



**DAVID MULCAHY
PLANNING CONSULTANTS LTD**

67 The Old Mill Race, Athgarvan, Co. Kildare

PH: 045 405030/086 350 44 71

E-mail: david@planningconsultant.ie

www.planningconsultant.ie

Company No: 493 133 Directors: D. Mulcahy & M. Mulcahy

PLANNING STATEMENT & STATEMENT OF CONSISTENCY

regarding

**128 RESIDENTIAL UNITS, 5 COMMERCIAL UNITS, CHILDCARE
FACILITY & ASSOCIATED WORKS**

at

**ROSE HILL HOUSE & BALLINACURRA MILL,
BALLYNACORRA WEST, MIDDLETON,
CO. CORK**

Client: Ballinacurra Project Limited Partnership

19th January 2026

EXECUTIVE SUMMARY

Proposal	128 no. dwellings (92 no. new dwellings, 11 no. dwellings in existing structures, and 25 no. apartments), cafe and a crèche along with reuse of existing vacant mill buildings to provide 2 retail units, 1 medical unit, 1 office unit.
Site size	3.687 Hectares (gross)/ 3.63 Hectares (net of Cork Co. Co. owned land along Rose Lane)
Site Description	Brownfield site containing former mill complex and dwellings.
Zoning	Town Centre and Existing Residential/Mixed Residential and Other Uses
Context	Edge of urban settlement
Residential Net Density	Proposed - 43 units/hectare
Public Open Space	Proposed - 13%
Accessibility	Access from Rose Lane and Cloyne Rd
Foul Drainage	Connection to Public mains network available.
Sensitive Receptors	Neighbouring dwellings and across the public road to the north.
Planning History	Previous permission was granted for mixed used development but not acted on.
Built heritage	Former Ballinacurra Mill and Rose Hill House demesne, Protected Structures, Eastville House, NIAH
Natural Heritage	Natura 2000 site and pNHA located c.200m from the site.
Flood Risk	None on site. Stream to north-west of site at Kearny's Cross floods.

Planning Gain	Regeneration of long term vacant site with high quality urban development
	Sustainable new uses for long terms derelict Protected Structures
	Increased housing supply close to public transport
	Significant mix of housing types
	25 no. Part V units
	New commercial centre for the area
	Improvements to Rose Lane

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1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Ballinacurra Project Limited Partnership** to prepare a planning statement and statement of consistency for a proposed development consisting of 128 dwellings (92 new dwellings, 11 no. dwellings in existing structures and 25 apartments), cafe and a childcare facility along with reuse of existing Mill buildings to accommodate commercial units, and all associated works on lands measuring 3.63 hectares at the former Ballinacurra Mill Buildings (Protected Structure Ref. 523), Rosehill House (Protected Structure Ref. 520), and Eastville House (NIAH Ref. 20907636), Ballinacurra, Ballynacorra West, Middleton, Co. Cork.

The applicant is applying for permission via the Large-Scale Residential Development (LRD) legislation as there are over 100 dwellings involved. For clarity the commercial element is 6.13% of the gross floor area (less than 30% maximum of total LRD floor area).

The purpose of this statement is to outline the planning context for the proposed development in terms of the receiving environment, planning history and development plan policy and, to demonstrate consistency with all relevant planning guidelines, policies, objectives and standards.

The report will demonstrate that the proposed development:

- Accords with national and regional planning policy in respect of promoting development of underutilised brownfield sites close to public transport to deliver compact urban settlements.
- Accords with the Town Centre and Residential zoning objectives for the site.
- Will provide much needed housing supply and new commercial services in Ballinacurra.
- Will deliver a more intensive use of the site in accordance with national planning policy.

- Will involve the careful restoration of Rose Hill House and a number of Ballinacurra Mill Buildings.
- Provides a high quality public realm including hard and soft landscaped open spaces.
- Is compatible with neighbouring residential uses and will not have a material adverse impact on the established residential amenity of same.
- Will deliver a new public footpath along the north side of the site.

The report should be read in conjunction with the drawings prepared by **Fourem Architects (RIAI)** and other consultants where referenced.

For clarity this report includes:

- Planning Statement
- Statement of Consistency
- Housing Mix Statement

All maps are orientated due north. All underlined italics are author's emphasis.

2.0 SITE LOCATION & DESCRIPTION

2.1 Location

The lands are located to the south of Middelton town in the Townland of Ballinacurra¹ to the south-west of Kearney's² Cross, currently occupied by Rose Hill House and Ballinacurra Mill complex (both vacant) – see Fig No.1 below.

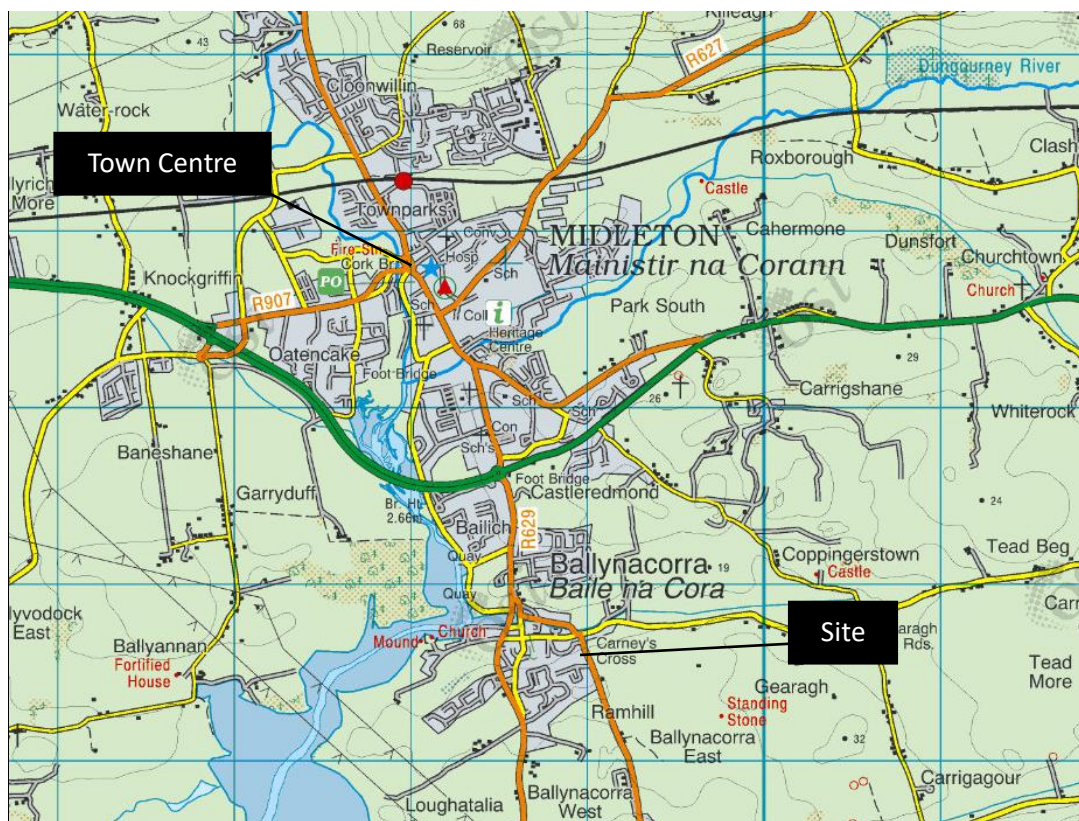


Fig No.1 Location of subject lands (Source: MyPlan.ie - OSI Licence No.EN 0080915)

¹ Also referred to on some maps as Ballinacorra.

² Also referred to on some maps as Kearney's.

2.2 Description

The subject site measures 3.687 hectares³ and currently contains derelict buildings with a gross floor area of 5,121sq.m (refer to demolition drawing showing same).

Former Mill Complex

The remains of a former mill complex, which was the subject of a fire in 2017 and 2023, are present on the northern portion of the site (east side) and are in a bad state of disrepair. The buildings are too dangerous to enter in most instances. The mill is a Protected Structure (RPS 523) and an archaeological monument (CO076-075). The maltings had a Cereal Testing Station. The cereal testing station is associated with notable barley creations which had a significant impact on the world brewing industry



Fig. No.2 View of the vacant Mill complex from Rose Lane to the north of the site

³ The red line boundary measures 3.687ha as it involves unregistered lands on Rose Lane. The net site area excluding Rose Lane lands is 3.63ha and this is the key site area for the purpose of determining density, plot ratio etc.



Fig No.2a View of the Mill complex from within the site.



Fig No.3 Drone photo showing the former mill building post fire damage.

Rose Hill House

Rose Hill House is a two storey dwelling located on the western portion of the site – Protected Structure (RPS No.520) and an archaeological monument (CO076-044). It is long term vacant and in a notably poor state of disrepair.



Fig No.4 Rosehill House, Protected Structure.

Dwellings

There are 2 no. vacant dwellings located to the north east of the site, both relatively modern but vacant and in a poor state of repair. One is a two storey dwelling (Eircode P25 CX98) and the other is a single story dwelling (Eircode Ref. P25 HH42). The single storey building between both dwellings with a metal sheeting type roof has an Eircode reference (P25 HR97) but this is not a dwelling. There is also a separate derelict cottage to the east of the site.



Fig No.5 2 no. dwellings to north east of the site at Kearney's Cross.

Eastville House is located to the north of the site (west side) and is included in the National Inventory of Architectural Heritage (NIAH), Ref. 20907636. There is no Eircode reference for this house. It has been vacant for a long period and is in a poor state of disrepair.



Fig No.6 Eastville House to the north of the site.

The remainder of the site is largely vacant.



Fig No.7 Subject site relative to the town centre. Red line is indicative only – refers to site location map submitted with the application.



Fig No.7a Subject site with key buildings identified (refer to survey drawing for more accurate reflection).



Fig No.8 Most up to date satellite image of the subject lands (source: Google Earth Pro, August 2022) with subject site outlined in red (indicative only).



Fig No.9 Drone image dated November 2024 taken from north-west corner of site facing south east.



Fig No.10 Drone image dated November 2024 taken from south-east corner of site facing both-west.

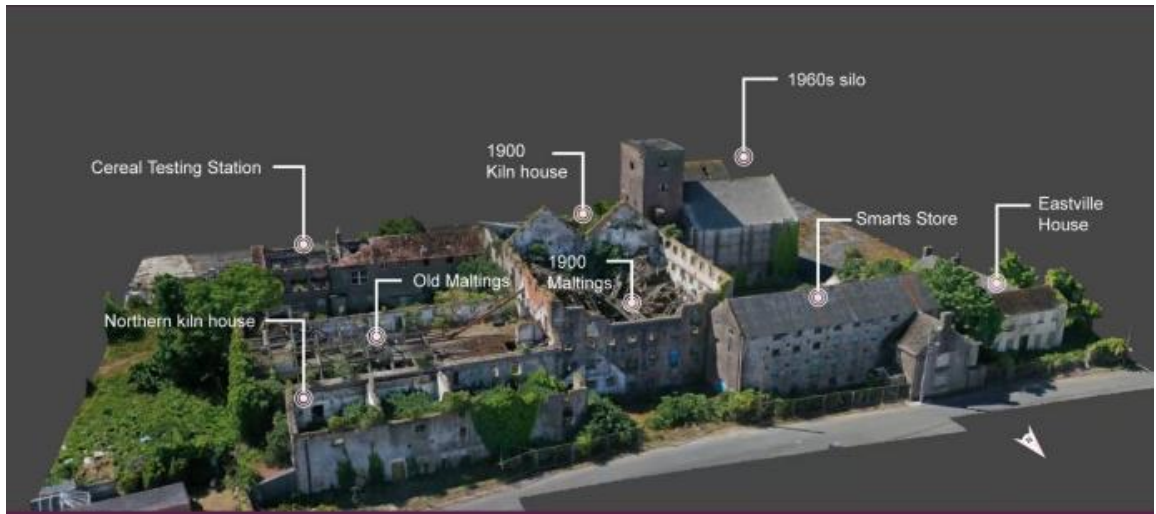


Fig No.X Labelling of mill buildings – source: Preliminary Industrial Archaeological Survey by Dr. Colin Rynne

There are a number of trees and tree groups on the site. The diagram below is extracted from the Arboricultural Impact Assessment and Tree Protection Plan

prepared by Holly Arboriculture and shows the trees (40 tagged, primarily to the west of the site) and the tree groups.

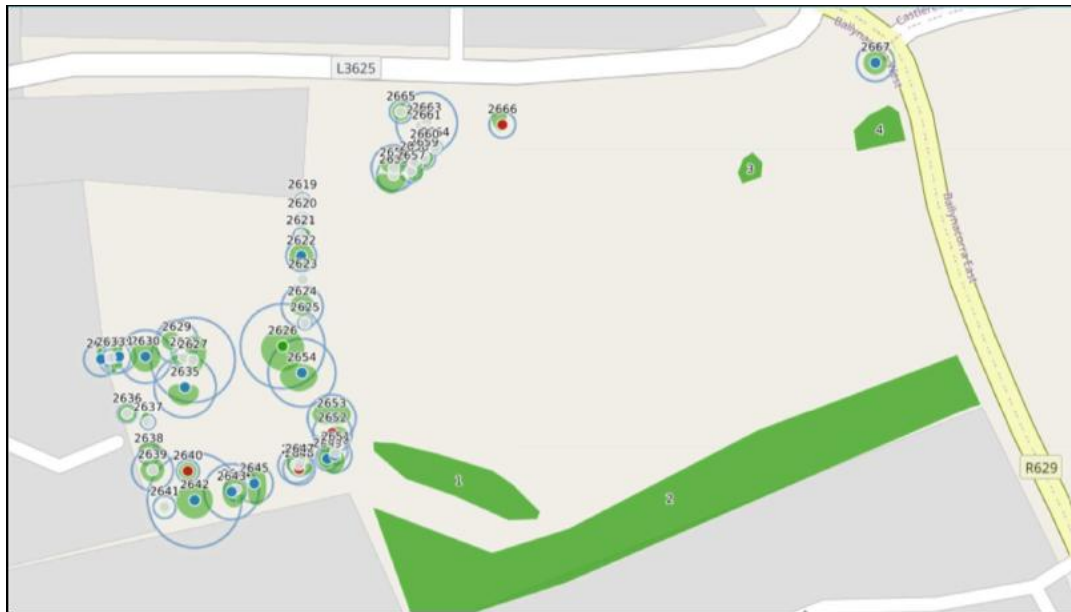


Fig No.11 Trees and tree groups located on the site – source: Holly Arboriculture.

2.3 Ownership

The applicant owns the site in its entirety. It consists of the following folios:

- Folio Number: CK180772F [3.39ha]
- Folio Number: CK25903F [0.12ha]
- Folio Numbers: CK79780F & CK41472F at Kearny's Cross [no size provided].

2.4 Adjoining Lands

North

The L3625 (Rose Lane) runs along the northern boundary of the site. It includes a public footpath along the western portion of the northern boundary and this footpath connects back into the village and into Midelton town.

There is also a residential area located north of the site (west end). It consists of a row of two storey terrace dwellings (1-7 Upper Road) and a modern block of 4

dwellings (Village House) both of which back onto the subject site (which is at a higher ground level). There is also a detached, two storey dwelling at the rear of Village House.



Fig No.11 Rose Lane running to the north of the site.

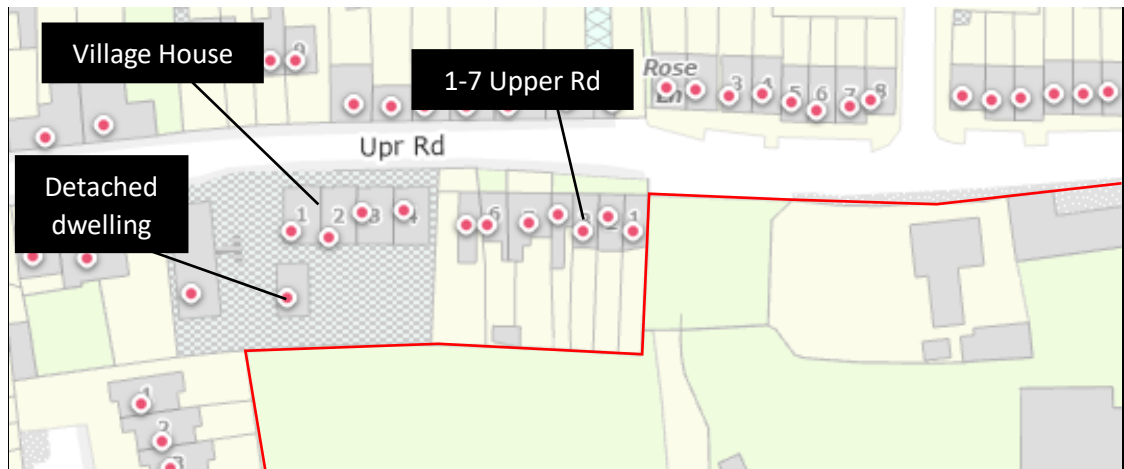


Fig No.12 Residential dwellings to the northern boundary of the site (west end).

East

The R629 (Cloyne Road) runs along the eastern boundary of the site. There is a notable slope in gradient from the south end (higher) to the north end (lower). There is a public footpath along the entirety of the site boundary.



Fig No.13 R629 to the eastern boundary of the site

West

There is a residential development located to the west of the site. It consists of a row of two terrace blocks, each containing 3 no. two storey residential dwellings – 1-6 Old Dairy. These dwellings have rear gardens which back onto the subject site. There is also a large area of the public open space adjoining the western boundary of the site (west of Rose Hill House). Finally at the south end of Old Dairy a gable end of an end of row dwelling faces toward the site (No.7 Old Dairy).

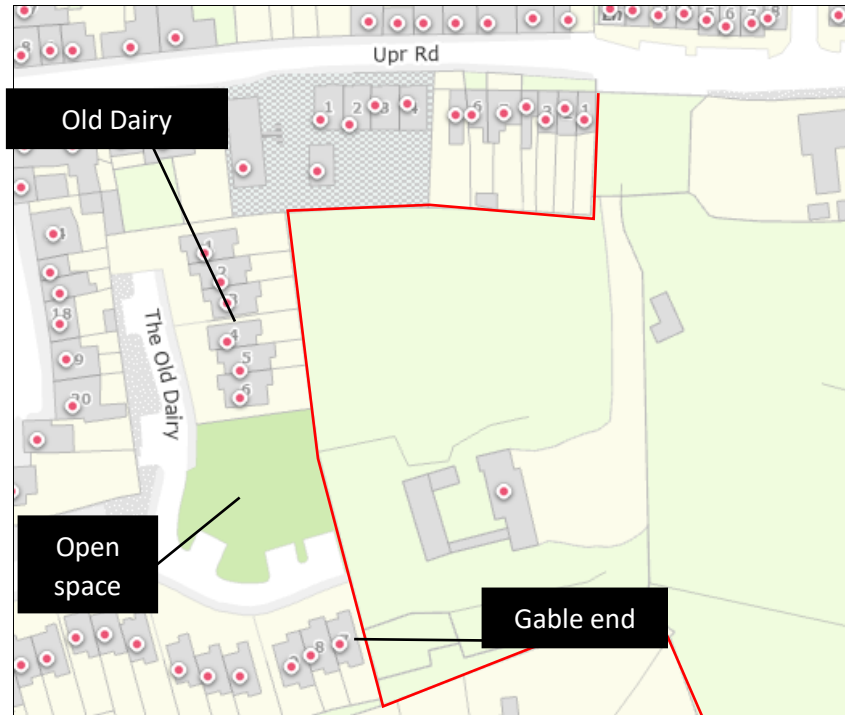


Fig No.14 Neighbouring residential development to west side of site.

