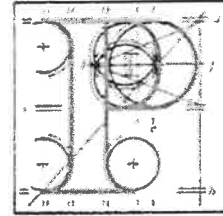


**Our Case Number:** ABP-320648-24

**Your Reference:** Residents of St. Joseph's Road & Aldworth Heights



**An  
Bord  
Pleanála**

Patterson Design  
c/o Mark Patterson  
Churchtown  
Newcastle West  
Co. Limerick

**Date:** 26 September 2024

**Re:** Proposed construction of 138 residential units and all associated site works at Spa Glen, Mallow, Co. Cork  
Spa Glen, Mallow, Co. Cork

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

A handwritten signature in black ink that reads "Kevin McGettigan". The signature is written in a cursive style and is positioned above a horizontal line.

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

AA02

Tel  
Glao Áitiúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

Tel  
LoCall  
Facs  
Website  
Email

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

---

**Kevin McGettigan**

---

**From:** Frank Heffernan <frankheffernan2015@gmail.com>  
**Sent:** Tuesday 24 September 2024 11:44  
**To:** LAPS  
**Subject:** Bord Pleanala Case Number JP04.320648  
**Attachments:** BP Cover letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

I refer 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. Notice of Planning Application to An Bord Pleanála for Approval. Bord Pleanala Case Number JP04.320648.

This email is on behalf of local residents of St. Joseph's Road and Aldworth Heights Estate, St. Joseph's Road, Mallow, Co. Cork.

Please find attached:-

1. Local residents' observations with regards to JP04.320648.
2. Cover letter from the agent representing local residents.

Please note that because attachment 1 is a large file, it is being sent as a link file with this email. If there is a problem opening the file, please advise and I can resend it in two sections.

Two hard copies of 1 and 2 above, have been posted this morning, by registered post, to LAPS, An Bord Pleanala, 64 Marlborough Street, Dublin 1. DO1 V902.

Mise le meas,

Frank Heffernan  
Local Resident  
0876345874

Patterson Design  
Churchtown,  
Newcastle West,  
Co. Limerick  
V42 YW58

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

**Re: Bord Pleanala Case Number JP04.320648 – 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**

A Chara,

I write, as the appointed agent for local residents of St. Joseph's Road, Mallow, Co. Cork and Aldworth Heights, St. Joseph's Road, Mallow, Co. Cork and with this letter, enclose their comprehensive, detailed and quantitative submission on local residents' issues and concerns on the implications of Cork County Council's proposed development at Ard an Ghlean, St. Joseph's Road, Mallow, Co. Cork, for proper planning and sustainable development in their local area.

Local residents strongly feel that the proposed development is premature, and does not take into account the proposed other additional LRD's on St. Joseph's Road and Spa Glen, which delivers upwards of a further 1200 dwellings in the area. The resulting daily traffic density increases detailed within this submission will result in traffic jams on St. Joseph's Road and Spa Glen not to mind gridlock on the south end of Mallow Town.

Local residents assert that Cork County Council's LRD and indeed all other private developers' current and near future LRDs in their local area should not just be about the provision of a "roof over a person's head" – but 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



Architectural & Design Services

Mark Patterson Mob: 087 9424605

Patterson Design  
Churchtown,  
Newcastle West,  
County Limerick  
Ireland.

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.

Local residents are not objecting to housing developments, but ask for a balanced strategic and integrated planning approach with priority given initially to the building of the Mallow Relief Road and associated local roads infrastructure, together with the provision of local community amenities and supports.

Hopefully An Bord Pleanála will look at the bigger picture of 1200 houses being built in the area over the next 5 to 7 years and realise that integration of Cork County Council's proposed LRD with the adjoining private developers LRD's is the most sensible and practical outcome.

Mise le Meas,

Signed:

*Mark Patterson*

Mark Patterson, Patterson Design

email: pattersongroup13@gmail.com



**Local Residents of St. Joseph's Road and Aldworth Heights  
submissions and observations in 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:-**

***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.***

***Notice of Planning Application to An Bord Pleanála for Approval***

***Bord Pleanala Case Number JP04.320648***

***Decision Date - 17/2/2025***

<b>Contents</b>	<b>Page</b>
<b>Executive Summary</b>	<b>2</b>
<b>Introduction</b>	<b>5</b>
<b>Submissions and Observations</b>	<b>9</b>
<b>Future Traffic Densities and Gridlock</b>	<b>17</b>
<b>Integrated Approach</b>	<b>21</b>
<b>Part 8?</b>	<b>25</b>
<b>Cork County Council's Development Plan 2022 to 2028</b>	<b>31</b>
<b><u>Design Manual for Quality Housing From Department of Housing, Local Government and Heritage</u> - Addendum 3</b>	<b>33</b>
<b>An Bille um Pleanáil agus Forbairt, 2023 - Planning and Development Bill 2023. SCHEDULE 4 - Section 390:</b>	<b>34</b>
<b>Sustainable LRD in a Country Town - A Reflection</b>	<b>36</b>
<b>Bord Pleanála Cases - Refusal Reasons Precedents</b>	<b>45</b>
<b>Good Planning Principle</b>	<b>48</b>
<b>Martin Hanley &amp; Associates Ltd., Reports for Cork County Council</b>	<b>49</b>
<b>St. Joseph's Road Concerns</b>	<b>66</b>
<b>Kanturk Mallow Municipal District LAP 2017 and the Cork County Development Plan 2022 - North Cork</b>	<b>68</b>
<b>Local resident's proposals for balanced, integrated and effective planning</b>	<b>75</b>
<b>Pedestrian and Cyclist Access/Egress - Cork County Council's Options to An Bord Pleanála</b>	<b>85</b>
<b>Conclusion and Observers' Signatures List</b>	<b>87</b>
<b>Appendix 1 - Consultation Document</b>	<b>92</b>
<b>Appendix 2 - Photo Montage</b>	<b>104</b>

## **Executive Summary**

This submission to An Bord Pleanála is a comprehensive, detailed and quantitative document on local residents' issues and concerns on the implications of Cork County Council's proposed development at Ard an Ghlean, 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 the proposed other additional LRD's on St. Joseph's Road and Spa Glen, which delivers upwards of a further 1200 dwellings in the area. The resulting daily traffic density increases detailed within this submission will result in traffic jams on St. Joseph's Road and Spa Glen not to mind gridlock on the south end of Mallow Town.

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.

**This submission highlights many local issues and concerns and also outlines design contradictions with regards to:-**

- Placemaking and Sustainable Communities Model
- Placemaking and Placemaking Design Standards
- Cork County Council's Development Plan 2022 -2028 with regard to housing developments
- Martin Hanley & Associates Ltd., reports on Residential Travel Plan, Road Safety Matters and Traffic and Transport measures
- Design Manual for Quality Housing From [Department of Housing, Local Government and Heritage](#) - Addendum 3
- An Bille um Pleanáil agus Forbairt, 2023 - Planning and Development Bill 2023. SCHEDULE 4 - Section 390:
- **Section 28 Guidelines for Planning Authorities - Design Standards for New Apartments (July 2023)** From [Department of Housing, Local Government and Heritage](#)
- **St. Joseph's Road Concerns**
- **Kanturk Mallow Municipal District LAP 2017 and the Cork County Development Plan 2022 - North Cork**

## **Bord Pleanála Case reference: JP04.320648**

Aldworth Heights is a private estate which was never taken in charge by Cork County Council, in its 24 years of existence, is managed and maintained by estate residents. The road section of Aldworth Heights from the public road entrance to the boundary of the proposed Ard an Ghleana LRD is a right of way, owned by a private individual. Residents of Aldworth Heights have additional particular issues and concerns regarding the proposed LRD, Ard an Ghleana, which are detailed in this overall submission.

This submission also includes six cases of An Bord Pleanála refusals which local residents feel are precedents for refusal of Cork County Council's current design for the proposed development at Ard an Ghlean, St. Joseph's Road, Mallow, Co. Cork.

Local residents also include three proposals for an integrated and better balanced development, taking into perspective the bigger picture of all the LRD's of upwards of 1200 dwellings on St. Joseph's Road and Spa Glen over the next three to five years and promote the safest access/egress option for pedestrians and cyclists which will prevent road traffic accidents and serious injuries in the short medium and long term Ref: Option B Route: Martin Harvey and Associates report and recommendations, to Cork County Council, on the Residential Travel Plan.

What will also be very apparent within this 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 is 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 Cork County Council's proposed development at Ard an Ghlean, St. Joseph's Road, Mallow, Co. Cork. 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 overall submission to An Bord Pleanála with regard to Cork County Council's Section 177AE application to An Bord Pleanála for the proposed LRD, Ard an Ghleana on St. Joseph's Road, Mallow, Co. Cork. Local Residents have been aware of this pending application for many years and have had many communications with Cork County Council and Local Public Representatives. Local residents submitted a consultation document to Cork County Council's relevant departments and local public representatives in February 2023 and subsequently in the early months of 2024, with no engagement, consultation or response from the various departments, whilst a small number of local public representatives had partial engagement with local residents.

## **Bord Pleanála Case reference: JP04.320648**

Appendix 1 in this submission includes the consultation document, as circulated over the past year and nine months to Cork County Council relevant departments and local public representatives, with no engagement or response from Cork County Council.

This consultation document details issues and concerns, an engineers report as completed in May 2007, together with copies of communications with local public representatives and Cork County Council back then. A previous proposal for an LRD on the site circa 2008 was voted down by Mallow UDC. Appendix 2 - is a montage of photographs of Aldworth Heights entrance, the private right of way/way leave, St. Joseph's Road and Spa Glen - town end.

Local residents were led to believe, by some local public representatives, that the Part 8 process would be used by Cork County Council with regard to the application to Bord Pleanala, only to discover by site notice and public newspaper notice that Cork County Council are using the Section 177AE process.

Through this submission to An Bord Pleanala, local residents are confident that An Bord Pleanala will thoroughly review our issues and concerns and issue a decision on the basis of good and balanced planning principles in the delivery of an integrated housing plan for the overall St. Joseph's Road and Spa Glen areas.

Cork County Councils LRD and indeed all other private developers' LRDs 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 existing development that already exists around them.

In closing I have to stress that local residents are not objecting to housing developments, but ask for a balanced strategic and integrated planning approach with priority given initially to the building of the Mallow Relief Road and associated local roads infrastructure, together with the provision of local community amenities and supports. Hopefully An Bord Pleanala will look at the bigger picture of 1200 houses being built in the area over the next 5 to 7 years and realise that integration of Cork County Council's proposed LRD with the adjoining private developers LRD's is the most sensible and practical outcome.

**Signed:**



**Dave Lonergan - Chairperson  
St. Joseph's Road and Aldworth Heights Planning Group  
10/9/2024**



## **Introduction**

**Local Residents of St. Joseph's Road and Aldworth Heights submissions and observations in the proposed development in relation to:-**

- 1. 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.***

***Notice of Planning Application to An Bord Pleanála for Approval***

***Notice is hereby given that Cork County Council intends to seek the approval of An Bord Pleanála under Section 177AE of the Planning and Development Act, 2000 (as amended) and the requirements of the Planning and Development Regulations 2001 (as amended) to undertake the following development:***

***Bord Pleanala Case Number JP04.320648***

*Schedule*

**LOCATION    NATURE & EXTENT OF DEVELOPMENT**

---

*Lands at  
Mallow, Co.  
Cork.*

- *4 four-bed semi-detached houses,*
- *14 three-bed semi-detached houses,*

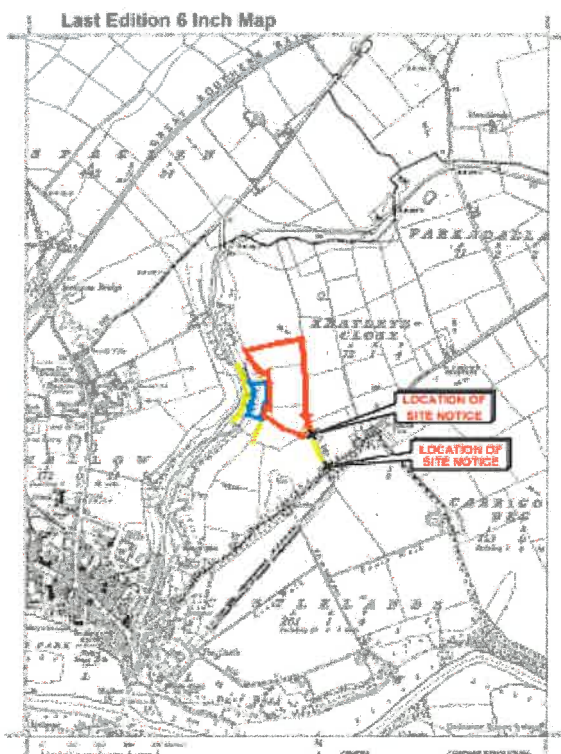
*In the  
townland of  
Spa Glen*

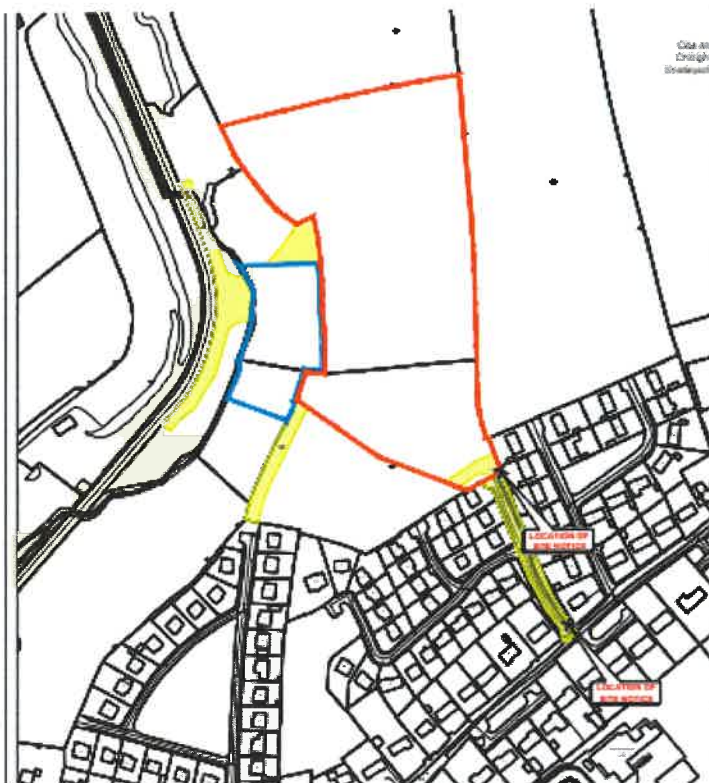
- *20 three-bed townhouses,*
  - *36 two-bed townhouses,*
  - *32 two-bed apartments,*
  - *32 one-bed apartments,*
  - *1.42-place creche*
  - *All associated ancillary development and works including one vehicular entrance, footpaths, cycle paths, bike and bin stores, parking, drainage, landscaping and amenity areas.*
-

**Bord Pleanála Case reference: JP04.320648**

**This submission relates to Cork County Council's application for approval to An Bord Pleanála under Section 177AE of the Planning and Development Act, 2000 (as amended) and the requirements of the Planning and Development Regulations 2001 (as amended) to undertake the development as outlined above and I wish to make submissions and observations in relation to the proposed development.**

**This submission is on behalf of residents of St. Joseph's Road and associated existing housing estates.**





## **Submissions and Observations**

**Cork County Council's proposed development of 74 houses and 64 apartments  
Ard an Ghleana, St Josephs Rd., Mallow will:-**

- not provide high quality residential, working and recreational environments, supported by a good range of services and community facilities due to the total lack of local community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, poor and unsafe pedestrian footpaths, no cycle paths, and no local public transport in the local St. Joseph's Road area.
- further contribute to the existing severe lack of recreational facilities, recreational infrastructure, green infrastructure, neighbourhood amenities and enhanced connectivity in the local St. Joseph's Road area.



