

The Planning Department,  
County Hall,  
Carrigrohane Road,  
Cork

15 March 2024

**Re: Response to Further Information: Planning Ref No: 23/06277 - Permission for the following Large-Scale Residential Development (LRD) comprising of the construction of 272 no. residential units, 3 ESB Substations, 1 no. creche and community use building and all associated site development works including footpaths, car and bicycle parking, drainage, bicycle and bin stores, lighting and landscaping amenity areas. Site development works include road widening works along the eastern side of the L7630 and the provision of a new foot path along the eastern side of the L7630 Broomfield Road together with a new pedestrian crossing. Access to the site will be via 4 new vehicle access points from the existing L7630 Broomfield Road and a new pedestrian connection to Blossom Hill at Broomfield West, Midleton, Co. Cork.**

Dear Sir or Madam,

We act on behalf of applicant Castle Rock Homes (Midleton) Ltd., and wish to submit a response to the Council's request for further information dated on the 17<sup>th</sup> January 2023 under Council Ref No: 23/06277 in relation to an application for a large scale residential for the construction of 272 no. residential units, 3 ESB substations, 1 no. creche and community facility and all associated site development works.

The following are the plans and particulars that accompany this response:

- Architectural drawings, updated Parking Quality Assessment and Housing Quality Assessment prepared by BOK & Associates;
- Engineering Drawings by BOK & Associates;
- Landscaping plans and section plans, LVIA Analysis prepared by Forestbird Design ;
- Revised Ecological Impact Assessment prepared Malone O'Regan Environmental;
- Traffic and Transport Assessment – Addendum by Hegsons Design Consultancy Ltd;
- A Letter of Consent by Caraden Construction Ltd; and
- Updated photomontages prepared by GNet3D.

Six copies of this response letter and supporting documents/drawings have been submitted to the Council for consideration. In the interest of clarity, we will respond to the items in the same order the Council requested them.

## Item 1: Ecology

**(a) The level of tree and hedgerow loss on site is unacceptable especially given that no bat or badger surveys were carried out in respect of the proposed development site. You are requested to review the layout of the scheme with a view to retaining existing treeline and hedgerow. The revised layout shall be informed by the findings of the Bat and Badger survey. It is noted that some tree surgery is required where trees are identified to be dying or dead associated with Ash die back disease and Dutch Elm Disease.**

As part of the Ecological Impact Assessment (EclA) completed for this proposed development, it should be noted that a habitat survey of the site was undertaken on the 4<sup>th</sup> of April 2023 by two suitably qualified and experienced Ecologists from Malone O Regan Environmental (MOR). As part of this habitat survey, both a badger habitat suitability assessment and an assessment of the suitability of the habitats within and bordering the site to support bat roosting, foraging, and commuting was carried out on the 4<sup>th</sup> April 2023. As part of this assessment, the survey examined all trees/hedgelines onsite where badgers might occur. The badger habitat suitability assessment was conducted in line with the following relevant guidance for badgers:

- Scottish Badgers, 'Surveying for Badgers: Good Practice Guidelines,' (Scottish Badgers, 2018);
- The Mammal Society, 'Surveying Badgers,' (Harris, Cresswell, & Jefferies, 1989); and
- NRA, now TII, 'Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes,' (NRA).

During the habitat survey on the 4<sup>th</sup> April 2023, an assessment of the suitability of the habitats within and bordering the site to support bat roosting, foraging, and commuting was carried out in accordance with the NRA 'Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes'.

In spite of the submitted detailed assessments above within the LRD application and in response to this request for further information from Cork County Council, an updated site visit and assessment for both badgers and bat species was completed on the 7<sup>th</sup> February 2024 by a suitably qualified and experienced Ecologist from Malone O Regan Environmental. Prior to this survey and associated assessments, the layout of the scheme was reviewed in great detail, with a specific focus on areas of vegetation removal required as part of the proposed development. Following this, it was concluded that:

- No badger evidence i.e., no potential setts were recorded during the field survey and no direct evidence of badger activity in the form of feeding remains, snuffle holes, prints, scat or latrines was identified onsite; and
- No trees were identified that provided suitable roosting habitat for bats, however, the hedgerows / treelines which border the site provide suitable foraging habitat and connectivity to the wider landscape for commuting bats.

Please refer to the updated EclA by Malone O Regan Environmental for further details which has been submitted as part of this response to Cork County Council. It should also be noted that the removal of hedgerow which occurs along part of the western boundary is due the requirement of a 2m wide footpath which has been requested by Cork County Council.

It should also be noted that hedgerow and treeline loss required to facilitate the proposed development will be compensated by native tree planting associated with the proposed landscaping masterplan by

Forestbird Design which will result in a net gain of native tree specimens in general with a total of 807 no. semi mature and advanced trees will be planted including:

- 4 no. urban woodland treelines and clusters;
- 1,040 sqm of urban woodland understorey;
- 85 line.m of foraging corridor on the western boundary; and
- 600 sqm of biodiversity swales and 2,200 sqm of foundation shrubs.

The new planting will offer new and replacement green corridors that connect within the surrounding landscape. This will ensure landscape connectivity for bats and allow them to continue using the existing woodland for foraging and commuting purposes.

