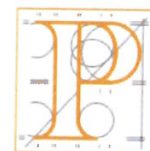


# Validation Checklist

Lodgement Number : **LDG-080282-25**  
Case Number: **ABP-322540-25**  
Customer: **Frank Heffernan**  
Lodgement Date: **15/05/2025 11:53:00**  
Validation Officer: **Dáire Littleton Caden**  
PA Name: **Cork County Council**  
PA Reg Ref: **246036**  
Case Type: **Appeal - LRD**  
Lodgement Type: **Appeal - LRD**



An  
Bord  
Pleanála

## LRD

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm PA Case Link	Confirmed-Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
3rd Party Acknowledgement	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes
Valid Lodgement Channel	Yes

3rd V Grant (LRD)(Digital File)

LRD01 to appellant with receipt

LRD05 to applicant + copy appeal

DIGITAL LRD07 to PA + copy appeal.



Lodgement Cover Sheet - LDG-080282-25

DD: 021386.25

Details

Lodgement Date	15/05/2025
Customer	Frank Heffernan
Lodgement Channel	Post
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Categorisation

Lodgement Type	Appeal - LRD
Section	Processing

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Paid	220.00 ✓ 3P
Refund Amount	

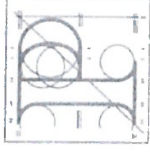
ABP: 322540-25

Run at: 15/05/2025 11:59

Run by: Anthony Kelly

LRD 3rd Party

\* DIGITAL FILE \*



An Bord Pleanála

Lodgement ID	LDG-080282-25
Map ID	
Created By	Anthony Kelly
Physical Items Included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	246036

DATE DECISION : 23-04-25 246036  
LAST DAY APPEALS : 20-05-25

PA Name	Cork County Council
Case Type (3rd Level Category)	

3rd Party

Observation/Objection Allowed?	
Payment	PMT-062945-25
Related Payment Details Record	PD-062791-25

LRD

LRD01 to appellant + receipt

LRD05 to applicant + copy appeal

DIGITAL LRD07 to PA + copy appeal

(PA notified by email 16/05/2025)



## Daragh Cassells

---

**From:** Daragh Cassells  
**Sent:** Friday 16 May 2025 10:29  
**To:** planninginfo@corkcoco.ie  
**Cc:** Dáire Littleton Caden  
**Subject:** APPEAL ; REF 246036 - ABP 322540-25

Hi

The Board has received a Third-Party Appeal for your planning reference number **246036** . ( **ABP-322540-25** ) This appeal was received by the Board on 15th May 2025.

In order for the Board to validate this appeal, can you please confirm the following;

1. Your date of decision
2. Full Development Description
3. If an EIAR was submitted with the planning application at any stage?
4. If an NIS was submitted with this planning application at any stage?
5. If this planning application is for an LRD (Large Residential Development) or if is for Normal Planning Application?

Regards  
Daragh Cassells



**AN BORD PLEANÁLA**  
 020 282-75  
 LDG-  
 ABP-  
 15 MAY 2025  
 Fee: € 220.00 Type: CO.  
 Time: By: RST

Frank Heffernan  
 7 Aldworth Heights  
 St. Joseph's Road.  
 Mallow,  
 Co. Cork  
 P51DK4V

An Bord Pleanála,  
 64 Marlborough Street,  
 Dublin 1,  
 D01 V902

15/5/2025

**Re: Application Ref: 24/06036 - Development Address:** Castlepark, Castlelands (Townland), St. Joseph's Road Mallow, Co. Cork

**Development Description:** A ten year Permission for the following Large Scale Residential Development (LRD) comprising of the construction of 469 no. residential units to include 305 no. dwelling houses (comprising a mix of 1,2,3 and 4 bed detached, semi-detached, townhouse/terraced and bungalow units) and 164 no. apartment/duplex units (comprising a mix of 1 and 2 bed units), 1 no. creche with a community room, part demolition and refurbishment of the former lodge to provide an interpretive centre and café and all associated ancillary development works.

**Location:** Castlepark, Castlelands(townland), St. Joseph's Road, Mallow, Co.Cork

**Planning Decision: Conditional Permission as of 23/04/2025**

A Chara,

Enclosed please find a third party appeal on the above conditional permission - planning decision as issued by Cork County Council. Contents include:-

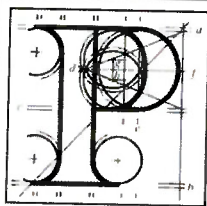
- Appeal Form duly completed
- Third Party Appeal Submission
- Please note that the submission includes:-
  1. Appendix 1 - List of local residents representing this third party appeal
  2. Appendix 2 - Copy of online submission acknowledgement by Cork County Council to myself.
  3. Cheque for 220 euros being a third party appeal fee requirement.

Mise le meas,

Frank Heffernan  
[frankheffernan2015@gmail.com](mailto:frankheffernan2015@gmail.com)







An  
Bord  
Pleanála

## Planning Appeal Form

### Your details

#### 1. Appellant's details (person making the appeal)

Your full details:

(a) Name

Frank Heffernan

(b) Address

7 Aldworth Heights, St. Joseph's Road, Mallow,  
Co. Cork. P51DK4V

[frankheffernan2015@gmail.com](mailto:frankheffernan2015@gmail.com)

### Agent's details

#### 2. Agent's details (if applicable)

If an agent is acting for you, please **also** provide their details below. If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's address

Click or tap here to enter text.

## Postal address for letters

3. During the appeal we will post information and items to you or to your agent.  
For this appeal, who should we write to? (Please tick ✓ one box only.)

You (the appellant) at the  
address in Part 1

☒

The agent at the address in  
Part 2

☐

## Details about the proposed development

4. Please provide details about the planning authority decision you wish to appeal. If you want, you can include a copy of the planning authority's decision as the appeal details.

**(a) Planning authority**

(for example: Ballytown City Council)

Cork County Council

**(b) Planning authority register reference number**

(for example: 18/0123)

24/06036

**(c) Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Ballytown)

Castlepark, Castlelands(townland)

St. Joseph's Road

Mallow

Co.Cork

## Appeal details

5. Please describe the grounds of your appeal (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

**Planning Application Reference Number:** 244519

**Applicant:** Reside (Castlepark) Ltd.

**Description of Development:** Permission for the construction of 99 no. residential units (comprising 95 no. 2-,3-,4- bed semi-detached house and townhouses and 4 no. 1- and 3-bed duplex/apartment units), creche and all associated ancillary site development works including vehicular access, parking, footpaths, drainage, amenity areas, and wastewater treatment plant. A Natura Impact Statement will be submitted to the planning authority with the application.

**Location:** Castlepark, Castlelands(townland), St. Joseph's Road, Mallow, Co.Cork

**Planning Decision:** Conditional Permission as of 10/2/2025

**See Attached Submission (x 1 copy) detailing the grounds of our third party appeal**

**1 x Online Submission Acknowledgement from Cork County Council is included in Attachment 2 of our submission**

Mise le Meas,



**Frank Heffernan**

**Secretary**

**St. Joseph's Road Residents Planning Group on behalf of:-**

**(See Table below)**

Electronic Signature	Address	
Kieran Duggan	St. Josephs Road	Mallow, Co. C
Elaine Comerford	St. Josephs Road	Mallow, Co. C
Patrick Martin O'Sullivan	St. Josephs Road	Mallow, Co. C
Denis O'Neill	St. Josephs Road	Mallow, Co. C
Denis Dunlea	St. Josephs Road	Mallow, Co. C
Nigel Sheehan	St. Josephs Road	Mallow, Co. C
Chrissie Lane	St. Josephs Road	Mallow, Co. C
Cathy Sexton	St. Josephs Road	Mallow, Co. C
Dijo Jose	St. Josephs Road	Mallow, Co. C
Sheila Buddle	St. Josephs Road	Mallow, Co. C
Philip Hayes	St. Josephs Road	Mallow, Co. C
Tom O'Reilly	St. Josephs Road	Mallow, Co. C
Kieran Shannon	St. Josephs Road	Mallow, Co. C
Electronic Signature	Address	
Linda Willis	St. Josephs Road	Mallow, Co. C
Noel O'Regan	St. Josephs Road	Mallow, Co. C
David O'Donoghue	St. Josephs Road	Mallow, Co. C
Ann O'Connor	St. Josephs Road	Mallow, Co. C
Ciara Ennis	St. Josephs Road	Mallow, Co. C
Paudie O' Callaghan	St. Josephs Road	Mallow, Co. C
Electronic Signature	Address	
Linda Daly	St. Josephs Road	Mallow, Co. C
Aoife Lehane	St. Josephs Road	Mallow, Co. C



James Kennedy	St. Josephs Road	Mallow, Co. C
Steve Murphy	St. Josephs Road	Mallow, Co. C
Eileen Horgan	St. Josephs Road	Mallow, Co. C
Pat O'Sullivan	St. Josephs Road	Mallow, Co. C
Jimmy Gyves	St. Josephs Road	Mallow, Co. C
Timothy Bowen	St. Josephs Road	Mallow, Co. C
End		

## Supporting material

6. If you wish you can include supporting materials with your appeal.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

## Acknowledgement from planning authority (third party appeals)

7. If you are making a third party appeal, you **must** include the acknowledgment document that the planning authority gave to you to confirm you made a submission to it.

## Fee

8. You **must** make sure that the correct fee is included with your appeal.  
You can find out the correct fee to include in our Fees and Charges Guide on our website.

## Oral hearing request

9. If you wish to request the Board to hold an oral hearing on your appeal, please tick the “yes, I wish to request an oral hearing” box below.

Please note you will have to pay an **additional non-refundable fee of €50**. You can find information on how to make this request on our website or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

**Yes, I wish to request an oral hearing**

☐

**No, I do not wish to request an oral hearing**

☐  
X

NALA has awarded this document its Plain English Mark

Last updated: April 2019.