## Bord Pleanála Case reference: JP04.320648

Cork County Council Development Plan 2022 gives guidance on car parking standards for new developments. Table 12.6 of the Plan sets the car space allocation for various types of development including residential developments. Table 9.1 below shows a schedule of car parking spaces as set out by the Cork County Development Plan. Table 10.1 below shows a schedule of car parking spaces as set out by the Development Plan.

Land Use Category	Cork County Council Development Plan 2022-2028 - Car Parking Standards	Total Spaces Per Unit	Total Units	Parking spaces required
<b>RESIDENTIAL</b>				
74 House	2 spaces per unit	2	74	148
66 Apartments	1.25 spaces per unit	1.25	66	83
Creche	1.0 spaces per 3 staff	0.333	10	3
Creche	1.0 spaces per 10 children	0.1	42	4
<b>Total</b>				<b>238</b>

Table 10.1: Car parking allocation as per the Cork County Council Development Plan

VEHICLE PARKING SPACES - HOUSING			
Unit Types	No. of Units	Parking x Units	Total Parking
4 bed semi-detached	4	2no. parking spaces per unit	8
3 bed semi-detached	14	2no. parking spaces per unit	28
3 bed end townhouse	20	2no. parking spaces per unit	40
2 bed end townhouse	2	1no. parking spaces per unit	2
2 bed mid townhouse	34	1no. parking spaces per unit	34
<b>TOTAL NUMBER OF PRIVATE PARKING SPACES</b>	<b>74</b>		<b>112</b>
<b>TOTAL NUMBER OF VISITOR PARKING SPACES</b>			<b>5</b>
This equates to 1.58 spaces per house			
VEHICLE PARKING SPACES - APARTMENTS			
Unit Types	No. of Units	Parking x Units	Total Parking
2 bed duplex	12	1no. parking spaces per unit	12
1 bed of apartment	12	0.7no. parking spaces per unit	7
<b>TOTAL NUMBER OF PRIVATE PARKING SPACES</b>	<b>64</b>		<b>15</b>
<b>TOTAL NUMBER OF VISITOR PARKING SPACES</b>			<b>3</b>
This equates to 0.9 spaces per apartment			
VEHICLE PARKING SPACES - CRECHE			
Unit Types	No. of Units	Parking x Units	Total Parking
42 Child Creche	1	1no. parking spaces per 3no. staff & 5no. parking spaces per 10no. children	8
<b>TOTAL NUMBER OF PARKING SPACES</b>	<b>1</b>		<b>8</b>
<b>TOTAL NUMBER OF CAR PARKING SPACES (ENTIRE SITE)</b>			<b>183</b>
NOTE: The total number of parking spaces can be reduced by 38no. if the 4 & 3 bed units are provided with 1no. parking spaces per unit. This shall reduce the total number of car parking spaces for the entire site to 145no. parking spaces			

Table 10.2: Suggested Car parking allocation

- The above extract from Cork County Council's Transport Plan for the proposed LRD will generate an additional volume of upwards of 300 vehicles per day, (including delivery and visiting traffic), accessing/egressing the private estate of Aldworth Heights and St. Joseph's Road. A further private developer LRD development of upwards of 450 dwellings in Castle Park, St. Joseph's Road, is also in the planning application stage with Cork County Council. This will generate an additional 550 vehicles per day, (including delivery and visiting traffic), on St. Joseph's Road. Combined increased volumes of traffic on St. Joseph's Road will total an additional 850 vehicles per day. Currently St. Joseph's Road is in a very poor condition and doesn't cater for the existing volume of traffic. St. Joseph's Road also lacks safe and adequate pedestrian and cyclist ways, not to mention having very poor street lighting. The bottom of St. Joseph's Road realises a consistent gridlock traffic barrier. See detailed analysis further down on Traffic statistics in the overall area.

## **Bord Pleanála Case reference: JP04.320648**

**The proposed LRD of 74 houses and 64 apartments is premature given the following local realities in the local St. Joseph's Road areas:-**

- St. Joseph's Road areas lack neighbourhood centres and amenities to support further LRD in the local area.
- St. Joseph's Road has an immediate need for better roads infrastructure, street lighting, safe pedestrian walkways, cycle paths, public transport, neighbourhood centres, quality local services and supports, which are key prerequisites to all future LRD in the St. Joseph's Road area.
- 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 on St. Joseph's Road.
- 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 St. Joseph's Road residential areas and the town centre are an essential prerequisite to any future LRD's anywhere on St. Joseph's Road.
- 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 on St. Joseph's Road.
- Both access/egress roads from all estates onto St. Joseph's Road are already at full capacity at peak hours and adding extra vehicular movements on St. Joseph's Road, (currently a very busy and heavily-trafficked route, which already serves high vehicular movement, from Fermoy, Mitchelstown and existing local high density housing estates, to and from Mallow Town), will create an unacceptable road traffic hazard and will significantly compromise public safety and further reduce the carrying capacity of St. Joseph's Road, which is currently barely able to cope with localised traffic and lacks safe pedestrian and cycle routes. Indeed, St. Joseph's Road is currently well below acceptable and safe road specifications and standards for existing levels of vehicular traffic, cyclists and pedestrians.
- Existing estates' access/egress roads/junctions, with St. Joseph's Road, have very limited sight distances and pose a constant traffic hazard to traffic in the area.
- The Development as proposed, at Ard an Ghleana, 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

## **Bord Pleanála Case reference: JP04.320648**

development, together with associated light and heavy commercial vehicles associated with domestic deliveries/collections.

- The construction of the development as proposed Ard an Ghleana, 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, Ard an Ghleana, 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 parts of the existing Castle Park estate on St. Joseph's Road.
- St. Joseph's Road residents are pleased to see that Cork County Council recognise the 10 minute town concept. The proposed location of the Ard an Ghleana, development creates a 35 minute town concept, uphill out of the proposed estate and downhill to the town centre, with the reverse experience out of the town centre.
- Another point to note is that little or no progress has been achieved with capacity being accommodated via addressing vacancy within the existing building stock (including through Living Over the Shop) and via opportunities within the Existing Built Up Area of the town.
- Similarly little or no progress has been achieved in absorbing existing significant capacity within the existing building stock and urban fabric of the town to deliver additional residential uses which can reinforce the delivery of a compact town centre.
- **St. Joseph's Road and Aldworth Heights Residents .....**
  - ..... strongly feel that residential zones will not function or flourish in locations which totally lack community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, pedestrian and cycle paths, and local public transport. All these services and amenities do not exist anywhere on St. Joseph's Road.
  - ..... have serious concerns that the proposed Ard an Ghleana, St. Joseph's Road, development location will not meet the Place- Making and Sustainable Communities Model, in key areas including, Well Connected, Well Served, Active, Inclusive and Safe, and Fair for Everyone.

## Bord Pleanála Case reference: JP04.320648

- ..... are of the opinion that the proposed St. Joseph's Road Development location will not meet many of the principles of Placemaking in key areas which include, Character and Identity, Quality of the Public Realm/Open Space, and Ease of Movement.
- .....submit that the Ard an Ghleana, St. Joseph's Road, development location will not meet many Placemaking Design Standards in key areas including Settlement Pattern, Urban Form, Urban Space and technical Issues.
- .....continue to experience a severe lack of recreational facilities, recreational infrastructure, green infrastructure, neighbourhood amenities and enhanced connectivity. St. Joseph's Road and Aldworth Heights Residents feel that St. Joseph's Road is in a very poor condition and lacks the ability to cater for large volumes of traffic, it also lacks safe and adequate pedestrian and cyclist ways, not to mind, poor street lighting.
- .....constantly realise the lack of neighbourhood centres in the local area and thus have no real sense of place along with continuously experiencing a severe lack of local services and communities. Currently all existing residents suffer from a lack of neighbourhood centres and increasing housing stock and population in the area is further compounding the lack of facilities and services:
- ..... Strongly assert that better roads infrastructure, street lighting, safe pedestrian walkways, cycle paths, public transport, neighbourhood centres, quality local services and supports are a prerequisite to all future housing development in the area.
- ..... feel very strongly that all related new roads be constructed and existing roads be upgraded before the development of additional LRD's on St. Joseph's Road. The construction of the Mallow Relief Road and associated roads infrastructure is a key cog to support future LRD's in the St. Joseph's Road area.
- .....worry about the current/future provision of wastewater, surface water and the management of water quality in the area given the current location of the proposed St. Joseph's Road development and indeed, future housing developments in the St. Joseph's Road area.
- .....that the proposed development is contrary to the proper planning and sustainable development of the area.
- The entrance to the proposed Ard an Ghleana development via the private estate of Aldworth Heights onto St. Joseph's Road is already at full capacity, as it was designed only to serve traffic generated from the existing 26 houses in Aldworth Heights. Adding extra vehicular movements at this junction with St. Joseph's Road, currently a very busy and heavily- trafficked route, which already serves high

## **Bord Pleanála Case reference: JP04.320648**

vehicular movement, from Fermoy, Mitchelstown and existing local high density housing estates, to and from Mallow Town, will create an unacceptable road traffic hazard and will significantly compromise public safety and reduce the carrying capacity of St. Joseph's Road, which is currently barely able to cope with localised traffic and lacks safe pedestrian and cycle routes. Indeed, St. Joseph's Road is currently well below acceptable and safe road specifications and standards for existing levels of vehicular traffic, cyclists and pedestrians.

- The proposed access road via the private estate of Aldworth Heights is constrained by established housing left and right of Aldworth Heights entrance, extremely limited lines of sight when accessing/egressing onto St. Joseph's Road and the narrow width of St. Joseph's Road itself, a danger to existing two way traffic on the road Aldworth Heights drivers. The junction of Aldworth Heights estate's access road to St. Joseph's Road is narrow and has poor sight distances as a result of constraints from the earlier housing. The absence of a footpath on this side of St. Joseph's road at the junction further limits sight distances and provides a poor environment for pedestrians
- The existing 6m wide road in Aldworth Heights provides minimum access to the estate of 26 houses. It was not designed to act as a distributor road for any housing that may be developed on lands adjoining the estate. Indeed Aldworth Heights Residents' earlier submission to Mallow UDC, in 2007, clearly stated that, in the residents opinion, the current road width is inadequate for their needs. This situation is exacerbated when visitors to the estate park on the street and at a pinch point on the first internal junction in the estate. A further reality check is the difficulty for HGV's, Fire Brigades and Ambulances, etc accessing/egressing and manoeuvring in the existing Aldworth Heights estate.
- Aldworth Heights Residents are of the firm opinion that the road within the estate of 26 detached homes is a private road within a cul-de-sac network and that all Aldworth Heights services are privately maintained services. This road is not suitable either as an access or distributor road for the lands adjacent to the estate. Indeed current vehicular access/egress through/to/from the estate is so tight that it is with continuous difficulty that vehicular traffic can pass each other. This ongoing problem is even more pronounced with big vehicles deliveries/collections.
- In the north east corner of Aldworth Estate there is a gateway which leads on to the proposed Ard an Ghleana development (at the turning 'hammer head' on the road). Ostensibly this provides access to those lands. From Aldworth Heights Residents' perspective, access rights are for agricultural use only. The existence of the gate does not in itself confer ubiquitous access rights to the lands.
- Regardless of this the road from the gateway leading onto Aldworth Heights is at its narrowest at this point where a small kink in the road tightens crossing distances. In the absence of a median strip between this road and



## **Bord Pleanála Case reference: JP04.320648**

the three houses facing it, it is difficult to envisage how an appropriate distributor road can be constructed at this location that can provide safe carriageway into the lands of the proposed LRD.

- The Development as proposed will create an unacceptable traffic hazard, by changing the character of Aldworth Heights, from a cul-de-sac estate to a through road estate, thus materially interfering with the residential amenity of existing houses.
- The Development as proposed will create a further unacceptable traffic hazard, in Aldworth Heights, 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 site layout as proposed will lead to loss of privacy and residential amenity for the occupiers and owners of the houses, in Aldworth Heights, which back onto the site, through overlooking and noise nuisance.
- The proposed development will adversely alter the character of Aldworth Heights which is a mature estate of 25 substantially identical detached dormer bungalows and one detached bungalow. The proposal is for high density of both terraced and semi-detached houses, together with apartments, of modern design and appearance which, if permitted, will lead to an incongruous combination of architectural styles and thus contravene proper planning and development.

**Having carefully reviewed Cork County Council's Cork County Development Plan 2022 and previous development plans, St. Joseph's Road residents have serious concerns and issues, with Cork County Council's proposed development of 74 houses and 64 apartments at the Ard an Ghleana LRD. Such key issues include:-**

1. Density in a site location, (devoid of community amenities, neighbourhood centres, public transport etc.), that links directly on to St. Joseph's Road, a narrow road which does not have the proper infrastructure to support. (e.g. roads, safe pedestrian routes, cycle lanes, community amenities, neighbourhood centres, public transport etc.). All these services and amenities, detailed as essential prerequisites in the Cork County Council Development plan 2022 to 2028, do not exist anywhere in Castle Park or the local St. Joseph's Road area.
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 area.
3. Given 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, the proposed development would endanger public safety on St. Joseph's Road, by reason of traffic hazard, and would therefore be contrary to the proper

## **Bord Pleanála Case reference: JP04.320648**

planning and sustainable development of the area, due to the current unsafe standard of St. Joseph's Road together with existing traffic volumes and congestion, especially at peak times.