***(b) The EClA does not specify the amount of hedgerow loss associated with the development. The assessment of impacts associated with Hedgerows (WL2) and Treelines (WL1) simply states that 'Vegetation removal has been proposed as part of the Proposed Development'. However, no assessment of the loss of treelines and hedgerow has been made as part of the assessment. According to the Landscape Strategy for the development 660 lin. M. of hedgerow will be removed to facilitate the development. This is identified to be of low value from a landscaping perspective, however the overall value including the impact to bats, birds, badgers and other small mammals has not been assessed as part of the EClA.***

In order to facilitate the proposed development a total of ca.660m of hedgerow loss (which is of low ecological value) is associated with the revised scheme which will be compensated by native tree planting associated with the Landscape Masterplan that will result in a net gain of native tree specimens in general. Please refer to Table 5.1 (Valuation of Potential Ecological Receptors) within the updated EClA from Malone O'Regan Environmental which includes for the assessment of the loss of all treelines and hedgerows to facilitate the proposed development. The overall value including the impact to bats, birds, badgers and other small mammals has been assessed as part of the updated EClA. Based on the findings of the desk-based study, ecological information available for the site and surrounding area and the field surveys, that revised EClA concludes that:

- The site itself is currently considered to be of low ecological value;
- The site is not considered to be of high suitability or a site of importance for any Annex I or Annex II species or Red listed birds;
- The proposed development will not result in any significant impacts of ecological receptors identified both onsite and in the surrounding area following the implementation of appropriate mitigation measures; and
- The proposed Landscape Plan by Forestbird Design has been designed to compensate for any vegetation removed during site clearance works.

***(c) You are requested to update the EClA to include a detailed quantitative and qualitative assessment of the removal of trees, treelines and hedgerow on site having particular regard to the potential impacts to birds, bats, badgers and other small mammals. This shall also be informed by a bat and badger survey (see points below).***

Table 5.1 of the updated EClA from Malone O'Regan Environmental has been updated to include a detailed quantitative and qualitative assessment of the removal of trees, treelines and hedgerow on site

having particular regard to potential impacts to birds, bats, badgers and other small mammals. This information has been informed by the bat and badger survey undertaken on the 4<sup>th</sup> of April 2023 and 7<sup>th</sup> of February 2024. Please refer to the updated EclA for further details.

***(d) The proposed development site has the potential to support the bats and given the extensive site clearance proposed a dedicated bat survey is required. You are requested to submit a bat survey and submit the results of the same report. Details shall include:***

As outlined previously in this response letter, within the submitted Ecological Impact Assessment (EclA) for the LRD Application, a habitat survey of the site was undertaken on the 4<sup>th</sup> of April 2023 by two (2 No.) suitably qualified and experienced Ecologists from Malone O Regan Environmental. As part of this habitat survey, assessment of the suitability of the habitats within and bordering the site to support bat roosting, foraging, and commuting was carried out on the 4<sup>th</sup> April 2023 by two (2 No.) suitably qualified and experienced Ecologists from Malone O Regan Environmental. In spite of the detailed assessments outlined above and in response to this request for further information from Cork County Council, an additional bat suitability assessment was undertaken onsite on the 7<sup>th</sup> February 2024. The updated bat survey comprised of a ground level tree assessment. All trees present within the site boundary to be removed and retained were assessed for their potential to provide suitable roosting habitat for bats.

The proposed development will require vegetation removal including the removal of 16 no. dead trees and those effected by Dutch Elm disease fungus and Ash dieback. The removal of the hedgerow on the southwestern site boundary is associated with the removal of tree root balls to ensure diseased trees are completely removed from site.

The trees present within the hedgerows forming the current site boundary were low in height and were lacking in natural cavities or dense, woody ivy (*Hedera helix*). These features are essential requirements for bats roosting in trees and it can therefore be concluded that these trees are unsuitable for roosting bats. The trees bordering the Midleton Water Treatment Plant to the west of the site are not included within the site boundary but were included in the ground level tree assessment due to their proximity to the proposed site. These trees comprised of ash, wych elm and hawthorn with some woody ivy present. However, ivy growth was sparse on these trees and no natural cavities were recorded. It can be concluded that these trees are not suitable as bat roosts and therefore no bat roost will be disturbed during construction of the proposed development. All details of the updated bat suitability assessment are outlined in Section 4.2.2 of the revised EclA updated as part of the RFI response submission to Cork County Council.

***(e) It is advised that the survey would be completed in accordance with Bat Conservation Trust and NPWS Guidance – ‘Bat Surveys for the Professional Ecologists Good Practice Guidelines and Bat Mitigation Guidelines for Ireland – vol. 2).***

To clarify, all bat suitability assessment surveys were undertaken by qualified and experienced Ecologists from Malone O'Regan Environmental (MOR). The surveys completed in April 2023 and February 2024 were in accordance with Bat Conservation Trust and NPWS Guidance – ‘Bat Surveys for the Professional Ecologist Good Practice Guidelines (3rd edition)’ and ‘Bat Mitigation Guidelines for Ireland – vol 2’. All trees onsite were visually inspected from ground level for potential roost features (PRFs) using binoculars in line with the ‘Bat Mitigations Guidelines for Ireland -vol 2’ and ‘Bat Surveys for the Professional Ecologist Good

*Practice Guidelines (3rd edition)*). All details of the updated bat suitability assessment and results are outlined in Section 4.2.2 of the revised EclA submitted to Cork County Council.