South

To the south of the site there is a row of two storey dwellings whose rear gardens back onto the site. These dwellings are located at a notably higher level than the subject site.

2.5 Existing Connections

There is an established road and footpath infrastructure from the site into the services in the village (c.220m) and into Midelton town (c.2km).

2.6 Public Transport

There is a bus stop located on the Cloyne Road Junction c.270m to the north - west of the site. This bus stop serves the 240, 241, 261. There is another bus stop on the R630 (both sides of the road) at a distance of c.300m from the site serving the 241 and 261.

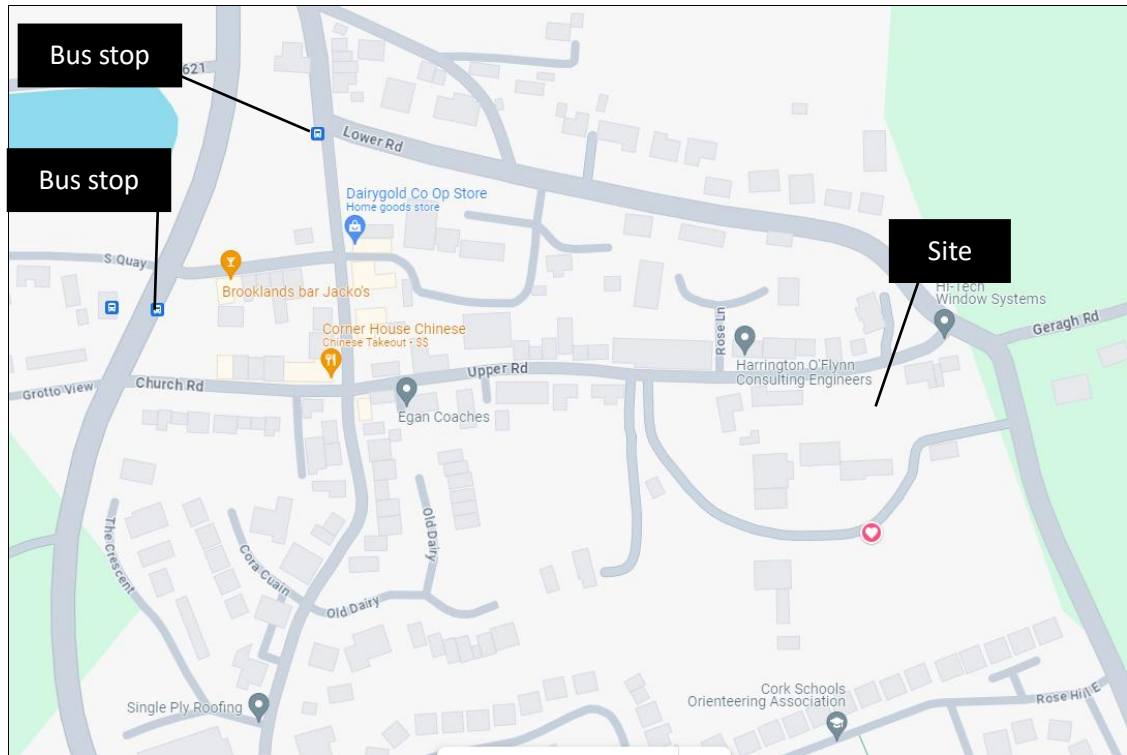


Fig No.15 Location of the site relative to bus stops in the vicinity.

2.7 Natural Heritage

There are 49 no. trees on the site, primarily on the east side in the vicinity of Rose Hill House.

The development site is not located within any Natural Heritage Area or proposed Natural Heritage Area. Great Island Channel pNHA (1058) is located 200m northwest of the proposed development.

The development site is not located within any Natura 2000 site (see Figure 3.1). Four sites are located within 15km of the proposed site, two SACs and two SPAs. Great Island Channel SAC (1058) and Cork Harbour SPA (4030) are the most proximal Natura 2000 sites, with both located approximately 200m northwest from the proposed development due to shared boundaries. There exists potential for impacts on both of these sites through fluvial connectivity from nearby watercourses. Ballycotton Bay SPA (4022) and Ballymacoda (Clonpriest and Pilmore) SAC (0077) are the remaining Natura 2000 sites within 15km of the

proposed development, located 10.6km southeast and 14.7km east respectively.

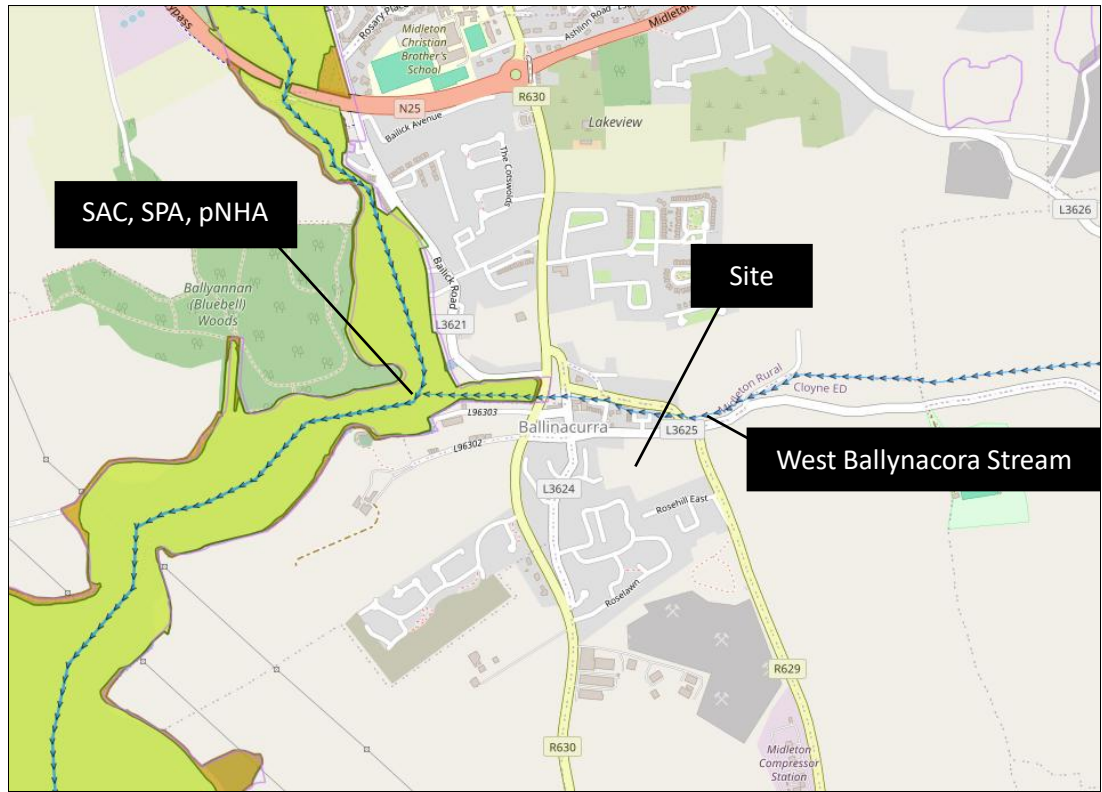
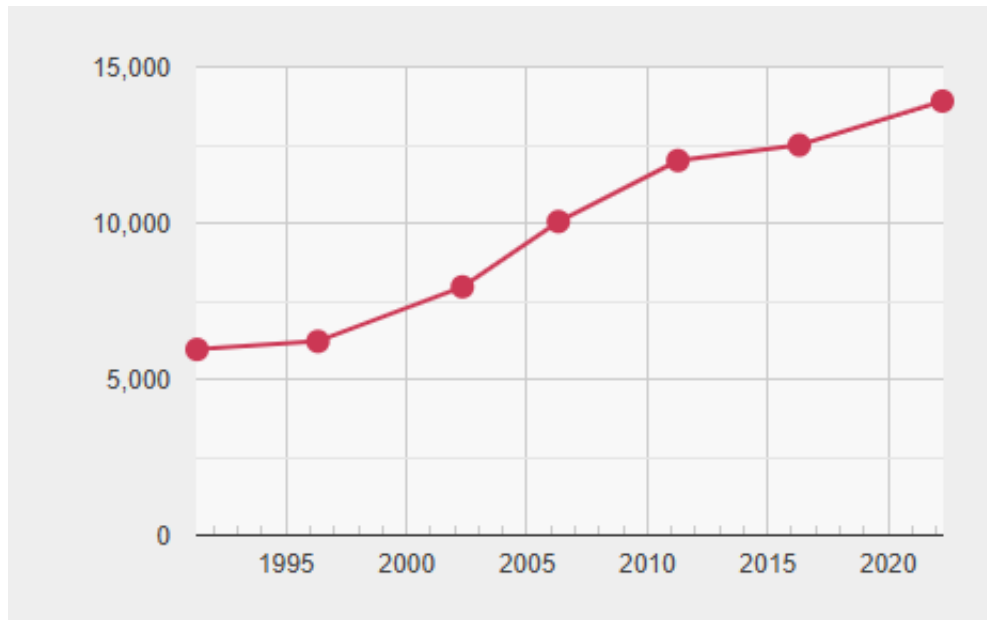


Fig No.16 Location of site relative to SAC, SPA and pNHA to north-west.

2.8 General Area

Ballinacurra is a harbour village located approximately 2km south of Midleton town. It was originally a separate settlement to Midleton serving as a port for Midleton but has gradually merged with the town itself. The old village centre of Ballinacurra (Main Street) contains a number of public houses, take aways and small shops/services.

Midleton town has a population of 13,906 at the time of the Census 2022 (persons living in Ballinacurra are included in this figure), an increase on the 2016 population of 12,496 (1.8% Annual Population Change). The population of the town has steadily increased since the early 1990s.



Name	County	Population Census 1991-04-21	Population Census 1996-04-28	Population Census 2002-04-28	Population Census 2006-04-23	Population Census 2011-04-10	Population Census 2016-04-24	Population Census 2022-04-03
Midleton	Cork	5,951	6,209	7,957	10,048	12,001	12,496	13,906

Fig No.17 Population information for Midleton, source: Census.

Midleton contains a wide range of services (education, community, religious), health (Midleton Community Hospital, dentist, pharmacies), retail outlets (including at Tesco's Superstore and Supervalu), recreational (Gate Cinema, fitness centres, farmer's market, restaurants, public houses, beauty clinics etc), sporting (GAA, rugby, hockey, cricket, basketball etc) and amenities (Midleton Lodge Park).

Midleton town is located approximately 20km from Cork City which is conveniently accessible by train, bus and private car.

The general area where the site is located in Ballinacurra is characterised by residential development, most of which is mature, two storey, suburban type housing with a small number of apartments.

The housing development to the north of the L3265 facing the site consists of terraced houses and presents a more urban edge along this street. The lands to the east of the R629 are in agricultural use. There is a stream which runs close to the north-eastern boundary of the site (on the opposite site of Kearney Crossroads) – called Ballinacurra Stream.

3.0 PLANNING HISTORY

3.1 Subject site & Adjoining Lands

A review of the Cork County Council on-line planning system revealed the following applications associated with the site:

Reg. Ref. 08/8077

Applicant name:	Coleman Brothers Developments Ltd
Description:	Demolition of 2 no. habitable dwellings to include Eastville House, removal of existing grain silos and sheds and other industrial uses currently on site, alteration, extension and change of use of maltings buildings to 23 no. apartments, commercial offices and library , alterations and change of use of Rosehill House incorporating courtyard for use as medical centre, construction of 48 no. dwellings and 87 no. apartments (in three separate blocks), provision of 298 no. car parking spaces to include 138 no. basements spaces, construction of separate building comprising of 2 no. retail units, construction of coffee shop/cafe, provision of biomass district heating system incorporating a central plant room and fuel store, improvement of site lines at junction at Carney's Cross, 16 no. classroom primary school, creche, car parking, recreation and amenity facilities and bring bank/recycling facility and all associated site works to include sales/marketing signs, ESB substation and site development works.
Address:	Upper Road/Carney's Cross, Ballynacorra East, Middleton
Decision Date:	29/06/2009
Decision Type:	Refused
Appeal	Refused (03/12/2010) – ref. PL 04.234288

Refusal Reason:

The proposed development site is located **adjacent to an area of Midleton that is prone to flooding**, and there have been ongoing flooding problems at the nearby Carney's Cross and adjacent areas. The **surface water drainage proposals made in the original planning application would have directed surface water towards existing drainage infrastructure** and the **Board is not satisfied**, notwithstanding the attenuation and drainage improvement measures proposed by the applicant, **that such an approach would not exacerbate existing problems**. An **alternative drainage arrangement involving direct discharge to the estuary via newly laid drainage pipes** was submitted at the request of An Bord Pleanála, having regard to the technical reports made by the planning authority on file. However, it is considered that the feasibility of this alternative approach, in technical terms and in terms of implementation mechanisms and timeframes, has **not been adequately demonstrated**. Having regard to the foregoing, the Board is not satisfied that the proposed drainage measures serving the proposed development are acceptable, would not exacerbate flooding problems in the general area and would not be prejudicial to public health. The proposed development would, therefore, be **premature pending the determination of comprehensive drainage arrangements** for the area and would be contrary to the proper planning and sustainable development of the area.

Board Direction

Note 1: in relation to **traffic concerns** and existing road congestion at the **Lakeview roundabout on the N25**, the Board noted that the applicant had submitted proposals to improve capacity at the roundabout and these proposals appeared to be acceptable to the National Roads Authority and Cork County Council. It was also noted that the **subject development would contribute a relatively small additional volume of overall traffic flow on the roundabout**. The Board considered that subject to appropriate conditions regarding the sequencing of delivery of the relevant road improvements vis-à-vis the subject development, refusal of permission based on prematurity in relation to this issue would not be appropriate.

Inspectors Report

Principle of development	These old industrial sites present challenges and opportunities in relation to re-development but the concept of establishing new uses for the complex is desirable
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	<i>Given the nature of the protected mill buildings an emphasis on converting these buildings to apartment type development is also reasonable.</i>
	<i>... the range of uses and residential mix are satisfactory in particular the residential development proposed in the southern area of the site.</i>
Key Issues	Traffic and Drainage.

ABP Ref. No. 04.23617 / P.A. Ref. No. 08 / 7157.

This related to a third party appeal for a revised / **variation of residential development** from 4 no. 2 storied 3 bedroom dwellings to 4 no. 3 storied 4 bedroom dwellings on Upper Road to the north of Rose Hill House and to the west though not contiguous to the malting house which was **refused** by the Board by reason of its design, visual obtrusion and out of character with the pattern of development in the area.

ABP Ref. No. 04.221854 / P.A. Ref. No. 06 / 9980.

This related to an **appeal against conditions** including special contribution conditions for a residential development at Lake View Castleredmond north of Ballinacurra, which was upheld on appeal in June 2007. It is noted that the development did not require a condition in relation to a contribution to works to upgrade the Lakeview roundabout.

ABP Ref. No. 04.218935 / P.A. Ref. No. 05 / 9120.

An application for development part of the site for the removal of grain mills and stores, construct **130 apartments, 24 houses, commercial and community facilities** and all associated works was **granted** planning permission and a first party appeal subsequently withdrawn.

05/8330 – incomplete application.

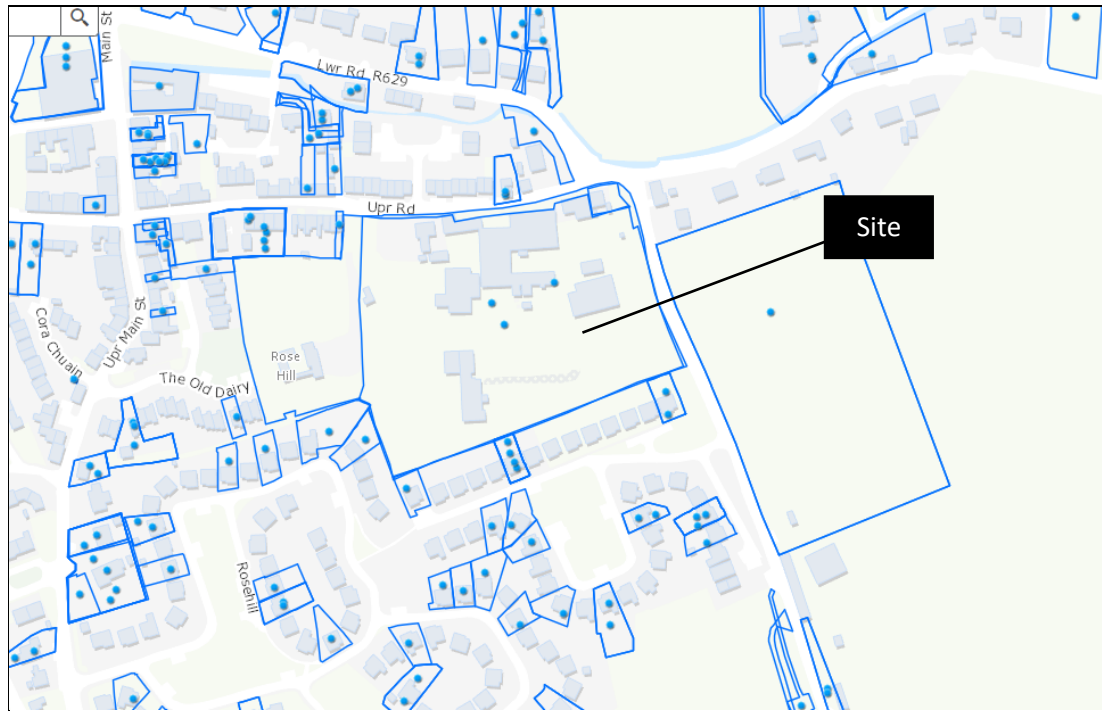


Fig No.18 Extract from Cork Co. Co. planning enquiry system showing planning history for the site.

3.2 Midelton Town

There have been 2 No. LRD applications granted permission in Ballinacurra:

Castleredmond LRD

An Bord Pleanála granted permission on 9th February 2024 to Glenveagh Homes Ltd for 270 residential units, creche, temporary WWTS and all associated works at Castleredmond, Midleton, Co. Cork – Ref. ABP-318403-23. The scheme included 28 apartments and 242 houses ranging from 1 – 3 storeys high. The housing mix involved 28 no. 1 beds, 120 no. 2 beds, 107 no. 3 beds, 15 no. 4 beds. The net residential density was 37.2 units per hectare. Public open space amounted to 16.7% of the site. A temporary wastewater treatment plant is proposed to the north east of the site, this will be in use until such time as the Midleton Waste Water Treatment Plant is upgraded by Uisce Éireann.

Maplewood LRD

An Bord Pleanála granted permission on 14th September 2023 for the construction of 125 no. residential units, 21 no. garden sheds, 1 no. crèche, 2 no. ESB substations, a temporary wastewater treatment system and all associated site works at Maple Woods, Ballynacorra, Ballinacorra, Midleton, Co. Cork - ABP-317290-23. The scheme consisted of 117 houses and 8 no. maisonettes. The housing mix is 8 no. 1 beds, 57 no. 2 beds, 54 no. 3 beds and 6 no. 4 beds. The net residential density is 38.3 units per hectare. Public open space amounted to 12% of the developable area.

