



**Planning Statement, Statement of
Consistency & Response to
Board Opinion ABP-308980-20**

Proposed Strategic Housing Development at
Coolflugh, Cloghroe, Tower, Cork

Cloghroe Development Limited

January 2022

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Connecting places.

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01. Proposed Development & Context

1.1 Site Location and Context

The site of the proposed development [Cloghroe SHD] is approximately 7.5 hectares in area is situated in the townland of Coolflugh to the southwest of the joint settlements of Cloghroe/Tower, approximately 4km southwest of Blarney. The lands are currently in agricultural use and are irregular in shape consisting of two separate field parcels. The site is bounded to the east by the R617 regional road linking Cloghroe to Blarney and to the south by the Senandale residential development. To the north is a mix of open agricultural lands and one-off dwelling houses with further undeveloped agricultural fields to the west.

The site is situated proximate to several local services and amenities including, within short walking distance to Cloghroe National School and Cloghroe Church to the southeast of the site. The site is also situated immediately adjacent to an existing bus stop serving as the terminus of the No. 215 Cloghroe – Mahon Point bus route providing a half hourly service to urban centres including Blarney, Blackpool, the City Centre and Mahon.



Figure 1.1 Site Context

The existing settlement of Tower consists of two traditionally separate villages, Tower and Cloghroe, which have combined in recent decades to form a single settlement. The development context in Tower has evolved considerably in the past 30 years. The population of Tower grew to 3,032 people by 2002, having increased by 116.3% since 1991. The 2011 census calculated that in 2011, 3,306 people lived in Tower which was an increase of 6.6% from 2006. The most recent 2016 census recorded a population of 3,421, a further increase of over 3%.

The proposed development site, which was formerly within the functional area of Cork County Council, is now located within the recently expanded Cork City Council administrative area, following the boundary extension of May 2019. As a new Cork City Development Plan has yet to be made, the zoning and policy objectives for the site continue to be those set out in the Cork County Development Plan 2014. Similarly, the lands are covered by the Blarney Macroom Municipal District Local Area Plan 2017, which remains in force for the area until such time as a new Local Area Plan is adopted by Cork City Council.

1.1.2 Local Residential Context

Although currently designated as a 'key village' within the settlement hierarchy of the current Cork County Development Plan (CDP), Tower was classified as 'Main Settlement' until 2011 when it was downgraded to a 'key village' to accommodate future development at Monard in the settlement hierarchy. Tower currently has a greater population than Blarney which is currently categorised as a 'Metropolitan Town' in the CDP.

The 2017 LAP identifies a target of 182 no. additional residential units are to be provided in the settlement by 2023. However, a review of recent planning activity in Tower, confirms the settlement has outperformed this target. As of January 2022, approximately 224 no. residential units have been granted permission (203 of which are currently under construction or completed) in the settlement. A further 89 no. residential units are currently in the planning application process being assessed by Cork City Council. A summary of all significant pending and permitted planning applications for residential development which have occurred in Tower since the adoption of the LAP is provided in Table 01 below. The locations of these applications are illustrated on the accompanying Figure 1.2.

While Tower has grown strongly over the past 30 years and has become a very attractive town in Metropolitan Cork, in the longer term, Blarney with its proposed new rail station will become the primary settlement once more to the northwest of Cork city. The development boundary of Tower is likely to remain relatively constant into the future and the proposed SHD will contribute to the consolidation of the settlement and ensure the delivery of housing in tandem with local services. Tower is identified as forming part of Cork's BusConnects Network in the Cork Metropolitan Area Transport Strategy (CMATS), which will significantly improve the bus service and network. The proposed development makes provision for a future bus lane, which will form part of the BusConnects improved network.

Table 01: Permitted/Pending Planning Applications for Residential Development in Tower

Application Reference	Applicant(s)	Date Received	Description	Outcome/Current Status
Cork City Council Ref: 21/40620	Kevin McDonnell and Paul Coburn	03/11/2021	construction of 73 no. residential units	Currently being assessed by Cork City Council.
Cork City Council Ref: 21/40563	Gleann Fia Homes Ltd.	11/10/2021	Construction of 16 no. two storey dwellings	Currently being assessed by Cork City Council.
Cork City Council Ref: 20/39202	Tower Residential Developments Limited	25/03/2020	Construction of 37 no. dwelling houses	Final permission granted on 19 th May 2021. Construction has commenced on site.
Cork City Council Ref: 19/39001	Gleann Fia Homes Ltd.	20/12/2019	Construction of 40 no. dwelling houses	Final permission granted on 06/01/2021. Construction has commenced on site.
Cork County Council Ref: 19/4718	Whitebon Developments Ltd	25/03/2019	Construction of 12 no. dwelling houses	Final permission granted by Cork County Council on 08/08/2019. Construction has commenced on site.
Cork County Council Ref: 18/7111	Hydro Estates Ltd	29/11/2018	Construction of nursing home & 21 no. dwelling houses.	Conditional permission granted by Cork County Council on 13/08/2019. Decision upheld by An Bord Pleanála submission of third party appeals (Ref: ABP-305373-19).
Cork County Council Ref: 18/5562	Gleann Fia Homes Ltd	15/06/2018	Construction of 60 no. dwelling houses.	Conditional permission granted by Cork County Council on 25/10/2018. Subsequently permitted by An Bord Pleanála (Ref: ABP-303016-18) at appeal on 05/08/02. Construction has commenced on site.
Cork County Council Ref: 17/7253	Muskerry Homes Ltd	13/12/2017	Construction of 54 no. dwelling houses.	Permission granted by Cork County Council for on 27/11/ 2018. Construction has commenced on site with some units completed and occupied.

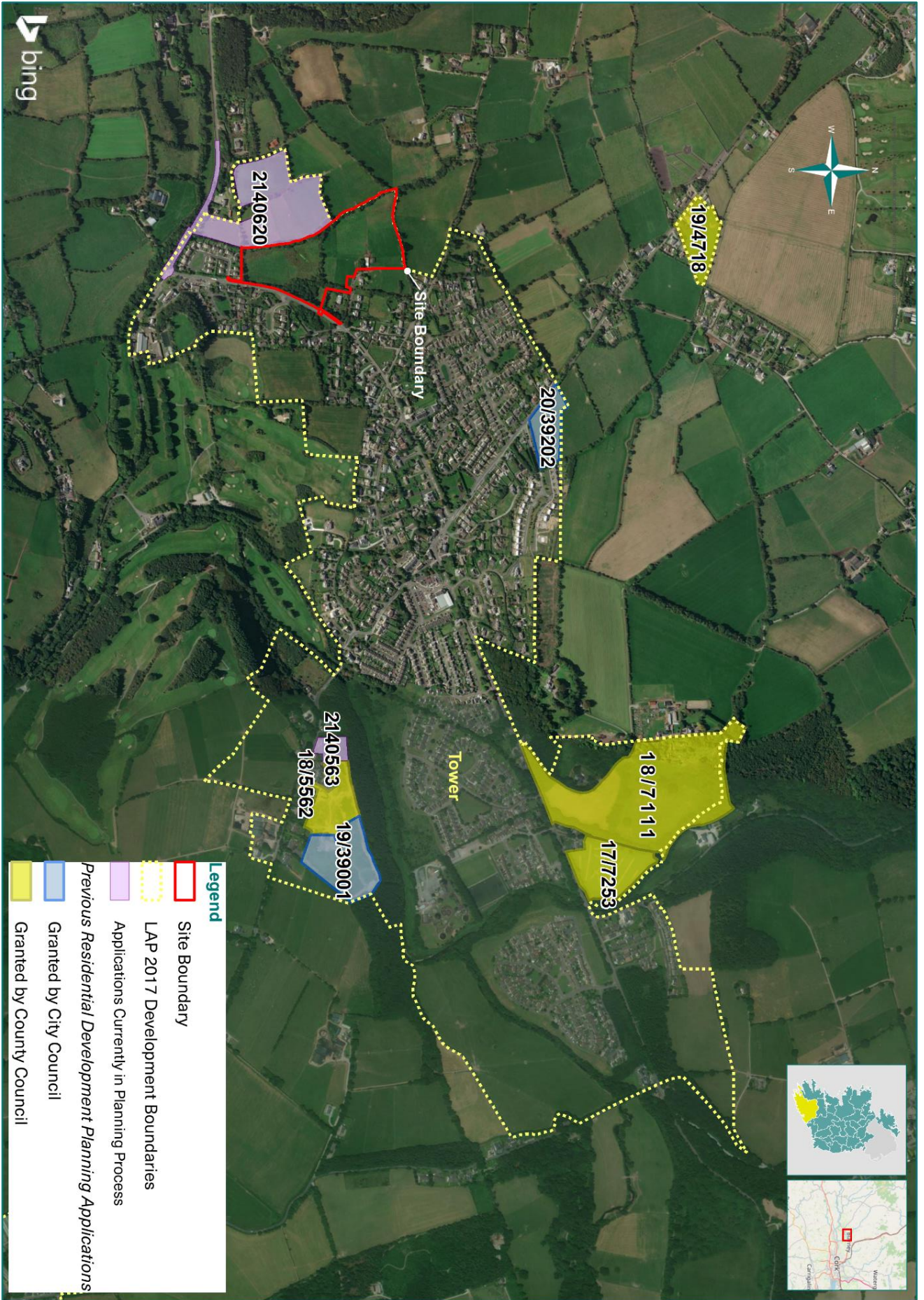


Figure 1.2 Planning Activity in Tower

1.1.3 Local Retail Context

There are currently two neighbourhood centre areas within Tower/Cloghroe providing a range of small-scale local services reflective of its traditional function as a village settlement. Within the settlement there are currently 3 no. convenience retail outlets, all of which serve differing purposes. Cloghroe Stores serves as a newsagent as well as the local post office while the Daybreak/Circle K functions primarily as the local service station while also acting as a newsagent. O'Learys SuperValu reflects a larger supermarket more suited to household grocery shopping.

Due to Tower's location, the settlement provides for a large rural hinterland for the provision of local services. Tower serves as the most convenient location for household retail shopping for rural areas to the north and west such as Cloghroe Upper, Maethy, Inniscarra, Donoughmore, Berrings, Dripsey and Courtbrack. Tower's importance as a retail centre for a large rural catchment is amplified by the limited retail provision in Blarney which contains a number smaller to medium sized retail outlets, however, there is no significantly sized supermarket in the settlement.

The current deficit in convenience retail provision in the area has the result that people living within the hinterland of Tower often travel further afield to urban centres, such as Blackpool and Ballincollig, to conduct their grocery and retail shopping. This encourages unsustainable and unnecessary travel patterns.

1.2 Pre-Application Discussions & Scheme Evolution

The rationale and evolution of the scheme is outlined in detail in Section 1 of the Architectural Design Statement prepared by Deady Gahan and which accompanies the application. In October 2020, the applicant submitted a request to Cork City Council for pre-application consultations in accordance with section 247 of the Planning and Development Act, 2000 regarding a proposed strategic housing development on the subject lands. The initial scheme consisted of 181 no. residential units, creche and supermarket as illustrated on Figure 1.3 below.

A pre-application consultation meeting took place with Cork City Council on 5th November 2020. In attendance were members of the project design team and representatives of the planning authority's Planning, Engineering, Traffic and Parks Departments as well as the City Architect.



Figure 1.3 Proposed Development at S247 Stage

Following the pre-application consultation with the planning authority, the following alterations were made to the layout of the proposed development:

- Provision of three storey apartment/duplex/townhouse units within the central area to form a strong built edge and streetscape fronting onto the public road and to create a more urban character.
- Relocation of the proposed step-down apartment building to a more central prominent location where it forms part of the central urban fabric of the site.
- Pedestrian link proposed to the north-eastern corner of the site providing pedestrian connectivity and a 'desire line' to Tower town centre to the northeast.
- Reorientation and redesign of units to the north of the woodland.

- Re-design of the central parkland establishing hedgerows/planting/and watercourses as key features and enhancing the biodiversity strategy for the site. Proposed units to the north and south have been clustered around this space which will form a valuable amenity for the residents.
- Revised details relating to the sites frontage with the R617 road, including reserving a route for a potential future bus lane, footpath, cycle path and relocation southwards of the existing bus stop.

The revised scheme of 189 residential units and a supermarket was the subject of pre-application consultations with the Board, as shown on Figure 1.4 below.



Figure 1.4 Pre-Consultation Application Layout

A Tri-Partite Meeting with An Bord Pleanála and Cork City Council took place on March 5th, 2021. In the subsequent ABP Opinion dated 22nd March 2021¹, it was stated the primary considerations that should be addressed were, '*Residential Density*', '*Surface Water Drainage and Flood Risk*' and '*Interaction with R617, Pedestrian and Cycle Connectivity*'.

Section 3 of the report contains the specific 'Response to ABP Opinion' and in summary the following are the alterations made to the scheme in response to the Board's Opinion:

- The density of the scheme has been increased and the proposed 198 no. residential units on developable site area 5.6 hectares reflects a residential scheme of 35 units per hectare. This represents an increase from that presented at pre-consultation stage where a development of 31.9 units per hectare was proposed.
- As requested in the ABP Opinion, the applicant consulted with Cork City Council's Drainage Department regarding the proposed surface water management and flood risk strategy for the site. The Site-Specific Flood Risk Assessment report which has been submitted with the application, including hydraulic modelling report, was prepared by Irish Hydrodata. This confirms the proposed development and surface water and flood risk proposals can be delivered independent of any works in third party lands or other flood relief works in the settlement.
- The proposed development provides for upgrades to the R617, comprising dedicated pedestrian and cycle paths along the subject site's roadside boundary and a signalised toucan crossing, promoting sustainable mobility in the settlement.

1.3 Description of Proposed Development

The proposed development consists of a strategic housing development comprising the construction of a mixed-use residential/retail development consisting of 198 no. residential units, a two-storey creche, a retail food store with ancillary surface car park, public realm upgrades, upgrades to the R617 road, landscaping proposals and all associated site development works. A short summary of some of the key development statistics are contained in Tables 02 and 03 below.

¹ Case Reference: 308980-20

Table 02 – Key Statistics of Proposed Residential Development

Key Figures of Proposed SHD Development	
No. of units	198 (117 houses and 81 apartment/duplex units)
Site Area	7.5 ha
Developable Site Area	5.6 ha
Density (Residential Developable site area only)	Within the proposed residential developable area 196 no. residential units are proposed reflecting a residential density of 35 units per hectare.*
Plot Ratio	0.352 (Net Developable Residential Area)
Open Space provision	16% of residential developable site area - (14% is useable public open space)
Creche Details	A two storey 404.9 sqm 42 no. child capacity creche
Total Residential Car Parking spaces	287
Total Residential Bicycle spaces (including creche)	126 no. serving apartment units
Total Creche Car Parking Spaces.	9
Access	Provided via a new access from the R617 Cloghroe – Blarney Road

** 2 no. additional apartment units are proposed are first floor level of the proposed café building within the defined 'commercial developable area' of the proposed development. For the purposes of calculating the residential density of the proposed development these 2 no. units have not been factored into density calculations.*

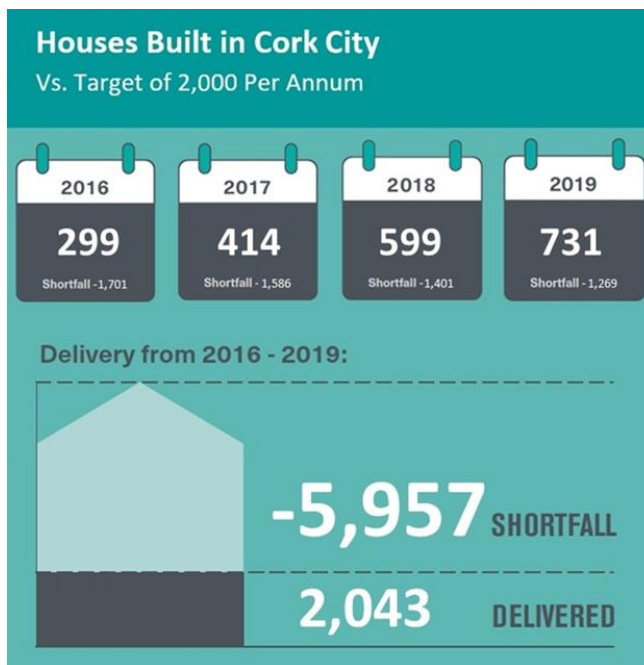
Table 03 – Key Statistics of Proposed Retail Development

Key Figures of Proposed Retail Development	
Commercial/Retail developable site area	0.81 ha
Retail foodstore floor area	1,895 sqm (gross) - 1,315 sqm (net)
Café floor area	186.3 sqm (gross) – 155.5 sqm (net)
No. of car parking spaces	101
No. of bicycle parking spaces.	26 no. spaces serving retail foodstore/café building.
Access	Access provided via an upgraded existing agricultural entrance from the R617 Cloghroe – Blarney Road. This represents a separate access point from the residential development to the north.

1.4 Housing Delivery in Metropolitan Cork

The National Planning Framework (NPF) outlines ambitious plans for the growth of Cork City and the Regional Spatial and Economic Strategy (RSES) and the Cork Metropolitan Area Strategic Plan (MASP), have defined the unprecedented population and housing targets required to realise these ambitions. MASP has set a 2031 population target of 286,178 for Cork City, an increase of over 75,000 or 36% on the 2016 Census Population of 210,853.

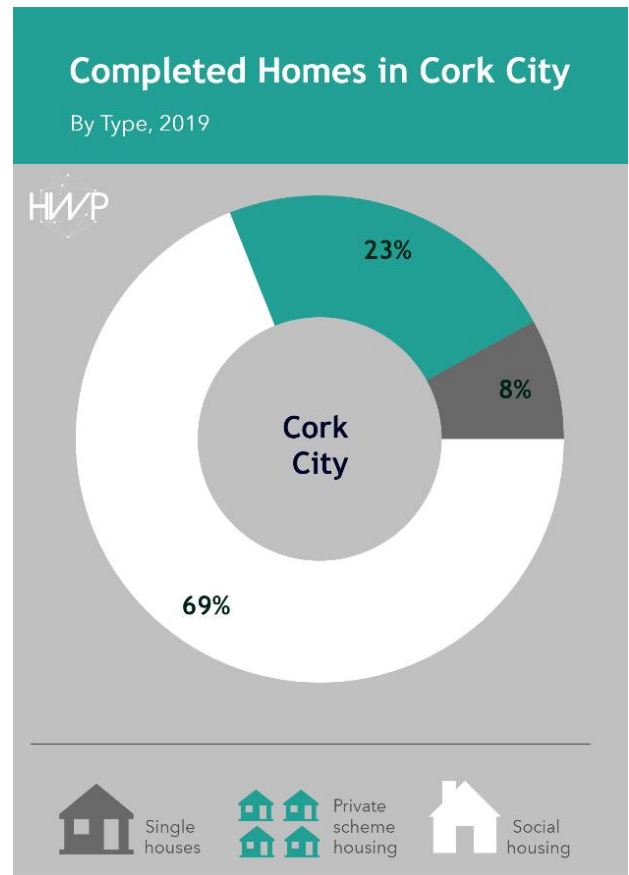
Section 3.2 of the Cork City Issues Paper indicates that in order to meet its 2031 population and housing targets, Cork City will have to deliver an average of 2,000 residential units annually in the period from 2016 to 2031. Since 2016, just 2,043 residential units have been delivered in Cork City, which is the equivalent of a single year's target. This poor delivery rate has resulted in a short fall of 5,957 units in the period from 2016 to 2019.



The following figures highlight the performance of Cork City in term of housing delivery and population growth. Based on the targets identified in previous City Development Plans, Cork City has performed poorly in terms of population growth in the recent past with just 21% of its 2022 target population growth achieved within the old City Boundary and 33% achieved within the new boundary.

It is clear that Cork City will miss its 2022 population targets by a considerable distance and is already well behind in the delivery of its 2031 housing target. This has a knock on effect. After 4 years just 2,043 of the 2031 target of 30,000 residential units have been delivered, with 27,957 units remaining to be delivered in the 11 year period from 2020 to 2031. Addressing the existing shortfall between 2020 and 2031 means the annual figure of 2,000 residential units referenced in the Council's Issues Paper becomes a yearly requirement of 2,541.

Within this, there is also the very important issue as to type of units being delivered. The Issues Paper and Cork City Socio – Economic Profile provide valuable data in relation to the tenure of the existing housing stock. An analysis of housing delivery in 2019 indicates that 69% of the 731 residential units delivered in Cork City were social houses. The news that Cork City Council exceeded its 2019 social housing target by 20%² is a very welcome and warranted response in the midst of the current housing crisis. However, the fact that just 23% of the 731 houses delivered in 2019 were private scheme units highlights the need for an increased emphasis on the delivery of private housing, in addition to the continued achievement of social housing targets.



Based on current targets and Government policy Cork City Council is likely to deliver approximately 500 social houses (new build) annually and therefore, there will be a requirement for approximately 2,000 private houses annually to comply with national and regional targets. This can only be achieved through an increased emphasis on the delivery of housing schemes in appropriate locations.

02. Statement of Consistency

This statement of consistency has been prepared in accordance with the provisions of subsection 5(2) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (“the 2016 Act”) and accompanies a Strategic Housing Development (SHD) planning application. The 2016 Act specifies that SHD applications must be accompanied by a statement which demonstrates that the proposed SHD is consistent with the relevant objectives of the relevant Development Plan or Local Area Plan, and any relevant guidelines issued by the Minister under section 28 of the Act of 2000. For the reasons set out in detail in this Statement of Consistency, the proposed Cloghroe SHD is consistent with the relevant provisions of national, regional and local planning policy, with only three exceptions.

In this latter context, a separate Statement of Material Contravention prepared by HW Planning also accompanies this application, which refers to 3 no. policies or objectives of the Cork County Development Plan and the Blarney Macroom Municipal District Local Area Plan 2017 that the proposed development materially contravenes:

- The proposed Cloghroe SHD provides for a net residential density of 35 units per hectare (of the developable residential site area). This is in excess of the suggested Medium B density (12-25 units / ha) indicated for Small Towns (settlements of less than 5,000 no. people) by Table 3.1 of the Cork County Development Plan.
- A total of 397 no. car parking spaces are proposed for the proposed development, which are allocated on the basis of housing type and likely demands of future residents. The proposed parking provision is below the Development Plan minimum standard of 2 spaces per house and 1.25 spaces per apartment as described in Table 1a, of Appendix D of the CDP).
- The proposed development exceeds standards identified in LAP Objective GO-01 and table 4.1 of the LAP regarding future development in the settlement of Tower. The proposed development of 198 no. residential units exceeds the recommended scale of any individual residential scheme in the settlement of 40 no. units and the overall scale of development in the settlement of 182 no. residential units during the lifetime of the 2017-2023 LAP.

2.1 National Planning Policy

2.1.1 Rebuilding Ireland

The action plan for housing and homelessness is based around 5 pillars, including the aim of building more homes as well as improving the rental sector. The plan includes a number of Action points relating to the 5 key pillars.

Policy	Consistency with Proposed Development
<p>Pillar 3 – Build More Homes</p> <p>Key Objective: Increase the output of private housing to meet demand at affordable prices</p> <p>Build More Homes aims to support the building of new homes and outlines the Government objective “to ramp up delivery of housing from its current under-supply across all tenures to help individuals and families meet their housing needs”. This Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021.</p> <p>The plan outlines a number of key steps that should be taken to deliver on the pillar three objective including:</p> <ul style="list-style-type: none"> • Planning reforms • Putting in place a National Planning Framework and land management actions • Efficient design and delivery methods to lower housing delivery costs • Measures to support construction innovation and skills. 	<p>The location and suitability of the subject site, as well as proposed mix of dwellings, including social housing component, ensures that the proposed SHD will contribute positively to meeting the Pillar 3 objective of doubling the completion level of additional homes in the next four years to deliver over 25,000 homes on average per annum.</p> <p>The proposed development constitutes “Strategic Housing Development”. In addition, as outlined below, the proposal is consistent with the National Planning Framework and its stated aim of consolidating new population and housing growth within the footprint of the existing settlements.</p>
<p>The action plan notes “there is an acute shortage of apartment developments in the centre of Cork, despite a growing demand from new FDI-type employers establishing adjacent to the city centre, because of the gap between delivery costs and prices of second-hand homes in the wider Cork city area. Therefore, closing the supply gap, particularly in the right locations, is critically dependent on ensuring viability of housing provision, taking account of the prices that are affordable to potential buyers and renters.</p>	<p>The proposed development site is in a key sustainable location in close proximity to all employment centres in the Cork Metropolitan area including Blarney, Blackpool and Ballincollig which contain several business parks, industrial estates and office developments. The subject site is situated adjacent to the terminus of the 215 no. Cloghroe – Jacobs Island bus route, currently providing a half-hourly public transport link to employment centres such as Blarney, Blackpool, the Cork City Centre and Mahon. The proposed development provides for a diverse range of accommodation from 5 no. four bedroom detached family dwellings to 79 no. one and two bed apartment/duplex units forming a significant element of the proposed development. The proposed development will contribute positively to addressing the acute shortage of apartment type development in the wider Cork city area.</p> <p>The proposed development will also positively contribute to the provision of affordable homes in the local area and within Metropolitan Cork. The wide range of house and apartment types provided within the 198 no. units to be delivered will improve competitiveness in the housing</p>

market and provide greater choice to renters and potential buyers to reside at a sustainable location.

