

Response to Cork County Council Pre-Application Consultation Opinion

For Development at Gortnahomna More (townland),
Castlemartyr, Co. Cork

on behalf of Marshall Yards Development Company Ltd

November 2024



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

This report addresses the specific information requirements and issues raised by Cork County Council (CCC) in their pre-planning Large Scale Residential Development (LRD) Opinion issued on 24th September 2024 in relation to the proposed LRD at Gortnahaomna More, Castlemartyr, Co. Cork comprising the construction of 150 no. residential units, 1 no. creche and all ancillary site development works.

The opinion issued by the Council was subsequent to 1 no. Section 247 meeting which took place on 23rd May 2024 and a Section 32B meeting which took place on 28th August 2024.

Following the pre-planning meetings, the Council issued an Opinion in accordance with Section 32D of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that a number of items needed to be addressed in accordance with the requirements of Article 4(7) of the Planning and Development Regulations 2017. The specific information requested by CCC and our response to same, is outlined in Section 2 of this report.

2. Information to be submitted with the LRD Application

The specific information requested by CCC (***bold italics***) and our response to same, is as follows:

1. ***Core Strategy***

While the desire to provide additional dwellings by way of a density aligned with the Sustainable and Compact Settlement Guidelines for Planning Authorities 2024 is welcomed, the growth rate identified for Castlemartyr village is to accommodate 122 no. units over the life cycle of the current County Development Plan (2022-2028).

The proposal currently exceeds this figure by 28 no. units, (or by 23%). In addition, it would also mean the entirety of the growth allocation would be utilised by a single developer, and the Plan is less than 2.5 yrs into 6 yr period and potentially prejudice any significant regeneration of 'backland' or 'brownfield' sites in the village core.

Given the considerable capacity of existing residential lands within the settlement, and residential zoned lands (3.7hectares); and residential additional provision zoned lands (1.3hectares); and villages centre zoned lands (11hectares), the scale of the 'greenfield' development is considered to be contrary to the Core Strategy of the CDP, where "the allocation of growth targets seeks to ensure that the growth would be sustainable and in keeping with the scale of the settlement," and contrary to the vision "to develop a compact strong village core and to achieve a sustainable level of population growth, residential development and provision for employment and services commensurate with the scale of the village."

The scale of the current proposal for 150 dwelling units is considered premature pending the adoption of a new National Planning Framework and any upward revision to regional/ metropolitan area targets that may be consequently incorporated into the CDP by way of variation or Ministerial Direction. The applicant should reconsider a refined proposal of a reduced number of units over a reduced site area to align with the Core Strategy and growth allocations of this key village. This initial proposal (or phase) should avoid any infrastructural dependence on 'RAP' zoned lands.

Sections 3.6.1 and 3.6.2 of Volume 4 of the Cork County Development Plan 2022-2028 describes Castlemartyr as a large village and has identified Castlemartyr with targets to increase population up to 1,920 by 2028.

The site is served by very high-quality infrastructure and facilities, including a Wastewater Treatment Plant. Uisce Eireann have confirmed a project is currently underway which will provide the necessary upgrade and capacity which is scheduled to be completed in 2026 (refer to submitted Confirmation of Feasibility with the application).

The village of Castlemartyr also has a good range of services and community facilities including a convenience store, pharmacies, service stations, church, a primary school, post office and public houses. All of these facilities are within easy walking distance of the subject site. The village is also served by a public bus service to Cork City including the 260 Bus Route (Cork- Castlemartyr-Ardmore), the 40 Bus Route (Tralee - Cork - Castlemartyr -Waterford - Rosslare).

Sequentially the proposed development represents a logical extension to the village core. The sequential development of zoned lands is also strongly advocated in the Sustainable and Compact Settlements Guidelines for Planning Authorities (2024). Section 3.3.4 of the Guidelines state that the priorities for compact growth in small and medium sized towns are to:

- "a) strengthen town centres,*
- b) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
- c) realise opportunities for adaption, reuse and intensification of existing buildings and for backland, brownfield and infill development, and*
- d) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built-up footprint of the settlement.*
(emphasis added)

The proposed density of 37.5uph is also in line with the Sustainable and Compact Settlements Guidelines 2024 and presents a more sustainable use of the land.