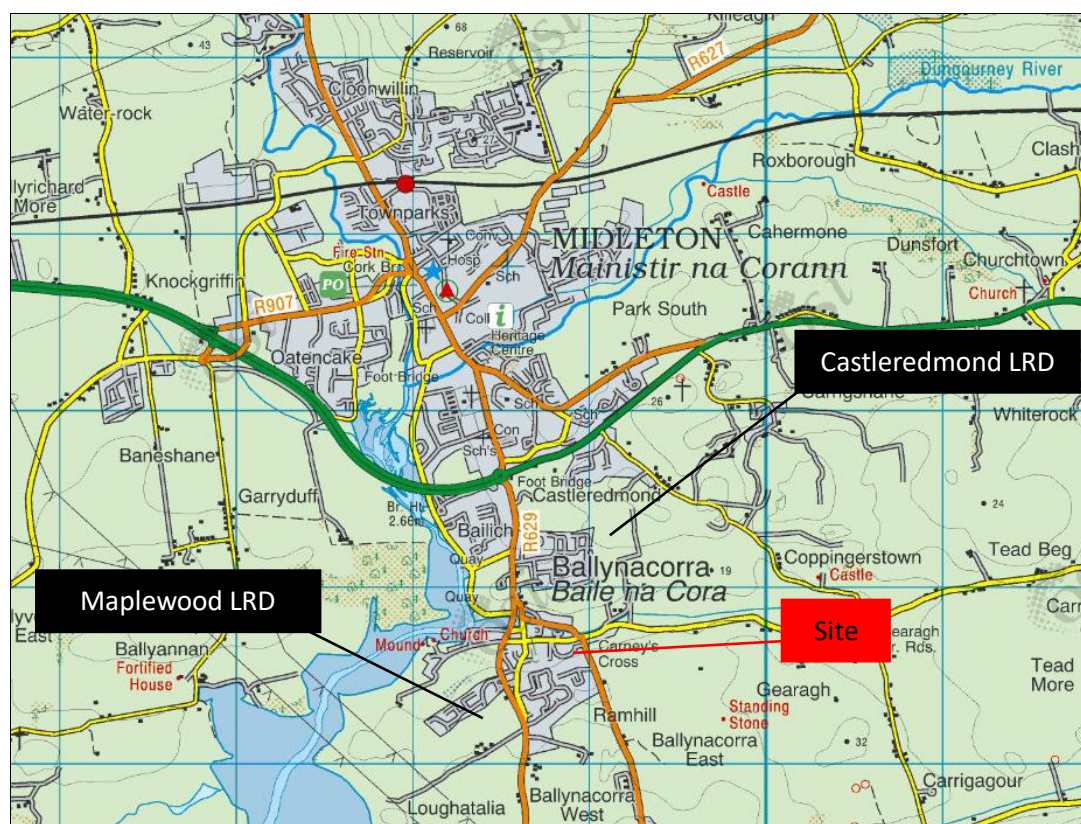


Fig. No.19 Map showing location of recent LRD applications in Ballinacorra, relative to the subject site.

4.0 PROPOSED DEVELOPMENT

4.1 Description

The demolition of 1,165sq.m of structures associated with the former Mill and demolition of 3 no. vacant dwellings, outbuilding associated with Eastville House and an extension to the rear of Rosehill House.

The proposed development will consist of:

The demolition of 1,165sq.m of structures associated with the former Mill and demolition of 3 no. vacant dwellings, outbuilding associated with Eastville House and an extension to the rear of Rosehill House.

The provision of 128 residential units, (103 dwellings and 25 no. apartments) as follows:

Construction of 92 no. new dwelling houses ranging from 2 to 3 storeys in height (comprising of 39 no. 2 bedroom houses, 36 no. 3 bedroom houses and 17 no. 4 bedroom houses),

The conversion/change of use of existing structures to 8 no. dwelling houses (1 no. 3 bedroom dwelling in Rosehill House outbuildings and 3 no. 2 bedroom dwellings and 4 no. 3 bedroom dwellings in the Mill Buildings),

The repair and conservation of Rosehill House to 1 no. 4 bedroom dwelling, and conversion of Eastville House to 1 no. 2 bedroom dwelling and 1 no. 3 bedroom dwelling,

The conversion/change of use of existing mill building structures ranging from 3 to 4 storeys in height, to 25 no. apartments (comprising of 1 no. ground floor Studio and 10 no. 1 bedroom apartments and 14 no. 2 bedroom apartments in existing Mill buildings from first to third floor),

The construction of 1 no. single storey creche, 1 no. single storey café and 1 no. ESB substation and the conversion/change of use of former mill buildings into 2

no. ground floor retail units, 1 no. ground floor commercial office unit and 1 no. ground floor medical centre unit.

Ancillary works are also proposed including provision of roads, footpaths, public open space, communal open space, private open spaces, 214 car park spaces, 114 cycle spaces, EV charging spaces, drainage infrastructure, 2 no. access points (one off Rose Lane and one off Cloyne Road, R629) and all associated site works including play area, landscaping and boundary treatments.

It is also proposed to carry out new car parking arrangements along part of Rose Lane to the north of the site measuring 0.057 hectares (bringing gross site area to 3.687 ha).

Demolition

It is proposed to demolish existing structures including 3 no. existing dwellings and structures associated with the former mill – total floor area of 1,165sq.m.

Refer to the demolition drawings prepared by Fourem Architects for details of same. A preliminary Construction and Environmental Management Plan prepared by MHL Consulting Engineers also addresses how construction and demolition waste will be dealt with. The applicant invites a condition of planning permission for a Resource Waste Management Plan to be submitted to the Planning Authority for written approval prior to commencement of development (when the contractor is appointed).

128 Residential Units

Apartments:

The former Ballinacurra Mill building will be converted into 25 apartments which will form the part V element of the proposed development.

The 25 apartments will consist of 1 no. one bed studio, 10 no. one bed apartments and 14 no. two bed apartments. The apartment block will be part 3 and part 4 storeys high.

Dwellings:

The scheme will provide a total of 103 dwellings.

It is proposed to construct 92 new dwellings measuring 2 – 3 three storeys high.

It is also proposed to convert 11 no existing buildings into dwellings or convert vacant dwellings back into dwellings including:

- 1 no. 4 bedroom dwelling in Rosehill House,
- 1 no. 3 bedroom dwelling in Rosehill outbuildings,
- 1 no. 2 bedroom dwelling and 1 no. 3 bedroom dwelling in Eastville House,
- 3 no. 2 bedroom dwellings and 4 no. 3 bedroom dwellings in the Mill Buildings

Housing Mix

The overall mix of residential units (128) will be:

- 11 no. 1 beds (9%) including 1 no. studio
- 57 no. 2 beds (44%)
- 42 no. 3 beds (33%)
- 18 no. 4 beds (14%)

There are a total of 13 different house types proposed (for new housing) excluding variations in the case of certain house types. This will ensure a varied housing mix within the scheme.

Residential Density

The proposed residential density will be 43 uph⁴ (excluding the non-residential ground floor uses as per the recommendation in Table 1 in Appendix B of the Sustainable and Compact Settlement Guidelines).

⁴ Based on overall net area of 3.63ha less floor area of commercial buildings.

Layout

The proposed development can be divided into two main areas; the town centre zoned lands to the east where the mill buildings are located and the area to the west where Roseville House is located.

The primary focus of the eastern area is the former mill buildings which will be converted into commercial units and apartments. The remainder of the eastern area of the site will consist of new dwellings. The layout of the new dwellings is generally in a perimeter style with dwellings fronting onto the public realm, both externally (public roads) and internally. The public open space for the eastern portion of the site is concentrated in the centre of this area, around the mill buildings.

The primary focus of the western portion of the site is Roseville House. A significant amount of public open space is provided to the north and east (front) of this House to reflect its former curtilage and the mature trees within. The proposed housing in the area of the scheme is at a lower density in order to provide a more arcadian style layout which does not compete with the prominence of Roseville House. The layout of this portion of the scheme has been the subject of much discussion with the Planning Authority in Cork County Council including an on-site visit with council officials and the design team.

Childcare Facility

The proposed childcare facility will be located to the west side of the entrance to the development at the north-west of the site. It will be a single story structure measuring 223sq.m. To the rear there is a dedicated area of open space for children's play area. A set down area for 4 no. cars is provided along with 3 staff car parking spaces and 10 no. cycle spaces.

The facility will cater for c.34 children. It is expected that the vast majority of children will come from the scheme itself, which is likely to generate a demand for c.34 no. childcare places. The facility will also be within close walking

distance of a large residential population nearby. On this basis it is anticipated that cars accessing the facility from outside are likely to be very few.

Creche and Commercial Uses

It is proposed to provide a standalone café and creche building along with commercial uses comprising of medical, retail and office units.

The creche will be located near the access to the proposed development off Rose Lane.

The café and other commercial uses will be centrally located within the scheme where they will form a commercial centre which will be of benefit to the future occupants of the residential units and the wider area.

Breakdown of Floor Areas

Existing buildings: 5,121sq.m (refer to demolition drawing showing same).

Demolition: 1,165 sqm (Gross floor area of all floors to be demolished)

Total Gross Floor Area of All Buildings including proposed and conversion/change of use of existing buildings: 14,664sqm

Gross Floor Area Residential: 13, 811 sqm (including 543sq.m common areas)

Gross Floor Area Mill Complex: 3,475 sqm (change of Use)

The total commercial floorspace of the proposed development amounts to 853sq.m (including 22sq.m substation) . This represents **5.8%** of the total floor area.

Public Open Space

It is proposed to provide public open space amounting to 0.46ha or 12.6% of the total site area. The public open space consists of 3 main areas based on the following hierarchical order:

- Area 1 to the north and east of Rose Hill House
- Area 2 to the south of the mill buildings
- Area 3 to the east of the mill buildings
- Area 4 to the north of the mill buildings

Access to these areas of public open space is convenient for all proposed dwellings within the scheme via pedestrian paths and crossings.

All areas of public open space will be overlooked which will encourage passive surveillance.

Each area will be landscaped as per the details outlined in the landscape plan prepared by Fourem Architects.

Part V

The applicant purchased the site in 2020 – see proof of purchase enclosed with the cover letter submitted with the application.

Cluid Housing Association have engaged with Cork County Council Housing section and agreed in principle to take 25 no. completed apartments as the Part V element of the proposed development. Please refer to the email from Cluid Housing Association contained in the cover letter submitted with the application.

Phasing

Refer to the phasing plan prepared by Fourem Architects which shows how the proposed development will be phased from the south-east to west, but critically will also include works to the Protected Structures in conjunction with the early phasing to ensure this is undertaken in tandem with the new build element.

Taking in Charge

A diagram detailing the areas to be taken in charge is prepared by Fourem Architects – refer to s.1.3 of the Design Statement. The mill buildings and Rosehill House will not be taken in charge and will be operated by Management Companies. The other dwellings will be sold to private individuals who will be responsible for their own dwelling and associated private areas.

Car Parking

A total of **214 no. car park spaces** are proposed on site. 186 no. car parking spaces are for residential use (163 for the dwellings and 24 for the apartments).

Most of the car park spaces are located to the front of the dwellings, but some are located to the rear (to the south and east of the scheme).

Please refer to the diagram prepared by Fourem Architects in the Design Statement which shows the assigned car parking and numbers. This also includes details of EV charging spaces.

Cycle Parking

A total of **114 bicycle parking spaces** are proposed. The dwellings can all store bicycles internally or in outdoor sheds and therefore they are not included in the cycle parking numbers as would be the norm.

The apartments will have 60 no. cycle spaces (all covered) with the creche having 10 spaces. 30 no. visitor cycle parking spaces are also proposed with 14 no. cycle spaces for the commercial units.

Please refer to the diagram prepared by Fourem Architects in the Design Statement which shows the assigned cycle parking and numbers.

Bins

The proposed apartments will have covered communal bin storage. All houses will have rear access for bin storage. Terraced dwellings will have shared

side/rear access points. Refer to the Waste Management diagram in the Architects Design Statement for locations.

Pre-Planning Response

The issues raised at the initial s.247 LRD pre-planning meeting with the Council have been addressed– refer to Section 7.0 below.



Fig No.21 Diagram extracted from Fourem Architects Design Statement showing the site layout with proposed commercial land uses identified.

Please refer to the **Architectural Design Statement** prepared by Fourem Architects which provides more details about the proposal as well as the CGI images prepared by Vinden Visual.



Fig No.22 Aerial view from point north of Rose Lane facing south showing proposed restored and repurposed mill buildings.



Fig No.22a Aerial view from point east of Cloyne Road facing west showing the proposed new residential element to the east of the scheme.

5.0 CONSISTENCY WITH NATIONAL & REGIONAL PLANNING

5.1 Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness, November 2025

This plan considers how we progress homes where they are needed, from our islands to our villages - to our provincial towns and the growth of our cities, and even when the challenges faced in each are often very different. The Plan is built around two pillars: Activating Supply and Supporting People.

Activating Supply is about removing structural barriers to homebuilding — unlocking land, reforming planning, delivering infrastructure and creating conditions for investment. It also involves boosting construction capacity, adopting modern methods of construction and addressing vacancy and dereliction to bring homes back into use.

Supporting People is aimed squarely at making homes accessible and affordable, particularly those who are most at-risk of homelessness or those waiting on our housing lists around the country.

The plan targets the construction of 300,000 homes up to 2030, including 72,000 social homes and 90,000 affordable housing supports. That equates to **75,000 houses per annum from 2026 to 2030.**

*“Building 300,000 new homes requires a sufficient pipeline of available land. Government will take action across a range of areas to ensure suitable zoned land is available for housing development, and to provide a greater level of certainty in relation to the planning process and timelines. **Key actions include zoning more land to support the delivery of 300,000 homes right across the country**”.*

There is no upper limit on housing delivery envisaged over the plan period.

As noted by Ronan Lyons, Professor in Economics, Trinity College in an article in The Currency (dated 18.11.25) responding to this action plan:

The housing deficit, as of late 2025, is about 300,000 homes. The number of new homes needed 2025-2030 is about 300,000. A plan to build 300,000 homes in the next five years cannot claim to solve both.

5.2 National Planning Framework ('NPF') 2040 – Revised

The National Planning Framework (NPF), is the long-term, 20-year strategy for strategic planning and sustainable development of our urban and rural areas to 2040, with the core objectives of securing balanced regional development and a sustainable 'compact growth' approach to the form and pattern of future development.

The revised NPF (April 2025) has increased the annual housing targets to **50,000, doubling previous targets** in order to respond to demographics whereby population growth is rapidly increasing and is estimated to be 6.1 to 6.3 million people by 2040.

These estimates do not take into account existing pent up demand for housing. The Government appointed Housing Commission reported in 2024 that there is a pent up demand for **256,000 houses**.

Relevant National Policy Objectives:

National Policy Objective 7

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact growth and sequential patterns of growth.

National Policy Objective 22

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.

National Policy Objective 42

To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.

National Policy Objective 43

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

National Policy Objective 45

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

It is submitted that the proposed development will accord with the NPF by making more intensive use of a vacant, brownfield site for residential use where higher residential density will be provided in close proximity to public transport. The delivery of 128 dwellings will make a significant contribution to housing supply in the town of Midleton.

5.3 Sustainable and Compact Settlements Guidelines for Planning Authorities, 2024 ('SCS Guidelines')

On the 15th of January 2024, the Minister published the 'Sustainable and Compact Settlements Guidelines for Planning Authorities', which replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009.

The key relevant extracts from the Guidelines are as follows:

*In order to achieve compact growth, we will need to support more intensive use of existing buildings and properties, including the re-use of existing buildings that are vacant and **more intensive use of previously developed land and infill sites**, in addition to the development of sites in locations served by existing facilities and public transport.*

*To achieve compact growth, it will also be necessary to **increase the scale of new buildings in all parts of our cities and towns**, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges.*

Higher densities and taller buildings that exceed the traditional scale will be encouraged in the most central and accessible parts of our cities and large towns, **particularly in large regeneration areas**, and subject to the protection of historic fabric, character, amenity, natural heritage, biodiversity and environmental quality.

... the planning authority is required to have regard to the policies and objectives of the Guidelines and to apply the specific planning policy requirements (SPPRs).

The proposed development will make more intensive use of previously developed land and therefore will contribute to compact growth.

Density

The population of Middleton is 13,906.

s.3.3.3 deals with Key Towns and Large Towns (5,000+ population)

The key priorities for the growth of Key Towns and Large Towns in order of priority are to:

... (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, **brownfield and infill development**,

Table 3.5 - Areas and Density Ranges Key Towns and Large Towns (5,000+ population) - Key Town / Large Town.

The subject site is primarily zoned Town Centre and therefore 'Centre and Urban Neighbourhood' is considered to be relevant:

The **centre comprises the town centre** and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range **40 dph-100 dph (net)** shall generally be applied in the centres and urban neighbourhoods.

The proposed residential density is **43 units per hectare** (excluding non-residential ground floor areas) which is within this density range.

The reason why a higher density cannot be achieved on this site is that density on this site is significantly influenced by the Protected Structures on the site and particularly Rose Hill House at the west side, where there is a need to respect the character and setting of this Protected Structure, including its curtilage. This has resulted in keeping new buildings away from the structure itself and retaining the existing mature trees and open space.

The density in this western portion of the scheme is 12.5 units/ha which influences the overall density. The density for the larger eastern portion is notably higher at 41 units/ha (50 units/ha if non-residential uses are accounted for).

In this regard we note that the Guidelines accept that the standard density levels cannot always apply. Section 3.4 'Refining Density' states that:-

*"The application of the density ranges in the preparation of statutory development plans and in the consideration of individual planning applications will be subject to local determination by the planning authority, or by An Bord Pleanála in the case of an appeal or direct application. The density ranges set out in Section 3.3 should be **considered and refined**, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and **considerations of character**, amenity and the natural environment (Figure 3.3 refers)".*

Specific planning policy requirements

SPPR 1 - Separation Distances

It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level.

Fourem Architects confirm that all dwellings with opposing windows have separation distances exceeding 16m. Dwellings that are proposed within 16m of each other do not have opposing windows - the design is thought through so that all habitable rooms face in different directions when buildings are closer than 16m. For example, some house designs only have habitable rooms on first floor facing the street while all services face the rear to achieve closer distances.

SPPR 2 - Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq.m
- 2 bed house 30 sq.m
- 3 bed house 40 sq.m
- 4 bed + house 50 sq.m

All minimums are exceeded – refer to the HQA prepared by Fourem Architects – apart from 1 house proposed in the Cereal Station - 3 bed house which has a garden area of 38sqm, slightly under the 40sqm requirement. However this is an existing building and it has a notably large public open space directly in front of the house.

Specific planning policy requirements

SPPR 3 - Car Parking:

In areas of high accessibility, car-parking provision should be minimised, substantially reduced or wholly eliminated, while in areas of medium accessibility, car-parking provision should be substantially reduced.

We consider that the site is located in an area of medium accessibility on the basis of a bus stop being the only public transport in the vicinity, with the train station in Midleton being located approximately 2.7km from the site.

The proposed car parking for both the residential and commercial elements of the scheme amounts to 214 spaces which is below maximum requirements outlined in the Cork County Development Plan 2022-28 (CCDP 2022-28).

- SPPR 4 - Cycle Parking and Storage:

In the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied (with visitor parking to be also provided).

The only residential units that do not have ground level open space or have smaller terraces are the proposed apartments – 25 in total. The apartments have a total of 39 bedrooms. This gives rise to a minimum requirement for 39 cycle spaces along with additional (non-specified) visitor spaces.