**(f) Likely impacts of the development (during construction and ongoing) on bats identified to be using the site and significance of such impacts should be assessed and mitigation measures proposed where necessary.**

As part of this submission to Cork County Council, all likely impacts of the proposed development (both during construction and ongoing) to bats were identified and the significance of these impacts were assessed as part of Section 5.2 of the revised EclA. Within the EclA, it was concluded that there will be no significant impacts to bat species during construction and the operational phase of the development given the absence of suitable roosting habitats onsite. Nonetheless, mitigation measures are provided below, and in section 5.3 of the revised EclA, to reduce any potential impacts during the construction and the operational phase of the proposed development. Mitigation measures will include a pre-construction tree inspection and supervision of works by a suitably qualified and experienced Ecological Clerk of Works (ECoW).

As outlined in the EclA, the following mitigation measures are proposed where necessary. These measures include:

- Pre-Construction – A pre-construction tree inspection will be undertaken prior to the removal of any trees onsite. This pre-construction survey is due to the vagrant nature of bats and if any roosts are identified it may be necessary to carry out emergence / re-entry surveys on the site. In the unlikely event that bats are found to be roosting within trees after the updated surveys, further measures will be considered, and a derogation licence will be obtained if required. The findings of any required updated bat surveys will be submitted to the planning authority prior to the removal of vegetation. The findings of any required updated bat surveys will be submitted to the planning authority prior to the removal of vegetation;
- Monitoring – All clearance works will be supervised by a suitably qualified and experienced ECoW and will be carried out using hand tools only. The ECoW will visually inspect the trees following felling for the presence of bats. Should bats be found, the NPWS will be contacted;
- Lighting – A lighting plan has been developed to reduce any potential negative impacts to nocturnal animals such as bats. A lighting plan for the site has been developed by Eneveo and has been submitted with this LRD application to Cork County Council. This plan has been developed in line with Bat Conservation Trust (BCT) Guidelines *on 'Bats and Artificial Lighting in the UK'*. Following the installation of post construction lighting the ECoW will undertake a site inspection to check light patterns lux levels onsite; and
- Landscaping – Ecological enhancement measures will take place in the form of planting 4 no. urban woodland treelines and clusters, 1,040 sq.m. of urban woodland understory, 85 lin.m. of foraging corridor on the western boundary, 600 sq.m of biodiversity swales and 2,200 sq.m. of foundation shrubs. A total of 807 no. semi-mature and advanced trees will be planted as part of these ecological enhancement measures. The proposed planting will be achieved using 100% native species and regeneration of the existing natural seed bank with the exception of tree planting. 89% of trees planted onsite will be comprised of native species with the remaining 11% comprised of species acclimatised to difficult urban conditions. The new planting will offer new and replacement green corridors that will connect within the surrounding

landscape. This will ensure landscape connectivity for potential bats and allow them to continue using the existing woodland for foraging and commuting purposes.

All mitigation measure to reduce impacts to nocturnal species are provided in Section 5.3.2.2 of the revised EclA by Malone O' Regan Environmental.

***(g) Mitigation proposals should be fully integrated into the design of the proposed development. You are advised that where the proposed works involve damage to our interference with a bat roost site, that they will require a derogation license from the National Parks and Wildlife Service in order to be permitted to proceed.***

As outlined within the details originally submitted to Cork County Council, **no bat roosting sites** were identified as part of any surveys completed by Malone O' Regan Environmental Ecologists. It was also confirmed that no trees or features onsite were identified as having potential for roosting bats. As a result, there is no requirement for a derogation licence for this site.

As outlined within the EclA, a pre-construction survey will be required and an updated tree inspection will be carried out prior to the removal of trees and, if necessary, emergence / re-entry surveys will be carried out. In the unlikely event that bats are found to be roosting within trees after the updated surveys, the NPWS will be consulted for advice and a derogation licence will be obtained.

The removal of trees will be supervised by a suitably qualified ECoW and will be carried out using hand tools only. The ECoW will visually inspect the trees following felling for the presence of bats. Should bats be found, the NPWS will be contacted.

***(h) Please indicate whether any such license has been obtained or is in progress with their further information submission where relevant.***

As outlined above, based on the findings of the bat suitability assessment surveys undertaken on the site, it is considered that a derogation license from the National Parks and Wildlife Service will not be required. However, in the unlikely event that bats are found to be roosting within the trees after pre-construction surveys, the NPWS will be consulting for advice and a derogation licence will be sought.

***(i) Details of the tree PRF survey shall also be submitted.***

All details of the tree PRF survey are outlined within Section 4.2.2 – Table 4-4 of the revised EclA prepared by Malone O' Regan Environmental. This survey did not identify any suitable PRF features. Please also refer to the submitted responses to Item 1(d) and Item 1(e).

***(j) Given the extensive clearance across this site and known presence of Badgers within the general area, a dedicated Badger Survey shall be carried out. This survey shall be carried out within the optimal badger activity sett survey period (Oct – March) in line with Best Practice Guidelines. Full details of the survey results shall be submitted and shall inform revised design changes to the scheme as required.***

The proposed development is located within a greenfield site with limited existing hedgerows and/or trees. The site clearance as part of this scheme is considered to be of typical to low for a development of this scale. The description of 'extensive clearance' in the RFI is both inaccurate and misleading.