With regard to the 2022 Cork Development Plan (CDP), objectives for Castlemartyr and specifically in relation to the CDP objective that the size of any individual residential scheme should not be over 50% of the overall scale of development for the settlement, it is proposed to deliver the scheme in two phases. These phases can and will be delivered over a period of 5 years, which would mean that the development would span two development plans.

As outlined in the Planning Report submitted with this application, the planning assessment highlights that there is a shortfall in the number of units being constructed in East Cork, due to infrastructural deficiencies in terms of both water supply and wastewater infrastructure within its villages. Considering the infrastructure constraints in many of these key villages in the area, it is inevitable that the East Cork Municipal District as a whole will fail to meet the current housing needs as outlined in the Core Strategy, unless there is a reallocation to key villages like Castlemartyr which has the capacity to cater for additional units.

The opinion states that the proposal exceeds the growth rate by 23%, however it must be reemphasised that the 50% guidance applies only in respect of allocation taken from a village (i.e. allocation cannot exceed

50% of that's village number) rather than what can be added to a village allocation.

The allocation of growth targets within the plan ensures that the growth is sustainable and in keeping with the scale of the settlement. The provision of 150 units will not only accommodate the growth of the future population but will also respect the character of the settlement and environment through the proposed scale, layout and design of the proposed development. The proposed units are designed with architectural features which respect the grain and architectural style of the area of Castlemartyr. A proposed use of simple render, slate and selected bricks will ensure the development respects the immediate character of the area.

Moreover, as outlined in Section 2.13.1 of the Core Strategy of the CDP, the overall scale of new development assigned to villages is not intended to provide a maximum limit on development, but instead acts as *"an indication of the number of additional dwellings which could reasonably be accommodated"* within a settlement, subject to other considerations such as suitably available infrastructure and services. It is considered reasonable that the provision of an additional 28 no. units as proposed in Castlemartyr can be accommodated, with a Confirmation of Feasibility and Statement of Design Acceptance from Uisce Éireann confirming feasibility. It should be noted that further to the Council's interpretation of the Development Plans policy with regard to the exceedance of the core strategy, which we maintain is not the intention of the CDP policy, a review of other settlements in the East Cork Municipal District was undertaken and it outlined in the Planning Report in further detail.

The Council have acknowledged their impending need to update its Core Strategy following the publication of updated population projections and housing supply requirements in the revised National Planning Framework (NPF) draft in July 2024. At the time of writing and submitting the LRD application, the NPF which was due to be published in October 2024, has not yet been made available. However, the draft NPF states that national housing targets will need to rise to 50,000 homes per annum to meet current population projections and existing pent-up demand. The 50,000 figure has been arrived at following the publication of the ERSI Report on population projections and housing supply needs, and it is an increase of approximately 50% of the 33,000 annual housing supply figure as outlined in 'Housing For All'.

Given the acknowledgement that significantly revised updates to Local Authority Core Strategies will be required in order to meet these revised targets, it is considered vital that settlements which can accommodate additional residential growth, in a sequential and sustainable manner, such as that proposal for Castlemartyr should take place. The development will strengthen the core of Castlemartyr and will provide sequential housing development that already has the necessary services

and supporting infrastructure to accommodate the additional growth for Castlemartyr.

The proposed development does not depend on the infrastructure servicing the 'RAP' zoned lands. It should be noted that the infrastructure (roads, surface water, wastewater, watermain) being delivered in the proposed phase of the LRD development includes capacity to serve the future development to the 'RAP' zoned lands and lands to the north within the Existing Residential lands and future development lands further to the south.

2. Appropriate Assessment/Ecology

The following is required:

1. A Natura Impact Statement to inform the competent authority during its Appropriate Assessment of the project and its potential to result in adverse effects to the integrity of the Ballymacoda Bay European Sites, alone or in-combination with other plans or projects.