**Frank Heffernan  
7 Aldworth Heights  
St. Joseph's Road.  
Mallow,  
Co. Cork  
P51DK4V**

**An Bord Pleanala,  
64 Marlborough Street,  
Dublin 1,  
D01 V902**

**15/5/2025**

**Re: Application Ref: 246036 - Development Address:** Castlepark, Castlelands (Townland), St. Joseph's Road Mallow, Co. Cork

**Development Description:** A ten year Permission for the following Large Scale Residential Development (LRD) comprising of the construction of 469 no. residential units to include 305 no. dwelling houses (comprising a mix of 1,2,3 and 4 bed detached, semi-detached, townhouse/terraced and bungalow units) and 164 no. apartment/duplex units (comprising a mix of 1 and 2 bed units), 1 no. creche with a community room, part demolition and refurbishment of the former lodge to provide an interpretive centre and café and all associated ancillary development works.

**A Chara,**

I write, on behalf of local residents of St. Joseph's Road, Mallow, Co. Cork, and associated existing estates, **as a third party appellant**, to present a comprehensive, detailed and quantitative submission on local residents' issues and concerns on the implications of **Conditional Permission Ref: 246036 - Reside (Castlepark) Ltd.**, proposed development of 469 no. residential units to include 305 no. dwelling houses (comprising a mix of 1,2,3 and 4 bed detached, semi-detached, townhouse/terraced and bungalow units) and 164 no. apartment/duplex units (comprising a mix of 1 and 2 bed units), 1 no. creche with a community room, part demolition and refurbishment of the former lodge to provide an interpretive centre and café and all associated ancillary development works at Castlepark, Castlelands (townland), St. Joseph's Road, Mallow, Co. Cork, for proper planning and sustainable development in our local area.

Local residents strongly feel that the proposed development is premature, and does not take into account all of the proposed other additional LRD's on St. Joseph's Road and Spa Glen, which will deliver upwards of a further 1350 plus dwellings in the local area. The resulting daily traffic density increases detailed within this submission will result in frequent traffic jams on St. Joseph's Road and Spa Glen not to mind gridlock on the south end of Mallow Town and within the town centre also. Indeed, local councillors have publicly stated that business trading in the town is down, as 40% of the local population shop and socialise outside of



Mallow, in Cork City and Kanturk, due to traffic density, gridlock and parking difficulties within Mallow town.

***Concurrent to this submission, residents of St. Joseph's Road and Aldworth Heights, (which includes myself),:-***

- Submitted a comprehensive consultation submission to Cork County Council with regard to local residents' concerns on short and medium term LRD's in the local area, in February 2023.
- Previously submitted observations to Cork County Council with regard to **Planning Application Reference Number: 244519 - Applicant: Reside (Castlepark) Ltd.**
- Subsequently submitted a third party appeal to An Bord Pleanála with regard to **Planning Application Reference Number: 244519 - Applicant: Reside (Castlepark) Ltd** in February 2025
- Have lodged a comprehensive document with An Bord Pleanála, on submissions and observations in relation to the implications of the proposed development for proper planning and sustainable development in the area concerned.....with regard to:- Section 177AE Notice - Proposed Development of 138 Residential Units and a Creche, on lands at Spa Glen, Mallow, Co. Cork -COMHAIRLE CHONTAE CORCAIGH - CORK COUNTY COUNCIL. NOTICE PURSUANT TO: SECTION 177AE OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED) AND THE REQUIREMENTS OF THE PLANNING AND DEVELOPMENT REGULATIONS 2001 (AS AMENDED). The proposed development consists of the construction of 138 residential units and a creche on a developable area of 3.79ha on a total site area of 5.26ha on lands at Spa Glen, Mallow, Co. Cork -. **Bord Pleanála Case Number 320648**
- Furthermore local residents submitted observations to Bord Pleanála on the proposed development in relation to the implications of the proposed development for proper planning and sustainable development in the area concerned.....with regard to *Bord Pleanála Case reference: LH04.320525 - Planning Authority Case Reference: 244243*. Unfortunately, this submission was lodged with An Bord Pleanála two days after the deadline date for submissions, so it will not be considered by An Bord Pleanála.

Local residents' core message in the above submissions focuses on their grave concerns on the lack of local infrastructure and amenities, unsafe, unsuitable and dangerous narrow local roads, very poor and unsafe footpaths, and no cycleways in the Saint Joseph's Road area. A further key concern of local residents is the reality of traffic gridlock if planners do not see the bigger picture and focus on integrated and strategic planning with regard to St. Joseph's Road and the Spa Glen area. This 3rd party appeal has a similar focus.

St. Joseph's Road currently lacks local community based services, community facilities and neighbourhood amenities, not to mind, the current realities of inadequate roads, poor and



unsafe pedestrian footpaths, no cycle paths, and no local public transport in the local St. Joseph's Road area.

The road is currently a danger to pedestrians and extremely dangerous for the very few cyclists who brave the road. Very few of the local residents in the area of the proposed development walk down to or up from Mallow Town given the reality of the steep hill on St. Joseph's Road. As for cyclists, it is a rare event to see any cyclist on the hill, except for hardened sports cyclists or the very rare ebike enthusiast. Indeed, local residents can state with confidence that 99% of residents are overly car dependent for local commuting and beyond.

What is very apparent within our previous submission is the reality that no further LRD's should be allowed on St. Joseph's Road or the Spa Glen area **until the Mallow Relief Road and associated local roads improvements are provided to alleviate local traffic in the area and enable Mallow Town to rise again as a vibrant and enterprising town.**

A timely and sensible report by Fingal County Council consolidates, in two paragraphs, local residents' issues and concerns with regard to the proposed LRD in Castle Park and associated other LRD's in the St. Joseph's Road and Spa Glen areas.

Fingal County Council's pivotal policy on LRD is highlighted in an Irish Times article on 31/8/2024 and reads as follows:-

***"However, the local authority said that in the delivery of its housing plan, it was not just about the provision of a roof over a person's head – it was also about "taking on projects with amenities and facilities that can serve new residents and existing communities as well." Matthew McAleese, Fingal's director of planning and strategic infrastructure, said: "To address the needs of our growing population, we're not only prioritising building new homes – and ensuring there's space for them – but we're looking to get this done with the necessary social infrastructure going in alongside."***

This is equally the pivotal thrust in our previous submission with regard to Application number 244519 and this current submission with regard to the proposed LRD.

This proposed LRD and indeed all other proposed LRD's in our local area should not just be about the provision of a roof over a person's head – they should also be about taking on projects with amenities and facilities, together with proper, safe and sufficient roads infrastructure that can serve new residents and existing communities as well, for walking, cycling and driving.

Thus a strategic planning approach should be taken by Cork County Council to progress the development and regeneration of the overall area as detailed in this submission, taking the area as a large-scale, strategic, site to increase the supply of housing and associated services, amenities etc., in the general area, thus, integrating the current and future LRD's and enabling a cohesive and integrated approach to planning and development. Whilst also taking into account how the integrated plans are designed to fit in with housing stock that already exists around them.



## **Integrated Approach/Strategic Planning - Quantum of Development - The Bigger Picture**

The proposed development is premature, and does not take into account proposed other short and medium term additional LRD's in the Spa Glen and St. Joseph's Road areas of Mallow, which will realise upwards of a further 1350 dwellings in the area. The resulting daily traffic density increases detailed within this submission will result in constant traffic jams in the Spa Glen and St. Joseph's Road areas, not to mention gridlock on the south end of Mallow Town.



**Map A - illustrates future LRD's in Spa Glen and St. Joseph's Road**

### **Legend:**

**Red Boundary - Cork County Council LRD (138 units)**

**Blue Boundary - O'Flynn Developments Spa Glen 1 Development (180 units)**

**Yellow Boundary - O'Flynn Developments Spa Glen 2 Development (400 units)**

**Green Boundary - Private Developer (100 units)**

**Orange Boundary - Future Private Developer (900 units) within 5 to 7 years**

**White Boundary - Application Ref: 246036 - Development Address: Castlepark, Castlelands (Townland), St. Joseph's Road Mallow, Co. Cork**

**Light Blue Boundary - Potential small scale, high density development**

**All of the areas shown are zoned for current and future housing LRD - over the next 1 to 7 years. (2025 to 2032).**

To achieve a good and balanced planning outcome, the planning application for the proposed Large Scale Residential Development at Castlepark, Castlelands (townland), St Joseph's Road, Mallow, Co. Cork should be considered together with all the proposed LRD's in the area as shown on Map A and planning reviews and decisions should be based on integrated, balanced, strategic and practical planning and development with key focus on local infrastructure, local services and amenities together with the provision of the Mallow Relief Road as a prerequisite to any proposed LRD in the area.





## **Strategic Planning**

<https://lda.ie/strategic-planning> refers

**The extract above refers:** Thus a strategic planning approach should be taken by Cork County Council to progress the development and regeneration of the overall area as detailed in map A above, taking the area as a large-scale, strategic, site to increase the supply of housing and associated services, amenities etc., in the general area, thus, integrating the current and future LRD's and enabling a cohesive and integrated approach to planning and development. Whilst also taking into account how the integrated plans are designed to fit in with existing development that already exists around them.

