposed high quality public transport corridors.  Normally requires/involves apartment development.  Subject to compliance with appropriate	Given the topography and existing site constraints, the proposed density of the site has been calculated by omitting these 'undevelopable areas' from the overall gross site area to give the net developable area.
	design/amenity standards and protecting the residential amenity of adjoining property and the heritage assets of town centres.	The site has a total gross area of 21.90 hectares with a net developable area of 13.29 hectares and a net density of 35.52 units per hectare.
	Medium A Density (min. 20 – max. 50, units per Ha)  ■ Applicable in city suburbs, larger towns over 5,000 population and rail corridor locations (example Carrigtwohill).	The net density is 35.52 units/ha which is within both the ranges outlined for Medium A density development in the Cork County Development Plan 2014, and is in accordance with the relevant
	<ul> <li>Apartment development is permissible where appropriate but there is no requirement to include an apartment element in development proposals.</li> <li>Consider a lower standard of public open space provision where larger private gardens are provided.</li> <li>Must connect to public water and waste-water services.</li> </ul>	DoEHLG Guidelines. The site is divided into six character areas as illustrated in Meitheal's Design Statement. A breakdown of each of the character areas and their development area proposed number of units and net density is se out in Table 1 of this Statement of Consistency.
	<ul> <li>Broad housing mix normally required including detached/serviced sites unless otherwise specified in relevant Local Area Plan.</li> </ul>	
	Table 3.1: Settlement Density Guide The following densities are applicable in 'Towns Within Public Transport Corridor Potential', including the South Environs:	The density of the proposed development is consistent with the SE-R-06 zoning and Medium A Density objectives for the site.
	High Density: Applicable in locations close to future high quality public transport proposals	
	Medium A Density: Generally applicable for future development	

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<b>Medium B Density:</b> Applicable in a limited number of peripheral locations identified in the Local Area Plan	
	HOU 4-1: Reserved Land for Social Housing Lands zoned for residential / housing or lands zoned for a mixture of residential / housing and other uses, including all land for a settlement identified in a local area plan will require 14% of all new residential developments to be made available for social housing in accordance with	This requirement is superseded by the requirements of the amended Planning and Development Regulations (2015), pursuant to Part V, s.96 of the Planning and Development Act 2000 (as amended), which requires a provision of 10% social housing.
	the principles, policies and programmes for action set out in the Joint Housing Strategy.	It is proposed to transfer 47 no. units to meet this Part V obligation. The manner in which the applicant proposes to do so is outlined in Section 1.2.11 of this report.
Chapter 5 Social & Community	SC 3-1: Childcare Facilities Support and facilitate the sustainable provision of childcare facilities in appropriate locations and seek their provision concurrent with development, having regard to population targets for the area and in accordance with the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006.	The proposed development includes a creche in line with the requirements of the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006. Section 1.2.12 of the report outlines the scope of this provision.
	a) Public Open Space within Residential Development shall be provided in accordance with the standards contained in "Cork County Council Recreation & Amenity Policy", the "Guidelines on Sustainable Residential Development in Urban Areas" and "Making Places: a design guide for residential estate development. Cork County Council Planning Guidance and Standards Series Number 2".	The provision of public open space is consistent with the relevant planning policy documents, as outlined in Section 1.2.4 of the report.  A range of features are provided on site in order to achieve in excess of the recreation and amenity points provision for the site. These are spread throughout the site, linked by the network of footpaths and amenity trails, and cater towards varying age groups and abilities. This approach is consistent with this objective.
	b) Promote the provision of high quality, accessible and suitably proportioned areas of public open space and promote linking of new open spaces with existing spaces to form a green infrastructure network. See also Chapter 13 Green Infrastructure and Environment.	As above.  The proposed linear parkland will also be linked to existing greenspaces and amenity walks/cycle ways via the proposed greenway extension through the site which will facilitate the expansion of the green infrastructure network in the South Environs.