2.1.2 Project Ireland 2040: National Planning Framework

National Planning Framework outlines the policies and objectives for development in Ireland up to 2040 given the expected population growth of 1 million people. The Framework is underlined by a number of strategic outcomes including compact growth, sustainable mobility and the transition to a low carbon and climate resilient society. The purpose of the NPF is outlined as being to enable all parts of the country to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's ongoing key role.

Policy	Consistency with Scheme
<p><u><i>National Policy Objective 2A</i></u> - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.</p> <p><u><i>National Policy Objective 3B</i></u> - Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</p> <p><u><i>National Policy Objective 3c</i></u>- Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints</p> <p><u><i>National Policy Objective 4</i></u> - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</p> <p><u><i>National Policy Objective 8</i></u> - Ensure that the targeted pattern of population growth of Ireland's <i>cities</i> to 2040 is in accordance with the targets set out in Table 4.1.</p> <p><u><i>National Policy Objective 11</i></u> - In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</p> <p><u><i>Key Future Growth Enablers for Cork include:</i></u></p> <ul style="list-style-type: none"> Progressing the sustainable development of new greenfield areas for housing, especially 	<p>The proposed development is consistent with all strategic aims and objectives contained in the NPF. The development is in accordance with National Policy Objectives 2a, 3b, 3c and 8 which aim to increase Cork City and suburbs to a minimum population of 314,000 by 2040 and which will require a growth rate of 50-60%. The proposed SHD development will contribute to an attractive and diverse settlement as enshrined in NPO 4. The subject site is situated within the development boundary of Tower, within walking distance of all of the settlements amenities and reflects the appropriate residential expansion of the settlement. The proposed development also provides for the expansion of the existing neighbourhood centre at Cloghroe and will enhance the local economy of the town by the provision of additional retail floorspace.</p> <p>The proposed development is consistent with NPO 11 of the NPF. The proposed retail/commercial components of the scheme will assist in the creation of local employment and boost the local economy. The proposed development will assist the settlement in meeting its future residential and retail needs going forward.</p> <p>Objective 33 of the NPF emphasises the importance of providing homes in locations that can support sustainable development. The Key Future Growth Enablers for Cork include the sustainable development of appropriately located greenfield sites for new housing, particularly on public transport corridors. The subject lands are situated</p>

those on public transport corridors, such as Monard.

- Identifying infill and regeneration opportunities to intensify housing development in inner city and inner suburban areas, supported by public realm and urban amenity projects

The plan also outlines 10 national strategic outcomes which include

- Compact Growth
- Sustainable Mobility
- Enhanced Amenity and Heritage
- Transition to a low carbon and climate resilient society
- Access to Quality Childcare, Education and Health Service.

National Policy Objective 32 - To target the delivery of 550,000 additional households to 2040.

National Policy Objective 33 - To prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 35- Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

adjacent to a bus stop of the 215 no. Cloghroe – Jacobs Island bus route providing a service every 30 minutes to urban and employment centres of Blarney, Blackpool, City Centre and Mahon. The publication of the Cork Metropolitan Area Transport Strategy (CMATS) indicates this route is included within the ‘Core Radial Bus Network’ suggesting that the route is poised to benefit from an improvement in the frequency of bus services and potentially operate at a frequency of 15 minutes or better. The subject site is well positioned to capitalise on the existing and any future upgrades of public transport opportunities in the settlement. The proposed development will also provide for public realm and footpath/cycle upgrades on the R617 benefitting the wider settlement.

The subject lands are included within the settlement boundary of Tower. The proposed development will contribute directly to a positive increase in residential density in the area, whilst appropriately respecting the established built environment. It will contribute directly to the realisation of compact growth and will provide a critical mass of population to underpin the viability of the enhanced public transport and promote sustainable mobility in the area.

2.2 S. 28 Ministerial Guidelines & Urban Design Manual

2.2.1 Guidelines for Planning Authorities: Sustainable Residential Development in Urban Areas 2009

The ‘Guidelines for Planning Authorities: Sustainable Residential Development in Urban Areas 2009’ (SRDUA) were developed with the objective of delivering high quality and sustainable residential developments. Tower can be defined as a ‘Small Town/Village’ according to criteria identified in the SRDUA with a population of between 400 and 5,000 people.

Policy

The SRDUA outline common planning goals for housing developers, their design teams, the planning system, and the community they serve as follows:

Consistency with Scheme

By virtue of its location, the proposed development shall contribute to the delivery of the quality of life aims of the Sustainable Residential Development Guidelines.

- **Prioritise walking, cycling and public transport, and minimise the need to use cars;**
- **Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;**
- **Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;**
- **Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;**
- **Are easy to access for all and to find one's way around;**
- **Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;**
- **Provide a mix of land uses to minimise transport demand;**
- **Promote social integration and provide accommodation for a diverse range of household types and age groups;**
- **Enhance and protect the green infrastructure and biodiversity; and**
- **Enhance and protect the built and natural heritage.**

- The proposed development promotes walkability and sustainable transport patterns by way of its location close to all amenities in Cloghroe and Tower and its location immediately adjacent to the terminus for the 215 no. Cloghroe – Jacobs Island bus route. The proposed layout and provision of pedestrian links to the R617, footpaths, pedestrian crossing and cycle lanes will facilitate connectivity and permeability, both within the site and its wider context.
- The public amenity areas /open spaces have been designed in accordance with the highest urban design principles. They will all be conveniently located in accessible areas of the site and the provision of raised tables/surface treatments and pedestrian crossings at key locations will provide a safe and welcoming environment for residents and visitors alike. The development will enhance permeability throughout the settlement by providing pedestrian and cycle paths through the site which will also benefit existing residents in the village.
- The design and layout of the proposed open spaces will contribute to an enhanced sense of place and will serve as nodes for communal activities. The proposed central parkland, wooded area and urban plaza are all well connected and accessible through a series of footpaths and amenity walks, assisting in providing a legible and coherent layout.
- The proposed development will not only provide a high-quality residential neighbourhood but also the proposed commercial uses, including retail foodstore and café, will serve as a focal point of the settlement. The site is accessible on foot due to the existing compact nature of the settlement with the proposed pedestrian/cyclist upgrades to the R617.
- The provision of a large central parkland, and the provision of the eastern wooded area and strong boundary treatments will contribute to the preservation of the existing character of the site and wider area of Tower. The proposed layout responds to the existing ground conditions and incorporates existing drains/stream as attractive landscaping features. The landscaping measures

proposed will contribute to high quality public realm and provide new and improved opportunities for biodiversity and wildlife.

- The provision of a 42 no. child capacity creche as part of the proposed development will provide an important community facility and also enhance the social element within the development. The proposed location of the creche, to the south of the residential development entrance, is also appropriate and provides a transition between the commercial/retail uses at the south of the site, and the residential development to the north.
- The proposed housing mix provides for a wide range of house/apartment types from 1 and 2 bedroom apartments to 2, 3 and 4-bedroom detached, semi-detached and townhouses. The housing mix promotes social integration and cohesion and will add to diversity of the development.
- The proposed open spaces associated with the scheme have been designed according to best proactive Urban Design principles.

General Advice for Development in 'Small Town/Villages'

a) Development in smaller towns and villages must be plan led

b) New development should contribute to compact towns and villages.

It is appropriate that the investment in such services is utilised properly through the prioritisation of development that either re-uses brown-field development land such as central area sites and backlands or through the development of acceptable "green-field" sites at suitable locations within the immediate environs of the small town or village concerned. Designs for the development of backlands should seek, where feasible, to maximise permeability for pedestrians and connectivity to existing streets and roads, rather than creating cul-de-sacs and dead-ends.

- a) As demonstrated in the Local Planning Policy section of this report the proposed development is consistent with the policies and objectives of the Blarney Macroom Municipal District Local Area Plan 2017 and Cork County Development Plan 2014 (with 3 no. exceptions, as identified above).
- b) The proposed development will contribute to a more compact and self-contained settlement. The site represents underutilised prime development land to the southwest of the existing village centre and to the northwest of the Cloghroe neighbourhood centre containing Cloghroe primary school, church and local newsagent and post office. The proposed development will contribute to the natural evolution of the overall settlement by facilitating the sustainable development of the Cloghroe and Tower villages. The proposed public realm upgrades along the R617 in particular will enhance permeability and connectivity throughout the settlement, especially for pedestrians and cyclists.

c) Higher densities are appropriate in certain locations

Significant enhancement of the scale and density of development in small towns and villages may be appropriate in locations close to Gateways and Hubs designated under the NSS, that are served by existing and/or planned high quality public transport corridors and that have been earmarked for particular development functions in regional planning guidelines and development plans

e) The scale of new residential schemes for development should be in proportion to the pattern and grain of existing development.

c) The site's location, proximate to a half-hourly suburban bus service, lends itself to being suitable site for higher density development. The southern areas of the site are most appropriate for retail/commercial uses. The subject site is situated adjacent to the existing Coolflugh (Cloghroe) terminus/starting point of the 215 no. route. As there are no previous stops on the 215 no. route, this reflects that the 215, which starts at Cloghroe and proceeds to the other referenced urban centres is likely empty once stationed at the Coolflugh (Cloghroe) bus stop. In advance of preparation of this application, the National Transport Authority (NTA) were contacted regarding the capacity of the existing 215 no. route. As detailed in the accompanying email correspondence with the NTA (Appendix C of accompanying Material Contravention Statement), the 215 no. route is currently served by bus, which has a normal capacity of 76 no. seated passengers and 15 no. standing passengers. As the 215 no. route operates 2 no. services every hour, approximately 180 no. bus spaces are available from the Coolflugh (Cloghroe) bus stop every hour. This reflects that there is sufficient current bus capacity to serve the proposed development.

e) The scale of the proposed development is appropriate and contributes to a compact, sustainable, residential development while respecting the traditional settlement pattern of Tower/Cloghroe. The proposed scale of residential development is comparable to a number of existing residential estates in Tower, including, Willison Park (circa 160 no. units) Gleann na Ri (circa 130 no. units), Laureston (circa 90 units), Riverview (80 units) and Oakmount (80 units). The site's location within and the comprehensive suite of landscaping proposals will ensure that the proposed development will not have a significant visual impact.

Density Standards

Edge of Centre sites:

The emphasis will be on achieving successful transition from central areas to areas at the edge of the smaller town or village concerned. Development

The site's location is at the edge of the village of Tower and is, therefore, an 'edge of centre' site as referenced in the Guidelines. The proposed development provides for a density of approximately 35 units per hectare of the developable residential site area and provides a variety of

of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 20-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.

District/Neighbourhood Centre Uses

The scale and nature of new retail provision in a new district or neighbourhood will be influenced by the development plan retail strategy. Convenience shops should generally be located centrally within the development but regard should be had to the location of the residential development within the wider area; the provision of new comparison/convenience retail floorspace should not be on such a scale as to undermine existing city / town centre vitality and viability. The need to travel can be minimised if other commercial, leisure and community uses, including local employment where appropriate, can be located in close proximity and are well served by public transport.

house and apartment types providing for all aspects of the housing market.

The proposed retail expansion of the settlement is consistent with the 'District/Neighbourhood Centre Uses' guidance in the SRDUA. In 'Anticipating Future Needs' for small towns and villages, section 2.15 of the SRDUA states:

"Distinctive small towns and villages perform different functions and new development might spark the need to strengthen existing functions such as the need for additional retail capacity to facilitate new residential development. In such cases, consideration should be given to how to make adequate provision for such additional retail functions in central locations as well as considering the new residential development that may give rise to such additional requirements."

The proposed retail/commercial uses to the south of the site are located within walking and cycling distance of all areas of the settlement and will assist in the consolidation of the locally important Cloghroe neighbourhood centre. The proposed commercial uses will not have any negative effects on the existing residential amenity of the settlement and instead will cater for anticipated future housing and population growth within the settlement and its significant hinterland, reflecting an integrated approach between the delivery of relevant services with projected population growth.

As evidenced in the Retail Impact Assessment (RIA) which accompanies this application, there is a current leakage of retail activity from the settlement to other urban centres such as Blackpool and Ballincollig, resulting in a negative impact on the local economy and contributing to unsustainable travelling patterns.

The proposed retail/commercial uses will facilitate the required expansion of the local retail sector and boost the local employment market in Tower. The development will enhance the local economy by retaining economic activity and creating a neighbourhood centre for the towns existing and future inhabitants. The proposed retail/commercial uses are easily accessible from the

nearby 215 no. bus stop and will reflect a sustainable public transport orientated local neighbourhood centre.

2.2.2 Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2018

The 'Sustainable Urban Housing: Design Standards for New Apartments' guidelines, were published in 2018. The guidelines refer to the need to significantly increase supply as a key pillar of the overarching Rebuilding Ireland Housing Action Plan. The guidelines indicate that urban areas are the most suitable locations for apartments and divide these areas into 3 categories.

Policy	Consistency with Scheme
<p>Section 2.4 of the Guidelines define "Peripheral and/or Less Accessible Urban Locations" as follows</p> <p>"Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:</p> <ul style="list-style-type: none"> ▪ Sites in suburban development areas that do not meet proximity or accessibility criteria; ▪ Sites in small towns or villages. <p>The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.</p>	<p>The site of the proposed Cloghroe SHD constitutes a "Peripheral and/or Less Accessible Urban Locations". Tower is categorised as a 'key village' settlement in the 2014 County Development Plan and 2017 LAP and a 'small town/village' as defined by the SRDUA.</p> <p>The proposed density of 35 units per hectare of the residential developable site area provides for a mix of apartments, duplexes, step down units and terraced/semi-detached housing at an appropriate scale according to guidance in Section 2.4.</p>
<p><u>Specific Planning Policy Requirement 1</u></p> <p>Apartment developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</p> <p>2.21 The mix parameters set out above that generally apply to apartments, do not apply to purpose-built</p>	<p>The proposed development comprises 81 no. apartment/duplex units. Of this amount 27 no. (22 no. 1 bed and 5 no. 2 bed) are purpose-built step-down units which will serve as a sheltered housing scheme for elderly residents.</p> <p>In accordance with section 2.21 of the Guidelines these purpose-built step-down units have been omitted from the calculations stipulated in SPPR 1.</p> <p>Of the remaining 54 no. conventional apartment/duplex units, the proposed mix is consistent with standards identified in SPPR1:</p> <ul style="list-style-type: none"> ▪ 22 no. 1 bedroom units (40.7%) ▪ 30 no. 2 bedroom units (55.5%)

<p>student accommodation or to certain social housing schemes, such as sheltered housing.</p>	<ul style="list-style-type: none"> ▪ 2 no. 3 bedroom units (3.7%)
<p><u>Safeguarding Higher Standards</u></p> <p>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%.</p>	<p>As confirmed in the accompanying Housing Quality Assessment prepared by Deady Gahan Architects, the vast majority of proposed apartment/duplex units exceed minimum floor areas by more than 10%.</p>
<p><u>Specific Planning Policy Requirement 3</u></p> <p>Minimum Apartment Floor Areas</p> <ul style="list-style-type: none"> • Studio apartment (1 person) – 37 sq. m • 1-bedroom apartment (2 persons) – 45 sq. m • 2-bedroom apartment (4 persons) – 73 sq.m • 3-bedroom apartment (5 persons) – 90 sq. m 	<p>The accompanying Housing Quality Assessment prepared by Deady Gahan Architects demonstrates that <u>all</u> apartments within the proposed SHD are consistent with the minimum floor areas as set out in SPPR3.</p>
<p><u>Specific Planning Policy Requirement 4</u></p> <p>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</p> <p>.....</p> <p>(ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.</p>	<p>As outlined in the accompanying schedule of accommodation, 95% of the proposed apartment/duplex units are at least dual aspect.</p>
<p><u>Specific Planning Policy Requirement 5</u></p> <p>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m 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 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</p>	<p>Ground level floor to ceiling heights of 2.7 metres are provided for in the apartments.</p>
<p><u>Specific Planning Policy Requirement 6</u></p> <p>A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment</p>	<p>In accordance with this requirement, no one apartment block contains more than 12 apartments per floor per core.</p>

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.

Planning applications for apartment development shall include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents.

A general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.

The accompanying Building Lifecycle Report prepared by Aramark outlines a schedule of all external and internal building fabric including roofs, rainwater goods, walls, balconies, floors, common areas.

The proposed development provides 134 no. bicycle spaces across the entire scheme. Drawing no. 20068/P/012 prepared by Deady Gahan Architects details the full breakdown of the bicycle parking allocations across the site which are allocated as follows:

1. GF apartments and upper duplex apartments (4 no. 1 beds, 24 no. 2 beds, 2 no. 3 beds). Ground floor apartments that have direct access to their allocated private amenity space can utilise this for bicycle storage. The applicant proposes to provide 76 bicycle spaces to serve these units which is in excess of the standards of 73 no. spaces.
2. Stepdwn units – Proposal provides for 27 no. spaces equating to 1 space per unit - These units have been designed specifically to cater for an elderly section of the population and a reduced quantum of cycle parking is considered appropriate. The proposed achieves the standards set out in the Cork County Development Plan of 0.5 bike spaces per 1/2 bed units.
3. 2 no. 2-bed apartments over café Requirement – 8 no. bicycle parking spaces being provided to serve proposed apartment units (5 no. spaces) and café (3 no. spaces).
4. The proposed development also includes scooter charging facilities at ground floor of block 6. (Refer to accompanying plans prepared by Deady Gahan Architects).

The remaining 23 no. spaces from the total are intended to serve the proposed foodstore (18 no. spaces) and the creche (5 no. spaces).

A minimum of 7 sq. m of private open space required for 2 bedroom apartments (4 person) with 3 sq. m to be provided for 1 bedroom apartment units.

All proposed apartment units have been equipped with the required private open space provision. Please refer to the attached Housing Quality Assessment prepared by Deady Gahan Architects.

2.2.3 Urban Development and Building Height Guidelines 2018

The Building Height Guidelines have arisen from a recognition that the ambitious targets contained within the NPF, particularly in relation to accommodating 50% of future growth within the existing footprint of our settlements, will not be met unless developments of greater height and scale are supported by the Planning Authorities.

Policy	Consistency
<p>The Guidelines introduced Special Planning Policy Requirements (SPPRs) which were broader in focus than those contained in the Sustainable Urban Housing: Design Standards for New Apartments (2018). SPPR 4 supported the previous Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and specified:</p> <p><i>“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:</i></p> <p>SPPR4 (1), the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled <u>“Sustainable Residential Development in Urban Areas (2007)”</u> or any amending or replacement Guidelines;</p>	<p>In accordance with the SPPR 4 and the SRDUA, the subject site can be described as an ‘edge of centre’ location. As referred previously, Section 6.11 of the SRDUA indicates the following in terms of housing densities on edge of centre sites:</p> <p><i>“..... Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of <u>20-35 dwellings per hectare</u> will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.”</i></p> <p>As referenced previously, the net density of the proposed development is 35 units per hectare. This density is consistent with SPPR 4 of ‘Building Height Guidelines 2018’ which refer compliance with the density range of 20-35 units per hectare outlined in the SRDUA requirements.</p> <p>‘Net density’, is defined in Appendix A of the SRDUA as:</p> <p><i>“A net site density measure is a more refined estimate than a gross site density measure and includes only those areas which will be developed for housing and directly associated uses. These will include:</i></p> <ul style="list-style-type: none"> ▪ <i>access roads within the site;</i> ▪ <i>private garden space;</i> ▪ <i>car parking areas;</i> ▪ <i>incidental open space and landscaping; and</i> ▪ <i>children’s play areas where these are to be provided.</i> <p><i>It therefore excludes:</i></p>

- *major and local distributor roads;*
- *primary schools, churches, local shopping etc.;*
- *open spaces serving a wider area;*
and
- *significant landscape buffer strips.*

The total site area of the proposed residential/retail development is 7.5 hectares, with a net residential developable area of 5.6 hectares. The figure below, illustrates the developable area/net density area defined for the proposed residential development.

Although 198 no. residential units are proposed in total, the net density includes for 196 no. units. This is due to 2 no. proposed apartment units being at first floor level of the proposed café building within the defined 'commercial developable area' to the south of the site. For the purposes of calculating the residential density of the proposed development these 2 no. units have not been factored into net density calculations.



The areas omitted from the net density calculation, include.

- The 'commercial developable area' containing proposed retail/café units to the south of the site.
- The areas within the red line proposed for public realm improvements on the R617.
- Landscaped buffer strip along the sites western boundary adjacent to the existing western boundary stream/watercourse, reserved for a streamside amenity walk to serve the development.
- Significant landscape buffer areas to the east/northeast of the site, which facilitate pedestrian connections to the R617 and existing

	<p>cul de sac to the north. Due to site levels and the presence of an existing woodland and land drain in this area. it is not considered developable and should be incorporated into the sites wider landscape/connectivity strategies.</p> <p>The calculation of the proposed density net density of 35 units per hectare, is therefore in accordance with the net density calculations identified in Appendix A of the SRDUA and SPPR 4 of the Building Height Guidelines.</p>
<p><i>SPPR 4 (2). a greater mix of building heights and typologies in planning for the future development of suburban locations; and</i></p> <p><i>SPPR 4 (3). avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."</i></p>	<p>(2) The proposed development provides for an appropriate variety of building heights and typologies across the site which assist in defining character areas across the development. The proposed development provides 6 no. three storey apartment buildings providing conventional duplex apartment units in addition to a step-down units, more appropriate for elderly residents.</p> <p>(3) As detailed above, the proposed development provides for a wide range of building typologies and housing mix complementary of the sites location relative to the existing settlement and public transport opportunities.</p>
<p><u>Development Management Criteria</u></p> <p>In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:</p>	<p>See below.</p>
<p><u>At the scale of the relevant city/town</u></p> <p>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</p> <p>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</p>	<p>The subject site is situated adjacent to the 215 no. bus route, with the proposed development and public realm upgrades facilitating enhanced access to the existing bus stop for the settlements existing population.</p> <p>The proposed site layout has been designed to integrate with sites terrain and location within the wider settlement. The concentration of three storey buildings in the southern areas of the site is reflective of this areas proximity to Cloghroe Neighbourhood Centre, and provides a strong urban edge to the scheme from the sites entrance. The northern, more elevated areas of the site are predominantly occupied by two storey dwelling houses which will assimilate into the wider landscape.</p> <p>The development strategy for the proposed development has been 'landscape led' with a key emphasis on the placement of new buildings which will positively</p>

On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

contribute to the built fabric of the existing settlement and the achievement of appropriate density reflective of the site's location proximate to local amenities and public transport opportunities.

The scale and form of the proposed development will integrate positively with the existing settlement pattern of the area and will contribute to a more compact/self-sufficient settlement going forward.

At the scale of the district/neighbourhood/ street

The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.

The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.

The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

As outlined in the accompanying Architectural Design Statement prepared by Deady Gahan Architects and landscaping information prepared by Forestbird Design, the proposed development would introduce a built townscape character along the R617, positively enhancing the site in its context of the surrounding area.

As detailed in the accompanying landscape details prepared by Forestbird Design and Chapter 4 'Landscape & Visual' of the EIAR, the subject lands have the capacity to absorb change due to the character being dominated by the proximity of Cork City. In time, the proposal will become an accepted part of the landscape.

The combination of public open spaces thought the scheme and the orientation of buildings over these areas and the central amenity area will ensure that all areas of the site are well served by passive surveillance and will be attractive and useable areas to avail of.

The proposal will introduce a mixture of dwelling types to the area, from apartments, and duplexes to terraced, semi-detached and detached housing. The proposed retail unit and café building will provide the Cloghroe Neighbourhood Centre with a strong presence on both sides of the R617, ensuring a strong urban presence on entry to the settlement from the south.

At the scale of the site/building

The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

The form and massing of the scheme has been chosen to respond to the topography and orientation of the site and to maximise availability of daylight and views to the south.

Due to the nature of the site and its location in its receiving environment, it is not considered that the development will result in any negatives impacts in terms of daylight/sunlight on neighbouring properties.

Specific Assessments

The majority of the proposed residential units comprise 2 storey dwelling houses with 6 no. 3 storey apartment buildings in total. Due to the nature of the proposed development and its context with the existing urban

To support proposals at some or all of these scales, specific assessments may be required, and these may include:

Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.

In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

form/footprint of the settlement it is not considered that the proposed buildings present any potential for micro climatic or downdraft effects.

Chapter 9 of the EIAR and the accompanying NIS prepared and ecological details by Atkins describes the potential ecological impacts of the proposed development including impacts on sensitive habitats. It is objectively concluded that the proposed development and mitigation measures proposed will result in no significant adverse impacts on Natura 2000 sites or biodiversity in the area.

It is not anticipated that the proposed development, at this scale, would create any significant negative impacts on important telecommunication channels

2.2.4 Urban Design Manual: A Best Practice Guide

The proposed development has been designed in accordance with best practice as outlined in the 2009 Urban Design Manual. The Manual outlines 12 criteria that should guide urban residential development in the context of the individual homes, the site on which they are located and the wider neighbourhood. A comprehensive "Architectural Design Statement" prepared by Deady Gahan Architects accompanies this application which addresses the proposed developments compliance with these 12 criteria.

2.2.5 Childcare Facilities: Guidelines for Planning Authorities 2001

The National Childcare Guidelines for Planning Authorities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

Policy	Consistency with Scheme
<p><u>The Guidelines were intended to:</u></p> <p>Provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. Planning permission for premises for childcare had been identified as an area of concern for childcare service development. These Guidelines are intended to ensure a consistency of approach throughout the country to the treatment of applications for planning permission for childcare Facilities.</p>	<p>The proposed development can be identified as a 'larger housing development' and is consistent with the locational factors as outlined in the guidelines for new childcare facilities. The application includes a proposal for a 404.9 sqm, 42 child creche to meet potential future needs generated by the development as well as providing a valuable community outlet in the settlement.</p> <p>HW Planning engaged with Cork County and Cork City Childcare Committees in advance of preparing this SHD planning application. The feedback received has directly</p>

They outline appropriate locations for childcare facilities including;

- New communities / Larger new housing developments
- The vicinity of concentrations of work places, such as industrial estates, business parks and any other locations where there are significant numbers working.
- In the vicinity of schools.
- Neighbourhood, District and Town Centres.
- Adjacent to public transport corridors, park-and-ride facilities, pedestrian routes and dedicated cycle ways.

informed the design and layout of the proposed creche facility.