A Natura Impact Statement (NIS) Report has been prepared by Doherty Environmental Ltd which forms part of this application, please refer to the report for further details. Doherty Environmental Consultants (DEC) Ltd., evaluated the potential impacts associated with the discharge of surface drainage water and it was found that in the absence of mitigation measures, there is a potential for contaminants to be released from the project site to the Kiltha River and Dower River which would contribute to water quality pressures. As part of this NIS, a range of mitigation measures have been outlined which aim to avoid the discharge of contaminated surface and ground drainage water from the site during both the construction and operational phases. Within the NIS report, it concludes that with the implementation of the mitigation measures that the potential for impact to occur will be eliminated and as such, adverse impacts to the Ballymacoda Bay European sites will not arise.

2. An Ecological Impact Assessment Report to address matters outlined in the AA Screening Report that do not fall under AA requirements.

An Ecological Impact Assessment (EclA) Report has been prepared by Doherty Environmental (DEC) Ltd which forms part of this application. A multidisciplinary of ecology surveys were undertaken by DEC Ltd during July, August and October 2024. Dedicated Bat Surveys were also completed on site.

Within the EclA report it acknowledges that the landscaping masterplan provides for the retention and enhancement of the existing hedgerows along the western and eastern boundary of the site. As noted within section 5.1.2 of the report, the project will result in c.51% loss of the existing willow scrub located to the north of the proposed housing. As outlined within the EclA, the willow scrub that now occupies the land to the north of the development is recent and has only become established in the last six to ten years after the site was stripped, aerial imagery has been provided within the ecology reports by DEC Ltd which shows the

absence of willow scrub in September 2011 and the emergence of willows in September 2014. In order to offset the loss of this willow scrub, a proposed native woodland habitat will be provided which will overlap the footprint of the existing willow scrub. The woodland will also be extended south, and the species mix will consist of native trees comprising of hazel, crab apple, rowan, oak, birch and Scots pine. The southern area of the woodland has been identified as an ecological corridor in the proposed Landscaping Masterplan and will consist of wetland habitats provided as part of the SuDs drainage features. As outlined within the EclA, the proposed woodland will result in a net increase in the extent of such habitats within the site.

As outlined in the submitted EclA, there will be no residual loss of habitat of conservation value and the proposed landscaping design and provision of woodland planting will result in an increase in the extent of woodland habitat on site and improve the quality of woodland habitat through an increase in floral biodiversity. Refer to the submitted EclA for further details.

3. Submitting a revised Landscaping Plan that:

- a. provides native alternatives to the following species: *Acer campestre*. No non-native plants should be planted along boundaries of the site. Native species list in Appendix**

The proposed landscaping details by Bernard Seymour Landscape Architects (BSLA) have been updated and *Acer campestre* has been removed from the species list. All non-native species have been removed from the boundary treatment. The landscaping details proposes *Quercus Robor* planting, refer to the 'Northern Boundary Treatment' within the landscaping plan for further details.

- b. Provides for the planting of flowering plants that are listed in the All-Ireland Pollinator Plan**

Flowering plants referenced in the All-Ireland pollinator plan are outlined in the 'planting strategy' within the submitted Landscaping Report by BSLA.

- c. Provides for the management of grassland to allow for the growth of wildflowers, that would naturally occur within the site and its surrounding environs.**

The meadow planting proposed within the site are areas of naturalized grassland using topsoil salvaged from the site which will enable the native residual seed stock to gradually re-emerge. At the installation stage, the salvaged soil will be seeded with native red/white clover which will enable quick soil stabilization and provide immediate pollinator benefits, while allowing future growth of the native seed stock, which often takes several seasons to re-emerge. No other wildflower seed will be introduced.

- d. Provides details and species list of plants to be planting along herbaceous borders and swales.**

Refer to the submitted Landscaping Report by Bernard Seymour Landscape Architects (BSLA) submitted with this application.

3. Design and Layout

Design and layout is generally agreeable but consideration be given to the following:

- 1. Redesign the form, scale and massing of the proposed Creche building to create an appropriate local landmark/ feature building, to aid legibility and placemaking, as opposed to reflecting a residential form.**

The proposed details of the creche facility has been revised to provide a building which acts as a nodal point when arriving into the development. The proposed materiality of the creche has been revised to create a more appropriate feature building and helps distinguish the building from the housing within the scheme. The childcare facility proposes multi-coloured panels which also enhances the identity of the proposed creche building and will create a legible setting and focal point.