### **Additional St. Joseph's Road residents' issues and concerns regarding Cork County Council's proposed development of 74 houses and 64 apartments include:**

- The proposed LRD development will result in a substandard form of development for future occupiers in terms of lack of local residential amenities and thus give rise to a poor standard of development.
- 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.
- Local residents have very strong concerns on the current standard of St. Joseph's Road and its existing vehicular traffic density. St. Joseph's Road 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 St. Joseph's Road estates and existing housing stock on St. Joseph's Road are above capacity for St. Joseph's Road, 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 as a Rat Run on a daily basis. Such commercial vehicular traffic includes Light Weight/HGV/Articulated traffic. Further traffic congestion is dominant with funerals to St. Joseph's Cemetery and when GAA, Soccer and Rugby matches are played at the three club venues on the eastern end of St. Joseph's Road. **Indeed transport reports have identified that St. Joseph's Road is a constant "rat run" for non local traffic, HGV's etc.**
- The town end of St. Joseph's Road runs into a near cul-de-sac of a narrow laneway road, at Bridewell Lane for all local and non-local traffic on St. Joseph's Road heading to Bridge Street and beyond. Not to mind St. Joseph's Road traffic delays at the Clock House T-Junction for vehicles heading to the town centre, via Muddy Hill and beyond. Indeed local and non-local traffic volumes from Mallow Road/Spa Glen into Bridge Street further add 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.

## Bord Pleanála Case reference: JP04.320648

- Looking at the broader area of St. Joseph's Road and Spa Glen, 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.
- Through this submission to An Bord Pleanála, we respectfully invite Bord Pleanála representatives to visit our area and see for yourself current and future realities, should LRD's be approved without proper road infrastructure, safe and efficient access/egress for local residents - vehicular, cyclist and pedestrian.

### Future Traffic Densities and Gridlock - Increased Traffic Volume Density Projection

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	
<b>Totals</b>	<b>1294</b>	<b>1940</b>	<b>2570</b>	<b>2553</b>	<b>227</b>	<b>2480</b>	<b>2480</b>

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

## Bord Pleanála Case reference: JP04.320648



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 1600 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**

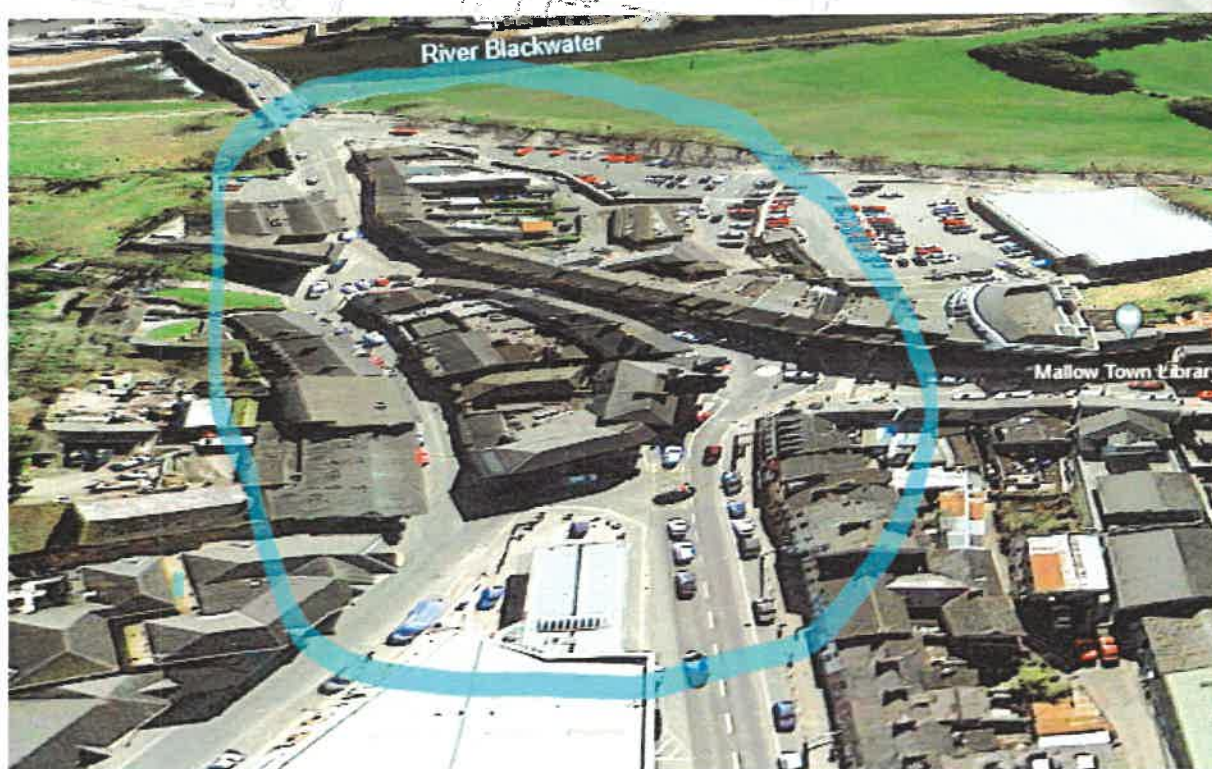
**Red SG Additional 980 Vehicles per Day**



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**

## Bord Pleanála Case reference: JP04.320648

- 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 Ard an Ghleana.
- 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.**

## Integrated Approach

### 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**



## Bord Pleanála Case reference: JP04.320648

### 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 - Private Developer (900 units)**

All of the areas shown are zoned for current and future housing LRD - over the next 5 to 7 years. (2025 to 2032). **Note** - Castle Park Development of 450 units is not included in the above map and descriptive.

To achieve a good and balanced planning outcome, all proposed LRD's should be designed to integrate for balanced and practical planning and development. One can assume that the future private developments will include community amenities, shops, creches, etc.

### **Strategic Planning**

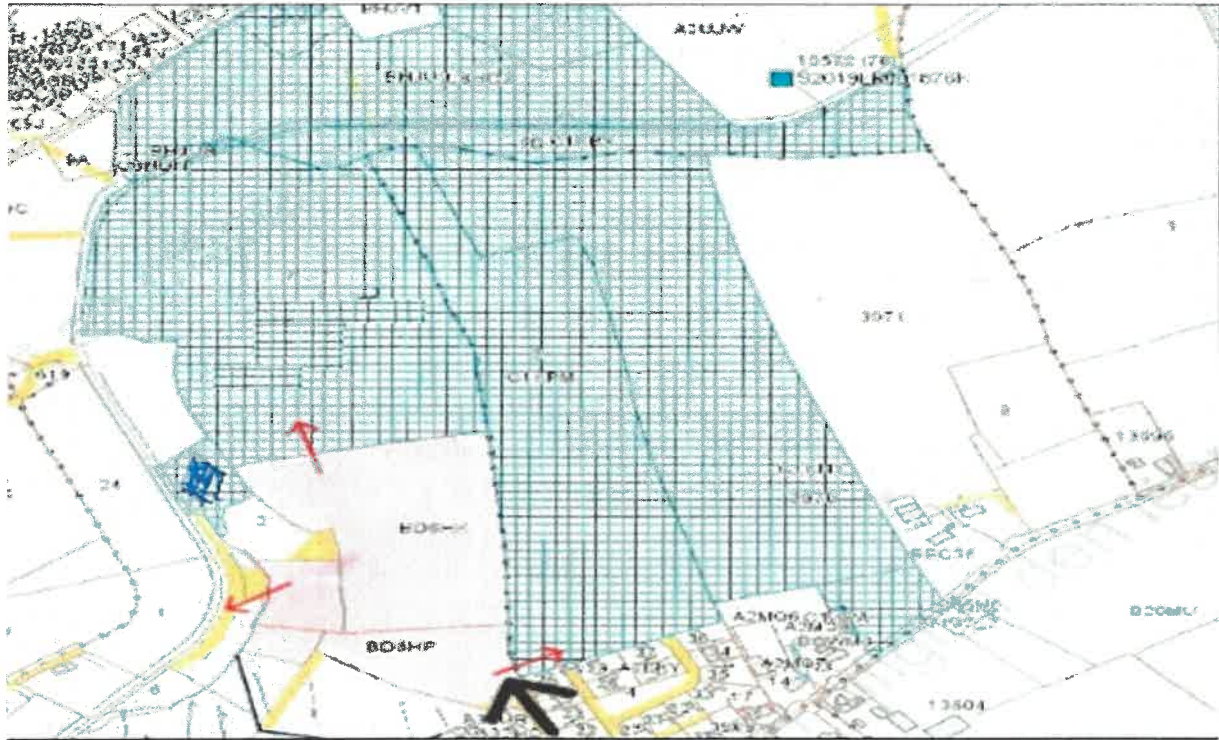
<https://lda.ie/strategic-planning> refers

### **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.

Cork County Council proposed LRD and O'Flynn Developers adjoining proposed LRD

Map B - Folio Details



Map A

Legend - Map A

**Pink Land Area** - Site for proposed Cork County Council high density housing.

**Green Graph Land Area** - Land owned by O'Flynn Developments and earmarked for current and future high density housing.

**Black Arrow** - Cork County Council planned access/egress through Aldworth Heights private cul-de-sac estate, for construction traffic, and permanently, for all traffic to and from the completed high density housing.

**Red arrows** - Cork County Council's proposed integration roads to accommodate private developers' high density housing.

- Cork County Council plans to provide **integrating road connections within its proposed high density social and affordable housing, to accommodate current and future high density housing developments by O'Flynn Developments**, in their lands adjoining Cork County Council's site. (See red arrows on Map above). This will result in a **traffic volume** of upwards of 550 houses accessing/egressing St. Joseph's Road, through the private estate of Aldworth Heights.
- A logical consequence of this should be that the proposed Cork County Council LRD should be **integrated and built at the same time** as O'Flynn Developments future LRD 2 **makes access/egress from the Spa Glen a more feasible option, than through Aldworth Heights**. Indeed future occupiers of the Cork County Council

## Bord Pleanála Case reference: JP04.320648

development will have closer and more immediate access to Mallow Town Centre and associated amenities, with access/egress from the Spa Glen.

### Further background

**Folio No. CK121773F - Pink Area on Map Folio No. CK137552F - Green Graph Area on Map**

1. Development at Folio No. CK121773F would be **premature** ahead of potential future development at Folio No. CK137552F. The lands at Folio No. CK137552F is in the ownership of the development company "O'Flynn Construction Co." who will in the short and medium future be developing the lands in Folio No. CK137552F with high density housing. Given the fact that these lands bound the N72 a contingency plan should be put in effect that **links** to the land at Folio No. CK121773F and all infrastructure connections should be built in order to carry the traffic of both developed sites. Cork County Council's intention to use an already completed housing development as small as "**Aldworth Heights,**" - a private estate, is **neither practical nor feasible, and would structurally undermine the existing private entrance road** to Aldworth Heights; not to mind creating a subsidence threat to existing houses within Aldworth heights. The right of way access, private entrance road, to Aldworth Heights has already been damaged by the traversing of large machinery, namely the distortion of road surfaces, to lands at Folio No. CK121773F. As a result, there is now increased ponding outside the residence at No.11 Aldworth Heights.
2. **Existing infrastructure in Aldworth Heights is of insufficient standard.** The existing road surfaces will not be capable of catering for traffic to a high density development. Nor will the road structurally support the heavy construction machinery and delivery vehicles required to build the high density development.. When the estate of Aldworth Heights was built the road network within the estate was built to cater to the vehicles of 26 detached houses, in total, and the use of the Right of Way to the land behind was intended for access to agricultural lands. Had the intention been to access a development of high density housing, **Cork County Council would have made it a condition of the Planning Permission granted that the infrastructure would have had to be built to a much higher standard.** Indeed for the past 20 years, Aldworth Heights has been a private estate, serviced and maintained by local residents' financial contributions and continues to be a private estate. Footpaths and road widths within Aldworth Heights do not meet current regulations for housing developments. If it is the intention of Cork County Council to upgrade works to the Aldworth Heights private road network, works will cause **massive upheaval to the existing long term residents of the private estate.**

3. Development of lands in Folio No. CK121773F will cause a **drop in air quality** in the immediate area and generate copious amounts of **construction dust** in the local neighbourhoods, at the construction stage of the high density development. **Construction machinery and delivery vehicles** will also contribute to high volumes of local pollution and a drop in air quality. A potential of **ground pollution** also exists through leaking of diesel storage tanks and oil and diesel spillage from vehicles. In a currently existing biodiversity area it would be very upsetting to see this happen. This will cause great upset to families in the private estate of Aldworth Heights, who will be in the immediate frontline of all construction works.
  
4. There is **very high potential for structural damage to existing houses in Aldworth Heights. With this in mind, some residents** are carrying out structural surveys on their homes to safeguard the structural integrity of their houses. Subsidence is a well known problem on St. Josephs Road to the point that some houses in the local area are unable to avail of house insurance. Large excavation work in the lands at Folio No. CK137552F provides a real threat of structural damage to the houses in Aldworth Heights closest to the future development. The constant flow of HGV and Artic delivery vehicles coupled with heavy construction machinery could also potentially cause local subsidence and structural damage to existing houses in Aldworth Heights..

### **Part 8 Application?**

Local Residents of St. Joseph's Road and Aldworth Heights had been informed by local public representatives that a Part 8 application process would be applied to the proposed LRD, Ard an Ghleana. Local Residents have now discovered through the site notice and newspaper notice that it is a Section 177EA application to An Bord Pleanala.

Having stated that, local residents have now also realised that Cork County Council intend to apply for a Part 8, to enable access to the development through the private road, (never taken in charge by Cork County Council in 22 years), of Aldworth Heights, St. Joseph's Road, Mallow, Co. Cork.

Thus the current Section 177AE to An Bord Pleanala is restricted to the confines of the site boundaries for the LRD proposed development, namely, Ard an Ghleana. Local residents are of the opinion that this is taking the "cart before the horse."

Cork County Council's Part 8 Application process should be the first step in the planning process, followed by their Section 177AE application to Bord Pleanala.

A Part 8 application gives local residents the opportunity to present their viewpoints on how impractical such an entrance through Aldworth Height's private road would be, whilst also promoting alternative proposals for access/egress to the proposed LRD, Ard an Ghleana.



**Proposed Entrance through the privately owned right of way/way of leave in the private estate, (never taken in charge by Cork County Council in 22 years), of Aldworth Heights, St. Joseph's Road, Mallow, Co. Cork.**



**Road Safety Audit  
Stage 1/2  
for  
ACCESS TO PROPOSED RESIDENTIAL DEVELOPMENT  
AT  
ARD AN GHLEANNA, MALLOW, Co CORK.**

**Date:** July 2024

**Report produced for:** Martin Hanley Traffic & Transportation

**Report produced by:** Road Safety Matters Ltd.

---

Extract 1



**BACKGROUND INFORMATION**

The report which follows is the Stage 1/2 Combined Detailed Design Road Safety Audit for the access to a proposed residential development site of 138 housing units in Mallow, Co Cork, based on the information supplied to the RSA Team as detailed below. The proposals involve an extension to an existing access road to the Aldworth housing estate from St Joseph's Road (L1220), and construction of an internal road network and surface car parking to serve the proposed development, to include footways, road markings, signage and all associated ancillary works. The extent of the Road Safety Audit is confined to the red line on the preliminary design drawings supplied for the site, and does not include the entrance onto St Josephs Road, which will be upgraded under a granted Part 8 planning application and will be subject to a separate RSA Report.