	SC 5-3: Provision of New Recreation and Amenity Facilities  Ensure the protection and seek the enhancement and wise management of existing recreational facilities and public open space, and ensure that all new developments make adequate provision for recreational and amenity facilities in accordance with the requirements of the Councils Recreation and Amenity Policy and having regard to the Councils policy regarding the management of Green Infrastructure assets. It is also intended that any enhancement and management of existing public open spaces and new developments will be in accordance with the Council's policy on Biodiversity outside Protected Areas (HE 2-3), the Council's Green Infrastructure Strategy for County Cork (GI 2-1)	The proposed development has provided for adequate recreation and amenity facilities to serve both the future population and existing communities. A wide variety of play areas and facilities are provided throughout the development which are catered to differing age groups. These facilities and spaces are connected via a network of paths and amenity trails. MUGA's and informal kickabout areas are also provided within the development.  An extension of the greenway is also provided through the proposed central parkland which provides a valuable amenity facility while also increasing connectivity to other open spaces, walks and cycleways in the area.

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	SC 5-8: Private Open Space Provision Apply the standards for private open space provision contained in the Guidelines on Sustainable Residential Development in Urban Areas and the Urban Design Manual (DoEHLG 2009) and Cork County Council's Design Guidelines for Residential Estate Development. With regard to apartment developments, the guidelines on Sustainable Urban Housing: Design Standards for New Apartments will apply.	The private open space provided for each dwelling unit is in line with the standards contained in the relevant guidance documents for both houses and apartments. Each dwelling house is provided with both a front and rear garden. The front garden serves as a transitional space between the public street and the private realm and also provides parking for each unit. The rear garden is truly private space, serving each individual dwelling.
		The apartment/duplexes are also provided with their own private balconies or terraces where relevant.
Chapter 10 Transport & Mobility	TM 2-1: Walking  a) Encourage and facilitate a safe walking route network and a culture of walking where possible and practical.	A network of interconnected footpaths and amenity trails have been provided throughout the development which will improve connectivity and encourage walking through the development itself and within the surrounding area. These footpaths are overlooked by the dwellings, providing for an improved perception of safety throughout the development.
		The facilitation of the expansion of the greenway through the site, providing a direct pedestrian connection to Douglas Village and across the South Environs will also encourage walking as an optional mode of transport to local schools and work places, while also promoting walking as a recreational activity.
	b) Preserve, protect and where possible enhance existing walking routes particularly those providing access to key transport and community infrastructure such as bus stops, rail stations, schools, shops, work places, town and village centres.	As above, the extension of the existing greenway through the proposed linear parkland will enhance the existing walk/cycle routes in the area, providing for enhanced connectivity to existing surrounding residential estates as well as Douglas town centre. It also enhances the potential to extend the greenway further east to connect to the Ballybrack walk/cycle trail which would enhance connectivity to the Maryborough area.
	c) Ensure that all development should be accessible and permeable on foot and that the walking experience should be as safe and pleasant as possible and set within an overall coherent network. The Design Manual for Urban Roads & Streets (DMURS) is a useful guidance tool.	While the topography of the site acts as a constraint to accessibility in many areas, significant effort has been made to ensure that the development is universally accessible to all members of the community, regardless of age or ability.
		The provision of both on street and off-road footpaths and pathways ensures that a range of connections are available to people, including for recreational use. Legibility is improved throughout the site by setting these pathways within a distinct hierarchy of streets and open spaces.
	TM 2-2: Cycling  a) Encourage and facilitate a safe walking and cycling route network and a culture of walking and particularly cycling in the county, as a viable alternative travel choice. Local Area Plans will set out Active Travel Strategies (cycling and walking) for individual towns and their hinterlands.	As above the proposed development places an emphasis on walking and cycling as a more appropriate mode of transport. Where appropriate, shared pathways have been introduced to ensure that every area of the development is accessible on bike. The proposed controlled junction onto the R609 will also provide facilities for cyclists ensuring safe access onto the wider public road network.