A total of 60 cycle spaces are provided for the apartments which is therefore compliant with the guidelines.

Open Space

Policy and Objective 5.1 – Public Open Space provides that new residential development provide a minimum of 10% and not more than 15% of the net site area.

It is noted that the definition of Public Open Space states that “*it can include areas used for Nature-based Urban Drainage and other attenuation areas where they form part of an integrated open space network*”

The proposed public open space amounts to 12.6% of the total site area and is compliant.

Supplemental Information (Appendix C)

The relevant reports have been addressed in this application where the threshold is met.

Urban Design (Appendix D)

The Design Checklist - Key Indicators of Quality Urban Design and Placemaking – are addressed in the Architect's Design Statement.

5.4 Childcare Facilities Guidelines for Planning Authorities June, 2001

Section 3.3.1 notes that in relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate depending on established childcare facilities and the number of one-bed units being proposed.

The proposed development involves 128 dwellings and therefore meets the threshold whereby a childcare facility is required under the guidelines.

$$128/75 = 1.7$$

$$1.7 \times 20 = 34 \text{ childcare spaces required.}$$

The proposed childcare facility will cater for 34 childcare spaces and is therefore compliant. It is designed as a purpose-built facility in accordance with childcare regulations, including a dedicated area of outdoor open space.

5.5 Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (2025)

The Minister's Introduction states

*swift and decisive action is needed to ensure we deliver homes needed for people, right across the country **Apartments are an essential part of our housing infrastructure, and I want to ensure that we see more of them built in our urban areas, where they are needed most.***

Compliance with Specific Planning Policy Requirements

... where SPPRs are stated in this document, they take precedence over any conflicting policies and objectives of statutory plans. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these Guidelines.

Specific Planning Policy Requirement 1

- (A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.
- (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.

The absence of any specific mix for apartments is noted. For clarity the proposed apartment mix will be: 11 no. 1 beds (44%) and 14 no. 2 beds (56%).

Specific Planning Policy Requirement 2

The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- Studio apartment (1 person) 32sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2 bedroom apartment (3 persons) 63 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (4 persons) 76 sq. m
- 3-bedroom apartment (5 persons) 90 sq.m

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.

Compliance with minimum floor areas, is addressed in the HQA prepared by Fourem Architects.

Specific Planning Policy Requirement 3

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.
- (ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

Fourem Architects have confirmed that all but 2 no. apartments are dual aspect. These two apartments represent 8% of the total no. apartments which is notably low.

Specific Planning Policy Requirement 4

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

Fourem Architects have confirmed that the proposed apartments at ground floor level have ceiling height of 2.7m

Specific Planning Policy Requirement 5

There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.

Noted.

Specific Planning Policy Requirement 6

The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.

Minimum recommended floor areas for communal amenity space, where provided

Studio	4 sq.m
One bedrooms	5 sq.m
Two bedrooms (3 person)	6 sq.m
Two bedrooms (4 person)	7 sq.m
Three bedrooms (4 persons)	7 sq.m
Three bedrooms (5 persons)	9 sq.m

The minimum communal open space requirement is as follows:

One-bedroom units: $11 \times 5 \text{ m}^2 = 55\text{m}^2$

Two-bedroom units (3 person): $13 \times 6\text{m}^2 = 78\text{m}^2$

Two-bedroom units (4 person): $1 \times 7\text{m}^2 = 7\text{m}^2$

Total Required: 140m^2

A total of 260sq.m communal open space is provided which is compliant. Refer to the Architectural Design Statement (Usable Open Spaces) for the location of same.

Car and Cycle Parking

Requirements for car and cycle parking are as per SPPR 3 and 4 in the Compact Settlement Guidelines – which are both addressed above.

Minimum Floor Areas and Standards

Compliance with minimum floor areas, room sizes and storage areas is addressed in the HQA prepared by Fourem Architects.

Minimum recommended floor areas for private amenity space, where provided

Studio	4 sq.m
One bedroom	5 sq.m
Two bedrooms (3 person)	6 sq.m
Two bedrooms (4 person)	7 sq.m
Three bedrooms (4 persons)	7 sq.m
Three bedrooms (5 persons)	9 sq.m

Refer to the HQA prepared by Fourem Architects for details of compliance. All minimums are exceeded.

Building Lifecycle Report

The requirement for a **building lifecycle report** outlining the management of the apartments has been met – please refer to the Building Lifecycle Report prepared by Fourem Architects.

5.6 Urban Development and Building Heights Guidelines for Planning Authorities August 2018

The guidelines note that: -

Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is:-

“significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas” – emphasis added.

The proposed development will serve to deliver a more compact urban form within Ballinacurra by providing a mix of 1, 2 and 3 storey buildings along with a part 3 and part 4 storey apartment block. The single storey buildings are all commercial.

Please refer to the diagram entitled Building Heights (s.3.2) in the Architectural Design Statement prepared by Fourem Architects which outlines the different building heights.

5.7 The Regional Spatial & Economic Strategy for the Southern Region (RSES), 2020

The Regional Spatial & Economic Strategy (RSES) for the Southern Region sets out a 12-year strategic development framework for the Southern Region.

It is a principle of the RSES to inform the integration of land use and transport planning by *“ensuring that future developments are planned and designed to maximise their accessibility by public transport, walking and cycling”*.

Regional Policy Objective RPO 10 sets out that the RSES seeks to achieve compact growth by **prioritising housing and employment development** in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.

Section 3.4 of the RSES states that sustainable regeneration and growth (particularly compact growth) will be achieved through effective sustainable transport and spatial land use planning. It emphasises that the distribution of growth must follow a spatial hierarchy that underpins delivery of the CMATS.

The RSES outlines the transport priorities for the Cork Metropolitan Area which includes the development of new commuter rail stations in Metropolitan Cork (see the CMATS for details), including **upgrading existing and new stations on a network serving** Blarney/Stoneview (park-and-ride station), Monard, Blackpool/Kilbarry, Kent Station, Tivoli Docks, Dunkettle (park-and-ride station), Little Island, Glounthaune, Carrigtwohill West, Carrigtwohill, Water Rock, **Midleton**, Fota, Carrogaloe, Ballynoe, Rushbrooke and Cobh.

In relation to foul drainage, the RSES outlines the need for a new Wastewater pumping station and rising main from Midleton to Carrigtwohill and from Killumney to Ballincollig.

Section 7.3 of the RSES outlines the **Strategic Residential and Regeneration Areas including Middleton.**

Cork Metropolitan Area Transport Strategy (CMATS) 2040

The Cork Metropolitan Area Transport Strategy (CMATS) 2040 was published in February 2020 and was included as an objective in Cork MASP Policy (Objective 7) of the RSES and identified as one of the Guiding Principles of the Cork MASP. CMATS represents a coordinated land use and transport strategy for the Cork Metropolitan Area. It sets out a framework for the planning and delivery of transport infrastructure and services to support the Cork Metropolitan Area development in the period up to 2040.

The proposed LRT system does not extend to the subject site.

Walking

The proposal has been designed to prioritise the safe movement of pedestrians within the site and to the wider area.

Cycle

The proposed development is located close to established cycle infrastructure – refer to the TTA prepared by MHL Consulting Engineers for details of same. As a result, provision for bicycle parking spaces is provided in the scheme to support the use of active and sustainable travel.

Bus

The subject site is located c.2km south of Middleton Town Centre. The site is therefore within close proximity of the proposed high frequency bus route between Middleton and Cork City Centre.

6.0 CONSISTENCY WITH CORK COUNTY DEVELOPMENT PLAN 2022-28 ('CCDP')

6.1 Vision

*"The Vision is to provide for the development of County Cork as an attractive, competitive and sustainable place to **live**, visit and **do business**, where the quality of its economy, natural and built environment, culture and the strength and viability of its rural and urban communities are to the highest standards".*

The proposed development will provide a high-quality scheme which will facilitate both housing and employment opportunities.

Chapter 2: Core Strategy

Compact Growth

*The Plan aims to support and implement the underlying theme of the NPF regarding providing for more consolidated urban cores at the heart of our settlements ... It is clear that the **introduction of significant infill/brownfield targets for residential development** within existing settlement 'footprints' in the NPF **reflects a greater desire** by Government as well as many key stakeholders, **to move away from an excessive reliance on greenfield development** to meet our development needs and encourage more city, town and village centre renewal (s.2.6).*

The site is within Midleton, which is located within the **Metropolitan Strategic Planning Area** and is classified as a **Large Town (8,000-10,000)**.

The Core Strategy identifies that Midleton has a population target of 19,423 up to 2028 representing a growth of 6,927 over the 2016 census figure. **An additional 2,647 housing units are required to meet this target.**

Objective CS 2-3 states the following in relation to the Cork Metropolitan Strategic Planning Area which includes Midleton:

*Within the Cork Metropolitan Area, and most notably along the existing rail corridor, plan for development to provide the homes and jobs that are necessary to serve the long term planned population prioritised in the following locations, **Midleton**, Carrigtwohill, Cobh and Little Island.*

In the CDP, Midleton is identified as a **Metropolitan Town**.

Objective CS 2-7 of the Cork County Development Plan states the following as the strategic aim for Metropolitan Towns:

Growth in population and employment so that the Cork Metropolitan Area (CMA) can compete effectively for investment and jobs in line with the key enablers identified in the RSES for the Southern Region and the Cork MASP.

Consolidate employment at existing employment locations with improved supporting infrastructure, and in particular public transport improvements including those identified in the CMATS (2020). Continue with the strategic rebalancing of the city and county through the development of the UEAs along the East Cork Corridor and the Monard SDZ.

Critical population growth, service and employment centres within the Cork Metropolitan Area, providing high levels of community facilities and amenities with infrastructure capacity high quality and integrated public transport connections **should be the location of choice** for most people especially those with an urban employment focus.

The proposed development will deliver housing and some local employment within close proximity to public transport in line with this strategic aim.

Chapter 3: Settlements & Placemaking

Objective PL 3-3: Delivering Quality and Inclusive Places

In assessing future development proposals the Plan the Plan will implement and promote a series of aims outlined in the Guidelines on Sustainable Residential Development in Urban Areas and accompanying Urban Design Manual and the Design Standards for New Apartments.

The former has now been replaced by the Compact Settlement Guidelines 2024. Compliance with these new guidelines and those for apartments are addressed in this statement and the Design Statement prepared by Fourem Architects.

Table 3.1: Principles of Placemaking

The 7 no. principles outlined are addressed in the Design Statement prepared by Fourem Architects.

County Development Plan Objective

PL 3-1: Building Design, Movement and Quality of the Public Realm

Support measures to improve building design quality, accessibility and movement including investment in quality public realm across the settlement network of the County linked to the following design criteria:

a. To achieve/ reinforce a better sense of place and distinctiveness strengthening local character.

The proposed reuse of the existing historic buildings within the site will ensure a sense of place and distinctiveness relative to any other housing development in the town.

b. Create a design that is sensitive to the history and heritage context of a town / village setting and provides for protection of heritage features and non structural heritage that are important and intrinsic part of the distinctiveness and character of the settlement such as historic boundaries (stone and earthen), pillars and gates, street furnishing, paving and kerbing, trees, hedgerows;

The two key Protected Structures associated with the site, namely Rose Hill House and The Maltings will be preserved and restored (where possible) and a new sustainable use is provided for each.

c. Ground floor buildings within the town centre should aim to have a 4m floor to ceiling height, where possible, to facilitate active ground floor uses.

This requirement relates to new buildings rather than refurbishment schemes. The proposed floor to ceiling height of the ground floors of the commercial units range between 3.8m and 4.8m

d. The use of awnings should be utilized in a manner that respects and enhances the historic town centre environment and adds to the town centre experience.

N/A

e. New buildings should provide for high quality, local material choice and the design shall draw on the local architectural language of place and reinterpret these in a contemporary manner.

Refer to the Design Statement prepared by Fourem Architects which outlines the rationale behind the design approach.

f. Promote enhanced and increased public realm opportunities including a shared use of spaces, for outdoor experiences, with a priority on pedestrian usage.

A central plaza (hard landscaping) will be provided within the centre of the scheme which will act as a focal point and will place a priority on pedestrian usage.

g. Provide multi-functional spaces suitable for all age cohorts in the community and capable of accommodating cultural events.

The central plaza has the potential to be used by future occupants of the houses and commercial units for cultural events.

h. Develop and strengthen the use of the green and blue infrastructure in a town / village setting including the retention and enhancement of existing trees and

landscape features, the use of SUDs and permeable paving to achieve climate adaptable places.

The proposed landscape plan seeks to keep the limited existing trees on site (which will be protected during the construction phase), provide SuDs features and include permeable paving.

i. Achieve inclusive public realm working from the centre of a town / village setting which minimizes clutter and maximises opportunities for active mobility.

N/A

j. Achieve permeability and connectivity in town centre / village locations which contributes to the 10 Minute Town Concept and Sustainable Neighbourhood Infrastructure. The loss of existing laneways will normally not be permitted.

The site is located c.200m from Ballinacurra village and c.2km from Middleton town centre with established pedestrian and cycleway connections to same which will promote sustainable development.

The commercial element of the proposed development will create its own focal point on the town centre zoned lands.

k. Delivers legible routes and urban way finding in the larger towns.

N/A

l. Ensure universal design standards are achievable.

Refer to the Design Statement prepared by Fourém Architects which addressed universal design.

m. Ensure that the aged community and the needs of all ages are facilitated, e.g., through the provision of seating areas and public toilet facilities.

Seating areas are provided in the Proposed Landscape & Roof Plan drawing. Toilet facilities are provided in the café.

n. Consider the impacts, positive and negative, of lighting within the public realm which performs an important safety function and can be an aid to the legibility and distinctiveness of a place. Lighting should be designed to minimise negative effects on wildlife. See also Chapter 15 Biodiversity and Environment including paragraph 15.11.3 and Objectives BE 15-13(d) and (e).

The outdoor lighting plan prepared MHL Consulting Engineers seeks to enhance lighting of the public realm to maximise safety.

The proposed outdoor lighting plan has been reviewed and approved by the project ecologist.

o. Encourage and facilitate the creation and use of public realm and outdoor spaces for outdoor dining in line with Fáilte Ireland's new Outdoor Dining Enhancement Investment Scheme.

The proposed new cafe has the potential for future outdoor seating.

County Development Plan Objective

PL 3-2: Encouraging Sustainable and Resilient Places

As part of the Council's commitment to deliver compact growth and resilient places, the Plan supports

a. The use of the upper floors of the existing town centre building stock for appropriate uses, including Living Over The Shop. The separate access to the upper floors should normally be retained;

N/A

b. The development of brownfield, infill and under-utilised lands within the built envelope of the existing settlement network;

The proposed development represents an under-utilised, brownfield site within the built envelope.

c. Addressing vacancy within the existing building stock;

The proposed development will address vacancy within established buildings and bring back life to same.

d. The preparation of additional guidance for priority town centre sites to aid land activation over the Plan period;

N/A

e. The establishment of a database of brownfield, opportunity and regeneration-sites in order to manage and coordinate active land management priorities across multiple stakeholders on an ongoing basis.

N/A

f. Supports the re-use and revitalisation of brownfield sites and heritage buildings in both urban and rural areas in the County.

The proposed development represents re-use and revitalisation of a brownfield sites and heritage buildings in an urban area.

County Development Plan Objective

PL 3-3: Delivering Quality and Inclusive Places

In assessing future development proposals the Plan will implement and promote a series of aims outlined in the Guidelines on Sustainable Residential Development in Urban Areas and accompanying Urban Design Manual and the Design Standards for New Apartments, which seek to create high quality inclusive places including:

a. To achieve/ reinforce a better sense of place and distinctiveness therefore, strengthening local character;

The proposed reuse of the existing historic buildings within the site will ensure a sense of place and distinctiveness relative to any other housing development in the town.

b. Prioritise walking, cycling and public transport, and minimise the need to use cars;

The proposed development has been designed in a manner that provides pedestrian and cycle infrastructure which connects into established pedestrian and cycle infrastructure. The site is c.270m away from the closest bus stop.

c. Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;

It is submitted that the proposed development will deliver a high level of amenity with multiple soft and hardscapes which have high quality landscaping.

In terms of safety the buildings are designed to front onto the public realm and ensure a high level of passive surveillance.

Having regard to convenience all dwellings are within close walking distance of the proposed commercial area within the scheme.

d. Provide a good range of community and support facilities, where and when they are needed;

The proposed development will provide a new creche facility to cater for children within the development. It will also include a new standalone café which will be for use by the future residents and wider residents in the area and will hopefully help foster a sense of community and integration between the new and established communities.

e. Present an attractive, well maintained appearance, with a distinct sense of place and a quality public realm;

It is submitted that the proposed development will have a distinct sense of place and a high quality realm by making use of the existing built heritage on the site.

f. Easy to access and navigate through the delivery of a clear urban structure including landmarks and vistas;

Refer to the drawing entitled Proposed Site Plan, prepared by Fourem Architects, which shows the urban structure along with the Taking in Charge Diagram which also demonstrates the urban form.

g. Promote the efficient use of land and energy and minimise greenhouse gas emissions;

It is submitted that the proposed development represents an efficient use of land. Currently the site is vacant and contains no active uses. The delivery of a large-scale residential development along with creche and commercial uses will clearly represent a more efficient use of this site.

In relation to energy efficiency refer to section 2.3 Homes – Architectural Design of the design statement prepared by Fourem Architects.

h. Provide a mix of land uses (where relevant) to minimise transport demand;

A mix of residential, community and commercial uses are provided within the scheme.

i. Promote social integration and provide accommodation for a diverse range of household types and age groups; and

The proposed dwellings are designed to cater for families, single persons and older persons.

j. Enhance and protect the built and natural heritage.

A concerted effort is made to protect the existing built structures on the site (Protected Structures) and enhance same by integrating it into the proposed new development. The existing mature trees specimens on the site have been retained where possible and also integrated into the scheme.

Table 3.2 Placemaking Design Standards Checklist

The items outlined in this table are addressed in this statement and the Design Statement prepared by Fourem Architects.

Chapter 4: Housing

County Development Plan Objective

HOU 4-2: Reserved Land for Social and Affordable Housing

*Lands zoned for residential / housing or lands zoned for a mixture of residential / housing and other uses, including all lands identified in this Plan will require a **mandatory 20% of which at least half must be for social housing purposes and the balance can be applied to affordable and/or cost rental housing** purposes in accordance with the principles, policies and programmes for action set out in the Joint Housing Needs Demand Assessment and Joint Housing Strategy.*

The proposed 25 no. apartment units will be constructed and handed over to the Cluid Housing Association. Please refer to the email appended to the cover letter which notes that this has been discussed and agreed in principle with **Mr. Richard Keating** of CCC Housing Department in advance of the application (December 2025). We invite a condition of planning permission to agree full Part V details of this arrangement with the Council prior to commencement of development on site.

County Development Plan Objective

HOU 4-3: Housing for Older People

- a) Encourage the provision of housing suitable for older people in all residential schemes of 10 units or more.*
- b) Support the delivery of housing suitable for older people on infill, opportunity and regeneration-sites within town and village centres. See also Chapter 6 Social and Community- Section 6.6 Planning for Ageing.*

The scheme includes 11 no.1 beds and 57 no.2 beds which would be suitable as housing for older people looking to downsize (rightsized). Note that lifts are provided in the apartments.