### **Further Observations**

- There is a crucial and immediate need for new roads to be constructed and existing roads to be upgraded before the development of additional housing anywhere in the St. Joseph's Road area.
- The provision of the Mallow Relief Road and its associated new local road connectivity are key essential requirements to support further LRD's in the local St. Joseph's Road area.
- There is a severe lack of general accessibility and connectivity for pedestrians and cyclists in the St. Joseph's Road area. Infrastructure improvements between the St. Joseph's Road residential areas and the town centre are an essential prerequisite to any future LRD's anywhere in the St. Joseph's Road area.
- Local public transport services are an immediate requirement. Ease of access to schools and to other essential services to enhance residents' quality of living are non-existent and are critical to any LRD in the Span Glen and St. Joseph's Road areas..
- The LRD as proposed, will create a further unacceptable traffic hazard, in the local St. Joseph's Road area, both at construction stage, by virtue of a large number of movements of heavy commercial vehicles delivering construction materials and general construction traffic, and thereafter by virtue of a high volume of vehicular traffic to and from the completed development, together with associated light and heavy commercial vehicles associated with domestic deliveries/collections.
- The construction of the development as proposed, will create noise, dust and vibration nuisance for a considerable period, in a manner excessively prejudicial to the residential amenity of existing and nearby residences.
- The Development, as proposed, lacks sufficient vehicular parking for the number of houses and apartments proposed. Cognisance has to be taken of the likelihood of such houses and apartments, if permitted, coming onto the private rented market which would result in four or more vehicles per house being utilised by multiple occupants. There is no capacity for so many extra vehicles and this would



inevitably lead to loss of parking amenity in the proposed estate itself. Footpaths will become parking spaces thus creating a traffic hazard for pedestrians. This problem already exists in other estates in the area.

- New and improved roads infrastructure, street lighting, safe pedestrian walkways, cycle paths, public transport, neighbourhood centres, quality local services and supports are a prerequisite to all future LRD in the St. Joseph's Road areas. All related new roads should be constructed and existing roads should be upgraded before the development of additional LRD's in St. Joseph's Road.
- The proposed development is contrary to the proper planning and sustainable development of the area.

**Having carefully reviewed Cork County Council's Cork County Development Plan 2022 and previous development plans, with regard to the: Proposed Large Scale Residential Development at Castlepark, Castlelands (townland), St Joseph's Road, Mallow, Co. Cork. Local residents feel that:-**

1. Density in a site location, (devoid of community amenities, neighbourhood centres, public transport etc.), and lack of proper infrastructure to support. (e.g. roads, safe pedestrian routes, cycle lanes, etc.), prerequisites in the Cork County Council Development plan 2022 to 2028, do not exist in the local St. Joseph's Road areas.
2. In line with 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, it is absolutely essential that the Mallow Relief Road and all related new roads be constructed and existing roads be upgraded before the development of additional LRD anywhere in the local St. Joseph's Road areas.
3. Given 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, the proposed development would endanger public safety in the St. Joseph's Road area by reason of traffic hazard, and would therefore be contrary to the proper planning and sustainable development of the area, due to current substandard and unsafe roads in the St. Joseph's Road Area..

**Additional observations include:-**

- The proposed LRD current development location, despite the land being zoned residential, would be overly car dependent, as the peripheral location within the outer area of the town, would leave all residents dependent on cars.
- The proposed LRD development location lacks alternative travel options and, consequently, would be against national, regional, and local policy on "compact growth and sustainable mobility". The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
- The current standard of St. Joseph's Road is poor and existing local vehicular traffic and non-local traffic densities are high. The St. Joseph's Road area has reached its



peak capacity, particularly at peak traffic times, and is not suitable for further LRD and its associated increase in traffic volumes.

- This clearly indicates that current traffic volumes from existing St. Joseph's Road estates and surrounds are above capacity for the area, with such capacity being at breaking point with the additional vehicular traffic using the road travelling to and from Fermoy/Mitchelstown and beyond. Commercial vehicles and private road users are using this local road on a daily basis. Such commercial vehicular traffic includes Light Weight/HGV/Articulated traffic.
- The town end of the St. Joseph's Road runs into a near cul-de-sac of a narrow laneway road, at the Clock Tower for all local and non-local traffic heading to Bridge Street and beyond. Not to mind St. Joseph's Road traffic gridlock at Bridewell Lane heading to the bridge, and at the Clock House T-Junction for vehicles heading to the town centre, via Muddy Hill and beyond. Local and non-local traffic volumes from Mallow Road/St. Joseph's Road into Bridge Street adds to traffic densities in the area. This results in high local and non-local traffic congestion at peak and off peak times for existing residents of St. Joseph's Road and associated surrounding estates, resulting in gridlock patterns on a daily basis at peak times.
- Looking at the broader area of the St. Joseph's Road, current and proposed housing LRD over the next two to three years, will further and greatly exacerbate traffic volumes, congestion and gridlock in the area. The key solution to this reality is the immediate provision of the Mallow Relief Road and associated local roads upgrading, together with local community amenities and supports, to enable current and future LRD housing in the area. The table and maps below support local residents' concerns.

## **Future Estimated Traffic Densities and Gridlock**

### **Legend:**

**SJR - St. Joseph's Road      SG = Spa Glen      HB - HazelBrook LRD**

**CP - Castle Park LRD      CCC - Cork County Council LRD**

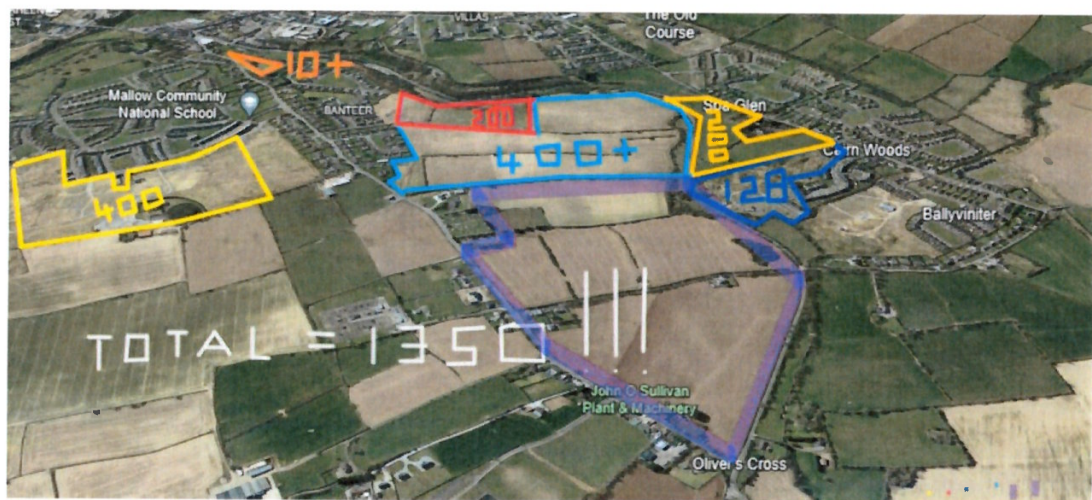
**OFD - O'Flynn Developments LRD**

**Colour Code:    Yellow - St. Joseph's Road Road      Red - Spa Glen Road**



Location	Density	1.5 Cars per House	2 Cars per House	Average Cars per House	Delivery Vehicles/ per day (10%)	Vehicles per Working Day	Direction Flow
SJR - CCC LRD	134	200	250	220	22	245	SJR 1500 Additional Vehicles per Day
SJR - OFD LRD 2	200	300	400	350	35	390	
SJR - CP LRD	450	675	900	790	80	870	
SG - OFD LRD 1	180	270	360	315	32	350	SG 980 Additional Vehicles per Day
SG2 - OFD LRD 2	200	300	400	350	35	380	
SG - HB LRD	130	195	260	228	23	250	
Totals	1294	1940	2570	2553	227	2480	2480

**Note:** These figures are additional to existing traffic volumes in the overall areas of Spa Glen and St. Joseph's Road. Note - Overall Average cars per house is circa 1.75

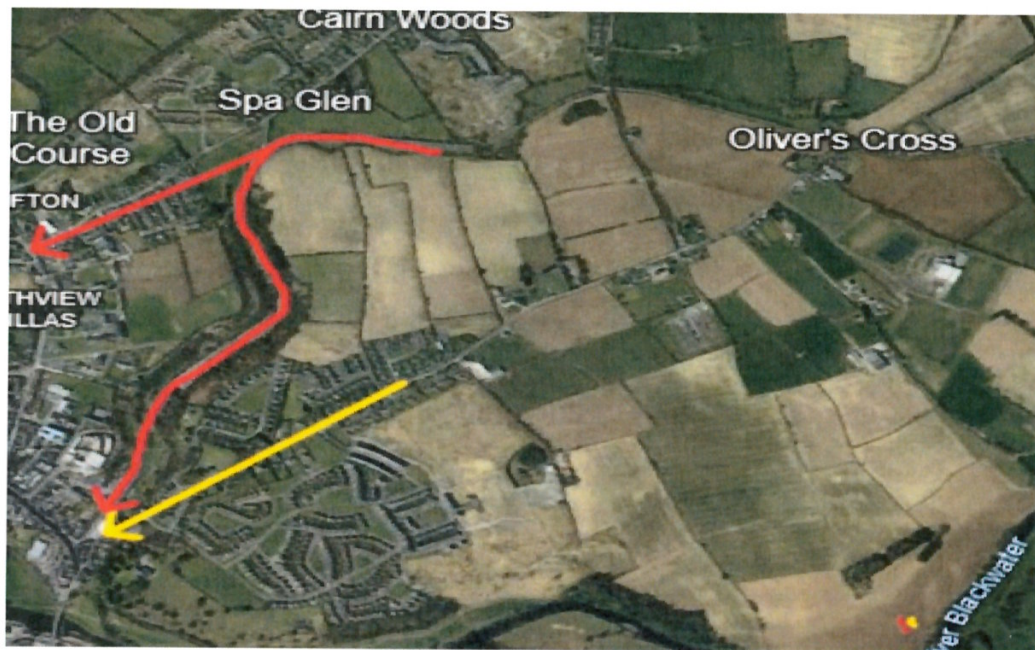


Upwards of 1350 Houses with upwards of 2480 vehicles, (on top of existing residential traffic, rat run traffic and delivery traffic), and nowhere to move! Gridlock!