Reference	Re	levant Policy / Principle / Guideline	Statement of Consistency
	b)	Improve the streetscape environment for pedestrians, cyclists and those with special mobility needs while seeking to provide facilities which enhance safety and convenience. The Design Manual for Urban Roads & Streets (DMURS) is a useful guidance tool.	The streetscape of the proposed development will ensure that the needs of pedestrians, cyclists and those with special mobility needs are met appropriately and in so far as is practicable, in line with the guidance of DMURS.
	c)	Ensure that development in urban areas, towns and villages is well located, permeable and prioritises walking, cycling and access to public transport and other important amenities. The Design Manual for Urban Roads & Streets (DMURS) is a useful guidance tool.	The proposed development is well connected to the surrounding area, particularly through the Vicarage and Temple Grove. Connectivity is also provided to the proposed creche and primary school. Via the new entrance onto the R609, access will also be provided to the bus stop which is proposed as part of the school application.
	d)	Promote the development of an integrated and coherent local and countywide cycle network to form part of the wider National Cycle Network. Routes will be promoted which generally seek to avoid or minimise impacts on the environment and on EU designated sites.	The extension of the greenway network through the site is in line with the objective for same outlined in the Douglas Land Use and Transportation Strategy.
	TM a)	3-3: Road Safety and Traffic Management Where traffic movements associated with a development proposal will have a material impact on the safety and free flow of traffic on a National, Regional or other Local Routes, to require the submission of a Traffic and Transport Assessment (TTA) and Road Safety Audit as part of the proposal.	A TTA is submitted as part of the formal SHD application documentation.
	b)	Support demand management measures to reduce car travel and promote best practice mobility management and travel planning via sustainable transport modes.	The proposed development has been designed to maximise connectivity with the surrounding area where possible while also providing access to sustainable transport modes. For example improved bus stop facilities will be provided along the R609 roadway at the main access to the proposed development.
	c)	For developments of 50 employees or more, developers will be required to prepare mobility management plans (travel plans), to promote alternative sustainable modes or practices of transport as part of the proposal.	n/a
	d)	Ensure that all new vehicular accesses are designed to appropriate standards of visibility to ensure the safety of other road users.	All new vehicular access points will be designed to appropriate standards of visibility to ensure the safety of other road users. Where applicable, a Road Safety Audit will be carried out to confirm the safety of same.
	e)	Improve the standards and safety of public roads and to protect the investment of public resources in the provision, improvement and maintenance of the public road network.	The proposed public roadways will be designed to the highest standard.
	f)	Promote road safety measures throughout the County, including traffic calming, road signage and parking.	Adequate traffic calming, road signage and parking will be provided in line with the recommendations of Cork County Council and best practice guidance. Where practicable, passive measures such as the incorporation of home zones have been included rather than more physical interventions such as speed bumps etc.
	g)	Co-ordinate proposed zoning designations and/or access strategies in settlement plans with speed limits on national roads.	n/a

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	<ul> <li>TM 4-1: Car and Cycle Parking         <ul> <li>a) Encourage a gradual shift towards more efficient and sustainable transport modes by securing the delivery of parking spaces required in connection with new</li> </ul> </li> <li>b) Ensure that on-street car parking is designed such that it does not occupy unnecessary street frontage.</li> </ul>	Cycle parking will be provided in accordance with the requirements set out in Appendix D. These parking areas will be provided at appropriate locations, i.e. at creche, apartment buildings etc  Residential parking is provided within the curtilage of each dwelling while designated parking areas are provided to each of the non-
	c) Improve the overall connectivity and	residential areas. There is no on-street parking provided.  Parking is provided adjacent/in close proximity to
	accessibility between key car parking areas and primary town centre streets.  d) Ensure that a high standard of design,	main areas of activity including the proposed creche.