County Development Plan Objective

HOU 4-6: Housing Mix

- a) Secure the development of a mix of house types and sizes throughout the County as a whole to meet the needs of the likely future population across all age groups in accordance with the guidance set out in the Joint Housing Strategy and the Guidelines on Sustainable Residential Development in Urban Areas.*
- b) Require the submission of a Statement of Housing Mix with all applications for multi-unit residential development in order to facilitate the proper evaluation of the proposal relative to this objective. The Statement of Housing Mix should include proposals for the provision of suitable housing for older people and the disabled in the area.*

Housing Mix Statement

Aim

A mix of house types and sizes to meet the needs of the likely future population across all age groups.

Demography

The 2022 Census recorded an average household size in Ireland of 2.74, a small decrease compared with the 2016 average, which stood at 2.75, but reflecting a trend in smaller houses in Ireland. The likelihood why the size decrease was minimal is likely down to the fact that many younger persons are living with their parents as they cannot afford to buy a house or apartment.

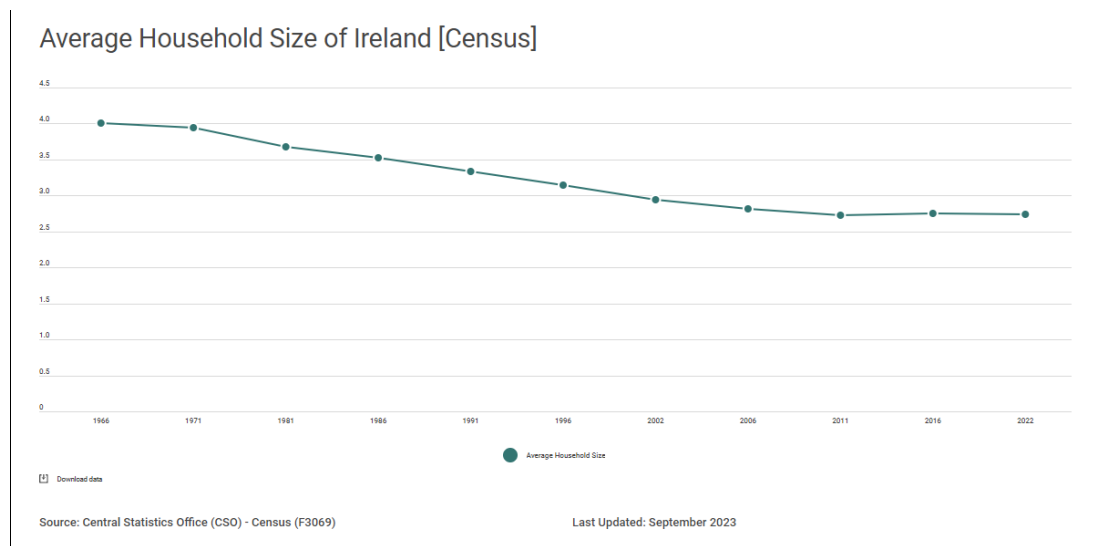


Fig No.24 Average household size in Ireland (The Housing Agency).

The average household size in Cork in April 2022 was 2.72 people which is slightly lower than the national average.

The National Planning Framework 2040 states under 'Changing Family Size' that **"Currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040"**.

Sustainable Urban Housing:

Design Standards for New Apartments; Guidelines for Planning Authorities July 2023 (since replaced by 2025 guidelines) notes that:

*"The 2016 Census indicates that **1-2 person households now comprise a majority of households and this trend is set continue**, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock" (s.2.7) and,*

*"Analysis of urban housing need points to the fact that into the future, **a majority of households will comprise 1-2 persons and approximately half of the remainder will be three person households**. While it is recognised that it will be necessary to provide for a range of incomes, it is critical to accommodate the needs of increasingly more diverse household types in the context of a growing and ageing population". (s.2.8)*

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024 states that:

*"With significant population growth forecast, and changing demographics that will see a **more diverse range of households**, it is Government policy to support medium density 'own door' housing models in Ireland, alongside traditional housing and apartment developments".*

The Cork County Development Plan 2022-28, states under s.4.7 'Housing Mix':

*4.7.1 The impact of population growth, social changes including more people living alone or in **smaller households** and an ageing population with specific housing needs means that **the mix of house types and sizes required needs to become more diverse**. Therefore, it has never been more important to improve the range of choice available throughout the County as a whole.*

*4.7.3 Housing variety and mix will be assessed as a material consideration when considering planning applications for multiunit residential development. A **Statement of Housing Mix** should detail the proposed housing mix including specific provision for special needs groups such as older people or disabled and why it is considered appropriate, having regard to the types of issues outlined in the paragraph above.*

The proposed housing mix for the overall scheme for 128 residential units is 11 no. 1 beds, 57 no. 2 beds, 42 no. 3 beds and 18 no. 4 beds.

This equates to 53% smaller units (1 and 2 beds) and 47% larger units (3 and 4 beds).

This mix is considered to be an appropriate response to the need to reflect a substantial portion of smaller houses in the scheme in response to demographic trends. The larger proportion of 2 beds reflects the fact that most persons living on their own want the benefit of an additional room for visitors or a carer.

The overall mix is broken down into dwellings and apartments as follows:

Dwellings (103 no.)

43 no. 2 beds (41%), 42 no. 3 beds (41%) & 18 no. 4 beds (18%).

Apartments (25 no.)

11 no. 1 beds (44%) and 14 no. 2 beds (56%)

Special Needs Groups (Older persons/disabled persons)

It is submitted that the proposed 2 bed units are appropriate for older persons and allow an additional room for visitors or a carer. They provide an attractive opportunity for older persons in the area to downsize and remain in their community.

In relation to disabled persons we note that all dwellings have been designed in accordance with universal design standards.

Comparisons with Approved LRD Schemes in Ballinacurra:

Castleredmond LRD

Housing mix involved 28 no. 1 beds, 120 no. 2 beds, 107 no. 3 beds, 15 no. 4 beds.

This equates to 54% smaller units and 46% larger units.

Maplewood LRD

The housing mix is 8 no. 1 beds, 57 no. 2 beds, 54 no. 3 beds and 6 no. 4 beds.

This equates to 52% smaller units and 48% larger units.

Density

4.8.7 In County Cork there has been important public investment in transport infrastructure particularly the delivery of the Cork Suburban Rail Network, which currently links Cork with the Metropolitan Towns of Cobh, Carrigtwohill and **Middleton**, and, in future, it is intended to serve the new town of Monard. The Cork Metropolitan Area Transport Strategy (CMATS) sets out a series of strategic transport enablers to accommodate the uplift in the Cork Metropolitan Area's population to 2040 and facilitate a greater modal shift to sustainable travel modes. Within the County Metropolitan Area this will mean higher frequency inter-urban rail services of 10 mins for Cobh, Carrigtwohill, **Middleton**, Little Island, Glounthaune and in future it is intended to serve the new town of Monard ... The **Plan will support increased densities in appropriate locations** as identified by the Guidelines to facilitate the Council's commitment **to integrated land-use planning and the greater efficiency of land use**

County Development Plan Objective

HOU 4-7: Housing Density on Residentially Zoned Land

Town Centre: Min net density of 50/hectare. 10% open space.

Medium A: Suburban/greenfield lands of larger settlements with a population. 5,000. Min.35/hectare.

The subject site traverses both town centre and Medium A locations. A concerted effort has been made to provide increased residential density on the site but there are complexities associated with this site in respect of the Protected Structures and a building on the NIAH. The density on the east side of the site in particular has had to be constrained in order to respect the character and setting of Rose Hill House. The proposed net density is **43 units/ha** is considered to be an appropriate response in this regard.

Brownfield Sites and Regeneration

4.9.10 Within the settlement network of the County there are opportunities to better utilise some brownfield/existing built footprint sites so that they can provide a higher density of development and a greater mix of uses to contribute to the compact growth of the settlement. In some instances, this may also include the provision of higher building heights than had previously prevailed on-site in order to promote a more efficient use of available, accessible land and more focused and efficient investment in infrastructure.

The subject site is brownfield in nature and the proposed development makes use of existing structures on the site in the former mill complex which are capable of being restored.

County Development Plan Objective
HOU 4-8: Building Height and Amenity

Support the provision of increased building height and densities in appropriate locations within the County, subject to the avoidance of undue impacts on the existing residential amenities. In mixed use schemes, proposals will include details of the sequencing of uses to enable the activation of supporting services. **New development greater than 4 storeys will be required to address the development management criteria, as set out in paragraph 3.2 of the Urban Development and Building Heights Guidelines (2018).**

The proposed development will be a maximum of 4 storeys high – with the 4 storey element relying on existing structures. Compliance with the development management criteria in s.3.2 of the Urban Development Building Height Guidelines (2018) is therefore not required.

Chapter 6: Social & Community

SC 6-1: Social and Community Infrastructure Provision

a) Support the provision of social and community facilities which meet the current and future needs of the entire population, and which should grow in tandem with development in communities.

b) Secure lands for social and community facilities and encourage the provision of facilities suitable for intergenerational activities, which are accessible to all members of the community, through initiatives in partnership with community groups and sporting organisations. Encourage the provision of community facilities, in accordance with the liveable town concept, in order to enhance easy of access to social and community facilities and services to all members within the community.

The proposed development incorporates approximately 0.46 hectares or 12.6% of useable active open space within the developable area.

The proposed development includes a c.34 child/223sq.m creche in line with the requirements of the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006.

These facilities will be available to the entire community, both existing and future.

SC 6-3: Multi-Use Community Facilities

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

The proposed development provides a variety of multifunctional breakout areas for all age groups within the public realm which are well connected and benefit from passive surveillance.

SC 6-4: Childcare Facilities

Support and facilitate the sustainable provision of childcare facilities in appropriate locations and seek their provision concurrent with development, having regard to population targets for the area and in accordance with the Childcare Facilities Guidelines for Local Authorities 2001 and regard to the Universal Design Guidelines for Early Learning and Care Centres 2019.

The proposed development includes a c.34 child/223sq.m creche in line with the requirements of the Guidelines on Childcare Facilities and the Childcare (Pre-School Services) Regulations 2006.

SC 6-5: Educational Facilities

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

The proposed development includes a dedicated purpose-built childcare facility. There is no objective in the CCDP identifying the site for a primary or post primary school.

SC 6-6: Provision of Educational Facilities in Large Residential Developments

a) Provide new educational facilities in accordance with the guidance set out in Guidelines on Sustainable Residential Development in Urban Areas.

b) Recognise that new residential communities can generate demand for additional school places and that it is vital to the process of supporting sustainable communities, that the necessary increased capacity in school facilities, either in the form of new schools, or the expansion of existing schools, is provided.

c) Work closely with the Department of Education & Skills to identify in the Local Area Plans, existing and future educational requirements, identify and reserve

suitable sites for educational purposes and acquire, as appropriate and with the approval of the Department of Education & Science, sites for future school provision in order to ensure that the necessary increased capacity in school provision is provided in a timely manner and as an integral part of the development of an area.

d) Facilitate the development of primary, post primary, third level, outreach, research, adult and further educational facilities to meet the needs of the County.

e) Encourage, support and develop opportunities to open up new and existing educational facilities to wider community use, subject to normal proper planning and sustainable development considerations.

f) Require that proposed new large scale residential developments, either as part of an individual development or a collective group of developments include an assessment of the demand for school places likely to be generated by the development and proposals to address any identified increase in demand which may arise.

A School Demand Report is submitted with this application and demonstrates capacity to cater for the proposed development.

SC 6-9 Cork an Age Friendly County

Support the implementation of the Cork Age Friendly County Programme and the Age Friendly Principles and Guidelines for the Planning Authority 2021 and recognise the demographic challenges that face the county and ensure the provision of suitable facilities and services in the future for all ages and abilities.

SC 6-10 Services and Infrastructure For Older Persons Strategy

Support the implementation of the Services and Infrastructure for Older Persons Strategy 2014 as a step towards planning for ageing

SC 6-11

Accommodation for Older Persons

Support the provision of residential care, assisted living, group/community housing and other forms of accommodation for older persons.

SC 6-12 Age Friendly Policies

To implement Age Friendly policies in the refurbishment/adaptation of existing housing stock, and to consider the needs of the older generation in terms of design and lifelong living.

Care has been taken in the design of the proposed development to address each Principle of Universal Design. All dwellings are designed in accordance with the Universal Design Statement and references the Technical Guidance Documents Part M regarding Access and Use.

53% of the proposed new dwelling units are smaller sized units i.e. one and two bed units and this will encourage older persons living in the area to downsize to a smaller dwelling with less maintenance and allow these persons to remain living in their local community. This will also have the knock-on effect of freeing up larger dwellings in the town for younger persons to move into.

Chapter 11: Water Services, Surface Water and Wastewater

WM 11-12: Surface Water Management

Manage surface water catchments and the use and development of lands adjoining streams, watercourses and rivers in such a way as to minimise damage to property by instances of flooding and with regard to any conservation objectives of European sites within the relevant catchments and floodplains.

Please refer to **Engineering Report** and associated drawings by MHL Consulting Engineers for details.

WM 11-15: Flood Risk Assessments

To require flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.

The CCDP notes that:-

There are several Flood Relief Schemes at design stage around the County for example at Castlemartyr, Innishannon, Macroom and Middleton and Ballinacurra. There are several more projects at design stage, which may lead to works to mitigate flood risk. Also, a number of smaller schemes / studies are being carried out under the OPW Minor Works Programme. A full list of Flood Relief Schemes across the county can be viewed in the updated SFRA (s.11.11.6)

Please refer to the **site-specific Flood Risk Assessment** prepared by MHL Consulting Engineers.

Chapter 12: Transport and Mobility

TM 12.2-1: Active Travel

a) New development areas will be permeable for walking and cycling, via safe, convenient and enjoyable routes, and the retrospective implementation of walking and cycling facilities shall be undertaken where practicable in existing neighbourhoods, to give competitive advantage to these movements. See DMURS (2020 or later revision) and National Cycle Manual and Permeability Best Practice Guide (NTA) for guidance.

b) All new developments are to be designed to latest DMURS standards, unless precluded by space or the constraints, to be accessible and permeable for pedestrians, cyclists and those of reduced mobility.

c) Applications for all new development are to be accompanied by a statement of how enhanced and inclusive permeability will be achieved, to include a statement of compliance with DMURS (2020 or later revision) and a quality audit (as referred to in DMURS).

Refer to Section 5 of the Engineering Design Report prepared by MHL Consulting Engineers is submitted with this application which addresses traffic and pedestrian management including connectivity.

Refer to the DMURs compliance statement prepared by Fourem Architects.

d) Development should incorporate the retention of existing routes and linkages which contribute to permeability of an area, particularly those providing access to key services, facilities and public transport infrastructure. Loss of existing links shall not occur if their loss results in more circuitous trips.

The proposed development includes a number of new road, pedestrian and cycle links through the site. There is also potential for a new link with the Old Dairy to the west of the site. No potential link is possible to the dwellings to the south

of the site due to the difference in ground levels. No existing routes or links are compromised.

f) Deliver settlements that offer a broad range of services as well as diverse and higher density residential development to support walking and cycling.

The net density will be 33 units per hectare. This density is consistent with development plan standards and aligns with National guidance.

g) Support the function of the Cork Metropolitan Area Transport Strategy to achieve higher rates of modal shift to sustainable transport.

The proposed development places an emphasis on walking and cycling as a more appropriate mode of transport.

TM 12.5-1: Bus Transport

Large scale development proposals (over 100 residential units or employment related development likely to give rise to over 50 jobs) will be required to include a comprehensive public transport assessment to include:

- a) Assessment of how the proposal will ensure effective links to potential future bus transport.*
- b) Demonstrate options for connection to existing and future transport facilities.*
- c) Where appropriate, examine the potential for bus connectivity through the development.*
- d) Determine where additional infrastructure e.g. lay-bys/bus stops may be required*

The site is located c.2km south of Midleton Town Centre which is within reasonable walking distance and is certainly easily accessible via bicycle.

A bus route is located c.270m to the west of the site (241 bus).

TM 12.8: Traffic / Mobility Management and Road Safety

a) Where traffic movements associated with a development proposal have the potential to have a material impact on the safety and free flow of traffic on a National, Regional or other Local Routes, the submission of a Traffic and Transport Assessment (TTA) and Road Safety Audit will be required as part of the proposal. Where a Local Transport Plan exists, it will inform any TTA.

A Traffic and Transport Assessment prepared by MHL Consulting Engineers accompanies this application based on an opening year of 2028 and includes an assessment of the impact on The R630-church Road junction and the 'Grotto' junction.

b) Support demand management measures to reduce car travel and promote best practice mobility management and travel planning via sustainable transport modes

c) For developments of 50 employees or more, residential developments over 100 units, all education facilities, community facilities, health facilities, as well as major extensions to existing such uses developers will be required to prepare mobility management plans (travel plans), with a strong emphasis on sustainable travel modes consistent with published NTA guidance to promote safe, attractive and convenient, alternative sustainable modes of transport as part of the proposal. Where a Local Transport Plan exists, it will inform any Mobility Management Plan.

Refer to the Mobility Management Plan prepared by MHL Consulting Engineers which shows how sustainable travel modes will be promoted over time.

d) Ensure that all new vehicular accesses are designed to appropriate standards of visibility to ensure the safety of other road users

e) improve the standards and safety of public roads and to protect the investment of public resources in the provision, improvement and maintenance of the public road network.

Refer to the Stage 1 Road Safety Audit prepared by MHL & Associates Ltd. All items raised in the RSA have been addressed.

TM 12-9: Parking

Secure the appropriate delivery of car parking and bicycle spaces and facilities in line with the Standards set out in Section 12.24 of this document:

- a) All non-residential development proposals will be subject to maximum parking standards as a limitation to restrict parking provision to achieve greater modal shift.
- b) All residential development proposals, in Metropolitan Cork, in areas within walking distance of town centres and public transport services, will be subject to maximum parking standards as a limitation to restrict parking provision to achieve greater modal shift.
- c) Cycle parking will be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are located and designed in accordance with cycle parking design guidelines;
- d) On street car parking is to be designed such that it does not occupy unnecessary street frontage.
- e) Connectivity and accessibility between key car parking areas and primary town centre streets is to be safe and convenient.
- f) A high standard of design, layout and landscaping, including application of sustainable urban drainage systems where appropriate, is to accompany any proposal for surface car parking. Planning permission will be granted only where all the following criteria are met:
 - Respects the character of the streetscape/landscape;
 - Will not adversely affect visual amenity, and
 - Makes provision for security, and the direct and safe access and movement of pedestrians and cyclists within the site.
- g) Car parking provision is to comply with Sustainable Urban Drainage practices and other climate change adaptation and mitigation measures are to be considered, including considering the potential for landscaping to provide shade, shelter and enhancement of biodiversity.
- h) Measures to facilitate the complementary use of private car, through appropriate local traffic management including the siting of destination car-parking, is central to achieving the correct balance of modal use
- i) The provision of multimodal facilities including carpooling spaces, secure bicycle lockers, public bicycle sharing, etc. are to be considered in the provision of parking for all non-residential developments or multi-unit residential developments where appropriate.

It is proposed to provide a total of 214 parking spaces within the development (including 4 disabled spaces) as follows:

- 163 car park spaces for dwellings
- 24 no. spaces for apartments
- 27 no. spaces for the commercial/office units and creche.

