

C. Carleton  
LDG-086756-26



## Large-scale Residential Development Appeal Observation

Online Reference  
LRD-OBS-006403

### Online Observation Details

Contact Name  
Seb Clerkin

Lodgement Date  
17/02/2026 12:52:06

Case Number / Description  
324030

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
sebastian Clerkin

Payment Amount  
€50.00

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

Yes  No

Request Emailed to Senior Executive Officer for Approval

Yes  No

Signed

EO

Date

### Finance Section

Payment Reference

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Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date



# Validation Checklist

Lodgement Number : **LDG-086756-26**  
Case Number: **ACP-324030-26**  
Customer: **Seb Clerkin**  
Lodgement Date: **17/02/2026 13:00:00**  
Validation Officer: **Cathy Carleton**  
PA Name: **Cork City Council**  
PA Reg Ref: **2544048**  
Case Type: **Appeal - LRD**  
Lodgement Type: **Observation / Submission**



Validation Checklist	Value
Confirm Classification	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
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes

*LRD40 / to Observer  
✓ S.S. 2/3/26*

Run at: 25/02/2026 13:03

Run by: John Cannon

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The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1.

Date: 17<sup>th</sup> of February 2026

**RE: Third-Party Appeal against the decision of Cork City Council to Grant Permission**

**Planning Authority:** Cork City

**Planning Authority Ref:** 25/44048

**Development Description:** Large-Scale Residential Development (LRD), Greenfields, Ballincollig

**Appellant:** Dr. Seb Clerkin, Stone Lodge, Greenfields Rd., Ballincollig, Cork, P31 R983.

Dear Secretary,

I set out herein the grounds of appeal against the decision of Cork City Council to grant permission for the above-referenced development.

While I support the principle of residential development in Ballincollig, I submit that the proposed development **materially contravenes** the Cork Metropolitan Area Transport Strategy (CMATS) 2040 and the **Design Manual for Urban Roads and Streets (DMURS)** by foreclosing future strategic transport options.

The grounds of appeal are set out below:

**Ground 1: Foreclosing of Strategic Transport Options & Lack of Future-Proofing**

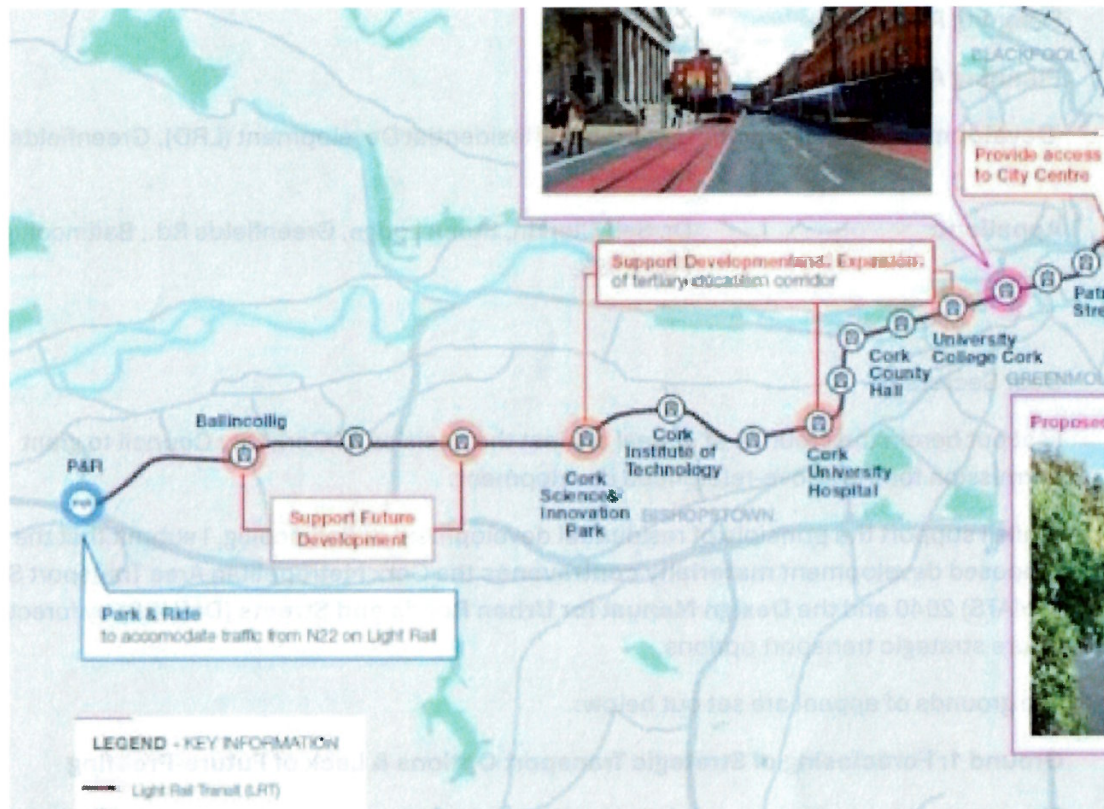
The proposal is **premature** as it fails to safeguard the Greenfields Road (L2216) corridor for inevitable future public transport upgrades.