	d) Ensure that a high standard of design, layout and landscaping accompanies any proposal for surface car parking. Planning permission will be granted only where all the following criteria are met:  i. Respects the character of the streetscape/landscape  ii. Will not adversely affect visual amenity, and  iii. Provision has been made for security, and the direct and safe access and movement of pedestrians and cyclists within the site.	Any parking areas provided are located in areas which benefit from passive surveillance and will be landscaped so as to enhance the environment and be respectful of the streetscape. Parking areas will provide for safe and easy access for pedestrians and cyclists.
	e) Promote a shift towards cycling as a viable transport mode by requiring the provision of cycle parking facilities in accordance with Appendix D Table 2.	Cycle parking will be provided in accordance with the requirements set out in Appendix D. These parking areas will be provided at appropriate locations, i.e. at creche, apartment buildings etc.
Chapter 11 Water Services, Surface Water and Waste	<ul> <li>WS 3-1: Wastewater Disposal</li> <li>b) Require that development in all main settlements connect to public waste water treatment facilities subject to sufficient capacity being available which does not interfere with Council's ability to meet the requirements of the Water Framework Directive and the Habitats Directive. In settlements where no public waste water system is either available or proposed, or where design, capacity or licensing issues have been identified in existing plants, new developments will be unable to proceed until adequate</li> </ul>	The proposed development will connect to the existing public waste water treatment system in the area. This has been discussed with Irish Water who have confirmed that subject to a valid connection agreement being put in place, the proposed connection to the Irish Water network can be facilitated pending the undertaking of upgrade works to the waste water network. The applicant is currently engaged in a Project Works Services Agreement with Irish Water to ensure the surveying of the existing system to identify said upgrades.
	ws 5-1: Surface Water and SuDS  a) Ensure that all new developments incorporate sustainable drainage systems (SuDS).	The proposed storm water drainage system will be designed using appropriate SuDS principles to suit the location and topography of the site.
	b) Provide adequate storm water infrastructure in order to accommodate the planned levels of growth expected for the County.	Storm water infrastructure will be appropriate for the site. It is proposed that surface water discharge from roofs, roadways and hard paved areas will be collected within the site in a separate gravity sewer network. Rainwater from grassed or landscaped areas or on woodlands will percolate to ground or to existing watercourses. Hydrocarbon interceptors and silt traps will be installed on the outfall pipework to remove oils and hydrocarbons from the flows prior to discharging into the receiving streams.
	WS 5-2: River Channel Protection Ensure that where practical development is kept at 10m or other appropriate distance from stream and river banks and adequate protection measures put in place.	The Douglas and Moneygurney Streams run through the site, both of which will be retained in situ to provide an ecological corridor and landscape feature. All development will be located a sufficient distance away from the water

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
		course, generally greater then 10m where appropriate. The stream will be protected during construction and during operation it will be generally screened along its length to prevent general access.
	WS 5-3: Surface Water Management Manage surface water catchments and the use and development of lands adjoining streams, watercourses and rivers in such a way as to minimise damage to property by instances of flooding and with regard to any conservation objectives of European sites within the relevant catchments and floodplains.	As above, surface water will be managed appropriately on site.
	WS 6-2: Development in Flood Risk Areas Ensure that all proposals for development falling within flood zones 'A' or 'B' are consistent with the Ministerial Guidelines – 'The Planning System and Flood Risk Management. In order to achieve this, proposals for development identified as being at risk from flooding will need to be supported by a site-specific flood risk assessment prepared in line with Paragraph 11.6.16 of this plan.	The proposed development takes accordance of the findings and recommendations of the site-specific Flood Risk Assessment, submitted as part of this SHD application.
	Where the planning authority is satisfied that it can be satisfactorily shown in the site-specific flood risk assessment required under objective WS 6-1 that the proposed development, and its infrastructure, will avoid significant risks of flooding in line with the principles set out in the Ministerial Guidelines, then, subject to other relevant proper planning considerations, permission may be granted for the development.	
