



Material Contravention Statement

Proposed Mixed-Use Strategic Housing Development at
Coolflugh, Cloghroe, Tower, Cork

Cloghroe Development Limited

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01. Introduction

1.1 PURPOSE OF STATEMENT

HW Planning have been appointed by Cloghroe Development Limited to prepare this statement to address aspects of the proposed Strategic Housing Development at Coolflugh, Cloghroe, Tower, Cork (“the proposed Cloghroe SHD”) that may be considered to materially contravene certain non-land use policies and objectives of the Cork County Development Plan 2014 (CDP) and/or the Blarney Macroom Municipal District Local Area Plan 2017 (LAP).

The Planning and Development (Housing) and Residential Tenancies Act, 2016 (“the 2016 Act”), empowers An Bord Pleanála to grant permission for a strategic housing development which materially contravenes policies and objectives of a Development Plan or Local Area Plan, other than in relation to the zoning of land. In these circumstances, the provisions of subsection 9(6) of the 2016 Act are relevant:

(6) (a) Subject to paragraph (b), the Board may decide to grant a permission for a proposed strategic housing development in respect of an application under Section 4 even where the proposed development, or part of it, contravenes materially the development plan or local area plan relating to the area concerned.

(b) The Board shall not grant permission under paragraph (a) where the proposed development, or part of it, contravenes materially the development plan or local area plan relating to the area concerned, in relation to the zoning of land.

(c) Where the proposed strategic housing development would materially contravene the development plan or local area plan, as the case may be, other than in relation to the zoning of the land, then the Board may only grant permission in accordance with paragraph (a) where it considers that, if Section 37(2)(b) of the Act of 2000 were to apply, it would grant permission for the proposed development.

In circumstances where: (i) the Board has the power to decide to grant permission for a proposed SHD where the proposed development contravenes the development plan or local area plan; (ii) the proposed Cloghroe SHD does not contravene the development plan or local area plan in relation to the zoning of land; then (iii) the provisions of section 37(2)(b) of the Planning and Development Act 2000 (“the 2000 Act”) are relevant to the Board’s consideration of this planning application. In this respect, subsection 37(2) states:

(2) (a) Subject to paragraph (b), the Board may in determining an appeal under this section decide to grant a permission even if the proposed development contravenes materially the development plan relating to the area of the planning authority to whose decision the appeal relates.

(b) Where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may only grant permission in accordance with paragraph (a) where it considers that -

(i) the proposed development is of strategic or national importance,

(ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or

(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, or

(iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

Section 8(1)(iv)(II) of the 2016 Act specifies that, where a proposed development is considered to materially contravene the relevant Development Plan or Local Area Plan (other than in relation to the zoning of the land), then the SHD application must include a statement indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000. A response to the relevant criteria above is provided in Section 03 of this report and demonstrates that one or more of the criteria in section 37(2)(b) are satisfied in respect of the proposed Cloghroe SHD, thereby enabling the Board to decide to grant permission, notwithstanding the material contravention of the subject policies and objectives of the Cork County Development Plan 2014 and Blarney Macroom Municipal District Local Area Plan 2017.

This statement addresses the material contraventions of certain policies and objectives contained in Cork County Development Plan 2014 (CDP) and Blarney Macroom Municipal District Local Area Plan 2017 – 2023 (LAP). Thereafter, the statement sets out the reasons why the Board should nonetheless grant permission, having regard to the provisions of section 37(2)(b) of 2000 Act.

1.2 DEVELOPMENT DESCRIPTION

The proposed Cloghroe SHD comprises the construction of a mixed-use residential and retail development and all ancillary site development works, including the demolition of 2 no. existing agricultural structures at Coolflugh, Cloghroe, Tower, Cork. The proposed development comprises the construction of 198 no. residential units, two storey creche, two storey café building and single storey retail food store. The proposed SHD provides for 117 no. dwelling houses consisting of 5 no. 4 bedroom detached houses, 44 no. 4 bedroom semi-detached houses, 8 no. 4 bedroom townhouses, 14 no. 3 bedroom semi-detached houses, 24 no. 3

bedroom townhouses and 22 no. 2 bedroom townhouses. The proposed development includes 81 no. apartment/duplex units consisting of 2 no. 3 bedroom, 35 no. 2 bedroom and 44 no. 1 bedroom units. 79 no. of the proposed apartment/duplex units will be provided in 6 no. 3 storey apartment buildings with ancillary communal areas and bicycle parking facilities. 2 no. apartment units will be provided at first floor level of a proposed café building to the south.

The proposed retail element of the SHD consists of a single storey retail food store with a net sales area of 1,315 m² which includes the sale of alcohol for consumption off premises, totem sign and ancillary building signage, servicing areas, surface car park and bicycle parking facilities. The proposed development also includes a proposed two storey café building with café on ground floor and 2 no. apartments at first floor level.

Access to the proposed development will be via 2 no. entrances from the R617, one which will serve the proposed residential development and one to serve the proposed retail development. A separate pedestrian entrance is to be provided from the existing cul-de-sac to the northeast of the site. The proposed SHD makes provision for the upgrade of the R617, including the installation of footpath/cycle infrastructure, signalised pedestrian crossing and the relocation of the existing public bus stop to the west of the R617. Ancillary site development works include flood defence works, public realm upgrades, amenity walks, public open spaces, an urban plaza to the east of the proposed retail unit and the undergrounding of existing overhead lines.

1.3 CONSISTENCY WITH LAND USE ZONING OBJECTIVE

The site is contained within the Development/Settlement Boundary of Tower as defined in the Blarney Macroom Municipal District Local Area Plan 2017 – 2023. The site itself is categorised as being within the ‘Existing Built-Up Area’ of Tower. Regarding development in ‘existing built-up areas’, objective ZU 3-1 of the Cork County Development Plan states:

“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.”

Sections 14.3.1 – 14.3.6 of the CDP expands further on appropriate development in ‘existing built-up areas’ which paragraph 14.3.1 stating.

“Areas of existing development are shown simply as ‘existing built-up area’ in the Local Area Plans. This approach has been taken in order to allow a more positive and flexible response to proposals for the re-use or re-development of underused or derelict land or buildings particularly in the older parts of the main towns. “Existing built-up areas” include all lands within a development boundary which do not have a specific zoning objective attached. Therefore, it includes a mix of land uses which may have existing buildings in place, brownfield lands and undeveloped greenfield lands within the development boundary.”

It is noted that section 2.4.9 of the LAP states as follows:

“This local area plan does not zone land for development within the villages. Rather each village has a development boundary and is assigned an ‘Overall Scale of New Development’. This figure is not a target to be reached, or an absolute maximum limit on development. Rather the ‘overall scale of growth’ figure is an indication of the number of additional dwellings which could reasonably be accommodated within a settlement over the lifetime of this Plan,

subject to other considerations of proper planning and sustainable development. Development within villages also has to be balanced in line with the overall strategy of the County Development Plan which seeks to establish an appropriate balance in the spatial distribution of future population growth so that the towns can accelerate their rate of growth and achieve a critical mass of population.”

Accordingly, pursuant to the objectives of the Cork County Development Plan 2014 as reflected in the Blarney Macroom Municipal District Local Area Plan 2017, it is clear that the use of the lands in respect of the proposed Cloghroe SHD is consistent with the land use zoning objective for the lands.

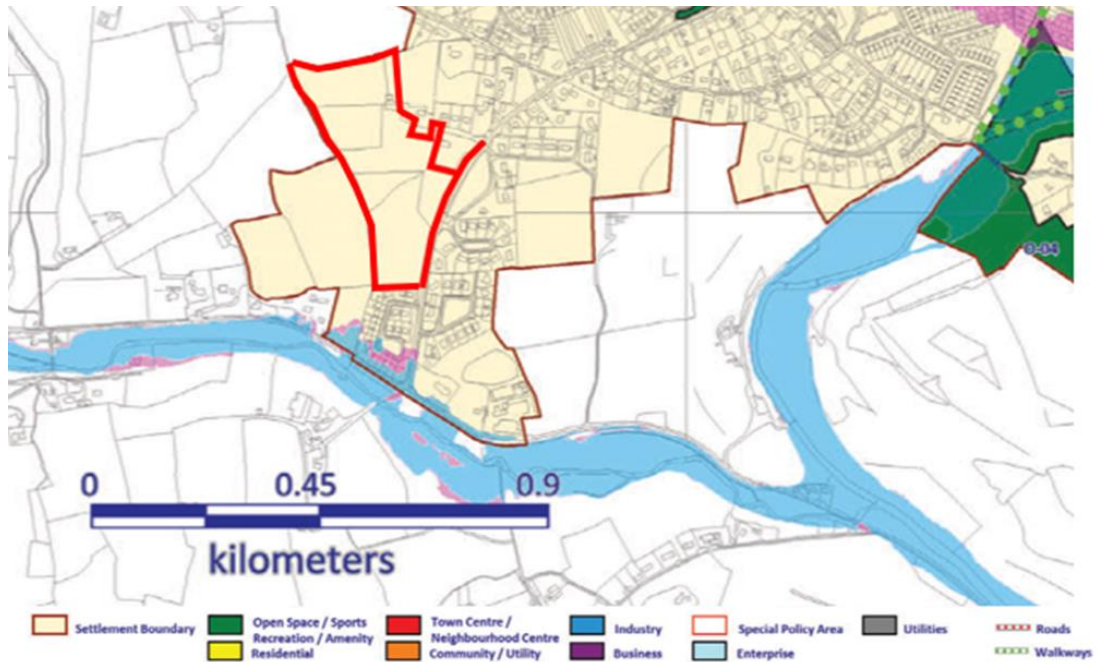


Figure 1.1 Site Location within Development/Settlement Boundary of Tower in the LAP

1.4 MATERIAL CONTRAVENTIONS OF DEVELOPMENT PLAN AND/OR LOCAL AREA PLAN

- 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.

02. Policy Background

2.1 NATIONAL POLICY

The key National Policies of relevance to the proposed development are.

- Project Ireland 2040: National Planning Framework;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009);
- Sustainable Urban Housing: Design Standards for New Apartments (2018 & 2020); and
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018).

2.1.1 Project Ireland 2040: National Planning Framework

One of the principal goals of the NPF is to deliver compact growth through the activation of strategic areas and achieving effective density and consolidation. Promoting the compact growth approach rather than a continued sprawl of urban development, is listed as the Framework's top priority and will be achieved by future developments complying with the following National Policy Objectives

National policy Objective 2A - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 3B - 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.

