

Cork City Council
Planning Department
City Hall
Cork
T12 T997

Thursday, 17th July, 2025
[By Hand]

Dear Sir/Madam,

RE: RESPONSE TO FURTHER INFORMATION REQUEST IN RELATION TO PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT ON LANDS ADJOINING THE ESB NETWORKS DAC OFFICE, FARRANDAHADORE MORE, SARSFIELD ROAD, WILTON, CORK CITY.

CCC REG. REF. 25/43819

1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, (Mathew House, Father Mathew Street, Cork) in association with Reddy Architecture + Urbanism and Mitchel McDermott Project Management, is instructed by our Client, the Land Development Agency to respond to the *Request for Further Information* issued by Cork City Council (CCC) on 16th June 2025.

The *Request for Further Information* (RFI) outlines 2 no. points, which would be required to be addressed in relation to the proposed development. These are outlined in greater detail below. This has been completed within the *Request For Further Information* closing date.

Please note that subsequent to the lodgement of the application, Tom Phillips + Associates (Agent to the Applicant) have moved offices, with our new office address being Mathew House, Father Mathew Street, Cork, T12 TN56. If any future correspondences in relation to this application could be forwarded to our new address that would be greatly appreciated, to ensure swift receipt.

This Response has been informed by advice from the multi-disciplinary design team appointed to the project, specifically:

- Tom Phillips + Associates (Town Planning Consultants);
- Reddy Architecture + Urbanism (Architects);
- GIA Consulting (Daylight and Sunlight Impact Assessment Specialists);
- Parkhood (Landscape Architects);
- O' Dwyer and Jones (Aviation Impact Specialists.)

TOWN PLANNING CONSULTANTS

As you are aware, the Land Development Agency is seeking to deliver much-needed, sustainable homes in a suitably located, sustainable setting, while ensuring compliance with the requirements of the Local Authority. This is summarised in Section 2.0 and addressed comprehensively in this Report.

2.0 EXECUTIVE SUMMARY

This Executive Summary provides an overview of how Item Nos. 1 and 2 of the *Further Information Request* issued by Cork City Council have been comprehensively addressed and satisfactorily resolved in respect of the proposed Large-Scale Residential Development (LRD) at Wilton, Cork City.

Item No. 1: Outer Public Safety Zone (PSZ) and Airport Safeguarding

In response to the submission raised by the DAA/Cork Airport regarding the site's location within the Outer PSZ, the applicant undertook direct engagement with the DAA, culminating in a formal consultation meeting. An updated *Aeronautical Assessment Addendum* was prepared, demonstrating full compliance with ERM (2005) thresholds by employing an occupancy-based risk analysis consistent with methodologies previously accepted by the DAA. The assessment confirms that all half-hectare grid units fall below the 60 no. person occupancy threshold, and the proposed crèche lies outside the PSZ boundary.

The response also highlights the outdated nature of the ERM mapping and underscores the precedent for residential and institutional developments previously permitted within the Outer PSZ. Furthermore, the previously submitted *Noise Impact Assessment* supports compliance with internal noise standards, and the applicant confirms willingness to accept a condition securing the mitigation measures previously proposed therein.

The exceptional socio-economic importance of the scheme, delivering 348 no. urgently needed affordable and cost rental homes, also qualifies the development for consideration under the discretionary provisions of paragraph 6.2.3 of the ERM guidance. Accordingly, this item has been addressed in full.

Item No. 2: Northern Boundary Treatment and Daylight Impacts

Concerns raised by the adjoining landowner regarding the proposed boundary treatment to the northern boundary and associated resulting daylight impact have been carefully assessed. The design team considered the implications of substituting the proposed 2.4m paladin mesh fence with a solid boundary wall. Detailed analysis, including revised daylight/sunlight modelling, demonstrated that a solid wall would significantly reduce daylight availability to adjoining residential units, resulting in a poorer residential amenity and reduced compliance with BRE standards.

Accordingly, the retention of a visually permeable and secure paladin fence is maintained as the preferred solution. This approach also avoids adverse impacts on existing trees and biodiversity along the northern boundary. Additional design refinements are included with this response, including enlarged fenestration and layout amendments, further optimise daylight performance across the scheme, achieving approximately 96% compliance with daylight standards. Accordingly, this item has also been addressed in full.

Conclusion

In conclusion, both items have been robustly addressed through technical analysis, stakeholder engagement, and appropriate design revisions. The scheme is considered compliant with the *Cork City Development Plan 2022–2028* and national planning policy objectives, and it is respectfully submitted that both items are now satisfactorily resolved. These items are addressed in full below and in the enclosed documentation.

3.0 FURTHER INFORMATION REQUEST ITEM NO. 1

Item No. 1 of the Further Information Request outlines that;

“It is noted that the site is located within the Outer Public Safety Zone for Cork Airport. Please be advised that the Planning Authority has received a submission from DAA/Cork Airport which raises concerns regarding the proposed density of the scheme relative to recommendations contained within the ERM Report Public Safety Zones 2005 (Table 6.1).

You are therefore requested to consult with the DAA/Cork Airport on this matter and following discussions submit a response and/or revised proposals to the Planning Authority in response to this item which satisfactorily addresses the matters raised.”

Accordingly, the Applicant engaged with representatives of DAA/Cork Airport via email on the 18th of June 2025 to initiate this consultation. The email thread of this is attached to this letter as Appendix A. An information pack, prepared by O’Dwyer and Jones Aviation Consultants, in collaboration with Reddy Architecture + Urbanism was forwarded in advance of the meeting. This was discussed with representatives from DAA/Cork Airport via an MS Teams Meeting on 4th July 2025, including DAA/Cork Airport personnel, Tom Phillips + Associates, Reddy Architecture + Urbanism and O’Dwyer and Jones Aviation Consultants, with the Applicant, the Land Development Agency also present.

Please find attached the O’Dwyer and Jones advice note in relation to this RFI item attached, as discussed at the meeting, this is enclosed as Appendix B.

3.1 Occupancy Methodology

As the Local Authority will be aware, a detailed *Aeronautical Assessment Report*, prepared by O’Dwyer and Jones, Aviation Consultants, was submitted with the planning application at lodgement stage, prepared in accordance with best practice. This report acknowledged the Public Safety Zone (PSZ) mapping prepared by ERM and included in the *Cork City Development Plan 2022–2028*. Consideration has also been given to the fact that the Local Authority would have taken account of the relevant aviation safeguarding maps during the rezoning of the site for residential purposes, prior to the preparation of the current Development Plan in 2022.

The updated *Aeronautical Assessment Addendum*, which was discussed following consultation with DAA/Cork Airport, has utilised a comparable occupancy methodology to that previously accepted by the DAA in respect of a residential scheme located close to Dublin Airport, which subsequently received planning permission.

This population calculation approach has been used to demonstrate compliance again in this case. The enclosed *Addendum* provides detail on the methodology applied to calculating the occupancy of the subject site in line with ERM guidance. Accordingly, a grid-based approach has been employed to assess potential risk from aircraft operations.

A rectangular grid of 40m x 125m has been adopted to reflect the probable impact area of an aircraft crash. The grids are oriented on a north-south axis, broadly aligning with the typical flight path of aircraft operating in and out of Cork Airport. This orientation provides a realistic simulation of how a straying aircraft might approach the site. Grid placement has been carefully considered, in instances where apartment blocks are aligned end-on to a potential flight path, grid coverage begins approximately halfway into these structures. This allows for a reasonable estimation of the penetration distance of a typical aircraft in the event of an impact. Given the presence of large expanses of undeveloped land surrounding the site, the grid extends into these areas to the north and south, providing a comprehensive assessment across the site's context. Applying the methodology outlined in the supporting documentation, including occupancy considerations, the assessment demonstrates that all half-hectare grid units within the Outer Public Safety Zone (PSZ) accommodate fewer than 60 persons, as required. Importantly, the proposed creche is outside of the mapped PSZ, and is therefore also in compliance.