- 2. Dwellings should have a more positive engagement and face onto the adjoining green area, including dwellings no. 73, 130 and 131.**

Dwellings No. 73, 130 and 131 have been revised within the site layout plan and are orientated to overlook the open spaces and will provide passive surveillance for adjacent green areas within the site. The proposed bungalows have also been revised in order to improve the interaction with the communal plaza. The internal layouts have been revised to ensure they overlook both the communal plaza to the front of the units and the private amenity space to the south. A bench seat has also been incorporated to the front elevation to encourage interaction with the community of the future occupants.

- 3. Position of house no. 72 provides for poor residential amenity and lack of privacy as rear of house is conspicuous from adjoining inner estate roadway and should be re-positioned/ reorientated.**

The proposed site layout plan has been amended to provide additional dual fronted units. House no. 72 has been repositioned in order to provide a more secure and private amenity space to the south of the unit.

- 4. The 'no-mans-land' to side of dwelling no. 12 should be incorporated into side / rear garden of dwelling.**

The private amenity space to dwelling no. 12 has been reconfigured to ensure the omission of the 'no mans land' and help provide a higher quality and help maintain high quality private amenity spaces for the future residents.

- 5. Location of ESB Kiosk – located in open green area – opposite dwelling no. 69. Should be relocate to improve visual amenity.**

The relocation of the ESB substation located to the western part of the development has been considered by the design team. A number of different locations within the proposed development were considered such as the proposed open space, however due to restrictions of the ESB substation requiring direct access and setback distance requirements from buildings, it was determined that the final retained location was considered to be the most optimum in terms of visual amenity and sympathetic integration.

6. Overall design and Infrastructure

Submit more detailed proposals for adjoining lands within blue boundaries / legal interest (in particular lands to the north of site to clarify development intentions and to understand and assess configuration of scheme and relationship to these potential future development sites). An overall masterplan approach would be useful, particularly in respect of the Northern part of the site as this forms the main interaction with the street/ Road. (This relates to Engineering point below).

A potential masterplan proposal plan (Drawing No. P016) has been provided by Deady Gahan Architects. The details of the potential masterplan have also been outlined within Section 3 of the Design Statement by Deady Gahan Architects. The 'Existing Residential' zoned lands located to the north of the proposed development would be accessed via the proposed entrance and internal primary street. The proposed childcare facility is being delivered as part of this application and forms part of the 'Existing Residential' zoned lands. A pedestrian and cycle route is provided in front of the proposed creche which also provides a secondary access to the site along the N25.

The layout of the lands to the north within the 'Existing Residential' zoned lands and the lands to the south of the site within the 'RAP' zoned lands are guided by the proposed internal local streets.

The layout of the proposed development has been carefully considered to ensure that pedestrian and vehicular linkages can be provided to the future lands and a good relationship between the future development is provided. The potential future development would consist of a unit typology and density in line with the proposed scheme to provide a strong link between the developments.

As shown within the documents submitted with this application, the proposed native woodland area/willow area will be delivered with this application and will be associated with the future development of the lands.

7. Engineering

Attenuation tanks should be constructed in reinforced concrete, with provision for access for internal inspection and repair (having regard to the Karst geology of the area).

Refer to the submitted proposed Surface Water Drainage Layout Drawing (C-200) and Typical SuDS Detail Attenuation Tank Plan (C-265) by DOBA &

Associates Engineering which have been updated to include reinforced concrete attention tanks having regard to the potential karst geology of the area.

Installing a watermain on the N25 to serve the site is highly undesirable and a road opening license may not be granted for this proposal (having regard to the volume of traffic on this section of the N25 and the fact that the road was totally reconstructed recently). Note that CCC installed a 150mm watermain as part of the major roadworks project which should be adequate to serve the proposed development. If this is not adequate, then alternative routes would need to be considered that would minimise the impact to the N25. This aspect of proposal needs to be reviewed and verified and the overall level of development needs clarity around infrastructure; and as such this infrastructural detail does not constitute a reasonable basis on which to make an application.