National Policy Objective 3c - 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

National Policy Objective 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 6 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 8 - Ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

National Policy Objective 11 - 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.

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.

Key Future Growth Enablers for Cork include.

- Progressing the sustainable development of new greenfield areas for housing, especially 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

2.1.2 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009)

The Guidelines (SRDUA), which informed the preparation of the CDP 2014 define appropriate locations for increased densities ¹. The subject lands are situated a short distance southwest of the existing village centre of Tower and can be defined as an 'edge of centre' location in context of the existing settlement and in accordance with the SRDUA.

The SRDUA defines 'small towns and villages' as settlements with a population ranging from 400 to 5,000 persons. Regarding housing densities 'edge of centre' sites in small towns and villages', section 6.11 of the SRDUA states.

¹ Section 5.3

“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 SRDUA identifies the following key overall messages regarding the future growth of these settlements.

- 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.”

- 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.

2.1.3 Sustainable Urban Housing: Design Standards for New Apartments (March 2018 & 2020)

These Guidelines which were adopted in December 2018 reinforced Government’s policy and advice in respect of increasing densities at suitable locations. The 2020 Guidelines are unchanged from the previous 2018 Guidance except in relation to the introduction of Specific Planning Policy Objective 9 which provides for a presumption against granting planning permission for shared accommodation/co-living development.

The Guidelines suggest 3 broad types of locations suitable for apartment developments including.

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

Section 2.4 of the Guidelines define Peripheral and/or Less Accessible Urban Locations as follows

“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:

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

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.”

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 located on the BusConnects network as identified in the Cork Metropolitan Area Transport Strategy (CMATS) and the service and network will be improved in the future, currently estimated as 2023, 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 Guidelines indicate that such areas are suitable for medium density development that may include a minority of apartment, but broadly less than 45 dwellings per hectare net.

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*”².

2.1.4 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

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:

“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:

- 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 “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 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.”*

² Section 1.10

2.2 LOCAL AND REGIONAL POLICY

The Regional Spatial Economic Strategy: Southern Region (Cork Metropolitan Area Strategic Plan) (2020) represents the relevant regional policy. The county and local Planning Policy context is currently set in accordance with the provisions of 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 Cork City Development Plan has yet to be made, the zoning and policy objectives for the site are those in the Cork County Development Plan 2014. Similarly, the lands are comprised in the Blarney Macroom Municipal District Local Area Plan 2017 having regard to subsection 30(2) of the Local Government Act 2019:

“(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 2017 remains in force for the area until such time as a new Local Area Plan or City Development Plan is prepared by the City Council.

2.2.1 Regional Spatial Economic Strategy: Southern Region (Cork Metropolitan Area Strategic Plan) (2020)

Key principles in developing the strategy for the Regional Spatial Economic Strategy (RSES) include;

- 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.

Some of the key specific aims include:

- 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.

Regional Planning Objective (RPO) 10 in the Regional Spatial Economic Strategy for the Southern Region outlines the aim to achieve Compact Growth in Metropolitan Area by.

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.

The RSES identifies the delivery of sustainable regeneration and growth (particularly compact growth) through effective sustainable transport, spatial land use planning and the delivery of sustainable higher densities.

RPO 26 – Towns and Villages states it is an objective.

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;

RPO 151 - Integration of Land Use and Transport states 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.

RPO 165 - Higher Densities

“Local Authorities, through appropriate Development Plan policies shall ensure the consolidation of 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 RSES places a significant emphasis on quality placemaking and the creation of new sustainable 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”.

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

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.

Cork MASP Policy Objective 7 states.

*“Identify and deliver strategic locations for increased residential and employment use at public transport interchange locations relating to the proposed Light Rail Transit Route, Suburban Rail and the strategic bus network, where high levels of accessibility by public transport can be achieved. **Seek sustainable higher densities where practicable at public transport nodal points.**” (emphasis added)*

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..... to achieve higher densities in the urban built up areas, supported by better services and public transport.

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.

2.2.2 Cork County Development Plan 2014 (CDP)

2.2.2.1 Density

Section 3.4 of the CDP includes policies for housing density. The CDP refers to the Ministerial Guidelines issued under section 28 of the Planning and Development Act 2000, which indicate that higher densities are potentially applicable in three categories of location found within County Cork including:

- Public Transport Corridors
- Outer Suburban/'Greenfield' Sites

The CDP recognises that Ministerial Guidelines suggest that average net densities in the general range of 35-50 dwellings per hectare should be encouraged and net densities of less than 30 dwellings/ha should be discouraged. The CDP indicates that these densities can be achieved whilst also promoting the construction of a variety of house types.

Cork County Council's stated aim is to achieve more efficient land utilisation through higher densities was, therefore, recognised in the CDP. However, the need to broaden the range of house types was given equal weight in the detailed planning of the areas within the County³. In order to accommodate these competing policy objectives a range of density guidelines including "High", "Medium A" and "Medium B" are outlined in County Development Plan Objective HOU 4-1.

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. Table 3.1 of the CDP provides a guide to the densities to be applied to lands zoned in the LAPs.

³ Section 3.4.15 Cork County Development Plan 2014

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 Blamey 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 2.1 Table 3.1 of CDP

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 2.2 CDP Objective HOU 4-1

Table 3.1 of the CDP 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 population⁴. 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 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."

2.2.2.1 Car Parking Standards

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."

2.2.2.2 Scale of Development

Tower is categorised as a 'key village' settlement in the settlement hierarchy of the CDP and the Blarney Macroom Municipal District. CDP Objective CS 3-2 states the strategic aim of these settlements is to.

"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 wastewater infrastructure is available. Supporting the retention and improvement of key social and community facilities and inter urban public transport."

Regarding general objectives for 'Key Villages' Objective GO-01 of the 2017 LAP states.

⁴ According to 2016 Census figures, Tower has a population of 3,421 no. people.

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.

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

Table 4.1: Appropriate Scale of Development for Key Villages				
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/Enniskeneane	344	44	195	20
Ballingeary	96	18	60	15
Ballymakeery/ Ballyvourney	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.

Figure 2.3 Table 4.1 – LAP

We note the footnote of Table 4.1 which provides a degree of flexibility regarding the normal recommended scale of any individual residential development in key village settlement.

“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.”

2.3 NATIONAL POLICY

The key National Policies of relevance to the proposed development are.

- Project Ireland 2040: National Planning Framework;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009);
- Sustainable Urban Housing: Design Standards for New Apartments (2018 & 2020); and
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018).

2.3.1 Project Ireland 2040: National Planning Framework

One of the principal goals of the NPF is to deliver compact growth through the activation of strategic areas and achieving effective density and consolidation. Promoting the compact

growth approach rather than a continued sprawl of urban development, is listed as the Framework's top priority and will be achieved by future developments complying with the following National Policy Objectives

National policy Objective 2A - A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

National Policy Objective 3B - 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.

National Policy Objective 3c - 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

National Policy Objective 4 - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 6 - Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 8 - Ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000
Cork - City and Suburbs	209,000	50-60%	105,000 - 125,000	314,000
Limerick - City and Suburbs	94,000	50-60%	47,000 - 56,000	141,000
Galway - City and Suburbs	80,000	50-60%	40,000 - 48,000	120,000
Waterford - City and Suburbs	54,000	50-60%	27,000 - 32,000	81,000

National Policy Objective 11 - 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.

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.

Key Future Growth Enablers for Cork include.

- Progressing the sustainable development of new greenfield areas for housing, especially 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

2.3.2 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) (2009)

The Guidelines (SRDUA), which informed the preparation of the CDP 2014 define appropriate locations for increased densities⁵. The subject lands are situated a short distance southwest of the existing village centre of Tower and can be defined as an ‘edge of centre’ location in context of the existing settlement and in accordance with the SRDUA.

The SRDUA defines ‘small towns and villages’ as settlements with a population ranging from 400 to 5,000 persons. Regarding housing densities ‘edge of centre’ sites in small towns and villages’, section 6.11 of the SRDUA states.

“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 SRDUA identifies the following key overall messages regarding the future growth of these settlements.

- 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.”

- 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”

⁵ Section 5.3

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

2.3.3 Sustainable Urban Housing: Design Standards for New Apartments (March 2018 & 2020)

These Guidelines which were adopted in December 2018 reinforced Government's policy and advice in respect of increasing densities at suitable locations. The 2020 Guidelines are unchanged from the previous 2018 Guidance except in relation to the introduction of Specific Planning Policy Objective 9 which provides for a presumption against granting planning permission for shared accommodation/co-living development.

The Guidelines suggest 3 broad types of locations suitable for apartment developments including.

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

Section 2.4 of the Guidelines define Peripheral and/or Less Accessible Urban Locations as follows

"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:

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

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors."

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 located on the BusConnects network as identified in the Cork Metropolitan Area Transport Strategy (CMATS) and the service and network will be improved in the future, currently estimated as 2023, 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 Guidelines indicate that such areas are suitable for medium density development that may include a minority of apartment, but broadly less than 45 dwellings per hectare net.

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”⁶.

2.3.4 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

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:

“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:

- 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 “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 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.”*

⁶ Section 1.10

03. Material Contraventions

3.1 RELEVANT POLICIES AND OBJECTIVES

The proposed development materially contravenes the Cork County Development Plan 2014 and Blarney Macroom Municipal District Local Area Plan 2017 in the following ways.

- The proposed development represents a density of 35 units per hectare (of the developable residential area) which is in excess of the Medium B density range of 12-25 units per hectare, and therefore materially contravenes County Development Plan Objective HOU 4-1: Housing Density on Zoned Land.
- The proposed development represents an underachievement of Cork County Council's car parking standards are outlined in Table 1a, Appendix D of the County Development Plan, contrary to the provisions of section 10.4.8 of the Development Plan.
- The proposed development exceeds the '*normal recommended scale of any individual scheme*' of 40 no. units and the '*overall scale of development*' for Tower of 182 no. units during the lifetime of the 2017-2023 Local Area Plan as identified in LAP Objective GO-01 and table 4.1 of the Local Area Plan.

3.2 JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

In circumstances where the proposed Cloghroe SHD constitutes a material contravention of Objective HOU 4-1 of the Development Plan in relation to housing density, car parking standards identified in Table 1a, Appendix D of the County Development Plan, and the future scale of development in Tower identified in Table 4.1 of the Local Area Plan. The justification for deciding to grant permission in circumstances of such a material contravention is set out below, as required under the relevant criteria set out under Section 37(2)(b) of the 2000 Act, as amended.