At the request of Cork County Council, an updated badger survey was carried out onsite on 7th February 2024. This survey identified and examined areas where badgers might be utilising the site and the surrounding lands. The survey was carried out within the optimal badger activity sett survey period

(between October to March) in line with Best Practice Guidelines. MOR would like to confirm that the survey examined all treelines/hedgerows onsite where badgers might occur. The badger habitat suitability assessment was conducted in line with the following relevant guidance for badger:

- Scottish Badgers, 'Surveying for Badgers: Good Practice Guidelines',
- The Mammal Society, 'Surveying Badgers,;' and,
- NRA, now TII, 'Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes'.

Upon the findings of the survey, **no evidence of badgers were recorded** within the proposed development. Please refer to Section 4.2.2 of the revised EclA for full details. As a result of the findings of the survey, no design changes were deemed necessary.

***(k) The Landscaping Plan for the site shall be reviewed with a view to retaining and bolstering tree/hedgerows where feasible. The landscaping plan shall be updated as follows:***

The Landscape Masterplan Plan prepared by Forestbird Design has retained and bolstered the higher quality treelines and hedgerows on site with the greatest potential long-term benefit to biodiversity (please refer to the submitted landscape drawings L203-207 for further detail). It retains 100% of treelines and the entire eastern grass ditch boundary, which is the most important lower quality hedgerow due to its interface with the adjacent rural site. The scheme also includes an extensive proposal for new hedgerows and treelines (660 lin.m.) that are true contiguous biodiverse hedgerows, over and above the proposed amenity planting. The modified Landscape Masterplan (L206\_revC) submitted in response to this further information request by Cork County Council further strengthens the proposed tree lines by adding an additional 65 no. native trees.

***l) The Planting Scheme includes wildflower meadows. The use of wildflower is generally not supported by the Planning Authority given that naturalisation of grassland areas is a more preferable method of creating wildflower meadows and reducing potential for the introduction of invasive species and species not specific to the local area. The Landscaping Plan shall be revised to allow for the management of grassland allow for the growth of flowers that would naturally occur within the site and its surrounding environs.***

We acknowledge this statement from Cork County Council, and can confirm that this is the landscaping design intent for this development. For further clarification, please refer to the Landscape Masterplan by Forestbird Design, Drawing L206\_revC, under the "Biodiversity Swales" heading. References to the term "wildflower" should be considered as "an area of naturalized grassland using topsoil salvaged from the site, enabling the native residual seed stock to gradually re-emerge. At installation, the salvaged soil will be seeded with native red/white clover to enable quick soil stabilization and 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.

***M) There a number of species listed which are non-native and are not in line with All Ireland Pollinator Plan. You are requested to revise the species list to include native trees in so far as possible and species that are non-native should be in line with the All-Ireland Pollinator Plan.***

The submitted landscaping plan included 70% native species and 30% non-native. The revised Landscaping Plan submitted as part of this further information response has been amended so that natives constitute 89% of the proposed trees, with non-natives trees at 11% within the proposed development. The non-native tree species have been included specifically for use within the urbanised zone for 3 reasons.

1. Performance within areas confined by roads, services and footpaths with exposure to urban pollution and resident safety (low likelihood of limb breakage). We do not have a suitable native tree that can perform well and in a safe manner in these urban conditions;
2. The LVIA noted the need/benefit of large canopy trees towards the top of the hill. With Ash (largest tree) no longer viable, Oaks are the second tallest trees but are substantially smaller and slower growing than what best suits the site. In the urban parkland situations, select non-native trees with double the canopy size are best suited to the proposed scheme; and
3. Best practice in terms of accommodating Climate Resiliency means including a diverse range of tree species and characteristics.

With a limited number of native trees (loss of Elms and Ash), including some non-native species that have acclimatised over time allows a greater chance of a continuous tree canopy to provide coverage for larger birds and bats. It should be noted that non-native species are only identified in the urbanised core. It should be noted that the All-Ireland Pollinator Plan (AIPP) does not have a species list suitable to roadside avenue planting. The trees serve as habitat resting and commuting routes, not as pollinators. The non-native trees are all large canopy trees. Any small-medium canopy trees are 100% native. There is no AIPP substitution for large canopy trees. The proposed hedgerows and biodiversity treelines are also 100% native. Our understorey shrub list fully meets the AIPP recommendations.

***(n) Any new hedgerows shall be planted in accordance with Hedgerow Planting shall be in line with the latest Teagasc Guidelines or the BRIDE Project – Farm Habitat Management Guidelines.***

As designed, the proposed tree lines and hedgerow supplements follow the guidelines of both the Teagasc Guidelines and the BRIDE Project – Farm Habitat Management Guidelines. Part 8 of the BRIDE project guidelines describe methodologies and a planting schedule for hedgerows. The species identified on the Landscape Masterplan by Forest Bird Design Drawing No. L206\_revC, fully complies with this and are influenced by the native species present on site. At Teagasc Moorepark (Fermoy, Co Cork) they have installed over 1km of new hedgerows. We have used this as a guideline and further increased our “Urban Woodlands” on site by 15% within the revised scheme submitted to Cork County Council as part of this FI response.