- **Uncertainty of Final Light Rail Route:** Recent reports from January and February 2026 ([Irish Independent 30-Jan-2026](#)) confirm that the final route for the Cork Luas has **not yet been established**. While an "Emerging Preferred Route" (EPR) was identified in 2025, the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) have announced that a **second round of public consultation** will take place in Q2 2026 to address the significant dissatisfaction (45% of submissions) regarding the initial proposals. The current proposed route will be subject to revisions.

Much of the initial criticism of the latest proposed route was related to the single-track loop for its lack of scalability and capacity, there is a high probability that the revised 'Proposed Preferred Route' in Q2 2026 will look toward alternative corridors to ensure a high-frequency, double-track service. Safeguarding Greenfields Road as one such alternative is a matter of basic strategic foresight.

Initial proposals for the Cork LUAS included routes commencing at a Park & Ride at the junction of the N22 and Greenfields Road (L2216). While recent proposals may differ, it is conceivable that planners may revert to the original route to serve the large

population here, especially with the significant criticism of the single-track loop in Ballincollig. An effective LUAS requires a dedicated lane to avoid traffic congestion. By permitting a high-density LRD with buildings positioned at the road boundary, the Planning Authority is effectively **sterilising this corridor** from ever being considered as a Cork Luas route and the building of a park and ride facility at the junction of the N22 and L2216. See figure 1 below.



**Figure 1:** Initial Cork City plan for the light rail to start at a Park and Ride at the top of Greenfields road and route along the L2216.

In addition, if the preferred route selected is the main road within Ballincollig (R608) rather than Greenfields Road (L2216), then there would still be a need to add additional traffic and bus routes to the L2216 to facilitate a dedicated LUAS line.

Permitting a high-density LRD with permanent building lines at the road edge *now* is fundamentally premature when the strategic transport requirements for the Ballincollig area are still in a state of flux and subject to active redesign. By permitting buildings positioned at the road edge without a strategic setback, the Council is effectively sterilising Greenfields Road from being utilised as a secondary or primary transit corridor should the final 2026 route selection require it.

- **Conflict with CMATS 2040:** CMATS requires that road networks in "Growth Areas" like Ballincollig remain flexible. A 3.0m bus lane and 2.0m segregated cycle track (standard for BusConnects Cork) require a corridor width of ~15.5m. The current proposal creates a **permanent physical "pinch point"** that will prevent the future delivery of these sustainable modes. To ensure the long-term integrity of the Cork transport network, a

mandatory 5-meter building setback should be required for both sides of Greenfields Road. This would provide the necessary "future-proofing" demanded by CMATS 2040.