First, for ease of reference, the relevant policies and objectives of the Cork County Development Plan and Blarney Macroom Municipal District Area Local Area Plan, which the proposed development materially are outlined below followed, secondly, by a demonstration of the manner in which section 37(2)(b) considerations apply.

We consider that the proposed development should be permitted pursuant to Section 37(2)(b)(iii) and (iv) of the 2000 Act which state respectively.

" 37(2)(b)(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."

37(2)(b)(iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

3.2.1 Density

The proposed development represents a net density of 35 units per hectare ⁷, exceeds the Medium B density range of 12-25 units per hectare defined in Objective HOU 4-1 in the Cork County Development Plan 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. The 2016 Census confirms Towers population as 3,421 no. people.

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.

3.2.1.1 Application of Section 37 (2)(b)(iii) Considerations to the Proposed Development

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.

The following section demonstrates how 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 Cork County Development Plan 2014 and Blarney Macroom Municipal District Local Area Plan 2017. These include:

- Project Ireland: National Planning Framework 2040
- Regional Spatial & Economic Strategy for the Southern Region (2019)
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (Apartment Guidelines 2018)
- Sustainable Residential Developments in Urban Areas (SRDUA) (2009)
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018)

3.2.1.1.1 *Project Ireland: National Planning Framework 2040 (NPF)*

The NPF seeks to increase densities and building heights in appropriate locations to consolidate urban sprawl, increase the sustainability of public transport networks and meet the housing needs of our growing population.

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 Irelands five largest cities and suburbs. Towers' location within the wider Cork Metropolitan Area, the settlement's 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.

⁷ Of the Residential developable site area, 5.6 hectares

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 will 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.

3.2.1.1.2 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. The timetable demonstrating the frequency and first/last times of the 215 No. bus route is included in Appendix B of this statement. 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) 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 normally operates 2 no. services every hour, approximately 180 no. bus spaces are available from the Coolflugh (Cloghroe) bus stop every hour with approximately 23,000 no. passengers per week availing of the route. This reflects that there is sufficient current bus capacity to serve the proposed development.

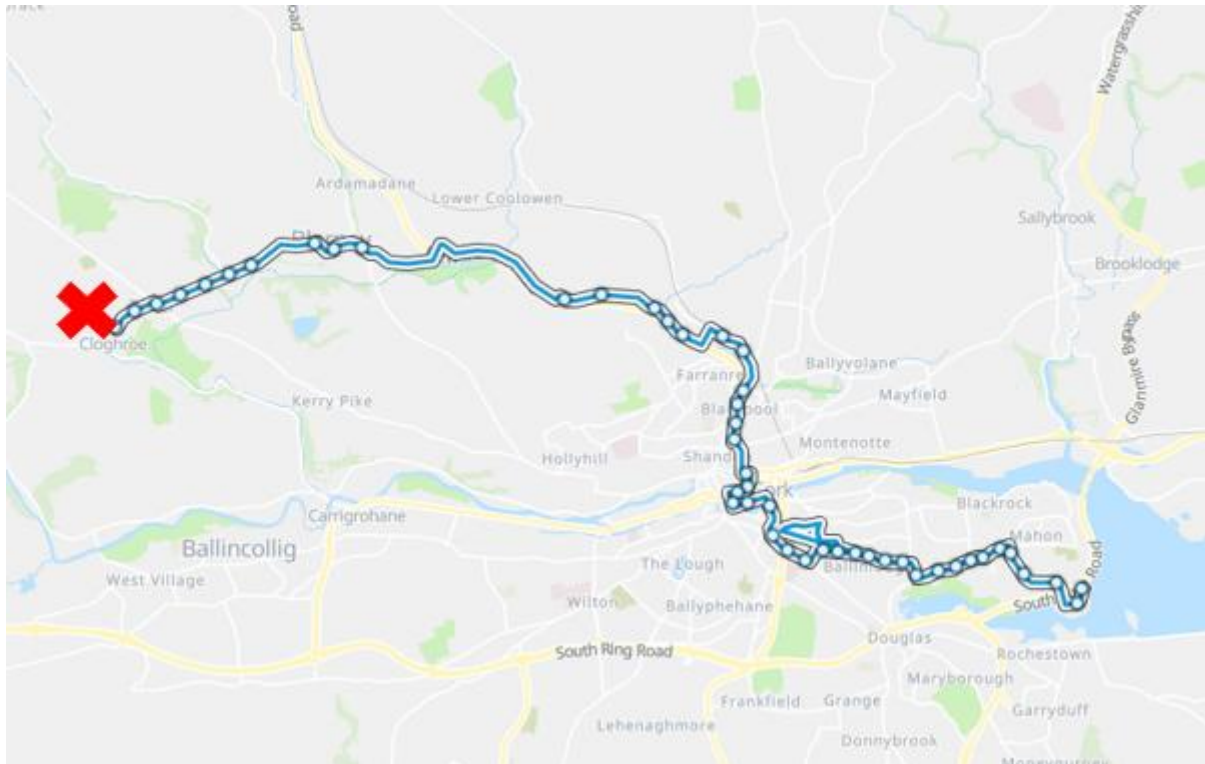


Figure 3.1 215 No. Bus Route – Ste Location - Red 'X'

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 BusConnects⁸ envisages that there will be a further future improvement in bus services serving the settlement of Tower as part of CMATS. Draft BusConnects identifies the following potential bus routes which may serve Tower in the future.

- Cloghroe – Cork Bus Station (Draft BusConnects Reference: 16)
- Ballincollig to Cork Bus Station via Blarney (Draft BusConnects Reference: 16L)

⁸ <https://busconnects.ie/busconnects-cork/>

- Blarney to Cork Bus Station via Kerry Pike (Draft BusConnects Reference: 53)

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’⁹ 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 proposed SHD will 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.

3.2.1.1.1 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 build upon the provisions of the NPF. Under subsection 9(6) of the 2016 Act, An Bord Pleanála may grant permission for a Strategic Housing Development where the proposed development, or a part of it, contravenes materially the development plan or local area plan relating to the area concerned, except where it contravenes materially the development plan or local area plan relating to the area concerned, in relation to the zoning of the land.

The 2018 Apartment Guidelines state:

“These guidelines have been issued by the Minister for Housing, Planning and Local Government under Section 28 of the Planning and Development Act 2000 (as amended). Planning authorities and An Bord Pleanála are required to have regard to

⁹ Page 368 of the RSES

the guidelines and are also required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions.

Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements.”

Both the County and Local Area Plan pre-date the NPF and RSES and various Section 28 Ministerial Guidance documents such as the 2018 Building Height Guidelines.

The 2018 Building Height Guidelines contain unequivocal support for higher density, compact developments, particularly in accessible urban areas. SPPR 4 of the 2018 Building Height Guidelines makes compliance with the minimum densities outlined in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 (SRDUA) a requirement.

SPPR 4 - 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:

- 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 “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 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.*

Having regard to the above and the provisions of the 2018 Apartment Guidelines and SPPR4 of the 2018 Building Height Guidelines, the Board should note the provisions of section 9(6)(b) of the 2016 Act, which expressly provides that:

(6) (a) Subject to paragraph (b), the Board may decide to grant a permission for a proposed strategic housing development in respect of an application under Section 4 even where the proposed development, or part of it, contravenes materially the development plan or local area plan relating to the area concerned.

Accordingly, in deciding whether to grant permission under subsection 9(6), the Board should have regard to the fact that SPPR4 of the 2018 Building Height Guidelines applies instead of the relevant provisions of the development plan, and the Board can approve the proposed development under section 9(6) of the 2016 Act, notwithstanding any potential conflicting policies / objectives of the Development Plan.

In accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, the subject site is an ‘edge of centre’ location. Section 6.11 of 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.”

[Emphasis added]

The Apartment Guidelines 2018 contains similar guidance, but do not contain any Special Planning Policy Requirements in terms of density. In accordance with these Apartment Guidelines 2018, the proposed development site would be considered to be an a ‘*Peripheral and/or Less Accessible Urban Location*’. The March 2018 Guidelines indicate that such areas are suitable for medium density development that may include a minority of apartment, but broadly less than 45 dwellings per hectare net.

As referenced previously, the net density of the proposed development is 35 units per hectare of the developable residential site area, which is clearly in excess of the Medium B density recommendations of 12-25 units per hectare in Table 3.1 of the County Development Plan. This density is, however, consistent with SPPR 4 of ‘Building Height Guidelines 2018’ which make compliance with the density range of 20-35 units per hectare outlined in the SRDUA requirements.

‘Net density’, is defined in Appendix A of the SRDUA as.

“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:

- *access roads within the site;*
- *private garden space;*
- *car parking areas;*
- *incidental open space and landscaping; and*
- *children’s play areas where these are to be provided.*

It therefore excludes:

- *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. Figure 3.2 as shown 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.

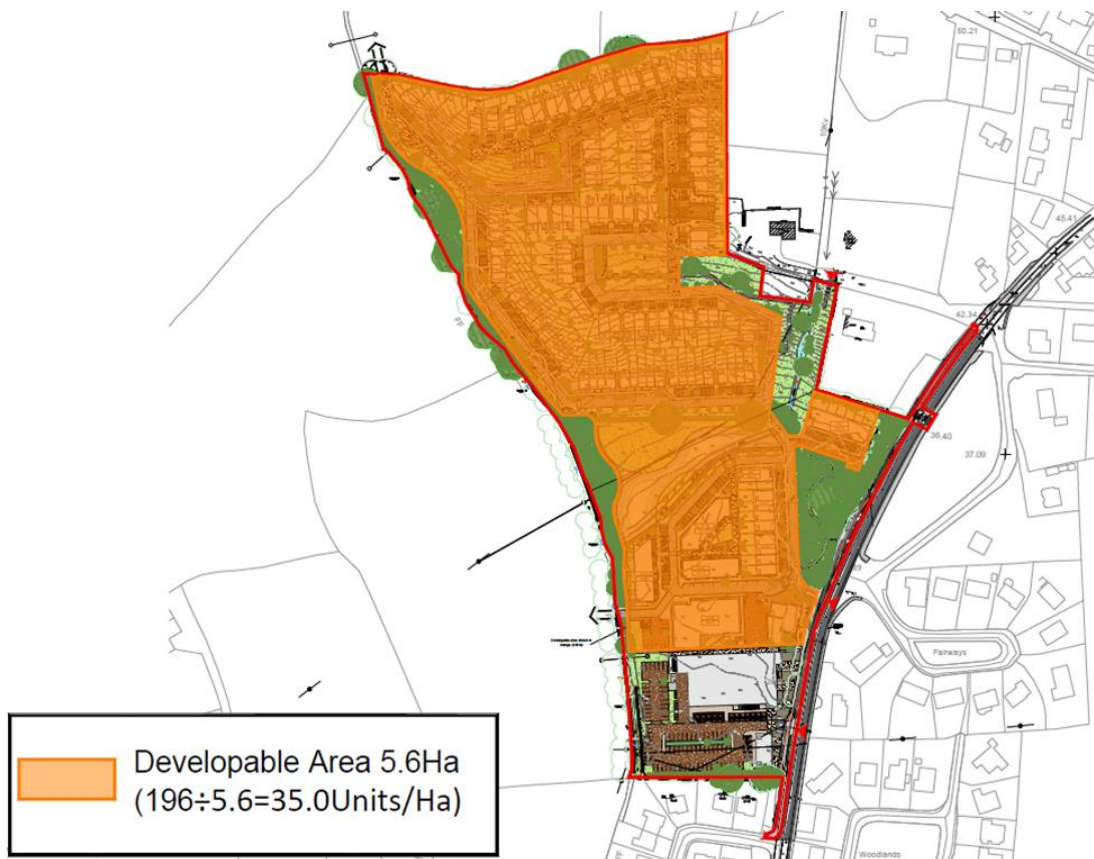


Figure 3.2 Net Developable Areas – Net Density Calculation

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 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.