**Note - I have not included traffic statistics for the subsequent future development of LRD in lands to Oliver's Cross Junction. (Purple area). This has potential for upwards of a further 900 dwellings and an additional 1500 vehicles!**



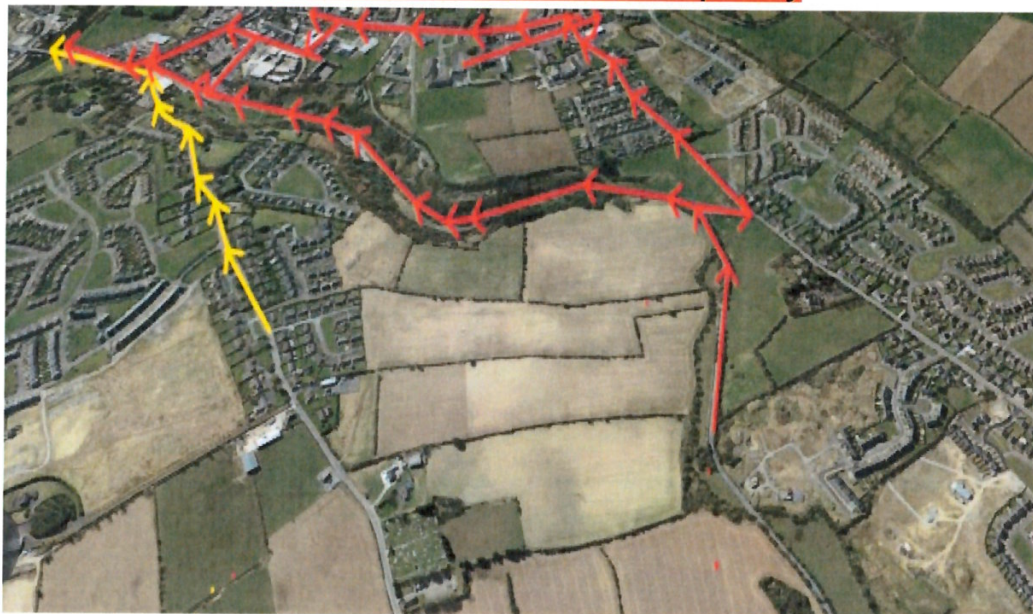




**Two Way Direction Flow Map-View 1**

**Yellow SJR Additional 1500 Vehicles per Day**

**Red SG Additional 980 Vehicles per Day**



**Two Way Direction Flow Map - View 2**

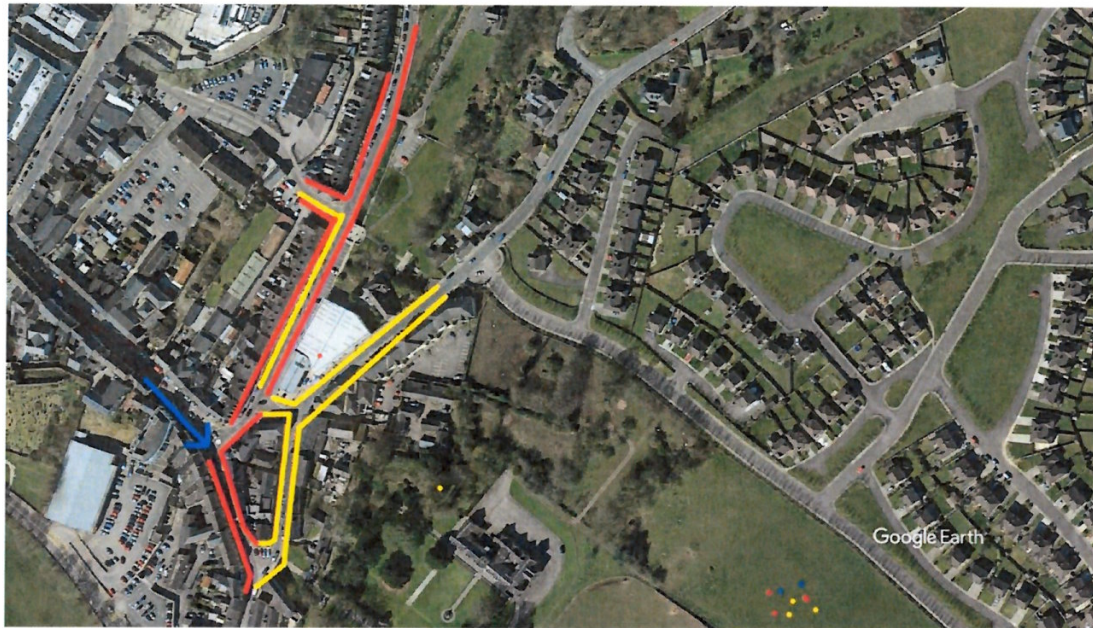
**Yellow SJR Additional 1500 Vehicles per Day**

**Red SG Additional 980 Vehicles per Day**

**Bottleneck Areas - St. Joseph's Road/Spa Glen/Bridge Street/Muddy Hill**

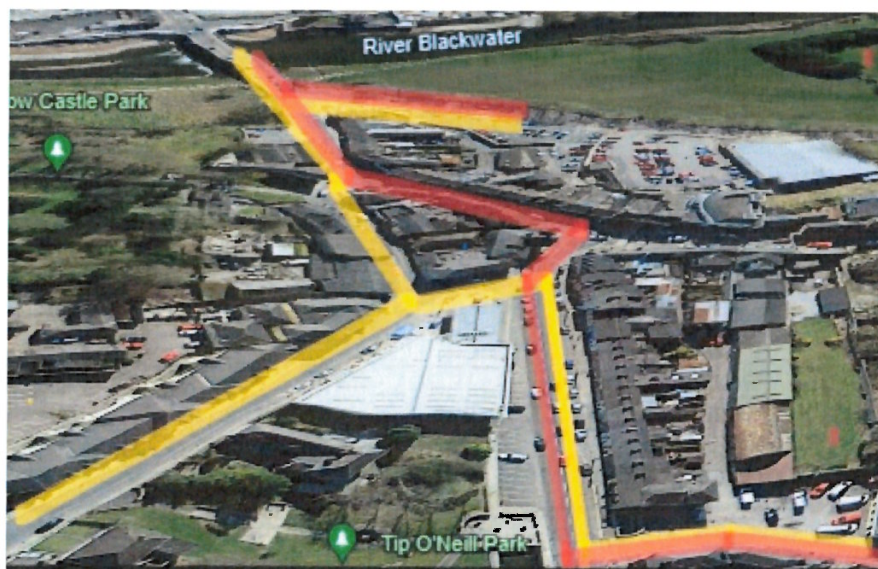






**Two Way Direction Flow Map - View 3**  
**Yellow SJR Additional 1500 Vehicles per Day**  
**Red SG Additional 980 Vehicles per Day**

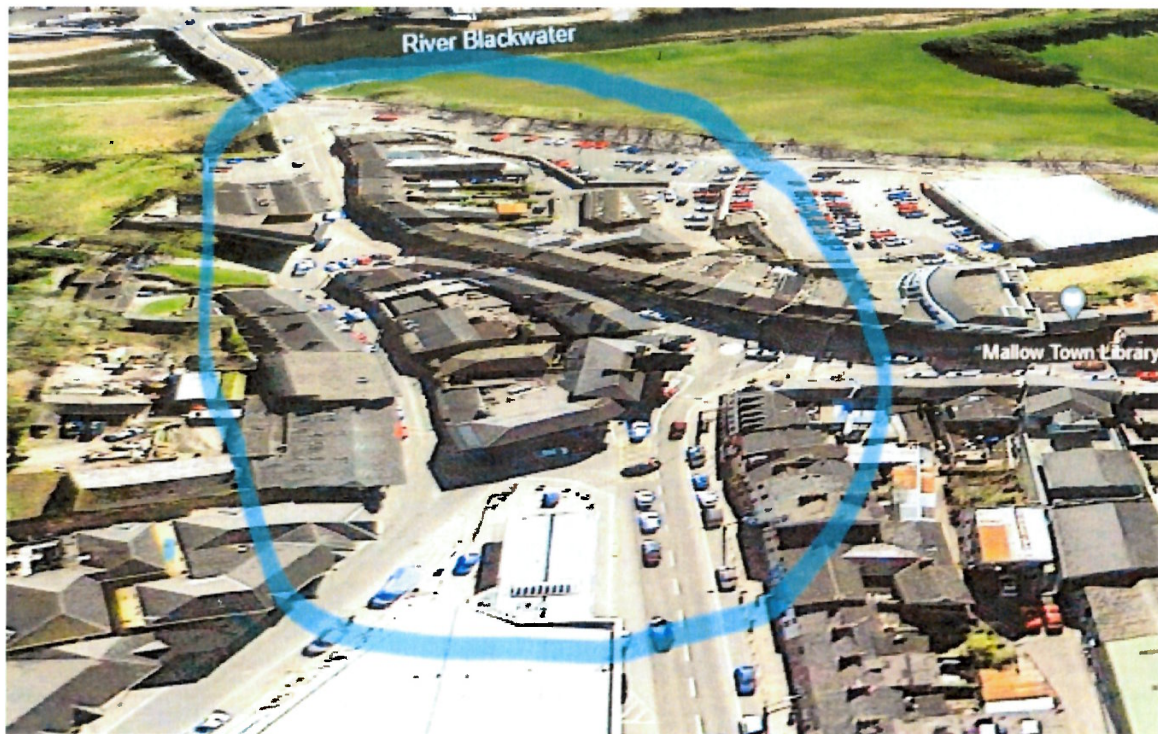
### Town End Maps



**Map 1 - 3D Town end of St. Joseph's Road/Spa Glen**  
**Yellow = St. Joseph's Road traffic flows, local and non-local**  
**Red = Spa Glen traffic flows local and non-local**  
**Blue = Main Street traffic flows local and non-local**







**Map 2 - 3D Town end of St. Joseph's Road/Spa Glen**

**Blue = Gridlock Area**

- The current road layout of St. Joseph's Road is not to the required road specifications and dimensions. The road is narrow, winding, with a pedestrian footpath at one side only for the most part, unsafe for pedestrian use, lacks proper street lighting, and is not suitable for additional road traffic which would result from further LRD's in Castle Park and the St. Joseph's Road areas.
- St. Joseph's Road is in dire and immediate need of reconstruction to meet the current traffic densities, requires widening/straightening, footpaths and cycle lanes on either side, thus providing safe access and egress for motorists, cyclists and pedestrians. The road also requires proper street lighting.
- **The Mallow relief road and associated new local road connectivity is an absolute prerequisite before any further LRD in the local St. Joseph's Road areas.**