Accordingly, the proposed residential development at Wilton falls within the thresholds recommended by ERM in their 2005 Report, ensuring compliance with guidance for residential occupation in proximity to airport operations.

3.2 *ERM Public Safety Zone Mapping Relevancy*

Furthermore, we would again highlight, as per the previously submitted Aviation Assessment, that the ERM Public Safety Zone mapping dates from 2005, which has been in place for over 20 years, is now regarded as outdated by all stakeholders. Tom Phillips + Associates, together with other relevant stakeholders, have been actively engaging with the Department of Transport to advocate for a review and update of this mapping. **We note that should the Department of Transport update the Public Safety Zone mapping in line with accepted international best practice, such as that currently applied in the UK, the Wilton LRD site would no longer fall within the designated safety zone.** The previously submitted Assessment notes the following in Section 6.4 (iii);

“The UK criteria used by ERM in 2000-2005 have now been abandoned as out of date in the UK, where currently (as of October 2021) very much smaller standardized Zones – of no more than 1.5km maximum length – now apply at all UK airports which have more than 45,000 annual traffic movements.

The Public Safety Zones at Cork are now larger than those applying at much busier UK airports (such as at Heathrow and Gatwick). It is likely that a review of the Zones at Cork, Shannon & Dublin would give rise to a significant reduction in their size, with no PSZ reaching as far as the Wilton site.

It is also worth noting that the original ERM study did not take into account the unique topography of Cork Airport, which should have resulted in much shorter Public Safety Zones in locations where ground levels fall away from the airport by substantial amounts (i.e. by more than 100m height at the Wilton site)." [Our Emphasis]

This further supports the appropriateness of the site for residential development and reinforces the position that the proposed scheme is fully compliant with all relevant aeronautical and planning considerations.

3.3 Pattern of Permitted Development In The Area

We also again draw attention to the precedent set by both Cork City Council and An Coimisiún Pleanála, which have, since 2005, consistently permitted development within the Outer Public Safety Zones. These include major schemes such as the expansion of Cork University Hospital, the redevelopment of the Wilton Shopping Centre site, residential development at Eagle Valley, and numerous other planning permissions granted in the vicinity of Cork Airport. This established pattern of decision-making clearly reflects a pragmatic and proportionate interpretation of the ERM guidance in the local context.

3.4 Noise Impact Assessment

Following consideration of the foregoing, both in advance of and during the meeting with the Design Team, DAA/Cork Airport issued the attached correspondence to conclude the consultation process. This correspondence is enclosed as Appendix C. This letter notes;

"We appreciate the opportunity to engage directly and acknowledge the efforts made to demonstrate how the proposed scheme aligns with the guidance set out in the ERM Report Public Safety Zones (2005). As discussed, the ERM guidance remains a key reference point for assessing development proposals within the Outer Public Safety Zone (PSZ) of Cork Airport. In this regard, we recommend continued engagement with the Planning Authority to demonstrate how the proposed development appropriately balances public safety considerations with much needed housing provision, particularly in the context of a widespread housing shortage and the national priority to increase housing supply.

Following further review, we also note that a portion of the proposed development site falls within Noise Zone C of Cork Airport, as identified in Figure 10.33 on page 388 of the Cork City Development Plan 2022-2028 - Cork International Airport Safety Zones.

In the event that planning permission is granted, Cork Airport would request that all residential units located within this noise zone be insulated to a suitable standard to ensure appropriate internal noise levels for habitable space can be achieved and maintained in accordance with the Development Plan.” [Our emphasis]

In this regard, we note that a *Noise Impact Assessment*, prepared by Malone O'Regan Environmental Consultants, was submitted as part of the planning application, which DAA/Cork Airport may have not had full regard to in respect of their closing letter. Appropriate noise mitigation measures have already been integrated into the design of the proposed development in response to the findings of this assessment. The *Noise Impact Assessment* concludes that baseline noise monitoring confirms ambient noise levels across the site are consistent with the strategic noise maps, and that these are primarily influenced by road traffic in the surrounding area. We note only the westernmost extent of the subject site falls within this noise map associated with the airport.

Through the implementation of the acoustic design measures outlined in the report, the proposed development will achieve internal and external noise levels in accordance with the guidance set out in ProPG: Planning and Noise and BS 8233:2014, thereby ensuring a high standard of residential amenity for future occupants.

Accordingly, should the Local Authority be minded to grant planning permission for the proposed development, we would have no objection to the inclusion of a condition requiring that the development be carried out in accordance with the noise mitigation measures and recommendations set out in the previously submitted *Noise Impact Assessment* prepared by Malone O'Regan Environmental Consultants. In conclusion, we deem this request to be dealt with in full, please refer to the enclosed appendices A to C for further information.

3.5 Exceptions to Permitted Developments in the Outer PSZ

Notwithstanding the above evidence that we are in full compliance with the ERM Guidance, it is worth highlighting that the proposed LRD presents an exceptional socio-economic benefit that justifies consideration under the Outer PSZ Criteria as outlined in paragraph 6.2.3 of the ERM Report. This states;

“In most cases, the guidance given in Table 6.1 will be sufficient to identify whether a proposed development should be permitted in the outer PSZ. However, there may be cases, in exceptional circumstances, where it is judged that a development's socio-economic benefits (etc.) outweigh the 'safety risk', and that it is impractical for such a development to be located elsewhere.” [Our Emphasis]

As previously noted, the proposed development is to be delivered in the context of a national housing crisis, this development will provide 348 no. new homes, the vast majority of which are cost rental and cost affordable units, tenure types critically underrepresented in Cork City. As outlined in the planning application documentation submitted, at present, there is a stark shortage of affordable housing in Cork, particularly for middle-income households who are not eligible for social housing but are priced out of the private market.

The proposed scheme directly responds to this unmet demand, offering a secure, sustainable, and long-term rental solution in one of Cork's highest-demand urban areas. Wilton serves as a key employment hub for Cork City. The presence of major institutions such as CUH, UCC, and MTU, coupled with Wilton's young, highly educated population and limited rental supply, underscores the urgent need for accessible housing within walking distance of these employment centres. As outlined in national planning policy, the LDA is mandated under the Land Development Agency Act (2021) to deliver social and affordable housing in cities with populations over 150,000. The proposed scheme fully meets this obligation. Moreover, the delivery of affordable homes at this scale in Cork is a rare occurrence, making this scheme one of the only large-scale cost rental and affordable developments in the city to date.

In this context, and having regard to paragraph 6.2.3 of the ERM report, the socio-economic benefit of the Wilton LRD would qualify under this exception.

The unique suitability of this site, which was rezoned for residential development by Cork City Council in 2022, alongside the scheme's public benefit, renders this development a clear exceptional circumstance under the ERM criteria. This is notwithstanding the above demonstration of compliance with the ERM guidance. Accordingly, we believe that Further Information Request Item No. 1 has been addressed in full. Please refer to the enclosed appendices for further information.

4.0 FURTHER INFORMATION REQUEST ITEM NO. 2

Item No. 2 of the Further Information Request outlines that;

"Please note that a third party submission has been received from an adjoining landowner, Society of African Missions, SMA Fathers regarding the boundary treatment along the northern boundary of the site. The Planning Authority notes that all the apartment blocks are sited in very close proximity to the northern boundary of the site, with ground floor single aspect north facing residential units, and notes that some habitable rooms in the ground floor units do not meet the guidance for daylight. The site layout plan also details a retaining wall, and that there are units at ground level which are below the level of the carpark to the north.

The Planning Authority has concerns that the provision of a block/solid wall along the northern boundary would have an increased negative impact on residential amenity of future occupants, and result in more units having reduced daylight, and an unsatisfactory residential environment. Please submit revised drawings to address concerns in relation to the provision of acceptable boundary treatments and the need to balance same with the provision of acceptable residential amenity particularly to north facing single aspect units. Your response should include detailed cross sections through the proposed scheme and the land to the north, and should there be any changes to the boundary treatment, an updated daylight study shall be required.