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.

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)”

3.2.1.1.1 Sustainable Residential Developments in Urban Areas 2009 (SRDUA)

Section 6.11 of the SDUA stated in section 3.2.1.1.3 above refers to an appropriate density range of 20-35 units per hectare at ‘*edge of centre*’ locations in smaller towns and villages. As demonstrated above and in the accompanying Planning Report/Statement of Consistency, the proposed development is consistent with this guidance.

The proposed development provides for 117 no. dwelling houses consisting of 5 no. 4 bedroom detached houses, 44 no. 4 bedroom semi-detached houses, 8 no. 4 bedroom townhouses, 14 no. 3 bedroom semi-detached houses, 24 no. 3 bedroom townhouses and 22 no. 2 bedroom townhouses.

The proposed development also includes 81 no. apartment/duplex units consisting of 2 no. 3 bedroom, 35 no. 2 bedroom and 44 no. 1 bedroom units. 79 no. of the proposed apartment /duplex units will be provided in 6 no. 3 storey apartment buildings with ancillary communal areas and bicycle parking facilities. 2 no. apartment units will be provided at first floor level of a proposed café building to the south of the site. 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.

As required by Section 6.11 of the SRDUA the proposed development provides for a wide range of accommodation which will assist in achieving a successful transition from central areas to areas of the settlement to the edge of the settlement where the site is located.

3.2.1.2 Application of Section 37 (2)(b)(iv) Considerations to the Proposed Development

Point iv - permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

Recent patterns of development in the area is for development which is denser than the 12-25 unit Medium B density identified in the current LAP. In particular we note the most recently permitted, multi-unit residential scheme to the north of the settlement (Cork City Council Reference 20/39202 granted on 19th May 2021) reflects a development of 36 no. residential units on net site area of 1.37 hectares, reflects a net density of 26.3 units per hectare, also in excess of the Medium B density recommendations of 12-25 units per hectare in Table 3.1 of the County Development Plan.

3.2.1.3 Conclusion on Density

In the circumstances, the Board may to decide to grant permission for the proposed Cloghroe SHD, notwithstanding the material contravention of the provisions of the development plan in respect of density.

3.2.2 Car Parking Provision

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 Dedy Gahan Architects, which is attached as Appendix A of this Statement. As highlighted the parking strategy for the proposed development allocates parking on the basis of housing type and likely demands of future residents.

Pursuant to the provisions of section 10.4.8 of the CDP, Cork County Council's car parking standards are outlined in Table 1a, Appendix D of the CDP. 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 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.

Within Area D, parking for the proposed 1 and 2 bedroom stepdown apartments is provided on the basis of 1 space 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.

The proposed parking provision is not in accordance with the County Development Plan standards, which were adopted in 2014 and appear to be outdated given the progress made in the intervening period in terms of sustainable travel. In accordance with Section 4.22 of the 2018 Apartment Guidelines the proposed development provides for a minimum of one space for most apartment units within the scheme with the exception of the proposed sheltered units, which serve a very specific need and within which cohort car ownership is low.

3.2.2.1 Application of Section 37 (2)(b)(iii) Considerations to the Proposed Development

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.

The following section demonstrates how the proposed car parking provision is 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 Cork County Development Plan 2014 and Blarney Macroom Municipal District Local Area Plan 2017. These include:

- Project Ireland: National Planning Framework 2040

- Regional Spatial & Economic Strategy for the Southern Region (2019)
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (Apartment Guidelines 2018)

3.2.2.1.1 *Project Ireland: National Planning Framework 2040 (NPF)*

The NPF does not directly refer to car parking standards for various uses. However, we note references within the NPF which states that ‘*performance-based design standards*’ should be applied to reflect the particular context of settlements. Section 4.5 of the NPF ¹⁰ states that.

“In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”

This is also reflected in National Policy Objective 13 of the NPF which states.

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”

The NPF also places a strong emphasis on the consolidation of walking and cycling mobility over vehicular based transport. This is reflected in ‘National Policy Objective 27, ‘Healthy Communities’ which aims to.

“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.”

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.

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

Like the NPF, the RSES does not specifically refer to car parking standards for residential development, but places strong emphasis on reducing reliance on the private car and promoting walking, cycling and public transport as alternative modes of transport. The following objectives in the RSES are of particular relevance:

¹⁰ Page 67 of NPF

RPO 152 – Local Planning Objectives states it is an objective to

“Where possible, developments will provide for filtered permeability. This will provide for walking, cycling, public transport and private vehicle access but at the same time will restrict or discourage private car through trips”

RPO 157 – Local Transport Plans (LTP) states.

“Plan and target actions for modal shift to sustainable transport modes to facilitate a modal shift away from car dependence.”

RPO 163 – Sustainable Mobility Targets states it is an objective that.

Significant progress is sought for the Southern Region to reduce the modal share of private car travel and increase the modal share of travel by walking, cycling, public transport and car sharing.

National Smarter Travel Targets are supported which seek to achieve a reduction of work-related commuting by private car to 45% of modal share by 2020 and commuting by walking, cycling, public transport and car sharing to 55% of modal share by 2020. Such targets are nationwide average targets and higher achievement under lower tiered plans such as for metropolitan areas are supported.

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. Proposed public realm upgrades include.

- 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.

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.