The maximum car parking standards in the CCDP 2022-28 are outlined below:

Table 12.6: Car Parking Requirements for New Development (Maximum per sqm)

Creches	1 space per 3 staff + 1 space per 10 children
Office	1 space per 17sq.m + 10% of staff parking for visitors
Café	1 space per 5 (net sq.m)
Retail	1 space per 20 sqm + 1 Lorry space per 750 sqm
Medical	3 per consulting room + 1 space per doctor/ Consultant +1 space per 3 nursing and ancillary staff
Residential	2 spaces per dwelling & 1.25 spaces per apartment

Residential

The total residential car parking of 187 spaces is below the maximum car parking requirement under the CDP.

103 dwellings x 2 spaces	= 206
25 apartments x 1.25 spaces	= 31.25
Total max. requirement	= 237.25

Creche

It is estimated that there will be 8 no. staff and 34 no. children. This results in a maximum car parking provision of 3 spaces for staff and 4 for children. A total of 7 no. spaces are proposed for the creche which meets the maximum requirement.

Commercial

No internal layouts for the commercial units are provided as part of the application as this will be undertaken by the end user once established. As such it is difficult to determine the maximum car parking requirements based on the stipulations outlined in the CCDP.

27 no. car park spaces are provided for the commercial/office units which is below the maximum.

All car parking has been located at a location that is conveniently accessible from each proposed dwelling unit – refer to the section in the Architect's Design Statement entitled Assigned Parking for a breakdown of where car parking is provided for each area within the scheme.

TM 12-12: EV Charging

- a) *Infrastructure for Electric Vehicles will be integrated into developments in line with national requirements*
- c) *New applications for non-residential development with more than 10 parking spaces are to provide for the installation of at least one EV recharging points (or as required by national policy should such requirement specify a higher provision).*
- d) *All residential development should be constructed to be capable of accommodating future charging points as required within the curtilage of the dwelling where possible*

Provision is made for EV charging spaces at locations identified in the Architects Design Statement.

The commercial element of the scheme meets the minimum of 1 no. EV recharging point.

Ducting will be provided for dwellings to enable future charging points – see locations identified in the Architects Design Statement.

Table 12.9 – Cycle Parking

Requirements for New Development (Minimum per sqm)	
Creches	1 long-stay per 5 staff and 1 short-stay per 10 children
Residential:	1 long-stay per housing unit and 1 short-stay for every 5 housing units & 1 long-stay per bedroom for apartments and 1 short stay for every 2 apartment units.
Office	1 per 200sq.m gfa (long and short stay)
Café	1 per 5 staff (long stay) + 1 per 100sq.m public floor area (short stay)
Retail	1 per 5 staff (long stay) + 1 per 100sq.m gfa (short stay)
Medical	1 per 5 Staff (long stay) + 1 per 2 consulting rooms (short stay)

Creche: The minimum requirement is 2 long stay spaces for staff and 3 short stay for children. 10 no. covered bicycle parking spaces are proposed for the crèche.

Commercial

14 no. public bicycle spaces are proposed for commercial, retail and office use.

Residential

Apartments: The total number of bedrooms is 39. This generates a requirement for 39 long stay and 12 short stay space – a total of 51 spaces. 60 no. spaces are proposed which is above the minimum requirement - see locations identified on in the Architects Design Statement.

30 no. visitor cycle spaces provided throughout the scheme which exceeds this minimum requirement - see locations identified on pg.22 of the Architects Design Statement.

Houses: In terms of long stay every house has a rear garden where a bike can be stored. In terms of short stay, the minimum requirement is 21 no. spaces. We again refer to the 30 no. visitors spaces provided.

Chapter 14 Green Infrastructure and Environment

GI 14-1: Green and Blue Infrastructure Objectives

a) Create an integrated and coherent green infrastructure for the County by encouraging the retention and strengthening of substantial networks of green space in urban, urban fringe and the wider countryside to serve the needs of communities now and in the future and as a key contributor to climate mitigation and climate adaptation.

b) Develop the green infrastructure network (including green corridors) to ensure the conservation and enhancement of biodiversity, including the protection of Natura 2000 European Sites, the provision of accessible parks, open spaces and recreational facilities (particularly within settlements), the sustainable management of water, the maintenance of landscape character and the protection and enhancement of architectural and archaeological heritage.

c) Capitalise on and highlight the multifunctional benefits/opportunities

(ecosystem services) that green and blue infrastructure can present. Seek to advance the use of nature based solutions as an alternative to traditional infrastructure. Seek to advance an ecosystem services approach and ecosystem services valuation as a decision-making tool in plans and projects.

d) Recognise rivers and streams (and their wider riparian corridors) as one of the natural foundations for multi-functional green and blue infrastructure corridors. Seek to strengthen ecological linkages which watercourses have with other water dependent habitats as well as with hedges/treelines, woodland and scrub in the wider landscape.

e) Ensure that all settlements have an adequate level of quality green and recreational infrastructure (active and passive) taking into account existing deficits, planned population growth as well as the need to serve their surrounding hinterlands.

f) Achieve a net gain in green infrastructure through the protection and enhancement of existing assets and through the provision of new green infrastructure as an integral part of the planning process. Encourage the provision of different green infrastructure elements, such as trees in urban areas and green roofs in town centres, so that a net gain in green infrastructure is achieved over the lifetime of this Development Plan.

g) Seek to increase investment in green infrastructure provision and maintenance by accessing relevant EU funding mechanisms and national funding opportunities including tourism related funding.

h) Integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting biodiversity and other landscape resources.

i) Support initiatives and programmes which seek to strengthen the green and blue infrastructure and work with communities and other stakeholders in furthering the green and blue infrastructure concept infrastructure and work with communities and other stakeholders in furthering the green and blue infrastructure concept.

Please refer to the Green Infrastructure & Landscape Strategy Report prepared by Fourem Architects. This plan was informed by surveys carried out by Holly Arboriculture (trees) and O'Donnell Environmental Ltd (flora and fauna).

14-3: Green Infrastructure and Development

a) Require new development and redevelopment proposals, where considered appropriate, to contribute to the protection, management and enhancement of the existing green and blue infrastructure of the local area in terms of the design, layout and landscaping of development proposals.

b) Require all development to submit a green infrastructure statement outlining how the proposal contributes to green and blue infrastructure both within its environs as well as within the wider settlement. Larger developments (multiple residential developments including Part 8 applications, retail, industrial, mineral extraction, etc) will be expected to prepare a Landscape/Green (and Blue) Infrastructure Plan including a Landscape Design Rationale. This Plan should identify environmental assets and include proposals which protect, manage and develop green infrastructure resources in a sustainable manner.

Please refer to the Green Infrastructure & Landscape Strategy Report prepared by Fourem Architects.

GI 14-4: Recreation and Amenity

- a) support the provision of recreation and amenity facilities in new developments and ensure that the widest range of facilities is provided at locations which can serve the wider community and intergenerational activities, which are accessible to members of the community of all ages and abilities, through initiatives in partnership with community groups and sporting organisations.*
- b) Seek opportunities to improve the quality and capacity of existing recreation and amenity facilities, through initiatives with both public and private sector (sports governing bodies, local community partnerships and private development proposals) and where appropriate the Council will use its powers under Section 48 of the Planning and Development Act 2000 to require development levies to achieve the enhancement of these facilities.*
- c) Ensure the protection, and seek the enhancement and wise management of existing recreational facilities and public open space, and ensure that all new developments make adequate provision for recreational and amenity facilities in accordance with the requirements of the Councils Recreation and Amenity Policy (Interim) and any successor policy and having regard to the Councils policy regarding the management of Green Infrastructure assets.*

Please refer to the Landscape Plan and Landscape Report prepared by Fourem Architects which details the proposed recreation and amenity facilities which are accessible to members of the community of all ages and abilities.

GI 14-6: Public/private open space provision

- a) Public Open Space within Residential Development shall be provided in accordance with the standards contained in Cork County Councils Interim Recreation & Amenity Policy (2019) and any successor policy, the "Guidelines on Sustainable Residential Development in Urban Areas" and "Making Places : a design guide for residential estate development. Cork County Council Planning Guidance and Standards Series Number 2".*
- b) Promote the provision of high quality, accessible and suitably proportioned areas of public open space and promote linking of new open spaces with existing spaces to form a green infrastructure network.*
- c) Apply the standards for private open space provision contained in the Guidelines on Sustainable Residential Development in Urban Areas and the Urban Design Manual (DoEHLG 2009) and Cork County Council's Design Guidelines for Residential Estate Development. With regard to apartment developments, the guidelines on Sustainable Urban Housing: Design Standards for New Apartments will apply.*

Public Open Space is provided within the scheme. It measures 0.46 hectares which equates to 12.6% of the total site area. It is conveniently accessible to all residents and is overlooked by proposed housing to ensure passive surveillance. Refer to the Landscaped Plan prepared by Fourem Architects for details of the high-quality design of same.

Communal open space is provided for the apartments which, as noted above, exceeds minimum requirements in the Sustainable Urban Housing: Design Standards for New Apartments.

GI 14-9: Landscape

- a) Protect the visual and scenic amenities of County Cork's built and natural environment.*
- b) Landscape issues will be an important factor in all land-use proposals, ensuring that a proactive view of development is undertaken while protecting the environment and heritage generally in line with the principle of sustainability.*
- c) Ensure that new development meets high standards of siting and design.*
- d) Protect skylines and ridgelines from development.*
- e) Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.*

The site is located within a High Value Landscape but it is highlighted that the site is located within an urban area and is a brownfield site which has already been the subject of previous development.

The baseline measurement for any visual impact assessment is the established development on the site including the mill buildings, many of which are proposed to be kept.

It is submitted that the bulk, size, mass and scale of the proposed development are not significantly different to the existing development on the site.

A concerted effort has been made to avoid removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments on the site.

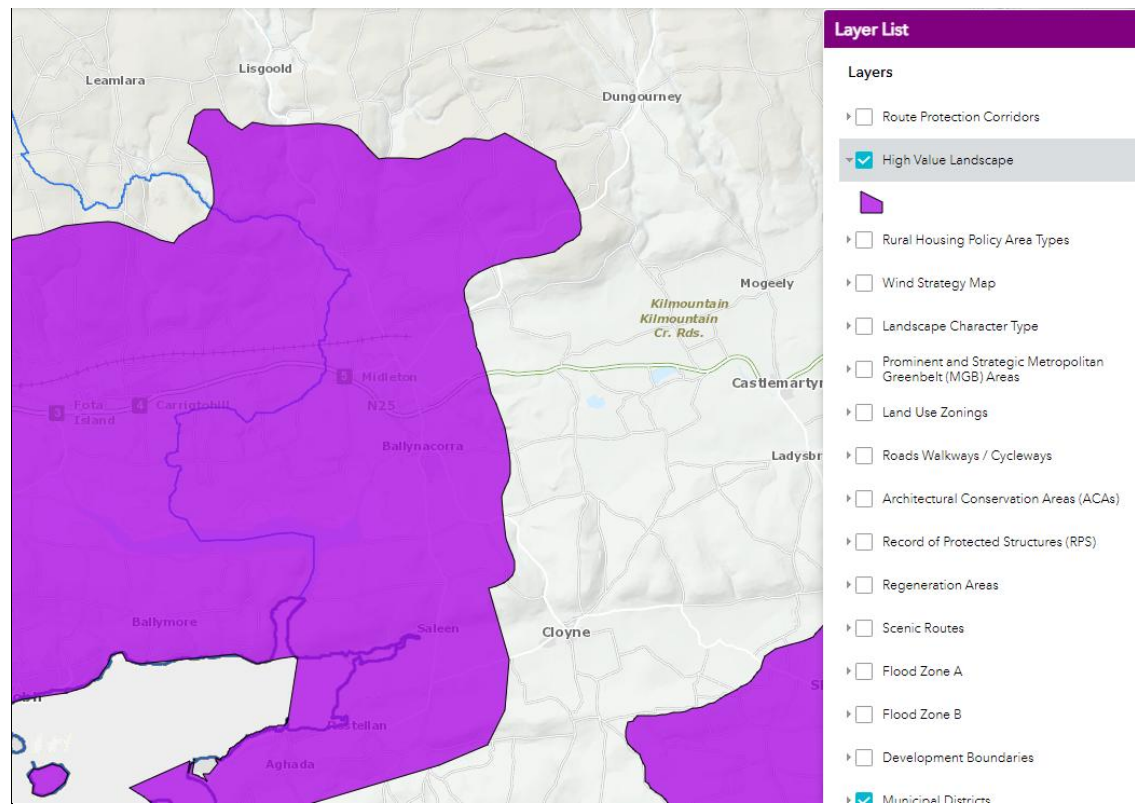


Fig No.25 Extract from Cork Co. Co. Map Browser showing the site contained in a High Value Landscape.

GI 14-12: General Views and Prospects

Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.

There are no views or prospects of note in the vicinity of the site. The site is located over 270m from the water at the east channel of Cork Harbour with significant urban development between.

GI 14-13: Scenic Routes

Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. The scenic routes identified in this Plan are shown on the scenic amenity maps in the CDP Map Browser and are listed in Volume 2 Heritage.

The R630 is designated as a Scenic Route and forms part of a wider scenic route hugging the coastline. It is submitted that the key views are those towards the coastline and not those inland facing views in the opposite direction. As such views from this Scenic Route are not considered to be relevant in respect of the current application. Notwithstanding same, we note that the proposed development is situated a minimum of located 280m from the Scenic View at its closest point with substantial existing urban development between, including buildings of significant size and scale that obscure views of the site.



Fig No.26 Extract from Cork Co. Co. Map Browser showing the scenic view along the R630 relative to the site.

GI 14-15: Development on the Approaches to Towns and Villages

Ensure that the approach roads to towns and villages are protected from inappropriate development, which would detract from the setting and historic character of these settlements.

The eastern portion of the site fronts onto the R629 which is an approach road into the town, albeit there is other urban development south of the site along this road (Rose Hill Estate).

A concerted effort has been made to ensure an attractive edge treatment along this road in order to make a positive contribution to the amenity of this approach road.

Chapter 15: Biodiversity and environment

BE 15-6: Biodiversity and New Development

Provide for the protection and enhancement of biodiversity in the development management process and when licensing or permitting other activities by;

- a) Providing ongoing support and guidance to developers on incorporating biodiversity considerations into new development through pre-planning communication and Council Guidelines: Biodiversity and the Planning Process and any updated versions of this advice;*
- b) Encouraging the retention and integration of existing trees, hedgerows and other features of high natural value within new developments;*
- c) Requiring the incorporation of primarily native tree and other plant species, particularly pollinator friendly species in the landscaping of new developments;*
- d) Fulfilling Appropriate Assessment and Environmental Impact Assessment obligations and carrying out Ecological Impact Assessment in relation to development and activities, as appropriate;*
- e) Ensuring that an appropriate level of assessment is completed in relation to wetland habitats subject to proposals which would involve drainage or reclamation. This includes lakes and ponds, watercourses, springs and swamps, marshes, heath, peatlands, some woodlands as well as some coastal and marine habitats.*
- f) Ensuring that the implementation of appropriate mitigation (including habitat enhancement, new planting or other habitat creation initiatives) is incorporated into new development, where the implementation of such development would result in unavoidable impacts on biodiversity - supporting the principle of biodiversity net gain.*

Please refer to the **Ecological Impact Assessment (EcIA)** prepared by O'Donnell Environmental Ltd. It notes the following:

The site contains a series of derelict structures including Rosehill House and Eastville House. Fire damage has affected a large proportion of the commercial structures. No natural watercourses exist onsite, with the West Ballynacora Stream flowing approximately 10m north of the site and discharging into Cork Harbour.

The site is largely characterised by artificial surfaces and recolonising ground of low ecological value, with portions of scrub and mature trees providing higher ecological value. No high impact or Schedule III invasive plant species have

been identified onsite. Bat roosting was identified in Rosehill House and Eastville House, and following Marnell (2022) this roosting is considered to be of relatively low conservation significance. A locally rare population of bee orchids was identified at the east of the site. Hedgehog, a species in decline nationally, was recorded in the scrub surrounding Rosehill House. The red-listed Kestrel was identified successfully breeding within the mills complex, with amber-listed Barn Swallow nesting also noted. Potential exists for nesting of other species such as Swift, House Martin and House Sparrow. Overall, the site is considered to be of Local Importance (Higher Value) in terms of its ecological receptors.

Continued bat roosting will be facilitated through artificial boxes on structures and the adaptation of the roof spaces of Rosehill House outbuildings and Kiln Building. Continued bird breeding will be facilitated for the above species through a similar integration of bird nesting structures throughout the site. bee orchids will be facilitated within their own designated meadow, alongside other measures such as native hedgerow and tree planting and establishment of flowering lawns.

With the implementation of the avoidance and mitigation measures outlined herein, and with consideration of cumulative effects, the overall ecological impact of the proposed project (relative to the 'do-nothing' scenario) is considered to be slight negative at a local level during construction. Following completion of construction, a neutral effect overall is expected, and following establishment of landscaping measures in the operational phase the predicted ecological effect of the proposed development is considered to be a slight, positive effect at a local level (following EPA, 2022). Following CIEEM (2024) the ecological effect of the proposed development is considered to be 'not significant'.

The applicant invites a condition of planning permission for the recommendations in the EcIA to be taken into account.

A **Bat Derogation Licence** issued by the Minister for Housing, Local Government & Heritage (Ref. DER-BAT-2025-227) has been obtained by the applicant. This expired at the end of 2025 and a new licence has been applied for. It is not expected that there will be any issue in getting a new licence and the applicant seeks a condition of planning permission for the licence to be obtained prior to commencement of development on site.

Please refer to the **Environmental Impact Assessment Screening** report prepared by O'Donnell Environmental which concludes that a mandatory EIA or sub-threshold EA are not required.

Please refer to the **Appropriate Assessment Screening & Natura Impact Statement** prepared by O'Donnell Environmental. This assessment consists of two stages, namely AA Screening (Stage 1) and Natura Impact Statement (Stage 2). Mitigation applied at NIS stage consists of an avoidance measure in relation to the potential for the occupation of the proposed development to result in a deterioration of water quality in Cork Harbour by exacerbating a capacity issue at Midleton WWTP.

Provided the mitigation measures referred to herein are fully implemented, it is objectively concluded that the proposed project, either individually or in combination with other plans or projects, is not likely to have significant adverse effects on the Great Island Channel SAC, Cork Harbour SPA, or any other Natura 2000 site.

BE 15-8: Trees and Woodlands

a) Protect trees the subject of Tree Preservation Orders;
d) Preserve and enhance the general level of tree cover in both town and country. Ensure that development proposals do not compromise important trees and include an appropriate level of new tree planting.
e) Where appropriate, to protect mature trees/groups of mature trees and mature hedgerows that are not formally protected under Tree Preservation Orders.

Please refer to the **Arboricultural Impact Assessment** prepared by Holly Arboricultural. This AIA notes that there is no Tree Preservation Order associated with the site.

A total of 49 no. trees were assessed and tagged as part of the survey fieldwork – mainly in the vicinity of Rose Hill house:

- 4 or 8% of the trees included in this assessment were classified as category 'U' (unsuitable for long-term retention under current site conditions).
- 1 or 2% of the trees included in this assessment were classified as category 'A' trees (high value)
- 15 or 31% of the trees included within this assessment were classified as category 'B' trees (moderate value)
- 29 or 59% of the trees included within this assessment were classified as category 'C' trees (low value)

A total of 33 individually tagged trees will be removed to facilitate the proposed development, along with 4 no. tree groups.