Please note that alternative uses (i.e. bulky storage) should be considered for some units where daylight amenity standards are not met. Please also note that the design of dual aspect units should not impact negatively on the amenity of private open space areas of adjoining units."

Firstly, we note that only a limited number of third-party submissions were received in relation to the proposed development, with the sole observation from an adjoining landowner to the north, the Society of African Missions (SMA Fathers). Apart from this, the remaining submissions originated from prescribed statutory bodies.

We trust that this limited level of public comment reflects a general acceptance of the proposed scheme among the wider community. We respectfully submit that the development should be granted permission in the interests of the common good, particularly given that it will provide much-needed housing in a sustainable location, at a time of acute housing need.

4.1 Assessment of Existing and Proposed Boundary Treatments

Nevertheless, we have, through careful analysis, considered the above RFI Item in detail. The current boundary treatment along the northern boundary of the subject site constitutes a mesh fence. To the north of this, a tree lined avenue is present within the SMA site and that the SMA themselves then have a secondary paladin fence at this boundary. The trees are planted along a steeply sloping embankment adjoining the SMA access road, inside of their boundary fence. We note that this arrangement has been in-situ for considerable time, without issue.

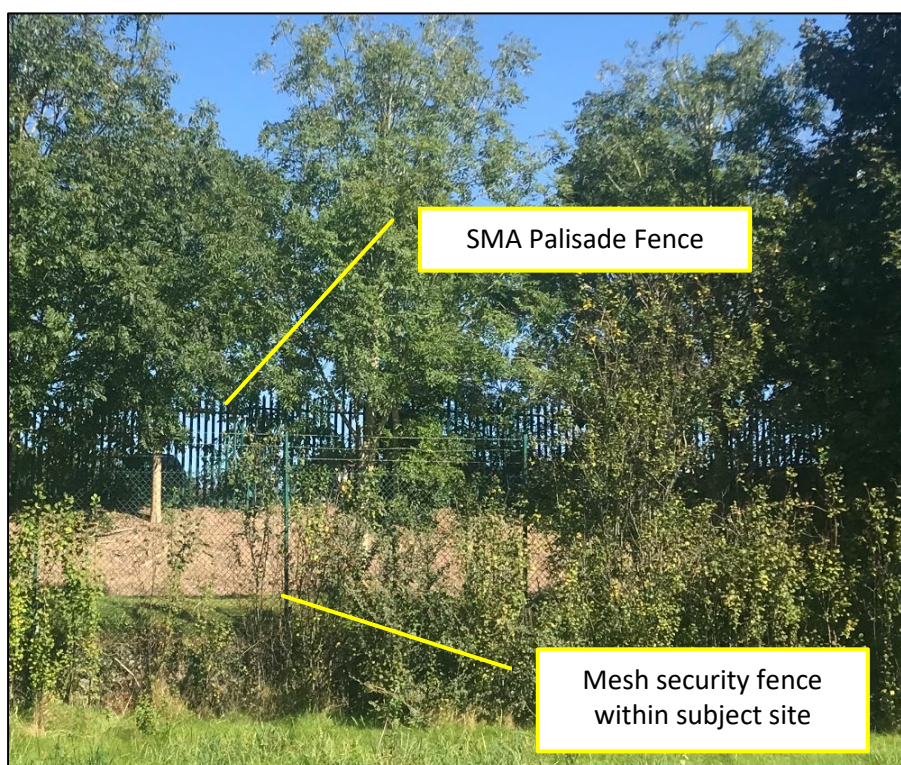


Figure 1.0 – Image of existing northern boundary treatments on site when viewed from inside the subject site, facing north. [Source: TPA 2023]

The request to amend the previously proposed boundary treatment has been carefully considered by the design team, with due regard to the potential implications of substituting the proposed replacement mesh fence with a block or solid wall along the full extent of the northern boundary. Particular attention was given to the impact such a change would have on the amenity of the adjoining proposed residential units to the south of this boundary, and to the wider scheme more broadly. A summary of this is provided below and overleaf, prepared by Reddy Architecture + Urbanism, the project architect;

“A comprehensive study has been undertaken by the design team to analyse the impact the introduction of a 2.4m high blockwork wall would have on the daylight for future residents of the northern units in the three apartment buildings, West, Middle and East.

*Firstly, from a landscaping and Ecological perspective, landscape architects Parkhood reviewed the impacts from the replacement of the paladin fence with a solid block wall. They would note that all of the existing trees which are outside of our site to the north are retained, which the Paladin fence facilitates. **Providing a wall along this boundary would require strip foundations. This would impact and sever the existing tree roots of those trees on the neighbouring property. The paladin fence with localised foundations reduces the impact along this boundary and allows for the retention and protection of the trees outside of our boundary. A wall will also restrict the growth of the new planting proposed on our side of the boundary. We would note also that the existing trees provide significant benefits including ecological, screening and noise reduction aspects.***

A further reason for proposing a secure, but more visually open boundary (2.4m paladin fencing) in this location is due to the northern aspect of the building and outlook for the apartments, covered more so under the daylight studies outlined below. If we were to have a full height walled boundary with the height of the retaining walling below same, this would be quite imposing given the proximity to the boundary. Parkhood’s recommendation is that the appropriate solution to this boundary is the proposed Paladin fencing providing a robust, secure boundary while allowing light through, replacing the unsightly and insecure conc. post and chain link fence there currently.

Secondly a comprehensive review of the boundary, northern units and daylight and sunlight was undertaken by Reddy Architecture and Urbanism and GIA, our Daylight and Sunlight Consultants.

The existing 2.4m high paladin fence was replaced with a 2.4m high solid wall in Reddy Architectures 3D site model. GIA then ran a new assessment and compared the proposed 2.4m high wall against the existing 2.4m high paladin fence scenario for each block. Please see attached detailed analysis; Daylight assessment in response to RFI prepared by GIA.

In conclusion, across the three blocks, the introduction of a solid wall on the northern boundary would have a significant impact on daylight to the ground and first floor units on the east and middle block. The western block currently has no shortfalls with all northern rooms exceeding guidelines. But the introduction of a wall will result in two Living/Kitchen/Dining rooms reducing from being BRE compliant, to only meeting the target for the living room, not one with a kitchen.

We therefore ask, that for the benefit of future residents of these homes, that a 2.4m wall not be considered to this northern boundary, and that the currently secure and robust paladin fence, with its associated planting is the best solution to ensure both the neighbours amenities and those of our proposed scheme."

4.2 Daylight and Sunlight Impact

The above referenced assessment was undertaken collaboratively by the project architect, Reddy Architecture + Urbanism, and GIA, the appointed consultants for daylight, sunlight, and shadow impact analysis. Accordingly, GIA have submitted a detailed comparison between the proposed 2.4m high paladin mesh fence and a 2.4m high solid boundary wall. The analysis indicates that the introduction of a solid boundary wall would result in a notable reduction in daylight levels across rooms in all three residential blocks, with some rooms experiencing a reduction of up to 50% compared to the paladin fence, as currently proposed.

In addition to this, where daylight deficiencies were identified in the initial assessment with the paladin fence, opportunities to enhance daylight performance have been explored, including:

- Middle Block: Increased window widths and separation of kitchen areas within the open-plan living/kitchen/dining (LKD) units at ground floor level.
- Eastern Block: Enlargement of fenestration to nine windows, distributed evenly across ground, first, and second floors.

Accordingly, GIA consider the proposed scheme to demonstrate excellent daylight performance for a largely apartment scheme with balconies. Incorporation of the proposed amendments, while maintaining the originally proposed boundary treatment, would further improve daylight quality, ensuring north-facing rooms comply with BRE guidelines and increasing overall compliance to approximately 96% (886 no. out of 924 no. rooms).