### **Sustainable LRD in a Country Town - A Reflection**

- All previous development in the Castle Park area and indeed St. Joseph's Road area has been a mix of detached and semi-detached dwelling houses. This aim was to ensure a balanced enhancement within the overall area. There are apartments at the town end of St. Joseph's Road, incorporating The Gallery Bar and Restaurant, which adhere to the guidelines as shown below with reference to:-





**An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreacht**  
Department of Housing,  
Local Government and Heritage

## **Sustainable Urban Housing: Design Standards for New Apartments**

Guidelines for Planning Authorities issued under  
Section 28 of the Planning and Development Act,  
2000 (as amended)

July 2023

•  
**The Proposed Large Scale Residential Development at Castlepark, Castlelands (townland), St Joseph's Road, Mallow, Co. Cork includes a proposal for 164 apartments/duplex units and does not seem to adhere to many of the guidelines as set out below with regard to:-**

**The Department of Housing, Planning and Local Government's Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities**

**Section 2.0 Apartments and Statutory Development Plans is shown below.**

Please refer to local residents comments as detailed in the table below the extract copy of Section 2.0





## **2.0 Apartments and Statutory Development Plans**

### **Location**

- 2.1 To meet housing demand in Ireland, it is necessary to significantly increase supply. This is a key pillar of the overarching *Housing for All* Plan. The *National Planning Framework* targets increased housing supply in Ireland's cities and urban areas in particular. For the reasons outlined earlier, increased housing supply must include a dramatic increase in the provision of apartment development.
- 2.2 In general terms, apartments are most appropriately located within urban areas. As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services, are also particularly suited to apartments.
- 2.3 City and County Development Plans must appropriately reflect this, in the context of the need to both sustainably increase housing supply and to ensure that a greater proportion of housing development takes place within the existing built-up areas of Ireland's cities and towns. This means making provision for more residential development to take place on infill and brownfield sites and as refurbishment of existing buildings, to increase urban residential densities.
- 2.4 Identification of the types of location in cities and towns that may be suitable for apartment development, will be subject to local determination by the planning authority, having regard to the following broad description of proximity and accessibility considerations:

#### **1) Central and/or Accessible Urban Locations**

Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;
- Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.



The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

## **2) Intermediate Urban Locations**

Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly >45 dwellings per hectare net), including:

- Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.

The range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

## **3) Peripheral and/or Less Accessible Urban Locations**

Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including:

- Sites in suburban development areas that do not meet proximity or accessibility criteria;
- Sites in small towns or villages.

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

- 2.5 While the provision of apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages.



**Local Residents Comments:-**

Relevant Extracts from Section 2.0 Apartments and Statutory Development Plans	Local Residents Comments
2.1 To meet housing demand in Ireland, it is necessary to significantly increase supply. This is a key pillar of the overarching Rebuilding Ireland Housing Action Plan.	Agreed
2.2 In general terms, apartments are most appropriately located within urban areas. As with housing generally, the scale and extent of apartment development should increase in relation to proximity to core urban centres and other relevant factors. Existing public transport nodes or locations where high frequency public transport can be provided, that are close to locations of employment and a range of urban amenities including parks/waterfronts, shopping and other services, are also particularly suited to apartments	The site location is not an urban area, not a core urban area, does not have high frequency public transport, does not have amenities close nearby and is not close to locations of employment, for pedestrians and cyclists.
2.3 City and County Development Plans must appropriately reflect this, in the context of the need to both sustainably increase housing supply and to ensure that a greater proportion of housing development takes place within the existing built-up areas of Ireland's cities and towns. This means making provision for more residential development to take place on infill and brownfield sites and as refurbishment of existing buildings, to increase urban residential densities.	The proposed Castle Park LRD incorporating 164 apartments/duplex units does not adhere to 2.2 parameters as set out above.
2.4 Identification of the types of location in cities and towns that may be suitable for apartment development, will be subject to local determination by the planning authority, having regard to the following broad description of proximity and accessibility considerations:  1) Central and/or Accessible Urban Locations Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density	The proposed site location is not suitable.  The proposed site location is not central and/or accessible



<p>development (will also vary), that may wholly comprise apartments, including:</p> <ul style="list-style-type: none"> <li>• Sites within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;</li> <li>• Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and</li> <li>• Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.</li> </ul> <p>The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.</p>	<p>The proposed site location is a minimum walking distance of up to 20 minutes plus to Mallow Town centre, employment locations, that may include hospitals and third level/PLC locations.</p> <p>The proposed site location is a minimum of 35 to 40 mins from Mallow Railway Station.</p> <p>The proposed site location is a minimum of 20 mins to low frequency country bus services.</p> <p>The above planning factors were overlooked in substance and realities with regard to the proposed site location.</p>
<p>2) Intermediate Urban Locations Such locations are generally suitable for smaller-scale (will vary subject to location), higher density development that may wholly comprise apartments, or alternatively, medium-high density residential development of any scale that includes apartments to some extent (will also vary, but broadly &gt;45 dwellings per hectare net) including:</p> <ul style="list-style-type: none"> <li>• Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;</li> <li>• Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak</li> </ul>	<p>The proposed site location is not suitable.</p> <p>The proposed site location is a minimum walking distance of up to 20 minutes plus to Mallow Town centre, employment locations, that may include hospitals and third level/PLC locations.</p> <p>The proposed site location is a minimum of 35 to 40 mins from Mallow Railway Station.</p>





<p>hour frequency) urban bus services or where such services can be provided;</p> <ul style="list-style-type: none"> <li>• Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services.</li> </ul> <p>The range of locations is not exhaustive and will require local assessment that further considers these and other relevant planning factors.</p>	<p>The proposed site location is a minimum of 20 mins to low frequency country bus services.</p> <p>The above planning factors were overlooked in substance and realities with regard to the proposed site location.</p>
<p>3) Peripheral and/or Less Accessible Urban Locations Such locations are generally suitable for limited, very small-scale (will vary subject to location), higher density development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly &lt;45 dwellings per hectare net), including:</p> <ul style="list-style-type: none"> <li>• Sites in suburban development areas that do not meet proximity or accessibility criteria;</li> <li>• Sites in small towns or villages</li> </ul> <p>The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors</p>	<p>The proposed LRD is not the right fit and all the planning factors as listed, were overlooked in substance and realities with regard to the proposed site location.</p> <p>The proposed LRD of 305 dwelling units and 164 apartments/duplex units contradicts the planning factor of a minority of apartments. Apartments make up 35% of the proposed LRD.</p> <p>The proposed site does not meet proximity or accessibility criteria.</p> <p>The proposed site location is not suitable.</p>
<p>2.5 While the provision of apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages</p>	<p>Providing that a site meets proximity or accessibility criteria.</p> <p>The site for the proposed LRD does not meet proximity and accessibility criteria and the key planning factors in Section 2.0 Apartments and Statutory Development Plans have been overlooked by the developer.</p>
<p>2.13 This means that as well as being an overriding social issue, urban housing supply, especially the provision of</p>	<p>Mallow Town is a North Cork County Town and not a City.</p>



<p>apartments in our key cities, is a critical strategic competitiveness issue that statutory Development Plans must address.</p>	
<p>2.15 In accordance with Section 28 of the Planning and Development Act 2000, as amended, planning authorities must apply the standards set out as planning policy requirements in these guidelines, notwithstanding the objectives and requirements of development plans, local area plans and SDZ planning schemes.</p>	<p>The planning factors, as detailed above, were overlooked in substance and realities with regard to the proposed site location.</p> <p>The standards set out as planning policy requirements in these guidelines, notwithstanding the objectives and requirements of development plans, local area plans and SDZ planning schemes- were not applied to the proposed site location.</p>
<p>Housing Mix</p> <p>2.16 Apartment guidance to date has enabled statutory development plans to address different housing needs in different areas, as reflected in housing strategies, even within different parts of a large urban area. This may be applied based on parameters such as the projected demand profile for housing in an area and the desirability of providing for a range of dwelling types/sizes, having regard to the character of an existing mix of dwelling types in the area. In practice, this has not generally been the case.</p>	<p>Mallow Electoral Area is not a large Urban Area.</p> <p>The proposed LRD of 469 units has 305 houses and 164 apartments/duplex units. This contradicts the planning factor of a minority of apartments. Apartments make up 35% of the proposed LRD.</p> <p>Consequently, parameters such as the projected demand profile for housing in an area and the desirability of providing for a range of dwelling types/sizes, <b>having regard to the character of an existing mix of dwelling types in the area</b>, has been ignored by Cork County Council.</p> <p>Local residents on St. Joseph's Road feel that the proposed LRD in Castle Park with its mix of 305 houses and 164 apartments/duplex units <b>does not reflect a balanced enhancement approach to planning the LRD and does not reflect the local St. Joseph's Road area which</b></p>



	<p><b>is primarily composed of detached dwellings</b> with the exception of Castle Park which is currently an LRD of upwards of 600 houses - detached and semi detached.</p>
<p>4.16 Cycling provides a flexible, efficient and attractive transport option for urban living and these guidelines require that this transport mode is fully integrated into the design and operation of all new apartment development schemes. In particular, planning authorities must ensure that new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.</p>	<p>Please refer to this overall submission which details local realities of the topography of St. Joseph's Road given its steep ascent to the proposed site location, which 99% of cyclists find it impossible to climb.</p> <p>Very few locals walk St. Joseph's Road given its steep ascent and danger due to speeding traffic and rat run speeding non-local traffic.</p> <p>0.0001 of 1% cycle St. Joseph's Road and these are usually hardened long distance racing cyclist enthusiasts.</p> <p>There are no cycle lanes anywhere in the St. Joseph's Road area and indeed nowhere in the Mallow Electoral area.</p>

## **An Bille um Pleanáil agus Forbairt, 2023 - Planning and Development Bill 2023. SCHEDULE 4 - Section 390:**

**The proposed LRD in Castle Park of 305 houses and 164 apartments/duplex units contravenes: An Bille um Pleanáil agus Forbairt, 2023 - Planning and Development Bill 2023. SCHEDULE 4 - Section 390:**

**Relevant extracts supporting this submission/objection include:-**

1. Development of the kind proposed on the land would be premature by reference to any one or combination of the following constraints and the period within which the constraints involved may reasonably be expected to cease—

(e) any existing deficiency in the road network serving the area of the proposed development, including considerations of capacity, width, alignment, or the surface or structural condition of the pavement, which would render that network, or any part of it, unsuitable to carry the increased road traffic likely to result from the development,

(f) any prospective deficiency (including the considerations specified in clause (e)) in the road network serving the area of the proposed development which—



(i) would arise because of the increased road traffic likely to result from that development and from prospective development as regards which a grant of permission under Part 4 or Part III of the Act of 2000, or a notice under section 13 of the Act of 1990, section 192 of the Act of 2000 or section 393 exists, or

(ii) would arise because of the increased road traffic likely to result from that development and from any other prospective development or from any development objective, as indicated in the development plan, and would render that road network, or any part of it, unsuitable to carry the increased road traffic likely to result from the proposed development, or

(g) any existing or prospective deficiency in any infrastructure capacity which would be required to facilitate the proposed development.