Extract 1 from the RSM report clearly shows that Cork County Council intend to apply for a Part 8, to enable access to the development through the private road, (never taken in charge by Cork County Council in 22 years), of Aldworth Heights, St. Joseph's Road, Mallow, Co. Cork.

Thus the current Section 177AE to An Bord Pleanála is restricted to the confines of the site boundaries for the LRD proposed development, namely, Ard an Ghleana.

Local residents are of the opinion that this is taking the "cart before the horse."

Cork County Council's Part 8 Application process should be the first step in the planning process, followed by their Section 177AE application to Bord Pleanála.

This gives local residents the opportunity to present their viewpoints on how impractical such an entrance through Aldworth Height's private road would be, whilst also promoting alternative proposals for access/egress to the proposed LRD, Ard an Ghleana.

This overall submission includes detailed proposals by local residents, for **integrated planning** connecting with the future roads and services of private developers in lands abutting the Ard an Ghleana site. Indeed local residents are at a loss as to why Cork County Council do not see the bigger picture of private developers LRDs neighbouring the site for the proposed Ard an Ghleana LRD.

Indeed Cork County Council's current 177AE application details proposed road connections to the private developers future LRD abutting Ard an Ghleana proposed LRD, with all site services, (sewage, storm water, etc.), following the steep gradient fall to the Spa Glen road. No doubt the private developer will avail of these services for connections to its private LRD in the future.

The current right of way road entrance to Aldworth Height is below specifications and in breach of DMURS regulations as an entrance to the proposed LRD - Ard an Ghleana. The current road in the overall Aldworth Heights estate was designed for the cul-de-sac estate of 26 detached dwellings. This has led to constant challenges for HGV, delivery vehicles, refuse collection vehicles, fire brigade vehicles, etc.

## **Bord Pleanála Case reference: JP04.320648**

**See map 1 below, of Aldworth Heights Estate and a photo montage of the estate showing the private road to the estate.**

Aldworth Heights is a private estate which was never in charge by Cork County Council, in its 22 years of existence, is managed and maintained by estate residents. The road section of Aldworth Heights from the public road entrance to the boundary of the proposed Ard an Ghleana LRD is a private road. Residents of Aldworth Heights have additional particular issues and concerns regarding the proposed LRD, Ard an Ghleana, which are detailed in this overall submission.

Local residents of Aldworth Heights and St. Joseph's Road are opposed to the entrance of Aldworth Heights being used as a main road access/egress to the proposed Ard an Ghleana LRD for reasons stated above and for further issues and concerns as stated in this overall submission.

Please also refer to **Addendum 1 - Within the Consultation Document for Engineer's Report as submitted to Cork County Council - May 2007** with regard to the total unsuitability of Aldworth Heights Estate Entrance Road as a public road for the proposed LRD. This report also proposed alternatives for LRD main entrance.



**Map 1 - The red arrow in map 1 below shows the access point.**

Photo Montage of Aldworth Heights Entrance









### **Cork County Council's Development Plan-2022 to 2028**

**Having carefully reviewed Cork County Council's Cork County Development Plan 2022 and previous development plans St. Joseph's Road and Aldworth Heights Residents have serious concerns and issues, with Cork County Council's proposed development of 74 houses and 64 apartments at Ard an Ghleana, on St. Joseph's Road. Such key issues include:-**

1. Density in a site location that **does not have the proper infrastructure** to support. (Roads, safe pedestrian routes, cycle lanes, community amenities, neighbourhood centres, public transport etc.)
2. The proposed development location is in breach of the **10 minute rule** as detailed in Cork County Council Development plan 2022 to 2028
3. The proposed development location will **not meet the Place- Making and Sustainable Communities Model.**
4. The proposed development location will **not meet many of the principles of Placemaking.**



## Bord Pleanála Case reference: JP04.320648

5. The proposed development location will **not meet many Placemaking Design Standards.**
6. **Site contours and gradients**, as detailed in the design drawings are not conducive to cost effective house construction costs given the estimated additional minimum cost of 2m euro plus to bring houses to floor level and to install efficient site services.
7. **Site contours and gradients**, as detailed in the design drawings, will create a daily challenge for pedestrian access/egress to essential town services, (schools, shops, pharmacies, etc), given that it is 35 minutes walk to the town centre, egressing the estate with 50 to 70 ft of ascent and egressing the town centre, on the return walk, with another 100ft to 120 ft ascent on St. Joseph's Road.
8. The proposed development will have a **negative impact on the wider visual impact of the area** counteracting Landscape 2.4.43 as detailed in the Cork County Council Development plan 2022 to 2028
9. The proposed development will not function or flourish in the proposed location which totally **lacks community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, pedestrian and cycle paths, and local public transport.** All these services and amenities, detailed as essential prerequisites in the Cork County Council Development plan 2022 to 2028, do not exist anywhere on St. Joseph's Road.
10. In line with 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, it is absolutely essential that **all related new roads be constructed and existing roads be upgraded before the development of additional housing on St. Joseph's Road.** The relief road is a key cog in this policy wheel and the alternative location of the St. Joseph's Road development, together with the Mallow/Fermoy road realignment, as outlined in our consultation document, will be a very feasible, practical and safe access road from Mallow Town and local surrounds to connect with the Mallow Relief Road.
11. Given 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, the proposed development would **endanger public safety by reason of traffic hazard, and would therefore be contrary to the proper planning and sustainable development of the area**, due to the current unsafe standard of St. Joseph's Road.
12. The proposed current development location will result in a **substandard form of development for future occupiers in terms of lack of local residential amenities, would give rise to a poor standard of development, and would seriously detract from the character and pattern of development in the area.**
13. The proposed current development location, despite the land being zoned residential, would be **overly car dependent**, as the peripheral location, the **lack of**

**adequate, safe pedestrian and cycle linkages, and adequate bus connections** within the outer area of the town, would leave all residents dependent on cars.

14. The proposed current 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.”**

### **Design Manual for Quality Housing From Department of Housing, Local Government and Heritage - Addendum 3**

The proposed current development location for the St. Joseph's Road Development, Ard an Ghleana, is not in tune with the key areas of the **Design Manual for Quality Housing From Department of Housing, Local Government and Heritage - Addendum 3** - Design Manual for Quality Housing From Department of Housing, Local Government and Heritage. Published on 21 January 2022 and last updated on 21 January 2022:

**Extracts have been copied from Addendum 3, (see bold font below),** in support of St. Joseph's Road and Aldworth Heights Residents' Design Stage Consultation Document Submission to Cork County Council.

**Cork County Council's proposed Ard an Ghleana development of 74 houses and 64 apartments contravenes the Design Manual for Quality Housing From Department of Housing, Local Government and Heritage - Addendum 3 in the following areas:-**

- **A key disadvantage of this site from a topographical feature, is a slope of upwards of 60 ft from south to North, with a 40ft fall from east to west.** This will result in at least an additional 8m euro investment in dead work to get dwellings to a finished floor level. There will also be an additional cost of at least 5m euro to install site services.
- In addition to having an appropriate zoning for residential development, the **site should be located close to as wide a range of facilities as possible, with the general minimum proximity to a school, shop and means of public transport.**<sup>4</sup>
- It is normally accepted that **a ten-minute walk's distance, or about one kilometre, is the standard for what is considered proximate.**
- **Out-of-sequence development** at a remove from the existing town or village built fabric, so called 'leapfrogging', is not consistent with planning policy<sup>6</sup> and should be avoided.
- **Peripheral locations are not generally supported,** as their development is inconsistent with planning guidance and can **place an unreasonable burden on residents who may not have access to private transport.** Consistent with the

## **Bord Pleanála Case reference: JP04.320648**

Project Ireland 2040 - National Planning Framework (NPF), town centres, **brownfield sites and other locations with easy access to facilities are favoured.**

- Local authorities should be mindful of the **extent to which facilities are available for tenants who may not have access to private transport.**
- QHfSC does note that before deciding on the location of social housing, **careful consideration should be given to both the cost and the practicality of providing sewage and water supply.**
- **The site should preferably be relatively flat or have slopes which will allow development without the need for extensive earthworks or substantial retaining walls.**
- The current proposed location for the St. Joseph's Road Development, Ard an Ghleana, does not comply with key areas of the **Design Manual for Quality Housing From Department of Housing, Local Government and Heritage**, as detailed above.
- Local residents have very strong concerns on the **current standard of St. Joseph's Road and its existing vehicular traffic density. St. Joseph's Road has reached its peak capacity** and is not suitable for further high density housing developments and its associated increase in traffic volumes.
- This clearly indicates that **current traffic volumes from these houses is above capacity for St. Joseph's Road**, and this capacity is at breaking point with the additional vehicular traffic using the road travelling to and from Fermoy/Mitchelstown and beyond. Such vehicular traffic includes Light Weight/HGV/Articulated traffic. Further traffic congestion is dominant with funerals and when GAA, soccer and rugby matches are played at the three club venues on the eastern end of St. Joseph's Road. **The pending next Castlepark development, stage of 400 houses will also add further and unmanageable vehicular capacity to St. Joseph's Road.**

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

**Cork County Council's proposed development of 74 houses and 64 apartments at Ard an Ghleana, St. Joseph's Road, 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—

**Bord Pleanála Case reference: JP04.320648**

(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—

## **Bord Pleanála Case reference: JP04.320648**

- (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 to local St. Joseph's Road residents' issues, concerns and objections with regards to Cork County Council's proposed development of 74 houses and 64 apartments at Ard an Ghleana, St. Joseph's Road, Mallow, Co. Cork.**



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

Original draft proposals and designs for an LRD by Cork County Council were for housing only within the site on St. Joseph's Road, Mallow, Co. Cork. This aim was to ensure a balanced enhancement with the local area which is made up of detached dwellings with the exception of Castle Park which is currently an LRD of upwards of 600 houses - detached and semi detached. 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 Oidhreachta**  
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

Local residents on St. Joseph's Road and in Aldworth Heights feel that the proposed LRD at Ard an Ghleana with its mix of 74 houses and 64 - one and two bedroom apartments does not reflect a balanced enhancement approach to planning the LRD and does not reflect the local area which is totally comprised of detached dwellings with the exception of Castle Park which is currently an LRD of upwards of 600 houses - detached and semi detached.

The proposed LRD at Ard an Ghleana with its mix of 74 houses and 64 - one and two bedroom apartments does not 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.

## **Bord Pleanála Case reference: JP04.320648**

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:-**

<b>Relevant Extracts from Section 2.0 Apartments and Statutory Development Plans</b>	<b>Local Residents Comments</b>
<p>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.</p>	<p>Agreed</p>
<p>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</p>	<p>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.</p>
<p>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.</p>	<p>Cork County Council's Section 177AE LRD application, Ard an Ghleana, does not reflect 2.1 above.</p> <p>Cork County Council has completely failed in refurbishment of existing buildings in the Mallow Town Centre.</p>
<p>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:</p> <p>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</p>	<p>The proposed site location is not suitable.</p> <p>The proposed site location is not central and/or accessible</p>

**Bord Pleanála Case reference: JP04.320648**

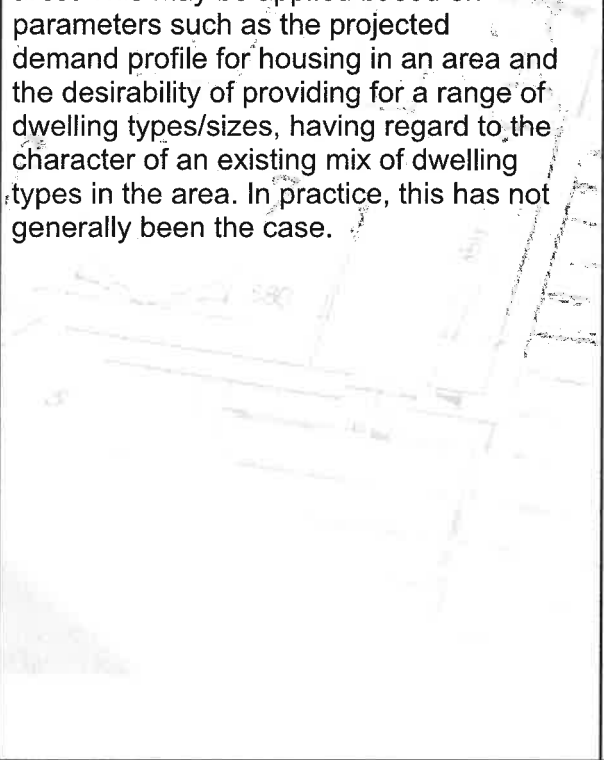
<p>wholly comprise apartments, including:</p> <ul style="list-style-type: none"> <li>• Sites within walking distance (i.e. up to 15 minutes or 1,000- 1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;</li> <li>• Sites within 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 hour frequency) urban bus services or where such services can be provided;</li> <li>• Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour</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>The proposed site location is a minimum of 20 mins to low frequency country bus services.</p>

**Bord Pleanála Case reference: JP04.320648**

<p>frequency) urban bus services.</p> <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 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 138 units has 64 apartments and 74 houses. This contradicts the planning factor of a minority of apartments. Apartments make up 46% 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 Cork County Council.</p>
<p>2.13 This means that as well as being an overriding social issue, urban housing supply, especially the provision of apartments in our key cities, is a critical strategic competitiveness issue that statutory Development Plans must address.</p>	<p>Mallow Town is a North Cork County Town and not a City.</p>



**Bord Pleanála Case reference: JP04.320648**

<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 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 138 units has 64 apartments and 74 houses. This contradicts the planning factor of a minority of apartments. Apartments make up 46% 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 and in Aldworth Heights feel that the proposed LRD at Ard an Ghleana with its mix of 74 houses and 64 - one and two bedroom apartments <b>does not reflect a balanced enhancement approach to planning the LRD and does not reflect the local area which is totally comprised 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><b>Extract 4.0 Communal Facilities in Apartments</b></p>	<p><b>Local Residents Comment</b></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</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</p>

## Bord Pleanála Case reference: JP04.320648

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.

speeding traffic and rat run speeding non-local traffic.

0.0001 of 1% cycle St. Joseph's Road and these are usually hardened long distance racing cyclist enthusiasts.