- **Infrastructure Bottleneck:** Approving this layout now ignores the "Network Redesign" objectives. Future-proofing requires a **strategic setback** from the current road edge to ensure that as Ballincollig grows, its infrastructure can grow with it.
- The current design is "**short-termist**." It fails to account for the inevitable role of the L2216 as a **strategic transport connector** in a growing Ballincollig. The **Design Manual for Urban Roads and Streets (DMURS)** Section 2.2.1 (The User Hierarchy), mandates that the design process must prioritize pedestrians, cyclists, and public transport users *above* private motor vehicles. By failing to provide a building setback, the applicant has prioritized the maximization of the private development footprint over the delivery of safe, high-quality infrastructure for the top three tiers of the hierarchy.
- **Ballincollig Park & Ride:** The NTA has identified the need for a **1,000-vehicle Park & Ride facility** in the Ballincollig area. Until the exact location and access requirements for the 1,000-vehicle Park & Ride are finalized, permitting a high-density development on Greenfields Road—a primary access point to the N22 —risks creating a permanent infrastructure bottleneck that would undermine the success of this Park & Ride. Refer to NTA map attached showing position of this facility at junction of Greenfields road (L2216) and the N22
- **DMURS Section 4.2.1 (Building Lines and Enclosure)** encourages enclosure to create a "sense of place," it also emphasizes that building lines must be "multifunctional." A building line set at the absolute minimum today **sterilizes** the road's ability to accommodate an "Optimum BusConnects Cross-Section" (approx. 15.5m) in the future.
- **Material Contravention of CMATS 2040:** Under the Cork Metropolitan Area Transport Strategy (CMATS), Greenfields Road is identified as a supporting link. Permitting a "hard edge" development here creates a permanent physical bottleneck, directly contradicting the CMATS objective to provide a "resilient and future-proofed transport network" (Section 1.5).
- The Planning Authority's decision fails to acknowledge the **mandatory nature of DMURS**, which requires designers to 'balance the needs of all users' (Section 1.2). By allowing a building line that essentially hugs the current narrow road boundary, the Board is permitting the permanent 'lock-in' of a sub-standard transport corridor. This is not merely a local concern; it is a strategic failure to safeguard the future transport needs of ballincollig by removing the only viable space for future lane expansion or high-capacity cycle infrastructure."

## **Ground 2: Failure to Provide Safe Infrastructure (Bus Stops & Set-Down)**

The development fails to provide a safe interface for public transport, creating a **traffic hazard** under Article 9(1)(a)(iii) of the Planning Regulations.

- **Existing Hazard:** Greenfields Road is already under significant pressure. Currently, school children and commuters wait on narrow, unprotected verges.

- **Omission of Dedicated Facilities:** Despite the scale of this residential development (LRD), the application lacks provision for integrated bus bays or safe set-down areas.
- **Request for Condition:** Should the Board be minded to grant permission, I request a condition requiring a **minimum 10 meter setback** along the entire site frontage to accommodate a dedicated, safe bus stop and high-quality pedestrian realm on both sides of Greenfields road, in line with DMURS principles.

### **Ground 3: Inappropriate Massing and Poor Transition to Existing Context**

The proposal represents a "hard urban edge" that is incompatible with the established character of Greenfields Road.

- **Overbearing Impact:** The positioning of three-story structures with pitched roofs at the immediate road edge exerts a dominating effect on the existing low-density dwellings.
- **Loss of Visual Amenity:** Proper planning and sustainable development require a **graduated transition**. The loss of the green frontage and mature trees in favor of a hard-standing building line is an unnecessary degradation of the local environment. A more thoughtful design would utilize a green setback to provide both visual relief and the necessary space for future transport infrastructure.

### **Conclusion**

This is an 'inward-looking' proposal that treats Greenfields Road as a static, minor lane. National policy (CMATS 2040 and Project Ireland 2040) demands that it be treated as a dynamic part of a high-density, transit-oriented suburb. To grant permission without a mandatory 5-meter building setback for both sides of the road is to allow a private developer to block State investment in Cork's transport future.