2. Development of the kind proposed would be premature pending the determination by the planning authority or the road authority of any transportation or road layout for the area or any part thereof.

3. Development of the kind proposed would be premature by reference to the order of priority or phasing, if any, for development indicated in the development plan, urban area plan, priority area plan or coordinated area plan or pending the adoption of a development plan, urban area plan, priority area plan or coordinated area plan or any other plan which has been identified in the development plan, urban area plan, priority area plan or coordinated area plan.

4. The proposed development would endanger public safety by reason of traffic hazard or obstruction to road users, including to pedestrians and cyclists.

7. The proposed development, by itself or by the precedent which the grant of permission for it would set for other relevant development, would result in a traffic pattern which may adversely affect the use of a national road or other major road.

11. In the case of development including any structure or any addition to or extension of a structure, the structure, addition or extension would—

(b) seriously injure the residential amenities of property in the vicinity,

(c) tend to create any serious traffic congestion,.....

21. The development would contravene materially a development objective indicated in the development plan, including any objective for the carrying out of any specific project indicated in the development plan.

22. The proposed development would not be consistent with a planning scheme in force in respect of a strategic development zone (within the meaning of section 507).





23. The proposed development would not be consistent with the transport strategy of the National Transport Authority.

At this juncture, I wish to also include 6 different cases of refusal by An Bord Pleanála which individually and collectively highlight refusal grounds of a similar vein observations with regards to: Proposed Large Scale Residential Development at Castlepark, Castlelands (townland), St Joseph's Road, Mallow, Co. Cork:-

## **Bord Pleanála Cases - Refusal Reasons Precedents**

### **Case 1**

#### **Monkstown Housing Development Refused due to 'Substandard' Road Access**

**A planning application for 171 residential units in Monkstown was recently refused by An Bord Pleanála, with both the Board and the Planning Inspector citing poor access and substandard roads as their primary reasons for refusal.**

*The Planning Inspector, as part of recommending a decision, took a range of factors into account when coming to a final conclusion. These included matters on Urban Design, Visual Impact, Density and Traffic and Transportation, amongst others. In terms of access and connectivity, it was here that the Inspector found great issue with the design of the proposal, ultimately leading to a recommendation for refusal. It was their belief that "the proposed development would not be provided with an appropriate means of access and connectivity.*

*There was uncertainty regarding the timing and delivery of the local access road, which is the subject of an objective as part of the 2017 Local Area Plan. There was no commitment to the development of such a road and therefore the Board agreed that the scheme "would endanger public safety by reason of traffic hazard, and would therefore be contrary to the proper planning and sustainable development of the area". A final decision to refuse permission was thus reached.*

The current location for the proposed Castle Park LRD falls into a similar vein to the development in Case 1. Key similarities include:-

- matters on **Urban Design, Visual Impact, Density and Traffic and Transportation**, amongst others.
- **access to the site and the lack of road infrastructure** in place to cope with the new demand that would be created.



- “the proposed development would **not be provided with an appropriate means of access and connectivity**”
- uncertainty “regarding the **timing and delivery of the local access road**”,
- the scheme “would **endanger public safety by reason of traffic hazard**, and would therefore be contrary to the proper planning and sustainable development of the area”

## Case 2

Planning for 38 houses in west Mayo refused on appeal - A PROPOSAL to construct 38 houses at Carrowbaun, Westport, has been rejected by An Bord Pleanála.

*The board's inspector who considered the file recommended that permission be refused. They found the proposed development would constitute an insufficient level of density for this outer suburban location and would provide an inadequate variety of house types and sizes.*

*The report also found that it would provide a substandard form of development for future occupiers in terms of residential amenity, would give rise to a poor standard of development, and would seriously detract from the character and pattern of development in the area. It would be contrary to the proper planning and sustainable development of the area.*

The current location for the proposed Castle Park LRD falls into a similar vein to the development in Case 2.

Key similarities include:-

- proposed development would constitute an **insufficient level of density for this outer suburban location and would provide an inadequate variety of house types and sizes.**
- it would provide a **substandard form of development for future occupiers in terms of residential amenity, would give rise to a poor standard of development, and would seriously detract from the character and pattern of development in the area.**
- It would be **contrary to the proper planning and sustainable development of the area.**

## Case 3

**An Bord Pleanála refuses approval of Headford Road social housing**

*An Bord Pleanála refused planning permission for the development, despite the land being zoned residential, as it would be overly car dependent. The board said that*



***“peripheral location, the lack of adequate, safe pedestrian and cycle linkages, and adequate bus connections within the built up area of the city,” would leave residents dependent on cars.***

***The Board also stated that the lack of alternative travel options would be against national, regional, and local policy on “compact growth and sustainable mobility”. “The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”***

The current location for the proposed Castle Park LRD falls into a similar vein to the development in Case 3. Key similarities include:-

- despite the land being zoned residential, as it would be **overly car dependent**.
- **“peripheral location, the lack of adequate, safe pedestrian and cycle linkages, and adequate bus connections within the built up area of the city,” would leave residents dependent on cars.**
- the **lack of alternative travel options would be against national, regional, and local policy on “compact growth and sustainable mobility”.**
- proposed development would, therefore, be **contrary to the proper planning and sustainable development of the area.”**

**Further Bord Pleanála Refusal Precedents - Refer to Italic Text which details similar and parallel to St. Joseph's Road and Aldworth Heights Objections**

**Case A**

Planning permission refused for 1,000 homes in north Dublin

**Bord Pleanála ruled development planned for Baldoyle was excessive in scale and bulk**

AN BORD PLEANÁLA has refused planning permission to over 1,000 homes planned for Baldoyle in Dublin 13. In a separate reason for refusal, the appeals board pointed out that the Fingal County Development Plan ***requires that a minimum 10% of a proposed development site area be designed for use as open space.*** As a result, the appeals board concluded that the scheme ***contravenes the Fingal County Development Plan concerning the provision of open space to serve new developments.***

The appeals board also refused planning permission after concluding that the ***scheme would be deficient in terms of architectural design and would constitute an inappropriate overdevelopment of the site.*** The board found that the ***scheme would not provide an acceptable contribution to place-making and not respond appropriately to the surrounding environment.***



## Case B

In a separate planning refusal to an SHD planned for north Dublin, An Bord Pleanála has refused planning permission to Breffni Asset Holdings Ltd for 173 residential units for Coolquay Common.

In refusing planning permission, ***the appeals board had regard to the Rural Settlement Strategy of the Fingal Development Plan which states that future growth in commuter villages including Coolquay should be curtailed or safeguarded so that they do not act as a catalyst to facilitate unsustainable growth patterns.***

## Case C

Planning body recently overturned permission for 71 homes

An Bord Pleanála refused a number of housing developments in Galway, in recent weeks. Three developments around Galway were ***rejected for being too car-dependent.***

The reasons given for the refusal in the development at Keeraun was that they considered it to be ***piecemeal, with inadequate provision of social and physical infrastructure, and that such a development would be excessively car-dependent.*** An Bord Pleanála also refused the appeal due to the ***substandard condition of the roads in the area.*** "In the Headford Road case, again, the development was considered to be ***too car-dependent.***

## Applicant's Consultants Submissions

### Extract 1

## 4.2 Cork County Development Plan 2022-2028

Chapter 6 of the CDP 2022-2028 focuses on the provision and enhancement of social and community facilities, recognizing their pivotal role in fostering vibrant, sustainable communities. These facilities are essential for improving quality of life, promoting social inclusion, and addressing the needs of a



McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS





diverse population, including different age groups, abilities, and cultural backgrounds.

Chapter 6 emphasizes that high-quality social and community infrastructure must be developed alongside housing and other developments. This includes amenities like schools, healthcare, childcare, recreational, and cultural facilities. The plan stresses the need to phase such developments with population growth to ensure that these essential services are accessible to all residents.

The CDP 2022-2028 highlights the importance of securing appropriate buildings and spaces for community use, including facilities for education, healthcare, social services, and recreation. It recognizes the role of local services, such as shops and post offices, in maintaining a sense of community. The plan encourages a partnership approach between public bodies and community organizations to achieve this vision.

One of the key initiatives in Chapter 6 is the promotion of multi-use community facilities. These facilities are designed to accommodate a range of activities and serve various community groups. The goal is to maximize the use of space and resources by encouraging different organizations to share facilities. This approach ensures efficiency and adaptability to meet the changing needs of communities over time. Cork County Council will actively support the clustering of these services, such as co-locating childcare facilities with schools, to create synergies and provide convenience for residents.