There are no cycle lanes anywhere in the St. Joseph's Road area and indeed nowhere in the Mallow Electoral area.

Promoting bicycle spaces for future residents to use bicycles, (and indeed EScooters, as proposed in the Residential Travel Plan, as submitted with the application to Bord Pleanala), as a key mode of transport, is an open invitation for serious injury and fatalities, in the local area, in the short, medium and future.

**Map shows remoteness reality for pedestrians of the site location for the proposed LRD Ard An Ghleana, St. Joseph's Road, Mallow, Co. Cork.**



**White - Site Location: Purple - Town Centre: Red - Bus Stop: Light Blue - Railway Station: Green - Supermarkets: Orange - National Schools: Blue - Secondary Schools**

The current proposal to include 64 one and two bedroomed apartment so remote from Mallow Town Centre, public transport, essential services, such as supermarkets, GP's, Dentists, etc., will pay a disservice to residents of the apartments and houses, the majority of whom may not have a car and will have to face the daily challenge and risk to life and limb on a steep and dangerous St. Joseph's Road's or pay for Taxis on a regular basis, thus eroding their discretionary income base.

## 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 St. Joseph's Road, Ard an Ghleana 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"

## **Bord Pleanála Case reference: JP04.320648**

### **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 St. Joseph's Road, Ard an Ghleana 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."***

## **Bord Pleanála Case reference: JP04.320648**

The current location for the proposed St. Joseph's Road, Ard an Ghleana 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**

### **Galway city mayor criticises An Bord Pleanála housing decisions**

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**."

## **Good Planning Principle**

**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 overall submission to An Bord Pleanála with regard to Cork County Council's Section 177AE application to An Bord Pleanála for the proposed LRD, Ard an Ghleana on St. Joseph's Road, Mallow, Co. Cork.

**Martin Hanley & Associates Ltd., Reports for Cork County Council**

**Local Residents' Concerns with regard to key extracts from all reports as prepared by Martin Hanley & Associates Ltd., for Cork County Councils Section 177 AE Application to an Bord Pleanála for a proposed LRD Ard an Ghleana, on St. Joseph's Road, Mallow, Co. Cork.**

**Residential Travel Plan Extracts**

**Extract 1**

Baseline trips data indicates that a significant majority of trips (77.47%) originating in Mallow Electoral Area of Cork County are by private transport and are mainly car-based. Walking accounts for a significant proportion of journeys at 9.57% while cycling comprises 0.71% of trips. Approximately 0.78% of trips are taken by public transport. See Table 4.1 below is an extract from Cork County Council Development Plan 2022-2028 Chapter 12 Transport and Mobility. The targets for modal share for 2028 are also set out in the Development Plan and are shown in Table 4.1 below.

Commuting to or within	% Traveling to work by private Car	% Traveling to work by walking	% Traveling to work by cycling	% Traveling to work by public transport
Mallow Baseline	77.47	9.57	0.71	0.78
Mallow Targets 2028	60.0	14.0	4.0	11.0

Table 4.1: Cork County Development Plan – Mallow existing baseline mode share for commuting compared to target mode for commuting.

The Mallow Electoral area is primarily flat with the exception of Kennel Hill, St. Joseph's Road and O'Brien Street. With regard to St. Joseph's Road, one could assert with confidence that 0.05% of trips in our area are by walking and 0.001% of trips are by bicycle, whilst 99.949% of trips are by private transport or taxi. The overriding reason for this statistical reality is that St. Joseph's Road topography and gradient is a challenge for the average walker and an impossibility for the average cyclist.

Note map 1 and table 1 below.



**Map 1 - Benchmark Points - Location and Spot Colours**

## Bord Pleanála Case reference: JP04.320648

Benchmark - Colour Point on Map	Location	Bench Mark Value	Rise	Gradient from Base
Yellow	Start (Bottom) of St. Joseph's Road	52m (Base)		
Red	Castle Grove Entrance	69m	17m (From Base)	Practically level throughout
Orange	Castle Grove Rear abutting proposed Ard an Ghleana site.	78m	9m	
Light Blue	Crest of Hill on St. Joseph's Road	89m	37m (From Base)	1:17 or 0.057%
White	Aldworth Heights Entrance	87m	15m (From site rear)	0 or 0%
White	Aldworth Heights boundary line abutting proposed Ard an Ghleana site.	87m	15m (From site rear)	0 or 0%
Dark Blue	LHS Rear - proposed Ard an Ghleana site	70m	17m to Aldworth Heights Boundary	1:23.5 or 0.042%
Green	RHS Rear - proposed Ard an Ghleana site	75m	12m rise to Aldworth Heights Boundary	1:29.1 or 0.034%

**Table 1 - Corresponding Gradient Data to Benchmark Points**

To expect residents in the proposed Ard an Ghleana development to walk or cycle from home to Mallow Town for shopping, essential services, etc., through Aldworth Heights and down the steep hill on St. Joseph's Road, and face the return journey back up the steep hill on St. Joseph's Road is a totally unrealistic expectation.

As already stated in our overall submission St. Joseph's Road, with its existing high volume of traffic and rat run way, is a very dangerous road for pedestrians and cyclists, with a gradient that is a big challenge to the average walker and an impossible climb for the average cyclist.

## Extract 2

### 8.0 PEDESTRIAN FACILITIES

Pedestrian facilities from the proposed development are available along St Joseph's Road. A survey of the pedestrian routes available with suggested improvements are shown on drawing SJ-PR-P01 & SJ-PR-P02 in the appendix of the report.

In general footpath facilities along St Joseph's Road vary in width from 1.4m to 3.0m.

An alternative route for pedestrians may also be available through the existing Castle Grove housing development. Although a connection this pedestrian route will be subject to negotiation and planning approval.

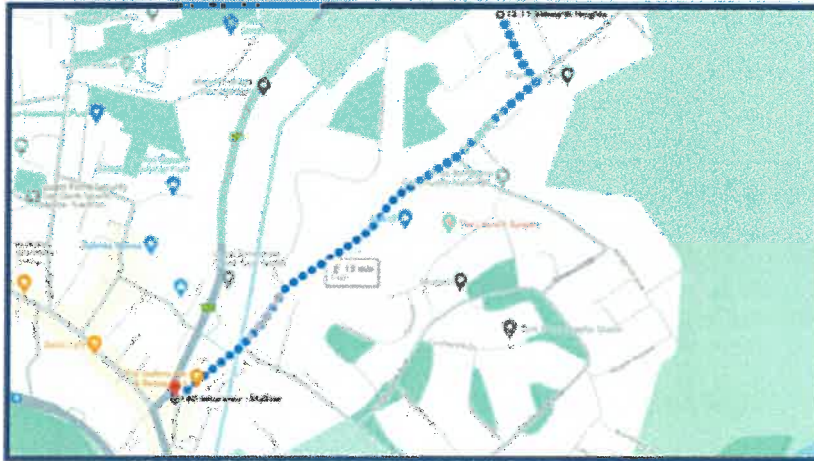


Figure 8.1 Route from proposed development along St Joseph's Road to Town Centre 13mins walking distance.



Figure 8.2 Route from proposed development through Castle Grove to Town Centre 12mins walking distance.

In the interest of residents, (adults and children), of the proposed Ard an Ghleana development, Cork County Council's second option, (see fig. 8.2 above), for an alternative pedestrian and cyclist route through Castle Grove, which Cork County Council is an option, (subject to negotiation and planning), is a shorter, safer and near level route to Mallow Town Centre. Route one could lead to road traffic accidents, for pedestrians and cyclists, in the short term given the volumes of local traffic and the continuous rat run traffic on St. Joseph's Road.





**Map - Showing pedestrian and cyclist route options - as included in Cork County Council's Application**

**Legend:-**

**Yellow - Option A (St. Joseph's Road)**

**Blue - Option B (via Castle Grove)**

**Orange - Option C (via Blackwater River Walkway)**

**Option A** - is very dangerous for pedestrians and highly dangerous for cyclists with a steep ascent from Mallow Town to Ard an Ghleana proposed development location.

**Option B** - Cork County Council has identified this alternative route in this application which appears to be a safer route for pedestrians and cyclists bypassing the major steep ascent on St. Joseph's Road.

**Option C** - By far a longer walk and cycle to Mallow town, with again very steep descents/ascent on two stages of the journey out and back. On a side note the land near the Blackwater river in option C is actually a flood zone area all along the riverside walkway, to alleviate flood defences of Mallow Town.



### Extract 3

#### 6.0 EXISTING SERVICES

The proposed Development has a number of existing services including, Scoil Aonghusa Community School, a Doctors Surgery, and local businesses in close proximity to the proposed development. See Fig 6.1 below.

Mallow Town centre located approx. 1km from the proposed Development provides a significant number of additional shops businesses, restaurants, and facilities all in close proximity to the proposed development.

Fig 6.1 below shows the main services with 15minutes walk of the proposed development site. The site is located within 13mins walk of Mallow Town centre.

- Mallow Community National School – 6mins walk.
- The Laurels Surgery - 8min walk.
- Promara Ltd - 3min walk.
- Mallow Rugby Club – 9min walk.
- BHIOS Prints – 7min walk.
- Mallow Castle Playground – 13min walk.
- Auroca Store – 12min walk.
- Dunnes Stores – 17min walk.

The above listing of existing services is, to say the least, misleading.

- The national school as listed is a multi denominational primary school, currently with an enrolment number of 210 pupils and is at near or full capacity, at present. Thus yearly intake is confined to school starting age levels
- This GP practice was the only one in the immediate area and closed down circa two years ago.
- Promara Ltd., is a private business, in Marine Surveying. How this service will support residents of the proposed Ard an Ghleana development, is a question for Cork County Council.
- BHIOS Prints is a photographic printing and framing business. How this service will support residents of the proposed Ard an Ghleana development, is a question for Cork County Council.
- The walk from the proposed estate to Dunnes Stores will take the average walker 20 to 25 mins down and 35 mins back, given the steep gradient of St. Joseph's Road, as stated previously, and indeed O'Brien Street and Muddy Hill are also steep hills, within the town centre. Walking home with a family shopping load, will probably take one hour at least, (weather permitting).

### Extract 4

#### 7.0 PUBLIC TRANSPORT FACILITIES

As part of the preparation of the Travel Plan, an assessment of the existing public transport infrastructure in the area was undertaken. A number of bus routes to both Cork and Charleville are available from Mallow Town Centre. The following existing bus services are available.

- Bus Éireann Route 243, Cork - Mallow - Kanturk - Charleville.
- TFI Local Link Cork Route 522 Charleville to Mallow.
- Expressway Timetable Route 51, Galway - Limerick – Cork service Mallow Town Centre.

## Bord Pleanála Case reference: JP04.320648

The nearest bus stop is located on Park road which is accessible from the proposed development in 21mins by walking and 8mins by bicycle.

Mallow is also served by a Cork / Dublin mainline train service. The station is located 2.7km from the proposed development. This can be accessed by car in 7mins by cycle in 10min or by walking in 33mins. Fig 7.3 below shows Mallow Train Station connectivity map highlighting the onward connections to Cork, Limerick, Tralee Waterford, and Dublin.

The stated times for walking are questionable and in our estimation should read 30 mins to the bus stop and 40 mins to the railway station. (Weather permitting). Return journeys will be 25% longer given the steep ascent up St. Joseph's Road. Walking with young children will add a further 30% to both out and return walks to the bus stop and railway station.

No doubt the proposed location for Ard an Ghleana LRD will lead to a big outlay on Taxis for Residents' families with no cars. Another big financial strain on discretionary income for families.

### Extract 5

#### 9.9 CYCLE FACILITIES

While cycle facilities are limited within Mallow town centre there is a network of footpaths and cycle tracks from the spa walk through the Castle Grounds and along the Blackwater River as shown in Fig 9.1 below. The proposed development will include a 3.0m wide two-way cycle lane within the development.

The shortest route for cyclist and pedestrians to the spa walk through the Castle Grounds and along the Blackwater River is through Kingsfort along Riverbank Walk. This is approx. 900 away from the proposed development and would take 2mins by bicycle.

There are no cycling facilities in Mallow Town Centre and as stated previously St. Joseph's Road is an extremely dangerous road for both cyclists and pedestrians. Providing a 3m wide cycle way within the estate will not be an incentive to cycle and is isolated at the very bottom of the estate and not extended anywhere else in the area. The Blackwater river walk will be the longest walk to the town centre, approximately 3 km, from the proposed Ard an Ghleana LRD to Mallow Town Centre, and will not be an incentive for pedestrians or cyclists. There is also no defined cycle way anywhere along the Blackwater river walk, which is primarily a pedestrian walk. And again there is a steep hill out of Castle Park, onto St. Joseph's Road - a further disincentive for pedestrians and cyclists.

Extract 6

10.2 Bicycle Parking

Cork County Council Development Plan 2022 gives guidance on cycle parking standards for new developments. Table 12.8 of the Plan sets the cycle space allocation for various types of development including residential developments. Table 10.2 below shows a schedule of required bicycle parking as set out by this document.

Cork County Council Development Plan 2022-2028 - Cycle Parking Standards	Total Spaces Per Unit	Total Units	Min Cycle spaces required
Apartments			
1 per bedroom	1	106	106
1 visitor space per 2 units	0.5	86	32
Additional cycle parking for housing	1	28	28
Creche 300sqm 1 space per 5 Staff long Stay	0.2	10	2
Creche 300sqm 1 space per 10 children Visitor	0.1	42	4
<b>Total</b>			<b>172</b>

Table 10.2: Bicycle parking requirements

To provide 172 cycle cycle spaces in the proposed Ard an Ghleana LRD, is very ambitious and contradicts the consultant's report figure of 0.71 of 1% take up of cycling in the electoral area of Mallow. Note extract:-

Baseline trips data indicates that a significant majority of trips (77.47%) originating in Mallow Electoral Area of Cork County are by private transport and are mainly car-based. Walking accounts for a significant proportion of journeys at 9.57 % while cycling comprises 0.71% of trips. Approximately 0.78% of trips are taken by public transport. See Table 4.1 below is an extract from Cork County Council Development Plan 2022-2028 Chapter 12 Transport and Mobility. The targets for modal share for 2028 are also set out in the Development Plan and are shown in Table 4.1 below.

On this basis the take up on the 172 bicycle spaces will be 1 or 2.

Note previous inputs throughout this submission on lack of local infrastructure, road gradients, poor footpaths, dangerous roads, etc.

## Bord Pleanála Case reference: JP04.320648

### Extract 7

Cork County Council Development Plan 2022 gives guidance on car parking standards for new developments. Table 12.6 of the Plan sets the car space allocation for various types of development including residential developments. Table 9.1 below shows a schedule of car parking spaces as set out by the Cork County Development Plan. Table 10.1 below shows a schedule of car parking spaces as set out by the Development Plan.