HW Planning also shared the proposed site plan and creche plans with both Childcare Committees in preparation of this SHD application as requested in item 11 of the ABP Opinion. Full details are contained in the 'Childcare Needs Assessment' prepared by HW Planning which accompanies the planning application.

2.2.6 The Planning System and Flood Risk Management Guidelines 2009

Policy	Consistency with Scheme
<p><u>Among the core objectives of the Guidelines are to:</u></p> <ul style="list-style-type: none"> ▪ Avoid inappropriate development in areas at risk of flooding; ▪ Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off; ▪ Avoid unnecessary restriction of national, regional or local economic and social growth; <p>There are three types or levels of flood zones defined for the purposes of these Guidelines:</p> <p><u>Flood Zone A</u> – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);</p> <p><u>Flood Zone B</u> – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and</p> <p><u>Flood Zone C</u>– where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B.</p> <p><u>Key Messages of Flooding and Development Management are:</u></p>	<p>The subject lands themselves are contained within Flood Zone C according to OPW flood mapping. Regarding development in Flood Zone C areas, paragraph 3.5 of the Guidelines state:</p> <p><i>“Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast) but would need to meet the normal range of other proper planning and sustainable development considerations.”</i></p> <p>Due to presence of Flood Zone Areas A/B to the south of, but outside, the site of the proposed SHD, a Site-Specific Flood Risk Assessment (SSFRA) been prepared and accompanies this SHD application. As part of the SSFRA, detailed hydraulic modelling has been carried out for the site and surrounding areas.</p> <p>The SSFRA confirms that the proposed flood defence and surface water proposals (which include several attenuation tanks, 1200m³ of underground flood water storage and 600m² drainage basin storage) - will effectively manage the risk of flooding in accordance with the recommendations of the Guidelines. While the proposed development will reduce the available flood plain area, the mitigation measures will increase volume storage available increases by 500m³ and eliminate the risk of flooding on the site.</p>

- Planning authorities should apply the sequential approach in aiming to avoid development in areas at risk of flooding, through the development management process.
- Planning applications will, where appropriate, need to be accompanied by a detailed flood risk assessment to be considered by planning authorities in determining applications.
- Development within flood risk areas, that would be defined as inappropriate as set out in chapter 3, but which are considered to be necessary to meet the objectives of proper planning and sustainable development, will be subject to the Justification Test.
- Most flood risk issues should be raised within strategic assessments undertaken by local authorities at the plan-making stage. Therefore, as more plans are reviewed and zoning reconsidered, there should be less need for development management processes to require detailed flood risk assessment.

The proposed works which also include a headwall with non-return valve at southern boundary land drain, and attenuated surface water drainage system will have the added benefit of protecting dwellings in Senandale to the south from future flood events generated from the existing western boundary stream.

Sequential Approach

The subject land is included within the development boundary of Tower as defined by the current Local Area Plan where the principle of development is accepted. The LAP illustrates Zone A/B flood risk area approximately 80m to the south but flood zones do not extend to the subject site. The OPW website has no record of flooding events on the site. Mapping produced by the OPW for the Lee CFRAM study shows localised flooding to the south across the R579 but again it does not show any flooding within the site.

In accordance with Section 5.8 of the Flood Risk Guidelines and given the presence of a stream on the western boundary, the applicants at pre-application stage committed to preparing a site-specific flood risk assessment (SSFRA), which has been submitted with the planning application. Given the low risk of flooding identified on the proposed SHD site, the proposed development is consistent with the “sequential approach” advocated by Section 3.2 of the Flood Risk Guidelines and complies with “the broad philosophy underpinning the sequential approach in flood risk management”.

A sequential approach to planning is a key tool in ensuring that development, particularly new development, is first and foremost directed towards land that is at low risk of flooding. Sequential approaches are already established and working effectively in other areas in the plan making and development management processes (e.g. retail planning). The sequential approach described in Fig. 3.1 should be applied to all stages of the planning and development management process. Fig. 3.2 (below) describes its mechanism for use in the planning process.

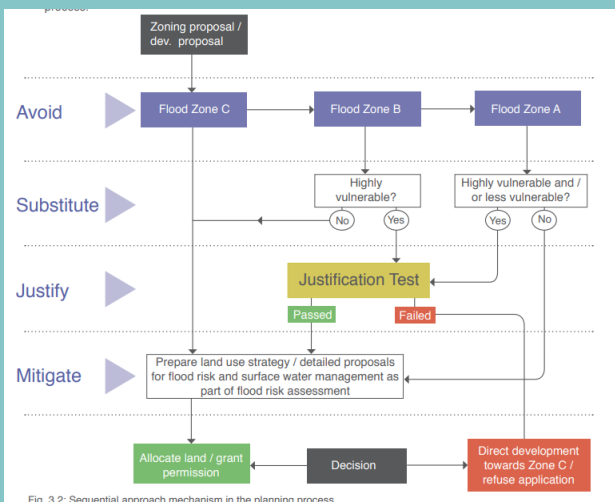


Fig. 3.2 Sequential approach mechanism in the planning process

Application of the Justification Test in development management

When considering proposals for development, which may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2, the following criteria must be satisfied:

1. The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of these Guidelines.
2. The proposal has been subject to an appropriate flood risk assessment that demonstrates:
 - (i) The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk;

Section 4.1 of the SSFRA prepared by Irish Hydrodata describes how the proposed development satisfies criteria for the 'Justification test' outlined in the Guidelines.

1. The completed Site-Specific Flood Risk Assessment confirms that the subject lands are contained within the development boundary of Tower as defined by the 2017 Municipal District Local Area Plan. The Local Area Plan illustrates that Flood Zones A/B are approximately 80 metres to the south of the lands. The Local Area Plan was adopted in accordance with the Flood Risk Guidelines and contained a Strategic Flood Risk Assessment.

2 (i) The completed SSFRA highlights that the proposed development will not increase flood risk elsewhere and the lands to the west, which may experience a marginal increase in flood water, will remain within Flood Zone A. The proposed development will have no impact on the future development strategy or potential of these lands which are currently subject to planning application for residential development for 73 no. units, under planning reference 21/40620). The proposed development will

(ii) The development proposal includes measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible;

(iii) The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access; and

(iv) The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.

reduce the flood risk on adjoining properties in Senandale, to the south.

(ii) The mitigation measures proposed as part of the proposed development will increase the volume of flood storage available by 500m³ and eliminate the risk of flooding of dwellings in Senandale from the potential future flooding events resultant from the western boundary stream.

2 (iii) The proposed underground storage tanks will include a flow control structure on the drainage channel along the boundary with Senandale to ensure backflow from the stream does not occur and this will ensure the continued protection of adjoining properties. This will ensure that residual risks are managed to an acceptable level.

2 (iv) The flood risk is confined to the south-west of the subject site and the flood mitigation measures have no impact on the design of the streetscape to the west or the proposed public plaza area, which will contribute to the vibrancy and vitality of the area in a positive manner.

Accordingly, the criteria of that Development Management Justification Test are met in respect of the proposed development.

2.3 Retail Policy & Guidelines

This Section should be read in conjunction with the accompanying 'Retail Impact Assessment' prepared by HW Planning.

2.3.1 Guidelines for Planning Authorities Retail Planning 2012

The 2012 Retail Planning Guidelines (RPG's) aims to ensure that the planning system continues to play a key role in supporting competitiveness in the retail sector for the benefit of the consumer in accordance with proper planning and sustainable development. The RPG recognises the importance of retailing to the economies of small towns and villages and promotes the sustainable expansion of retail uses in these settlements. Specifically, paragraph 4.11.5 of the RPG, 'Retailing in Small Towns and Villages' states;

"Where appropriate, the maximum size of store, consistent with maintaining a variety of shops in the centre of these towns and villages and protecting an appropriate level of retail provision in the rural area, should be identified. In general there should be a clear presumption stated in favour of central or edge-of-centre locations for new developments."

The RPG's have five key objectives, specifically:

- Ensuring that retail development is plan-led.
- Promoting city/town centre vitality through a sequential approach to development.

- Securing competitiveness in the retail sector by actively enabling good quality development proposals to come forward in suitable locations.
- Facilitating a shift towards increased access to retailing by public transport, cycling and walking in accordance with the Smarter Travel strategy and
- Delivering quality urban design outcomes.

These policy objectives are reflected in the following policies contained in Section 4.9 of the RPG's.

Policy	Consistency with Scheme
<p>Support the long-term strategy for city/town centres as established in the retail strategy/development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres</p>	<p>Improving the convenience retail provision in the town of Tower will provide long-term benefits to the settlement. Increased choice in retail outlets will facilitate the growth of the local economy of the settlement and is reflective of strong recent population growth trends in the settlement. A review of recent planning activity in Tower, confirms the settlement has outperformed its housing growth targets identified in the current 2017 Local Area Plan (LAP). As of January 2022, 223 no. residential units have been granted permission (202 of which are currently under construction) in the settlement since the adoption of the LAP. A further 89 no. residential units (not including the proposed SHD development) are currently in various stages of the planning application process in Tower. This includes an application for the construction of 73 no. residential units at the lands to the west of the site, currently being assessed by Cork City Council. (Planning Reference 21/40620).</p> <p>The strong demand and delivery of new housing in Tower, is reflective of the settlement's positive attributes and potential as a service centre for its wider catchment, The provision of the proposed retail/mixed-use development to cater for the settlements growing population will result in a more self-sufficient settlement and not materially diminish future private sector investment in the settlement or in neighbouring urban centres such as Blarney and Ballincollig.</p>
<p>Have the potential to Increase employment opportunities and promote economic regeneration</p>	<p>The provision of additional retail uses and the expansion of the Cloghroe Neighbourhood Centre in particular, provides excellent potential to provide employment opportunities locally. As evidenced in 2016 Census figures, despite being on a regular suburban bus route, Tower exhibits high levels of car dependency with</p> <ul style="list-style-type: none"> ▪ 86% of Towers residents commute to school, college and work by private vehicle. ▪ 7% of Towers residents commute to school, college and work by public transport.

- 3% of Towers residents commute to school, college and work by walking/cycling.

This suggests, that despite a growing population in the settlement, there are few employment opportunities locally. The expansion of the retail sector within the town serviced by regular public transport links provides an opportunity to enhance the economy and employment opportunities in the settlement and promote sustainable commuting patterns.

Have the potential to increase competition within the area and thereby attract further consumers to the area

Providing additional retail floorspace in Tower will improve local competitiveness within the retail sector and benefit the local economy as a whole. As evidenced in Section 4 of this RIA, it is evident the present convenience retail provision in Tower is deficient for its inhabitants and those in its large rural hinterland. This has resulted in a leakage in potential retail activity from the town to other settlements such as Ballincollig and Blackpool.

As referenced previously, Tower has performed strongly in the delivery of new housing in recent years, and it is likely that future censuses at the settlement will demonstrate high levels of population growth. The retailing needs of the current and future population of Tower and catchment will need to be catered for. It is considered that the non-delivery of additional retail floorspace in the settlement will result in a further lack of competitiveness in the retail economy of the settlement and injurious to the sustainable growth of Tower into the future.

Respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support

As referenced, there is currently a leakage of potential economic and retail activity from the town, which it is losing to other urban centres. The appropriate increase of convenience retail floorspace in Tower will assist in reversing this trend and respond to local demand.

Cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent developments or other outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community

Enhancing the retail provision in Tower will not result in any negative effects on the wider functions of Tower. Rather it is considered that the recent performance of the settlement in terms of new residential units in the pipeline, requires an appropriate increase in retail provision.

Due to the evidenced demand for additional retail uses in the area, the provision of an appropriate increase in retail floorspace in Tower will not negatively other existing and proposed urban centres including Blarney and Stoneview Urban Expansion Area. Notwithstanding this, the lack of certainty around the timeline of the delivery of Stoneview and the ambitious population targets set for the City over the

	<p>next 20 years requires relevant infrastructure and services to be delivered in the short term.</p>
<p>Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;</p>	<p>It is objectively considered that any reasonable expansion in retail provision in Tower/Cloghroe will not result in any increase in commercial vacancy in the settlement. Each of the existing retail outlets in the settlement has its own specific functions (e.g. newsagents/post office, service station and local supermarket) reflecting a broad range of local retail functions. It is concluded that there is capacity to cater for a further intensification of retail uses in the town and would not result in any negative effects to the existing retail provision.</p>
<p>Ensure a high standard of access both by public transport, foot and private car so That the proposal is easily accessible by all sections of society; and/or link effectively with an existing city/town centre so that there is likely to be commercial synergy</p>	<p>Tower/Cloghroe is well served by a public transport link in the 215 no. bus route which leaves Cloghroe every 30 minutes. The settlement is set to benefit from improved public transport services through CMATS/BusConnects. The Draft BusConnects strategy for Cork identifies a potential new bus route from Ballincollig - Cork (via Tower and Blarney) along the R617 with a weekday midday frequency of a service every 60 minutes (Draft BusConnects Reference 16L). Draft BusConnects also identifies a potential additional bus service serving the village core of Tower on the Blarney - Cork via Kerry Pike with an envisaged weekday service of every 120 minutes (Draft BusConnects Reference 53).</p> <p>The proposed development also provides for public realm upgrades on the R617, including the relocation of existing bus stop and provision of bus shelter, and pedestrian cycle lanes resulting that the proposed retail development will be conveniently accessible via sustainable transport modes for consumers and staff.</p>

2.3.2 Metropolitan Cork Joint Retail Strategy 2015

The Metropolitan Cork Joint Retail Strategy 2015 (MCJRS) was commissioned following the publication of the 2012 Retail Planning Guidelines and reflects joint retail strategies and policies on behalf of Cork City Council and Cork County Council. The MCJRS was published prior to the implementation of the Cork City Boundary extension in June 2019 and the future re-categorisation of the settlement hierarchy of both Local Authorities. The Retail Hierarchy for Metropolitan Cork is being reassessed as part of the reviews of the current County and City Development Plans which are currently taking place.

Policy	Consistency with Scheme
<p>Tower is categorised as a Level 4 'Neighbourhood Centres and Large Village Centre' in the retail hierarchy of the MCJRS. Section 4.9 of the MCJRS states these centres;</p> <p><i>"provide important top up and day to day shopping and retail service requirements. They are typically characterised by an appropriately scaled convenience offer and ancillary retail services and serve a small localised catchment population."</i></p> <p>This is enshrined in Policy 6 of the strategy which states the role of Neighbourhood Centres and Large Village Centres is;</p> <p><i>"To support, promote and protect Neighbourhood Centres and Large Village Centres which play an important role in the local shopping role for residents and provide a range of essential day to day services and facilities. The opportunity for development of new neighbourhood centres will be identified in Development Plans or Local Area Plans as appropriate including where significant additional population growth is planned or where gaps in existing provision are identified."</i></p>	<p>The 2015 MCJRS were adopted 4 years before the 2019 City Boundary Extension which includes Tower. The settlement's 'Level 4' position on the retail hierarchy is inconsistent with the 2012 RPGs and the Tower exhibits characteristics of a level 3 'Small Metropolitan Town' to allow future retail development to be provided to cater for strong recent and future housing and population growth of the settlement.</p> <p>Notwithstanding the above, the proposed retail development is consistent with Policy 6 of the MCJRS which aims to deliver retail development.</p> <p><i>"where significant additional population growth is planned or where gaps in existing provision are identified."</i></p> <p>As described in this statement, since the adoption of the 2017 LAP, over 200 no. new homes are either completed or under construction in Tower. As detailed in the accompanying Retail Impact Assessment, Tower caters for a significant rural hinterland in terms of retail provision which has resulted in a current deficiency in retail floorspace in the settlement.</p> <p>Section 10 of the MCJRS refers to the continued monitoring and review of the strategy with Section 10.1 stating:</p> <p><i>"The Joint Retail Study advises that Retail trends should be monitored over the lifetime of a retail study and that retail policies should be updated to reflect these trends where appropriate. A monitoring system will be put in place by the City and County Authorities to ensure that any necessary adjustments in policy can be made. As most of the projected retail floorspace requirement is linked to population growth, monitoring will take account of progress towards achieving population targets and adjust the strategy if appropriate."</i></p> <p>Section 10 of the MCJRS acknowledges that the policies and objectives of the strategy should be updated and adjusted as necessary where trends affecting the retail context are evident. The proposed development will contribute to addressing the current demonstrable shortage in retail floorspace in the settlement and increase competition without negatively impacting the retail hierarchy of the MCJRS. This would ensure that the retail</p>

policies for Tower reflect the existing context and future growth of the settlement.

2.4 Regional Planning Policy

2.4.1 Southern Regional Assembly: Regional Spatial and Economic Strategy

The purpose of the Regional Spatial and Economic Strategies (RSES) is to support the implementation of the National Planning Framework while facilitating choices that reflect the differing needs of the regions. The strategies are being proposed in the context of a renewed focus on “Regional Parity” in the NPF, being promoted to address anti-competitive pressures on Dublin by offering more sustainable choices and options for people, businesses and communities that can positively influence more sustainable patterns of living and working which befit our entire society and make our economy more equitable and resilient. The vision for the Southern Region is outlined in the RSES as follows:

“To promote the Southern Region as an attractive, competitive and sustainable place to live, work and visit, a region of considerable opportunity for growth based on the quality of its cities, towns and rural areas, well developed physical and social infrastructure, a diverse modern economy and a pristine natural environment.”

Policy	Consistency with Scheme
<p>The RSES profiles the Southern Region and establishes a strategy to improve the Region through 11 distinct strands which include:</p> <ul style="list-style-type: none"> ▪ Compact Growth ▪ Strengthening and growing our cities and metropolitan areas, building on the strong network of towns throughout the region ▪ Building a competitive, innovative and productive economy. ▪ Providing infrastructure and services in a sustainable, planned and infrastructure-led manner. <p>Key principles in developing the strategy for the RSES include;</p> <ul style="list-style-type: none"> ▪ No place or community is left behind by the RSES. A dual-track strategy is pursued that builds on the cities, metropolitan areas as significantly scaled engines of sustainable growth, and supports opportunities for competitive advantage by repositioning the Region’s strong network of towns, villages 	<p>The proposed development is in accordance with all relevant core objectives of the RSES. The proposed development will contribute to a more compact settlement going forward. The administrative settlement of Tower consists of 2 no. traditionally separate villages, Tower and Cloghroe. Although there has been an incremental coalescence of the two villages in recent years, both villages remain distinctly separate, resulting in a disconnection between some of the local services provided in Cloghroe (Cloghroe school, church and post office) which the larger residential centre in Tower. The proposed development which consists of the delivery of development on the western side of the R617 will assist in urbanising the streetscape and facilitate the further amalgamation of the two villages into a sustainable small town, concentrated around local retail and commercial opportunities.</p> <p>The proposed development will positively contribute to the village’s local economy. As demonstrated in the Retail Impact Assessment which accompanies this application, there is a current deficiency in the retail provision in Tower, resulting in a leakage of economic activity from the settlement. The proposed development will address this current shortage and create employment opportunities for</p>

and rural areas in an imaginative, sustainable and smart manner;

- Provide strong regional support for policy and initiatives at the local level which...strengthen the urban fabric and role of settlements servicing hinterlands, consolidate existing settlements.

the local population, as well as contributing a critical population mass required in order to support local businesses.

Some of the key specific aims include:

- Population increase of between 350,000 and 375,000 people between now and the year 2040.
- Cork City and suburbs population increasing by 115,000 additional people (an increase of more than 55%) from a population of 209,000 in 2016 to 324,000 by the year 2040.

The proposed development of 198 no. residential units will contribute to the significant housing demand in Metropolitan Cork and achieving targeted population growth. According to the 2016 Census, the estimated average household size in Tower is 3.0 persons per household. This reflects an estimated uplift of 600 no. people being accommodated in the residential component of the proposed development.

Regional Policy Objective (RPO) 5 - Population Growth and Environmental Criteria

Increased population growth should be planned with regard to environmental criteria, including:

- Assimilative capacity of the receiving environment.
- Proximity of Natura 2000 sites and potential for adverse effects on these sites, and their conservation objectives.
- Areas with flood potential

The proposed development is located in close proximity to the centre of Tower and represents the appropriate residential and commercial expansion of the settlement. The proposal has been shaped taking into consideration the environmental constraints of the site including, specifically, the existing drains/watercourses within the site.

An Environmental Impact Assessment Report and Natura Impact Statement accompany this planning application. It has been concluded that the proposed development will not, either alone or in combination with other plans or projects, have any adverse effects on any European sites. In addition, the EIAR has assessed all likely significant effects on the environment arising from the proposed Cloghroe SHD.

The attached Engineering Design Report prepared by MHL & Associates Consulting Engineers and Site-Specific Flood Risk Assessment report prepared by Irish Hydrodata provides a comprehensive analysis of flood risk considerations of the proposed development.

Flood risk factors have been a critical design consideration of the proposed development which has been led by detailed hydraulic modelling in both the site-specific and wider settlement context. A core principle of the proposed development strategy has been to ensure that the existing residents at Senandale to the south are protected from any potential flood events generated from the existing western

boundary stream and that the development potential of adjacent lands are not negatively affected.

The site of the proposed SHD is not included within Flood Risk Zones A or B, however, areas to the south of the site and Cloghroe Village are contained within flood risk areas due to the presence of the Owennagearagh River and an existing stream along the development site's western boundary.

Item 2 of the ABP Opinion advised the applicant to consult with Cork City Council's Drainage Section in advance of submission of the SHD application. The proposed drainage and flood defence strategy for the proposed development has been informed by consultations with Cork City Council.

In addition to responding specifically to the Board's Opinion, the Site-Specific Flood Risk Assessment has had full regard to the Board's decision to refuse permission for the development of 73 no. dwellings to the west of the subject site (ABP ref. no. 307785-20) and the observations of Senandale Residents Association on the original planning application (reg. ref. no. 19/5413). The Board decided that the development proposed under that application would be premature pending the carrying out of works to mitigate flooding along the R579. The subject development is not dependent on the R579 for access.

We note that a revised scheme of 73 no. dwellings was submitted at the subject lands to the west in November 2021. (reg. ref. no. 21/40620). Cork City Council requested further information regarding the development on 06/01/2022. As per previously proposed schemes at the lands to the west, the proposed SHD is not dependent on the delivery of any flood protection measures at the lands to the west in order to accommodate the proposed development and will not impact the development potential of those lands.

The flood risk investigations confirm that the proposed flood mitigation/drainage measures will have a positive impact on the wider settlement of Tower/Cloghroe. Specifically, the proposed compensatory flood storage, headwall with non-return valve at southern boundary land drain, and attenuated surface water drainage system will remove the existing risk of flooding occurring within the site and protect the Senandale residential development to the south from future flood events generated from the existing western boundary stream.

	<p>In the northern areas of the site the proposed basins/wetland meadows and attenuation storage tanks are consistent with guidance relating to SUDs and will contribute to a significant improvement in terms of flood protection infrastructure and surface water disposal over the existing scenario.</p>
<p><u>RPO 9 - Holistic Approach to Delivering Infrastructure</u></p> <p>It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritises the delivery of compact growth and sustainable mobility in accordance with NPF objectives including:</p> <p>Water services, digital, green infrastructure, transport and sustainable travel, community and social, renewable energy, recreation, open space amenity, climate change adaptation and future proofing infrastructure including Flood Risk management measures, environmental improvement, arts, culture and public realm.</p>	<p>The proposed development will provide for increased population growth in an area that is well served by existing public transport linkages and will promote non- car modes of transport.</p> <p>The proposed public realm improvements along the R617 will provide an enhanced level of sustainable connectivity in the town and will significantly improve the pedestrian and cyclist experience for all residents in the settlement.</p> <p>The proposed development incorporates Sustainable Urban Drainage Systems (SUDS) and green infrastructure as part of the wider surface water drainage strategy for the lands.</p>
<p><u>RPO 10 - Compact Growth in Metropolitan Areas</u></p> <ul style="list-style-type: none"> a) Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling. b) Deliver design briefs for strategic sites; 	<p>The proposed development is consistent with RPO 10 by providing both housing and employment opportunities within an area which is contiguous to the existing footprint of Cork City and the proposed development is within sustainable and safe walking and cycling distance of all areas of Tower and public transport links.</p>
<p><u>RPO 26 – Towns and Villages</u></p> <p>It is an objective:</p> <ul style="list-style-type: none"> f) To ensure that development plans tailor the appropriate planning response by reference to the scale, nature and location of the settlement. Local authorities will identify settlements which can play an enhanced role at sub-regional level to drive the development of their area; 	<p>Due to its large rural catchment, in particular to the north and west, Tower is well positioned to play increasingly important local role in wider Metropolitan Cork for the provision of services. It is considered the facilitation of additional retail development in the settlement represents an opportunity for the settlement to fulfill its potential as an important service centre. An analysis of the wider area confirms that the next significant urban settlement situated along the R579 is Kanturk, approximately 42 km northwest. This reflects that there is potential to capture passing economic trade from the R579 ensuring Tower can play and increasingly important sub-regional role in the context of the City's Metropolitan Area. It is also considered that, given the anticipated population increases to occur at the settlement and catchment in the</p>

coming years, that Tower typifies a settlement which should be identified for such a role.