Schools and childcare facilities are considered fundamental components of community development. The Plan calls for the timely provision of these services, especially in areas experiencing population growth. There is a focus on providing universally designed facilities that can cater to all, including those with special needs. The Cork County Council is committed to securing sites for educational development, especially in large residential areas, and working closely with educational authorities to ensure adequate capacity.

The CDP 2022-2028 also prioritizes healthcare infrastructure, recognizing the need for both primary care and specialized services. As the population ages, there is an increased demand for healthcare facilities that cater to older residents. Cork County Council is designated as an "age-friendly county," and this chapter details Cork County Council's commitment to providing age-friendly services and infrastructure. The CDP 2022-2028 promotes the integration of services that support older residents, including housing options designed for older people, healthcare services, and recreational opportunities.

Chapter 6 of the CDP 2022-2028 emphasizes the importance of a coordinated, inclusive approach to social and community infrastructure. It highlights how facilities for education, healthcare, childcare, and recreation must be designed to meet the needs of Cork's growing and diverse population. Through careful planning and partnership with local communities, the CDP 2022-2028 aims to create an environment that enhances the quality of life for all residents.



## Local Residents' Response to Extract 1

The key message in part 6 of CDP is the critical importance of:-

- Social and Community Facilities
- Social and Community Infrastructure to include schools, childcare, healthcare and buildings for community use
- Local Services - Shops, Post Office, GP Practices, Dentists, etc,
- Procurement of sites for educational Development

The location for the proposed LRD in Castle Park is remote from all essential services and the report includes "line distance" which creates a misnomer of the actual distances to shops, GP's, public transport, etc. Furthermore all schools in Mallow are at capacity or near capacity and school places will not be available to accommodate children from the proposed Castle Park LRD and indeed all the other proposed LRD's on St, Joseph's Road and the Spa Glen.

## Extract 2

### 6. Social Infrastructure Facilities

This SIA found a total of 224 facilities located within the catchment area of the proposed development (Figure 4). More than a third (86) of the SIA facilities identified were retail facilities, which was the highest count of any SIA category. The category with the lowest count was Public Transport with only 4 facilities. This large number of facilities across 7 categories indicates that this area abounds with social infrastructure facilities and services.



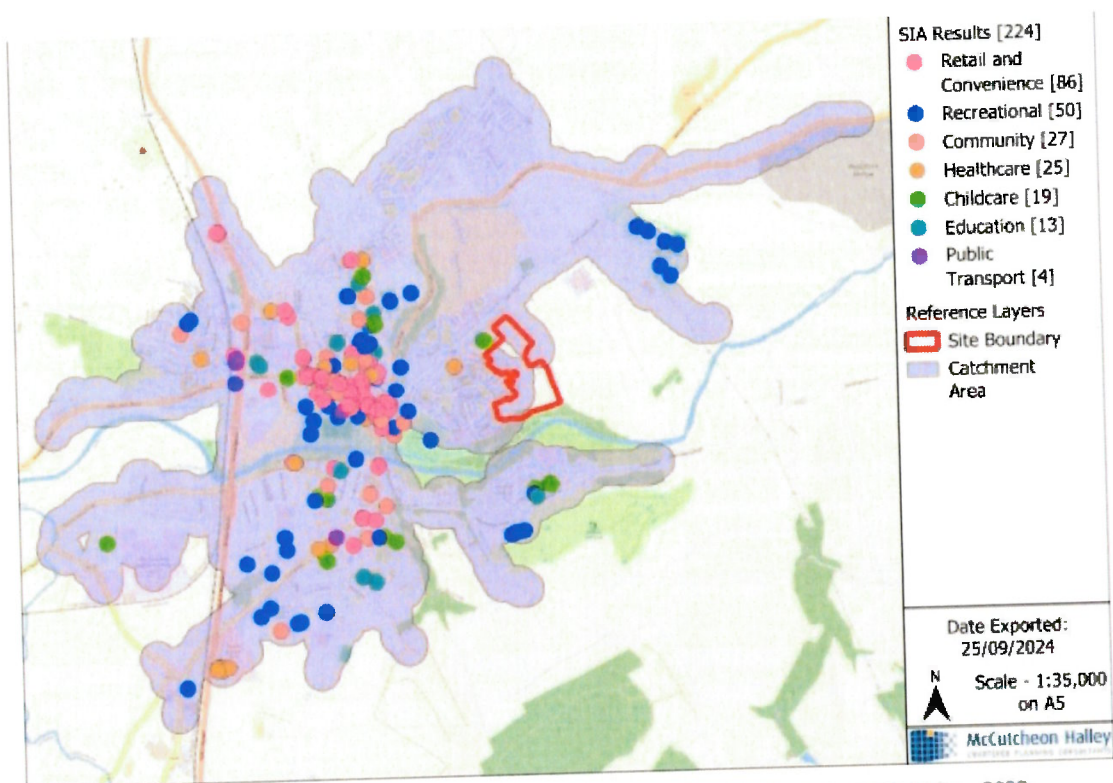


Figure 4: Social Infrastructure Facilities (Sources: Department of Education, 2023; Health Service Executive, 2023; Google Maps, 2023; Cork County Council, 2023; Nursing Homes Ireland, 2023; Open Street Map, 2023; Sport Ireland, 2023; Transport for Ireland, 2023; TUSLA, 2023)

The average distance between a social infrastructure facility and the site boundary is 1,376m, with closest facility 314m and the furthest facility located 3,114m. Based on this distance analysis it can be stated that 109 social infrastructure facilities fall within a 15 minutes' walk from the site boundary (i.e. walk speed of 4.5km/h). The following sub-sections will outline the number and composition of sub-categories of SIA facilities per category. There are seven sub-sections in total listing educational; childcare; healthcare; recreational; and community; retail; and public transport.

### Local Residents Response

- Recreational and Community facilities are remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Gle areas.
- Healthcare facilities are already at capacity or near capacity and again remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Glen areas. **Note - The GP practice as shown butting the proposed Castle Park LRD does not exist, as it closed down circa two years ago.**



- Primary and Secondary Schools are at capacity or near capacity and remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Glen areas. The only exception to remote is the primary school CETB Mallow Community National School, which is currently at full capacity.
- Local Bus Transport does not exist and the only Bus Eireann stop is remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Glen areas.
- The railway station is also remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Glen areas.

### Extract 3

#### 6.1 Education Facilities

Educational facilities ranked 6<sup>th</sup> out of the 7 categories of SIA facilities with 13 facilities in total. Therefore, education facilities only account for 5.8% of the SIA facilities within the catchment area (Figure 5). The education facilities are composed of 6 primary schools, 3 post-primary schools, 3 College Facilities, and 3 other education facilities.



Figure 5: Education Facilities (Source: Dep. of Education, 2023; Google Maps, 2023; Open Street Maps, 2023)





The average straight-line distance to an education facility from the site boundary is 1,315m with closest facility being Mallow Community National School located 326m from the site boundary. Based on Figure 5, it can be deduced that the spatial distribution of educational services is concentrated to the north of the catchment area. With the education facilities located toward the centre of Mallow. The school need and demand report accompanying this application provides a detailed account of capacity figures of the schools within the catchment area. The broad finding of the school need and demand report is that there is sufficient existing capacity within primary and post-primary school facilities in the catchment. Within the catchment area, the 6 primary schools have an estimates 83 spaces available and the 3 post-primary schools have 206 available spaces Table 4 below provides a list of all the education facilities included in this SIA.

### Local Residents Response

- Primary and Secondary Schools are at capacity or near capacity and remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Glen areas. The only exception to remote is the primary school CETB Mallow Community National School, which is currently at full capacity.
- Here again, "line distances" misrepresent the actual distances to all schools with the exception of the primary school CETB Mallow Community National School.

### Extract 4



*LRD at Castlelands, Mallow, Co. Cork  
Traffic and Transportation Assessment*

## 14 Summary

The proposed development consists of 469 no. residential units, 1 no. crèche on site and an upgrade of former lodge to provide an interpretative centre/cafe. It is proposed to access the proposed development via the existing Castle Crest junction with St Joseph's Road, and the existing Castlepark Avenue Junction with St Joseph's Road.

An assessment of the existing traffic and transportation conditions was carried out including baseline traffic conditions and available sustainable modes of transport in the area. The town centre is known to be congested during peak times, this is localised and discussed within. Capacity analysis was carried out on all 9 No. Junctions in the vicinity and which included for the Spa Glens Residential development as background traffic and the future development at Aldworth Heights as requested by Cork County Council. The Aldworth Heights development is not the subject of this assessment.

For the purposes of our assessment, residential trip rates were generated from surveyed data. The trip rates generated from surveyed data are significantly higher than trip rates for similar developments generated from the TRICS database and are therefore a conservative assumption of the predicted vehicular movements generated by the proposed development.



It is possible that as the surrounding road network gets more congested, drivers may use alternate routes to avoid delays. However, the surveyed distribution is considered the most appropriate for the proposed development traffic as it represents the measured current driver choice based on current peak traffic times in the town. It should also be noted that the future transport proposals, once delivered, are expected to alter traffic patterns and reduce the amount of vehicle-generated trips that will access the town centre. Therefore, the surveyed distribution is considered conservative for the later design years of 2031-2041 when these projects could realistically be delivered.

The proposed development does not have a significant impact on the junctions within the existing road network local to the proposed development on St Joseph's Road. The modelled junction results showed congestion within the town centre. The junctions showing congestion are currently of poor geometric design carrying high baseline traffic. The issues can largely be overcome with modal shift targets applied to the design year 2041. In an urban environment it is expected that there may be congestion during peak times. There are also always opportunities to improve signal control operation by adjusting cycle times to respond to changing traffic conditions.

The traffic analysis results presented assume a robust development trip generation. With the modal split targets proposed in the CCC development plan 2022-2028 achieved, all junctions analysed would be within an acceptable design threshold in the design year 2041 with the proposed development, Spa-Glen and Aldworth Heights in operation.