Land Use Category	Cork County Council Development Plan 2022-2028 - Car Parking Standards	Total Spaces Per Unit	Total Units	Parking spaces required
<b>RESIDENTIAL</b>				
74 House	2 spaces per unit	2	74	148
66 Apartments	1.25 spaces per unit	1.25	66	83
Creche	1.0 spaces per 3 staff	0.333	10	3
Creche	1.0 spaces per 10 children	0.1	42	4
<b>Total</b>				<b>238</b>

Table 10.1: Car parking allocation as per the Cork County Council Development Plan

VEHICLE PARKING SPACES - HOUSING			
Unit Types	No. of Units	Parking x Units	Total Parking
4 bed semi-detached	4	2no. parking spaces per unit	8
3 bed semi-detached	14	2no. parking spaces per unit	28
3 bed end townhouse	20	2no. parking spaces per unit	40
2 bed end townhouse	7	1no. parking spaces per unit	7
2 bed mid townhouse	34	1no. parking spaces per unit	34
<b>TOTAL NUMBER OF PRIVATE PARKING SPACES</b>	<b>74</b>		<b>112</b>
<b>TOTAL NUMBER OF VISITOR PARKING SPACES</b>			<b>8</b>
<i>This equates to 1.58 spaces per house</i>			
VEHICLE PARKING SPACES - APARTMENTS			
Unit Types	No. of Units	Parking x Units	Total Parking
2 bed duplex	32	1no. parking spaces per unit	32
1 bed of apartment	32	0.7no. parking spaces per unit	22
<b>TOTAL NUMBER OF PRIVATE PARKING SPACES</b>	<b>64</b>		<b>55</b>
<b>TOTAL NUMBER OF VISITOR PARKING SPACES</b>			<b>3</b>
<i>This equates to 0.9 spaces per apartment</i>			
VEHICLE PARKING SPACES - CRECHE			
Unit Types	No. of Units	Parking x Units	Total Parking
42 Child Creche	1	1no. parking spaces per 3no. staff & 1no. parking spaces per 10no. children	3
<b>TOTAL NUMBER OF PARKING SPACES</b>	<b>1</b>		<b>8</b>
<b>TOTAL NUMBER OF CAR PARKING SPACES (ENTIRE SITE)</b>			<b>183</b>
NOTE: The total number of parking spaces can be reduced by 38no. if the 4 & 3 bed units are provided with 2no. parking spaces per unit.			

See our concerns on traffic congestion and associated dangers for pedestrians and cyclists in the overall submission.

The residents travel plan includes 164 car parking spaces - 112 for the houses and 55 for the one and two bedroom apartments, whilst also providing 172 bicycle spaces for both houses and apartments. Given the focus on cycling, albeit at the top of a steep hill outside of Mallow Town Centre, it seems contradictory to allocate 112 parking spaces for car parking spaces? Given the reality of the steep hill on St. Joseph's Road and the consultant's confirmation that less than 1% of the Mallow Electoral area actually cycle, 5 cycling spaces would be a more realistic allocation within the plan.

Residents submissions on impracticalities of cycling and walking are comprehensively covered in this submission.



## Extract 8

The proposed development is connected to the Town centre by a series of existing footpath and pedestrian crossing facilities. The proposed development is located in close proximity to existing schools, shopping facilities and local services all within walking distance.

This statement is a total misnomer and existing local residents can vouch for the fact that the statement and indeed this overall Residential Travel Plan is light touch on substance, fact and reality.

## Extract 9

### 11.0 OBJECTIVES OF THE TRAVEL PLAN

The objectives of the Travel Plan for the proposed development are as follows:

#### **Objective 1**

To promote and increase the use of public transport, walking and cycling for residents, and visitors, and to facilitate travel by walking, cycling, and Bus.

The encouragement and increased use of other modes of transport, which are less damaging to the environment in terms of congestion and emissions, are directly linked to operating a lower-car-use development. Apart from the environmental benefits, the use of more sustainable modes of transport provide the following benefits to the individual:

- Savings in personal costs. Walking is free, cycling does not incur any fuel costs and buying a bicycle or using public transport is cheaper and can benefit from Government tax incentives.
- Health benefits. Levels of fitness and wellbeing increase with the practice of exercise, which is directly related to walking and cycling. The use of public transport avoids the stress of driving, traffic congestion, seeking parking spaces, etc.

#### **Objective 2**

To integrate travel plans into the development decisions, policies, and practices and to work closely with governing bodies on matters of access and transport services around the vicinity of the development site.

Travel Plans and sustainable transport cannot be addressed in isolation, but as part of a more general approach towards the development of a sustainable organisation whose functions deliver significant benefits to the community and the environment, together with economic savings. Regular communication with the Local Authorities on further improving facilities in and around the vicinity of the development can establish good policies and practices when developing decisions, within the Travel Plan.

#### **Objective 3**

To provide information on sustainable modes of travel and to have resources readily available to increase awareness of these amongst development users.

The Travel Plan has a significant role to play in the provision of information and resources both to people within the development and to the wider community. Information should be made readily available, and the benefits of sustainable travel should be widely promoted throughout the development when completed.

**Objective 1** - Unachievable and risk to life and limb given the topographical realities of both the site location and St. Joseph's Road & Surrounds.

**Objective 2** - The site location and St. Joseph's Road & Surrounds have no access to public transport.

**Objective 3** - Sustainable modes of transport are not feasible given the topographical realities of both the site location and St. Joseph's Road & Surrounds. Walking and cycling are not feasible given the steep gradients of local roads and existing poor local roads infrastructure for all vehicle drivers, cyclists and pedestrians.



**Extract 10**

The targets set will require ongoing work and commitment from the development as a whole, without which they will not be achieved. It is recognised that some people will be easier to convert to alternative modes of transport than others. There are those who have no choice but to use the car (school runs prior to work etc.) however the more that is done to facilitate the use of alternative modes, the more they will be used. As it has already been noted, a Travel Plan is an ongoing process and targets that are achieved should be replaced by further targets.

The targets are not achievable, short, medium or long term, for all the reasons as given throughout this report. Indeed the site location and associated surrounding topographical realities will be a major disincentive for people to avail of the house or apartment. The proposed development Ard an Ghleana is too remote from essential services and Mallow Town centre, overtly dangerous for pedestrian and cyclist access/egress to essential services and Mallow Town Centre.

**Extract 11**



**13.2 Walking & Cycling**

The feasibility of measures that promote cycling and walking will be influenced by factors such as the safety and ease of cycling to and from the site. Generally speaking, a distance of up to 4 km is considered reasonable for walking, and up to 10 km for cycling. These distances are only indicative but can help to define target groups.

All pertinent safe walking and cycling routes should be identified within a radius of at least 5km around the residential development site.

The health benefits of these activities in particular should be promoted throughout the development.

The bicycle parking should be secure and sheltered. Maintaining a toolkit containing puncture repair equipment, pump, etc. for use in emergencies, should be made available to all bicycle users.

**13.3 Public Transport**

As stated previously walking and cycling are not feasible, not safe and a danger to life and limb to and from the proposed site.

Extract 12

**14.0 SUMMARY**

In conclusion, the proposed development is well located in Mallow for the implementation of the Travel Plan promoting alternative modes of transport. The proposed development has access to bus routes and is within walking & cycling distance of Mallow Town centre.

All sustainable modes of transport should be promoted in the Travel Plan. In particular, walking & cycling should be actively encouraged. This can be achieved via the circulation of useful information such as routes, exercise plans etc. Walking & cycling societies could be formed to create a community culture around the activity. Attention should also be drawn to the regular bus and rail routes. A bulletin board could be placed in the lobby of apartment blocks or other such communal areas where information on all alternative transport modes could be posted.

The recommended measures to be implemented as part of the Travel Plan are summarised as follows:

**General**

- Put in place a formal Travel Plan.
- Appoint a travel plan manager by Apartment Management Company.
- Create an access map.
- Provide a dedicated on-site travel information point.
- Provide travel information to residents, in the form of a sustainable travel information pack.
- Monitor the operation of the plan by residents and visitors, through travel surveys.
- Revise and update the plan as required.

**Walking and Cycling**

- Maintain and promote facilities for walkers and cyclists.

**Public Transport**

- Provide information on locations of stops, routes, timetables, walking/cycling times to main public transport facilities, etc.
- Provide tailored advice on multi-modal journeys to include public transport.

**Car Sharing**

- Provide information e.g., benefits of car sharing, annual cost savings, map of bases in locality, links to website etc.

The continued dependence on the motor car is not sustainable into the future. Planning and development of new commercial and residential schemes should go hand in hand with a transport strategy limiting the dependence on the private motor car. The proposed residential development in Mallow will aim to achieve these goals.

A Site Plan of the proposed development can be found in Appendix A.

The proposed development on St. Joseph's Road is not a feasible, practical or safe location for the implementation of the travel plan. Local Residents' alternative proposals as detailed in this submission will better compliment the travel plan and enable future residents of Ard an Ghleana to walk and cycle safely to essential services and Mallow Town Centre.

Indeed, future residents of the proposed development will be far closer to Mallow Town and essential services if local resident's proposals 2 or 3 are implemented.

**Road Safety Matters**



**Road Safety Audit  
Stage 1/2  
for  
ACCESS TO PROPOSED RESIDENTIAL DEVELOPMENT  
AT  
ARD AN GHLEANNA, MALLOW, Co CORK.**

**Date:** July 2024

**Report produced for:** Martin Hanley Traffic & Transportation

**Report produced by:** Road Safety Matters Ltd

**Reference:** RSM/MOB/150923/MALLOW RSA1-2

Road Safety Matters Ltd  
c/Kingford Rd, Johnstown  
Wickham, Ireland E11 W72  
Tel: +353 (0)56 8425  
[info@roadsafetymatters.net](mailto:info@roadsafetymatters.net)  
[www.roadsafetymatters.net](http://www.roadsafetymatters.net)

Company Registration No: 477942 (11 Nov 2014) 2014/2014/01

Local residents applaud this report with regard to the internal safety management of the proposed Ard an Ghleana LRD. Attention to detail and regard for motorists, pedestrians, cyclists, e-scooters and Visually Impaired is highly commendable. However scant research or survey has been done with regard to the exit from Aldworth Heights onto St. Joseph's Road and the current poor standards and specifications of St. Joseph's Road, a dangerous road for pedestrians and cyclists not to mind the Gridlock, near cul-de-sac at the town end of St. Joseph's Road. Local Residents issues and concerns are exhaustively detailed throughout this submission on these realities.

**A further reality has now also dawned on local residents, this report includes consideration of e-scooters within the estate. A corresponding result of e-scooters will further endanger local residents and pedestrians on St. Joseph's Road, (albeit very few due to the steep gradient of the road).**

Traffic and Transport Assessment

**Proposed Housing Development,  
Ard an Ghleanna, Mallow, Co Cork.**



**Traffic & Transport Assessment.**

*Martin Hanley Consulting Engineers Ltd.  
Traffic & Transportation,  
Consulting Engineers,*



**Extract 1**

Traffic counts were carried out by Traffinomics Ltd on the 09th of May 2023 for the morning peak hours of 07:30 - 09:30 and the evening peak hours of 16:30-18:30. Counts were undertaken at the major junctions accessing the proposed development included the following junctions,

- Junction 1 St Joseph's Road / N72 North
- Junction 2 St Joseph's Road / Aldworth Heights Housing Development
- Junction 3 St Joseph's Road / Kingsfort
- Junction 4 St Joseph's Road / Castlepark
- Junction 5 St Joseph's Road / N72 South
- Junction 6 N72 South / Davis Street
- Junction 7 Bridge Street N72 / Bridewell Lane
- Junction 8 Bridge Street / Park Road N72

This report takes no cognancy of all the proposed LRD's in the area, over the next three years and the associated resulting traffic flows, congestion and gridlock. Local residents have included traffic statistics in this overall submission, and the relevant table as included is recopied here:-

**Increased Traffic Volume Density Projection**

**Legend:**

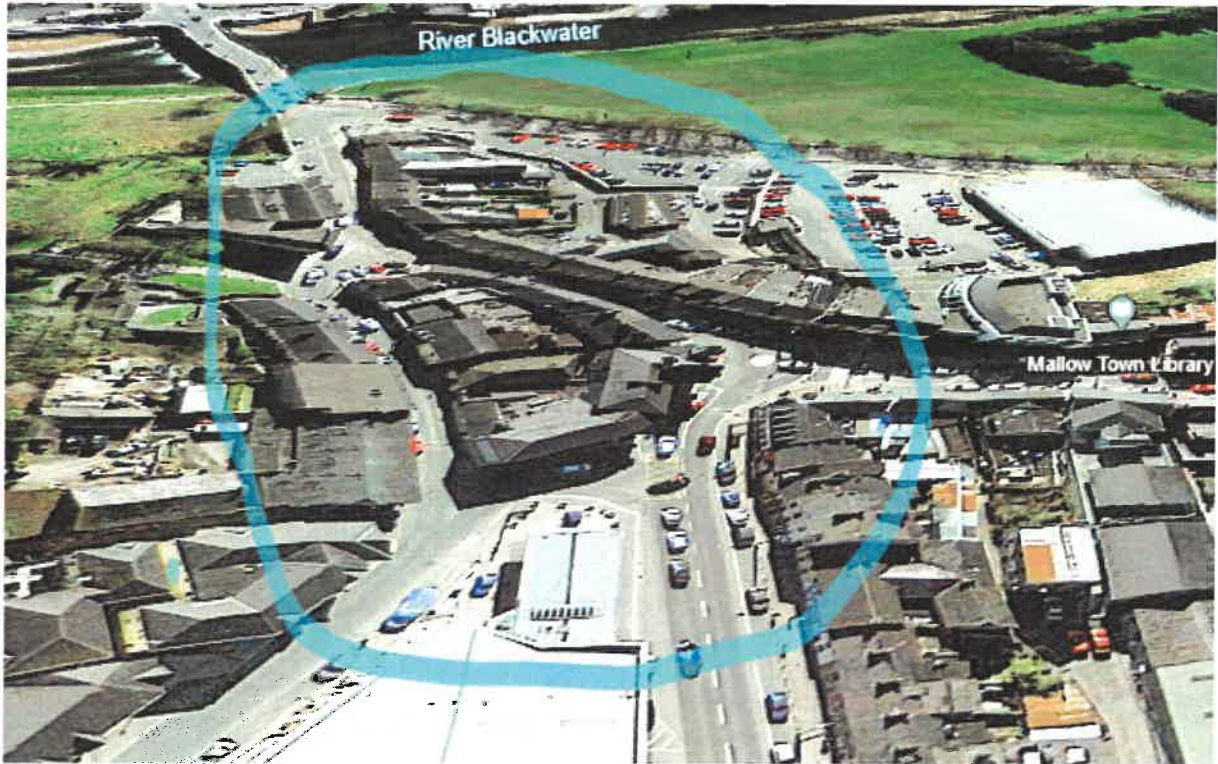
- SJR - St. Joseph's Road**
- SG = Spa Glen**
- HB - HazelBrook LRD**
- CP - Castle Park LRD**
- CCC - Cork County Council LRD**
- OFD - O'Flynn Developments LRD**

**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	
<b>Totals</b>	<b>1294</b>	<b>1940</b>	<b>2570</b>	<b>2553</b>	<b>227</b>	<b>2480</b>	<b>2480</b>





**Map - 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 Ard an Ghleana.
- 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.**

## Extract 2

### 8.3 Conclusions

The following are the main conclusions of the LinSig traffic analysis for the eight number junctions within the study area.