A revised Confirmation of Feasibility (COF) has been issued by Uisce Eireann (Refer to Appendix A of the Infrastructure Design Report) and a Statement of Design Acceptance (SoDA) has also been issued for a connection to the 150mm watermain constructed as part of the major roadworks project along the N25. The SoDA is provided within Appendix B of the Infrastructure Design Report by DOBA & Associates Engineering.

8. Servicing

Please ensure a Feasibility of Connection (FoC) agreement with Irish Water is included with any application consenting to the accommodation of the treated hydraulic load to the public system.

A Confirmation of Feasibility (COF) has been issued by Uisce Eireann (Refer to Appendix A of the Infrastructure Design Report) which confirms that upgrade works are underway to increase the capacity of the Castlemartyr Wastewater Treatment Plant and is scheduled to be completed in 2026 (which may be subject to change).

9. Archaeology

The identified sub-surface archaeology appears to be located outside the red line boundary for the current development proposal, although in the ownership of the applicant. Although a geophysical survey and testing was carried out, the applicant should be aware that the potential for discovering further pre-historic features on the site is somewhat increased. The testing provided a 'snapshot' through the development site, but it is noted that the trenches were very spread out, some measuring 30m apart. This further sub-surface potential should be addressed in the forthcoming assessment with mitigation measures. It should be borne in mind that Cork County Council has a preference for preservation in situ of any identified archaeology and this is in accordance with Objective HE16-13. This should also be reflected in the assessment report. Potential additional testing to fill in the gaps (in areas not tested previously) should be considered by the

appointed archaeologist to rule out the presence of additional sub-surface archaeology within the red line boundary area. The appointed archaeologist is advised to liaise with this office regarding the findings of the assessment and any further mitigation measures at this stage.

To confirm, the identified sub-surface archaeology is located outside the red line boundary for the current development proposal and will not be impacted by the development proposal. During the design process, John Cronin & Associates have liaised with the archaeologist who undertook the original programme of investigation, Daniel Noonan Archaeological Consultancy (DNAC). We wish to confirm that the geophysical survey undertaken by Target Geophysics was comprehensive as was the testing carried out by DNAC, a suitably qualified and experienced archaeologist. Both John Cronin & Associates and DNAC consider that the geophysical survey work undertaken by Target Geophysics to be of the highest quality and accuracy. When combined with the targeted testing undertaken by DNAC, the risk for significant archaeological features within the subject site can be considered to be low.

The applicant and archaeologist from John Cronin & Associates, do not accept that there is a strong basis for a further programme of archaeological testing as the site subject has been adequately and comprehensive investigated to date. Nonetheless, the applicant is fully prepared to engage the services of a suitably qualified archaeologist to monitor topsoil removal associated with the proposed development. In line with the recommendations of the County Archaeologist in March 2018, the applicant would ensure that the archaeologist would act under licence from the National Monuments Service of the Department of Housing, Local Government and Heritage (DHLGH) and that in the event of archaeological discovery that the archaeologist would liaise with both NMS and Cork County Council's County Archaeologist. The applicant invites the Council to apply a condition requiring licenced archaeological monitoring of site development works.

10. Public Lighting

Submit public lighting design details compliant with the Cork County Council Public Lighting Manual and Product Specification 2023

A public lighting report and associated public lighting drawings have been prepared by ENX Engineering Consultants which complies with the Cork County Council Public Lighting Manual and Product Specification 2023.

The following reports/ assessments should be prepared as part of application.

- **EIA Screening Report**

An Environmental Impact Assessment (EIA) Screening Report has been prepared by McCutcheon Halley Planning Consultants and submitted as part of this LRD Application.

- **Site specific Construction, Environmental and Waste Management Plan; and Operational Waste Management Plan to align with inter alia ecological, landscape, archaeological and surface water/ flood issues.**

A site-specific Construction Management Plan and Operational Waste Management Plan have been prepared by Donnacha O'Brien and Associates Consulting Engineers (DOBA) which align with the ecological, landscaping, archaeological and surface water details as part of this application. Refer to submitted documents for further details.