This proposal prioritizes immediate unit count over the long-term strategic integrity of the Cork transport network. It creates a permanent infrastructure bottleneck on a road that will inevitably require upgrading to serve the very residents this development proposes to house.

I respectfully request that An Bord Pleanála **overturn the decision** or, at a minimum, require a significant redesign of the site frontage to include a **strategic transport setback**.

Yours sincerely,

*Dr Seb Clerkin*

**Dr. Seb Clerkin**

# Indicative Strategic Park and Ride locations



All routes and alignments are indicative and subject to change through the statutory scheme appraisal process.

## [Cork \(/regionals/cork/\)](/regionals/cork/)

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### Cork's light rail project going back for a second round of public-consultation before summer



Indicative view of Cork Luas near Páirc Uí Chaoimh.

**Kevin Galvin**

Fri 30 Jan 2026 at 16:10

A much-anticipated light rail system for Cork will begin its next phase in the second quarter of next year.

[Privacy](#)

Cork LUAS, which currently has “no definitive timeline” for completion, released the results of its public consultation on the Emerging Preferred Route in October. The consultation attracted more than 1,000 submissions, with two-thirds focused on destinations not included as part of the planned route (<https://www.independent.ie/regionals/cork/news/over-two-thirds-of-cork-luas-submissions-call-for-project-to-have-greater-reach/a2019256494.html>).

The consultation, which ran for eight weeks from mid-April to early June, included online portals, four public open days, and pop-up events in three major shopping centres across the city.

It was based around a route running from Ballincollig village to Mahon Point, taking in busy areas such as CIT, UCC, CUH, the city centre and Páirc Uí Chaoimh along the way.

Now, the National Transport Authority (NTA), in response to a question from local councillor Peter Horgan, has confirmed that a second round of public consultation will take place in the second quarter of 2026, with a final route to be detailed before the end of the year.

The group says this follows ‘amendments’ made to the scheme proposals after the first round of consultation, but did not reveal what those potential amendments might be. In May, Cork LUAS chiefs told the *Irish Independent* that the route could change following public submissions (<https://www.independent.ie/regionals/cork/news/cork-luas-chiefs-considering-expansion-of-proposed-route-out-to-dells-base-in-ballincollig/a1126432274.html>).



Cork Luas Project Manager Sarah O'Donnell speaking at the launch of the Emerging Preferred Route earlier this year. Photo: John Seery. Privacy

“A non-statutory public consultation was launched in April 2025 on the Emerging Preferred Route for Luas Cork,” said the response, which was released today.

“Just over one thousand submissions were received in respect of that consultation, which have been reviewed and assessed by Transport Infrastructure Ireland (TII) and their design team. Arising from the consultation process, some amendments are anticipated to be made to the scheme proposals.

“Following the development of those revised designs, it is intended that TII will undertake a second round of public consultation in Q2 2026, setting out a proposed ‘Preferred Route’.


“It is expected that, following the finalisation of the Preferred Route later this year, the project would progress to preparing the extensive documentation required for a Railway Order application to An Coimisiún Pleanála, in tandem with developing the Preliminary Business Case for the project, as required by the Government’s Infrastructure Guidelines.”

Cllr Horgan said he welcomed the update on the project but, like many of those who made submissions, called for a more expansive and ambitious route scheme, including spurs to Cork Airport, as well as Douglas and Carrigaline.

“The sheer scale of the consultations received shows the appetite from the people of Cork for a light rail system, but more importantly, a light rail system that works for the people of Cork.

“I reiterate we should be implementing spur lines to the Airport and towards Douglas and Carrigaline to future-proof the light rail ecosystem, along with enhancing the Northside areas that won't be supported under the Cork Commuter Rail project.

“Rail is by far the fastest moving alternative to single occupancy vehicles, and the Cork Commuter Rail is a success story that I want to see replicated over the river on the southside, especially.”