#### Junction 1 St Joseph's Road / N72 North

- The maximum degree of saturation of the junction in 2023 is 21.4% for the evening peak hour. This increases to 33.6% in the design year 2040. No changes are recommended to this junction although this junction will be upgraded as part of the Malrow Northern Relief Road Project.

#### Junction 2 St Joseph's Road / Aldworth Heights Housing Development

- The maximum degree of saturation of the junction in 2023 is only 3.9% for the morning peak hour for traffic exiting the Aldworth Height Housing Estate. This increases to 13.8% saturation in the design year 2040.
- The junction with St Joseph's Road will be upgraded to provide adequate junction sight distance and improved footpath and pedestrian crossing facilities as a part of separate permission granted under a Part 8 application by Cork County Council .
- Junction sight distance of 49m to the east and west will be provided at 2.4m back from the road edge measured for design speed of 50km/hr in accordance with DMURS. The junction will be an uncontrolled STOP junction with appropriate road marking and signage provided.

#### Junction 3 St Joseph's Road / Kingsfort

- The maximum degree of saturation of the junction in 2023 is 20.8% for the morning peak hour for traffic exiting Kingsfort housing development. This increases to 35.2% in the design year 2040.
- The kerb radii could be reduced and dropped kerbs and tactile paving provided to improve pedestrian facility at the junction.

#### Junction 4 St Joseph's Road / Castlepark

- The maximum degree of saturation of the junction in 2023 is 25.3% for the morning peak hour for traffic exiting Castlepark housing development. This increases to 41.2% in the design year 2040 for the morning peak hour.
- The kerb radii could be provided and dropped kerbs and tactile paving provided to improve pedestrian facility at the junction.

#### Junction 5 St Joseph's Road / N72 South

- The maximum degree of saturation of the junction in 2023 is 32.6% for the morning peak hour for traffic heading northbound on the N72. This increases to 45.6 % in the design year 2040 for traffic on St Joseph's Road heading towards the N72 the morning peak hour.
- Dropped kerbs and tactile paving could be provided to improve pedestrian facility at the junction.

#### Junction 6 N72 South / Main Street

- The maximum degree of saturation of the junction in 2023 is 65.1 % for the evening peak hour for traffic on Main Street at this signalised junction. This increases to 82.6 % in the design year 2040 for traffic on Main Street for the evening peak hour.
- No improvements to this junction are recommended.

## Bord Pleanála Case reference: JP04.320648

### Junction 7 Bridge Street N72 / Bridewell Lane

- The maximum degree of saturation of the junction in 2023 is 43.5 % for the morning peak hour for traffic on Bridewell lane at this uncontrolled junction. This increases to 78.7 % in the design year 2040 for traffic on Main Street for the morning peak hour.
- The kerb radii could be reduced and dropped kerbs and tactile paving provided to improve pedestrian facility at the junction.

### Junction 8 Bridge Street / Park Road N72

- The maximum degree of saturation of the junction in 2023 is 70.1 % for the morning peak hour for traffic on N72 Bridge Street heading south at this signalised junction. This increases to over 100% saturation by the design year 2040 if changes to the traffic signals staging are not undertaken.
- The current junction arrangement shows straight through and right turn traffic from Bridge Street travelling south on different signal phases. Site observation indicates that any HGV waiting to turn right blocks the straight through traffic. Also, any significant right turn traffic volumes can again block the straight through traffic as the right turn lane is too short at approx. 15.0m. A car waiting to turn right will also block a HGV travelling south.
- The recommended change to the junction would be to operate the right turn and straight through traffic from Bridge Street on a single traffic signal phase with both lanes moving together. This will reduce the saturated flow from over 100% to 84.3% for traffic on Bridge Street heading south in the design year 2040.

- This report takes no cognacy of all the proposed LRD's in the area, over the next three years and the associated resulting traffic flows, congestion and gridlock.
- 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 Ard an Ghleana.
- 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.**

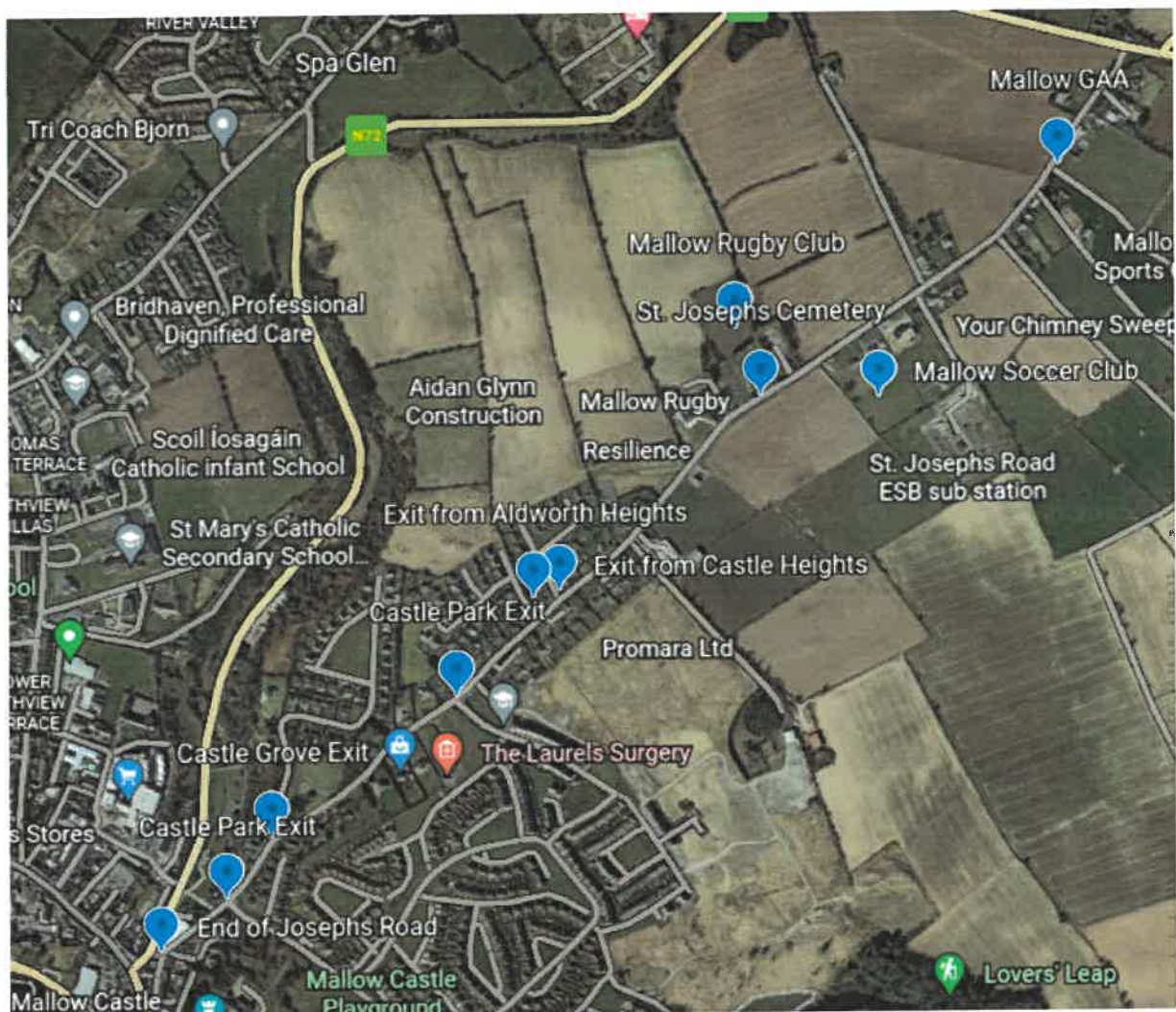


## **St. Joseph's Road Concerns**

St. Joseph's Road and Aldworth Heights Residents have very strong concerns regarding the current standard of St. Joseph's Road and its existing vehicular traffic density.

St. Joseph's Road and Aldworth Heights Residents Residents feel that St. Joseph's Road has reached its peak capacity and is not suitable for further high density housing developments and its associated increase in traffic volumes.

On top of that St. Joseph's road is identified as a continuous "rat run" for non-local private and commercial traffic.



- Google Earth Shot shows aerial view of St. Joseph's Road and existing volumes of housing densities which includes Castle Park, Castle Grove, Aldworth Heights, Castle Heights and road frontage detached dwellings. Blue markers indicate feeder exits from estates, and the near cul-de-sac end to St. Joseph's Road, on the town side.

## Bord Pleanála Case reference: JP04.320648

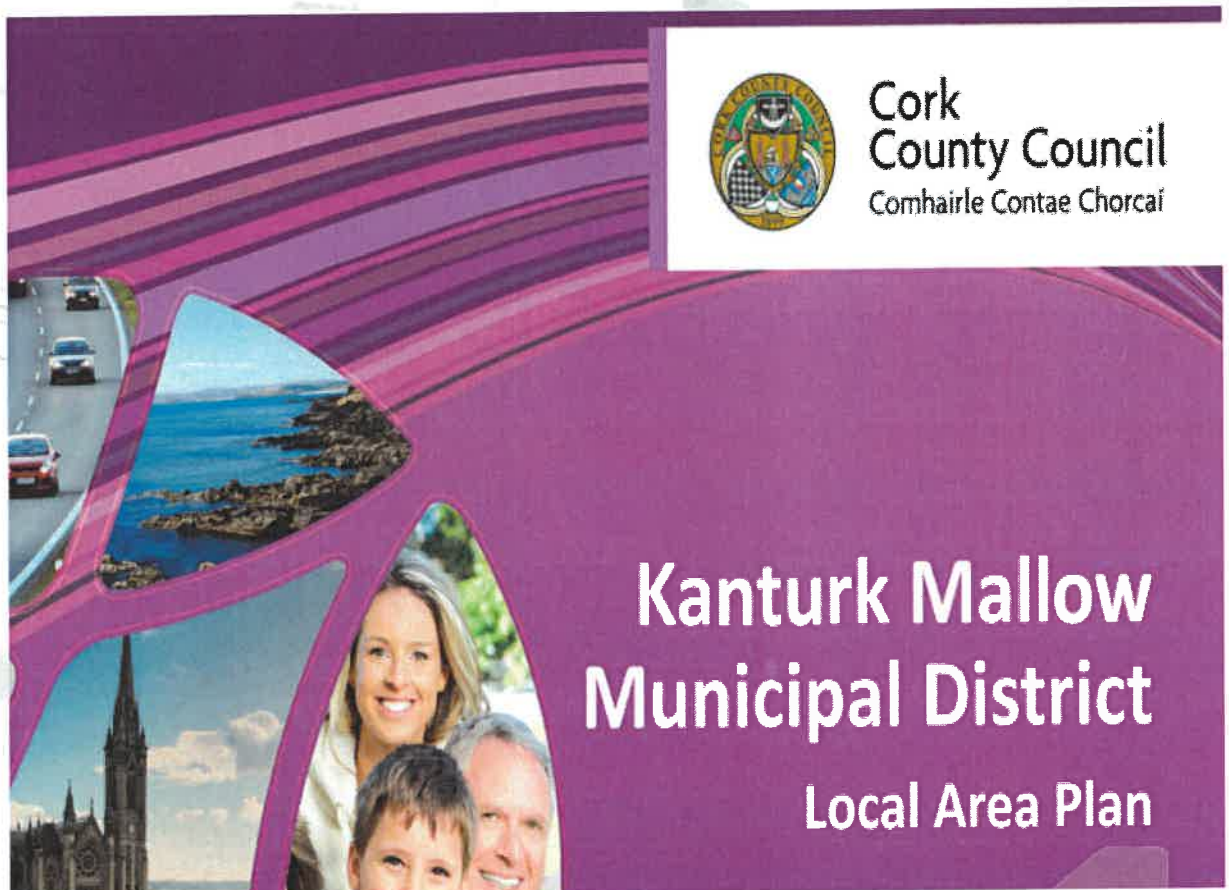
- Google Earth Shot also has blue marker indicators for the local Cemetery, Rugby, Soccer and GAA Clubs. Indeed the next stage of development in Castlepark is planned for the northern section of the land comprising approx. 19.29 hectares (47.68 acres) is zoned residential. It has potential for residential development and a continuation of the Castlepark residential scheme subject to planning permission. An indicative development layout prepared by O'Keeffe O'Connell Architects indicates potential for upwards of 450 houses to include a mix of 3 bed semi-detached, 4 bed semi-detached, 4 bed detached and 4 bed town houses. (Source: <https://lisney.com/property/land-at-castlepark-mallow-co-cork/> )
- A further proposed LRD of upwards of 400 houses by another developer will connect with Cork County Council's proposed LRD Ard an Ghleana, further stifling and strangling St. Joseph's Road, leading to absolute gridlock.
- This clearly indicates that current traffic volumes are above capacity for St. Joseph's Road, and this capacity is at breaking point with the additional vehicular traffic using the road travelling to and from Fermoy/Mitchelstown and beyond. Such vehicular traffic includes Light Weight/HGV/Articulated traffic. Further traffic congestion is dominant with funerals and when GAA, soccer and rugby matches are played at the three club venues on the eastern end of St. Joseph's Road. Future proposed LRD developments will also add further and unmanageable vehicular capacity to St. Joseph's Road.
- The town end of St. Joseph's Road runs into a near cul-de-sac of a narrow laneway road for traffic heading to the bridge and a T-Junction for traffic heading to the town centre. This results in high traffic congestion at peak and off peak times.
- 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, unsafe for pedestrian use, lacks proper street lighting, and is not suitable for additional road traffic which would result from further housing development on the road.
- St. Joseph's Road's steep gradient is a challenge to pedestrians and an impossibility for cyclists. Indeed very few people walk St. Joseph's Road and it's an extremely rare event to see a cyclist on the road, either direction.
- 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 cyclists and pedestrians. The road also requires proper street lighting. 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 Ard an Ghleana.