- **Details of Surface Water Management and a Drainage Impact Assessment (Surface Water). The design and management of surface water for the proposed development will comply with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) and the Cork County Development Plan 2022 – 2028. The design of the surface water network and SuDS measures within the application site shall include a 20% climate change factor in accordance and the Cork Co. Co. Water Services requirements. The proposed SuDS measures will incorporate Nature Based SuDS, filtration systems, detention system SuDS and proprietary treatment systems such as petrol/oil separators and rainwater harvesting to the creche).**

A Drainage Impact Assessment (DIA) Report has been prepared by Donnacha O'Brien and Associates Consulting Engineers (DOBA) in accordance with the requirements of the Greater Dublin Strategic Drainage Study (GDSDS), and the Cork County Development Plan 2022. The DIA confirms that the design of the surface water network includes a 20% climate change factor, and the proposed SuDS measures include Nature Based SuDS filtration systems including tree pits, dry swales, permeable paving and also proprietary treatment systems such as petrol interceptor and rainwater harvesting for the proposed childcare facility.

- **A Final Version of the TTA & MMP**

A final Traffic and Transport Assessment (including a Mobility Management Plan) has been submitted and prepared by Traffic Insight as part of this application.

- **DMURS Statement of Compliance**

Refer to Section 7.4 of the Infrastructure Design Report by Donnachadh O'Brien and Associates Consulting Engineers which outlines the proposed infrastructure to serve the development is in accordance with the Design Manual for Urban Roads and Streets (DMURS). This information is also illustrated in the Engineering Proposed Site Layout Plan Drawing No. 500.

- **Design Rationale and necessary Road Safety Assessment/ Audit of proposed junction at site entrance with N25.**

A Stage 1 Road Safety Audit of the proposed junction at the site entrance has been completed by Traffico and is submitted with this application. The

signed audit feedback form is included within Appendix G of the Infrastructure Design report by DOBA.

3. Copy of Cork County Council Opinion



Comhairle Contae Chorcaí

Cork County Council

24/09/24

Pre-planning LRD Opinion under S.32D of the Planning & Development Act.

Re: LRD at Gortnaheomna More, Castlemartyr by Marshall Yards Development Company Ltd.

Section 247 Meeting held on 23rd May 2024 via MSTeams, (minutes attached).

Section 32B Meeting held on 28th August 2024 via MSTeams, (minutes attached).

In accordance with the legislation the Planning Authority is required to provide an opinion to the prospective applicant as to whether or not the documents submitted for the purpose of the meeting constitute a reasonable basis on which to make an application.

Article 4(7) of the Regulations states that when issuing an opinion, in addition to the requirements of

Submitted Documents

The documents submitted with the S32 meeting request include the following:

- Cover Letter and Schedule of Documents and Drawings prepared by McCutcheon Halley Planning Consultants
- Section 32B LRD Pre-application Form
- Letter of Consent from Glenveagh
- Letter of Consent from Cork County Council
- Letter of Consent from Stephen Egan
- Planning Report
- Statement of Consistency
- School Demand Report
- Childcare Demand Report all prepared by McCutcheon Halley Planning Consultants
- Archaeological Impact Assessment by John Cronin & Ass
- Flood Risk Assessment by JBA Consulting
- Public Lighting Scheme by ENX Engineering
- Appropriate Assessment Screening report by Doherty Env.
- Infrastructure Design by DOBA Engineering
- CGIs and Photomontages by Dimension 88
- Architectural drawings, including layout and design details,
- Part V Proposals
- Architectural Design Statement
- Housing Quality Assessment
- Universal Design Statement, all by Deady Gahan
- Arboricultural Technical Note, Tree & Hedgerow Protection Plan, Tree Survey Plan and Works Plan prepared by Charles McCorkell

- Traffic and Transport Assessment, Mobility Management Plan prepared by Transport Insight

Assessment

The submitted documents have been assessed and reviewed against the key themes outlined below, and the requirements of Section 32D of the Planning and Development Act 2000 (as amended).

Policy Context – Cork County Development Plan 2022

The subject site is located within the designated settlement boundary for the Key Village of Castlemartyr. The target population is 1,920 persons by 2028 with a housing requirement for 122 units. The site is zoned 'Existing Residential/Mixed Residential and Other Uses', 'Residential' and 'Residential Additional Provision' as per the Cork County Development Plan 2022.

