

Development Management - Planning
Department of Community, Culture and Placemaking
Cork City Council
City Hall
Cork

10th October 2024

RE: APPLICATION REGISTER REFERENCE 24/43031, APPLICATION FOR PERMISSION FOR LARGE-SCALE RESIDENTIAL DEVELOPMENT COMPRISING THE DEVELOPMENT OF 246NO. DWELLING UNITS AND ALL OTHER ASSOCIATED SITE DEVELOPMENT WORKS ON A SITE AT RINGWOOD, SHEAN UPPER, BLARNEY, CORK.

RESPONSE TO REQUEST FOR FURTHER INFORMATION (RFI) DATED 21ST AUGUST 2024.

Dear Sir/Madam,

We, Coakley O'Neill Town Planning Ltd. of NSC Campus, Mahon, Cork, are instructed by the applicants, Clockstrike Ltd., to respond to the Planning Authority's Request for Further Information dated 21st August 2024 in respect to this Large-Scale Residential Development (LRD) at Ringwood, Blarney, Cork City.

Our response hereunder follows the format of the RFI:

1. Drainage

(a) Number of Attenuation Tanks

The design submitted at Opinion Stage included 3Nr. attenuation tanks as part of Phase 1. The applicant was requested to clarify if consideration was given to the overall drainage strategy for the development (Phase 1 & Phase 2) to reduce the number of tanks and ensure they are located in appropriate areas.

The revised design submitted as part of this application now includes 4Nr. attenuation tanks as part of Phase 1.

This application has increased rather than reduced the number of attenuation tanks and has not clarified if the drainage strategy will accommodate the drainage from Phase 2.

- *Please clarify why the number of attenuation tanks has increased.*
- *Please clarify if the drainage strategy for Phase 1 takes account or makes allowances for Phase 2.*

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Response:

Consideration was given to the overall drainage strategy for the development to reduce the number of tanks and ensure they are located in appropriate areas. The number of tanks increased with the evolution of the overall design and the increase in residential unit numbers that resulted in response to the City Council's LRD Opinion.

The drainage strategy will accommodate the drainage from Phase 2.

Please see enclosed response prepared by the applicant's engineering consultants, MHL & Associates, addressing this item in greater detail and setting out the evolution of the drainage system's design.

Note that this response submission provides details and clarification on the drainage system without changing the original design.

(b) Attenuation Tank Details

The Drainage LRD Opinion Report raised concerns over the size of the 3Nr. attenuation tanks proposed as no details or dimensions were provided.

The revised design submitted as part of this application now includes 4Nr. attenuation tanks and the dimensions and details of the tanks have still not been provided. Layout drawings are provided but the tanks are not dimensioned.

The Drainage Impact Assessment states that interception storage is to be provided under the tanks by providing stone filled infiltration under the tanks. This is not shown in the attenuation tank drawing and Drainage Report Page 4 of 6 no detail is provided on how water gets to the area under the tank. We would have significant concerns with this proposal and highlight that attenuation tanks should sealed concrete tanks.

- ***Please provide fully dimensioned general arrangement drawings for each attenuation tanks.***
- ***Please review the proposed interception storage under the attenuation tanks.***

Response:

Please see enclosed the detailed submission of MHL & Associates, which includes fully dimensioned general arrangement drawings showing the dimensions and details of all tanks.

The submission also provide clarity on the interception storage under the attenuation tanks.

The applicants trust that sufficient information on the design and specification of the proposed attenuation tanks has now been submitted.

If required, they are happy to clarify anything further arising by way of compliance with an appropriate pre commencement planning condition.

(c) Attenuation Tank Access

The Drainage LRD Opinion Report raised concerns over access to the proposed attenuation tanks during operation and maintenance. The applicant was requested to clarify how the tanks will be accessed and maintained safely which was not addressed in this application.

Please clarify how each of the 4Nr. proposed attenuation tanks will be accessed and maintained safely. This should include highlighting where plant and machinery can be parked and located safely during maintenance works. It should be noted that it is the duty of designers to ensure a project can be constructed and maintained safely. This includes the identification, and elimination or mitigation of risks during the operation and maintenance phase.

Response:

Please see enclosed the detailed submission of MHL & Associates, which demonstrates how the proposed attenuation tanks can be safely accessed during operation for maintenance.

(d) Detention Basins

This application includes 4Nr. detention basins which were not proposed in the scheme submitted at Opinion Stage. The Engineering Design Report submitted at Opinion Stage discussed a range of SuDS features, not all of which were proposed as part of the scheme. This included detention basins. The areas now proposed as detention basins were previously labelled as kickabout areas in the stormwater drainage drawings submitted at Opinion Stage. Furthermore, 3Nr. of the proposed detention basins are located on top of the proposed attenuation tanks (i.e. 1a, 1c, 1d).