Regarding the provision of future retail development RPO 55 states it is an objective to:

- a) Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations *in* regeneration / public realm projects and other measures.**
- b) Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category.**

The proposed retail component of the development will significantly improve the physical appearance of the area and particularly the streetscape along the R617. At present the western side of the road between Cloghroe and Tower is rural in nature which is not conducive with the site's urban setting. The public realm proposals including the provision of dedicated cycle lanes and footpaths, signalised pedestrian crossing and relocation of the existing bus stop will assist in urbanising the streetscape and ensure a more legible and self-sufficient settlement is achieved.

An analysis of the available lands in the Tower/Cloghroe confirms the subject site represents the most proximate undeveloped and available lands to the existing settlement core and satisfies the sequential approach. The provision of retail development at this location is appropriate as it would provide an opportunity to expand the existing Cloghroe neighbourhood centre and provide a balance to the settlement in terms retail provision with Tower Neighbourhood Centre to the east of the settlement.

RPO 151 - Integration of Land Use and Transport

The following principles of land use and transport integration will guide development:

- a) For urban-generated development, the development of lands, within or contiguous with the existing urban areas will be prioritised over development in less accessible locations.**
- b) Residential development will be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport- including infill and brownfield sites are prioritised.**
- c) Larger scale, trip intensive developments, such as offices and retail, will be focused into central locations highly accessible by sustainable transport modes;**

The proposed development satisfies all of the criteria outlined in RPO 151. The subject site is situated within the existing development boundary for Tower and will promote increased and safer levels of walking and cycling within the settlement. The proposed retail element will consolidate the existing Cloghroe Neighborhood Centre to the east and will be well positioned to benefit from existing and future upgrades to the public transport network as identified in CMATS and Draft BusConnects.

The RSES places a significant emphasis on quality placemaking and the creation of new sustainable

The subject site is ideally located to capitalise on its sustainable location within walking distance of all local services in Tower. As evidenced on the Connectivity Maps

neighborhoods. RPO 176 '10 minute City and Town Concepts' aims to.

"attain sustainable compact settlements whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services".

prepared by HW Planning (Appendix B of this statement), the site is located an approximate 5 minute walk (2 minute cycle) from Cloghroe Church and Cloghroe National School to the south east as well as a local pharmacy, beauticians, fitness studio, post office and newsagents within Cloghroe Neighbourhood Centre.

The site is also situated within 10-15 minute walk (5 minute cycle) of further local services provided for in Tower such as Tower Neighbourhood Centre, doctors surgery, physiotherapists, launderettes, pubs, restaurants and service station. The proposed public realm upgrades along the R617 will further improve mobility for pedestrian and cyclists in the settlement.

Tower is situated within the Cork MASP region. Cork MASP Policy Objective 1 states the following overall objectives for the Cork Metropolitan Area Strategic Plan (MASP) area.

- a) To promote the Cork Metropolitan Area as a cohesive metropolitan employment and property market where population and employment growth is integrated with:
.....(ii) the continued regeneration, consolidation and infrastructure led growth of the city centre, Cork City Docklands, Tivoli and suburban areas (iii) active land management initiatives to enable future infrastructure led expansion of the city and suburbs (to be assessed by Core Strategy initiatives) and (iv) the regeneration, consolidation and infrastructure led growth of metropolitan towns and other strategic employment locations in a sustainable manner.
- b) The Cork MASP allows flexibility to respond to changes in planning policy, infrastructure requirements and prioritises that will arise in the area which will be added to Cork City as a result of the boundary extension.
- c) Support communities in Metropolitan Towns..... seek vibrant metropolitan communities with a high quality of life, mixed uses and services and seek the infrastructure led sustainable compact growth of metropolitan settlements.

The proposed development is fully consistent with the guiding principles and core objectives for the Cork MASP. The proposed mixed-use development will assist in delivering future housing growth in tandem with employment and retail provision and positively contribute to Towers overall role in the Cork MASP.

Section 3.2 of the Cork MASP refers to the Guiding Principles for the future of the area including the following:

- **Compact Sustainable Growth** - *Promote consolidation of Cork City and suburbs, refocus on the development of brownfield and infill lands to achieve a target of a minimum 50% of all new homes within the existing built up footprint in Cork and 30% in other metropolitan settlements.*
- **Integrated Transport and Land Use** - *Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects under the development of a Cork Metropolitan Area Transport Strategy (CMATS).*
- **Accelerate Housing Delivery** - *Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply.*
- **Enabling infrastructure** - *Identify Infrastructure capacity issues and ensure water / waste water needs, municipal and C&D waste capacity issues are met by national projects. Improve sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation.*
- **Better alignment of growth** - *Target 'catch up' investment to support employment, infrastructure and amenity provision and/or sustainable transport links in metropolitan towns and suburban areas that have experienced high levels of population growth but are reliant on other areas for employment and/or services.*

As referenced previously, the proposed development represents an opportunity to provide for the compact and sustainable expansion of Tower. The subject site will be poised to benefit from future upgrades to the local public transport network, particularly the future enhanced 215 no. bus service as identified in CMATS. The proposed public realm and connectivity upgrades along the R617 will ensure that pedestrian and cyclist connectivity to the relocated bus stop and Cloghroe and Tower Neighbourhood Centres will be enhanced by the proposed development enhancing the quality of life for all existing and future residents in the settlement.

The proposed development to contribute to the acceleration of housing delivery and address the well-publicised housing shortage in Cork City and its suburbs.

Cork MASP Policy Objective 16 – 'Retail' aims to

- a) **Support the role of Metropolitan Cork as a Level 1 location for retail provision and the retail hierarchy for as identified in the Metropolitan Cork Joint Retail Strategy 2013 which identifies:**
- **Level 4: Neighbourhood Centres and Large Village Centres**

Cork MASP Objective 16 refers to the Metropolitan Cork Joint Retail Strategy. The appropriate expansion of the retail sector in Tower will represent the appropriate growth of commercial and employment activity in the context of the settlements future population growth.

- b) Support the role of the Metropolitan Cork Joint Retail Strategy and seek further preparation of joint retail strategies for Metropolitan Cork between Cork City Council and Cork County Council in accordance with Section 28 Retail Planning Guidelines for Planning Authorities (2012).

2.4.2 Cork Metropolitan Area Transport Strategy (CMATS)

Cork Metropolitan Transport Strategy (CMATS) has been published in the context of the National Planning Framework which envisages that Cork will become the fastest growing city region in Ireland in the coming years. This projected population and associated economic growth will result in a significant increase in the demand for travel. This demand needs to be managed and planned for carefully to safeguard and enhance Cork’s attractiveness to live, work, visit and invest in.

Policy	Consistency with Scheme
<p>CMATS Land-Use priorities include:</p> <ul style="list-style-type: none"> ▪ Ensure effective integration between transport and land-use through the delivery of Public Transport Orientated Development (PTOD). PTOD is consolidated development that provides higher density, a balanced mixed of land uses and compact settlements that reduce trip distances and are of a magnitude that supports the viability of high capacity public transport; ▪ The application of this principle in Cork will result in a high-intensity, mix of uses being directed to locations at existing or planned stations along the suburban and light rail lines and along the high frequency bus corridors; ▪ Deliver consolidated development in a manner that can avail of existing transport infrastructure, nearby amenities and facilities in the short term to deliver a critical mass of growth in population and employment which can support the transition and sequencing of investment to higher capacity public transport infrastructure and services ▪ Land use policies that minimise the requirement to travel longer distances, particularly during peak times, by encouraging mixed-use development. This should include ensuring areas are developed 	<p>Tower is identified as a settlement which is to benefit from the future Bus Connects scheme identified in CMATS with the 215 no. Cloghroe – Jacobs Island route identified on the ‘Core Radial Bus Network’. A significant improvement in the frequency of bus services (Bus Connects) on these radial routes is also proposed, with most routes expected to operate at a frequency of 15 minutes or better. Draft BusConnects identifies the following potential bus routes of varying frequencies, which may serve Tower in the future.</p> <ul style="list-style-type: none"> ▪ Cloghroe – Cork Bus Station (Draft BusConnects Reference: 16) ▪ Ballincollig to Cork Bus Station via Blarney (Draft BusConnects Reference: 16L) ▪ Blarney to Cork Bus Station via Kerry Pike (Draft BusConnects Reference: 53) <p>The proposed development is consistent with all land-use priorities identified in CMATS. In particular it is in accordance with guidance relating to mixed-use developments along public transport corridors. The development site’s location, which is proximate to an existing high frequency bus route serving urban settlements such as Blarney, Blackpool, the city centre and Mahon, is consistent with Public Orientated Transport Development (PTOD) as promoted in CMATS. Due to the proposed commercial and creche uses, at least to an extent, the development itself will become an employment and economic destination well served by public transport opportunities.</p>

in tandem with the delivery of schools and other amenities to maximise the use of more sustainable modes of transport such as walking and cycling; and

- Land use policies that support the provision and design of new development in locations, layouts and at densities which prioritise walking and cycling and enable the efficient provision of public transport services.

The site's beneficial location within walking/cycling distance of all areas of the settlement will also promote increased levels of walking and cycling in the settlement. At present poor footpath infrastructure in the sites immediate context discourages pedestrian and cyclists in the area. This is most evident in that the existing bus stop to the west of the R617 is not currently served by a footpath. The proposed upgrades to the R617 in addition to the proposed mix of uses will facilitate increased levels of sustainable methods of travel in Tower/Cloghroe, increase access to public transport opportunities and reduce car dependency.

Key outcomes for walking in the strategy include:

- An increase in walking levels for work, education and leisure across the CMA, particularly for short journeys (less than 2-3km);
- Addressing the safety issues and barriers that prevent citizens and visitors from walking more in Cork;
- Supporting a high quality and fully accessible environment for all abilities and ages by continuing to develop a safe, legible and attractive public realm;
- Facilitate walking's role as part of linked trips, particularly with rail and bus journeys; and
- Promote a far higher standard of urban design in new developments, and in highway design, in a fashion that consistently prioritises pedestrian movement and safety over that of the private car.

The proposed development has been designed accordingly to facilitate walking and cycling as primary modes of travel to and from the proposed scheme. As stated in the ABP Opinion, the applicants have consulted on the scope of the proposed works to the R617 (Cloghroe – Blarney Road) with the Traffic & Transport Section at Cork City Council. The applicants have obtained a letter of consent from Cork City Council to carry out the subject works to the which are contained within the red line boundary.

The proposed works include dedicated pedestrian and cycle paths along the subject site's eastern boundary. This has been accommodated as part of the proposed development and the proposed footpath will tie in with the existing footpath network in the settlement which currently terminates at the entrance of the Senandale residential development to the south.

These interventions will also result that the proposed relocated bus stop will be served by dedicated and high-quality pedestrian and cycle lanes. Tower/Cloghroe is identified on the Bus Connects route in CMATS and an allowance has been made for a future bus corridor along the site's roadside boundary.

The location and form of the proposed pedestrian signalised toucan crossing to the northeast of the site will provide existing and future residents of the settlement with convenient access between the subject site and the town centre to the northeast. The proposed signalised crossing is appropriately located in the context of the existing pedestrian crossing adjacent to Cloghroe Church.

	<p>The proposed interventions to the R617 will assist in urbanising the streetscape and ensure a safer and more appropriate road network given the sites urban setting</p>
<p>The R617 has been identified as a ‘Secondary’ cycle route on the Cycle Network Map of CMATS. The Secondary Cycle Network is described in CMATS as</p> <p><i>“The secondary route network provides connections from residential areas and areas of employment to the primary network. They comprise of a combination of off-road cycle routes, cycle lanes, shared bus and cycle lanes and traffic-calmed roads. They often run parallel to primary routes, providing an alternative link.”</i></p>	<p>In accordance with CMATS, a dedicated 2m cycle track has been provided along the sites eastern roadside boundary.</p>

2.5 Local Planning Policy

2.5.1 Local Policy Context

The Local Planning Policy context is currently in transition. The proposed development site, which was formerly within the functional area of Cork County Council, is now located within the recently expanded Cork City Council administrative area, following the boundary extension of May 2019. In accordance with subsection 30 (1) of the Local Government Act 2019 which gave effect to the boundary extension:

“The development plan in force immediately before the transfer day in respect of the functional area of the county council shall, on and after that day, continue to apply in respect of the relevant area until the next making of a development plan by the city council in respect of the functional area of the city council in accordance with section 9 of the Act of 2000.”

As a new City Development Plan has yet to be made, the zoning and policy objectives for the site continue to be those set out in the Cork County Development Plan 2014. Similarly, the lands are covered by the Blarney Macroom Municipal District Local Area Plan and, as stated in subsection 30 (2) of the Local Government Act:

(2) Subject to paragraph (b) of subsection (4) of section 18 of the Act of 2000, any local area plan in force immediately before the transfer day in respect of an area within the relevant area shall, on and after that day, continue to apply to the first-mentioned area until the next making of a local area plan by the city council in respect of the first-mentioned area in accordance with the said section 18.

The Blarney Macroom Municipal District Local Area Plan remains in force for the area until such time as a new Local Area Plan is adopted by Cork City Council.

2.5.2 Cork County Development Plan 2014

The Cork County Development Plan (CDP) outlines policies and objectives for housing development in County Cork. The Plan is underpinned by a number of key principles which include sustainability, social inclusion, high quality design and climate change adaptation.

The Plan establishes a hierarchical network of settlements in the County, allocating related population and housing growth projections. Chapter 2 of the Plan outlines the Core Strategy for the County over the lifetime of the Plan. The strategy identifies a hierarchy in the network of settlements and divides the County into different strategic areas to focus growth in appropriate locations and ensure a sustainable, plan-led future for Cork.

The site is situated within the 'key village' of Tower in the CDP's Network of Settlements and the County Metropolitan Cork Strategic Planning Area' identified in the Core Strategy Plan:

Policy	Consistency with Scheme
<p>Objective CS 3-2 of the CDP outlines strategic aims for lower order settlements including key villages and seek to:</p> <p><i>“Establish key villages as the primary focus for development in rural areas in the lower order settlement network and allow for the provision of local services, by encouraging and facilitating population growth at a scale, layout and design that reflects the character of each village, where water services and waste water infrastructure is available. Supporting the retention and improvement of key social and community facilities and inter urban public transport.”</i></p>	<p>The proposed development will assist Tower in fulfilling its strategic function as a 'Key Village' in the CDP. The proposed residential development is of an appropriate scale given its proximity to a high frequency suburban bus route scale and is comparable to a number of existing residential estates in Tower, including, Willison Park (circa 160 no. units) Gleann na Ri (circa 130 no. units), Laureston (circa 90 units), Riverview (80 units) and Oakmount (80 units).</p> <p>The proposed retail and commercial uses in the southern areas of the site will serve as important communal outlets to existing and future residents of the settlement, particularly those residing in the southern areas of the town. The growth of the commercial environment In Tower will be a welcome boost to the local economy and assist the settlement in achieving its strategic function as a key village settlement.</p>
<p>Objective CS 4-1: County Metropolitan Cork Strategic Planning Area:</p> <p>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.</p>	<p>The proposed development will contribute towards achieving the strategic aims of the County Metropolitan Cork Strategic Planning Area by providing high quality housing along the existing public transport corridor which will promote sustainable commuting patterns.</p>
<p>Objective HOU 3:1: Sustainable Residential Communities</p> <p>a) Ensure that all new development within the County supports the achievement of sustainable residential communities. The</p>	<p>The proposed development promotes sustainable residential communities both in its layout and its location relative to public transport opportunities and existing town centre uses. As evidenced in sections 3.2 and 3.3 of this statement, the proposed development has been designed in accordance with the policies and objectives of the</p>

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.

- b) Promote development which prioritises and facilitates walking, cycling and public transport use, both within individual developments and in the wider context of linking developments together and providing connections to the wider area, existing facilities and public transport nodes such as bus and rail stops.
- 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.

Guidelines on Sustainable Residential Development in Urban Areas and the Urban Design Manual. The proposed SHD, which provides for additional residential accommodation in tandem with the growth of the existing retail/commercial environment at the town on a regular public transport route, reflects the appropriate expansion of the settlement going forward.

The proposed development places a strong emphasis on cyclist and pedestrian mobility both within the site and within the context of the wider settlement of Tower. The proposed development utilises desire lines within the site ensuring a direct and accessible environment for pedestrians and cyclists alike. Shared surfaces and raised tables are provided for at key internal junctions to ensure that vehicles give way to pedestrians within the scheme.

Upgrades to the R617 which include the provision of dedicated cycle lane, footpath, pedestrian crossing and relocated bus stop will ensure that sustainable and safe connectivity throughout the settlement. The provision of a footpath along the eastern boundary and integration with the existing footpath network in the settlement will provide a significant planning gain to all existing residents in the settlement and enhance and promotes sustainable and safe mobility patterns in Tower/Cloghroe.

Objective HOU 3:2: Urban Design

- 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.
- b) Provide additional guidance, including principles and policies, on urban design issues at a local level, responding to local circumstances and issues. Where appropriate Local Area Plans will consider the need for the provision of additional guidance in the form of design briefs for

As evidenced in this statement 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. A comprehensive Architectural Design Statement prepared by Deady Gahan Architects accompanies this submission which addresses the proposed developments compliance with the 12 criteria in the Urban Design Manual.

Cork County Council's Design Guide for Residential Estate Development is based on the National Guidance as referenced above so it is considered that the proposal complies with the Council's guidance. A Statement with DMURS compliance prepared by MHL & Associates accompanies this submission which addresses compliance with DMURS.

important, sensitive or large scale development sites.

- c) 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 Development Plan with regard to the creation of sustainable residential communities.
- d) Require developers to take account of the Design Manual for Urban Roads and Streets (DMURS).

Objective HOU 3:3: Housing Mix

- 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.
- 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.

The proposed housing mix provides for a variety of house types and sizes and is in accordance with the guidance contained in the Joint Housing Strategy and the Guidelines on Sustainable Residential Development in Urban Areas.

Objective HOU 4-1 Housing Density on Zoned Land

Identifies that 'Medium B' density development (12-25 units per hectare) are normally applicable in settlements of under 5,000 no. people with the following comments included.

- Max Net Density extended to 35 dwellings/ha in smaller towns outside Metropolitan Cork.
- Normally applicable in smaller towns (less the 5,000 population).
- Can be applied in larger towns through LAP's where there is a requirement to broaden the range of house types.
- Densities between 25 and 35 dwellings/ha will be considered where an exceptional market requirement has been identified.
- Must connect to public water and waste-water services.

A Material Contravention Statement prepared by HW Planning accompanies this application which addresses the material contravention of objective HOU 4-1. The proposed development represents a density of 35 units per hectare of the residential developable site area. Objective HOU 4-1 provides scope for the provision of densities between 25-35 units per hectare in instances where an exceptional market requirement has been identified. However, as detailed in this statement, Tower has outperformed its projected housing delivery identified in the 2017 LAP of 182 no. units, with 203 no. dwellings either under construction or completed since the LAP was adopted. A further 21 no. dwellings have been permitted with construction not yet commencing.

The Material Contravention Statement confirms that the proposed density is consistent with objectives of the NPF, RSES, Apartment Guidelines 2018 and SRDUA and that the Board may to decide to grant permission for the proposed development, notwithstanding the material

- Broad housing mix normally required including detached/serviced sites unless otherwise specified in relevant Local Area Plan.

contravention of the density and population allocation provisions of the Development Plan.

Objective SC 1-1: Social and Community Infrastructure Provision

- a) Support the provision of social and community facilities which meet the current and future needs of the entire population.
- b) Secure lands for social and community facilities and encourage the provision of facilities suitable for intergenerational activities, which are accessible to all members of the community, through initiatives in partnership with community groups and sporting organisations.

The proposed residential development provides for a number of high quality, communal and public open spaces which will serve as natural focal points for the new community. In particular the proposed 'central parkland' will serve as an excellent visual and recreational amenity for future residents and visitors to the development. The landscape strategy for the site provides for formalized and more natural public open spaces and communal areas scattered throughout the site. These areas are linked by a series of amenity walks and footpaths ensuring that all dwellings within the development have convenient and high-quality public spaces at their doorstep and support sustainable place making and social interaction within the development.

Elsewhere, the proposed urban plaza to the east of the proposed retail unit will provide a high-quality urban space currently lacking in the settlement. The location of this urban plaza facing directly onto R617 will provide active frontage on the streetscape and strengthen the presence of the Cloghroe Neighbourhood Centre at both sides of the R617.

Full details of the proposed recreational amenity and social and community infrastructure proposed are contained in the accompanying plans prepared by Forestbird Design.

Objective SC 2-1: Multi - Use Community Facilities

- Support the provision of Multi - Use Community Facilities which encourage sharing amongst community groups and are designed for multi-use activities and future sharing.

Objective 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.

A 42-child place crèche has been provided as part of the proposed SHD at the most appropriate location for a creche from an operational perspective adjacent to the R617, but also from future sustainability perspective as it will form part of the expanded Cloghroe Neighbourhood Centre. A creche at this location is also within a short walking distance from Cloghroe National School which will be beneficial for families with young children. It is considered that this is sufficient to cater for childcare needs in the development.

A Childcare Needs Assessment prepared by HW Planning accompanies this application which provides full details of engagements with Cork County and Cork City Childcare Committees.

Objective SC 4-1: Educational Facilities

- Facilitate the provision of educational services in the community such as schools, crèches and other educational and childcare facilities. Multi-use facilities which can accommodate both educational and childcare facilities are also encouraged.

Objective SC 5-2: Quality Provision of Public Open Space

- 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”.
- 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.

Objective SC 5-5: Recreation and Amenity Policy

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) and Green Infrastructure – New Developments (GI 3-1).

Objective SC 5-8: Private Open Space Provision

- Apply the standards for private open space provision contained in the Guidelines on Sustainable Residential Development in

The proposed development has been designed in accordance with the Council’s Recreation & Amenity Policy and all other planning policy documents. Appendix A of the Council’s policy relating to recreation and amenity space recommends that in any development usable open space should amount to 12% - 18% of the site area. The percentage of open space provision should increase as the density of the development increases. Of the residential developable site area (5.6 hectares), 16% is reserved for public open space. and 14% for useable public open space

The wider recreation, amenity and public open space strategy for the site includes a large central parkland, wooded area and urban plaza to the south of the site. A series of amenity walks and footpaths ensure that all public open space areas within the development are accessible with the existing drains/streams within the site providing opportunities for green infrastructure and biodiversity corridors which are maximized within the proposed layout.

The proposed development is consistent with the requirements of the Council’s Recreation and Amenity Policy and has regard to the Council’s Policy regarding the management of Green Infrastructure assets. As referenced previously, and comprehensively detailed in the Landscape Plans submitted with the planning application, the proposed development seeks to capitalise on the presence of existing streams on site by incorporating these as recreational and amenity assets within the site. The proposed planting and other landscaping measures promotes biodiversity within the site.

Private open space provision for dwellings is in accordance with standards and guidance outlined in the documents referenced. Every house is designed to have useable private garden space to the rear and private space to the front which will provide car parking, all apartments

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.

have private amenity space in excess of the minimum areas set down in the Sustainable Urban Housing, Design Standards for New Apartments.

Objective SC 7-3: Accommodation for Older Persons

Establish policy and targets in relation to the provision of residential care, assisted living, group/community housing and other forms of accommodation for older persons with regard to location and requirements.

The proposed three-storey apartment block situated immediately north of the retail unit has been specifically designed as a step-down block, primarily targeted at elderly people wishing to downsize from their current accommodation. It is acknowledged that there is a deficit in this type of accommodation in the area. The subject site represents an appropriate location for such step-down units with regular public transport opportunities available and proposed convenience retail provision on their doorstep. Additionally, the site's location proximate to the Cloghroe Neighbourhood Centre containing the local church, post office and hairdressers/beauticians will promote independent living and an attractive area for those wishing to downsize in the area.

Objective TCR 4-1: Retail Hierarchy

Facilitate a competitive and healthy environment for the retailing industry into the future which provides for adequate choice in appropriate locations whilst ensuring that future growth in retail floorspace is broadly in line with the identified Retail Hierarchy set out in Table 7.1.

Regarding these areas Objective TCR 4-9 states:

To support, promote and protect neighbourhood centres and large village centres and which play an important role in local shopping for residents and provide a range of essential day to day services and facilities.

Table 7.1 also states regarding Neighbourhood Centres and Large Villages centres'

"Opportunities for development of new neighbourhood centres will be identified in the Development Plan or Local Area Plans as appropriate where significant additional population growth is planned or where gaps in existing provision are identified."

It is noted that the provision of additional retail floorspace in Tower is in accordance with key principles of retail policies in the CDP. Specifically, objective TCR 4-1 which aims to 'facilitate a competitive and healthy environment for the retailing industry' and TCR 4-9 which aims to consolidate the role of neighbourhood centres in urban settlements.

Table 7.1 of the CDP promotes opportunities for the expansion of Neighbourhood Centres, such as Cloghroe, where population growth is envisaged and where there are gaps in provision of services or uses. As demonstrated in the accompanying Retail Impact Assessment prepared by HW Planning there is currently a deficit of retail floorspace serving the catchment of Tower. The delivery of the proposed retail development will assist in consolidating Cloghroe Neighbourhood Centre as an important local node and allow required retail floorspace growth in tandem with planned population growth.