	Where the site specific flood risk assessment required under WS 6-1 shows that there are significant residual flood risks to the proposed development or its occupiers, conflicting with the approach recommended in the Ministerial Guidelines, it is an objective of this plan to, normally, avoid development vulnerable to flooding unless all of the following are satisfied:  The development is within an urban settlement, targeted for growth under the National Spatial Strategy, Regional Planning Guidelines, and statutory plans.  The development of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
	<ul> <li>Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;</li> <li>Comprises significant previously developed and/or under-utilised lands;</li> <li>Is within or adjoining the core of an established or designated urban settlement;</li> <li>Will be essential in achieving compact and sustainable urban growth; and</li> <li>There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</li> </ul>	

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	The development is assessed not to have the potential to give rise to negative or adverse impacts on the integrity of Natura 2000 sites.	
	<ul> <li>WS 7-1: Waste Management</li> <li>c) Normally require details and formal development proposals of onsite provisions for the management of waste materials that are likely to be generated from the proposed use. The Council will require Waste Management Assessment for projects which exceed thresholds outlined.</li> </ul>	A Construction and Environmental Management Plan (CEMP) is submitted in support of the planning application (as an appendix to the EIAR). Any waste generated by the proposed development will be managed in accordance with best practice.
Chapter 12 Heritage	HE 2-3: Biodiversity outside Protected Areas Retain areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network, and to protect these from inappropriate development. This includes rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands as well as coastal and marine habitats. It particularly includes habitats of special conservation significance in Cork as listed in Volume 2 Chapter 3 Nature Conservation Areas of the plan.	The existing woodland areas, hedgerows and stream corridors will be retained in situ as part of the proposed development. This will enhance the biodiversity value of the proposed development as well as providing interesting natural landscape features within the built environment. These will be protected appropriately during construction and operation.
	<ul> <li>HE 2-5: Trees and Woodlands</li> <li>a) Protect trees the subject of Tree Preservation Orders.</li> </ul>	The trees to the west of the site are protected by a Tree Protection Order. These will be retained as part of the proposed development and protected during both construction and operation.
	b) Preserve and enhance the general level of tree cover in both town and country. Ensure that development proposals do not compromise important trees and include an appropriate level of new tree planting and where appropriate to make use of tree preservation orders to protect important trees or groups of trees which may be at risk or any tree(s) that warrants an order given its important amenity or historic value.	As above, the existing woodland and hedgerows on site are retained and protected, in recognition of their importance to the landscape framework of the development. Proposed landscape measures will enhance tree cover throughout the site where appropriate.
	c) Where appropriate, to protect mature trees/groups of mature trees and mature hedgerows that are not formally protected under Tree Preservation Orders.	As above, existing trees and hedgerows are incorporated into the design of the proposed development as far as practicable.
	HE 4-6: Design and Landscaping of New Buildings  a) Encourage new buildings that respect the character, pattern and tradition of existing places, materials and built forms and that fit appropriately into the landscape.	The proposed design of the dwellings, apartments and creche are based on a modern interpretation of traditional buildings forms and materials, as well as existing patterns of development in the area. These have been expressed in a contemporary way which respects the character of and is complimentary to the existing built environment.
	b) Promote sustainable approaches to housing development by encouraging new building projects to be energy efficient in their design and layout.	The proposed development incorporates passive sustainable design measures, maximising orientation, shelter and solar gain. It will also incorporate active measures in line with the requirements of Technical Guidance Document L of the Building Regulations.
	c) Foster an innovative approach to design that acknowledges the diversity of suitable design solutions in most cases, safeguards the potential for exceptional innovative design in appropriate locations and	Owing to the topography of the development innovative approaches have been utilised by the design team to navigate the varying gradients throughout the site. Split level dwellings have been used to avoid the amount of cut and fill

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
	promotes the added economic, amenity and environmental value of good design.	across the site. This will enable the protection of the sloped landscaped character of the site for which the Maryborough/Castletreasure area is noted for.
	d) Require the appropriate landscaping and screen planting of proposed developments by using predominantly indigenous/local species and groupings and protecting existing hedgerows in rural areas.	A landscape masterplan is submitted in support of the SHD planning application in order to provide appropriate landscaping and screen planting.