- *Please detail how the proposed detention basins will function and if they are interconnected with the attenuation tanks.*
- *Please provide full details, layout drawings, cross sections and storage volume calculations for each of the proposed detention basins.*
- *Please clarify how long the detention basins will be wet or hold water following a range of storm events from 50% AEP up to the 1% AEP.*
- *Please clarify the side slopes and maximum depth of water in each of the detention basins and if there are any overflow controls.*
- *Please clarify the level of the water table and any risk of floatation for each of the attenuation*

Response:

The drainage system has necessarily evolved as the proposed development scheme has progressed through pre-planning to full planning application stage.

The incorporation of SUDs measures is supported by Development Plan policy and has been encouraged by the Planning Authority at pre-planning stage. These too have evolved as the scheme design has been progressed.

The inclusion of detention basins is not uncommon and they can be found in other residential schemes in the city and elsewhere, often with both drainage and recreational functions. It is submitted that their dual use as kickabout areas represents a beneficial use of space within the scheme.

Please see enclosed the detailed submission of the applicants' engineering consultants, MHL & Associates, which clarifies that the proposed detention basins are interconnected with the attenuation tanks and demonstrates how this interconnectivity will function.

Full details, drawings, cross sections and storage volumes of the basins are also provided in the submission, as is clarity on their status during storm events, their side slopes and overflow controls.

No changes to the detention basins or the drainage system design are proposed in this Response.

2. Architecture

a. The provision of the additional apartment blocks east of the scheme is welcome in terms of achieving a higher density. The facades are well animated and the architectural language is consistent with the rest of the scheme. However 'Contiguous Elevation 5-5' suggests that the scale of the 4-storey block C may be excessive in the context of the neighbouring houses and the relatively elevated position within the site.

Similarly Block D may benefit from the same upper level metal-clad/set back treatment as the other apartment blocks in order to better integrate with the surrounding apartments and houses.

Please show consideration of these observations, along with sufficient drawn information to allow appraisal as to how these blocks will integrate within the topography and wider context of the scheme. Such drawn information should include a cross section through the blocks extending to the woods/pocket park either side, as well CGI views showing the blocks in relation to the surrounding streets and houses.

Response:

It would appear that there is an error in the referencing of Blocks C and D. Nevertheless, the intention behind the comments made in the Planning Authority's RFI have been addressed.

A new section drawing and CGI views have been prepared to illustrate the relationship between the apartment blocks and adjoining houses, which in terms of scale, height and massing, can be seen to be acceptable with no undue negative impacts arising.

The proposed material and finishes have been revised in accordance with the RFI.

Please see enclosed the submission of the applicant's architects, CCK Architects, addressing each of these issues in more detail.

b. No discernible changes have been made to the rear of units E01 to D06 which was the subject of item no. 3. e. Whilst a degree of passive surveillance is provided at upper levels of the surrounding units very little active frontage is provided at ground level, meaning that there is no clear 'ownership' of this space. Any potential for Apartment Block A to have a positive impact in that regard is obscured by the location of the bicycle parking shed and ESB sub-station, which in themselves may not be well overlooked.

Similarly, the geometry and placement of the duplexes above the carpark level reduces that relationship, as does the solid stone-clad guarding that separates the duplexes from the lower parking area.

We also have concerns in relation to passive supervision of the stepped access way connecting this space to the upper street, which might benefit from a more open, public realm treatment if it is the view that this will become a strong pedestrian desire line.

Please address with sufficient drawn information to allow appraisal.

Response:

The design and layout of the area to the rear of units E01 to D06 has been revised to address the concerns raised in the RFI. The ESB substation and bike shed have been relocated and the steps omitted. The design of units and parking spaces have been reviewed and modified to provide for a revised layout and more passive surveillance.

Please see enclosed the submission of the applicant's architects, CCK Architects, addressing each of these issues in more detail.

3. Childcare Facility

Concern has been raised, in a submission from Cork City Childcare, regarding the lack of childcare facilities in Blarney.

It is unclear, from the documentation submitted, if the proposed crèche is to serve Phase 1 exclusively or the entirety of Phases 1 and 2. Noting the concerns raised in the Cork City Childcare submission, and the commercial reality of childcare provision, it is recommended that a single crèche facility be provided, to serve both phases, as part of this application. It should have a minimum of 137 childcare places. Please address providing updated plans to show any alterations proposed.