## **Item 2: Traffic Transport**

***(a) The submitted traffic impact assessment is not satisfactory. A more detailed traffic survey is required. An automated traffic survey carried out over 7 consecutive days at a time when normal traffic conditions are observed (i.e. when school are open and no bank holidays) should be carried out. The timeframe for this survey shall be agreed with the local area office.***

It is unfortunate this request did not form part of the Councils Opinion as the scoping of the traffic impact assessment was submitted as part of the 32B meeting request. Nonetheless, Hegsons Design



Consultancy Limited have engaged with Cork County Council following the further information request and it was agreed that a more detailed traffic survey consisting of a total of 7 no. automatic traffic counts (ATC) locations were required. These locations were on the arms of the Avoncore Place / Broomfield Court junction and the R626/Northern Relief Road/Avoncore Place signalised junction and have been outlined in Figure 2.1 of the submitted Addendum to the Traffic and Transport Assessment (November 2023) as part of this response.

The detailed surveys were carried out over 7 consecutive days at a time when normal traffic conditions were observed (schools open and no bank holidays, etc). The surveys were undertaken between Tuesday 20<sup>th</sup> February 2024 and Monday 26<sup>th</sup> February 2024 inclusive. The locations of the surveys and the timeframes were agreed with the officers of Cork County Council in advance of the surveys being undertaken.

***(b) The storm sewer in the Park Hill Development laid isn't taken in charge therefore, you will need to show written permission/legal interest/ agreement from the Park Hill development showing they can discharge it.***

Please find letter of consent from Caraden Construction Ltd to Castle Rock Homes (Midleton) Ltd to allow use of the underground pipework along the local road (L7630) for the purposes of storm and foul discharge from the permitted development under Ref: 18/7236 (Park Hill View Estates).

***c) The road alignment at the point where the Park Hill Development widening works terminates at your widening works begins is unclear. You shall submit a drawing clearly detailing same.***

Please refer to a new detailed drawing – Proposed Road Improvement Enlarged Part Details 1 and 2 – drawing no. 22/6732/P-111 by BOK & Associates. Detail 2 within the plan illustrate the additional details of where the Park Hill widening terminated and there the proposed road widening works begin as part of our proposed development.

***(d) It is unclear how the proposed road widening will terminate the north of the subject site. Please submit a drawing clearly detailing same.***

As above, please refer to a new detailed drawing – Proposed Road Improvement Enlarged Part Details 1 and 2 – drawing no. 22/6732/P-111 by BOK & Associates. Detail 1 illustrates how the proposed road widening will terminate at the north of the site. In addition to this, the local road improvement vertical alignment plan, drawing no. 22/6732/P-1115 by BOK & Associates shows a longitudinal section through the proposed road widening. Please refer to the submitted detailed drawings for further information.

***e) There is an existing ramp in close vicinity of the proposed access no. 1, the southern entrance. You propose a pedestrian crossing from the footpath on the western side of the road to the proposed access no. 1. Please clarify if this is an upgrade to the existing ramp or a new one.***

The existing ramp which has been provided as part of the Park Hill Development will be upgraded in order to accommodate the proposed pedestrian crossing from the footpath on the western side of the road to the proposed access No. 1, the southern access. Details of the works required to upgrade the existing ramp to accommodate a pedestrian crossing will be identified at detailed design stage and agreed with officer of Cork County Council in advance.

### Item 3: Design and Layout

- (a) Please note the proposed layout is not wholly satisfactory of the planning authority and does not adequately address concerns/issues raised at pre-planning stage, including accordance with the stated objective MD-R-26. To address these layout and open space, visual amenity issues, and aligning ecology and landscape concerns above, you are requested to implement the following changes/alterations to the layout.**
- (b) To protect the residential amenities and privacy of extant dwellings, 8 no. duplex units in the South West Section of the site should be omitted, namely units 9-12, 21-24 on the lower row and units no. 35 – 38 and 49-52 on the upper row. The area/footprint vacated by these units should be duly landscaped to help provide and additional visual and screening buffer to existing residents of the Blossom Hill and Hollyridge development. In addition, the hammerhead turnings areas shall be removed from this area. It is advised that revised drawings reflected this request be submitted.**

In order to accurately assess the impact of the requested omission of the 16 no. units identified, 3 no. investigative photomontages were produced by GNet3D. These included Views 2, 5 and 6 as representative sensitive viewpoints of the original scheme layout. An analysis of this request has been undertaken by Forestbird Design and presents extracts of the LVIA images, showing both the scheme as designed at application stage and with proposed omission of the 18 no. units identified by Cork County Council in their further information request. Please refer to Drawing No. LVA7 by Forestbird Design for further details.