Objective TCR 11-1: Aligning Retail Development and Transport

- a) **Promote and support retail (and town centre development) which is in line with national transport policy on Smarter Travel and seeks to make town centres/retail locations as attractive and accessible as possible by public transport, cycling and walking in particular.**
- b) **For significant developments and/or proposals in more outlying areas the council may request specific Smarter Travel Plans which adequately establish the connectivity of the proposal to adjoining large population and town centres.**
- c) **Promote Mobility Management Measures through Local Area Plans that both improve accessibility of town centre and retail areas while aiming to develop a pedestrian and cyclist friendly urban environment and street life.**

The location of the subject site adjacent to a regular public transport route is consistent with TCR 11-1 seeking to align retail development sustainable transport modes. The proposed public realm works and upgrades to the R617 including the provision of dedicated cycle and footpaths and relocation of the existing bus stop will all assist in ensuring that the proposed retail development will be easily accessible on bike, foot and by bus.

Objective TM 2-1: Walking

- a) **Encourage and facilitate a safe walking route network and a culture of walking where possible and practical.**
- 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.**
- 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.**

The proposed development promotes walkability and pedestrian movements within the site and within its wider context in joint settlements of Cloghroe/Tower. The Connectivity Map prepared by HW Planning (Appendix B) illustrates how the site will function within its overall context.

The proposed upgrades to the R617 which includes the provision of a 2m footpath along the sites eastern roadside boundary will greatly assist in pedestrian mobility in the settlement. Currently, there is a distinct disconnect between the twin settlements of Tower and Cloghroe which is exacerbated by the poor footpath infrastructure in the area. At present, the footpath infrastructure to the west of the R617 terminates at the entrance of the Senandale residential development to the south and the northern side of the cul de-sac to the north of the site. This means that the bus stop for the no. 215 bus route is not served by a dedicated footpath. While a footpath does exist along the opposite side of the R617, it does not appear to be of sufficient width, and the junction of the R617 with the Fairways residential development represents a significant gap in providing a continuous footpath link between the two settlements.

One of the many beneficial aspects of the proposed development for the wider community will be the provision of a continuous footpath along the site's eastern boundary tying in with the existing footpath network in the settlement. This will significantly improve the pedestrian environment and connectivity within the settlement and ensure that the bus stop is safely accessible. The proposed alterations along this road will assist in promoting walking as an attractive, safe and convenient method of transport and provide access to key destinations in the settlement. In particular it will assist in providing a high-quality pedestrian link between the more populated areas of Tower and Cloghroe National School. A recently installed pelican/pedestrian crossing has been installed to the south of the site at Cloghroe Church, ensuring that pedestrians will have safe and convenient access to Cloghroe Neighbourhood Centre and National School to the south. The development therefore proposes strong links to existing and new routes and places where people will want to get to and from.

The proposed layout provides for a permeable and integrated network of internal roads, footpaths and amenity walks providing for a legible and accessible layout for pedestrians which link the open spaces and communal areas within the development.

Objective 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.**
- 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.**
- 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**

As referenced in the response to 'Objective TM 2-1: Walking' the existing road network in Tower is not sufficiently conducive with safe and convenient environment for cyclists. The R617 is identified as secondary route BT-U1 on the 'Cork Cycle Network Plan' with the proposed infrastructure along the route being:

'This is proposed as a secondary route providing on-road cycle lanes or a segregated cycle track if possible.'

The proposed development provides for a dedicated 2-metre cycle path along the sites roadside boundary facilitating safe cyclist movement and consistent with CMATS and the Cork Cycle Network Plan. The streetscape design will ensure that requirements of cyclists and all sustainable modes of transport will be catered for in line with provisions outlined in DMURS. Bicycle parking facilities will also be provided to serve the proposed apartment units, creche and commercial units to the south.

Roads & Streets (DMURS) is a useful guidance tool.

- 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.

Objective TM 2-3: Bus Transport (County-Wide)

The County Council will support and prioritise the following key Bus Transport initiatives:

- a) Progress towards national targets for modal split. Encourage the further development of the bus network.
- b) Ensure all new developments are well connected to their local bus networks.
- c) Secure the provision of appropriate bus infrastructure as an integral part of new development.
- d) Secure safe walking routes from all new development to the local bus network.

The site is well positioned to capitalise on various regular bus routes in the area. Cloghroe/Tower is served by the following bus services:

No. 215 – Cloghroe – Jacobs Island (Via Tower, Blarney, Blackpool, City Centre, Mahon Point). –

- Service 7 days a week
- Mon -Fri - Service every 30 minutes - First Bus @ 6.45am – last bus 23.30pm
- Sat – Service every 30 minutes - First Bus @ 7.30am – last bus 23.30pm
- Sun – Service every 45-60 mins – First bus @ 8.30am – last bus 23.30pm

As there are no previous stops on the 215 no. Cloghroe – Jacobs Island route, it likely empty once stationed at the Coolflugh (Cloghroe) bus stop. In advance of preparation of this application, the National Transport Authority (NTA) were contacted regarding the capacity of the existing 215 no. route. As detailed in the accompanying email correspondence with the NTA (Appendix C of accompanying Material Contravention Statement), the 215 no. route is currently served by bus, which has a normal capacity of 76 no. seated passengers and 15 no. standing passengers. As the 215 no. route operates 2 no. services every hour, approximately 180 no. bus spaces are available from the Coolflugh (Cloghroe) bus stop every hour.

No. 233 – Cork – Macroom (via Coachford)

- Service Mon – Sat
- 1 no. service a day

No 235 – Cork – Rylane (via Donoughmore)

- Service Mon – Fri
- 1 no. service daily

The village is served by two bus stops: Cloghroe Fairways/Coolflugh Terminus which is adjacent to the subject site and serves the 215-no. route. A second bus

stop accommodating the infrequent 233 and 235 routes is situated to the south of Cloghroe Church. The proposed development will improve the viability of local bus services.

Objective TM 3-3: Road Safety and Traffic Management

- a) 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.
- b) Support demand management measures to reduce car travel and promote best practice mobility management and travel planning via sustainable transport modes.
- 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.
- d) Ensure that all new vehicular accesses are designed to appropriate standards of visibility to ensure the safety of other road users.
- 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.
- f) Promote road safety measures throughout the County, including traffic calming, road signage and parking.
- g) Coordinate proposed zoning designations and/or access strategies in settlement plans with speed limits on national roads.

The proposed development will considerably enhance road safety along the surrounding road network and particularly improve the relationship between motorists, pedestrians and cyclists. The provision of designated cycle and pedestrian infrastructure, reduction in vehicular speeds and traffic calming proposals will allow all methods of transport to co-exist and promote sustainable methods of travel.

The TTA submitted with the planning application assessed 3 no. agreed key junctions in the vicinity of the site and confirms that the local road network has capacity to accommodate the increased traffic generated from the development.

A Mobility Management Plan prepared by MHL & Associates Consulting Engineers accompanies this application which details how journeys to and from the site will be focused on public transport, walking and cycling.

A Statement of Consistency for Traffic and Transportation/DMURS Compliance prepared by MHL & Associates accompanies this application which demonstrates that the proposed development is consistent with DMURS and will improve road safety and traffic management in the area.

Objective TM 4-1: Car and Cycle Parking

- a) Encourage a gradual shift towards more efficient and sustainable transport modes by securing the delivery of parking spaces required in connection with new development broadly in line with Appendix D Parking and Cycling Standards.

The proposed development provides for 2 no. parking spaces for the majority of proposed dwelling houses. 20 no. 2-bedroom townhouse units have been provided with 1 no. parking space to promote pedestrian and cyclist mobility and reduce car dependency.

For the proposed 2 and 3 bedroom apartment/duplex units, 1 no. space per unit is proposed with 0.5 spaces for each 1 bed unit. 11 no. car parking spaces are proposed to

- b) Ensure that on-street car parking is designed such that it does not occupy unnecessary street frontage.
- h) 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:
 - Respects the character of the streetscape/landscape
 - Will not adversely affect visual amenity, and
 - Provision has been made for security, and the direct and safe access and movement of pedestrians and cyclists within the site.
- i) 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.

serve the stepdown units which are aimed at elderly residents. It is considered this niche form of accommodation requires reduced car parking spaces as residents will be able to avail of local services such as post office, newsagent, beauticians church and other local amenities on foot (Cloghroe Neighbourhood Centre) or via public transport. The proposed parking spaces are mostly grouped in shared surfaces/plazas. The aim is to create an enjoyable public space.

A full breakdown of the proposed car parking spaces of the proposed development is illustrated on drawing no. 20068/P014 prepared by Deady Gahan Architects. (Appendix A).

The application is accompanied by a Material Contravention Statement prepared by HW Planning which addresses the material contravention matter relating to car parking for the proposed scheme.

Objective WS 3-1: Wastewater Disposal

- a) Ensure implementation of the South Western River Basin Management Plans and their associated programmes of measures.
- 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 waste water infrastructure is provided.
- c) Ensure that proposals for development incorporating smaller treatment systems align with the Guidance manual on treatment Systems for Small Communities, Business, Leisure Centres and Hotels published by the EPA or other appropriate guidance.
- d) Any new developments in the County disposing of effluent to ground will be required to comply with the groundwater

It is proposed to connect with the existing waste-water treatment system in the area. Irish Water has issued a Statement of Design Acceptance regarding the proposed development.

In order to accommodate the proposed connection, upgrade works to the existing pumps are required at the Cloghroe Wastewater Pumping Station to the south of Cloghroe Church. Irish Water has confirmed that following the upgrades to the pumping station, the public wastewater network will have sufficient capacity to adequately process the additional input from the proposed development, when constructed and occupied/operational.

protection plan and the Waste Water Discharge Regulations.

Objective WS 4-1: Water Supply

- a) Prioritise the supply of adequate drinking water for the resident population and invest and expand the water supply where possible in line with future population targets.
- b) Ensure that all drinking water in the County complies with the European Union Drinking Water Directive 98/83/EC and that all surface water and ground water supplies comply with the requirements of Surface Water Directive 75/440/EC and Ground Water Directive 80/68/EEC.
- c) Conserve sources of drinking water and minimise threats to either the quality or quantity of drinking water reserves that might result from different forms of development or development activity and other sources of pollution.

Irish Water has confirmed that there is sufficient capacity in the existing water network to accommodate the proposed development. Refer to Engineering Design Report prepared by MHL & Associates.

Objective WS 5-1: Surface Water and SuDS

Ensure that all new developments incorporate sustainable drainage systems (SuDS).

The proposed surface water drainage strategy is in accordance with Sustainable Urban Drainage Systems (SUDS). Each proposed attenuation system is designed with a controlled flow rate of less than the greenfield run-off rate for the catchment area. This results in an overall discharge from the site of 20.8 l/s which is less than the greenfield run-off of 25.29 l/s. The attenuated systems will ultimately discharge into the Owennagearagh River via the public storm sewer present on the R617. The proposed drainage strategy has been designed for a storm return period of 1 in 100 year with a 20% climate change factor.

The proposed drainage basins/wetlands within the central amenity area will serve as natural surface water drainage features within the scheme.

Objective WS 6-1: Flood Risks – Overall Approach

Take the following approach in order to reduce the risk of new development being affected by possible future flooding:

- Avoid development in areas at risk of flooding; and

Flood risk and drainage considerations have been a critical design consideration for the proposed development. A core principle of the proposed development is to permanently protect the Senandale residential development from any future flooding events from the western boundary stream and not to negatively impact the development potential of the lands to the adjoining lands to the west.

- Where development in floodplains cannot be avoided, to take a sequential approach to flood risk management based on avoidance, reduction and mitigation of risk.

In areas where there is a high probability of flooding - 'Zone A' - it is an objective of this plan to avoid development other than 'water compatible development' as described in Section 3 of 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' issued in November 2009 by DoEHLG.

In areas where there is a moderate probability of flooding - 'Zone B' - it is an objective of this plan to avoid 'highly vulnerable development' described in section 3 of 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' issued in November 2009 by DoEHLG.

Implement the recommendations of the South Western CFRAM study.

Objective 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.

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

The accompanying SSFRA report, which includes detailed hydraulic modelling, and Engineering Design Report provide a comprehensive analysis of flood risk/surface water management of the proposed. Although the subject lands are not situated within a Flood Risk Zone, areas to the south and west of the lands are contained within Flood Zones A and B.

As detailed in the SSFRA report, a consequence of protecting Senandale from future flooding events from the boundary stream and diverting conveyance flows to the west is that there will be a small increase in water levels (up to 20mm for the 0.1%AEPC event) over a very localised region on the adjoining lands to the west. The proposed SHD development will have no impact on these lands, which will remain Flood Zone A and continue to fulfill a flood storage function. The potential increase in water levels of 20mm in this area will not have any impact on the proposed access road or the development potential of the lands to the west (currently subject to planning reference 21/40620) and is consistent with the development strategy for these lands for flood storage purposes.

The flood risk investigations confirm that the proposed flood mitigation/drainage measures will have positive impacts on the wider settlement of Tower/Cloghroe. Specifically, the proposed compensatory flood storage, headwall with non-return valve at southern boundary land drain, and attenuated surface water drainage system will remove the risk of flooding occurring within the site and protect the Senandale residential development to the south from future flood events generated from the existing western boundary stream.

As confirmed in the accompanying SSFRA report, the proposed development satisfies criteria of the Development Management Justification Test as identified in the Flood Risk Management Guidelines.

The proposed development also satisfies relevant criteria within objective WS 6-2 of the CDP where it states that *"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."*

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:
 - Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
 - Comprises significant previously developed and/or under-utilised lands;
 - Is within or adjoining the core of an established or designated urban settlement;
 - Will be essential in achieving compact and sustainable urban growth; and
 - 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.

The development is assessed not to have the potential to give rise to negative or adverse impacts on the integrity of Natura 2000 sites.

As described in the SSFRA report, the flood storage and drainage strategy of the proposed development will ensure that dwellings in Senandale will be protected from potential future flooding events resultant from the western boundary stream. The proposed development will not result in any increase in flood risk of any existing dwellings in the vicinity.

Objective 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 seminatural 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.

Objective HE 2-5: Trees and Woodlands

- c) 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

One of the key factors of the proposed development is the protection and enhancement of biodiversity and the natural environment. Where possible, existing boundaries have been retained, utilised and integrated where possible into the design proposals.

The proposed planting schedule, central parkland/ wetlands will all positively contribute to biodiversity within the scheme. As with any construction project of this scale, there will be a loss of existing trees on site, particularly within the wooded area to the east of the site to accommodate underground attenuation tank. However, it is proposed to plant a new woodland in this area once the attenuation infrastructure is in place resulting in a long-term positive with a mixed native woodland proposed for this area. The proposed development achieves a balance of maximizing the development potential of the site, while also facilitating and enhancing biodiversity.

or any tree(s) that warrants an order given its important amenity or historic value.

Objective HE 3-1: Protection of Archaeological Sites

- a) Safeguard sites and settings, features and objects of archaeological interest generally.
- b) Secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments including the Sites and Monuments Record (SMR) (see www.archeology.ie) and the Record or Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, as amended and of sites, features and objects of archaeological and historical interest generally.

In securing such preservation, the planning authority will have regard to the advice and recommendations of the Department of Arts, Heritage and Gaeltacht as outlined in the Frameworks and Principles for the Protection of the Archaeological Heritage.

There are no recorded archaeological/historical monuments within the subject site. The closest archaeological monument is a Fulacht Fia approximately 180m northwest of the subject site.

Chapter 11 of the accompanying Environmental Impact Assessment Report (EIAR) assesses all aspects relating to cultural heritage and concludes that the proposed development will not result in any significant impacts regarding archaeological sites.

Regarding residual impacts on potential archaeological/cultural sites Chapter 11 of the EIAR predicts that all potential archaeological impacts will be addressed by mitigation during the pre-construction phase, which will provide for the recording and/or avoidance of any potential sub-surface archaeological features that may exist. As a result, no residual impacts on the archaeological resource are predicted.

Objective 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.
- b) Promote sustainable approaches to housing development by encouraging new building projects to be energy efficient in their design and layout.
- 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 promotes the added economic, amenity and environmental value of good design.
- 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.

The layout, materials and design of the proposed buildings are in accordance with Objective HE 4-6. The dwellings and apartment blocks have been designed to be as energy efficient as possible and to maximize solar gain. The modern approach of building design compliments the existing character of the area.

The innovative approach to dealing with the difficult topographical issues regarding varying degree of slope will assist in providing a contemporary and sustainable residential development which integrates well with the surrounding environment. The form of certain buildings was designed accordingly to fit in seamlessly with the differing levels in the contours on the site.

A Building Lifecycle Report prepared by Aramark accompanies this application.

Objective GI 6-1: Landscape

- a) **Protect the visual and scenic amenities of County Cork's built and natural environment.**
- b) **Landscape issues will be an important factor in all landuse 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.**
- c) **Ensure that new development meets high standards of siting and design.**
- d) **Protect skylines and ridgelines from development.**
- e) **Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.**

The proposed layout has been designed to have as minimal impact as possible on the surrounding landscape and from sensitive receptors in the vicinity of the site. The proposed landscape strategy has had full regard to the sites topography and internal level differences.

A comprehensive Landscape and Visual Assessment/Strategy prepared by Forestbird Design accompanies the application/EIAR and addresses the site's location within /adjacent to the sites landscape and visual context. Chapter 4 of the EIAR 'Landscape & Visual' includes photomontages and CGIs, prepared by G-Net, which capture the proposed developments setting in the local context.

The proposed development will result in the creation of a strong urban feel along the site's road frontage while also enhancing biodiversity and providing attractive and expansive landscape and visual amenities for future residents. The proposed central parkland provides a high-quality landscape feature within the development in addition to public open spaces and recreational areas. Although the loss of some trees within the development is inevitable, the proposed planting of a native woodland to replace the required removal of trees will result in a long-term positive impact for the area and enhance the visual amenities of the area.

Objective ZU 2-2: Development Boundaries

For any settlement, it is a general objective to locate new development within the development boundary, identified in the relevant Local Area Plan that defines the extent to which the settlement may grow during the lifetime of the plan.

Objective ZU 3-1: Existing Built Up Areas

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.

The subject lands are defined as being within the development boundary and existing built-up area of Tower in the Blarney Macroom Municipal District Local Area Plan 2017 and is in accordance with objectives ZU 2:2 and ZU 3:1.

Appendix D – Parking and Cycling Standards

Table 1a: Car Parking Requirements for New Development (Maximum per sqm)

- **Convenience Retail – 1 space per 20 sqm**

As requested in item 9 of the Boards Opinion, a rationale and strategy for the proposed car parking provision is contained in the accompanying drawing no. 20068/P014 prepared by Deady Gahan Architects and Material

- Restaurants, cafes & takeaways – 1 space per 5 (net sqm)
- Creches - 1 space per 3 staff + 1 space per 10 children.
- Residential - 2 spaces per dwelling 1.25 spaces per apartment

Table 2 – Cycle Parking Requirements for New Development (Minimum per sqm)

- Convenience Retail – 1 space per 100 sqm
- Restaurants, cafes & takeaways – 1 space per 200 sqm
- Creches – 1space per 4 staff
- Residential 0.5 spaces per unit (1-2 bed apartment) 1 space per unit (3+ bed apartment)

Contravention Statement prepared by HW Planning. (Appendix A).

The proposed development consists of a surface car park of 101 no. spaces serving the proposed extension to Cloghroe Neighbourhood Centre to the south of the site. In accordance with maximum standards identified in Table 1a of the CDP the proposed retail unit (1,895 sqm) reflects a maximum car parking requirement of 95 no. spaces while the proposed café (155 sqm net) reflects a maximum requirement of 31 no. spaces. Given the site's location within walking distance of all areas in the settlement and its public transport links, it is considered that the proposed car parking provision of 101 no. spaces is appropriate. The proposed 42 no. child creche provides for 9 no. car parking spaces which is consistent with the standards identified in Table 1a.

The proposed development provides for 18 no. bike spaces for the proposed retail unit in accordance with the standard identified in table 2. The proposed development provides for 8 no. bike spaces to serve the proposed café and 2 no. first floor apartment. The proposed creche will be served by 12 no. bike spaces.

As referenced previously in this Statement of Consistency, a Statement of Material Contravention prepared by HW Planning accompanies this application. The Statement of Material Contravention relates, *inter alia*, to car parking for the residential element of the proposed development. While maximum standards are assigned for the majority of development types, the residential standards are set as minimum values as follows:

- Dwelling House – 2 spaces per dwelling
- Apartments – 1.25 spaces per dwelling

Note 4 under Table 1a states that:

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

Parking for the proposed houses within the scheme is generally 2 spaces per house as specified in Appendix D of the CDP, with the exception of 20 no. 2 bedroom

townhouses located in Area B of the scheme which have been provided with 1 no. space.

Parking for the proposed apartments have been allocated on the basis of 1 space per unit for 2 and 3 bedroom duplex apartments and 0.5 space per unit for 1 and 2 bedroom ground floor units. This is below the minimum requirement of 1.25 spaces per apartment specified in the Development Plan.

The Material Contravention Statement confirms that the proposed car parking provision is consistent with objectives of the NPF, RSES and Apartment Guidelines 2018 and that the Board may to decide to grant permission for the proposed development, notwithstanding the material contravention of the provisions of the Development Plan identified Table 1a, of Appendix D of the CDP.

2.5.3 Blarney Macroom Municipal District Local Area Plan 2017

Tower is identified as a 'key village' in the Blarney Macroom Municipal District Local Area Plan 2017-2023 (LAP) with the site included within the settlement's development boundary. Paragraph 4.8.1 stating the vision for the settlement is to;

“encourage the consolidation of the village within its rural setting, to protect and enhance the range of community facilities and commercial facilities within the village and to promote sympathetic development in tandem with the provision of services.”

The maximum growth for Tower is set out in section 4.8.7 of the LAP, as follows:

“Over the lifetime of this plan, it is envisaged that the key village of Tower will develop in a manner that makes the best use of the available infrastructure in the area. Given the difficulties that exist in relation to topography and the lack of an appropriate range of services, it is considered that a maximum growth of approximately 182 units would represent a more sustainable level of growth for Tower over the lifetime of this plan.”

The lifetime of the plan is 2017 to 2023.

Policy	Consistency with Scheme
<p><u>LAP Objective GO-01 General Objectives for Key Villages</u></p> <p>a) Within the development boundary of the key villages it is an objective to encourage housing development on the scale set out in Table 4.1 in the period 2015-2023.</p>	<p>The subject site is situated within the development boundary for Tower and will contribute 198 no. residential units and an expansion of the towns retail sector.</p> <p>As referenced previously, Tower has performed comparably well with other settlements in terms of permitted residential units. Since the adoption of the 2017 Local Area Plan, 224 no. residential units have been granted permission (203 of which are either completed or currently under construction) in the settlement. A further</p>

Name	Existing Number of Houses Q1 2015 (Geodirectory)	Growth 2005 to 2015 (Geodirectory)	Overall Scale of New Development (No. of houses)	Normal Recommended Scale of any Individual scheme*
Ballineen/Enniskeane	344	44	195	20
Ballingeary	96	18	60	15
Ballymakeery/ Ballyjourney	260	82	45	15
Coachford	181	23	116	20
Grenagh	217	70	150	36
Kilumney/ Ovens	476	261	251	50
Tower	1161	130	182	40
Total Key Villages	2735	-	999	

*The normal recommended scale of any individual scheme is set out in the above table. Individual schemes in excess of the recommended scale set out in the above table may be considered where it is demonstrated that the overall scheme layout reinforces the existing character of the village and the scheme is laid out, phased and delivered, so as not to reflect a residential housing estate more suited to a larger settlement.

- b) The number of houses in any particular individual scheme should have regard to the scale and character of the existing village and will not normally exceed the provision of the number of units set out in Table 4.1.
- f) Where possible all development should be connected to the public water supply, the public waste-water treatment system and make adequate provisions for storm water storage and disposal.
- g) Village centre development, including business, local convenience retail, community facilities, and residential should be accommodated within the core of the village and should make adequate provision for off street parking.
- k) Good pedestrian and amenity links with the village core/main street are considered to be an important part of any proposed scheme.
- l) Extend footpaths and public lighting to serve the whole of the village and where practicable, to provide for the under-grounding of utilities.
- m) Encourage new development to be designed to ensure that water resources and the natural environment are protected. Protection and enhancement of biodiversity resources within the receiving environment of the villages is also encouraged. Development will only be permitted where it is shown that it is compatible with the protection of sites designated or proposed to be designated for the protection of natural heritage.

89 no. residential units are currently in various stages of the planning application process.

The proposed development exceeds the 'overall scale of new development' for Tower (182 no. residential units during the lifetime of the plan) and the 'normal recommended scale of any individual scheme' (40 units) as identified in table 4.1 We note footnote of table 4.1 which states that

'The normal recommended scale of any individual scheme is set out in the above table. Individual schemes in excess of the recommended scale set out in the above table may be considered where it is demonstrated that the overall scheme layout reinforces the existing character of the village and the scheme is laid out, phased and delivered, so as not to reflect a residential housing estate more suited to a larger settlement.'

The Material Contravention Statement outlines in detail the justification for the scale of development at the subject lands.

The Material Contravention Statement confirms that the scale of the proposed development is consistent with objectives of the NPF, RSES and SRDUA and that the Board may to decide to grant permission for the proposed development, notwithstanding the material contravention of the provisions of the Local Area Plan Objective GO-01/Table 4.1.

While the proposed development also exceeds the normal recommended scale of any individual scheme for Tower which consists of 40 units, the LAP is clear that granting permission is not precluded on that basis. The proposed development contributes to obtaining compact growth and sustainable expansion of Tower. The subject site is located on lands between the villages of Tower and Cloghroe and will assist in coalescing the twin settlements into a single compact settlement. The emphasis of pedestrian permeability and connectivity in the development ensures the infill development has a positive effect on the character of the wider settlement.