Response:

The proposed childcare facility is to serve both phase 1 and 2.

Revised plans are submitted for the consideration of the Planning Authority providing for a crèche facility accommodating 137no. children.

This will provide for the needs of children in the proposed development and help address any existing shortfall within Blarney.

4. **Principle of Development**

Zoning Objective ZO 2.2, of the CDDP, states that development in the Residential Neighbourhood zone “must provide an appropriate mix of housing types and tenures along with the amenity, social, community and physical infrastructure required to promote compact growth, balanced communities and sustainable, liveable communities”.

The proposed development will represent a 25% increase in Blarney’s population (population is projected to be approximately 677 persons, existing population stated to be 2,779 as per Census 2020 figures). A number of third party submissions have raised concerns that there is not enough capacity in existing services in Blarney to cater for the proposed development. Specifically they identify deficiencies in GP services and local sport facilities.

Accordingly, please review the Social and Community Audit submitted to demonstrate, utilising updated capacity data, not lists of existing services as set out, that residents of the proposed development will have adequate access to the social and community infrastructure. If capacity cannot be demonstrated consideration should be given to providing for the required uses within the proposed development.

Response:

It is noted that the Cork City Development Plan states that Blarney *currently has a wide offering of community facilities including a library, garda station and health centre* but that as it grows in the coming years, *there will be new demands on social and community infrastructure (schools, recreational facilities, healthcare etc.).*

The applicants have now included for a crèche facility to accommodate 137no. children. The proposed development therefore now provides for its own expected childcare needs and addresses current under provision in Blarney.

In terms of educational facilities, it is of note that Scoil Mhuire gan Smál secondary school has recently been redeveloped to facilitate an increase enrolment of up to 1,200no. pupils. Enrolment numbers for 2023/24, as per the Department of Education figures, were 1,003no. pupils (532no. boys and 471no. girls) This gives a headroom capacity of c.200no. pupils, more than adequate to cater for any requirement arising from the proposed development, which is 61no. new enrolments.

In terms of primary schools, enrolment in Scoil Chroí Iosa over the past 5 years dropped from a high of 327no. in 2020/21 to 296no. this year, indicating a capacity of at least of 31no. places and at Gaelscoil Mhuscraí it dropped from a high of 179no. in 2021/22 to 175no. this year, indicating a capacity of at least 4no. spaces.

Using the Department of Education formula for the calculation of school demand (12% x Units x Household Size) and omitting the scheme’s 1-bed dwelling units, the primary school demand arising from the proposed development is 30no. new enrolments.

Existing capacity within the two primary schools within Blarney can cater for this. This doesn't account of other schools outside or in close proximity to the town which are likely to also cater for demand.

In the City Development Plan it is noted that the Department of Education carried out a *Preliminary Assessment of Additional Education Capacity in Cork* and identified that growth at Stoneview in Blarney would likely give rise to a need for 1 or 2 new or expanded primary schools and 1 new or expanded secondary school. It is expected that the Stoneview Framework Masterplan currently being prepared by the Planning Authority will identify appropriate locations for new educational facilities in accordance with this Development Plan need.

In terms of medical services, the Planning Authority will be aware that general practitioners are private practitioners. As such, they are free to establish their practice and work at a location of their own choosing. There is no prescribed ratio of GPs to patients within defined geographical areas and the State does not, and cannot, regulate the number of GPs that can set up in a town or community.

There are however currently c.2,540 GPs with a General Medical Services (GMS) contract with the State for the provision of GP services without charge to medical card and GP visit card holders.

In Blarney, following the closure of a GP practice due to retirement, the HSE undertook a recruitment campaign for the GMS vacancy in Blarney and several candidates were interviewed in early 2023. A GP was identified through this process and took up the position of the GMS GP for the GMS panel in July 2023. It was not possible to arrange for this GMS GP service to be based in Blarney. Instead, it is located in Blackpool, which has strong transport links to Blarney. For those with difficult accessing Blackpool, a change of doctor process was made available to those who would require it.

Existing medical services in Blarney include:

- The Medical Centre Ashdale House, Shean Lower, Blarney, Cork, T23 E06C
- Blarney Meical Centre, Monacnappa, Blarney, Cork, T23 EAY1

The HSE are actively progressing the development of a primary care centre in Blarney with initial tender submissions closing in the past month. A pre-requisite of the tender was that new GP services be provided for.