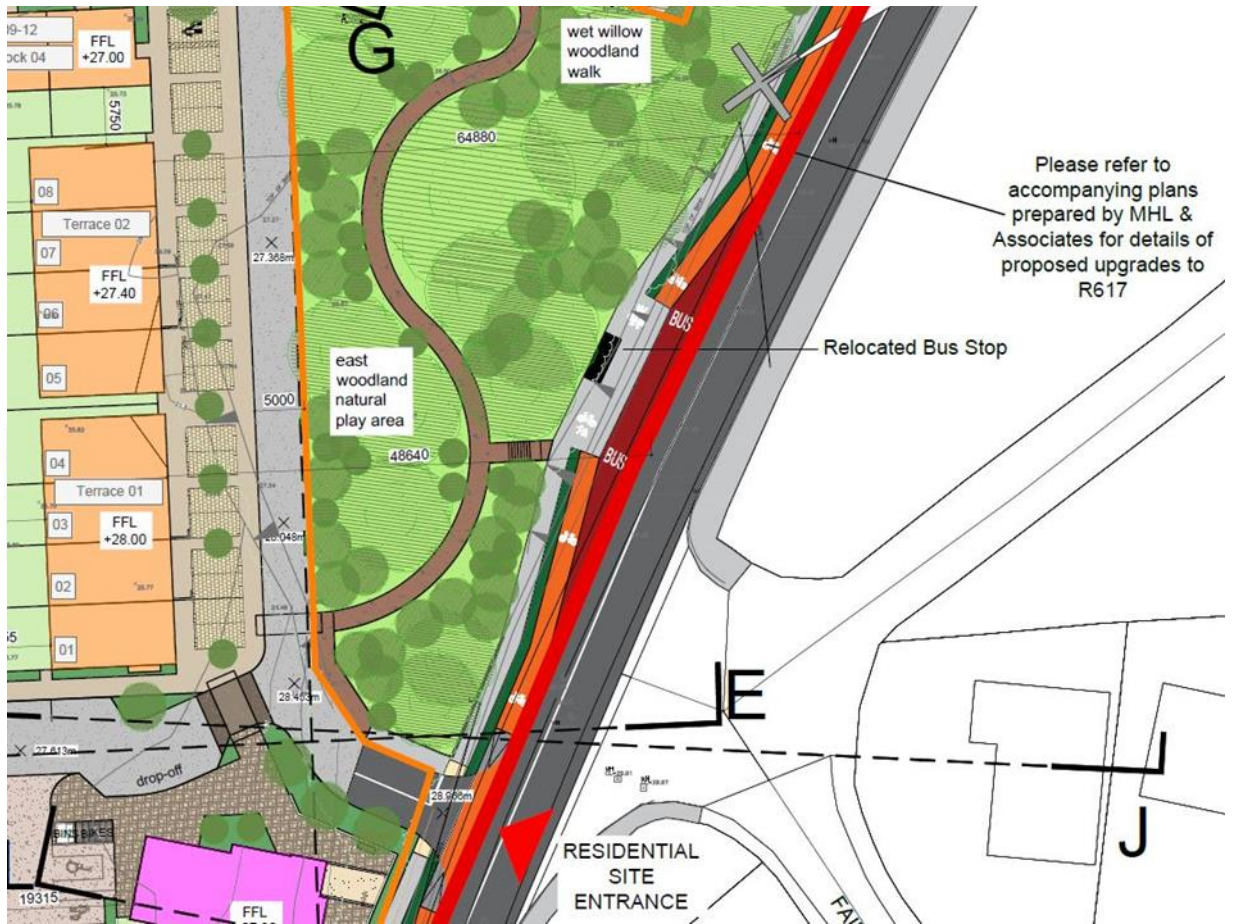


Figure 3.3 Pedestrian Link to Bus Stop Proposed Cross Section of R617

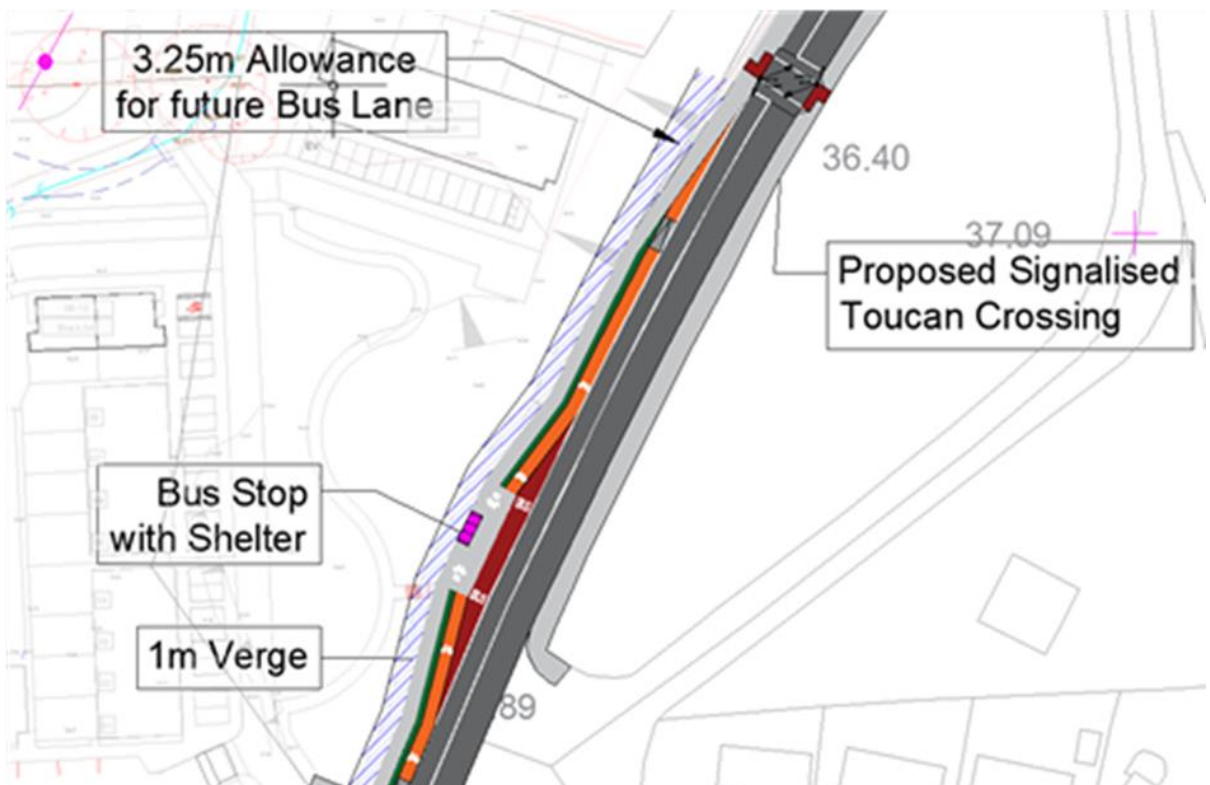


Figure 3.4 Proposed Upgraded Bus Stop with Shelter on the R617

3.2.2.1.1 *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2018 & 2020 (Apartment Guidelines 2018)*

Section 1.10 of the Apartment Guidelines 2018 indicate that a removal of “requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs”.

Section 4.16 of the Guidelines promotes the prioritisation of cycling in urban locations over car-based travel and

“In particular, planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities.”

Regarding car parking section 4.18 of the Guidelines states that:

“The quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.”

With sections 4.22-4.27 outlining guidance at ‘Peripheral and/or Less Accessible Urban Locations’ Section 4.22 states 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.’

Regarding the proposed apartments, within Area C (refer to accompanying parking plan prepared by Deady Gahan Architects) the proposed development provides for 26 no. 2/3 bedroom duplex apartments which will be provided with 26 no. car parking spaces. This is consistent with guidance contained in section 4.22 which identifies that in general one car parking space per unit should be provided per apartment unit.

An additional 26 no. 1/2 bedroom apartment units are provided within Area C and equipped with 13 no dedicated car parking spaces. Within Area C, an additional 13 no. car parking spaces are also provided to accommodate visitors, electric vehicle charging points, disabled parking and ‘parent and child’ parking. Area C is the area of the site most proximate to proposed relocated bus stop and public realm upgrades on the R617. As evidenced in the Connectivity Mapping which accompanies this application future residents will be within 10-15 minutes walking distance of all amenities in the town.

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

The proposed development also provides for 27 no. 1/2 bedroom stepdown units for elderly residents within an apartment building to the north of the proposed retail unit. Due to the nature and operational needs of future residents of these units a reduced car parking standard is considered appropriate with 8 no dedicated car parking spaces and 6 no. disabled/electric and ‘parent/child’ spaces provided in this area of the site. The proposed step-down apartment

building is within walking distance of the local post office, bus stop, beauticians, church and retail opportunities resulting in a reduced demand for car parking resulting from these units.

3.2.2.2 Conclusion on Car Parking

The County Development Plan identifies a standard spaces per house and 1.25 spaces per apartment in table 1a, Appendix D. Although the proposed development does not provide the quantum of car parking as set out in table 1a, Appendix D of the CDP, the parking strategy for the proposed development is consistent with the NPF, RSES and Apartment Guidelines 2018 in terms of promoting more sustainable modes of transport and reducing car dependency.

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. The nature of these improvements is previously referred to in this Material Contravention Statement. Therefore, 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

3.2.3 Scale of Development

The proposed development of 198 no. residential units materially contravenes Local Area Plan General Objective GO-01 'General Objectives for Key Villages' which states that.

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.

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

Table 4.1 of the LAP outlines that the normal recommended scale of any individual scheme in Tower during the lifetime of the Plan is 40 no. units with the 'overall scale of development' in the settlement 182 no. units during the same time period. We note the 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."

3.2.3.1 Application of Section 37 (2)(b)(iii) Considerations to the Proposed Development

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.

The following section demonstrates how the proposed car parking provision is 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 Cork County Development Plan 2014 and Blarney Macroom Municipal District Local Area Plan 2017. These include:

- Project Ireland: National Planning Framework 2040
- Regional Spatial & Economic Strategy for the Southern Region
- Sustainable Residential Developments in Urban Areas (SRDUA) (2009)

3.2.3.1.1 *Project Ireland: National Planning Framework 2040 (NPF)*

The NPF seeks to increase the delivery of housing at appropriate locations, particularly in the five largest cities and suburban areas. The following objectives in the NPF are of particular relevance

National Policy Objective 3b – 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 footprint

National Policy Objective 3c – 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 footprint

National Policy Objective 11- 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

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

A review of the National Policy Objectives of the NPF confirms there is an increased emphasis on delivering compact, higher density residential development in existing settlements in the Cork Metropolitan Area.

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

Similarly, to the NPF, the RSES aims to consolidate new development in the Cork Metropolitan Area, with a specific emphasis on delivering additional residential development in existing settlements and those serviced by high quality public transport links. Tower is situated within the Cork MASP (Metropolitan Area Strategic Plan) area as defined in the RSES. RPO 10 of the RSES which aims to.

“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.”

Regarding the development of towns and villages in the southern region, RPO 26 states that particular settlements in the region ‘can play an enhanced role at sub-regional level to drive the development of their area’. The following objectives of the RSES and specifically the Cork MASP are of particular relevance to the proposed scale of development.

Cork MASP Policy Objective 1(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.

Cork MASP Policy Objective 1(d) – The Cork MASP allows flexibility to respond to changes in planning policy, infrastructure requirements and priorities that will arise in the area which will be added to Cork City as a result of the boundary extension, framed by the principles set out in RPO 10 Compact Growth in Metropolitan Areas.

Cork MASP Policy Objective 7 – “Identify and deliver strategic locations for increased residential and employment use at public transport interchange locations relating to the proposed Light Rail Transit Route, Suburban Rail and the strategic bus network, where high levels of accessibility by public transport can be achieved.

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..... To achieve higher densities in the urban built up areas, supported by better services and public transport.

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.

The RSES is clear that establishing that increased levels of housing should be prioritised at areas served by high quality public transport links and will contribute to compact urban development. MASP objective 1(d) acknowledges that there needs to be a degree of flexibility required to appropriately respond to Cork City Boundary Extension in 2019 with MASP objective 7 seeking to delivered increased residential levels at areas which are located on the Cork Metropolitan public transport network. As referenced, the subject lands are situated immediately adjacent to the terminus of the 215 no. bus route which is likely to result in improved services following the implementation of BusConnects in CMATS.

The MASP is led by the guiding principles identified above which include the acceleration of housing delivery and an objective to achieve higher densities in the urban built up areas, supported by better services and public transport.

3.2.3.1.3 Sustainable Residential Developments in Urban Areas (SRDUA) (2009)

As referenced previously, the SRDUA defines 'small towns and villages' as settlements with a population ranging from 400 to 5,000 persons and includes the settlement of Tower. Regarding the scale of development in small towns and villages, section 6.3 of the SRDUA states.

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

Because of the scale of smaller towns and villages, it is generally preferable that overall expansion proceeds on the basis of a number of well-integrated sites within and around the town/village centre in question rather than focusing on rapid growth driven by one very large site.

*Above all, it is the function of local area plans and any supplementary local development frameworks to make recommendations regarding the appropriate scale of overall development and any individual new housing schemes and to match the scale and grain of existing development within an overall development boundary. **For example, where a small town or village has grown rapidly in recent years, the LAP might recommend the phased development of a variety of sites over time, subject to a provision that no one proposal for residential development should increase the existing housing stock ¹¹ by more than 10-15% within the lifetime of the development plan or local area plan***

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 several 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).

A review of recent planning activity in Tower, also confirms the settlement has outperformed its housing delivery targets identified in the 2017 LAP. This is set in the context of wider Metropolitan Cork where the majority of settlements are falling behind in meeting targets due to infrastructural constraints and other matters.

As of January 2022, 224 no. residential units have been granted permission (203 of which are either completed or currently under construction) in the settlement. A further 89 no. residential units are currently in the planning application process. In summary, this represents that there are 312 no. additional permitted/proposed residential units in Tower since the adoption of the

¹¹ Including permitted and committed development.

LAP. We also note that since the adoption of the LAP in 2017, two separate residential developments in the settlement have been permitted which have exceeded the 40 unit per individual residential development threshold identified in Table 4.1 of the LAP. A summary of all significant permitted planning applications for residential development which have occurred in Tower since the adoption of the LAP is provided in Table 01 below.

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 36 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.