	HE 5-2: Naming of New Developments Promote and preserve local place names, local heritage, and the Irish language by ensuring the use of local place names or geographical or cultural names which reflect the history and landscape of their setting in the naming of new residential and other developments. Such an approach will be a requirement of planning permissions for new developments.	It is envisaged that each neighbourhood cluster will be named individually in order to aid legibility through the site. These names will be reflective of the local heritage of the area and will be agreed with Cork County Council through compliance.
Chapter 13 Green Infrastructure and Environment	GI 3-1: Green Infrastructure – New Developments Require new developments to contribute to the protection, management and enhancement of the existing green infrastructure of the County and the delivery of new green infrastructure, where appropriate.	The most significant elements of green infrastructure on site are the existing area of woodland which adjoins the western boundary, the respective stream corridors and network of established hedgerows. These areas will protected both during construction and operations, as well as supplemented with additional tree planting where relevant. This will ensure the preservation and enhancement of the existing habitats on site and will be managed in a sustainable way.
	<ul> <li>GI 6-1: Landscape</li> <li>a) Protect the visual and scenic amenities of County Cork's built and natural environment.</li> <li>b) Landscape issues will be an important factor in all land-use proposals, ensuring that a pro-active view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability.</li> <li>c) Ensure that new development meets high standards of siting and design.</li> <li>d) Protect skylines and ridgelines from development.</li> <li>e) Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.</li> </ul>	The proposed development has been designed to minimise any adverse impact on the visual and scenic amenities of the local environment This has been achieved through considered design and siting, the incorporation of appropriate landscaping and the protection of existing landscape features including woodland, hedgerows, and heritage features.
	GI 7-1: General Views and Prospects Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.  GI 7-4: Development on Approached to Towns and Villages Ensure that the approach roads to towns and villages are protected from inappropriate development, which would detract from the setting and historic character of these settlements.	The visual impact of the proposed development will be assessed as part of the Landscape and Visual Impact Assessment contained in the EIAR. Where any significant impacts are identified, mitigation measures will be employed to minimise the impact where relevant and as far as practicable.
		The development of the subject site for residential development is in accordance with the site-specific zoning objective and will be in keeping with the surrounding land uses. Appropriate assessments including landscape and visual impact will be carried out to ensure that the impact of same is measured and appropriate mitigation measures are proposed so as not to detract from the setting of the area.

Reference	Relevant Policy / Principle / Gu	uideline	Statement of Consistency
Chapter 14 Development and Land Use Zoning	ZU 2-1: Development and Land Use Ensure that development, during the this plan, proceeds in accordance w general land use objectives set out i and any specific zoning objectives the particular areas as set out in any rel Area Plans and Special Local Area	e lifetime of ith the n this plan nat apply to evant Local	The proposed development is in full accordance with the general land use objectives of the CDP and the specific SE-R-06 residential objective under which the subject site is designated.
	ZU 2-2: Development Boundaries For any settlement, it is a general of locate new development within the oboundary, identified in the relevant L Plan that defines the extent to which settlement may grow during the lifet plan.	development Local Area In the	The proposed development is located within the defined development boundary of the South Environs, which will support the sustainable expansion of the southern suburbs and protect the surrounding strategic metropolitan greenbelt.
	ZU 3-1: Existing Built Up Areas Normally encourage through the Loc Plan's development that supports in primary land use of the surrounding up area. Development that does not threatens the vitality or integrity of, t use of these existing built up areas resisted.	general the existing built support, or he primary will be	Proposed development located within the existing built up area is in keeping with the surrounding land uses which are primarily residential.