Existing pedestrian, cycling and public transport facilities in the area are not extensive but improvements are planned in the area which will improve choices for commuters. Mitigation measures are proposed by this development such as reduced car parking provision and a generous cycle parking provision in addition to cycle and pedestrian connectivity improvements in the area that are proposed to enhance shifts in travel modal patterns for the residents of the existing and proposed development which will in turn improve capacity of the town road infrastructure.

## Local Residents Response

- Please refer to our overall submission as our response to the above. This is but one of four to six LRD's on St. Joseph's Road and Spa Glen, Mallow, over the next one to ten years. The traffic and transportation assessment does not take cognisance of upwards of 1350 dwellings in our area over the next ten years and its associated traffic densities and gridlock.

## Extract 5

# Schools Assessment

For Development at Castlepark, Castlelands (townland),  
Mallow, Co. Cork

on behalf of Reside (Castlepark) Ltd.





## 7. Conclusion

The report concludes that there is sufficient existing capacity of the primary and post-primary schools within the catchment area. Furthermore, the review of land zoned for educational use found that there are 2 parcels of land zoned for education purposes with both parcels near to the site of the proposed development. Therefore, if the proposed development does generate a demand above the estimated figures, there is provision to accommodate this overflow. This report thus finds that the proposed development does not necessitate the provision of a primary or a post-primary school in the short term. However, the parcels of land zoned for education close to the proposed development must be safeguarded to ensure that there are available locations for the addition of primary schools and primary schools to accommodate the long-term growth of Mallow.

### Local Residents Response

- The school's assessment report does not account for all the other multiple proposed LRD's in the St. Joseph's Road and Spa Glen areas, as detailed in this submission
- Primary and Secondary Schools are at capacity or near capacity and remote from the proposed Castle Park LRD and indeed all other proposed LRD's in the St. Joseph's Road and Spa Glen areas. The only exception to remote is the primary school CETB Mallow Community National School, which is currently at full capacity.

### Summary

Local Residents on St. Joseph's Road have no objection to any proposed housing developments in the overall area, once such developments are designed and built in a balanced, integrated and effective planning and development way, supporting the existing local area balanced neighbourhood layout, taking cognisance of:-

- **Delivering a quality, balanced, integrated and strategic planning approach**
- **Providing upgraded local roads, footpaths, lighting, and safe pedestrian and cyclists ways in the local areas.**

)

- **Delivering roads infrastructure to manage high volume traffic movement and avoid gridlock and traffic jams in the local St. Joseph's Road area.**
- **Supplying all the required amenities and community services to deliver quality of residential living to all current and future residents in the local area.**
- **Delivery of the Mallow Relief Road and associated local roads infrastructure to support.**

St. Joseph's Road and the Spa Glen areas cannot sustain multiple LRD's and consequential high density traffic numbers, as the required roads interconnectivity and infrastructure does not exist in the St. Joseph's Road and Spa Glen areas. Indeed, nor can Mallow Town sustain the resulting increased traffic densities and associated gridlock in Mallow Town itself. Added to that is the fact that local facilities, community services and amenities do not exist in the area to support multiple LRD's.

**An absolute essential prerequisite for any current or future LRD's anywhere in the Spa Glen and St. Joseph's Road, is the construction of the Mallow Relief Road and associated new local road connectivity. Essential arteries to sustain balanced residential friendly LRD's, ensure effective traffic management, deliver safe cyclist and pedestrian ways. Local community amenities and supports are also essential prerequisites.**

#### **Good Planning Principle A Reminder**

**Fingal County Council's pivotal policy on LRD is highlighted in an Irish Times article on 31/8/2024 and reads as follows:-**

*"However, the local authority said that in the delivery of its housing plan, it was not just about the provision of a roof over a person's head – it was also about "taking on projects with amenities and facilities that can serve new residents and existing communities as well".*

*Matthew McAleese, Fingal's director of planning and strategic infrastructure, said: "To address the needs of our growing population, we're not only prioritising building new homes – and ensuring there's space for them – but we're looking to get this done with the necessary social infrastructure going in alongside."*

This is equally the pivotal thrust in our submission to An Bord Pleanála with regard to: **An Bord Pleanála Case reference: LH04.320525 Planning Authority Case Reference: 244243.**

Thank you for the opportunity of lodging our submission and we trust that our observations will be taken into consideration by Cork County Council prior to a decision being reached on **Application Ref: 246036 - Development Address: Castlepark, Castlelands (Townland), St. Joseph's Road Mallow, Co. Cork****Development Description:** A ten year Permission for the following Large Scale Residential Development (LRD) comprising of the construction of 469 no. residential units to include 305 no. dwelling houses (comprising a mix of 1,2,3 and 4 bed detached, semi-detached,





townhouse/terraced and bungalow units) and 164 no. apartment/duplex units (comprising a mix of 1 and 2 bed units), 1 no. creche with a community room, part demolition and refurbishment of the former lodge to provide an interpretive centre and café and all associated ancillary development works.

**Signed:**



**Frank Heffernan**  
**Secretary**

**St. Joseph's Road Residents Planning Group on behalf of:-**  
**(See Table below)**

**Appendix 1 - List of local residents representing this third party appeal**

<b>Electronic Signature</b>	<b>Address</b>	
Kieran Duggan	St. Josephs Road	Mallow, Co. Cork
Elaine Comerford	St. Josephs Road	Mallow, Co. Cork
Patrick Martin O'Sullivan	St. Josephs Road	Mallow, Co. Cork
Denis O'Neill	St. Josephs Road	Mallow, Co. Cork
Denis Dunlea	St. Josephs Road	Mallow, Co. Cork
Nigel Sheehan	St. Josephs Road	Mallow, Co. Cork
Chrissie Lane	St. Josephs Road	Mallow, Co. Cork
Cathy Sexton	St. Josephs Road	Mallow, Co. Cork
Steve Murphy	St. Josephs Road	Mallow, Co. Cork
Sheila Buddle	St. Josephs Road	Mallow, Co. Cork
Philip Hayes	St. Josephs Road	Mallow, Co. Cork
Tom O'Reilly	St. Josephs Road	Mallow, Co. Cork
Kieran Shannon	St. Josephs Road	Mallow, Co. Cork
Dijo Jose	St. Josephs Road	Mallow, Co. Cork
Linda Willis	St. Josephs Road	Mallow, Co. Cork



Noel O'Regan	St. Josephs Road	Mallow, Co. Cork
David O'Donoghue	St. Josephs Road	Mallow, Co. Cork
Ann O'Connor	St. Josephs Road	Mallow, Co. Cork
Ciara Ennis	St. Josephs Road	Mallow, Co. Cork
Paudie O' Callaghan	St. Josephs Road	Mallow, Co. Cork

Electronic Signature	Address	
Linda Daly	St. Josephs Road	Mallow, Co. Cork
Aoife Lehane	St. Josephs Road	Mallow, Co. Cork
James Kennedy	St. Josephs Road	Mallow, Co. Cork
Eileen Horgan	St. Josephs Road	Mallow, Co. Cork
Pat O'Sullivan	St. Josephs Road	Mallow, Co. Cork
Jimmy Gyves	St. Josephs Road	Mallow, Co. Cork
Timothy Bowen	St. Josephs Road	Mallow, Co. Cork

End

**Appendix 2 - Copy of online submission acknowledgement by  
Cork County Council**

**Comhairle Chontae Chorcaí  
Cork County Council**

Head Office County Hall, Cork



Frank Heffernan  
7 Aldworth Heights  
St. Josephs Road  
Mallow  
Co. Cork

20/11/2024



**APPLICANT:** Reside (Castlepark)  
Ltd.

**DEVELOPMENT:** A ten year Permission for the following Large Scale Residential Development (LRD) comprising of the construction of 469 no. residential units to include 305 no. dwelling houses (comprising a mix of 1,2,3 and 4 bed detached, semi-detached, townhouse/terraced and bungalow units) and 164 no. apartment/duplex units (comprising a mix of 1 and 2 bed units), 1 no. creche with a community room, part demolition and refurbishment of the former lodge to provide an interpretive centre and café and all associated ancillary development works including vehicular and pedestrian access (via the existing Castle Park residential estate), drainage, footpaths and cycle lanes, landscaping, amenity and open space areas, boundary treatments, bicycle and car parking, bin and bike storage, plant, public lighting and all other ancillary development at Castlepark, Castlelands (townland), St. Joseph's Road, Mallow, Co. Cork. An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) has been submitted to the planning authority with the application. The Environmental Impact Assessment Report and Natura Impact Statement will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy during office hours at the offices of the Local Authority. The application may be inspected online at the following website set up by the applicant: [www.castlelandslrd.ie](http://www.castlelandslrd.ie).

**AT:** Castlepark Castlelands (Townland) St. Joseph's Road Mallow, Co. Cork

**FOR:** LRD Permission

**PLANNING REGISTRATION NO:** 24/6036

A Chara,

I wish to acknowledge receipt of your online submission/observation on 20/11/2024 concerning this application. I wish to confirm that your submission/observation has been received within the period of five weeks beginning on the date of registration of the application and is therefore considered a valid submission/observation.



**Comhairle Chontae Chorcaí**  
**Cork County Council**

Head Office County Hall Cork



Copies of site map/plans and particulars submitted in connection with the application will be available for inspection at this department during office hours (9.00 a.m. to 4.00 p.m., Monday to Friday) until the application, or any appeal thereon, is finally determined. The applicant shall be given your name and content of the submission/observation should it be requested.

Your submission will form part of the documentation available for inspection by the public. You will be notified when a decision is made on the application.

**This document should be retained. If you wish to appeal such decision a copy of this acknowledgement together with the attached official document must accompany your appeal to An Bord Pleanála.**

CORK COUNTY COUNCIL  
PLANNING DEPARTMENT  
County Hall, Carrigrohane Road.  
Cork.





Registered Post



An Bord Pleanála

64 Marlborough Street,

Dublin 1,

D01 V902