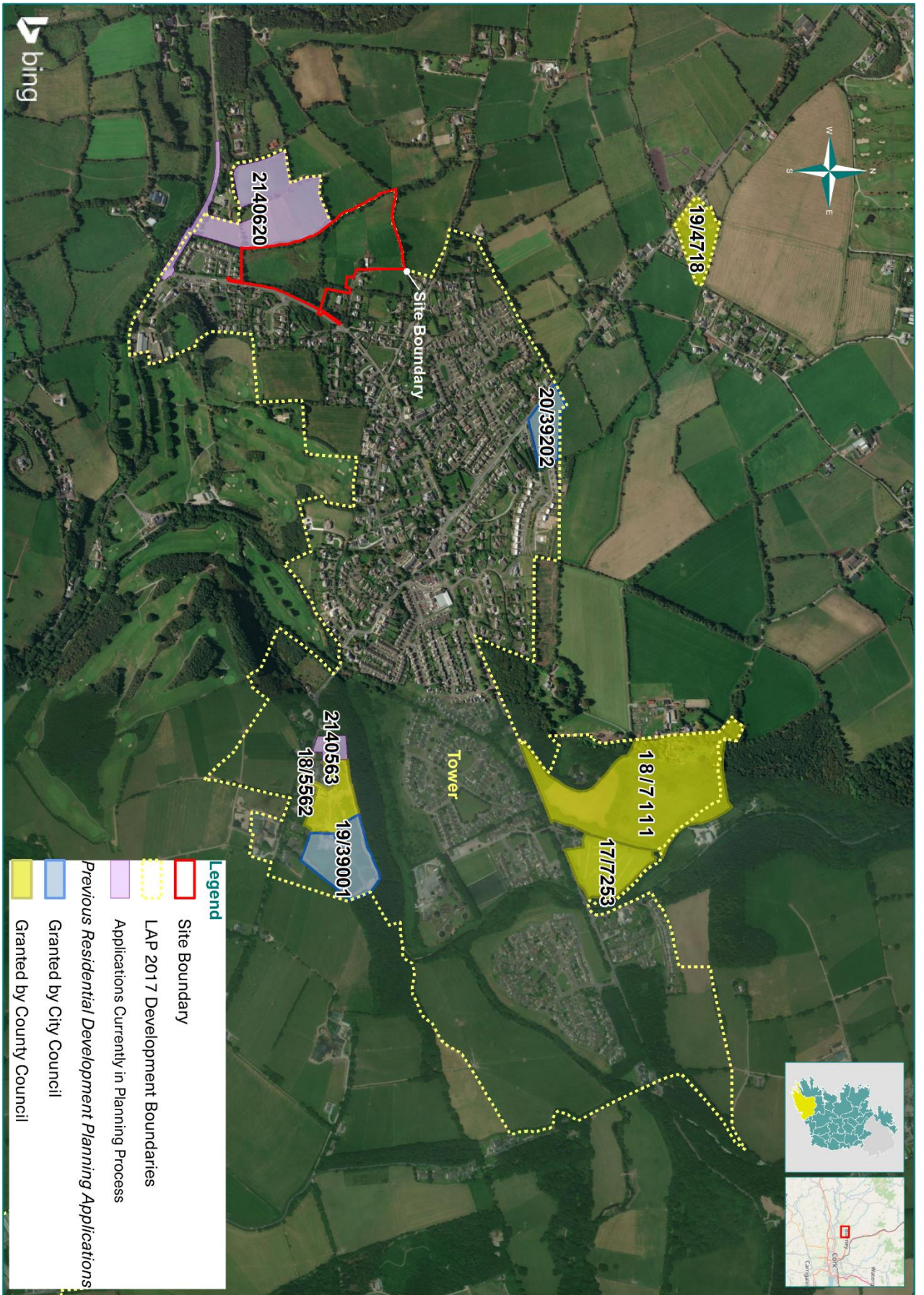


Figure 3.5 Planning Activity Map

We note, that at the time of the 2016 Census there were 1,134 no. households in the settlement of Tower. Given the scale of permitted and proposed developments outlined in table 01 and a number of other small scale residential developments in the settlement during this time, it is considered that there are currently approximately 1,440-1,500 no. existing/permitted or proposed dwellings in Tower.

The proposed development of 198 no. units represents approximately 13% of this total, resulting that the scale of development is consistent with the SRDUA which recommends that generally no one proposal should increase the existing housing stock in a settlement by more than 10-15% within the lifetime of the development plan or local area plan.

3.2.3.1 Application of Section 37 (2)(b)(iv) Considerations to the Proposed Development

Point iv - permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

As referenced previously in this Material Contravention Statement, the proposed development is consistent with the scale and pattern of the existing settlement with multiple other residential developments in the settlement of a similar scale to the proposed. These include Willison Park (circa 160 no. units) and Gleann na Ri (circa 130 no. units), in addition to multiple other estates within the settlement of circa 80-90 units. The existence of these other developments in the settlement, demonstrates that the settlement has the capacity to accommodate residential development of this scale and is reflective of the existing pattern of development.

As evidenced in this statement and the accompanying '*Planning Statement, Statement of Consistency and Response to ABP Opinion Report*', several other residential developments in excess of the 40 unit recommended threshold in the LAP have been permitted since the adoption of the current County Development Plan/Local Area Plan. Many of these residential units have been constructed and have integrated positively into the wider settlement.

3.2.3.2 Conclusion on Scale of Development

It is concluded that in the circumstances the Board may decide to grant permission for the proposed Cloghroe SHD, notwithstanding the material contravention of the provisions of the Development Plan/Local Area Plan relating to the scale of development.

Regarding the scale of development in Tower, we note Table 4.1 of the LAP 2017 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."

As demonstrated in the Architectural Design Statement prepared by Deady Gahan Architects and Planning Statement prepared by HW Planning the proposed development represents an infill mixed-use development which will contribute to a more compact settlement and promote walking, cycling and public transport. The scale of the proposed scheme is comparable with other residential developments in Tower and will continue the recent trends of strong residential growth in Tower. It is considered that notwithstanding the material contravention issue that the proposed development represents the appropriate and sustainable evolution of the settlement.

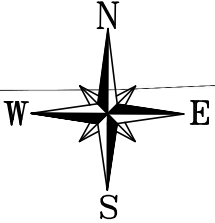
04. Conclusion

On the basis of the reasons and considerations set out in the report above, sufficient justification exists for An Bord Pleanála to decide to grant permission for the proposed Cloghroe SHD, in accordance with section 37(2)(b)(iii) and (iv) of the 2000 Act, notwithstanding the fact that the proposed SHD materially contravenes density standards for settlements identified in the County Development Plan 2014, car parking standards identified in in Table 1a, of Appendix D of the County Development Plan 2014 and 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.