The Planning Authority will also be aware that the applicants have proposed a new primary care centre on a fully serviced zoned site at Ringwood, which has been subject to a pre-planning consultation submission made in March of this year. This facility is 2,101sqm in size and includes for a retail pharmacy and GP services.

In all, it is submitted that medical services, both existing and planned, will adequately meet any demand arises as a result of the proposed development.

In relation to recreational facilities, relevant quantitative guidance is found in the UK under Fields In Trust's *Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard*, which is quoted by Cork County Council's own Draft

Recreation and Amenity Policy guidance. The FIT guidance sets a standard of 1.2 playing pitches per 1,000 of population.

Blarney's population is currently 2,779 and is targeted to growth to 3,688 by 2028 under the City Development Plan's Core Strategy (Table 2.2). On this basis, there should be a total of 3no. playing pitches in the area to accommodate the targeted population.

The *Active Recreational Infrastructure (ARI) Needs Study* carried out in 2022 during the preparation of the Cork City Development Plan, 2022, noted that Blarney had the following ARI provision.

ARI - Sport Type	ARI - Facility Name	ARI - Type
Basketball	Scoil Mhuire gan Smál	Outdoor Asphalt
Basketball	Scoil Mhuire gan Smál	Outdoor Asphalt
GAA	Blarney Gaelic Athletic Association	Outdoor Grass
GAA	Blarney Gaelic Athletic Association	Outdoor Astro Turf / Synthetic
GAA	Blarney Gaelic Athletic Association	Outdoor Grass
Multi-Purpose	Scoil Mhuire gan Smál	Outdoor Grass
Skating	Supernova Activity Centre	Indoor

The Study also noted that Blarney United Soccer Club, with 2no. pitches, were located in Tower and that Blarney Golf Club was located in the nearby hinterland.

Since this Study was carried out Scoil Mhuire gan Smál has been redeveloped and now provides 4no. outdoor courts and a multi-purpose astro pitch. An Outdoor Exercise Zone has been constructed at Castle Close Lawn and improvement works have been undertaken at both the Waterloo Walking Trail and the Clogheenmilcon Fen.

The Study advised at the time that the provision of 2no. additional soccer pitches and 1no. tennis court should be considered in Blarney by 2028 and identified a number of locations where a specific sports zoning objective could be considered by the Council in the new Development Plan's core strategy and land use zoning regime.

The Council decided not to zone the subject lands, or any other development lands, for a sports use. They did retain the Public Open Space zoning on lands to the south of the Ringwood and it has always been the applicants' intention that this area become a new town park for Blarney as part of future plans to develop other areas within the wider Ringwood.

The Study also recommended that new ARI provision be considered in the new Major Development Area (MDA) at Stoneview. The applicants have made provision for new playing pitches at Stoneview in their own masterplan on topographically appropriate areas at the northern side and expect that the Stoneview Framework Masterplan, which is currently being prepared by the City Council, will also include for such provision.

Finally, it is of note that the Council's Parks Department are supportive of the development proposed and raise no concerns in relation to the provision of recreational spaces. Indeed, they conclude that the recreational spaces

provided for within the development will provide for the needs of children and have recommended a grant of planning permission on that basis.

Therefore, it is submitted that the Social and Community Audit clearly demonstrates the current situation in relation to the provision of such services in Blarney. Its conclusions that residents of the proposed development will have adequate access to the social and community infrastructure are robust, notwithstanding of the concerns expressed by third parties.

5. Infrastructure Development

Inconsistencies in the language used in various reports submitted with the application have been identified. Please confirm that the developer will deliver the improvement works on Station Road from the proposed entrance of the development onto the Junction with the R617 as part of this development.

Response:

The Station Road area has been included within the red line boundary of the planning application site. The works proposed to the public roadway have been identified and have been included within the application's development description, which expressly states the development includes *a new signalised access onto Station Road and road and footpath improvement works on Station Road and the R617 road.*

The applicants can confirm they will deliver the improvement works to the public roadway under licence from the Roads Authority.

6. Revised Environmental Impact Assessment Report (EIAR)

It is considered that the EIAR submitted has adequately addressed material potential environmental effects of the proposed development. However there appear to be some minor omissions. In the interest of clarity following further information is required.

a. Chapter 5 - Construction Strategy

Not all of the figures set out in the table of contents appear in the chapter. Specifically figure 5.4 does not show the site compound location. It is considered that, given the scale of the proposed development, the compound is likely to be of a significant size.

The location of the compound should be identified to ensure that it is assessed as part of the EIA. Please address.