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# Cork Luas: What 1,000 residents have to say about light rail plan

Ann Murphy delves into the newly-published objections and observations on plans for Cork's light rail system — including not one but three suggested extensions to the proposed route



St Patrick's Street is at the centre of the proposed Cork Luas route, but many of the public observations focus on either end, including Ballincollig and Ballintemple — and the 'missed opportunity' that it does not connect to Cork Airport and areas including Blackpool and Glanmire.

MON, 20 OCT, 2025 - 01:11

ANN MURPHY



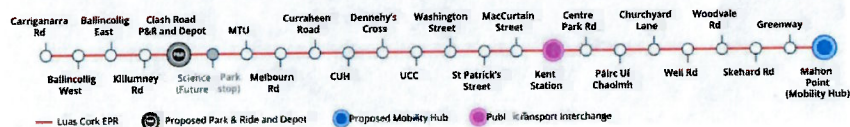
There were times when Brendan Crowley could leave Dublin Airport at 6.30am on a flight to Manchester and be at work in an office in Cheshire at 8.45am.

The Cork man used planes, trains, and automobiles to get from his then home in Kildare to a work engagement in Crewe, some 48km from Manchester Airport.

“I would have to get up at 4.30am because I was living in Kildare. The longest part of my journey was going from Kildare to Dublin because that was in a car,” he explained.

Now living in East Cork, he is keenly aware, because of his experiences both in England and cities around Europe, of the importance of rail and light rail.

As a result, Brendan entered one of the 1,003 submissions received in the consultation process launched in the early summer on **the emerging preferred route for Cork’s light rail system**, Luas Cork.



**Scheme of the proposed Cork Luas stops.**

The proposal is for an 18km light rail line linking Ballincollig and Mahon, through the city centre. Among the locations to be serviced by the line will be the Munster Technological University, Cork University Hospital, University College Cork, Kent Station, the Docklands, Páirc Uí Chaoimh, and Mahon.

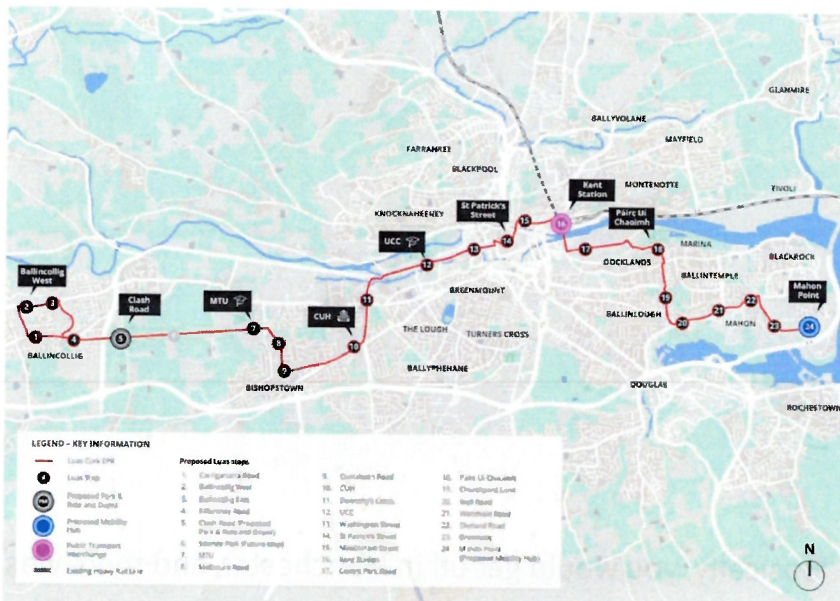
It is projected that the journey time from Ballincollig to the city centre will be 35 minutes. The total journey time from

Ballincollig to Mahon, taking in the city centre, will be 55 minutes.

As part of the project, a 1,000-space park-and-ride facility is to be located in Ballincollig, and a 'mobility hub' in Mahon, both equipped with bike parking, EV charging, and pick-up/drop-off points.

Based on transport demand analysis, it is expected that up to 2,300 passengers per hour will use the system in each direction at peak times, according to Transport Infrastructure Ireland (TII).