With a 2.4m high paladin fence, all north-facing rooms in the West Block meet or exceed BRE recommendations, providing satisfactory daylight amenity. The replacement of the paladin fence with a solid wall would significantly impact daylight levels to the ground floor of the West Block, causing two open-plan LKDs to fall short of the BRE kitchen daylight target. In the Middle Block, the paladin fence scenario results in all but two north-facing rooms meeting BRE standards. The introduction of a solid wall would halve daylight in these two LKDs and cause an additional nine rooms to fall below recommended levels. The proposed fenestration improvements would address these shortfalls, resulting in full BRE compliance for all north-facing habitable rooms.

Whilst we acknowledge the genuine request made by the adjoining landowner, it is important to note that implementation of the proposed boundary treatment would result in a demonstrable reduction in the quality of the scheme from a daylight and sunlight impact perspective, as demonstrated above and in the enclosed documentation. The originally proposed boundary treatment is consistent with the boundary currently in situ; however, it represents an upgrade in terms of design quality, materials, finishes, and visual impact. It is also more effectively integrated with the overall landscaping strategy.

Furthermore, if the request to redesign the boundary treatment was applied in full, it would necessitate design changes that would reduce the number of residential units deliverable on site, units which are urgently required in the context of the current housing crisis. In conclusion, the assessment demonstrates that the more permeable 2.4m high paladin mesh fence supports superior daylight conditions within the adjoining residential units compared to the suggested solid wall. The proposed design amendments to the fenestration, would further optimise daylight performance across the development, which we note were already satisfactory from a daylight and sunlight impact perspective.

4.3 Cork City Fire Department Submission

Updated architectural drawings have been prepared to note the above referenced fenestration changes, prepared by Reddy Architecture + Urbanism and are enclosed accordingly. These have been prepared while also considering a submission made by the Cork City Fire Department (received 26th June 2025, dated after the receipt of the *Request for Further Information*), should the Local Authority be minded to consider the suggested amendments made in that submission in addition. The Project Architect notes;

"In order to satisfy Part B building regulations and in preparation for the submission of a FSC, we have made some minor changes to the lobby / stair core configuration to the east block only. These include the addition of an escape door to the north façade, the reconfiguration of service risers in the lobby and the stair core access door. These alterations to the previously submitted drawings do not include any changes to apartment units themselves."

The enclosed drawing pack notes both the glazing changes following the GIA recommendations, and also the noted changes recommended by the project Fire Consultant, Jensen Hughes.

Accordingly, we consider that Further Information Request Item No. 2 has been fully addressed. We respectfully request that Cork City Council concurs with our assessment that any alteration to the proposed boundary treatment would result in a diminution of the overall quality of the scheme and the loss of residential units that are critically needed in the Wilton area. Please refer to the enclosed documentation for further information.

5.0 SUMMARY OF ENCLOSURES

Please find the following documentation enclosed in quadruplicate, as requested:

- Request for Further Information Response Report (this document) with associated Appendices, prepared by Tom Phillips + Associates
- Aviation Impact Assessment Briefing Note, prepared by O'Dwyer and Jones Aviation Consultants
- Daylight and Sunlight Impact Assessment – RFI Response, prepared by GIA,
- Updated Drawing Pack and Associated Document Schedule, prepared by Reddy Architecture + Urbanism.

6.0 CONCLUSION

This *Response to Request for Additional Information* provides a thorough and robust assessment and response to the Request issued by CCC. We contend that the proposed development represents an appropriate and acceptable response to the locational characteristics of the subject site and the specific requirements of the project.

On this basis, it is submitted that the scheme demonstrates compliance with the provisions of the *Cork City Development Plan 2022–2028*. Furthermore, the proposal constitutes a high-quality, sustainable development that aligns with both national and local policy objectives and supports the proper planning and sustainable development of the area. The scheme will deliver a much-needed housing, in full accordance with the noted zoning objective.

We trust that you find this Response in order. Please do not hesitate to contact the undersigned should any queries arise.

Yours sincerely,



Órla Casey

Associate

Tom Phillips + Associates



APPENDIX A – Email Correspondence with DAA/Cork Airport

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City
Date: Thursday 10 July 2025 11:24:30
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[10.07.2025 25_43819.pdf](#)

Morning Órla,

Please find attached a letter confirming the project team's engagement with daa/Cork Airport.

We hope this assists with your response to Item 1 of the Further Information Request issued by Cork City Council in relation to application Reg. Ref. 25/43819.

Apologies for the delay - the Managing Director in Cork had been on leave until yesterday.

Please don't hesitate to reach out if you need anything further.

Kind Regards,
Gary

Gary Mackin | Infrastructure
Planning Department

Document Classification: Class 1 - General

From: Órla [REDACTED]
Sent: Monday 7 July 2025 16:24
To: Gary Mackin [REDACTED]
Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]; Anthony Coakley [REDACTED]
O'Dwyer & Jones - Aviation Planning [REDACTED]; Paul Mulligan
[REDACTED]; Carl Wessels (CW) [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

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Many thanks for the update Gary, that is greatly appreciated.

Kind regards

Órla Casey
Associate

Tom Phillips + Associates
Town Planning Consultants

Our Cork office has moved. Please take note of our new address and phone number which is detailed below.



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Tom Phillips + Associates Limited. Registered in Ireland No. 353333, 80 Harcourt Street, Dublin 2, D02 F449.

From: Gary Mackin [REDACTED]

Sent: Monday 7 July 2025 16:23

To: Órla [REDACTED]

Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]; Anthony Coakley [REDACTED];
O'Dwyer & Jones - Aviation Planning [REDACTED]; Paul Mulligan

[REDACTED] Carl Wessels (CW) [REDACTED]

Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Afternoon Órla,

Thanks again for arranging Friday's call — I hope it was helpful.

Please find attached the digital copy of the Cork Airport Public Safety Zones in Google Earth format (KMZ), as requested.

I'm currently working to get the response letter signed off, though it's taking a bit longer than expected due to certain people being on leave.

I still aim to have it with you by Wednesday, if not sooner.

Talk soon.

Kind regards,
Gary

Gary Mackin | Infrastructure
Planning Department

From: Órla [REDACTED]
Sent: Friday 4 July 2025 11:52
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]; Gary Mackin [REDACTED]; Anthony Coakley [REDACTED]; O'Dwyer & Jones - Aviation Planning [REDACTED]; Paul Mulligan [REDACTED] Carl Wessels (CW) [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

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Carl, Gary

Many thanks for attending the meeting this morning to discuss the Wilton LRD Project in Cork City.

As discussed, we hope to respond to the Further Information Request next week.

We will await the letter from yourselves, as discussed. If you could also forward digital mapping that would be appreciated so we can save to our system here.

Enjoy the weekend.

Kind regards

Órla Casey

Associate

Tom Phillips + Associates

Town Planning Consultants

Our Cork office has moved. Please take note of our new address and phone number which is detailed below.



Contact

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From: Órla

Sent: Tuesday 1 July 2025 17:22

To: Planning-daa [REDACTED]

Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED] >; Gary Mackin [REDACTED]

Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Hi Carl

I've just issued that meeting request to yourself and Gary. It went to the planning@daa.ie email account, which I assume is your wider generic email, if you need me to forward to anyone else specifically please let me know.

As discussed, please find calculations and methodology document attached, prepared by O'Dwyer & Jones Design Partnership - Aviation Planning Consultants, who are the appointed specialists for the Land Development Agency in this regard.

ODJ will be on the call on Friday alongside ourselves and the project architect, Reddy A+U.

If you have any further queries in advance, please let me know.

Kind regards

Órla

Órla Casey
Associate

Tom Phillips + Associates
Town Planning Consultants

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Contact

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T +353 21 206 6596
[REDACTED]

Dublin

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From: Órla
Sent: Tuesday 1 July 2025 17:15
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED] James Donlon [REDACTED] Gary Mackin [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Hi Carl

Thanks for reverting on this. That time suits us, I can issue a teams invitation now and will circulate the calculations shortly.

Kind regards

Órla

Órla Casey

Associate

Tom Phillips + Associates

Town Planning Consultants

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From: Planning-daa [REDACTED]
Sent: Tuesday 1 July 2025 09:22
To: Órla [REDACTED] Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED] James Donlon [REDACTED] Gary Mackin [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Dear Órla,

Hope this email finds you well.