Given this is a brownfield site there is only a limited amount of trees, flora and fauna associated with the site but a concerted effort has been made to retain all existing biodiversity of note. The landscape plan ensures significant enhancement of biodiversity on the site over time.

The landscape plan prepared by Fourem Architects includes a total of 404 new trees (all of native species) as follows:

Street Trees/ Public Space Trees	104
Garden Trees	134
Boundary Trees	166c.

which will more than compensate for the loss of 33 trees over time.

It should be noted that it is proposed to retain a number of historic shrubs in the western portion of the site which are identified on the drawing titled Ground Cover Planting.

Chapter 16: Built Heritage

County Development Plan Objectives

HE 16-2: Protection of Archaeological Sites and Monuments

Secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments and their setting included in the Sites and Monuments Record (SMR) (see www.archaeology.ie) and the Record of Monuments and Places (RMP) and of sites, features and objects of archaeological and historical interest generally. In securing such preservation, the planning authority will have regard to the advice and recommendations of the Development Applications Unit of the Department of Housing, Local Government and Heritage as outlined in the Frameworks and Principles for the Protection of the Archaeological Heritage policy document or any changes to the policy within the lifetime of the Plan.

The subject site contains two archaeological monuments, a Country House CO076- 044---, known as Rose Hill House, and a Maltings complex CO076-075----, commonly known as Bennett's Maltings, the industrial archaeological heritage of which dominates the site.

Please refer to the **Archaeological & Industrial Heritage Impact Assessment** prepared by Shanarc Archaeology.

This includes a Preliminary Industrial Archaeological Survey Of The Kearney's Cross/Village Maltings of J. H. Bennett & Company Ltd, Ballinacurra West, Middleton Co. Cork by Colin Rynne, Ursula O'Mahony and Florence M. Hurley, Historic Building Survey Unit, Department of Archaeology, University College Cork.

The assessment highlights that the preliminary industrial archaeological survey by Dr. Colin Rynne has identified that the maltings was the last floor malting (i.e. the last of its type) to operate in Ireland, and that:

1. industrial heritage equipment and machinery is present at the Maltings complex, such as large-sized water cisterns, steeping cisterns, a worm conveyor, roof structural timbers and a line shaft pulley in the Old Maltings or No. 3 Malt House
2. the maltings section of the surviving complex, including the Old Maltings or No. 3 Malt House, and its historical associations are of national significance, and
3. the early 20th century Cereal Testing Station is of international significance in terms of the development of agricultural science, and its contribution to the development of the world brewing industry i.e. creation of the barley hybrid Spratt-Archer that became one of the most widely grown malting barleys world-wide. The Ballinacurra Mill LRD proposal, by removing parts of the Old Maltings or No. 3 Malt House, directly impacts structural remains identified as being of national significance from a historical and scientific perspective.

To mitigate identified impacts, it has been recommended that all of the buildings forming part of the Maltings complex be retained, with the exception of the 1960s mass concrete grain storage silo.

Proposals for the removal of structures shall be discussed and agreed in consultation with the National Monuments Service, Department of Housing, Local Government and Heritage, along with an agreed method for preservation by record.

Dr. Colin Rynne provides an archaeological methodology for site clearance and on-going industrial archaeology recording in the AIHIA. Specific recommendations on the retention of industrial heritage equipment or features and their potential integration into the proposed scheme shall be made on the completion of a full archaeological survey at the Maltings in line with the outlined methodology.

It is recommended that the completion of a full archaeological survey at the Maltings be carried out during site clearance undertaken specifically for this purpose, well in advance of general preparatory or construction work, and that the survey's recommendations are submitted for consultation and agreement with the National Monuments Service and the Local Authority. Locations where heritage equipment can be preserved internally and externally in the proposed scheme will be submitted as part of the planning application. The methodology provides for the recording of buildings once cleared using laser scanning and photogrammetry, including of any buildings not retained in the proposed LRD.

Given the safety issues associated with the site we fully concur with this approach. It will only be safe to enter once planning permission approved and a contractor is involved to make entry safe. We invite a condition of planning permission from the Council for the applicant to undertake a survey of all industrial heritage items and to provide a report for the Planning Authority with recommendations for written agreement prior to the commence of development on site.

HE 16-4: Zones of Archaeological Potential in Historic Towns and Settlements

Proposed development works in Historic Towns and settlements, Zones of Archaeological Potential, Zones of Notification and the general historic environs in proximity to the zones, should take cognisance of the impact potential of the works, and all appropriate archaeological assessments employed to identify and mitigate the potential impacts.

Please refer to the **Archaeological & Industrial Heritage Impact Assessment** prepared by Shanarc Archaeology. The site is not located in a Zone of Archaeological potential.

HE 16-5: Zones of Archaeological Potential

Protect the Zones of Archaeological Potential (ZAPs) located within historic towns, urban areas and around archaeological monuments generally. Any development within the ZAPs will need to take cognisance of the upstanding

and potential for subsurface archaeology, through appropriate archaeological assessment.

Please refer to the **Archaeological & Industrial Heritage Impact Assessment** prepared by Shanarc Archaeology. The site is not located in a Zone of Archaeological potential.

HE 16-9: Archaeology and Infrastructure Schemes

All large scale planning applications (i.e. development of lands on 0.5 ha or more in area or 1km or more in length) and Infrastructure schemes and proposed roadworks are subjected to an archaeological assessment as part of the planning application process which should comply with the Department of Arts, Heritage and the Gaeltacht's codes of practice. It is recommended that the assessment is carried out following pre planning consultation with the County Archaeologist, by an appropriately experienced archaeologist to guide the design and layout of the proposed scheme/development, safeguarding the archaeological heritage in line with Development Management Guidelines.

The site is larger than then 0.5ha threshold to qualify as 'large-scale' and therefore an archaeological assessment is required. Please refer to the **Archaeological & Industrial Heritage Impact Assessment** prepared by Shanarc Archaeology which meets this requirement.

County Development Plan Objectives

HE 16-10: Management of Monuments within Development Sites

Where archaeological sites are accommodated within a development it shall be appropriately conservation/protection with provision for a suitable buffer zone and long-term management plan put in place all to be agreed in advance with the County Archaeologist.

Please refer to the Archaeological & Industrial Heritage Impact Assessment prepared by Shanarc Archaeology. The applicant invites a condition of planning for a long-term management plan to be agreed prior to commencement of development. A proper survey can only be carried out when the site is made safe by a contractor.

HE 16-13: Undiscovered Archaeological Sites

To protect and preserve previously unrecorded archaeological sites within County Cork as part of any development proposals. The Council will require preservation in situ to protect archaeological monuments discovered. Preservation by record will only be considered in exceptional circumstances.

The applicant invites a condition of planning permission for archaeological monitoring during the construction phase.

HE 16-14: Record of Protected Structures

- a) The identification of structures for inclusion in the Record will be based on criteria set out in the Architectural Heritage Protection Guidelines for Planning Authorities (2011).*
- b) Extend the Record of Protected Structures in order to provide a comprehensive schedule for the protection of structures of special importance in the County during the lifetime of the Plan as resources allow.*
- c) Seek the protection of all structures within the County, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. In accordance with this objective, a Record of Protected Structures has been established and is set out in Volume Two Heritage and Amenity, Chapter 1 Record of Protected Structures.*
- d) Ensure the protection of all structures (or parts of structures) contained in the Record of Protected Structures.*
- e) Protect the curtilage and attendant grounds of all structures included in the Record of Protected Structures.*
- f) Ensure that development proposals are appropriate in terms of architectural treatment, character, scale and form to the existing protected structure and not detrimental to the special character and integrity of the protected structure and its setting.*
- g) Ensure high quality architectural design of all new developments relating to or which may impact on structures (and their settings) included in the Record of Protected Structures.*
- h) Promote and ensure best conservation practice through the use of specialist conservation professionals and craft persons.*
- i) In the event of a planning application being granted for development within the curtilage of a protected structure, that the repair of a protected structure is prioritised in the first instance i.e. the proposed works to the protected structure should occur, where appropriate, in the first phase of the development to prevent endangerment, abandonment and dereliction of the structure.*

Protected Structures

There are 2 no. Protected Structures associated with the site:

1. **Rose Hill House. RPS No. 520** - NIAH (20907635 national significance) and archaeological monument (Co076-044 country house).
2. **Ballinacorra Mill, RPS No. RPS 523** - The complex contains several NIAH sites of regional significance including;
20907637- J.H. Bennett and Company: Malt House (which relates to the main mills block facing the street and erected in the late 19th century)

20907639 – Malt House expansion c.1920

20907636 – Eastville House, a detached five bay two storey house built in the late 18th century. The NIAH have recorded a similar house on the other side of the street- 20907634. It is possible that these buildings were associated with the milling complex and may have housed managers or owners.

The milling complex is also an archaeological monument CO076-75---.

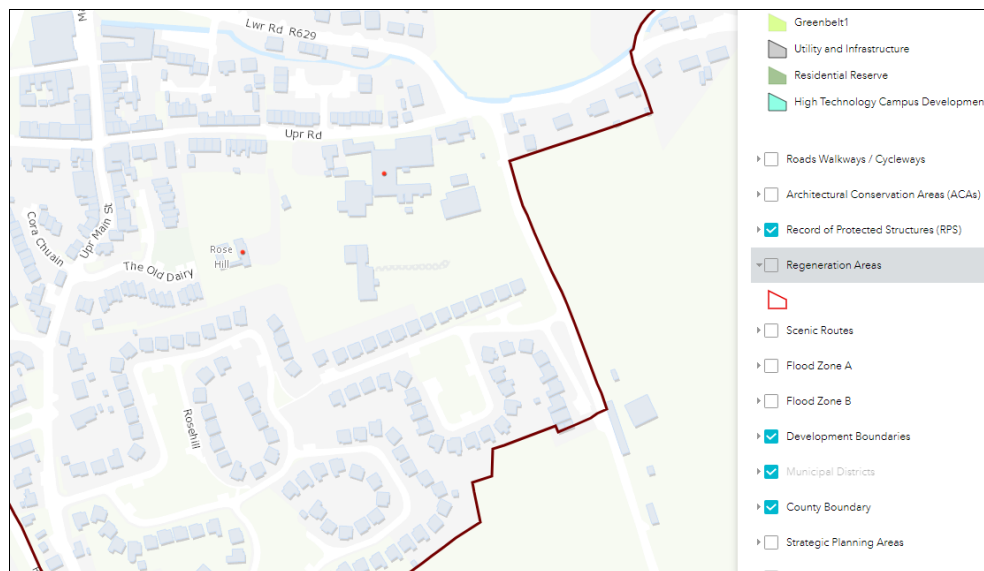


Fig No.27 Extract from Cork Co. Co. Map Browser showing the location of the two Protected Structures associated with the site – red symbols.

Please refer to the **Conservation Reports, Architectural Impact Assessment and Historic Landscape Assessment** prepared by Fourem Architects, Grade 1 Conservation Architects.

HE 16-15: Protection of Structures on the NIAH

Protect where possible all structures which are included in the NIAH for County Cork, that are not currently included in the Record of Protected Structures, from adverse impacts as part of the development management functions of the County.

Please refer to the **Conservation Report for Eastville House** prepared by Fourem Architects which outlines how Eastville House which is listed in the NIAH (but not a Protected Structure) is integrated into the proposed development.

HE 16-16: Protection of Non- Structural Elements of Built Heritage

Protect non-structural elements of the built heritage. These can include designed gardens/garden features, masonry walls, railings, follies, gates, bridges, shopfronts and street furniture. The Council will promote awareness and best practice in relation to these elements.

Please refer to the **Mill Buildings Architectural Impact Assessment** prepared by Fourem Architects and the Archaeological & Industrial Heritage Impact Assessment prepared by Shanarc Archaeology.

HE 16-20: Historic Landscapes

a) Recognise the contribution and importance of historic landscapes and their contribution to the appearance of the countryside, their significance as archaeological, architectural, historical and ecological resources.

b) Protect the archaeological, architectural, historic and cultural element of the historic/heritage landscapes of the County of Cork.

c) All new development within historic landscapes should be assessed in accordance with and giving due regard to Cork County Councils 'Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings' or any other relevant guidance notes or documents issued during the lifetime of the Plan.

Please refer to the **Historic Landscape Assessment** prepared by Fourem Architects.

County Development Plan Objectives

HE 16-24: Naming of New Developments

Promote and preserve local place names, local heritage and the Irish language by ensuring the use of local place names or geographical or cultural names which reflect the history and landscape of their setting in the naming of new residential and other developments. Such an approach will be a requirement of planning permissions for new developments.

The applicant invites a condition of planning permission for the naming of the development to be agreed in writing with the Planning Authority prior to commencement of development. Suggested naming has been included in the architect's drawings.

Chapter 17 Climate Action

CA 17-2: In order to achieve a reduction in greenhouse gas emissions, an increase in renewable energy production, an increase in energy efficiency and enhanced biodiversity, support the transition to a low carbon, competitive, climate resilient and environmentally sustainable economy by 2050 through implementation of the policies of this plan that seek to deliver the following:

- compact growth,*
- integrated land use and transport,*
- sustainable transport choices,*
- liveable settlements,*
- renewable energy production and reduced energy consumption,*
- enhanced ecological biodiversity and*
- climate adaptation measures such as through flood risk management, sustainable urban drainage systems and high quality placemaking and design.*

The proposed development represents compact growth by making use of an established underutilised, brownfield site within an established urban area. The proposed development will also be located close to public transport and will include sustainable travel connections to same (pedestrian and cycle).

Please refer to page 8 of the Design Statement 'Homes – Architectural Design' prepared by Foureem Architects for details on reduced energy consumption/energy efficiency. The homes are energy efficient and allow for many opportunities for solar panels.

Please refer to the **Engineering Services Report** prepared by MHL Consulting Engineers climate adaptation measures via flood risk management and sustainable urban drainage systems. The Landscape Design report also addressed sustainable urban drainage systems.

Chapter 18: Zoning and Land Use

ZU18-2: Development and Land Use Zoning

Ensure that development, during the lifetime of this Plan, proceeds in accordance with the general land use objectives and any specific zoning objectives that apply to particular areas as set out in this Plan

The majority of the subject site is zoned **Town Centre/Neighbourhood Centre**. The CCDP states that:

"The focus of our town centres is to develop and consolidate with an appropriate mix of commercial, recreational, cultural, leisure and residential uses, and to enhance and develop the urban fabric of these centres in accordance with the principles of urban design, conservation and sustainable development"

and

"Another important element of our town centres is their role to deliver compact growth and contribute to the delivery of residential development".

County Development Plan Objective
ZU 18-17: Town Centres/ Neighbourhood Centres

- a) Promote the development of town centres and neighbourhood centres as the primary locations for retail and other uses that provide goods or services principally to visiting members of the public. The primary retail areas will form the main focus and preferred location for new retail development, appropriate to the scale and function of each centre and in accordance with the Retail Strategy. Residential development will also be encouraged particularly in mixed use developments while the use of upper floors of retail and commercial premises in town centres for residential use will in particular be encouraged.
- b) Recognise that where it is not possible to provide the form and scale of development that is required on a site within the core area, consideration can be given to sites on the edge of the core area based on sequential approach.

Appropriate Uses in Town Centre/Neighbourhood Centres

Retail, cultural uses, recreation uses, hotel, bed and breakfast, public houses, financial services, professional services, medical and healthcare services, leisure facilities, places of worship, residential, mixed residential, childcare facilities, education facilities, community facilities, civic uses, offices, public transport facilities, car parks, funeral homes.

The proposed mix of land uses involving residential, café and commercial uses (retail, medical, offices) are appropriate uses under this Town Centre zoning objective.

The western portion of the site is zoned **Existing Residential/Mixed Residential and Other Uses**, the objective of which is:-

" to conserve and enhance the quality and character of established residential communities and protect their amenities ... The strengthening of community facilities and local services will be facilitated subject to the design, scale, and use of the building or development being appropriate for its location".

County Development Plan Objective
ZU 18-9: Existing Residential/Mixed Residential and Other Uses *

The scale of new residential and mixed residential developments within the Existing Residential/Mixed Residential and Other Uses within the settlement network should normally respect the pattern and grain of existing urban development in the surrounding area. Overall increased densities are encouraged within the settlement network and in particular, within high quality public transport corridors, sites adjoining Town Centres Zonings and in Special Policy Areas identified in the Development Plan unless otherwise specified, subject to compliance with appropriate design/amenity standards and protecting the residential amenity of the area.

Other uses/non-residential uses should protect and/or improve residential amenity and uses that do not support, or threatens the vitality or integrity of, the primary use of these existing residential/mixed residential and other uses areas will not be encouraged.

*Note: This is based on Existing Residential/Mixed Residential and Other Uses applying to main towns and to key villages with a population of over 1500 or a population expected to grow over to 1500 in the lifetime of the Plan.

The proposed land uses involving residential (house and apartments) and creche are appropriate under this zoning objective.

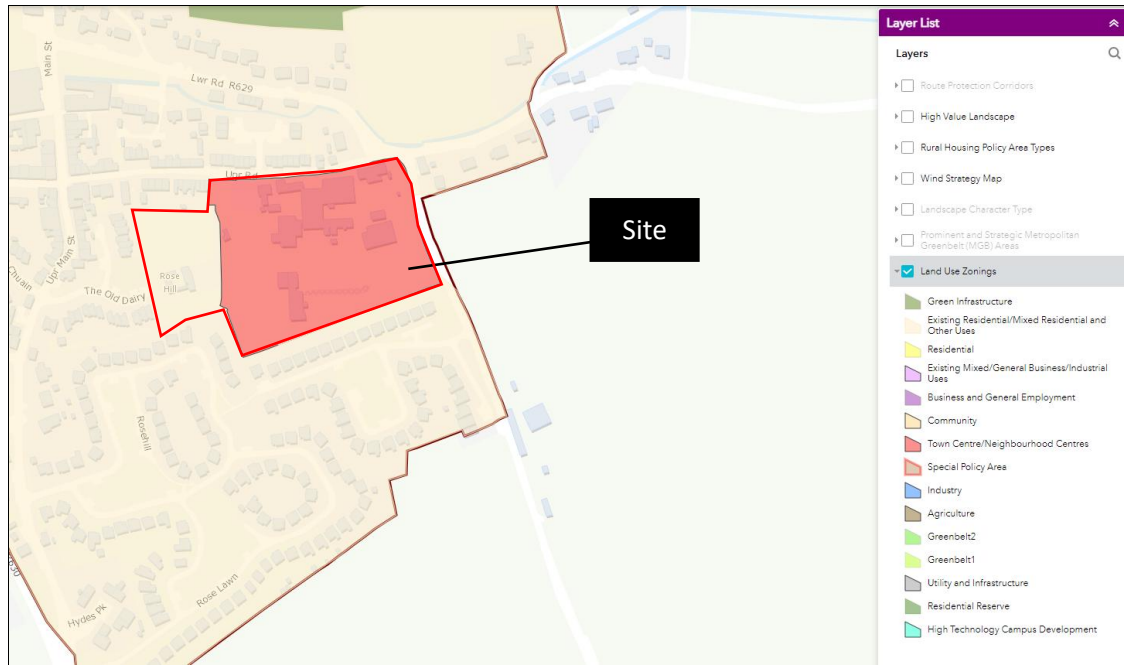


Fig No.28 Extract from CCDP 2022-28 zoning maps showing the site outlined in red with Existing Residential/Mixed Residential & Other Uses zoning to the west and town Centre/Neighbourhood Centre zoning to the east.