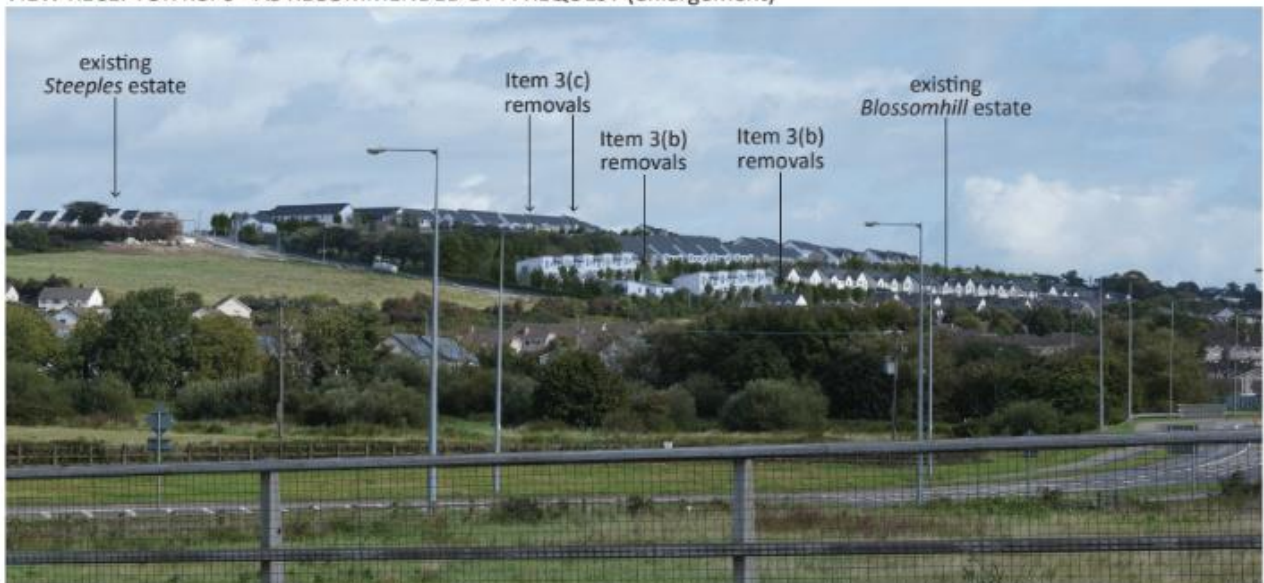
As noted within the LVIA analysis of the request for further information, the omission of the duplex units would result in no visible change to these Views. However, an increased woodland buffer between the duplexes and Blossomhill would be welcomed to improve the visual separation between the two sites. As such, a woodland buffer has been provided within this section of the site.

Within View Receptor 6, the omission of the upper duplex units results in a visual replacement by background houses, so the change is negligible. The recommended removals within the scheme and the omissions results in no change to LVIA.

VIEW RECEPTOR no. 6 - AT ORIGINAL APPLICATION (enlargement)



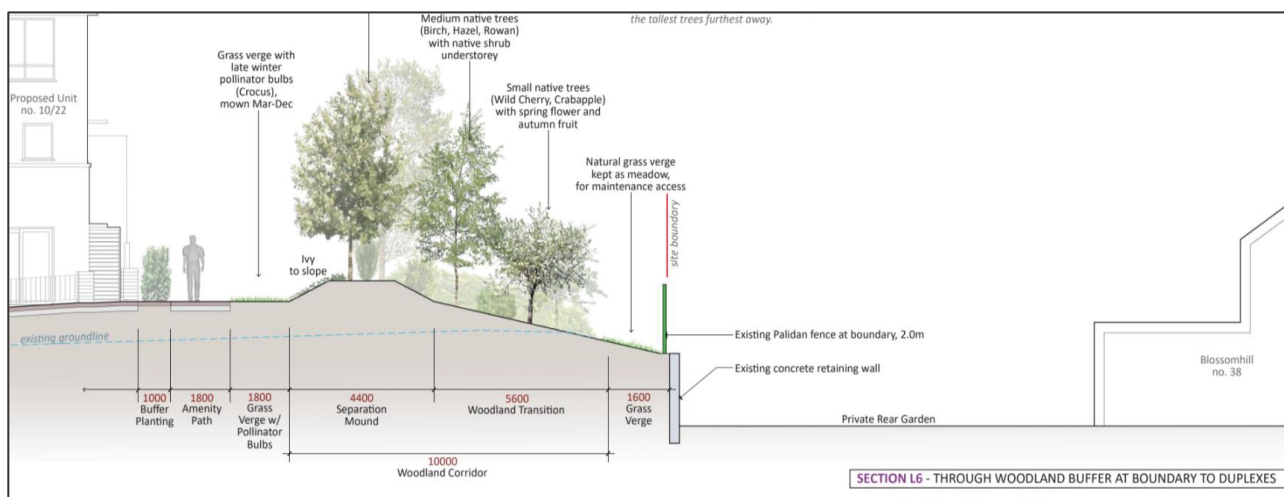
VIEW RECEPTOR no. 6 - AS RECOMMENDED BY FI REQUEST (enlargement)



In response to the Council's request in relation to the existing residents of Blossom Hill and Hollyridge development, a revised scheme has been submitted which proposes a large woodland buffer along the southeastern and southern boundary which benefits the privacy of the existing residences. As outlined within the Landscape Masterplan by Forestbird Design, a total of 105 no. new trees are proposed within this area which range in tall native trees such as Oak, Alder with Evergreen Holly internally as a visual buffer. The proposed landscaped area will also consist of medium native trees such as Birch, Hazel, Rowan and small native trees such as Wild Cherry and Crab Apple trees. The proposed trees are layered by height with the shortest trees nearest the boundary and the tallest trees further away from the site boundary. Within this area the landscape intent is to create an urban woodland corridor as a buffer to the site boundary. This corridor offers several benefits as it provides a biodiverse habitat through the provision of native trees and shrubs where fauna can exist with minimal human interaction. It allows the site to be linked east to west by a continuous urban woodland. The buffer also provides a strong visual