We are able to do the meeting on Friday from 11 to 12, hope this suits you too.

We are keen to review the calculations once they are provided to us.

Regards,
Carl Wessels (CW)



Carl Wessels | Infrastructure

Planning Department

E: [REDACTED]

T: +353 1 944 9655

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Dublin Airport, Swords, Co. Dublin, K67 X4X5, Ireland

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From: Órla [REDACTED]
Sent: Monday 30 June 2025 17:33
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]; Gary Mackin [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

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Dear Carl

Many thanks for your prompt response on this and for looping in the wider team.

Unfortunately, that time would not work, apologies for this. Would you be free late Thursday PM or anytime all day before 3pm on Friday?

Apologies for any inconvenience in this regard. I'm hoping to send across the requested calculations tomorrow so you can have them in advance of discussion.

Many thanks for cooperation so far.

Kind regards

Órla Casey

Associate

Tom Phillips + Associates

Town Planning Consultants

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From: Planning-daa [REDACTED]

Sent: Monday 30 June 2025 14:54

To: Órla [REDACTED]; Planning-daa [REDACTED]

Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]; Gary Mackin [REDACTED]

Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Dear Órla,

Hope you had a good weekend.

Regarding the Teams meeting, Gary Mackin (Cc'd in this email) are available on Thursday from 10 to 11 in the morning if that also suits you?

Regards,

Carl Wessels (CW)



Carl Wessels | Infrastructure

Planning Department

E: [REDACTED]

T: +353 1 944 9655

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Dublin Airport, Swords, Co. Dublin, K67 X4X5, Ireland

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From: Órla [REDACTED]
Sent: Monday 30 June 2025 10:07
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

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Hi Carl

Many thanks for sending that through. We have taken a look and I hope to issue you something on this shortly. Would you be free to discuss this week/asap in this regard? I can issue a teams meeting request if you could let me know availability.

Happy to discuss further.

Kind regards

Órla

Órla Casey

Associate

Tom Phillips + Associates

Town Planning Consultants

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From: Planning-daa [REDACTED]
Sent: Thursday 26 June 2025 14:28
To: Órla [REDACTED]; Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Dear Órla,

Thank you for your continued engagement on the Wilton LRD (Cork City Council Reg. Ref. 25/43819).

Further to your recent correspondence, we would appreciate clarification on a specific point regarding the methodology used in the Aeronautical Assessment Report prepared by O'Dwyer & Jones Design Partnership.

In Section 6.4(iii) of the report, the consultant concludes that the proposed development complies with the ERM Public Safety Zone (PSZ) Guidelines. However, the approach taken appears to differ from the methodology outlined in Section 6.2 of the ERM Guidelines, which states:

"The maximum density should be applied to any single half hectare within which the proposed development is located."

The assessment appears to apply a broader averaging approach, incorporating adjacent unoccupied areas to calculate an overall density across a larger area (3.85 ha), rather than assessing the maximum density within any single half-hectare within the development site that falls within the Outer PSZ.

For reference, I've attached an example of a residential development within the PSZ of Dublin Airport, where compliance with Section 6.2 of the ERM Guidelines was demonstrated by dividing the site into half-hectare grids and assessing each individually.

Ahead of our meeting, we would recommend that a similar approach be considered to confirm that the proposed Wilton LRD aligns with the methodology set out in the ERM Guidelines.

Please don't hesitate to get in touch if any further clarification is needed.

Regards,
Carl Wessels (CW)



Carl Wessels | Infrastructure

Planning Department

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From: Órla [REDACTED]
Sent: Tuesday 24 June 2025 16:55
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]; James Donlon [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

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Hi Carl

Hope you are keeping well.

I tried calling your line this afternoon and it went to voicemail. I am writing again to follow up on the below, apologies for the double email, we are under time pressure to respond to the RFI request from Cork City Council so any assistance with scheduling of the meeting would be greatly appreciated.

We are available at your earliest convenience.

Kind regards

Órla Casey
Associate

Tom Phillips + Associates
Town Planning Consultants

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From: Órla [REDACTED]
Sent: Monday 23 June 2025 14:09
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]

Subject: Re: DAA Submission in relation to Wilton LRD, Cork City

Hi Carl

Just checking before I forward anything across, did you review the report from O'Dwyer & Jones Design Partnership - Aviation Planning Consultants as a part of your submission? If not I can forward this information.

When would suit for a meeting, I assume Teams is preferable to in-person?

Thanks


Órla

Órla Casey
Associate

Tom Phillips + Associates

Town Planning Consultants

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From: Planning-daa [REDACTED]
Sent: Friday 20 June 2025 11:18
To: Órla [REDACTED] Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]
Subject: RE: DAA Submission in relation to Wilton LRD, Cork City

Dear Órla,

Hope this email finds you well.

Thank you for engaging with us and we will be happy to schedule a meeting with you to discuss the Wilton LRD, planning reg. ref. no. 25/43819)

Prior to the meeting, can you please send through information regarding the density levels of the proposed development?

In particular, we would appreciate it if you could demonstrate whether the density parameters outlined in the ERM Public Safety Zone Guidelines have been considered as part of this application, and how these have been addressed in the proposed design.

Regards,
Carl Wessels (CW)



Carl Wessels | Infrastructure

Planning Department

E: carl.wessels.cw@daa.ie



THREE The Green, Dublin Airport Central,
Dublin Airport, Swords, Co. Dublin, K67 X4X5, Ireland

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Document Classification: Class 1 - General

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Document Classification: Class 1 - General

Document Classification: Class 1 - General

From: Órla <orla@tpa.ie>
Sent: Wednesday 18 June 2025 10:14
To: Planning-daa [REDACTED]
Cc: Triona Walsh [REDACTED]
Subject: DAA Submission in relation to Wilton LRD, Cork City

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Dear Sir/Madam

I am writing to you in relation to the recent submission made by DAA (Carl Wessels) on behalf of Cork Airport in relation to Wilton LRD, Cork City, on behalf of our Client, The Land Development Agency (CCC Reg. Ref. 25/43819).

Subsequent to the submission made by DAA, Cork City Council have requested that we engage with DAA in relation to your submission. A copy of this further information request is attached for ease of reference. The FI notes that we are requested to consult with DAA/Cork Airport on this matter and following discussions submit a response to the Planning Authority which satisfactorily addresses the matters raised.

Accordingly, would it be possible to schedule a call with relevant personnel to discuss the submission?

We look forward to engaging with you on this.

Kind regards

Órla Casey
Associate

Tom Phillips + Associates
Town Planning Consultants

Our Cork office has moved. Please take note of our new address and phone number which is detailed below.



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APPENDIX B – O’Dwyer and Jones Aviation Assessment Addendum

**Addendum to the Aeronautical Assessment Report (dated Dec. '24)
re the proposed Large-Scale Residential Development
at Sarsfield Road, Wilton, Cork City**