Regeneration Area

The eastern portion of the site is identified as a **Regeneration Area** where residential development is encouraged.

County Development Plan Objective ZU 18-8: Vacant Site Levy-Residential Regeneration Areas

Encourage the development and renewal of areas, on lands zoned as residential that meet the criteria as set out in the Urban Regeneration and Housing Act, 2015, as amended, and on lands designated as regeneration areas, identified in the Plan, having regard to the Core Strategy, that are in need of regeneration, in order to prevent-

- (i) Adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,
- (ii) Urban blight and decay,
- (iii) Anti-social behaviour or
- (iv) A shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses.



Fig No.29 Extract from CCDP on-line mapping showing eastern portion of site identified as Regeneration Area.

Volume 4 - South Cork

Chapter 3 East Cork Municipal District

County Development Plan Objectives – East Cork MD: General Objectives for Midleton⁵

MD-GO-01

Plan for development to enable Midleton to achieve its target population of 19,423. Provide a balance between the provision of housing and employment uses in the town, to support Midleton's development as an integrated live/work destination.

The subject development will provide 128 no. dwelling units in the short to medium term which will help achieve the planned growth of the settlement to 19,423 persons.

MD-GO-03

In order to secure the sustainable population growth and supporting development proposed in GO-01, appropriate and sustainable water and waste water infrastructure that will secure the objectives of the relevant River

⁵ Only those objectives relevant to the proposed development are outlined.

Basin Management Plan and the Great Island Channel Cork Harbour Special Area of Conservation, and Cork Harbour Special Protection Area, must be provided and be operational in advance of the commencement of any discharges from the development. Wastewater infrastructure must be capable of treating discharges to ensure that water quality in the receiving water does not fall below legally required levels.

The proposed development will ensure that water quality in the receiving water does not fall below legally required levels. Refer to details of the water and wastewater infrastructure for the proposed development the drawings and report prepared by MHL Consulting Engineers.

MG-GO-04

The Green Infrastructure assets of Midleton include its river corridors, mature trees, wetlands, woodlands, hedgerows and the estuarine habitats associated with the Owenacurra River. The estuary forms part of the Great Island Channel SAC and the Cork Harbour SPA. This area supports important wetland habitats and is also an important over wintering site for significant numbers of a range of wetland bird species. New development should be sensitively designed and planned to provide for the protection of these features and will only be permitted where it is shown that it is compatible with the requirements of nature conservation directives and with environmental, biodiversity and landscape protection policies as set out in Volume One Main Policy Material and Volume Two Heritage and Amenity.

The proposed development complies with the requirements of nature conservation directives and with environmental, biodiversity and landscape protection policies as set out in Volume One Main Policy Material and Volume Two Heritage and Amenity of the CDP.

Please refer to the Landscape and Green Infrastructure Report prepared by Foureem Architects.

Please refer to the ecological reports by O'Donnell Environmental (EcIA and NIS).

MD-GO-05

In accordance with Objective WM 11-10 of Chapter 11 'Water Management', in Volume One of this Plan all new development will need to make provision for Sustainable Urban Drainage Systems (SuDs) and provide adequate storm water infrastructure. Surface water Management and Disposal should be planned in

an integrated way in consideration with land use, water quality, amenity and habitat enhancements as appropriate.

The proposed development makes provision for Sustainable Urban Drainage Systems (SuDs) and provides adequate storm water infrastructure.

Please refer to the Drainage Impact Assessment (SuDs Statement) prepared by MHL Consulting Engineers.

MD-GO-06

All proposals for development within the areas identified as being at risk of flooding will need to comply with Flood Risk Objectives in Volume One, Chapter 11 'Water Management

Please refer to the Engineering Design Report prepared by MHL & Associates Ltd, Consulting Engineers which concludes that there were no water bodies identified as a source of flood waters that could potentially impact the site. To mitigate any risk, measures including compensatory flood storage, and attenuated surface water drainage have been proposed. These measures will remove the risk of flooding occurring within the development site.

MD-GO-07

Support and promote Middleton Town Centre as the primary and most appropriate location for the expansion of retail development. Protect the amenities of existing residential areas within the centre of the town and encourage the provision of sustainable new residential uses to strengthen the vitality of the town centre.

The proposed retail element (2 no. units) amounts to only 414sq.m and given its modest size is not considered likely to give rise to any potential impact on the viability or vitality of Middleton Town Centre. Retail is a permissible use under the Town Centre/Neighbourhood Centre zoning objective for the eastern portion of the site where it is proposed.

MD-GO-08

Support and promote Middleton as a sustainable employment centre. All proposals for employment related development shall be required to prepare and submit a mobility management plan that maximises the use of public transport options/ passenger rail services

A mobility management plan for the employment related development accompanies the application (prepared by MHL Consulting Engineers).

MD-GO-09

Protect and enhance the attractive landscape character setting of the town. Conserve and enhance the character of the town centre (including the special character of Architectural Conservation Areas) by protecting historic buildings, groups of buildings, the existing street pattern, historic laneways, zones of archaeological potential, plot size and scale while encouraging appropriate development in the town, including the development of regeneration areas and improving the public realm.

The proposed development makes use of existing buildings on the site and respects their established character and setting.

The proposed design of the new dwelling units, creche and café are based on a modern interpretation of traditional buildings forms and materials. These have been expressed in a contemporary way which respects the character of and is complimentary to the existing built environment.

MD-GO-12

Support the priority principles of the Midleton and Carrigtwohill Transportation Study published in August 2010 in a sustainable manner. In particular, it is an aim of this Plan to ensure that provision is made in proposals for new development, particularly for housing, office, retail, industrial and educational uses to provide safe, convenient and pleasant routes linking the development to the railway station and the other principal areas of the town for walkers and cyclists, based on the measures identified in the Midleton and Carrigtwohill Transportation Study. In achieving this objective, special attention should be paid to the layout of development to ensure that appropriate measures are taken to establish a walking and cycling friendly environment in accordance with the Cork Cycle Network Plan (2017). This plan also supports the principles and objectives of the Cork Metropolitan Area Transport Study (CMATS) that relate to Midleton and to the ongoing implementation of the Water-Rock Strategic Transport Study

The proposed development supports the priority principles of the Midleton and Carrigtwohill Transportation Study published in August 2010 in a sustainable manner and has had regard to the Cork Cycle Network Plan (2017), Cork Metropolitan Area Transport Study (CMATS) that relate to Midleton. There is safe and convenient walking and cycling access from the proposed development to

Midleton Train Station. Refer to the Mobility Management Plan prepared by MHL Consulting Engineers for details on same.

MD-GO-15

Protect river corridors having regard to the need to avoid disturbance to wintering birds and managing flood risk, and where possible, develop these as natural amenity corridors, connecting different parts of the town and linking up with established amenity areas. Development proposals should direct movement away from the estuary or incorporate screen planting or other suitable buffering to avoid potential for disturbance to birds. It is also an objective to provide adequate buffer zones along watercourses to ensure riparian zones are not degraded and there is no bankside erosion. In this regard, developers shall take account of relevant guidance documents relating to watercourse buffer zones, in particular IFI (Inland Fisheries Ireland) guidelines 'Planning for Development Watercourses in the Urban Environment'.

The West Ballynacora Stream runs to the north-east of the site, on the opposite side of Carney's Cross Roads. The proposed development has no impact on same from an ecological perspective in respect of riparian zones.

County Development Plan Objectives – East Cork MD: Specific Development Objectives for Midleton

Objective No.	Objective	Site Area (Ha)
MD-T-07	<p>To provide for a mixed-use neighbourhood centre with some retail, residential, commercial and community development in a form that respects the protected structures remaining on the site. Redevelopment of the site shall ensure the protection and reuse of the protected Maltings (Industrial Buildings) on site.</p> <p>Development of this site is contingent on the provision of flood relief works to the village of Ballinacurra and road improvements to Carneys Cross.</p>	2.8

The proposed development provides for a mixed-use neighbourhood centre with residential, retail, commercial and community development (café, creche, public open space) in a form that respects the protected structures remaining on the site.

Redevelopment of the site involves the protection and reuse of the protected Maltings (Industrial Buildings) on site.

Refer to the Site-Specific Flood Risk Assessment prepared by MHL Consulting Engineers which confirms that there is no flood risk.

The proposed development includes road improvements to Carneys Cross.

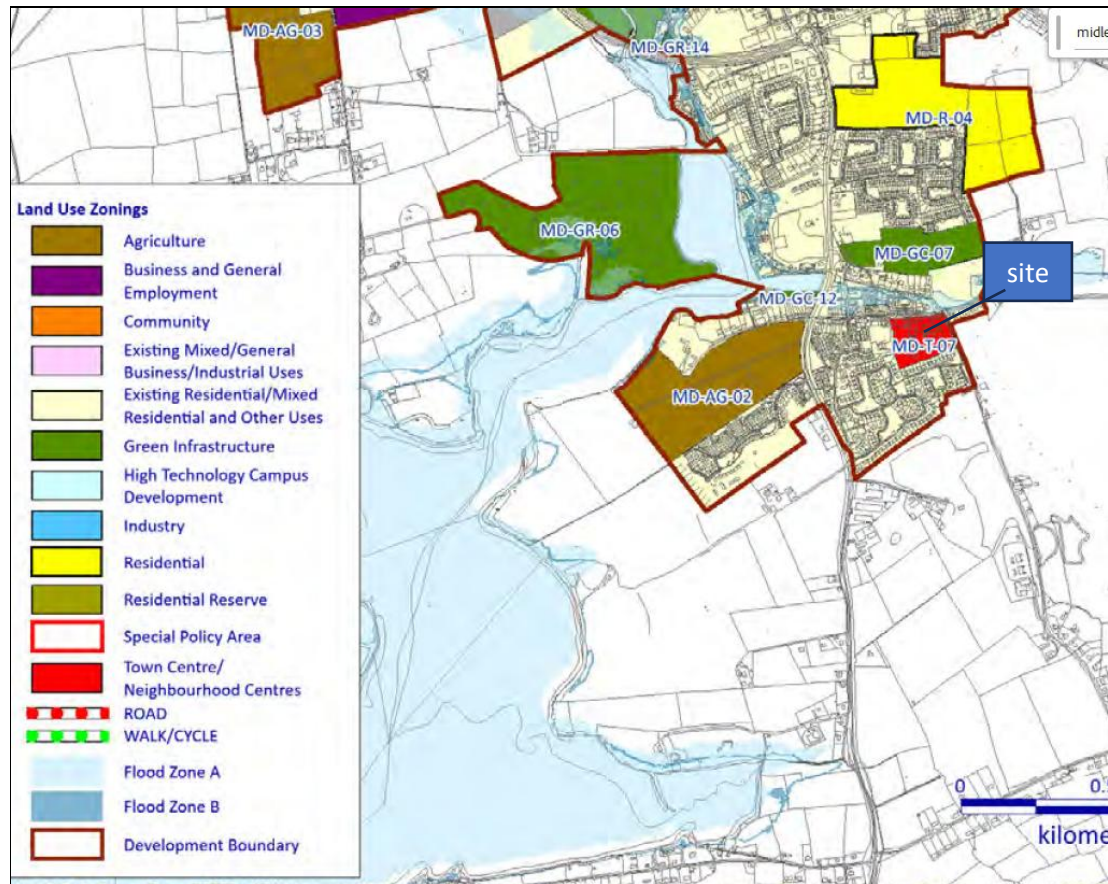


Fig No.30 Land use zoning map for the subject site.

Regeneration Areas

This plan identifies a number of areas which are either classified as 'town centre' or as part of the 'existing residential / business / other uses area' of the town, but merit additional guidance in the event that the opportunity to redevelop them emerges during the life time of the plan. It should also be noted that where a site is fully or even partially within an Architectural Conservation Area any development should give due consideration to these elements (s.3.3.22).

Regeneration Areas: Midleton	
Regeneration Area	Number and Description
	<p>MD-RA-03: Former Mill Buildings Ballinacurra</p> <p>This is an important site comprised of a mix of traditional and relatively modern buildings. Consideration should be given to the conversion of the principal traditional building on the site to other uses more compatible with the site's present surroundings.</p> <p>The development of a neighbourhood centre with some retail, residential and commercial may be suitable in a form that respects the traditional buildings remaining on the site. Development of this site is contingent on the provision of flood relief works to the village of Ballinacurra and road improvements to Carneys Cross.</p>

The majority of the site is included in MD-RA-03. We confirm that due consideration has been given to the conversion of the principal traditional building on the site to other uses more compatible with the site's present surroundings. Specifically, the mill building will be converted into a mix of residential and commercial uses.

The proposed development also reflects the neighbourhood centre aim for this site with a mixture of retail, residential and commercial uses proposed.

In relation to the flood relief works to the village of Ballinacurra we refer the Council to the flood risk assessment prepared by MHL Consulting Engineers.

In relation to the road improvements at Carneys Cross we note that the proposed development includes for new road improvements at this location.

Ballinacurra

Section 3.3.71 states that:

*The former Mill site in Ballinacurra has also been identified as a **site for neighbourhood centre uses** which could serve the Ballinacurra area (MD-T-07).*

The proposed development on the eastern portion of the site zoned Town Centre/Neighbourhood Centre includes for a mix of land uses typical of neighbourhood centre uses (residential, café, retail, office). The scheme has been designed in a manner so as to provide a new focal point in Ballinacurra with a central focus on this area of the site.

7.0 PRE-PLANNING

7.1 Pre-Planning Meeting Ref. No. PPE 22.605

A Section 247 LRD Pre application meeting in respect of a prospective development for **108 residential units** and commercial development by Scara Ventures Ltd at The Mill, Ballinacurra, Middleton was held on 14th December 2023. A copy of the draft layout that was submitted in advance of the meeting is outlined below. The subsequent s.32B pre-planning meeting outlined how the issues raised were addressed.



Fig No.31 Draft site layout plan submitted to Cork Co. Co. at pre-planning stage (s.247)

A second (s.32B) pre-planning meeting was held on 4th June 2025. A copy of the draft layout submitted in advance of that meeting is outlined below. It involved **121 no. dwellings** (94 no. new dwellings, 9 no. dwellings in existing structures, and

18 no. apartments), cafe and a crèche along with reuse of existing vacant mill buildings to provide 2 retail units, 1 medical unit, 1 office unit.

This led to a formal LRD Opinion from the Council which was issued on 1st August 2025. A response to the issues in this opinion is addressed in a separate document submitted with this application.



Fig No.32 Draft site layout plan submitted to Cork Co. Co. at second pre-planning stage (s.32B)

8.0 CONCLUSION

The applicant seeks permission for 128 dwelling units, a childcare facility, café and commercial units and ancillary development on brownfield lands measuring 3.63 hectares at the former Ballinacurra Mill Buildings (Protected Structure Ref. 523), Rosehill House (Protected Structure Ref. 520), and Eastville House (NIAH Ref. 20907636), Ballinacurra, Ballynacorra West, Midleton, Co. Cork.

The applicant has been prepared by a multi-disciplinary team of consultants engaged by the applicant.

A series of pre-planning meetings have taken place with Cork County Council in advance of the application as required under the relevant legislation.

- The subject site represents underutilised, brownfield lands close to Midleton town centre, train station and public transport (bus) which is where national, regional and local planning policy seeks to encourage residential development.
- The proposed land uses accord with the Residential and Town Centre/Neighbourhood zoning objectives for the site.
- The proposed development will bring about the regeneration of this long-term vacant site (Regeneration Site) as per the aims of the Cork CDP 2022-28.
- The proposed development provides new, long-term sustainable uses for the existing vacant structures of built heritage (including Protected Structures) on the site.

- The proposed residential density (43uph) accords with the 30-50 units per hectare recommended in the 2024 compact settlement planning guidelines.
- The lands are serviceable as confirmed by MHL Consulting Engineers following consultation with Uisce Eireann.
- The proposed new dwellings will deliver much needed housing supply options for Midleton/Ballinacurra and the surrounding area.
- A broad mix of housing types is provided for including 53% smaller units which will facilitate first time buyers and those in the area looking to downsize.
- The proposed creche, café and commercial uses will deliver a neighbourhood centre for the site as sought in the Cork CDP 2022-28.
- There is an existing footpath and road connection to Ballinacurra village centre and into Midleton town centre. The proposed development will provide a new footpath to the north of the site which will improve connectivity into this existing infrastructure.
- The proposed land uses are compatible with the established residential development to the west, south and north (on opposite side of the public road).
- Careful consideration has been given to the existing residential amenity of the dwelling owners to the north west and west; the modest height of the proposed dwellings and distance from the houses means that there will be no material impact arising.
- Public open space provision at 13% of the site is above the minimum requirement and is suitably landscaped to ensure passive and active amenity along with biodiversity.

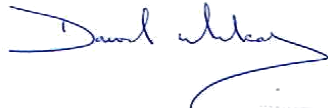
- The public open space will be passively supervised by new dwellings which front onto same.
- The Conservation Report has addressed the impact of the proposed development on the character and setting of the Protected Structures on the site, as well as Eastville House which is listed in the NIAH.
- The Historic Landscape Assessment has addressed the impact of the proposed development on the landscape associated with Rose Hill House (Protected Structure) within only modest development occurring in this part of the site.
- The Arboricultural impact Assessment notes that 33 existing trees (generally of low/moderate value) will be removed and the Landscape Plan demonstrates that this will be compensated for by the planting of 404 new trees of native species.
- The Traffic & Transportation Plan demonstrates that the traffic generated by the proposed development can be catered for by existing road infrastructure in the locality.
- All issues raised in the third party Road Safety Audit have been addressed.
- The Site Specific Flood Risk Assessment notes that there is no flood risk associated with the subject site.
- The preliminary Construction and Environmental Management Plan outlines measures to ensure no material impacts will arise to the environment during the construction phase and the applicant invites a condition for an updated version to be prepared when the contractor is appointed.

- The lighting plan outlines the location of all proposed new lighting and demonstrates that this will not have a material impact on any neighbouring dwelling owners in the area. The project ecologist has had regard to same in the ecological impact assessment.
- The landscape plan ensures that there is no conflict with engineering services or lighting infrastructure.
- An Archaeological Impact Assessment undertaken by an experienced archaeologist outlines a methodology for preserving industrial archaeology associated with the former mill and any potential subsurface archaeology during construction can be addressed by way of an appropriate condition requiring monitoring and industrial heritage items can be addressed by way of a survey prior to commencement of development when the site is made safe.
- The Ecological Impact Assessment which accompanies the application deems the site to be of low ecological value. The recommendations in relation to bats, kestrel and bee orchid will be adhered to. There is no evidence of any high -impact invasive species.
- The Appropriate Assessment Screening carried out for the proposed development has concluded that a Stage II Appropriate Assessment is required in the form of a Natura Impact Statement and this has been provided with mitigation measures outlined to ensure no potential impact to any Natura 2000 site.

Please refer to the Environmental Impact Screening Report prepared by O'Donnell Environmental Ltd which concludes that there is no requirement for a mandatory Environmental Impact Assessment and a sub-threshold EIA is not necessary as there is no likely significant effects on the environment.

In view of the above it is submitted that the proposed development would fully accord with national planning guidelines, the Cork County Development Plan 2022-28 and represents proper planning and sustainable development of the area.

Signed:



David Mulcahy

Ba. (Mod), MRUP, MSc Urban Design, MIPI, MRTPI

David Mulcahy Planning Consultants Ltd

CHARTERED PLANNING CONSULTANTS