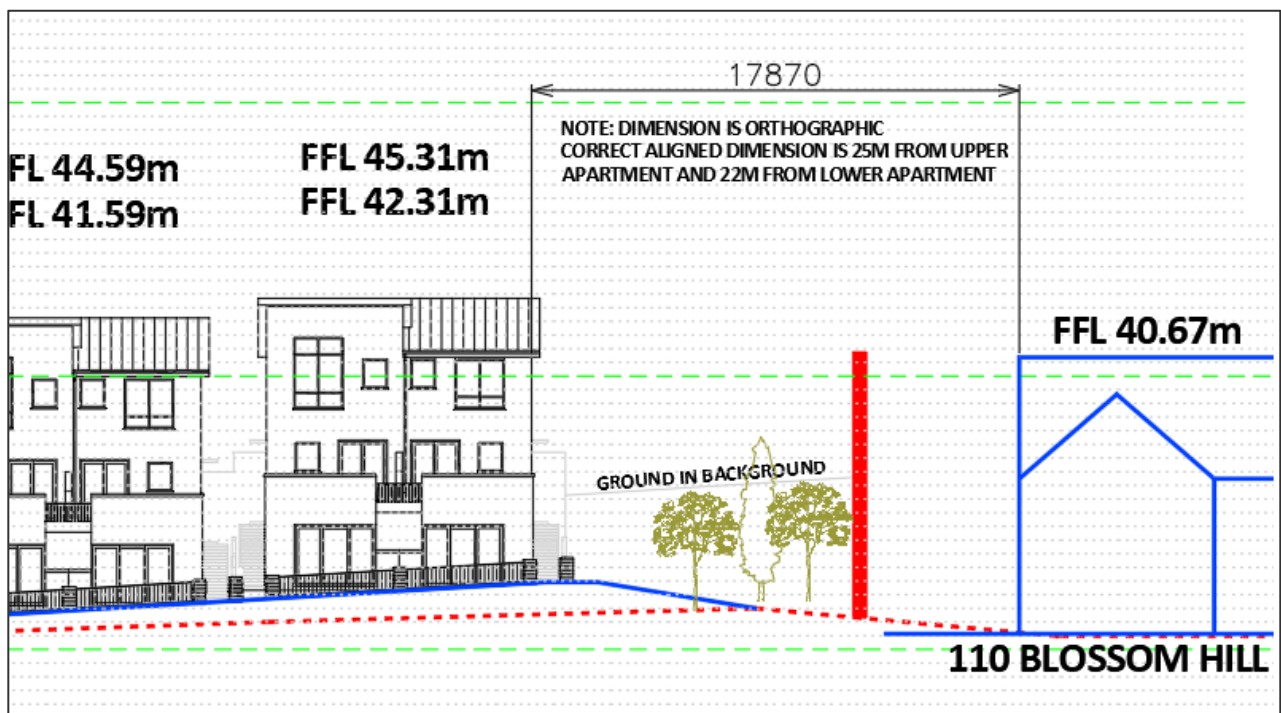
and physical screen to the adjacent residences. This is further strengthened by a modest mound within the woodland, serving as a physical deterrent and visually obscuring views through to neighbouring lands. The concept continues along the entire eastern edge of the duplexes, for a uniform buffer to the Blossomhill and Hollyridge estates.

Additional details have been provided within the architectural drawings by BOK & Associates and the landscaping masterplan provided by Forestbird Design. In addition to this, further drawings have been submitted and a section plan through the woodland buffer at the boundary to the duplexes has been prepared by Forestbird Design, refer to the Boundary Section L6 - Drawing L216 by Forestbird Design.



Upon reviewing the relationship to the adjoining property to Blossom Hill and Hollyridge Estates, it was considered the removal of 16 no. units was excessive and the issue raised could be better addressed without a more modest loss of units. As illustrated within the revised drawings submitted as part of this response, an appropriate distance and visual buffer can be provided with the removal of 1 no. duplex building. The revised site layout plan omits 4 no. units, units 11, 12, 23 and 24, within the southeastern corner. We submit that the revised layout achieves the appropriate relationship between the existing and proposed residential development with minimal impact on the residential amenity of the existing houses. The revised design is also cognisant to the newly adopted Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities (2024) which requires residential densities in the range of 30dph to 50 dph (net).

Due to the oblique angle and provision of a new woodland buffer to the east of the units, there is no impact on the residential amenity from the upper rows of units towards the existing houses at Blossom Hill. As outlined in the site layout plan and street elevation drawings provided by BOK and Associates, there is a separation distance of 22m from the duplex units to the existing end of row houses on Blossom Hill. Refer to the street elevation G extract below which demonstrates the relationship between the proposed development and existing development of Blossom Hill.



Within the revised design, as shown on the Site Layout Plan Drawing No. P1100 prepared by BOK and Associates, the hammerhead design of the turning areas have been omitted and replaced with 8m x 8m turning points. The omission of the turning heads within this part of the site has allowed the scheme to provide for enhanced screening which further protects the amenity of the existing and proposed units has been provided on the landscaping plan. Please refer to the drawings submitted by BOK & Associates and Forestbird Design for further information.