	<ul> <li>ZU 3-2: Appropriate Uses in Residential Areas</li> <li>a) Promote development mainly for housing, associated open space, community uses and, only where an acceptable standard of amenity can be maintained, a limited range of other uses that support the overall residential function of the area.</li> <li>b) Normally discourage the expansion or intensification of existing uses that are incompatible with residential amenity.</li> </ul>		The non-residential uses provided on site are in accordance with the requirements of the site-specific objective SE-R-06 as well as the relevant national guidance (i.e. the provision of a creche). These uses are complimentary to the primarily residential nature of the site. The play areas, linear park, amenity trails, MUGA's, and other open space areas also support the future community of the development.
Appendix B	Table B.8: Housing Require Ballincollig Carrigaline Municipal I		The proposed development will provide 472 additional housing units in the South Environs
Core Strategy Tables	Population of South Environs in 2011	32,635	which will support the sustainable expansion of the settlement and the achievement of the targets set out in Appendix B.
	Population Target for 2022	31,308	
	Total New Households 2011 – 2022	1,336	
	New Units Required 2011 – 2022	1,284	
Appendix D	Table 1a: Car Parking Requirements for New Development (Maximum per sqm)		Car parking is provided in accordance with the requirements of Appendix D.
Parking and Cycling Standards	Residential	2 spaces per dwelling 1.25 spaces per apartment	2 spaces will be provided per dwelling (i.e. 234 no. houses) equating to 468 spaces plus an additional 9 visitor parking spaces.  While there are 238 no. apartments/duplexes
	Creches	1 space per 3 staff + 1 space per 10 children	provided, a total of 286 parking spaces are provided which is slightly below the <a href="maximum">maximum</a> requirement of 297 spaces. This has been calculated using varying rates as follows and set out in the attached Schedule of Areas:  Apartment Block A – 1.06 spaces provided per unit = 44 total  Apartment Block B/C/D – 1.07 spaces provided per unit = 105 total  Block E – 1.3 spaces provided per unit = 39 total  Block F – 1.13 spaces provided per unit = 26 total

Reference	Relevant Policy / Principle / Gu	uideline	Statement of Consistency
			■ Block G & H – 1.8 spaces provided per unit = 72 total  This takes into account the varied mix of apartment sizes provided as well as the pedestrian/cyclist connectivity to the existing greenway network and location of the adjacent bus stop.
			11 spaces will be provided for the creche.  A total of 774 parking spaces will be provided in total on the application site.
	Table 2 - Cycle Parking Requirement (Minimum per sqm)	ents for New	Cycle parking will be provided in accordance with the requirements of Appendix D.
	Residential	0.5 spaces per unit (1-2 bed apartment)	
		1 space per unit (3+ bed apartment)	
	Creches	1 per 4 staff	

## 3.2 Ballincollig-Carrigaline Municipal District Local Area Plan 2017

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency
Section 3.5 Cork City South Environs	SE-GO-01 - Population and Housing To secure the development of 1,285 new dwellings in the South Environs between 2017 and 2023.	The subject development will provide 472 no. dwellings in the short term to serve the planned growth of the South Environs up to 2022.
	SE-GO-02 – Development Boundary All new development be located within the development boundary of the settlement established by this plan and which defines the extent to which the South Environs may grow during the lifetime of the plan.	The proposed development is located on appropriately zoned land within the development boundary of the South Environs.
	SE-GO-03 - Development Boundary The boundary of Cork City South Environs overlaps with and is adjacent to the Cork Harbour Special Area of Conservation and the Cork Harbour Special Protection Area.  Development in the town 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. Protection and enhancement of biodiversity resources within the receiving environment of the town will be encouraged.	An Appropriate Assessment will be provided as part of the formal SHD application documents.
	SE-GO-04 – Water Services  All new development shall be connected to the public water supply, the public waste water treatment system and shall make adequate provision for storm water disposal.	Th proposed development is in accordance with this objective. The proposed development will be designed in accordance with the requirements of Cork County Council and Irish Water.