Site location and details

The 4.0 hectare site is located within the townland of Gortnahomna More, east of Castlemartyr's village centre, and is approximately 1.2km east of Castlemartyr Resort. The northern boundary of the site fronts onto the N25 which is the main street and part of the main Cork to Waterford Road. The area surrounding the site is characterised by a mix of uses comprising mostly of residential and agricultural use with the lands to north, west and southwest having all been developed for residential use.

The site comprises two fields of improved grassland in the southern section, with the roadside (north) plot comprised of a cleared area in the west and northwest and willow woodland taking up most of the rest of the northern plot. Each plot is separated by hedgerow.

Proposed Development

The proposed development consists of 150 no. residential units and a 68 no. child place creche facility, 1 no. ESB substation and all associated site development works. The residential mix proposed is described as follows: 60no. x 2-bedroom units; 82no. x 3-bedroom units; 8no. x 4-bedroom units. The site will be accessed from the north via a new entrance point and priority junction along N25 Killeagh Road

Relevant Planning History

2017 - Solas Partnership lodged a planning application for 209-unit residential development and a creche facility (508m²) with 2 no. first floor office units (152m²), 2 pedestrian links into the existing Gortnahomna More residential estate, main entrance pillars, wing walls, a kick about pitch, multi-use games area, 4 no. local play areas, open space areas, site landscaping.

The planning authority refused the application on the basis that there were deficiencies in the capacity of the wastewater treatment facilities and public water supply in Castlemartyr. Following this, a first party appeal was submitted to An Bord Pleanála by the applicant. ABP ultimately upheld the decision of the PA

Land-Use Zoning

Castlemartyr is a "key Village" under the settlement hierarchy identified under the County Development Plan. Development Objective CB-DM-01 states that within the development boundary of Castlemartyr encourage the development of up to **122 houses** during the plan period.

The subject site/land holding is subject to three separate zoning provisions that are applicable under the current Plan, namely, Existing Residential/Mixed Residential and Other Uses; Residential (R); and Residential Additional Provision (RAP).

Determination

Planning and Development (Large-Scale Residential Development) Act (2021)

Notice of s.32 Pre-Application Consultation Opinion

Having considered the issues raised in the pre-application consultation process, the subsequent consultation meetings and following review of the documentation submitted, in accordance with Section 32D of the Planning & Development (Large-scale Residential Development) Act (2021) the Planning Authority is of the opinion that the documents submitted require further consideration and amendment to constitute a reasonable basis for an application for a Large-Scale Residential Development.

The Planning Authority considers that the following issues need to be addressed in the documents submitted, to result in them constituting a reasonable basis on which to make an application for a Large-Scale Residential development:

In accordance with Section 32D of the Planning & Development (Large-scale Residential Development) Act 2021 it is considered that the following issues need to be addressed in the documents submitted in order to result in them constituting a reasonable basis for an application.

Core Strategy

While the desire to provide additional dwellings by way of a density aligned with the Sustainable and Compact Settlement Guidelines for Planning Authorities 2024 is welcomed, the growth rate identified for Castlemartyr village is to accommodate 122no. units over the life cycle of the current County Development Plan (2022-2028).

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Given the considerable capacity of existing residential lands within the settlement, and residential zoned lands (3.7hectares); and residential additional provision zoned lands (1.3hectares); and villages centre zoned lands (11hectares), the scale of the 'greenfield' development is considered to be contrary to the Core Strategy of the CDP, where "the allocation of growth targets seeks to ensure that the growth would be sustainable and in keeping with the scale of the settlement," and contrary to the vision "to develop a compact strong village core and to achieve a sustainable level of population growth, residential development and provision for employment and services commensurate with the scale of the village."

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Appropriate Assessment/ Ecology

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2. An Ecological Impact Assessment Report to address matters outlined in the AA Screening Report that do not fall under AA requirements.
3. Submitting a revised Landscaping Plan that:
 - a. provides native alternatives to the following species: *Acer campestre*. No non-native plants should be planted along boundaries of the site. Native species list in Appendix
 - b. Provides for the planting of flowering plants that are listed in the All-Ireland Pollinator Plan
 - c. Provides for the management of grassland to allow for the growth of wildflowers, that would naturally occur within the site and its surrounding environs.
 - d. Provides details and species list of plants to be planting along herbaceous borders and swales.