- (c) The provision of 'useable' Public Open Space provision (quality and quantity) has been marginally improved, the fundamental concern identified at pre-planning stage has not been addressed. It was advised at pre-planning that a focal or primary area of public open space be provided at the northern end of the site (near the apex of the site) to take advantage of the relatively gentle slopes and to align with the objective to minimize visual impact of this elevated site. This location would help deliver an appropriately scaled and proportioned usable open space, commensurate with the scale and nature of the development which is characterized by family homes.***

***It is considered that units numbered 215-224 and 239-245 should be omitted to facilitate the public open space and generous planting plan and break up an otherwise continuous and extensive breach of the ridgeline, in aggregate with the permitted scheme to the west, which is under construction. Units numbered 225-228 and 235-238 should be reorientated to address the open space (being created) to the north of same and provide appropriate passive surveillance and enclosure. Units lost as part of layout amendments could be replaced elsewhere across the development, including minor inclusions into the central amenity routes (walkways) and incidental spaces abutting units 229, 234, 211, 264, 159 and 176 for instance to retain/achieve required target density.***

The quantum of usable open space was clarified in the planning application documents with a comprehensive landscaping masterplan which detailed each of the proposed public open spaces. The revised scheme provides usable public open space with 18.5% of the net developable site area which is above the upper level of the requirements. The public open spaces have been distributed throughout the site in line with best practice to ensure that these spaces for different age groups are easily accessible throughout the site rather than having one large space at the periphery of the site. Moreover, within the new Compact Settlement Guidelines, the objective of public open space states: *'The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.'*

In response to the query from Cork County Council in relation to the potential breach of the ridgeline, which is inevitable in the context of the lands zoned, GNet3D have prepared a comparison view for 3 views (Views 2, 5 and 6) which represents the sensitive viewpoints and has omitted the houses identified in the request for further information by Cork County Council. This is further illustrated in the landscape and visual impact assessment, drawing no. LVA7 by Forestbird Design and an extract of the view receptor 2 is shown below.

As outlined the Landscape Visual Impact Assessment by Forestbird Design, the omitted duplexes result in a greater visibility of the Sycamore tree row surrounding the water treatment facility. However, this tree row already stands proud. With the existing Steeples estate and negligible modifications to the ridgeline, the omission of units within the proposed scheme results in no change to LVIA impact. As shown in the view receptor no. 2, the 18 no. houses have been omitted as queried by Cork County Council and the result is virtually imperceptible. It is evident within this view that the proposed removals occur to the background. Foreground ridgeline houses and trees remain as designed and form the new ridgeline. Within the detailed Landscape and Visual Impact assessment by Forestbird Design, it is clear that the recommended omissions of units are unnecessary and will not impact the LVIA.

Within View receptor no. 5 - The omitted 18 no. houses sit to the back of the hilltop and are virtually imperceptible when removed. There is a miniscule visual change behind the amenity spine open space and is one that will disappear as the intervening trees mature over time. The recommended omissions are unnecessary from an LVIA perspective.

Within view receptor no. 6 - the 18 no. houses have been omitted from the northern part of the site and in this instance the removals are not perceptible as noted within Drawing No. LVA8 by Forestbird Design. It is confirmed that there is no change to the ridgeline of houses, as the foreground houses and trees remain as designed and are the ones that form the new ridgeline. The recommended omissions are unnecessary from an LVIA perspective.

VIEW RECEPTOR no. 6 - AT ORIGINAL APPLICATION (enlargement)



VIEW RECEPTOR no. 6 - AS RECOMMENDED BY FI REQUEST (enlargement)



Despite providing a large open space, this request does not achieve the desired intent to mitigate interpretation of the ridgeline. The removals are located north of the apex of the hill. With the majority of the impacted long-range views arising from the south the recommended removals are imperceptible. Additionally, such an open space is distinctly separate from the bulk of the development, serving only a modest number of houses. We feel it is more appropriate to provide a larger open space more centrally located along the amenity spine and where there is greater benefit to ridgeline views. (refer to the amended layout on L206\_revC).

Following the request from the Council in relation to the concerns to the amenity spaces to the north of the site, the design has been modified in a manner which achieves a suitable balance whilst also being compliant with objective of the MD-R-26 requirement in terms of density and providing large usable open spaces on the more level area of the site. Within the revised site plan prepared by BOK & Associates,

units 251 – 254 have been removed and units 220-242 have been moved east of the site with rear gardens for the terraced units reduced to a 10m depth to provide a larger open space (formerly amenity space 2). This enhanced amenity space (as shown below) and given its more central location is a more appropriate solution within the development. The northern hilltop amenity is located at the top of the hill and has increased in size making it a more focal amenity which is 1800m<sup>2</sup> in area. This proposed area will also provide a high biodiversity value as 25% of the area is dedicated to pollinator shrubs with a tree line link within the area. The space also provides a framework for a safe play zone and the internal amenity path enhances the sense of separation and special place. The area will provide a formal play area designated for a wide range of ages (1-12 years) an amenity lawn, (800m<sup>2</sup>) which is a level grass area and 2 no seat benches. As shown in the image below, the revised open space to the north of the site.



We trust that the enclosed information is to the Council’s satisfaction and addresses all of the issues raised in the Council’s further information request. Please do not hesitate to contact the undersigned if you have any queries.

Yours sincerely,

*Mairead O'Callaghan*

McCutcheon Halley