Services will run every six minutes, or more frequently if demand increases, says the TII.



A more detailed map of the 'emerging preferred route' of the Cork Luas. Pictures: LuasCork.ie

As it stands, the stops on the emerging preferred route will be: Carriganarra Rd, Ballincollig; Ballincollig West; Ballincollig East; Killumney Rd; Clash Rd (which will be a park and ride, and depot); Science Park (future stop); Munster Technological University; Melbourn Rd; Curraheen Rd; Cork University Hospital; Dennehy's Cross; University College Cork; Washington St; St Patrick's St; MacCurtain St; Kent Station (public transport interchange); Centre Park Rd; Páirc Uí Chaoimh; Churchyard Lane; Well Rd; Woodvale Rd; Skehard Rd; Greenway, and Mahon Point (mobility hub).

It will also incorporate a new bridge over the River Lee, at Kent Station, linking to Kennedy Quay.

## 'Missed opportunity' to link to Cork Airport

There are no plans as yet to **extend** the light rail line to **Cork Airport**, which Brendan believes is a lost opportunity and which he highlighted in his submission.

"I used to spend a lot of time going from my home in Kildare to Dublin Airport to Manchester and down to Crewe," He says.

"Basically, you would get off in Manchester, and there was a railway spur running into the airport. People could either go into Manchester or down to the main rail network for the whole of the UK."

His submission was among the 181 received which recommend extending Luas Cork to Cork Airport.

In its submission, Cork Airport strongly supported the proposal and encouraged planners to include a future link in the design.

It was also highlighted in the submission from Cork Chamber, which stated:

“It is essential that the current planning for Cork’s light rail system includes consideration of future spurs or extensions, particularly to Cork Airport, as the city’s population, economy, and mobility needs continue to grow.”

## 1,003 submissions

The report published last week outlined that:

- 279 respondents (29%) expressed overall support for the project;
- 76 respondents questioned the overall value of the project, and the long-term impact of Luas Cork, with issues including “the limited reach of a single line, particularly its failure to connect important areas in the west and south of Cork, such as the airport”;
- The absence of a second line, running north to south, was also highlighted;
- 52 respondents focused on the current public transport systems, with some respondents arguing that enhancing bus and commuter rail services “could deliver faster and more cost-effective results than building a new Luas line”. Existing difficulties such as lengthy travel times and limited weekend schedules were raised in the current services in areas including Douglas, Carrigaline, Ballincollig, and

near Cork Airport. Some also queried whether the route effectively targets locations with the most urgent need for improved connectivity, and also highlighted that it overlaps with existing public transport services;

- 326 submissions (33%) focused on how properties and businesses in their communities would be affected — including 107 each regarding Ballincollig and Ballintemple. The concerns included potential traffic disruption, construction impacts, loss of parking, and safety risks;
- 223 respondents called for the route to include areas such as Douglas, Carrigaline, Rochestown, Frankfield, Ringaskiddy, Ballinhassig, and Ballyphehane;
- 169 respondents proposed extending the route westward to Classis Lake and Ovens, while 181 supported extending Luas Cork to Cork Airport;
- 118 respondents suggested extending the route northward to areas such as Glanmire, Blackpool, Hollyhill, Fairhill, and Mayfield;
- 105 submissions observed that the proposed tram line shares long stretches of road with buses and cars, with many feeling it could “negatively impact the reliability and safety of the service, leading to slower journey times due to traffic congestion and frequent bus stops”.



## Furore about proposed bridge

The creation of a new bridge between Kent Station and Kennedy Quay **has raised concerns about a knock-on effect on the maritime life of the city**, including the possibility of blocking vessel access to the city centre, and affecting events such as the Ocean to City race.



A Cork Metropolitan Area Transport Strategy (CMATS) visualisation of a possible Cork Luas line and bridge between Kent Station and Cork's South Docklands.

One respondent, Fergus Hurley, said in his submission:  
“We need a more accelerated delivery programme.