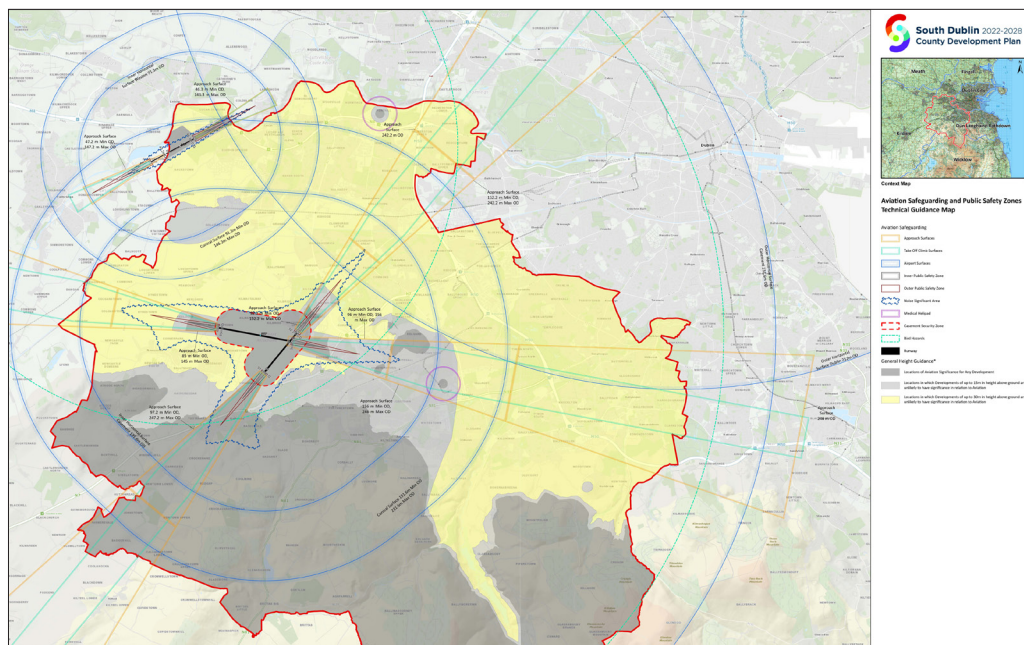
July 2025

- 1.1 This document addresses item #1 of Cork City Council's Request for Further Information dated 16th June 2025 in relation to planning application with reg. ref. no. 25/43819, which states:

"1. It is noted that the site is located within the Outer Public Safety Zone for Cork Airport. Please be advised that the Planning Authority has received a submission from DAA/Cork Airport which raises concerns regarding the proposed density of the scheme relative to recommendations contained within the ERM Report Public Safety Zones 2005 (Table 6.1).

You are therefore requested to consult with the DAA/Cork Airport on this matter and following discussions submit a response and/or revised proposals to the Planning Authority in response to this item which satisfactorily addresses the matters raised."

- 1.2 In this document we demonstrate – by reference to the ERM Report of 2005, and to data in other ERM documents – that the proposed LRD at Wilton is in compliance with the guidance contained in the ERM Report of 2005.
- 1.3 While the proposed LRD at Wilton complies with the ERM guidelines, we also advise caution in applying too literally the ERM criteria of 2005 for the following reasons:
- (i) There is no current international standard for Public Safety Zones around airports, and the Zones proposed by ERM in 2005 are currently the largest Public Safety Zones *at any airport worldwide*.
 - (ii) ERM acknowledged (in February 2005) that crash risk *"will reduce over time"* and recommended that the aircraft crash data used in its report *"should be periodically reviewed to judge their significance"* – and the Cork City Plan refers to *"policies **to be determined** by Government in relation to Public Safety Zones for Cork Airport"* – but in the 20 years since publication of the ERM study, no such review or updating of its PSZs has taken place.
 - (iii) The UK criteria used by ERM as a basis for its Study during 2000-2005 *has been deemed outdated in October 2021* by the UK Dept. for Transport, for the reason that these criteria no longer correspond with current aviation safety records.
 - (iv) The Public Safety Zones currently being applied at Cork Airport (of up to 11.29 km in length, are now *more than ten times larger* than the standardised Public Safety Zones currently being applied at all UK airports of similar size (i.e. having between 18,000 and 45,000 aircraft movements per annum), where the maximum length for Outer PSZs is now 1 km.



3. Engagement with DAA, & Grid Analysis Provided

- 3.1 In accordance with Cork City's request (in its RFI) that DAA be consulted on this matter, we confirm that there have been several engagements with DAA on this item, as follows:
- (i) Following a request made by the Wilton design team to DAA for a meeting on this item, DAA forwarded a sample grid analysis of the ERM recommendations that had been submitted for a previous residential development in Fingal; and
 - (ii) On receipt of that sample from DAA, we have prepared a Grid Analysis of the Wilton LRD in relation to the ERM recommendations of 2005, which was forwarded to DAA; and
 - (iii) A meeting was held on 4th July 2025 between the design team and DAA planners, at which compliance of the proposed LRD with the ERM recommendations was discussed.

3.2 Grid Analysis of Wilton LRD vis-a-vis ERM Recommendations:

Our grid analysis for the Wilton LRD (which was presented to and discussed with DAA) is shown on the following page.

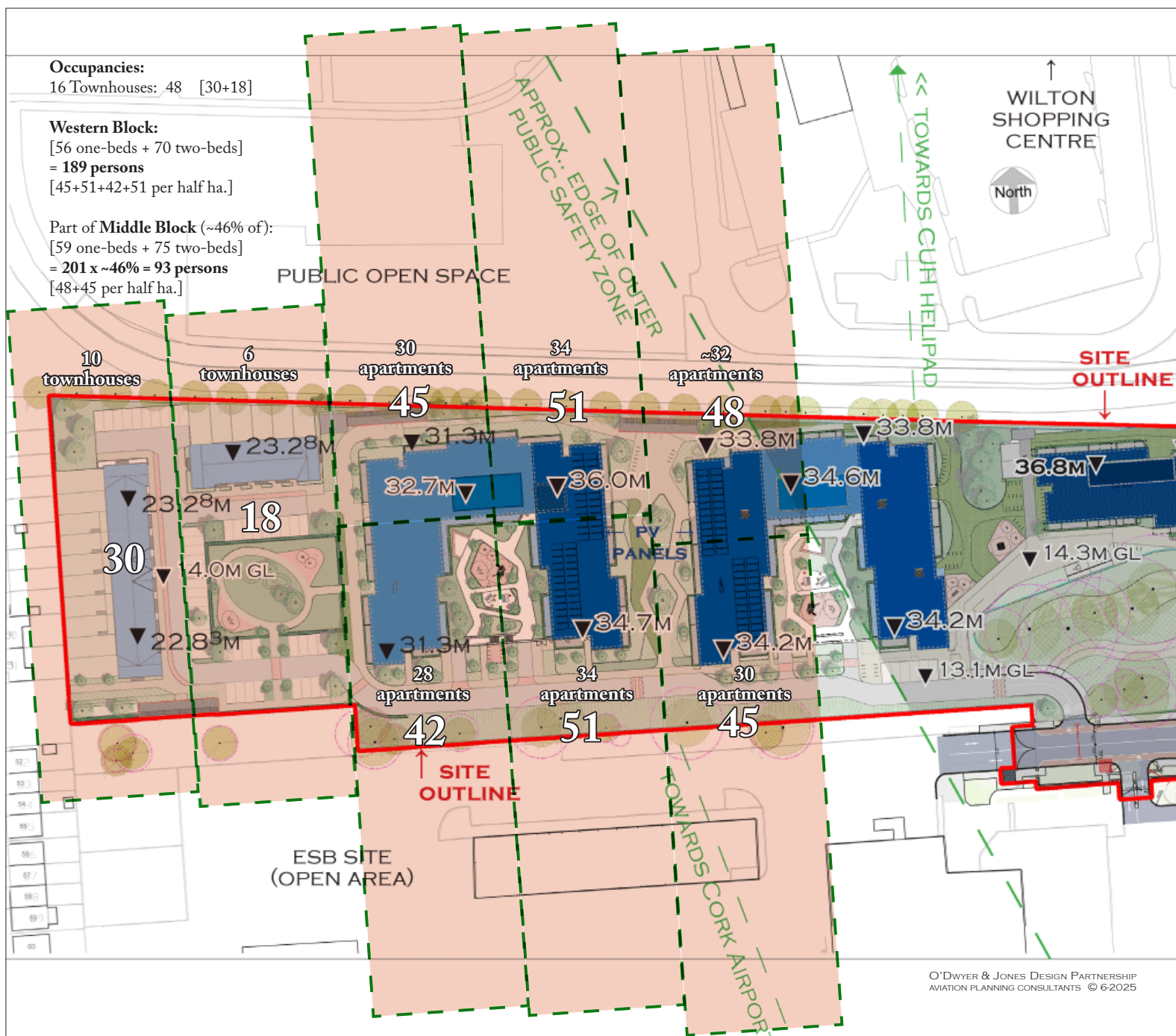
3.3 Rationale Applied – Grid Shape, Orientation, & Location:

- (i) Grid shape –
In this grid analysis, rectangular subdivisions of 40m x 125m are used (rather than squares of 71m x 71m) because a rectangular shape more closely represents a possible land area affected by an aircraft crash.
- (ii) Grid orientation –
These rectangles are oriented north-south, i.e. more-or-less in the direction of flight of a straying aircraft which might be off to one side of its flight path over Cork City.
- (iii) Grid location –
Where an apartment block lies end-on towards a potential flight direction, the rectangular grids start (and end) around half-way into these blocks in order to take into account a typical penetration distance (from either side) in the event of a crash by an aircraft of a typical size operating at Cork Airport. This applies at the western and middle apartment blocks of the LRD.
As the site is surrounded by very large areas of unoccupied land, the rectangular grids can extend into parts of these unoccupied lands, to the north and to the south of the LRD site at Wilton,

3.4 Grid Analysis of the Wilton LRD:

Applying the grid criteria outlined in our paragraph 3.3 above, and occupancy criteria which are explained in paragraph 3.5 on the following page, the drawing below shows the occupancy of the Wilton LRD per half-hectare grid., in the part of the site that lies within the Outer PSZ (along its eastern edge).

As these occupancies for the proposed LRD at Wilton are all below 60 persons in each half-hectare rectangle, they comply with ERM's recommendations for Residential Accommodation set out in Table 6.1 on page 40 of their report of 2005.



3.5 Occupancy Figures:

In assessing occupancies, ERM has stated (in para. F3.15.1 of its *Response to Public Submissions* dated 7 February 2005) that the relevant factor is “*the likely presence of people*”. Using this approach, the typical (or average) occupancy figures used for residential units (the same as were used in the sample provided by DAA) are one-and-a-half persons per one- and two-bedroom apartments.

The apartment blocks of the Wilton LRD all contain apartments of one and two bedrooms, and the occupancies in these blocks (as shown on the previous page) are calculated as follows:

For the **Western Block**, with 56 one-bed units, and 70 two-bed units, there is a typical occupancy figure of 189 for the whole block, subdivided into 45 & 51 & 42 & 51 persons within each of the four half-hectare grids which subdivide the western block.

For the **Middle Block**, with 59 one-bed units, and 75 two-bed units, there is a typical occupancy figure of 201 for the whole block. As less than half of that block lies within the Outer PSZ, we have estimated that around 46% of that overall occupancy, i.e. 93 persons, would constitute the typical occupancy of the part of the block that is within the Outer PSZ, and this figure of 93 persons is subdivided into 48 & 45 in its two half-hectare grids.

Occupancy figures used for the 16 **Townhouses** on the site are 3 persons per townhouse. Of these 48 persons, 30 are in one half-hectare grid and 18 in another half-hectare grid.

By this calculation the occupancy figures per half-hectare for the parts of the Wilton LRD which are within the Outer Public Safety Zone are:

18, 30, 42, 45, 45, 48, 51, & 51 —

which are in compliance with the recommended figure of 60 or less persons for residential accommodation in Table 6.1 of the ERM report.

3.6 Proposed Creche:

A Creche is proposed as part of the Wilton LRD. This will be located in the part of the Middle Block which lies outside all PSZs, so that it too will comply with ERM's recommendation (in Table 6.1 of its report) that there should be no new nurseries located within an Outer PSZ.

4. Additional Considerations in Assessing Compliance with ERM Guidelines

- 4.1 An additional consideration to be factored into an assessment of the compliance of the Wilton LRD with ERM's recommendations was discussed with DAA at the meeting on 4th July 2025.

This consideration was contained in paragraph 6.2.3 entitled ***Exceptions to Permitted Developments in the Outer PSZ***, on page 38 of the ERM report, which stated as follows:

In most cases, the guidance given in Table 6.1 will be sufficient to identify whether a proposed development should be permitted in the outer PSZ. However, there may be cases, in exceptional circumstances, where it is judged that a development's socio-economic benefits (etc.) outweigh the 'safety risk', and that it is impractical for such a development to be located elsewhere.

- 4.2 It is submitted that the Wilton LRD – a significant housing development by the Land Development Agency, during a national housing crisis – would fall into the category where the development's socio-economic benefit would outweigh the small safety risk that might arise at the very edge of an Outer Public Safety Zone and at more than 3 km from Cork Airport.

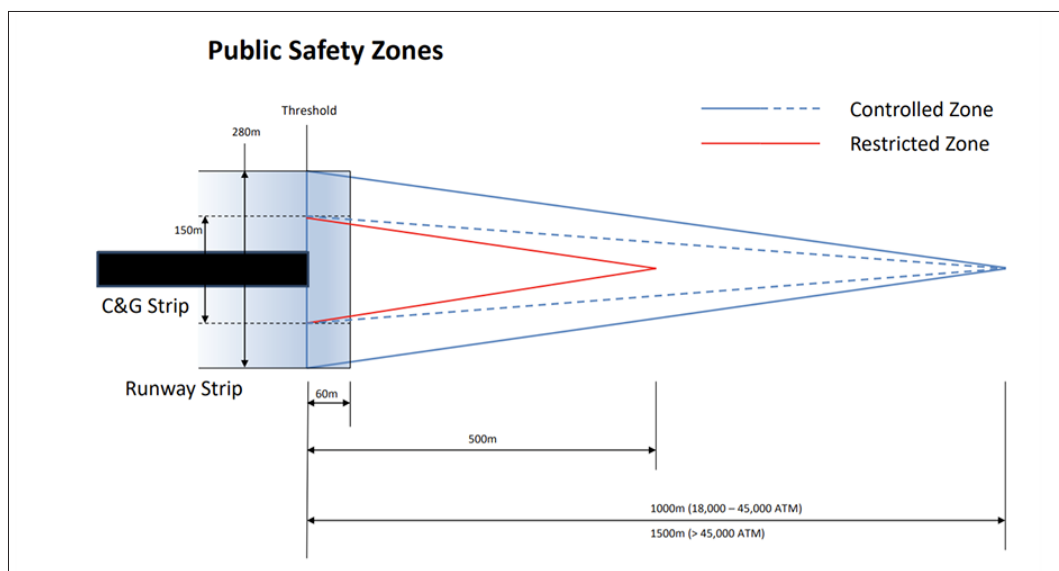
5. Current International Public Safety Zones Practice

- 5.1 While there are no international standards in regard to Public Safety Zones around airports, at the few airports or countries where PSZs are applied, these Zones have generally been subject to periodic review (e.g. every 7 years in the UK).

No such review or updating has been carried out in Ireland over the 20 years since ERM published its recommendations in 2005, and currently the Public Safety Zones around Dublin, Cork & Shannon are larger than any other Public Safety Zones *at any other similar airports worldwide*, and this should be borne in mind in any consideration of occupancies within these exceptionally large PSZs at Cork