Appendix A

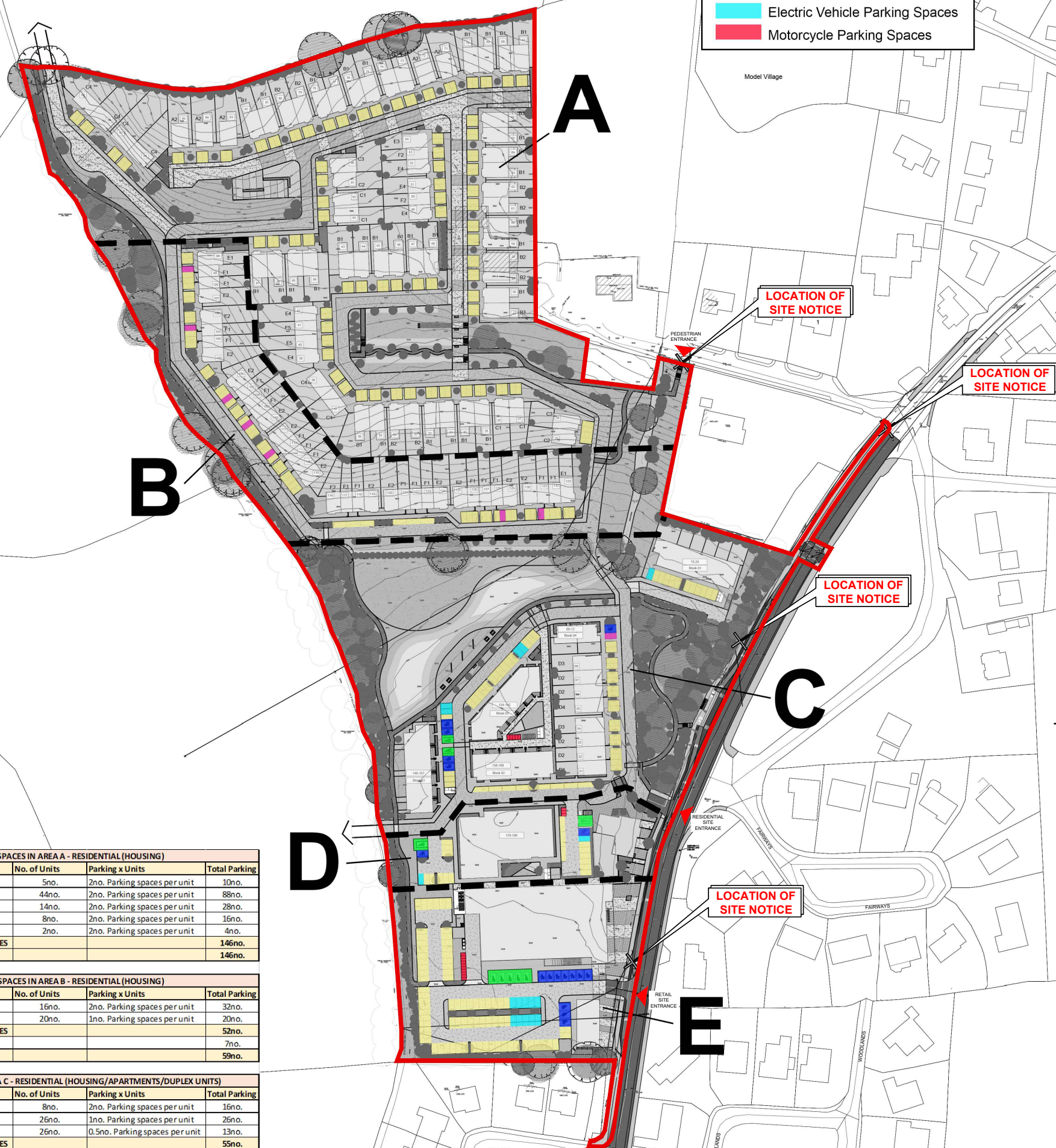
Parking Provision & Allocation

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

215 No. Bus Route Timetable

MONDAY TO FRIDAY

Cloghroe	<i>(Coolflugh Terminus)</i>			06:45	07:15	07:45	08:15	08:45	09:15	09:45	10:15	10:45	11:15	11:45	12:15	12:45	13:15	13:45	14:15	14:45
Blarney Village	<i>(Church)</i>			06:53	07:23	07:53	08:23	08:53	09:23	09:53	10:23	10:53	11:23	11:53	12:23	12:53	13:23	13:53	14:23	14:53
Watercourse Rd	<i>(Opp Blackpool Church)</i>			07:11	07:41	08:11	08:41	09:11	09:41	10:11	10:41	11:11	11:41	12:11	12:41	13:11	13:41	14:11	14:41	15:11
Grand Parade	<i>(Daybreak)</i>	06:30	07:00	07:30	08:00	08:30	09:00	09:30	10:00	10:30	11:00	11:30	12:00	12:30	13:00	13:30	14:00	14:30	15:00	15:30
Ballinlough Rd	<i>(Community Centre)</i>	06:42	07:12	07:42	08:12	08:42	09:12	09:42	10:12	10:42	11:12	11:42	12:12	12:42	13:12	13:42	14:12	14:42	15:12	15:44
Churchyard Lane	<i>(Silverdale)</i>	06:46	07:16	07:46	08:16	08:46	09:16	09:46	10:16	10:46	11:16	11:46	12:16	12:46	13:16	13:46	14:16	14:46	15:16	15:52
Mahon Point Rd	<i>(Mahon Point Centre)</i>	06:58	07:28	07:58	08:28	08:58	09:28	09:58	10:28	10:58	11:28	11:58	12:28	12:58	13:28	13:58	14:28	14:58	15:28	16:13
Mahon Point	<i>(Johnson & Perrott Garage)</i>	07:05	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05	15:35	16:25

Cloghroe	<i>(Coolflugh Terminus)</i>	15:15	15:45	16:15	16:45	17:15	17:45	18:15	18:45	19:15	19:45	20:00	20:30	21:00	21:30	22:00	22:30	23:00	23:30	
Blarney Village	<i>(Church)</i>	15:23	15:53	16:23	16:53	17:23	17:53	18:23	18:53	19:23	19:53	20:08	20:38	21:08	21:38	22:08	22:38	23:08	23:38	
Watercourse Rd	<i>(Opp Blackpool Church)</i>	15:41	16:11	16:41	17:11	17:41	18:11	18:41	19:11	19:41	20:07	20:22	20:52	21:22	21:52	22:22	22:52	23:22	23:52	
Grand Parade	<i>(Daybreak)</i>	16:00	16:30	17:00	17:30	18:00	18:30	19:00	19:30	20:00	20:20	20:35	21:05	21:35	22:05	22:35	23:05	23:35	00:05	
Ballinlough Rd	<i>(Community Centre)</i>	16:14	16:44	17:14	17:44	18:12	18:42	19:12	19:42	20:12		20:44	21:14	21:44	22:14	22:44	23:14			
Churchyard Lane	<i>(Silverdale)</i>	16:22	16:52	17:22	17:52	18:16	18:46	19:16	19:46	20:16		20:48	21:18	21:48	22:18	22:48	23:18			
Mahon Point Rd	<i>(Mahon Point Centre)</i>	16:43	17:13	17:43	18:13	18:28	18:58	19:28	19:58	20:28		20:57	21:27	21:57	22:27	22:57	23:27			
Mahon Point	<i>(Johnson & Perrott Garage)</i>	16:55	17:25	17:55	18:25	18:35	19:05	19:35	20:05	20:35		21:05	21:35	22:05	22:35	23:05	23:35			

MONDAY TO FRIDAY

Mahon Point	<i>(Johnson & Perrott Garage)</i>			07:05	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05
Skehard Rd	<i>(Service Station)</i>			07:08	07:38	08:08	08:38	09:08	09:38	10:08	10:38	11:08	11:38	12:08	12:38	13:08	13:38	14:08	14:38	15:08
Churchyard Lane	<i>(Silver Key Bar)</i>			07:12	07:42	08:12	08:42	09:12	09:42	10:12	10:42	11:12	11:42	12:12	12:42	13:12	13:42	14:12	14:42	15:12
Ballinlough Rd	<i>(Opp Community Centre)</i>			07:16	07:46	08:16	08:46	09:16	09:46	10:16	10:46	11:16	11:46	12:16	12:46	13:16	13:46	14:16	14:46	15:16
Cork Bus Station	<i>(Parnell Place)</i>	06:35	07:05	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05	15:35
Watercourse Rd	<i>(Blackpool Church)</i>	06:42	07:12	07:42	08:12	08:42	09:12	09:42	10:12	10:42	11:12	11:42	12:12	12:42	13:12	13:42	14:12	14:42	15:12	15:42
Blarney Village	<i>(Woolen Mills)</i>	07:05	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05	15:35	16:05
Cloghroe	<i>(Fairways Terminus)</i>	07:14	07:44	08:14	08:44	09:14	09:44	10:14	10:44	11:14	11:44	12:14	12:44	13:14	13:44	14:14	14:44	15:14	15:44	16:14

Mahon Point	<i>(Johnson & Perrott Garage)</i>	15:35	16:05	16:35	17:05	17:35	18:05	18:35	19:05	19:35	20:05	20:35	21:05	21:35	22:05	22:35	23:05	23:35		
Skehard Rd	<i>(Service Station)</i>	15:38	16:08	16:38	17:08	17:38	18:08	18:38	19:08	19:38	20:08	20:38	21:08	21:38	22:08	22:38	23:08	23:38		
Churchyard Lane	<i>(Silver Key Bar)</i>	15:42	16:12	16:42	17:12	17:42	18:12	18:42	19:12	19:42	20:12	20:42	21:12	21:42	22:12	22:42	23:12	23:42		
Ballinlough Rd	<i>(Opp Community Centre)</i>	15:46	16:16	16:46	17:16	17:46	18:16	18:46	19:16	19:46	20:16	20:46	21:16	21:46	22:16	22:46	23:16	23:46		
Cork Bus Station	<i>(Parnell Place)</i>	16:05	16:35	17:05	17:35	18:05	18:35	19:05	19:30	20:00	20:30	21:00	21:30	22:00	22:30	23:00	23:30	00:00		
Watercourse Rd	<i>(Blackpool Church)</i>	16:12	16:42	17:12	17:42	18:12	18:42	19:12	19:36	20:06	20:36	21:06	21:36	22:06	22:36	23:06				
Blarney Village	<i>(Woolen Mills)</i>	16:35	17:05	17:35	18:05	18:35	19:05	19:35	19:50	20:20	20:50	21:20	21:50	22:20	22:50	23:20				
Cloghroe	<i>(Fairways Terminus)</i>	16:44	17:14	17:44	18:14	18:44	19:14	19:44	19:59	20:29	20:59	21:29	21:59	22:29	22:59	23:29				

SATURDAY

Cloghroe <i>(Coolflugh Terminus)</i>					07:30	08:00	08:30	09:00	09:30	10:00	10:30	11:00	11:30	11:45	12:15	12:45	13:15	13:45	14:15	14:45
Blarney Village <i>(Church)</i>					07:38	08:08	08:38	09:08	09:38	10:08	10:38	11:08	11:38	11:53	12:23	12:53	13:23	13:53	14:23	14:53
Watercourse Rd <i>(Opp Blackpool Church)</i>					07:52	08:22	08:52	09:22	09:52	10:22	10:52	11:22	11:52	12:11	12:41	13:11	13:41	14:11	14:41	15:11
Grand Parade <i>(Daybreak)</i>	06:35	07:05	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:30	13:00	13:30	14:00	14:30	15:00	15:30	
Ballinlough Rd <i>(Community Centre)</i>	06:44	07:14	07:44	08:14	08:44	09:14	09:44	10:14	10:44	11:14	11:44	12:14	12:42	13:12	13:42	14:12	14:42	15:12	15:42	
Churchyard Lane <i>(Silverdale)</i>	06:48	07:18	07:48	08:18	08:48	09:18	09:48	10:18	10:48	11:18	11:48	12:18	12:46	13:16	13:46	14:16	14:46	15:16	15:46	
Mahon Point Rd <i>(Mahon Point Centre)</i>	06:57	07:27	07:57	08:27	08:57	09:27	09:57	10:27	10:57	11:27	11:57	12:27	12:58	13:28	13:58	14:28	14:58	15:28	15:58	
Mahon Point <i>(Johnson & Perrott Garage)</i>	07:05	07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05	15:35	16:05	

Cloghroe <i>(Coolflugh Terminus)</i>	15:15	15:45	16:15	16:45	17:15	17:45	18:15	18:45	19:15	19:45	20:00	20:30	21:00	21:30	22:00	22:30	23:00	23:30	
Blarney Village <i>(Church)</i>	15:23	15:53	16:23	16:53	17:23	17:53	18:23	18:53	19:23	19:53	20:08	20:38	21:08	21:38	22:08	22:38	23:08	23:38	
Watercourse Rd <i>(Opp Blackpool Church)</i>	15:41	16:11	16:41	17:11	17:41	18:11	18:41	19:11	19:41	20:07	20:22	20:52	21:22	21:52	22:22	22:52	23:22	23:52	
Grand Parade <i>(Daybreak)</i>	16:00	16:30	17:00	17:30	18:00	18:30	19:00	19:30	20:00	20:20	20:35	21:05	21:35	22:05	22:35	23:05	23:35	00:05	
Ballinlough Rd <i>(Community Centre)</i>	16:12	16:42	17:12	17:42	18:12	18:42	19:12	19:42	20:12		20:44	21:14	21:44	22:14	22:44	23:14			
Churchyard Lane <i>(Silverdale)</i>	16:16	16:46	17:16	17:46	18:16	18:46	19:16	19:46	20:16		20:48	21:18	21:48	22:18	22:48	23:18			
Mahon Point Rd <i>(Mahon Point Centre)</i>	16:28	16:58	17:28	17:58	18:28	18:58	19:28	19:58	20:28		20:57	21:27	21:57	22:27	22:57	23:27			
Mahon Point <i>(Johnson & Perrott Garage)</i>	16:35	17:05	17:35	18:05	18:35	19:05	19:35	20:05	20:35		21:05	21:35	22:05	22:35	23:05	23:35			