03. Response to Board's Opinion

This section of the report sets out, in detail, the applicant's responses to the matters raised in the Opinion issued by An Bord Pleanála in March 2021 (ABP-308980-20). For ease of reference, the various items are listed in the order they appear on the Board's opinion, with the applicant's response to same.

3.1 Residential Density

Further consideration / justification of the documents as they relate to the proposed quantum of development and residential density, with regard to:

- *The location of the site within the boundary of Cork City;*
- *The Blarney Macroom Municipal District Local Area Plan 2017 and the Cork County Development Plan 2014-2020;*
- *National planning policy including the National Planning Framework;*
- *The Regional Spatial and Economic Strategy (RSES) for the Southern Region;*
- *Relevant S28 guidelines including the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'), the 'Design Standards for New Apartments – Guidelines for Planning Authorities' (2018) and the 'Urban Development and Building Heights – Guidelines for Planning Authorities' (2018).*
- *The location / accessibility of the site relative to existing / proposed public transport services, district centres, retail facilities, local amenities and employment centres, including any relevant objectives in the Cork Metropolitan Area Transport Strategy (CMATS).*

The development submitted to the Board for Pre-Application Consultation consisted of 189 no. residential units and represented a density of 31.9 no. units per hectare. In response to the Board's request, the density of the proposed development has been reconsidered having regard to the national and regional policy objectives. The matter of residential density is also addressed in the accompanying Material Contravention Statement prepared by HW Planning.

3.1.1 The location of the site within the boundary of Cork City

As noted by the Board in its Opinion, Tower is now located within the functional area of Cork City Council following the City Council Boundary Extension in May 2019. However, pursuant to the provisions of subsections 30(1) and (2) of the Local Government Act 2019, the existing policies and objectives adopted for Tower in Cork County Development Plan 2014 and the Blarney Macroom Municipal District Local Area Plan will remain in force until such time as a new City Development Plan and/or Local Area Plan is adopted by Cork City Council.

Tower is currently designated as a 'key village' within the settlement hierarchy of the current Cork County Development Plan (CDP), Tower was classified as 'Main Settlement' until 2011. The Cork County Development Plan was adopted in 2014 and the Blarney Macroom Municipal District LAP was adopted in 2017 with the residential density policies in the LAP reflecting and respecting those contained in the CDP 2014.

3.1.2 The Blarney Macroom Municipal District Local Area Plan 2017 and the Cork County Development Plan 2014-2020

The subject site is located within the development boundary of Tower as defined by the 2017 LAP. The LAP does not provide any specific development objectives or density standards for these lands. However, Table 3.1 of the 2014 Cork County Development Plan provides a "guide" to the densities to be applied to lands zoned in the LAPs.

Table 3.1: Settlement Density Guide				
Settlement Type	Settlement / Location	High	Medium 'A'	Medium 'B'
All Towns	Town Centre Locations	Applicable in town centre locations	–	–
Towns with Public Transport Corridor Potential	Ballincollig Blarney Carrigtwohill Carrigaline Cobh Cork South Environs Cork North Environs Glanmire Midleton	Applicable in locations close to future high quality public transport proposals	Generally applicable for future development	Applicable in a limited number of peripheral locations identified in the Local Area Plans
Other Large Towns	Bandon Fermoy Mallow Passage West Youghal	–	Generally applicable for future development	Applicable in a limited number of peripheral locations identified in the Local Area Plans
Smaller Towns	All Other Towns	–	–	Generally applicable for future development

Figure 3.1 Table 3.1 of 2014 CDP

Table 3.1 indicates that Medium B residential density is applicable to smaller towns such as Tower. Objective HOU 4-1 defines 'smaller towns' as settlements of less than 5,000 no. people in population³. Section 3.4.21 of the CDP defines Medium Density 'B' (Low Density Development) as follows:

"The upper limit for this category is proposed at 25 dwellings/ha (35 in smaller towns outside Metropolitan Cork) allowing a wide range of densities to be

³ According to 2016 Census figures, Tower has a population of 3,421 no. people.

constructed and creating an overlap between the upper limit of this category and the lower limit to the Medium Density 'A' category. There is no lower limit suggested for this category but proposals for densities of less than 12 dwellings/ha will need to be supported by a justification of the market demand for the finished units. Also, in order to encourage a broader mix of dwelling types a reduction in the public open space requirement where larger private gardens are provided is proposed.”

County Development Plan Objective HOU 4-1: Housing Density on Zoned Land			
	Min Net Density	Max Net Density	Comment
High	35	No Limit	<ul style="list-style-type: none"> • Applicable in town centres throughout the 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 design/amenity standards and protecting the residential amenity of adjoining property and the heritage assets of town centres.
Medium 'A'	20	50	<ul style="list-style-type: none"> • Applicable in city suburbs, larger towns over 5,000 population and rail corridor locations (example Carrigtwohill). • Apartment development is permissible where appropriate but there is no requirement to include an apartment element in development proposals. • Consider a lower standard of public open space provision where larger private gardens are provided. • Must connect to public water and waste-water services. • Broad housing mix normally required including detached/serviced sites unless otherwise specified in relevant Local Area Plan.
Medium 'B'	12	25	<ul style="list-style-type: none"> • Max Net Density extended to 35 dwellings/ha in smaller towns outside Metropolitan Cork. • Normally applicable in smaller towns (less the 5,000 population). • Can be applied in larger towns through LAP's where there is a requirement to broaden the range of house types. • Densities less than 12 dwellings/ha will be considered where an exceptional market requirement has been identified. • Densities between 25 and 35 dwellings/ha will be considered where an exceptional market requirement has been identified. • Consider a lower standard of public open space provision where larger private gardens are provided. • Must connect to public water and waste-water services. • Broad housing mix normally required including detached/serviced sites unless otherwise specified in relevant Local Area Plan.

Figure 3.2 CDP Objective HOU 4-1

The proposed development represents a density of 35 units per hectare⁴ and, therefore, exceeds the Medium B density range of 12-25 units per hectare defined in Objective HOU 4-1 in the CDP as being suitable for small towns such as Tower. As referenced previously, Objective HOU 4-1 defines smaller towns as settlements with a population of less than 5,000 no. people. Objective HOU 4-1 provides scope for the provision of densities between 25-35 units per hectare in instances where an exceptional market requirement has been identified. As detailed in this statement, Tower is outperforming its projected housing delivery identified in the 2017 LAP of 182 no. units, with 203 no. dwellings either under construction or completed since the LAP was adopted demonstrating the high demand for housing in the settlement.

⁴ Of the Residential developable site area

3.1.3 National, Regional & S28 Ministerial Guidance

As detailed in the Material Contravention Statement considering Section 37 (2)(B) of the Planning and Development Act 2000 we consider that.

"Point (iii) - permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government."

As detailed in the Material Contravention Statement, the proposed density and housing unit mix are justified in the context of recent National Planning Policy and section 28 Guidelines, which seek to increase residential densities, and which have been published since the adoption of the CDP and LAP. These include the NPF, RSES Apartment Guidelines 2018 and the SRDUA.

National Planning Framework 2040 (NPF)

A review of the relevant National Policy Objectives and guidance contained in the NPF, confirms there is a strong emphasis on increasing the density of residential development at appropriate locations, particularly along public transport corridors and within the areas of Ireland's five largest cities and suburbs. Towers' location within the wider Cork Metropolitan Area, the settlements inclusion within the recent Cork City Boundary Extension area, and location on a regular suburban bus route confirms the settlement satisfies the rationale outlined in the NPF for increased residential densities.

The proposed development is in accordance with National Policy Objectives 2a, 3b, 3c and 8 which aim to increase Cork City and suburbs to a minimum population of 314,000 by 2040 and which will require a growth rate of 50-60 %. The proposed development is consistent with NPO 11 of the NPF. The proposed retail/commercial components of the scheme will assist in the creation of local employment and boost the local economy.

Objective 33 of the NPF emphasises the importance of providing homes in locations that can support sustainable development. The Key Future Growth Enablers for Cork include the sustainable development of appropriately located greenfield sites for new housing, particularly on public transport corridors. The subject lands are situated adjacent to a bus stop of the 215 no. Cloghroe – Jacobs Island bus route providing a service every 30 minutes to urban and employment centres of Blarney, Blackpool, City Centre and Mahon. The publication of the Cork Metropolitan Area Transport Strategy (CMATS) indicates this route is included within the 'Core Radial Bus Network' suggesting that the route is potentially to benefit from an improvement in the frequency of bus services and potentially operate at a frequency of 15 minutes or better. The subject site is well positioned to capitalise on the existing and any future upgrades of public transport opportunities in the settlement. The proposed development will also provide for public realm and footpath/cycle upgrades on the R617 benefitting the wider settlement.

The proposed development represents the achievement of effective density on a strategically located site which is well served in terms of the necessary facilities, infrastructure, and amenities to facilitate a higher density development such as that proposed.

Regional Spatial & Economic Strategy for the Southern Region (RSES)

The RSES also supports increased densities at appropriate locations. RPO 10 of the RSES 'Compact Growth in Metropolitan Areas' states that development should be prioritised within existing settlements which are served by public transport, walking and cycling opportunities. This is further supported by RPO 151 of the RSES which also confirms that lands, within or contiguous with the existing urban areas will be prioritised over development in less accessible locations.

The location of higher density residential development at locations served by pedestrian/cyclist and public transport infrastructure is further promoted in RPO 165 of the RSES 'Higher Densities' which states that.

"development at higher densities within existing urban centres and provision of permeability (improved for existing areas and included in any new development), with a focus on locations where it can be demonstrated that such development supports the use of walking, cycling and public transport."

The proposed development satisfies all of these criteria by accommodating permeability through the site to surrounding areas and providing public realm upgrades to the R617 in the form of a new footpaths and cycle lanes and the delivery of a new pedestrian crossing on the R617 serving a reflected sheltered bus stop.

As referenced, the subject lands are situated immediately adjacent to an existing bus stop serving the 215-no. bus route which provides a service every 30 minutes to urban centres including Blarney, Blackpool, city centre and Mahon. Tower is identified as a settlement which is to benefit from the future Bus Connects scheme identified in CMATS with the 215 no. Cloghroe – Jacobs Island route identified on the 'Core Radial Bus Network'. A significant improvement in the frequency of bus services (Bus Connects) on these radial routes is also proposed, with most routes expected to operate at a frequency of 15 minutes or better. Cork MASP Objective 7 aims to.

"Seek sustainable higher densities where practicable at public transport nodal points."

This is consistent with the realization of Goal 2 'of the RSES, 'Excellent Connectivity and Sustainable Mobility' which aims.

"To achieve successful integration between land use and transport planning, achieving sustainable higher densities and appropriate uses at nodes serviced by public transport networks;"

And the 'Guiding Principles' of the Cork MASP which aims to integrate and-use and public transport links and accelerate housing delivery which a focus on achieving "higher densities in the urban built up areas, supported by better services and public transport."

We also note Section 3.9 of the Cork MASP which states regarding 'Sustainable residential densities' the RSES supports the:

"increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights in appropriate locations."

As demonstrated above, the provision of higher residential densities at locations with quality access to walking, cycling and public opportunities is promoted by the RSES. The subject mixed-use development seeks to provide for residential development with direct access to a suburban bus route and within walking/cycling distance to all amenities in the settlement of Tower, delivering a greater mix of uses and increased densities. The proposed development therefore is compliant with the overall policies and objectives of the RSES in this regard.

Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (Apartment Guidelines 2018 and Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 (2018 Building Height Guidelines).

The Apartment Guidelines 2018 suggest 3 broad types of locations suitable for apartment developments as.

- central accessible urban areas;
- intermediate urban areas; and
- peripheral or less accessible urban areas.

While the proposed development site has sustainable attributes and good connectivity to local services, at present the 215 urban bus service does not meet the accessibility criteria for central or intermediate areas. Tower is on the Draft BusConnects network and the service and network will be improved in the future, including the provisions which are made within this proposed development for a bus lane. However, in the absence of this improved service, the proposed development site is located within a Peripheral and/or Less Accessible Urban Location.

The proposed density of 35 units per hectare is the most appropriate scale of development for the site given the site-specific topography and locational factors. This density complies with the ambition contained in The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (March 2018) to achieve.

“higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net including:

- *Sites in suburban development areas that do not meet proximity or accessibility criteria;*
- *Sites in small towns or villages.”*

In terms of car parking requirements, the Guidelines indicate a removal of “requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs”⁵.

Sustainable Residential Developments in Urban Areas 2009 (SRDUA)

The *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)* contain unequivocal support for higher density, compact developments, particularly in accessible urban areas. SPPR 4 of *the Guidelines* make compliance with the

⁵ Section 1.10

minimum densities outlined in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (SRDUA) a requirement. As referenced in Section 2.2.3 of this report, and the accompanying Material Contravention Statement prepared by HW Planning, the method of the calculation of the net residential density is consistent with the relevant density calculation guidance identified in Appendix A of the SRDUA.

In accordance with the SRDUA the subject site would be considered to be an 'edge of centre' location. The Guidelines indicate the following in terms of housing densities on edge of centre sites.

“The emphasis will be on achieving successful transition from central areas to areas at the edge of the smaller town or village concerned. Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 20-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation.”

The proposed development of 35 units per hectare is consistent with the appropriate density range identified in the SRDUA.

3.1.4 Location & Accessibility

As demonstrated in the accompanying Connectivity Map (Appendix B), the proposed development site is situated in a sustainable location within walking/cycling distance of local amenities.

- The site is within walking distance (approximately 800m) of Tower village centre, which has a number of shops, pubs, restaurants, doctors surgery, pharmacy, physiotherapist etc. The site is also 200-300 metres northwest of Cloghroe Neighbourhood Centre, containing Cloghroe National School, Cloghroe Church, post office, pharmacy, beauticians and fitness studio. The proposed upgrades to the R617 will facilitate enhanced pedestrian and cyclist mobility in the settlement ensuring that all local services provided in the settlement will be easily accessible via sustainable methods of transport.
- The site is adjacent to an existing bus stop for the 215 no. Cloghroe – Jacobs Island bus route with a service every 30 minutes. Tower is identified as a settlement which is to benefit from the future Bus Connects scheme identified in CMATS with the 215 no. Cloghroe Jacobs Island route identified on the 'Core Radial Bus Network'. A significant improvement in the frequency of bus services on these radial routes is also proposed, with most routes expected to operate at a frequency of 15 minutes or better.
- The proposed development includes the relocation of the existing bus stop and delivery of signalised pedestrian crossing, cycle lanes and footpaths which will benefit all existing and future residents of Tower/Cloghroe in accessing public transport services.

3.1.5 Response

We note that the rationale in the County Development Plan for introducing the Medium B residential zoning objective was to ensure that the market demand for lower density housing could be accommodated and met. However, both the County and Local Area Plan pre-date the *National Planning Framework*, *The Regional Spatial Strategy for the Southern Region (2020)* and various Section 28 Ministerial Guidance documents such as the *Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*.

In accordance with the Board's Opinion, the residential density of the proposed development has been reviewed and the revised scheme with a density of 35 units per hectare is the most appropriate scale of development for the site given the site-specific topography and locational factors. This density complies with the ambition contained in the *National Planning Framework*, *The Regional Spatial Strategy for the Southern Region (2020)* and various Section 28 Ministerial Guidance. The density also complies with the density recommendations contained in the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* for edge of centre sites.

3.2 Surface Water Drainage and Flood Risk

Further consideration / justification of the documents as they relate to the issue of surface water drainage and flood risk, with regard to:

- *A Site Specific Flood Risk Assessment in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities, to include hydraulic modelling of the watercourse at the development site and to address in particular any potential downstream impacts on the Owennagearagh River to the south of the site and at the R617/R579 junction.*
- *Detailed treatment of the watercourse on the western side of the site, including the riparian zone, such that there is no increase in flood risk, with regard to relevant guidance provided in the Inland Fisheries Ireland document 'Planning for Watercourses in the Urban Environment'.*
- *Detailed surface water drainage proposals for the development, to include SUDS measures where possible, and attenuation proposals with full details of proposed outfall rates, to be integrated where possible with the proposed roads design and landscaping scheme.*
- *Landscaping scheme to provide details of the treatment of the riparian zone and wetland areas within the site, along with biodiversity corridors.*
- *Detailed site layout of the development, to indicate any flood zones present at the development site based on the modelling in the SSFRA.*
- *The applicant is advised to consult further with Cork City Council Drainage Section in relation to these matters in advance of lodging an application.*

3.2.1 Site Specific Flood Risk Assessment

In accordance with the Board's Opinion, this application for permission is accompanied by a Site-Specific Flood Risk Assessment (SSFRA) in accordance with the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities. This has been prepared by Irish Hydrodata Limited and includes hydraulic modelling of the watercourse at the development site and addresses the any potential downstream impacts

of the proposed development on the Owennagearagh River to the south of the site and at the R617/R579 junction.

In addition to responding specifically to the Board's Opinion, the SSFRA has full regard to the Board's decision to refuse permission for the development of 73 no. dwellings to the west of the subject site (ABP ref. no. 307785-20) and the observations of Senandale Residents Association on the original application (made under Cork County Council planning reg. ref. no. 19/5413).

The Board deemed that the then proposed development to the west of the subject site would be premature pending the carrying out of works to mitigate flooding along the R579. It should be noted that the subject development is not dependent on the R579 for access.

The FRA notes that the 2017 LAP defines a Zone A/B flood risk area approximately 80m to the south of the subject site, however, those flood zones do not extend to the subject site. In addition, the OPW website www.floodinfo.ie has no record of flooding events on the site and mapping produced by the OPW for the Lee CFRAM study shows localised flooding to the south across the R579, but again it does not show any flooding within the site of the proposed Cloghroe SHD. The SSFRA report indicates that flood waters in the vicinity of the site originate either from the Owennagearagh river or the western stream.

In accordance with Section 5.8 of the Flood Risk Guidelines and given the presence of a stream on the western boundary, the applicants at pre-application stage committed to preparing a site specific flood risk assessment. The southern part of the site is low lying, the western stream channel is small, not maintained and locally obstructed by tree debris. Waters are prone to overflow on both sides of the stream and during such events waters will encroach on the lower parts of the site.

Detailed hydraulic modelling has been carried out for the site and surrounding and confirms that only the southern low lying part of the site is at risk of flooding. The majority of the proposed development area, and all of the proposed dwellings, are elevated and well above the maximum possible floodwater level. It is not possible to significantly improve the flow capacity of the stream on the western boundary due to the local ground levels.

In order to protect the southern portion of the site, flood mitigation measures including the provision of 1,200m³ of underground flood water storage and 600m² drainage basin storage, are proposed.

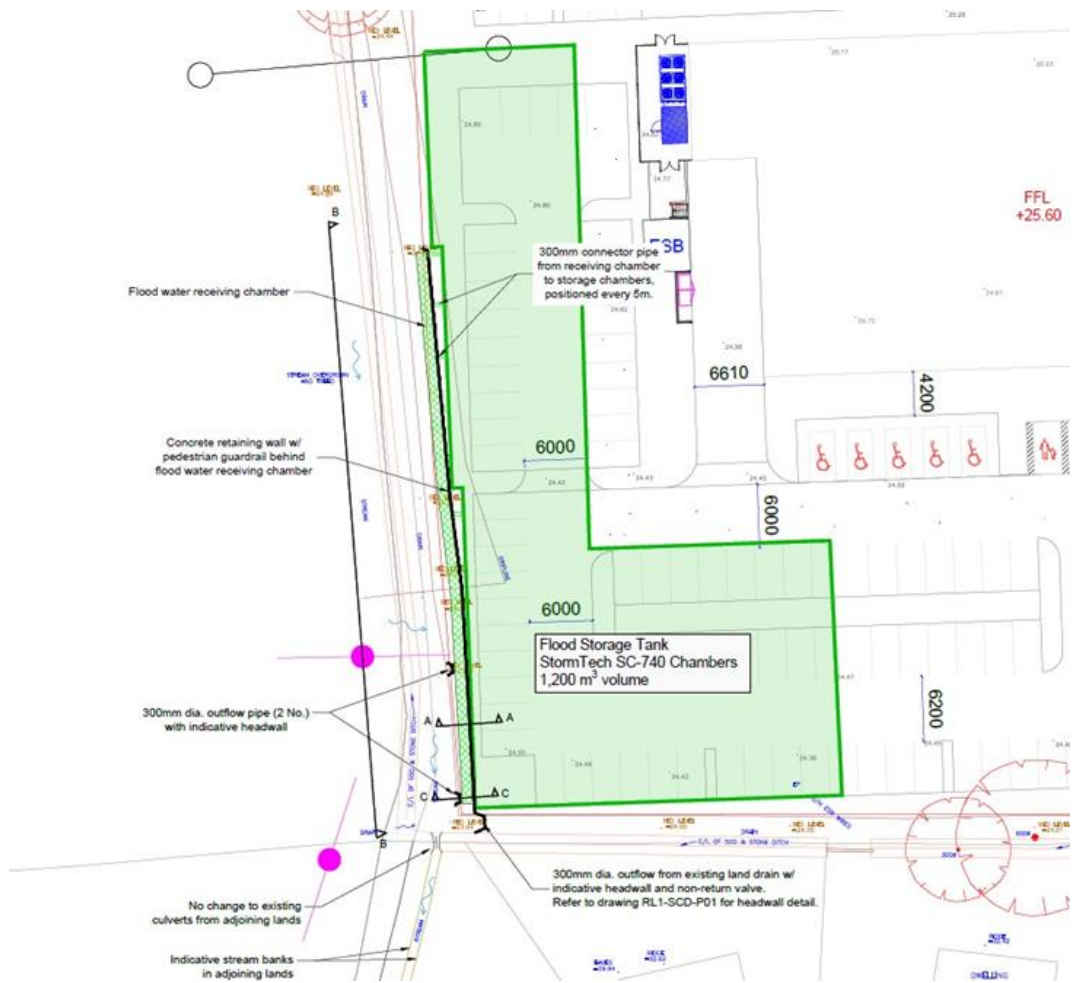


Figure 3.3 Proposed Flood Storage Tank Layout

In addition to protecting the site from flooding these measures will protect adjoining properties in Senandale. Surface water runoff from the site which would previously have gone to the western stream will now be directed to the east into the public stormwater system on the R617 and rejoin the Owennagearagh downstream of the Currabeha bridge, which is a further improvement on the existing situation.

A consequence of protecting the site and properties in Senandale from flood risk is that there is a predicted small and localised increase in water levels, up to 20mm for the 1:1,000 year flood event, on lands to the west of Senandale. However, these lands are already in Flood Zone A and were earmarked for flood water storage in the adjoining development proposal (ABP ref. no. 307785-20) and within the current proposal at the lands under 21/40620. The proposed development will have no impact on these lands which will remain Flood Zone A and continue to fulfill a flood storage function. The potential increase in water levels of 20 mm in this area will not have any impact on the proposed access road or the development potential of the lands or indeed the adjacent Senandale. The residual risk of flooding to the lands to the west is acceptable, given the local context.

While the proposed development will reduce the available flood plain area the mitigation measures will increase volume storage available increases by 500m³ and eliminate the risk of flooding on the site. In addition to effectively mitigating flood risk on the subject site the proposed development will protect adjacent properties in Senandale. Given the increase

in flood storage volume the proposed development will have no impact on the Owennagearagh River to the south of the site and at the R617/R579 junction.

Given the low risk of flooding identified on the site, which is not identified in the 2017 LAP, OPW website www.floodinfo.ie or mapping produced by the OPW for the Lee CFRAM study, the proposed development is consistent with the “sequential approach” advocated by Section 3.2 of the Flood Risk Guidelines and complies with “the broad philosophy underpinning the sequential approach in flood risk management”.

In accordance with the sequential approach defined by the Flood Risk Guidelines a Justification Test was carried out within the context of the SSFRA. As confirmed in the accompanying SSFRA report, the proposed development satisfies criteria of the Development Management Justification Test as identified in the Flood Risk Management Guidelines.. Table 3.2 of the Flood Risk Guidelines highlights that the ‘*acceptability or otherwise of levels of residual risk should be made with consideration of the type and foreseen use of the development and the local development context*’.

3.2.2 Detailed treatment of the watercourse on the western side of the site

The landscaping plans that accompany the planning application were prepared by Forestbird Design and highlight the details of the watercourse on the western boundary of the site. As outlined in detail in the SSFRA and the Infrastructure Report prepared by MHL Consulting Engineers, this stream channel is small, not maintained and locally obstructed by tree debris. Therefore, waters are prone to overflow on both sides of the channel.

In order to protect the site from overflow from the western stream, a flood storage network with a volume of 1,200 m³ is proposed. This system will take the form of a Stormtech subsurface unit that will allow the stream to flood as required, but these waters will be stored in the unit as highlighted in Figure 3.4. This system will ensure the site and the adjacent properties in Senandale are protected from the western stream.