Response:

The location of the site compound is identified on Drawing No. 21079HD-MHL-PCSCP01 enclosed with this Response submission. Its location is shown on Figure 5.1 of the submitted Construction Traffic Management Plan. This location was taken into consideration in the assessment undertaken in the submitted EIAR. No material change therefore arises.

b. Chapter 6 - Planning & Policy

City Development Plan 2022 2028 states that:

Tier 2 lands are serviceable zoned lands that are not currently fully serviced but have the potential to become fully serviced within the life of the Plan.

In the interest of clarity please describe how the subject site has overcome any service related constraints associated with this Tier 2 site.

The subject site does not have any service related constraints.

In relation to wastewater and water services provision, Uisce Éireann have confirmed the feasibility of this proposed development. Their latest submission to the LRD planning application again confirms this.

In relation to access, the Council's Infrastructure Report on the application welcomes the improvement works proposed by the applicants and concludes that the proposed development is compatible with the wider active travel proposals for Blarney.

The Council's Strategic Transport Planning Report states that at a strategic level the proposed development is supported and will assist Cork City Council in delivering on several key strategic principles in the Cork City Development Plan. It concludes:

In summary, the proposed development is located in zoned lands which will generate the required demand to support the delivery of enhanced public transport services earmarked for the Blarney area as recommended in CMATS. The proposed development is located in an area which is well served with local services (i.e. shops, schools, sports clubs, etc.) and the continued delivery of enhanced active travel infrastructure in Blarney will ensure access to such services is focused on active and sustainable transport modes.

The provision of this active travel infrastructure along Station Road will provide good opportunities for future residents to make shorter journeys on foot and or by bike and is welcome.

On the basis of the submission and confirmations of Uisce Éireann and the conclusions of the Council's own engineering and roads reports on the application, it can be concluded that the site can be properly serviced in a timely manner to progress development.

c. Other Further Information Items requiring EIAR updates/revisions:

The applicant is requested to update the EIAR to take account of any amendments or modifications to the proposed development required on foot the response to any other matter raised in this request for further information.

Response:

Please find enclosed an EIAR Addendum Statement. Amendments to the proposed development are not significant and are captured within this Addendum Statement.

Response to Third Party Submissions

Further to the above, we have reviewed the various third party submissions made in respect of the subject application along with the submissions made by prescribed bodies.

For clarity, lands at the rear of Woodville Terrace are not in the ownership of Council. They are in the ownership of the applicants. Although a wayleave does exist over an existing stormwater sewer at this location.

The Ringwood will be maintained and protected. A Woodland Management Plan has been prepared to ensure it continues to constitute an important feature in the landscape.

A Construction Management Plan, including a details on construction traffic has been prepared and demonstrates how the proposed development can be properly constructed without undue impacts upon the immediate area. The applicants will engage with local residents in the implementation of this plan should planning permission be forthcoming and the plan can include for a provision that does not allow construction workers to park on Station Road.

The Planning Authority should note that in response to the concerns raised by Blarney Castle, the applicants met with their representatives to discuss the potential for impact. Based on these discussions the applicants have committed to the planting of trees at Ringwood outside the red line boundary of the planning application site. These will help further screening the proposed housing development from views from Blarney Castle.

In relation to concerns raised by Transport Infrastructure Ireland regarding the drainage regime of the N20 national Road, the applicants have consulted with the M20 Project Team, who confirmed that they have reviewed the planning application and have no concerns regarding the potential for impacts on the proposed road scheme.

In relation to the submissions of residents raising concerns with the potential of impacts from the proposed apartments, we respectfully submitted that these are unjustified. The proposed apartments meet all relevant standards with respect to design, layout, and potential for impacts, including overbearance, separation distances, overlooking and overshadowing, all of which have been successfully mitigated against. There will be no undue loss of light or privacy for residents on Station Road.

In terms of the potential for traffic impacts, residents should be made aware of current plans at pre planning stage for the provision of a new access road from the R617 to Stoneview running through the Ringwood. This will provide for an additional main access option for residents of the proposed phase 1 scheme.

We trust these points bring clarity to the nature and extent of the proposed development and provide the Planning Authority with an appropriate context within which to consider the points raised in the third party submissions to the planning application.

It is considered that this response addresses in full the requirements of the Request for Further Information (RFI) dated the 21st August 2024.

The applicants have not provided any substantive additional information that either materially or significantly alters the proposed development as originally submitted to Cork City Council on the 27th June 2024.

We trust everything is in order and look forward to a favourable decision in due course.

Please forward all correspondence in relation to this correspondence to this office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dave Coakley'.

Dave Coakley
Coakley O'Neill Town Planning Ltd.