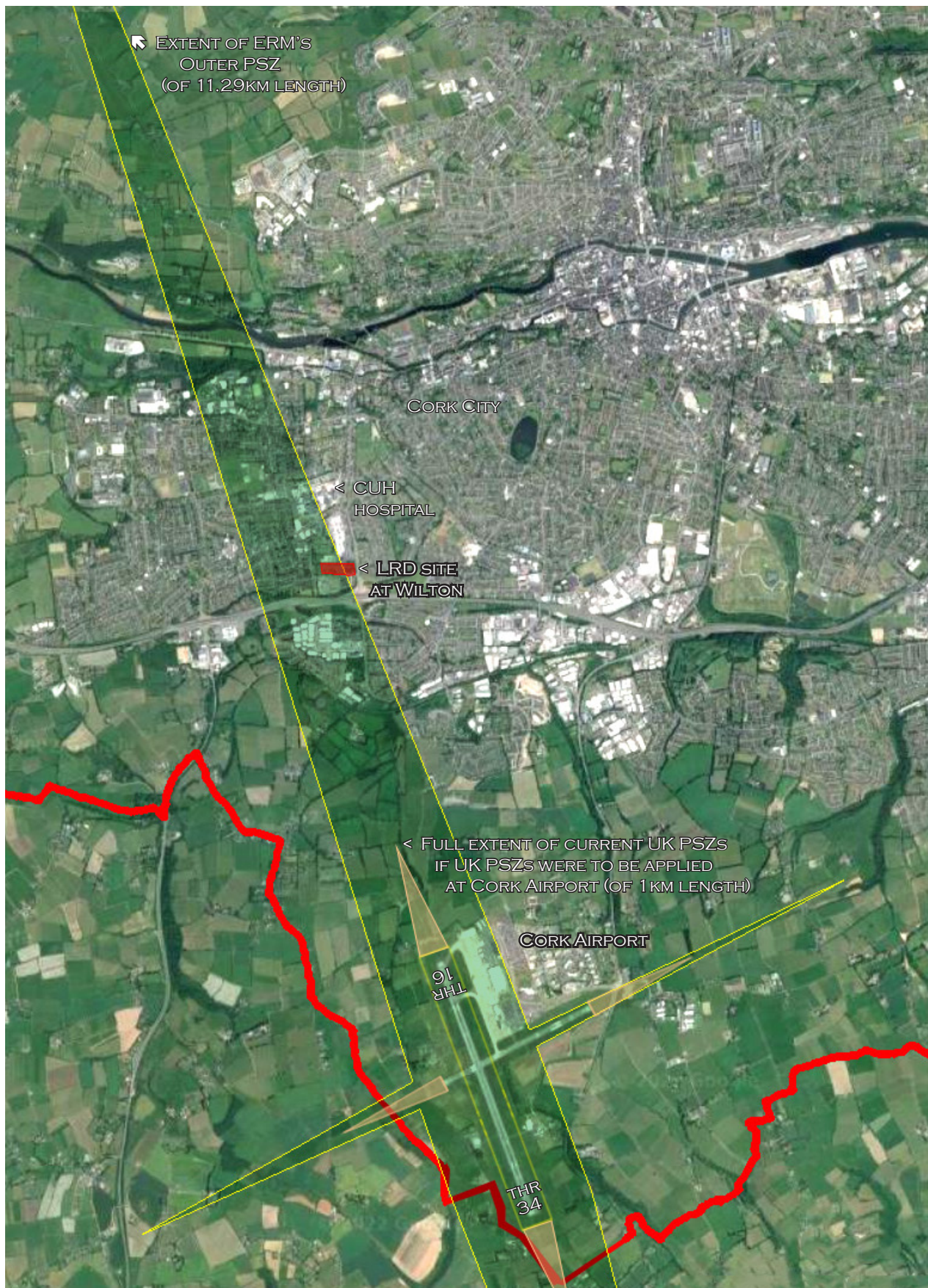
- 5.2 Significantly, in October 2021, the UK Department for Transport abandoned the same UK criteria which ERM had used from 2000-2005 in preparing its report (as stated on page 7 of ERM's 2005 report), on the grounds that aircraft crash statistics had improved significantly in the intervening years (but with no increase in commercial aircraft sizes, as had been expected by ERM).

Consequently, as of 8th October 2021, greatly reduced and standardised Public Safety Zones have been introduced at all UK airports. The UK government's diagram for these current UK PSZs is reproduced below, and it can be seen that the Outer Public Safety Zones (*in blue*) for the biggest UK airports (such as Heathrow and Gatwick) extend to no more than 1.5km from each runway threshold, and are of no greater width than the runway's "flight strip". This is *less than one-tenth the size* of Outer Public Safety Zones at Dublin Airport. For airports of Cork Airport size, the PSZs extend to no more than 1km i.e. *less than one-tenth the size* of ERM's Outer Public Safety Zones at Cork.



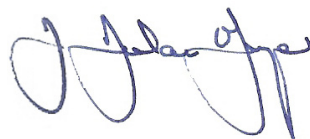
- 5.3 On the following page is an aerial view of Cork showing (*in grey*) the ERM PSZs, and (*in brown*) the full extent of the PSZs that would apply if the recently updated UK Zones were to be adopted at Cork Airport. It can be seen —
- (a) that the updated UK PSZs are a fraction the size of the ERM PSZs of 2005; and
 - (b) that Zones of current UK size would not reach anywhere near the Wilton site.

- 5.4 A comparative view of the extent of ERM's PSZs at Cork (*in grey*), with a plot of the full extent of PSZs of the size that now apply in the UK (*in pale brown*). –



6. SUMMARY

- 6.1 Application of ERM's Public Safety Zones recommendations vis-a-vis the proposed LRD at Wilton has been discussed with DAA, and these discussions have covered the topics that are included in this addendum report.
- 6.2 It is our view that the proposed LRD at Wilton complies with the recommendations of the ERM report of 2005 in regard to Public Safety Zones at Cork Airport, as demonstrated in our drawing on page 4.
- 6.3 It is also our view that the exception quoted by ERM (in its paragraph 6.2.3 on its page 38) applies to the proposed LRD at Wilton – i.e. that the socio-economic benefit of the proposed housing development for the LDA outweighs the safety aspect which might arise at the edge of an Outer Public Safety Zone more than 3 km from an airport.
- 6.4 Any consideration of the 20-year-old ERM proposals must be tempered by the fact that the Public Safety Zones proposed in the ERM Report of 2005 have become very much out of step with international practice, and the PSZs around Cork Airport are *more than ten times the size* of the standardised Public Safety Zones which now apply (as of October 2021) at all similar-sized UK airports (which have between 18,000 and 45,000 air traffic movements per annum).
- 6.5 We are satisfied that the proposed LRD at Wilton also complies with all other aviation and aeronautical requirements affecting its location.



J. Declan O'Dwyer B.Arch MBA RIBA

7th July 2025

*O'Dwyer & Jones Design Partnership
Aviation Planning Consultants*

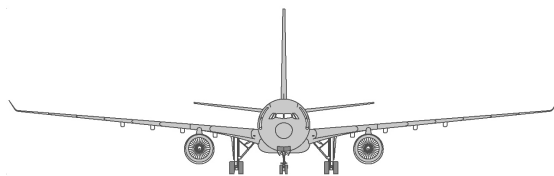
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APPENDIX C – Correspondence from DAA/Cork Airport



Órla Casey
Associate
Tom Phillips + Associates
Mathew House
Father Mathew Street
Cork
T12 TN56

Date: 10 July 2025

Reference Number: 25/43819

Site Location: Adjoining ESB Networks DAC, Office at Farrandahadore More, Sarsfield Road, Wilton Cork City

Dear Órla,

Thank you for arranging the meeting with daa/Cork Airport on Friday, 4th July 2025 to discuss the above-referenced application at Sarsfield Road, Wilton, Cork City.

We appreciate the opportunity to engage directly and acknowledge the efforts made to demonstrate how the proposed scheme aligns with the guidance set out in the ERM Report Public Safety Zones (2005). As discussed, the ERM guidance remains a key reference point for assessing development proposals within the Outer Public Safety Zone (PSZ) of Cork Airport.

In this regard, we recommend continued engagement with the Planning Authority to demonstrate how the proposed development appropriately balances public safety considerations with much needed housing provision, particularly in the context of a widespread housing shortage and the national priority to increase housing supply.

Following further review, we also note that a portion of the proposed development site falls within Noise Zone C of Cork Airport, as identified in Figure 10.33 on page 388 of the Cork City Development Plan 2022-2028 - *Cork International Airport Safety Zones*. In the event that planning permission is granted, Cork Airport would request that all residential units located within this noise zone be insulated to a suitable standard to ensure appropriate internal noise levels for habitable space can be achieved and maintained in accordance with the Development Plan.

Should you have any questions or queries, please do not hesitate to get in touch.

Yours Sincerely,

Gary Mackin
Senior Planner
(planning@daa.ie)