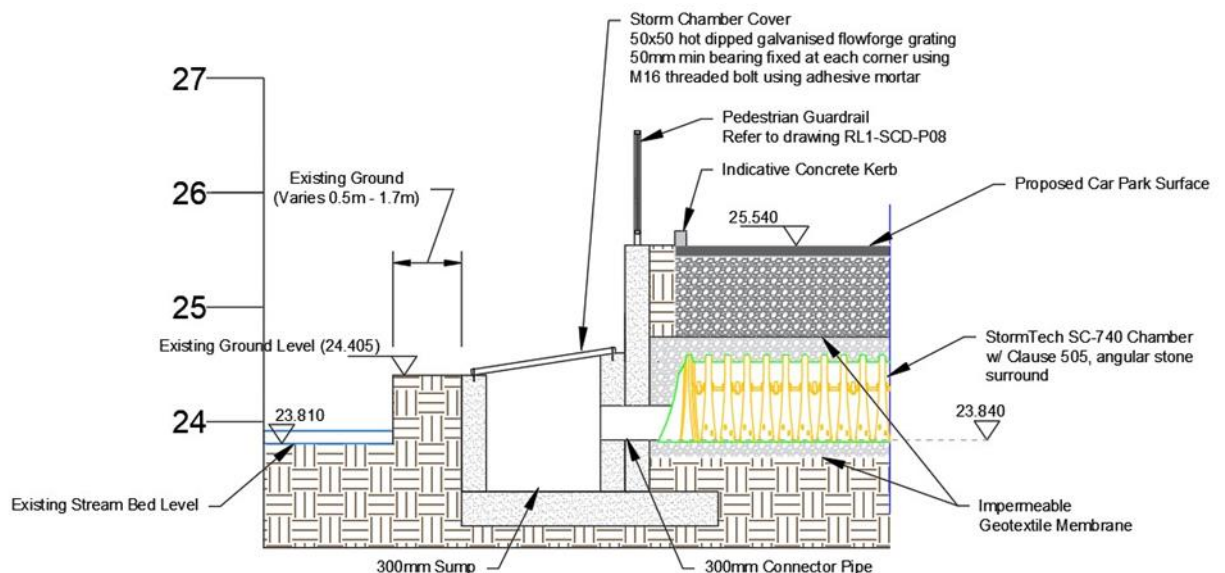


Figure 3.4 Cross Section of Proposed Sub Surface Flood Storage System

As illustrated in Figure 3.4, the chamber for water to flow into the storage system will be located between 0.5 and 1.7 metres from the stream to which no works are proposed. As no works are proposed to the stream, a section 50 licence in accordance with the provisions of the Arterial Drainage Act, 1945 is not required.

As illustrated on Landscape Drawings L102 and L103 prepared by Forestbird Design it is proposed to retain the vast majority of trees within this riparian zone, which will function as a 'Streamside Amenity Path' as highlighted in landscape drawing L106. The proposed amenity path will be 420m in length and meander in response to the mature tree line along the stream. Approximately 1/3 of the path is level and 2/3 of it is at a 1:20 gradient, making it accessible and attractive for walking and cycling. This amenity path links with other footpaths within the proposed development and will be an attractive amenity for future residents.

Having regard to the separation distance between the proposed development and the western boundary and the fact that no works are proposed to the stream, the proposed development is consistent with the advice contained in the Inland Fisheries Ireland document '*Planning for Watercourses in the Urban Environment*'.

3.2.3 Detailed surface water drainage proposals for the development

The accompanying Engineering Design Report prepared by MHL Consulting Engineers details the surface water drainage proposals for the proposed development, which have been designed in accordance with SUDS.

The proposed system provides for the diversion of existing surface water flowing into the western stream to the public system on the R617. The report provides full details of attenuation proposals and proposed outfall rates. The proposed expansion of the land drain which runs east west through the site into two drainage basins which will be landscaped in accordance with plans developed by Forestbird Design demonstrates the integration of surface water, ecological and landscaping strategies.

3.2.4 Landscaping scheme to provide details of the treatment of the riparian zone and wetland areas within the site, along with biodiversity corridors.

The accompanying landscaping plans prepared by Forestbird Design provides details the treatment of the riparian zone and wetland areas within the site and highlights the development of biodiversity corridors. These plans have been developed in consultation with project ecologists Atkins and project engineers MHL Consulting Engineers, to ensure the integration of surface water, landscaping and ecological interests.

3.2.5 Detailed site layout of the development, to indicate any flood zones present at the development site based on the modelling in the SSFRA.

Section 3.3 of the accompanying SSFRA illustrates the modelled impact of the site development on the local flood inundation patterns and highlights that flood waters are contained within the upstream drainage basins and the 1200m³ underground storage tank. Flood waters have no impact on the proposed houses, remainder of the site and are prevented from entering the Senandale estate.

3.2.6 The applicant is advised to consult further with Cork City Council Drainage Section

Prior to the submission of the application there was consultation with the Drainage Section of Cork City Council on the proposed surface water and flood management proposals. Cork City Council noted that based on the advice from the Board at the Tri-Partite meeting that the subject application had to contain an independent proposal for addressing flood risk issues on the site and which could not be dependent on potential future works by others. Cork City Council accepted this principle and were supportive of the surface water and flood management proposals proposed.

3.3 Interaction with R617, Pedestrian and Cycle Connectivity

Further consideration/justification of the documents as they relate to the road frontage to the R617 and to pedestrian and cycle connectivity to the wider area. The applicant is advised to address the following matters in particular:

- The provision of a detailed roads layout for the site frontage to the R617, as per the comments of Cork City Council Transport Mobility Section and Cork City Council Urban Roads and Street Design, to include an appropriate, suitable pedestrian crossing of the R617 to the satisfaction of the planning authority;
- Traffic calming measures to the R617;
- Relocation of the existing bus stop at the development site and associated pedestrian infrastructure;
- Cycle routes along the R617 in accordance with the guidance provided in the National Cycle Manual;
- All works to the R617 that are to be delivered by the prospective applicant should be included in the red line site boundary and the applicant should provide clarity as to the proposed timeframe for their delivery;
- The applicant shall demonstrate sufficient legal interest to carry out the proposed works at the R617;

As illustrated in the accompanying Connectivity Map (Appendix B), the proposed development site is well located and within 5 to 10 minutes walking distance of all local amenities, that are currently located within the centres of Cloghroe and Tower to the north. The site is also situated immediately adjacent to an existing bus stop serving as the terminus of the No. 215 Cloghroe – Mahon Point urban bus route providing a half hourly service to urban centres including Blarney, Blackpool, the City Centre and Mahon. Prior to the submission of the application the applicant engaged in further discussions with Cork City Council to discuss the road improvement and connectivity proposals. The proposed cross section of the R617 is detailed in MHL Drawing No RL1-PXSP-P01, an extract of which is Figure 3.5 below.

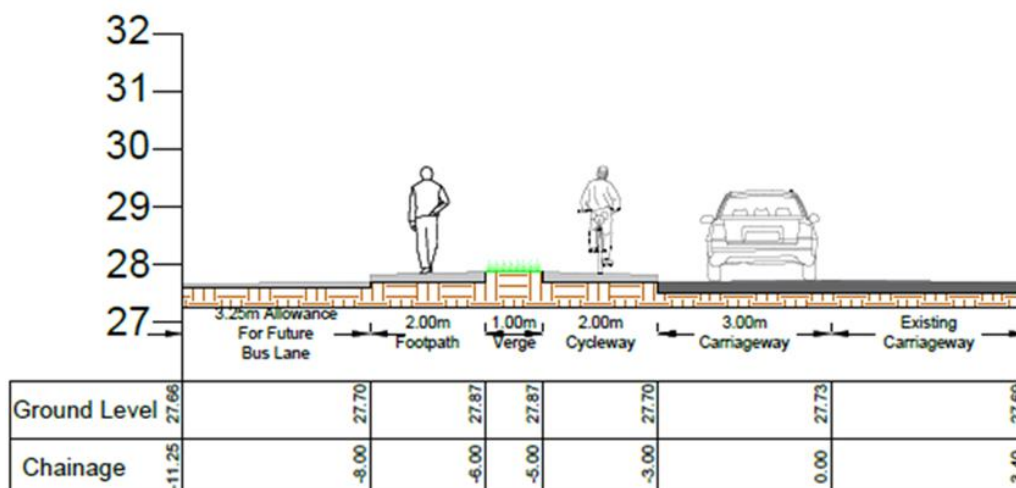


Figure 3.5 Proposed Cross Section of R617

MHL Consulting Engineers Drawing RL1-PFP-P01 details road layout proposed for the frontage to the R617 and the wider area. This highlights the provision of

- traffic calming measures including the provision of a signalised toucan crossing to improve connectivity with Tower to the north;
- relocation of existing bus stop and provision of bus shelter;
- provision of 2 metre footpath, 1 metre verge and 2 metre cycle lane in accordance with the guidance provided in the National Cycle Manual;
- future provision for 3.25m bus lane to form part of BusConnects network. In the interim this will form part of the hard and soft landscaping proposal to the R617.

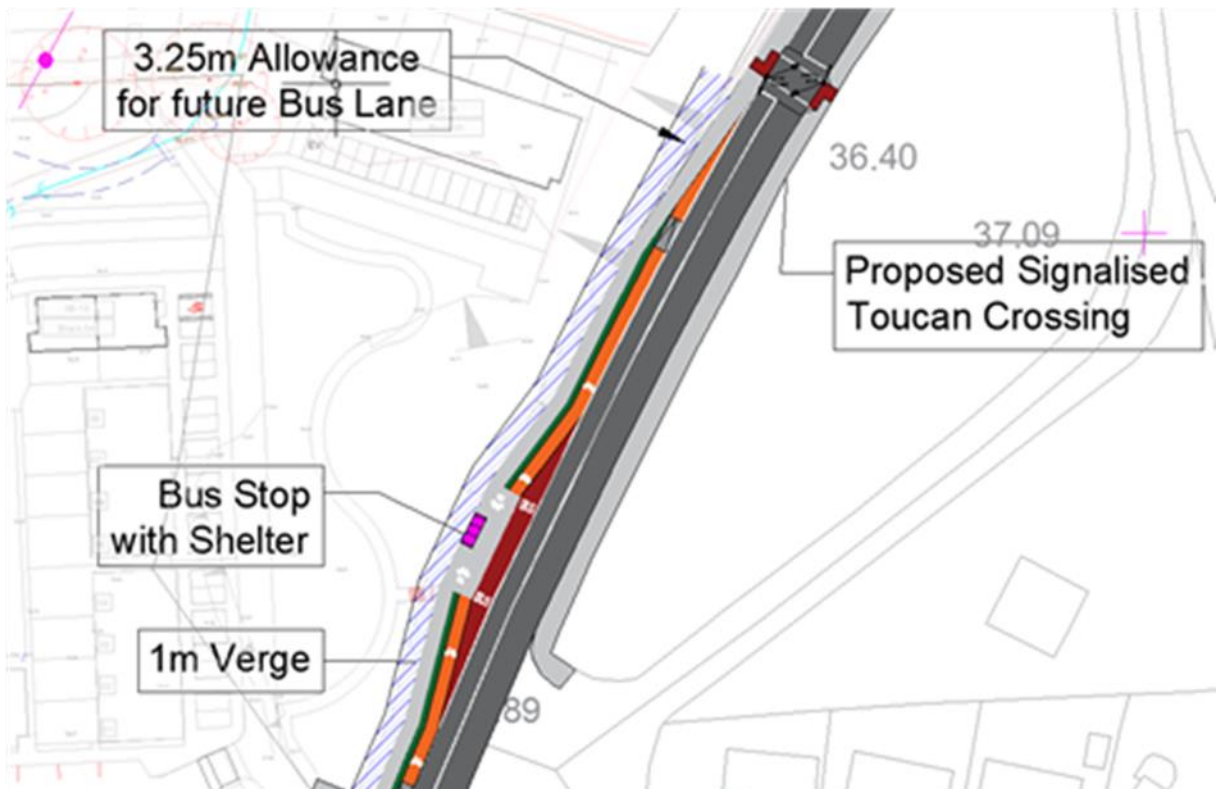


Figure 3.6 Proposed Upgrades to western side of R617

All works to the R617 will be delivered by the applicant and are included within the red line site boundary. These works will be delivered as part of Phase 1 of the construction programme. The works are to be carried out on lands within the ownership of the applicant or Cork City Council and a letter of consent from Cork City Council to include these proposed works within the application is included in the application documentation.

3.4 Specific Information Requested in ABP Opinion

In addition to the addressing issues relating to residential density, surface water management and connectivity, the Board Opinion listed the following specific information that should be included with the application.

1. Statement of Material Contravention (if applicable) with regard to the matters of housing quantum and residential density.

As referenced previously, a Material Contravention Statement has been prepared which addresses the following matters.

- The proposed Cloghroe SHD provides for a net residential density of 35 units per hectare (of the developable residential site area). This is in excess of the suggested Medium B density (12-25 units / ha) indicated for Small Towns by Table 3.1 of the Cork County Development Plan.
- A total of 397 no. car parking spaces are proposed for the proposed development, which are allocated on the basis of housing type and likely demands of future residents. The proposed parking provision is below the Development Plan minimum standard of 2 spaces per house and 1.25 spaces per apartment as described in Table 1a, of Appendix D of the CDP).
- The proposed development exceeds standards identified in LAP Objective GO-01 and table 4.1 of the LAP regarding future development in the settlement of Tower. The proposed development of 198 no. residential units exceeds the recommended scale of any individual residential scheme in the settlement of 40 no. units and the overall scale of development in the settlement of 182 no. residential units during the lifetime of the 2017-2023 LAP.

2. Housing Quality Assessment with regard to the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities.

A Housing Quality Assessment Report which details and assesses the proposed development in accordance with the standards set out in the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities has been prepared by Deady Gahan Architects and is included with the application.

3. Building Lifecycle Report.

A Building Life Cycle Report has been prepared in accordance with the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities by Aramark and accompanies this application.

4. A site layout plan showing which, if any, areas are to be taken in charge by Cork City Council.

A site layout plan prepared by MHL Consulting Engineers and illustrating the areas to be taken in charge by Cork City Council accompanies the application.

5. Comprehensive landscaping scheme for the entire site, to include (i) Arboricultural Impact Assessment and details of measures to protect trees and hedgerows to be retained at the site and (ii) rationale for proposed public open space provision, to include an open space hierarchy and detailed layouts for the public open spaces.

A comprehensive landscaping plan prepared by Forestbird Design accompanies the application and includes an Arboricultural Impact Assessment, which details measures to protect trees and hedgerows to be retained at the site. The landscape masterplan and landscape strategy prepared by Forestbird Design details the rationale for proposed public open space provision, its hierarchy and provides detailed layouts for the public open spaces.

6. Landscape and Visual Impact Assessment with photomontages and CGIs of the proposed development, to include, inter alia, consideration of visual impacts on adjacent residential areas and on any sensitive or

designated views / prospects in the vicinity, with regard to relevant development plan landscape designations.

In response to the Board's request Forestbird Design prepared a Landscape and Visual Assessment of the proposed development. The impact of the proposed development from a total of 12 locations was considered. The impact from 7 of these locations was considered to be imperceptible or to be obscured by intervening terrain as illustrated on View Receptor Map Drawing No. LVA1. Based on this appraisal, 5 no. photomontages from areas of greatest potential visual impact were prepared in addition to 4 no. CGI's to illustrate character and detail of the proposed development.

7. Existing and proposed ground levels across the site. Detailed cross sections indicating proposed FFL's, road levels, open space levels, etc. relative to each other and relative to adjacent lands and structures.

Detailed cross sections indicating proposed FFL's, road levels, open space levels relative to each other and relative to adjacent lands and structures have been prepared by Deady Gahan Architects and are included within the application drawing pack submitted with the application.

8. Traffic and Transport Impact Analysis, to consider cumulative impacts of permitted development in the area.

The Board will note the accompanying Traffic and Transport Assessment (TTA) prepared by MHL Consulting Engineers which examined the impact of trip generation of various junctions in the vicinity of the site. The TTA concluded that the traffic modelling results show that both proposed junctions serving the development operate within capacity up to and including the design year 2039. Traffic surveys were conducted in May 2021 and November 2021.

The analysis of the R617/R579 junction shows that the junction currently operates within capacity with a level of service D during the morning peak hour. With the addition of standard growth rates on existing traffic flows the level of service for 2024 goes to E for the AM time period. When development traffic is added the Junction LOS goes to F. The conclusion from the modelling is that the junction will deteriorate over time both with/without development taking place. To resolve this issue, it will be necessary to carry out remedial works, such as the signalisation of the junction, in future years. Other interim measures, such as developing right turn lanes on approach roads, will also have a positive benefit. The delivery of Bus Connects will include modifications to junctions to prioritise public transport and it may be that this junction will fall into this category.

A LinSig traffic model of the junction was constructed both with/without development traffic which shows that the junction can operate within capacity up to the Design Year 2039 if the junction is signalised. An increase in cycle time from 60 seconds to 90 seconds in 2029 is warranted given the continued increase in traffic volumes based on TII (Transport Infrastructure Ireland) growth rates.

Chapter 5 of the accompanying EIAR (Material Assets – Traffic & Transportation), refers to cumulative impacts with other permitted/proposed developments in the area. It is predicted that when cumulative impacts are assessed⁶, residual impacts for both construction and operational phases will be 'slight, negative and likely'. It is predicted that the proposed development will not have a negative impact on the carrying capacity of the

⁶ Including the proposed development to the west for 73 no. units proposed under 21/40620

adjacent R617 and the significant road and connectivity proposals will help mitigate any potential impacts and promote more sustainable travel patterns.

9. Rationale for the proposed car parking provision with regard to Cork County Development Plan 2014 car parking standards and the performance related approach set out in the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to include a car parking management strategy, details of the allocation of car parking spaces to the proposed land uses and parking provision for the creche.

A total of 397 no. car parking spaces are proposed and will be allocated in accordance with the attached Drawing No. 20068/P/014 prepared by Deady Gahan Architects, which is attached as Appendix A. As highlighted the parking strategy for the proposed development allocates parking on the basis of housing type and likely demands of future residents. Cork County Council's car parking standards are outlined in Table 1a, Appendix D of the County Development Plan. While maximum standards are assigned for the majority of development types, the residential standards are set as minimum values as follows:

- Dwelling House – 2 spaces per dwelling
- Apartments – 1.25 spaces per dwelling

Note 4 under Table 1a states that:

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

Parking for the proposed houses within the scheme is generally 2 spaces per house as specified in the County Development Plan, with the exception of 20 no. 2 bedroom townhouses located in Area B which have been provided with 1 no. space. Parking for the apartments have been allocated on the basis of 1 space per unit for 2 and 3 bedroom duplex apartments and 0.5 space per unit for 1 and 2 bedroom ground floor units. This is below the minimum requirement of 1.25 spaces per apartment specified in the Development Plan. Within Area D parking for the proposed 27 no. 1 and 2 bedroom stepdown apartments is provided on the basis of 1 spaces per 3.5 apartments, which is considered adequate given the nature of the proposed residential use as step-down units and their proximity to services and the bus stop. 9 no. spaces have been allocated to the proposed creche and 101 spaces have been provided for the commercial area containing the retail foodstore, café and 2 no. apartments over.

As described in detail in the Material Contravention Statement, the proposed deviation from car parking standards identified in the CDP is justified in accordance with recent National Planning Policy and Section 28 Guidelines including the NPF, RSES and Apartment Guidelines 2018.

The proposed development represents the achievement of appropriate car parking provision in circumstances where the NPF promotes an enhanced focus on promoting walking and cycling in settlements and adopting performance-based design standards for settlements for matters including car parking. Due to the sites' location in close proximity

to the settlement core and short walking distance from local amenities including Cloghroe National School. Church and neighbourhood centre and public transport opportunities it is consistent that the proposed reduction in car parking is consistent with the relevant guidance in the NPF.

The proposed development represents the achievement of appropriate car parking provision in circumstances where the RSES supports the prioritisation of walking and cycling as modes of transport in urban areas and a reduction in car-based transport. The proposed development provides for 134 no. bicycle spaces across the entire scheme and provides for public realm upgrades and pedestrian links which satisfy desire lines to the neighborhood centre to the southeast and village core to the north. The proposed reduction of car parking spaces for the proposed residential units and prioritisation of walking, cycling and access to public transport links is consistent with the overall policies and objectives of the RSES in this regard.

The reduction in car parking in this area of the site is responsive to the site-specific context. We particularly note the Apartment Guidelines 2018 and sections 1.10, 4.16 and 4.18 which state that car parking standards should be appropriately reduced at locations which are served by public transport opportunities.

Section 4.22 of the Apartment Guidelines 2018 state that:

'As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.'

With the exception of the previously referenced step-down units for primarily elderly occupants, parking for the proposed apartments have been allocated on the basis of 1 space per unit for 2 and 3 bedroom duplex apartments and 0.5 space per unit for 1 and 2 bedroom ground floor units.

In relation to the car parking standards for apartment developments, as contained in table 1a, Appendix D of the County Development Plan, while the development standard is stated as a minimum required value, it is also stated that a relaxation in these standards may be accepted where a development is accompanied by a mobility plan and a shift to sustainable modes of transport can be demonstrated.

The proposed development provides for significant upgrades to the local network which will provide for improved connectivity to existing urban areas and future public transport network. Therefore, we consider that a reduction in the parking provision to serve the proposed development which is below the standards outlined in the County Development Plan, is justified.

Given the locational advantages of the proposed development site, which is within 10/15 minutes' walk of all local amenities and the significant improvements in the transport network that will result in the improved connectivity to the Tower and future improvements to the BusConnects network identified in CMATS, compliance with a reduced parking standard suggested by national guidelines is justified in this instance

10. Retail Impact Analysis.

In response to the Board's Opinion and Retail Impact Assessment (RIA) has been carried out The RIA has been prepared in accordance with the Retail Planning Guidelines. The RIA

concludes there is adequate capacity within the catchment to support the proposed retail food store of 1,315 m² net sales area.

11. Rationale for proposed childcare provision with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. The applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.

A Childcare Needs Assessment has been prepared to accompany a planning application. This assessment has been prepared in accordance with the adopted policies of Cork County Council and the National Childcare Guidelines. A review of public records indicates the presence of a number of childcare facilities in close proximity to the subject site. Notwithstanding this, and the presence of a significant number of 1-2 bed units in the proposed development, provision has been made on site for a 42-child place creche in full accordance with established standards. The detailed design of the proposed creche has been influenced by constructive discussions with Cork County and Cork City Childcare Committees

12. Part V proposals.

The applicant confirms that it purchased the subject lands between 1 September 2015 and 31 July 2021. In accordance with guidance contained in Circular 28/2021 and requirements under Part V of the Planning and Development Act 2000, as amended, and the Affordable Housing Act 2021, the applicants propose to transfer 19 no. units within the proposed development to the Planning Authority for the purposes of social housing.

This represents 10% of the overall number of units within the scheme and will comprise a mixture of apartments, duplexes and terraced units. A Part V Costs & Methodology is outlined below and attached is a map identifying the units which the applicants propose to transfer. The subject units are identified on the accompanying Part V Site Layout Plan prepared by Dedy Gahan Architects. As outlined in its Opinion on the Pre-Application Consultations, Cork City Council Housing Capital Section has indicated that the proposal is acceptable in principle.

13. Ecological Impact Statement to include details of flora, fauna and habitats present at the site; consideration of impacts on the riparian zone of the watercourse on the western side of the site; impacts on existing wetlands at the site; the retention and management of hedgerow boundaries at the site; impact on bats including the presence of any potential bat roosts at the site.

Chapter 9 of the accompanying EIAR provides details of:

- flora, fauna and habitats present at the site;
- consideration of impacts on the riparian zone of the watercourse on the western side of the site;
- impacts on existing wetlands at the site;
- the retention and management of hedgerow boundaries at the site;

- impact on bats including the presence of any potential bat roosts at the site.

The EIAR concludes that the residual impact of the proposed development is likely to be slight negative at a site level and be of short-term duration.

The impact on bats including the presence of any potential bat roosts at the site is assessed in a Bat Study of the proposed development prepared by Greenleaf Ecology on behalf of Atkins. The Bat Study concludes that the proposed development will have a slight and temporary impact to local bat species due to permanent local habitat loss of hedgerows on site.

To compensate for the loss of hedgerow and partial removal of woodland, substantial native tree and hedgerow planting will be established on the site. Large areas of open space will be maintained on the site, along with areas of wet and wildflower meadow. The mitigation measures recommended in the Bat Study in relation to construction activities, public lighting and landscaping have all been incorporated into the various reports and strategies.

14. AA screening report or NIS.

A NIS, which also incorporates the necessary information for the Board to carry out a Stage One AA Screening, prepared by Atkins accompanies the planning application. As set out in the Stage One AA Screening section of the NIS, it has been concluded, firstly, that it cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites, that the proposed development, individually or in combination with other plans and projects, would be likely to have a significant effect on the Great Island Channel SAC and the Cork Harbour SPA.

As a result, a Stage Two Appropriate Assessment is required, and the Natura Impact Statement was prepared in respect of the Great Island Channel SAC and the Cork Harbour SPA, and submitted with the application for permission in respect of the proposed Cloghroe SHD.

Accordingly, where the potential for any likely significant effects on any European Site has been identified then, as is apposite when conducting a Stage Two Appropriate Assessment, consideration has been given to the mitigation measures which have been identified and which will be implemented in order to avoid potential water pollution events, in particular. The measures ensure that the construction and operation phases of the proposed development will not adversely affect the integrity of any European sites. In conclusion, in circumstances where the mitigation measures identified in this NIS are implemented, there is no reasonable scientific doubt remaining as to the absence of adverse effects on the constitutive characteristics of the Great Island Channel SAC and Cork Harbour SPA.

Therefore, it can be objectively concluded that the proposed Cloghroe SHD, whether individually or in combination with other plans or projects, will not adversely affect the integrity of any European site.

15. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.