“The line should go along the Cork-Blackrock- Passage-Crosshaven line using the existing bridges from Kent Station to City Hall, so that the old Port of Cork is not sterilised to boats.

“While I appreciate the need for reliability and frequency, the proposed route is too meandering and will take too long.”

The team behind Luas Cork acknowledges the project is not going to be welcomed by everybody.



**TII head of light rail projects Paolo Carbone says the goal is to design a route that serves as many people as possible.**

Paolo Carbone, TII's head of light rail capital programme, said: "No line can be built without impacting negatively on some residents or some businesses.

"Acquiring a building is something we do as a last resort, and the proof of this is that you can see that the alignment tries to negotiate narrow corners where it is necessary.

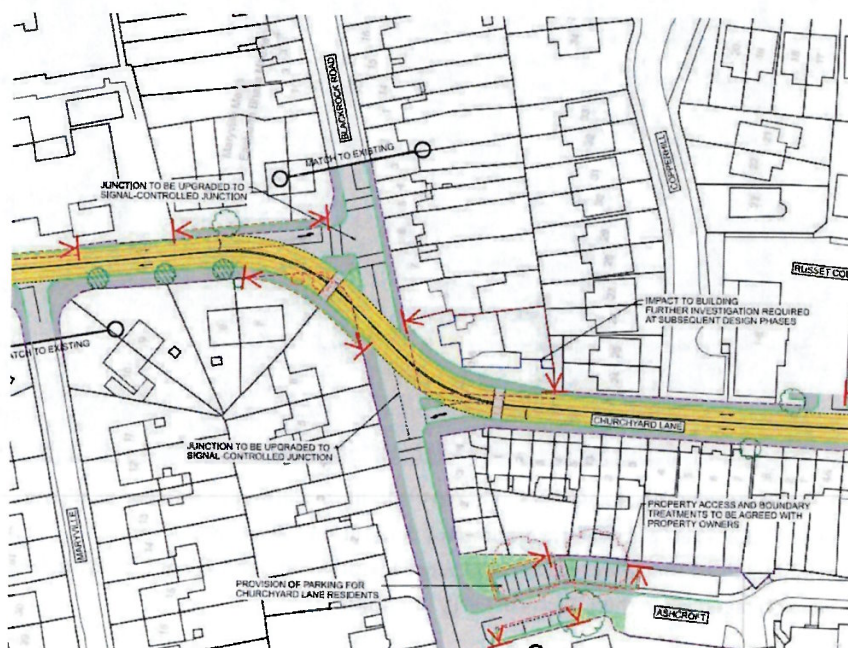
“Unfortunately though, there are physical limits to what can be done.

“On balance, we carefully considered the impacts, we weighed up the alternatives, we have assessed the benefits and impacts of these options, and on balance, this is the one that delivers the best possible route.

“Whichever route we choose — and the goal for us is to design a route that serves as many people as possible — based on what we know to be the key destinations, in achieving the least impactful trade-offs possible.”

## Controversy over tramline through a pub

Among the businesses set to be most impacted by the project will be the Venue Bar in Ballintemple, operated for the past 11 years by Con Dennehy and Kate Tierney.



**The operators of the Venue Bar in Ballintemple only learned that the Cork Luas route was proposed to run through their premises when this map was published in April.**

They found out in April, when the emerging preferred route was unveiled, that the Venue was on the route. Maps for the project showed tram lines running through the popular bar.

Mr Dennehy told the *Irish Examiner* that they have been told that they will hear more on what it means for the business in early 2026.

Details of the preferred route will be published in the first quarter of next year with a further public consultation to take place on that.



**The people who run the Venue Bar in Cork's Ballintemple were shocked to discover in April that their pub was earmarked for demolition. TII's Paolo Carbone acknowledged that they had not contacted the publicans beforehand but that they have engaged since then. Picture: Larry Cummins**

He said the future for the Venue currently remains in limbo, adding: "I wish I knew what was going to happen,