	SE-GO-05 - Flooding All proposals for development within the areas identified as being at risk of flooding will need to comply, as appropriate, and with the provisions of the Ministerial Guidelines – 'The Planning System and Flood Risk Management'. In particular, a site-specific flood risk assessment will be required as described in Objectives FD 1-4, 1-5, and 1-6.	A site-specific flood risk assessment is provided in support of this SHD application. The proposed development has been designed in accordance with the findings and recommendations of same.
	SE-GO-07 - Walking and Cycling Develop a network of designated walking and cycling routes to provide a safe, convenient and pleasant routes between the town's main residential areas, schools and the town centre in line with the Metropolitan Cycling Strategy.	The proposed development places an emphasis on walking and cycling as a more appropriate mode of transport and seeks to improve connectivity wherever possible. Where appropriate, shared pathways have been introduced to ensure that every area of the development is accessible on bike. A comprehensive network of footpaths and amenity trails have also been provided to enhance the pedestrian environment. These footpaths are overlooked by the dwellings, providing for an improved perception of safety throughout the development. The extension to the greenway is also provided which will link to the existing greenway network in the area and increase permeability and connectivity in the surrounding area.
	SE-R-06 - Site Specific Zoning Development of this site is to include the following:  Medium A density residential development to cater for a variety of house types and sizes.  3 ha of additional open space over and above what is normally required in housing areas. This open space should include a fully landscaped and useable public park.	<ul> <li>The proposed development is in full accordance with these zoning objectives given that:</li> <li>The density of the proposed development falls within the density guidelines set out for Medium A Development in the CDP (see section 1.2.2 below);</li> <li>A large amount of open space is provided as part of the proposed development, with 53% of the site dedicated to both passive and active open space (see section 1.2.4 below);</li> </ul>

Reference	Relevant Policy / Principle / Guideline	Statement of Consistency	
	<ul> <li>Retain the existing trees and hedgerows within the overall development of the site.</li> <li>A site for a primary school that could be accessed from the R609 and developed by the Department of Education in the short term.</li> <li>The timing and provision of appropriate drinking water disposal services for the development including where necessary the upgrading of off-site infrastructure.</li> <li>Provision of a cycleway.</li> <li>Consideration will need to be given to the provision of a primary school within this site at the detailed planning application stage.</li> </ul>	<ul> <li>Significant effort has been made by the design team to retain and supplement the existing trees and hedgerows on site. These are used to frame the proposed development areas and have also been utilised to contribute to the recreation and amenity value of the site;</li> <li>Permission was granted to the Department of Education in April 2019 to provide a 24-classroom Educate Together Primary School within the lands zoned under the SE-R-06 objective (adjoining the northwest boundary of the site).</li> <li>The applicant's engineers have been in consultation with Irish Water regarding the potable water infrastructure for the development. A Confirmation of Feasibility accompanies this SHD application and outlines the specific measures necessary to facilitate the proposed development. A Confirmation of Design Acceptance by Irish Water is also provided as part of the planning application documents;</li> <li>A greenway is provided through the site which will link with the existing greenway infrastructure in the surrounding area;</li> </ul>	
	SE-U-04 Provide pedestrian walk through stream valley to Douglas Village	It is proposed that the landscape masterplan for the site includes the provision of a pedestrian walkway in this area – see submitted draft masterplan by AECOM.	

## 4.0 Conclusion

This Statement of Consistency provides an assessment of the proposed developments consistency with the relevant planning policy documents at national and local levels, including in particular the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)*, the *Urban Design Manual – A Best Practice Guide* and the *Design Manual for Urban Roads and Streets* at a national level, and the *2014 Cork County Development Plan* and *2017 Ballincollig-Carrigaline Municipal District Local Area Plan* at a Local Planning Policy level. It is submitted that the proposed SHD development is consistent with each of these documents and will provide a positive and significant contribution to the housing supply in Douglas, the South Environs and the greater Metropolitan Cork area.