In response to item 15, an EIAR has been prepared and accompanies this application. In those circumstances, article 299A provides that, where a planning application for sub-threshold development is accompanied by an EIAR and an EIA screening request was not made, as in this case, the application shall be dealt with as if the EIAR had been submitted in accordance with section 172(1) of the 2000 Act.

04. Other Planning Issues

The Board’s Opinion identified issues to be addressed in the planning application and provided an extensive list of the documents and details that should be submitted. The response to these items in Section 3 has dealt with the majority of the relevant planning issues. Outlined below are other issues that may be considered by the Board in the context of the decision-making process.

4.1 Protection of Residential Amenities of Adjacent Properties

The proposed development has full regard to the need to protect the amenities of adjacent properties and the submitted SSFRA report has carefully considered the observations of Senandale Residents Association on the original application submitted by another developer in respect of lands to the west of the site of the proposed Cloghroe SHD (reg. ref. no. 19/5413 and ABP 307785-20 and most recently 21/40620.) As described in detail above, the flood storage measures which are to be implemented as part of the proposed development will protect properties in Senandale at this location from flooding from the western stream.

In addition to measures designed to protect adjacent properties from flood risk, the proposed development has full regard to the potential impact on existing dwellings in Senandale of the proposed Cloghroe SHD. Landscape Drawing L112 highlights the proposed southern boundary treatment, which involves the maintenance and enhancement of the existing boundary in addition to the step back of the proposed carpark. Given the topography this area is proposed to be filled but a 1.2 metre high solid timber fence on top of the retaining wall will ensure that there will be minimal impact on the properties to the south by virtue of overlooking or overbearance.

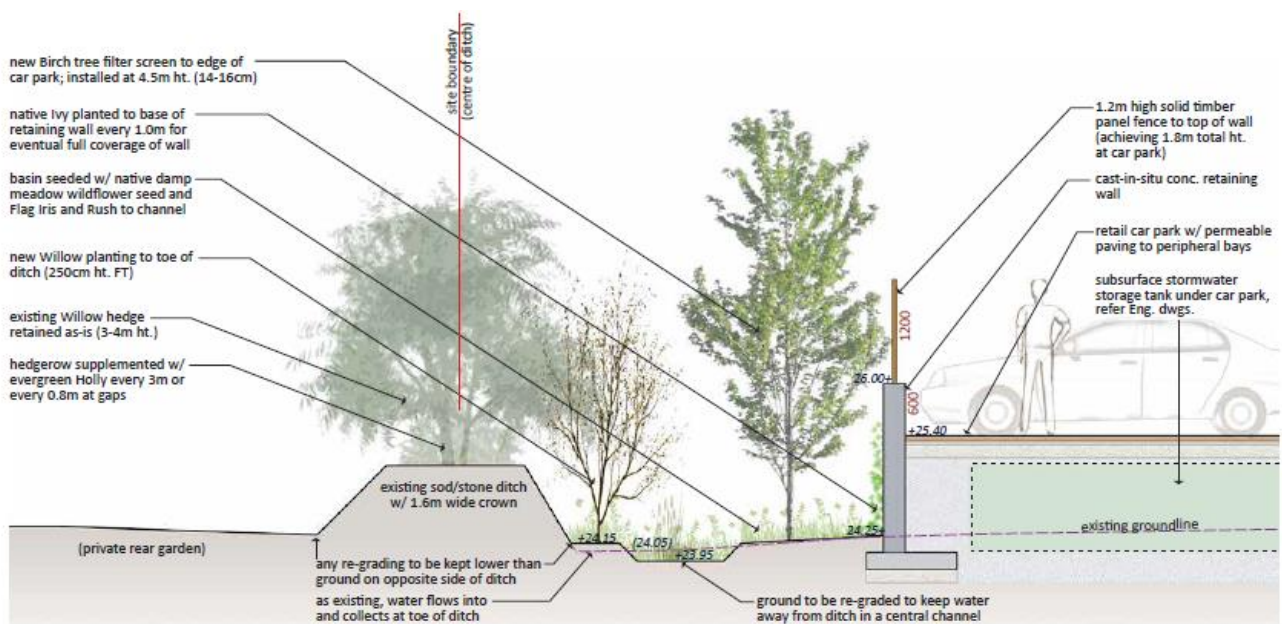


Figure 4.1 Proposed Southern Boundary Treatment

The Landscape & Visual Impact Assessment submitted with the application assesses the visual impact of the proposed development on Senandale and predicts a Slight, Neutral impact given the separation distance and maintenance of existing trees where possible. Viewpoint 5 in the photomontage booklet indicates the proposed development is not visible and this is verified in the analysis and attached section of this Viewpoint 5.

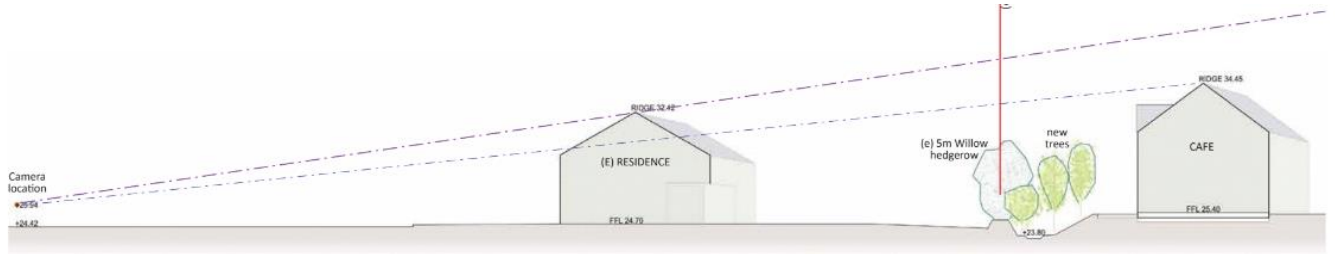


Figure 4.2 Section through Senandale & Proposed Development.

05. Conclusion

The proposed development provides for a strategic housing development on zoned lands within Tower. Tower has grown substantially over the past 30 years and continues to perform strongly in terms of housing delivery, which highlights its attractiveness as a town within Metropolitan Cork. In tandem with the delivery of housing, which is required to meet Metropolitan Cork's ever increasing housing target, the proposed development will deliver additional retail services needed to serve its expanding settlement and which will reduce the need for unsustainable shopping trips outside of the catchment to Ballincollig or Blackpool.

The proposed development site is within 5-10 minutes' walk of all local amenities and the bus stop adjacent to the site is the terminus for the 215 urban service. Tower forms part of the BusConnects network and the proposed development provides for improvements to the local road network. These proposed works, which have been included within the red line development boundary of the site with the consent of Cork City Council, include upgrades to the pedestrian environment to the north of the site including the provision of a new pedestrian crossing which will improve connectivity to Tower to the north. A cycle lane is also proposed in addition to provision for bus lanes which will form part of the future BusConnects network.

In accordance with the Board's Opinion, the flood risk impact of the proposed development has been assessed in detail through the preparation of a site-specific flood risk assessment (SSFRA) report which includes hydraulic modelling of the stream on the western boundary and addresses the any potential downstream impacts of the proposed development. While the proposed development will reduce the available flood plain area, the mitigation measures will increase volume storage available increases by 500m³ and eliminate the risk of flooding on the site and the adjacent properties in the Senandale estate, which are currently at risk of flooding from this source. Given the increase in flood storage volume, the proposed development will have no impact on the Owennagearagh River to the south of the site and at the R617/R579 junction.

A consequence of protecting the site and properties in Senandale from flood risk is that there is a predicted small and localised increase in water levels, up to 20mm for the 1:1,000 year flood event, on lands to the west of Senandale. These lands are already in Flood Zone A and have been earmarked for flood water storage in an adjoining development proposal. The potential increase in water levels of 20 mm in this area will not have any impact on the proposed access proposals or the development potential of the lands or indeed the adjacent Senandale.

Given the low risk of flooding identified on the site, which is not identified in the 2017 LAP, OPW website www.floodinfo.ie or mapping produced by the OPW for the Lee CFRAM study, the proposed development is consistent with the "sequential approach" advocated by Section 3.2 of the Flood Risk Guidelines and complies with "the broad philosophy underpinning the sequential approach in flood risk management".

In accordance with the sequential approach defined by the Flood Risk Guidelines a Justification Test was carried out within the context of the SSFRA, which the proposed development passes. Table 3.2 of the Flood Risk Guidelines highlights that the *'acceptability or otherwise of levels of residual risk should be made with consideration of the type and foreseen use of the development and the local development context'*. Given the local development context where the residual flood risk will be to lands which are identified as Flood Zone A and will be maintained as flood storage by the landowners as part of their development proposals, the residual risks are acceptable in accordance with the Guidelines.

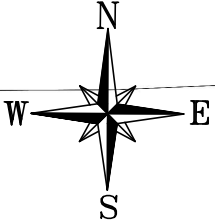
Overall, the proposed development will continue the implementation of the planned and sustainable delivery of housing in Tower. In conjunction with the delivery of housing, the proposed development will expand retail services to meet an identified demand, provide for improvements to the local road network, improve connectivity to Tower and protect adjoining properties from flood risk.

Based on the above, the proposed development represents the natural evolution and growth of the settlement and is in accordance with the sustainable development of the area.

Appendix A

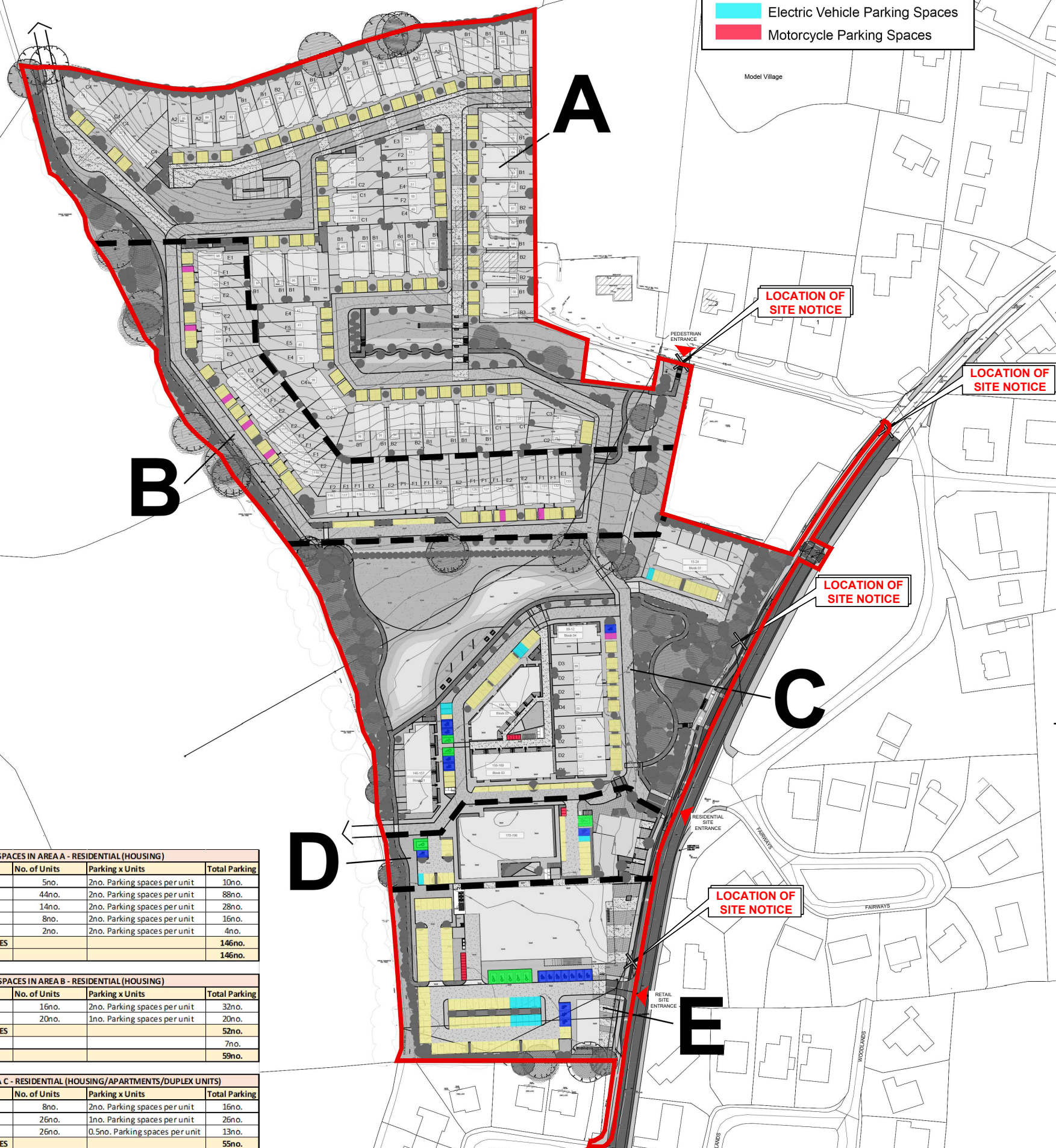
Parking Provision & Allocation

DO NOT SCALE. WORK TO FIGURED DIMENSIONS ONLY.
 ALL EXISTING DIMENSIONS TO BE CHECKED ON SITE.
 DRAWN ON AUTOCAD R2004 AT DEADY GAHAN ARCHITECTS LTD
 LAYERS ON THIS DRAWING COMPLY WITH BS 1192: PART 5



KEY PLAN

- Standard Parking Spaces
- Visitors Parking Spaces
- Disabled Parking Spaces
- Parent & Child Parking Spaces
- Electric Vehicle Parking Spaces
- Motorcycle Parking Spaces



VEHICLE PARKING SPACES IN AREA A - RESIDENTIAL (HOUSING)

Unit Types	No. of Units	Parking x Units	Total Parking
4 bed detached	5no.	2no. Parking spaces per unit	10no.
4 bed semi-detached	44no.	2no. Parking spaces per unit	88no.
3 bed semi-detached	14no.	2no. Parking spaces per unit	28no.
3 bed townhouse	8no.	2no. Parking spaces per unit	16no.
2 bed townhouse	2no.	2no. Parking spaces per unit	4no.
TOTAL NUMBER OF PRIVATE PARKING SPACES			146no.
TOTAL NUMBER OF PARKING SPACES			146no.

VEHICLE PARKING SPACES IN AREA B - RESIDENTIAL (HOUSING)

Unit Types	No. of Units	Parking x Units	Total Parking
3 bed townhouse	16no.	2no. Parking spaces per unit	32no.
2 bed townhouse	20no.	1no. Parking spaces per unit	20no.
TOTAL NUMBER OF PRIVATE PARKING SPACES			52no.
Visitors Parking			7no.
TOTAL NUMBER OF PARKING SPACES			59no.

VEHICLE PARKING SPACES IN AREA C - RESIDENTIAL (HOUSING/APARTMENTS/DUPLEX UNITS)

Unit Types	No. of Units	Parking x Units	Total Parking
4 bed townhouse	8no.	2no. Parking spaces per unit	16no.
2 & 3 bed duplex units	26no.	1no. Parking spaces per unit	26no.
1 & 2 bed GF apartments	26no.	0.5no. Parking spaces per unit	13no.
TOTAL NUMBER OF PRIVATE PARKING SPACES			55no.
Visitors Parking			1no.
Disabled Parking			2no.
Parent & Child Parking			5no.
Electric Vehicle Parking			5no.
TOTAL NUMBER OF PARKING SPACES			68no.

VEHICLE PARKING SPACES IN AREA D - 42 CHILD CRÉCHE & STEP DOWN APARTMENTS

Unit Types	Users	Parking Allocation	Total Parking
42no. Crèche	staff	1no. Parking space per 3no. Staff members	4no.
	visitors	1no. Parking space per 10no. Children plus	5no.
1 & 2 bed step down apartments	residents/visitors	1no. Visitors space per 3.5 apartments	8no.
Disabled Parking			2no.
Parent & Child Parking			2no.
Electric Vehicle Parking			2no.
TOTAL NUMBER OF PARKING SPACES			23no.

VEHICLE PARKING SPACES IN AREA E - COMMERCIAL AREA (FOOD STORE & CAFÉ WITH 2no. APT'S OVER)

Unit Types	Users	Total Parking
Foodstore/Café/2no. Apartments	staff/customer/residents	76no.
Disabled Parking		5no.
Parent & Child Parking		10no.
Electric Vehicle Parking		10no.
TOTAL NUMBER OF PARKING SPACES		101no.

N.B. There are 18no. Motorcycle parking spaces gathered in three different areas of the development

TOTAL NUMBER OF CAR PARKING SPACES (ENTIRE SITE)	397no.
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VEHICLE PARKING ALLOCATION
 SCALE 1:2000 @ A3

date	rev	name	chk	note
23.06.21	P1	LM	EJG	ISSUE FOR PLANNING

DEADY GAHAN
DG
 ARCHITECTS

EASTGATE VILLAGE, LITTLE ISLAND, CORK
 T: 021 4355018 W: WWW.DGARCHITECTS.IE
 EMAIL: INFO@DGARCHITECTS.IE

Project
 PROPOSED MIXED-USE DEVELOPMENT
 IN CLOGHROE, TOWER, CO. CORK

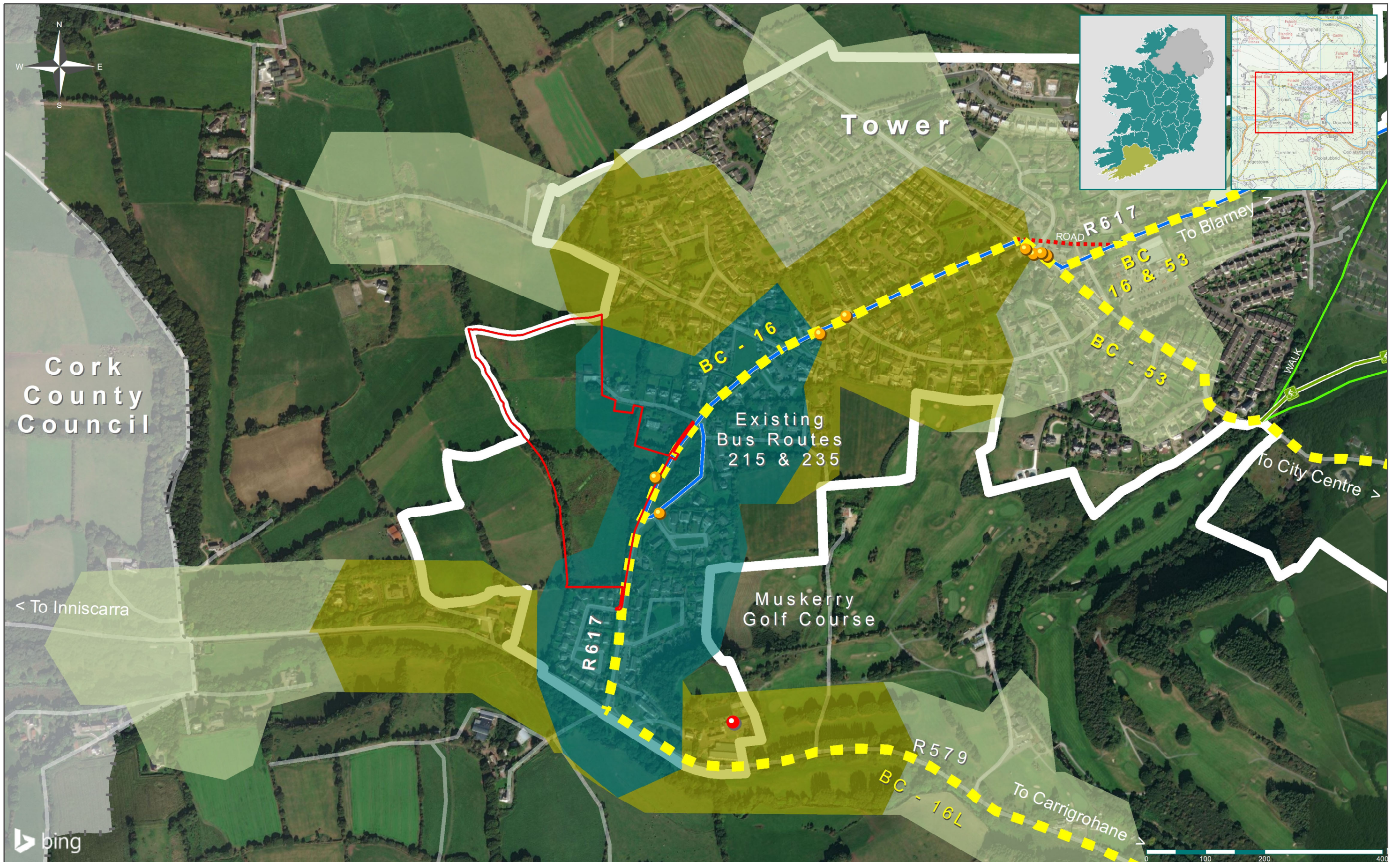
Drawing title
 PROPOSED VEHICLE PARKING ALLOCATION

Scale	Drawn	Checked	Date
1:2000 @ A3	LM	EJG	16.06.21
Project No.	Drw. No.	Revision	
20068	20068/P/014	P1	

Information | Comments | Tender | Construction

Appendix B

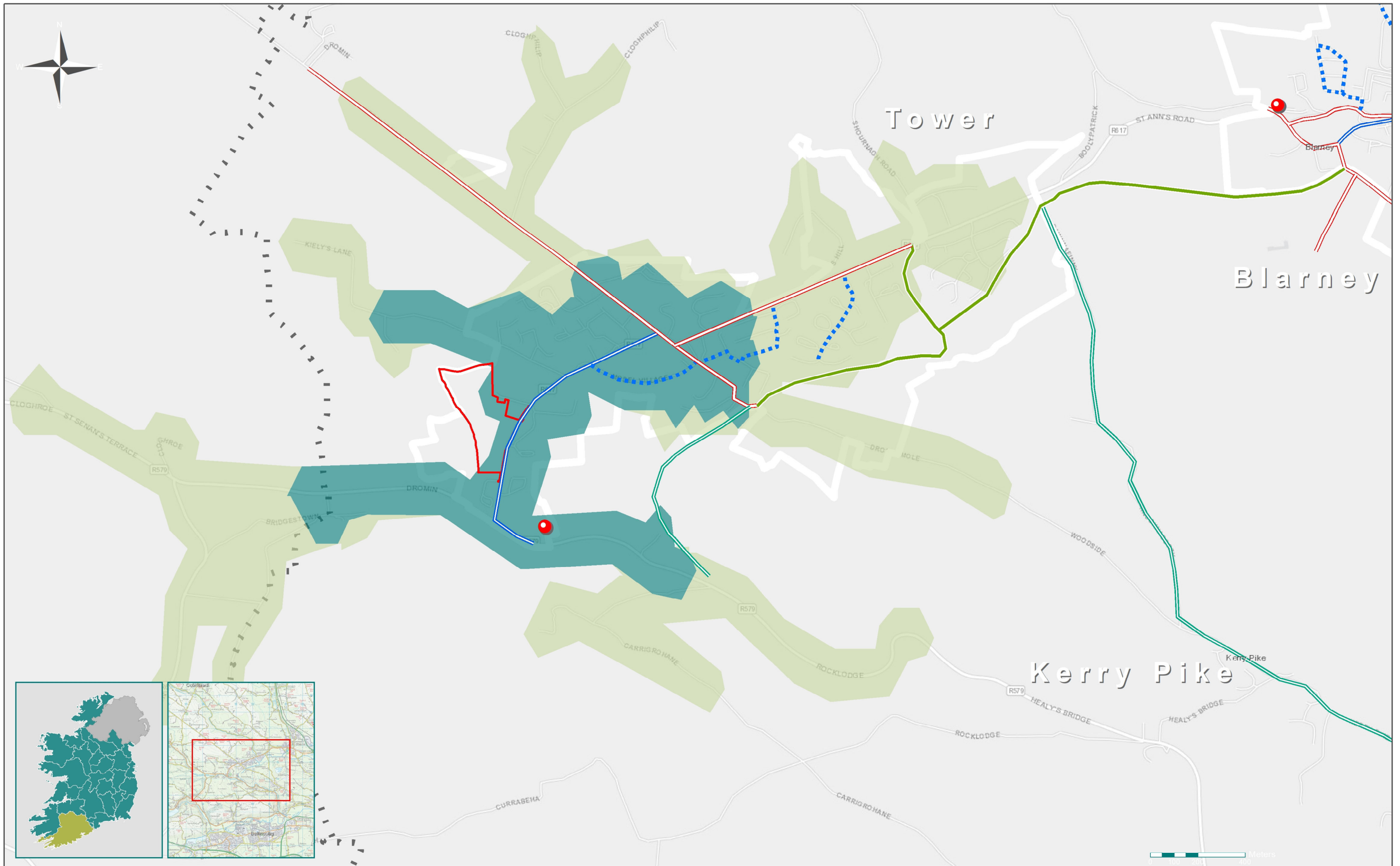
Connectivity Mapping



Legend

- Existing Bus Route
- - - Site Boundary
- Cork City Boundary
- Draft BusConnects
- Walking Travel Time from Site Access (Minutes)
 - 10
 - 15
 - 5
- Bus Stop
- Primary School
- Cork Metropolitan Area Cycle Network
- Greenway
- - - Specific Road Objective
- Specific Walkway Objective

Existing Bus Route 215 Cloghroe - Mahon via City Centre 30 Minutes Frequency	Draft BusConnects Route 16 - every 30 min Route 16L every 60 mins Route 53 every 2 hours
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Legend

- Site Boundary
- Cork City Boundary
- 5 minutes
- 10 minutes
- Primary School
- Primary
- Secondary
- Greenway
- - - Feeder
- Interurban

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