SATURDAY

Mahon Point <i>(Johnson & Perrott Garage)</i>		07:35	08:05	08:35	09:05	09:35	10:05	10:35	11:05	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05		
Skehard Rd <i>(Service Station)</i>		07:38	08:08	08:38	09:08	09:38	10:08	10:38	11:08	11:38	12:08	12:38	13:08	13:38	14:08	14:38	15:08		
Churchyard Lane <i>(Silver Key Bar)</i>		07:42	08:12	08:42	09:12	09:42	10:12	10:42	11:12	11:42	12:12	12:42	13:12	13:42	14:12	14:42	15:12		
Ballinlough Rd <i>(Opp Community Centre)</i>		07:46	08:16	08:46	09:16	09:46	10:16	10:46	11:16	11:46	12:16	12:46	13:16	13:46	14:16	14:46	15:16		
Cork Bus Station <i>(Parnell Place)</i>	07:30	08:00	08:30	09:00	09:30	10:00	10:30	11:00	11:35	12:05	12:35	13:05	13:35	14:05	14:35	15:05	15:35		
Watercourse Rd <i>(Blackpool Church)</i>	07:36	08:06	08:36	09:06	09:36	10:06	10:36	11:06	11:42	12:12	12:42	13:12	13:42	14:12	14:42	15:12	15:42		
Blarney Village <i>(Woolen Mills)</i>	07:50	08:20	08:50	09:20	09:50	10:20	10:50	11:20	12:05	12:35	13:05	13:35	14:05	14:35	15:05	15:35	16:05		
Cloghroe <i>(Fairways Terminus)</i>	07:59	08:29	08:59	09:29	09:59	10:29	10:59	11:29	12:14	12:44	13:14	13:44	14:14	14:44	15:14	15:44	16:14		

Mahon Point <i>(Johnson & Perrott Garage)</i>	15:35	16:05	16:35	17:05	17:35	18:05	18:35	19:05	19:35	20:05	20:35	21:05	21:35	22:05	22:35	23:05	23:35		
Skehard Rd <i>(Service Station)</i>	15:38	16:08	16:38	17:08	17:38	18:08	18:38	19:08	19:38	20:08	20:38	21:08	21:38	22:08	22:38	23:08	23:38		
Churchyard Lane <i>(Silver Key Bar)</i>	15:42	16:12	16:42	17:12	17:42	18:12	18:42	19:12	19:42	20:12	20:42	21:12	21:42	22:12	22:42	23:12	23:42		
Ballinlough Rd <i>(Opp Community Centre)</i>	15:46	16:16	16:46	17:16	17:46	18:16	18:46	19:16	19:46	20:16	20:46	21:16	21:46	22:16	22:46	23:16	23:46		
Cork Bus Station <i>(Parnell Place)</i>	16:05	16:35	17:05	17:35	18:05	18:35	19:05	19:30	20:00	20:30	21:00	21:30	22:00	22:30	23:00	23:30	00:00		
Watercourse Rd <i>(Blackpool Church)</i>	16:12	16:42	17:12	17:42	18:12	18:42	19:12	19:36	20:06	20:36	21:06	21:36	22:06	22:36	23:06				
Blarney Village <i>(Woolen Mills)</i>	16:35	17:05	17:35	18:05	18:35	19:05	19:35	19:50	20:20	20:50	21:20	21:50	22:20	22:50	23:20				
Cloghroe <i>(Fairways Terminus)</i>	16:44	17:14	17:44	18:14	18:44	19:14	19:44	19:59	20:29	20:59	21:29	21:59	22:29	22:59	23:29				

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Cloghroe – Blarney – City Centre – Ballinlough – Mahon Point

SUNDAY

Cloghroe <i>(Coolflugh Terminus)</i>	08:30	09:30	10:30	11:30	12:30	13:15	13:45		14:45		15:45		16:45	17:30	18:30	19:30	20:30	21:30	22:30	23:30
Blarney Village <i>(Church)</i>	08:38	09:38	10:38	11:38	12:38	13:23	13:53		14:53		15:53		16:53	17:38	18:38	19:38	20:38	21:38	22:38	23:38
Watercourse Rd <i>(Opp Blackpool Church)</i>	08:52	09:52	10:52	11:52	12:52	13:45	14:15		15:15		16:15		17:15	17:52	18:52	19:52	20:52	21:52	22:52	23:52
Grand Parade <i>(Daybreak)</i>	09:05	10:05	11:05	12:05	13:05	14:05	14:35	15:05	15:35	16:05	16:35	17:05	17:35	18:05	19:05	20:05	21:05	22:05	23:05	00:05
Ballinlough Rd <i>(Community Centre)</i>	09:12	10:12	11:12	12:12	13:12	14:12	14:42	15:12	15:42	16:12	16:42	17:12	17:42	18:12	19:12	20:12	21:12	22:12	23:12	
Churchyard Lane <i>(Silverdale)</i>	09:18	10:18	11:18	12:18	13:18	14:18	14:48	15:18	15:48	16:18	16:48	17:18	17:48	18:18	19:18	20:18	21:18	22:18	23:18	
Mahon Point Rd <i>(Mahon Point Centre)</i>	09:27	10:27	11:27	12:27	13:27	14:27	14:57	15:27	15:57	16:27	16:57	17:27	17:57	18:27	19:27	20:27	21:27	22:27	23:27	
Mahon Point <i>(Johnson & Perrott Garage)</i>	09:35	10:35	11:35	12:35	13:35	14:35	15:05	15:35	16:05	16:35	17:05	17:35	18:05	18:35	19:35	20:35	21:35	22:35	23:35	

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Mahon Point – Ballinlough – City Centre – Blarney – Cloghroe

SUNDAY

Mahon Point <i>(Johnson & Perrott Garage)</i>			09:35	10:35	11:35	12:35	13:35	14:35	15:05	15:35	16:05	16:35	17:05	17:35	18:05	18:35	19:35	20:35	21:35	22:35	23:35
Skehard Rd <i>(Service Station)</i>			09:38	10:38	11:38	12:38	13:38	14:38	15:08	15:38	16:08	16:38	17:08	17:38	18:08	18:38	19:38	20:38	21:38	22:38	23:38
Churchyard Lane <i>(Silver Key Bar)</i>			09:42	10:42	11:42	12:42	13:42	14:42	15:12	15:42	16:12	16:42	17:12	17:42	18:12	18:42	19:42	20:42	21:42	22:42	23:42
Ballinlough Rd <i>(Opp Community Centre)</i>			09:46	10:46	11:46	12:46	13:46	14:46	15:16	15:46	16:16	16:46	17:16	17:46	18:16	18:46	19:46	20:46	21:46	22:46	23:46
South Mall <i>(VHI House-Stop A)</i>			09:56	10:56	11:56	12:56	13:56	14:56	15:26	15:56	16:26	16:56	17:26	17:56	18:26	18:56	19:56	20:56	21:56	22:56	23:56
Cork Bus Station <i>(Parnell Place)</i>	08:00	09:00	10:00	11:00	12:00	13:00	14:00	15:00		16:00		17:00		18:00		19:00	20:00	21:00	22:00	23:00	00:00
Watercourse Rd <i>(Blackpool Church)</i>	08:06	09:06	10:06	11:06	12:06	13:10	14:10	15:10		16:10		17:06		18:06		19:06	20:06	21:06	22:06	23:06	
Blarney Village <i>(Woolen Mills)</i>	08:20	09:20	10:20	11:20	12:20	13:30	14:30	15:30		16:30		17:20		18:20		19:20	20:20	21:20	22:20	23:20	
Cloghroe <i>(Fairways Terminus)</i>	08:29	09:29	10:29	11:29	12:29	13:39	14:39	15:39		16:39		17:29		18:29		19:29	20:29	21:29	22:29	23:29	

Appendix C

Email Correspondence with the NTA

From: [Deirdre Tobin | HW Planning](#)
To: [John O'Brien | HW Planning](#)
Subject: FW: 215 Cork Bus Capacity [query from planning consultancy]
Date: 14 January 2022 17:12:14

From: Giorgio De Luca <Giorgio.Deluca@nationaltransport.ie>
Sent: Friday 14 January 2022 16:51
To: Deirdre Tobin | HW Planning <dtobin@hwplanning.ie>
Cc: Jeremy Ryan <jeremy.ryan@nationaltransport.ie>; buslicensing Mailbox <buslicensing@nationaltransport.ie>; David Ryan <David.Ryan@nationaltransport.ie>
Subject: RE: 215 Cork Bus Capacity [query from planning consultancy]

Hi Deirdre,

Here is the information you need to calculate the bus capacity for route 215:

- Latest timetables, giving you the number of daily trips: <https://www.buseireann.ie/inner.php?id=406&form-view-timetables-from=&form-view-timetables-to=Waterford+HSE&form-view-timetables-route=215&form-view-timetables-submit=1>
- Capacity of a bus: normally buses operating route 215 have capacity for 76 seated passengers and 15 standing passengers.

To calculate spare capacity, consider route 215 is currently carrying approximately 13,000 passengers a week, but in 2019, before the pandemic, it was carrying approximately 23,000 passengers a week.

I hope this helps.

Kind Regards,

Giorgio

Giorgio De Luca
Contracts Engineer

Údarás Náisiúnta Iompair
National Transport Authority
Dún Scéine
Iveagh Court
Harcourt Lane
Dublin 2
Tel. +353 1 881 5518

From: buslicensing Mailbox <buslicensing@nationaltransport.ie>
Sent: Thursday 13 January 2022 11:15
To: Giorgio De Luca <Giorgio.Deluca@nationaltransport.ie>; David Ryan <David.Ryan@nationaltransport.ie>
Cc: Jeremy Ryan <jeremy.ryan@nationaltransport.ie>
Subject: FW: 215 Cork Bus Capacity [query from planning consultancy]

FYI

From: Byrne, Blathnaid (Galway) <Blathnaid.Byrne@sgs.com>
Sent: Thursday 13 January 2022 10:58 AM
To: buslicensing Mailbox <buslicensing@nationaltransport.ie>
Cc: Lyons, Laura (Galway) <Laura.Lyons@sgs.com>
Subject: 215 Cork Bus Capacity

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

I had a Deirdre Tobin from HW Planning on the line wanting to query about bus capacities, in particular for the 215 in Cork. She stated it's for applications her company need to do and they need to include information on bus capacities and spare capacities. When looking up information on it on the internet, the National Transport Authority came up. I am aware that this is a Bus Eireann bus, but due to the fact that the NTA came up for her, I thought it would be better to take the query.

Would it be possible for someone to contact her in relation to this? Ms. Tobin's email is dtobin@hwplanning.ie

Kind regards,

Blathnaid

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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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