Design & layout

Design and layout is generally agreeable but consideration be given to the following:

1. Redesign the form, scale and massing of the proposed Creche building to create an appropriate local landmark/ feature building, to aid legibility and placemaking, as opposed to reflecting a residential form.
2. Dwellings should have a more positive engagement and face onto the adjoining green area, including dwellings no. 73, 130 and 131.
3. Position of house no. 72 provides for poor residential amenity and lack of privacy as rear of house is conspicuous from adjoining inner estate roadway and should be re-positioned/ re-orientated.
4. The 'no-mans-land' to side of dwelling no. 12 should be incorporated into side / rear garden of dwelling.
5. Location of ESB Kiosk – located in open green area – opposite dwelling no. 69. Should be re-locate to improve visual amenity.

Overall design and Infrastructure

Submit more detailed proposals for adjoining lands within blue boundaries / legal interest (in particular lands to the north of site to clarify development intentions and to understand and assess configuration of scheme and relationship to these potential future development sites). An overall masterplan approach would be useful, particularly in respect of the Northern part of the site as this forms the main interaction with the street/ Road. (This relates to Engineering point below).

Engineering

Attenuation tanks should be constructed in reinforced concrete, with provision for access for internal inspection and repair (having regard to the Karst geology of the area).

Installing a watermain on the N25 to serve the site is highly undesirable and a road opening license may not be granted for this proposal (having regard to the volume of traffic on this section of the N25 and the fact that the road was totally reconstructed recently). Note that CCC installed a 150mm watermain as part of the major roadworks project which should be adequate to serve the proposed development. If this is not adequate, then alternative routes would need to be considered that would minimise the impact to the N25. This aspect of proposal needs to be reviewed and verified and the overall level of development needs clarity around infrastructure; and as such this infrastructural detail does not constitute a reasonable basis on which to make an application.

Servicing

Please ensure a Feasibility of Connection (FoC) agreement with Irish Water is included with any application consenting to the accommodation of the treated hydraulic load to the public system.

Archaeology

The identified sub-surface archaeology appears to be located outside the red line boundary for the current development proposal, although in the ownership of the applicant. Although a geophysical survey and testing was carried out, the applicant should be aware that the potential for discovering further pre-historic features on the site is somewhat increased. The testing provided a 'snapshot' through the development site, but it is noted that the trenches were very spread out, some measuring 30m apart. This further sub-surface potential should be addressed in the forthcoming assessment with mitigation measures. It should be borne in mind that Cork County Council has a preference for preservation in situ of any identified archaeology and this is in accordance with Objective HE16-13. This should also be reflected in the assessment report. Potential additional testing to fill in the gaps (in areas not tested previously) should be considered by the appointed archaeologist to rule out the presence of additional sub-surface archaeology within the red line boundary area. The appointed archaeologist is advised to liaise with this office regarding the findings of the assessment and any further mitigation measures at this stage.

Public Lighting

Submit public lighting design details compliant with the Cork County Council Public Lighting Manual and Product Specification 2023

The following reports/ assessments should be prepared as part of application.

- **EIA Screening Report**
- Site specific **Construction, Environmental and Waste Management Plan**; and **Operational Waste Management Plan** to align with inter alia ecological, landscape, archaeological and surface water/ flood issues.
- Details of **Surface Water Management** and a **Drainage Impact Assessment** (Surface Water. The design and management of surface water for the proposed development will comply with the requirements of the Greater Dublin Strategic Drainage Study (GSDS) and the Cork County Development Plan 2022 – 2028. The design of the surface water network and SuDS measures within the application site shall include a 20% climate change factor in accordance and the Cork Co. Co. Water Services requirements. The proposed SuDS measures will incorporate Nature Based SuDS, filtration systems, detention system SuDS and proprietary treatment systems such as petrol/oil separators and rainwater harvesting to the creche), MHP Planning Report.
- **A Final Version of the TTA & MMP**
- **DMURS Statement of Compliance**
- **Design Rationale and necessary Road Safety Assessment/ Audit** of proposed junction at site entrance with N25.

Thomas Watt, Senior Planner

End.