## **Bord Pleanála Case reference: JP04.320648**

- The road is so dangerous that Cork County Council had to put in speed reduction ramps in the two years to reduce rat run traffic speeds. This has helped, but only marginally. Should LRD's be granted permission anywhere on the current St. Joseph's Road, serious injury and loss of life, pedestrian and cyclist will be the result, short, medium and long term.
- **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.**

### **Key Extracts of Relevance and Local Residents of St. Joseph's Road Comments on the Kanturk Mallow Municipal District LAP 2017 and the Cork County Development Plan 2022 - North Cork**



**Extract 1**

3.2.8 Within Mallow provision has been made for a residential land supply of 339.93 ha, with the capacity to provide approximately 6,961 units. It is estimated that approximately 600 of these units can be provided on zoned lands which are located within the former town council boundary and currently within the Mallow Town Development Plan 2010. In addition to these greenfield lands it is envisaged that there is also scope to provide new housing within the town centre and through infill / redevelopment opportunities within the existing built up area. Such developments are important in terms of supporting the vitality of the town centre area. This Plan makes provision for the balance of the growth to be accommodated within the environs of the town. The plan also makes provision for a range of houses types. It is important new development enhances the overall environment of the town and supports the development of a sustainable community. The strategy seeks to ensure that most new housing is provided within a 20 minute walking distance of the town centre or a planned neighbourhood centre, and close to employment developments to reduce dependency on private car transport. In this context development proposals need to be designed to achieve good connectivity with the rest of the town and existing social and community services.

**Local Residents Response:-**

- Infill/redevelopment opportunities within the existing built up area, to support the vitality of the town centre have not been done to date by Cork County Council. The proposed LRD Ard an Ghleana on St. Joseph's Road will not enhance the overall development of the town, nor will it support the development of a sustainable community, and its location is now within a 20 mins., walk of supermarkets, secondary schools, GP's, Dentists and other essential services. The proposed location does not achieve good connectivity with the rest of the town and existing social and community services.
- One and two bedroom apartments should be built on existing infill/development opportunities within the existing built up area to support the vitality of the town centre, and should not be built in peripheral site locations removed from the town centre.

## Extract 2

### Infrastructure

#### Roads and Public Transport

3.2.46 Strategically, Mallow is well positioned on the N20 approximately 30km north of Cork City and 60km south of Limerick City. It is also located on the N72 which connects to Killarney and Fermoy, and onwards to the M8 serving Dublin. Mallow is also served by the Cork-Dublin intercity train service and also has services to Tralee / Killarney. Public bus services provided by Bus Eireann serve Mallow whilst there is no internal bus service within the town itself.

3.2.47 The Mallow Traffic and Transportation Study prepared for the town in 2011 recommended the construction of several new roads to the north, east and west of the town, and new river crossings to the east and west, to connect new development areas to the N20, N72 and proposed M20 and to enhance accessibility within the town itself, as well as upgrading existing roads and junctions. The recommendations also assumed the delivery of the M20 which is presently suspended. The study would need to be updated to take account of the requirements of Environmental, Flood Risk and Habitats Directive Assessment.

3.2.48 The N20 and the N72 national routes traverse and bisect the town causing congestion which adversely impacts on the amenity of the town, the capacity of the local 'internal' road network and the convenience and accessibility of local trips within the town to access shops and services. Although presently on hold, the route corridor for the M20 continues to be protected to the east of the town in the County Development Plan. In the short-term the provision of a Northern Relief Road is critical to take N72 traffic away from the centre of Mallow and has been acknowledged in the Government's Infrastructure and Capital Investment Plan 2016-2021 as due to commence subject to planning.

3.2.49 In terms of the wider built up area, general accessibility and connectivity for pedestrians and cyclists needs to be improved between residential areas and the town centre, transport services,

21<sup>st</sup> August 2017

49

Mallow Municipal District Local Area Plan

employment areas, schools and other services to enhance opportunities, and provide convenient routes for walking and cycling on local journeys. Access from the town centre to lands south of the River is limited to the Bridge at Bridge Street. Further pedestrian bridging points across the River need to be delivered to provide more direct links to the centre within a more attractive walking and cycling environment.

3.2.50 As the town continues to develop and grow in line with population targets, there will be a need for the upgrading/provision of new road and transport infrastructure to serve both new and existing areas of the town. Any revised traffic and transportation plan must give detailed consideration to such infrastructural needs particular to the north east and north west of the town. As the population grows consideration should also be given to the provision of a public bus service within the town and the design and layout of new development should consider the requirements of such a service.



## Bord Pleanála Case reference: JP04.320648

3.2.51 In summary, some of the key issues for Mallow in terms of traffic and transportation which need to be addressed include:

- Delivery of Mallow Northern Relief Road and the M20 to relieve the town of through traffic, and free up capacity in the existing road network.
- Tackling severance and enhancing overall connectivity within the town particularly north-south across the River Blackwater and east-west across the N20. (Improving north/south connectivity would require additional pedestrian / vehicular bridging points over the Blackwater. East-West connectivity could be enhanced through improvements to the Annabella Junction, improvements to the crossing of the Cork-Dublin rail line and delivery of the M20.)
- Need for new road infrastructure and upgrading of existing infrastructure to serve existing and new residential areas (particularly to the north east and north west of the town).
- Retrofitting pedestrian and cycle facilities to enhance accessibility between the different parts of the town.
- Making provision for the longer term transport needs of the town including a town bus service.

### Local Residents Comments:-

- 3.2.48, 3.2.49, 3.2.50 and 3.2.52 clearly concurs with local residents of St. Joseph's issues, concerns, observations and proposals as included throughout this submission to An Bord Pleanála.

### Roads Infrastructure

3.2.84 The key route connecting these lands to Mallow Town Centre is St. Joseph's Road (L1220). The N72 (Mallow – Fermoy Road) also borders the site and can be accessed from St Joseph's road at Oliver's Cross. From the N72 access to other parts of town is available via the Spa Springs Road (L1246-0).

3.2.85 The Mallow Traffic and Transportation Study, prepared for the town in 2011, assumed the delivery of the M20 but this is presently suspended. In addition to the M20, the study suggested the

construction of a number of new roads were needed to serve the future development of this expansion area including a Carrigoon Beg distributor road connecting the N72 southwards crossing St Joseph's Road and the Blackwater to the Ballymagooley / Killavullen Road. An eastern distributor road was then proposed running south from the Ballymagooley Road, to join the N20 at a new junction at Quartertown Lower. These suggestions need further consideration and assessment in the context of Environmental, Flood Risk and Habitats Directive Assessment, the current status of the M20 and renewed proposals in relation to the provision of a Northern Relief Road. The Council will explore using the National Transport Authority's multi-modal South West Regional Model (SWRM) to further inform the development of the transportation strategy for the Mallow Urban Expansion Areas over the lifetime of the Local Area Plan.

3.2.86 It is not feasible for the volume of traffic associated with the development of this area to be routed down St Joseph's Road and through the town centre. Delivery of a Mallow Northern Relief Road, along the line of the former Mallow-Fermoy rail line, or some other route, is essential to divert the N72 route away from the town centre and free up road capacity to cater for the development of this expansion area. Provision of a Northern Relief Road will provide alternative access to the N20 around the northern edge of the town and allow the current N72 to be re-classified as a non national road, thus allowing for access to the lands from the current N72 road.

## **Bord Pleanála Case reference: JP04.320648**

- 3.2.87 Significant development of these lands is premature pending the development of a Northern Relief Road. Delivery of this route is a matter for Transport Infrastructure Ireland and is beyond the control of the Council.
- 3.2.88 St. Joseph's Road is a key central road within the site. Significant upgrading will be required to this piece of roads infrastructure particularly as much of the key community services and attractions are likely to be concentrated in this central area. Additional upgrading of the pedestrian and cycle facilities on both this road and the N72 route will also be needed once the N72 is diverted and the road is reclassified.
- 3.2.89 Delivery of the M20 is important to the overall development of Mallow. Delivery of the M20 would also allow the current N20 route to be reclassified and would free up additional road capacity within the town which would then be able to cater for new development.

### **Local Residents' Response:-**

- 3.2.84 through to 3.2.89 clearly state in detail what local residents see as current, critical realities regarding St. Joseph's Road and surrounds. 3.2.84 through to 3.2.89 conclude what local residents have included in this overall submission to An. Bord Pleanála. Current roads' poor infrastructure needs to be totally upgraded and the Mallow Relief Road needs to be built, before any further LRD's on St. Joseph's Road.

# **VOLUME THREE NORTH CORK**

# **3**

## **CORK COUNTY DEVELOPMENT PLAN 2022**

**Key Extracts for the Cork County Development Plan 2022 - North Cork  
complimenting the Kanturk - Mallow Municipal Area LAP 2017:-**



**Extract 1**

**Regeneration Areas**

2.4.20 Mallow's identification as a Key Town in the Regional Spatial and Economic Strategy for the Southern Region advocates for town centre-led regeneration. This plan identifies areas which are either zoned as town centre or are within the built up area of the town but need to be highlighted in the event that the opportunity to redevelop them emerges during the lifetime of the plan.

Table 3.2.5 Regeneration Sites in Mallow	
Regeneration Area	Number and Description

**Local Residents Comments:-**

- Little or no progress has been achieved with regeneration sites within Mallow Town Centre. One and two bedroom apartments should be built on existing infill/development opportunities within the existing built up area to support the vitality of the town centre, and should not be built in peripheral site locations removed from the town centre.
- Please refer to the list as detailed on Table 3.2.5 regeneration sites in Mallow - Cork County Development Plan 2022

**Extract 2**

**Movement**

- 2.4.80 Strategically, Mallow is well positioned on the N20 (Atlantic Economic Corridor) approximately 30km north of Cork City and 60km south of Limerick City. It is also located on the N72 which connects to Killarney and Fermoy, and onwards to the M8 serving Dublin. Mallow is served by the Cork-Dublin intercity train service and also has services to Tralee / Killarney. The RSES recognises Mallow's strategic location and accessibility on inter-regional rail networks. It seeks to strengthen investment in infrastructure and services between Mallow and other locations to help support modal shift in North Cork. This aim is also supported in this plan. Public bus services provided by Bus Eireann serve Mallow whilst there is no internal bus service within the town itself.
- 2.4.81 The Mallow Traffic and Transportation Study prepared for the town in 2011 recommended the construction of several new roads to the north, east and west of the town, and new river crossings to the east and west, to connect new development areas to the N20, N72 and proposed N/M20 and to enhance accessibility within the town itself, as well as upgrading existing roads and junctions. Its recommendations also assumed the delivery of the N/M20 to the east of the town. The study needs to be updated and revised to take account of the requirements of Environmental, Flood Risk and

## Bord Pleanála Case reference: JP04.320648

Habitats Directive Assessment as well as the current context for Mallow set within the National Planning Framework and RSES. It is a requirement of the RSES that based on its designation as a Key Town a Local Transport Plan is prepared and this should be prioritised over the lifetime of the plan.

- 2.4.82 The N20 and the N72 national routes traverse and bisect the town causing congestion which adversely impacts on the amenity of the town, the capacity of the local 'internal' road network and the convenience and accessibility of local trips within the town to access shops and services. In the short-term the provision of a Relief Road is critical to take N72 traffic away from the centre of Mallow and continues to be a priority in the Government's Infrastructure and Capital Investment Plan 2016-2021 (due to commence subject to planning). A corridor for the planned N72/N73 Mallow Relief Road has been selected to the north of the town and is included as objective MW-U-01 while an Active Travel Corridor is also included as objective MW-U-04. An option selection exercise for the N/M20 motorway is also continuing in parallel.
- 2.4.83 In terms of the wider built up area, general accessibility and connectivity for pedestrians and cyclists needs to be improved between residential areas and the town centre, transport services, employment areas, schools and other services to enhance opportunities, and provide convenient routes for walking and cycling on local journeys. Ongoing enhancement of the town centre to make it more people focused and permeable is needed. The previous Traffic and Transportation Study proposed a Cycle Friendly Zone in the town centre while the potential for new pedestrian amenity routes along the banks of the river Blackwater should also continue to be explored.
- 2.4.84 Access from the town centre to lands south of the River is limited to the Bridge at Bridge Street which will benefit from the addition of a boardwalk on the western side. Further pedestrian bridging points across the River would be of benefit and provide more direct links to the centre within a more attractive walking and cycling environment. The previous town plan as well as the Transportation Study made provision for a central cross river connection to Park Road and this should be considered as part of any future transport plans for Mallow.
- 2.4.85 As the town continues to develop and grow in line with population targets, there will be a need for the upgrading/provision of new road and transport infrastructure to serve both new and existing areas of the town. Any revised traffic and transportation plan must give detailed consideration to such infrastructural needs. As the population grows, consideration should also be given to the provision of a public bus service within the town and the design and layout of new development should consider the requirements of such a service.
- 2.4.86 The National Transport Authority has recently approved funding for a range of projects through Project Ireland 2040 within the town. This includes interventions to enhance the Active Travel Network and the overall pedestrian and user experience by improving accessibility to key locations within the town such as the train station, the bus stop (public transport hub), the town centre/park as well as within and between local communities.

### Local Residents Comments:-

- 2.4.80 through to 2.4.86 of the Cork County Development Plan 2022 - North Cork compliments the Kanturk - Mallow Municipal Area LAP 2017 which clearly concurs with local residents of St. Joseph's issues, concerns, observations and proposals as included throughout this submission to An Bord Pleanála and clearly state in detail what local residents see as current, critical realities regarding St. Joseph's Road and surrounds and what local residents have included in this overall submission to An Bord Pleanála. Current roads' poor infrastructure needs to be totally upgraded and the Mallow Relief Road needs to be built, before any further LRD's on St. Joseph's Road.
- **St. Joseph's Road and all surrounding estates and frontage housing are exactly the same as what they were in 2017 when the Kanturk Mallow Municipal District LAP 2017 was published.**

## **Local resident's proposals for balanced, integrated and effective planning**

### **Overview**

### **Integrated Planning and Joined up Thinking**



**Map 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 - Private Developer (900 units)**

All of the areas shown are zoned for current and future housing LRD - over the next 5 to 7 years. (2025 to 2032).

Local residents on St. Joseph's Road feel very strongly that to achieve a good and balanced planning outcome, Cork County Council's proposed LRD at Ard an Ghleana, St. Joseph's Road, should be designed to integrate with O'Flynn Developments Spa Glen 2 development and, in turn the orange boundary development can subsequently link with O'Flynn Developments.

Local residents assume that the future private developments will include community amenities, shops, creches, etc.

**Note** - Castle Park Development of 450 units is not included in the above map and descriptive.



## Bord Pleanála Case reference: JP04.320648

Cork County Council's proposed development of 74 houses and 64 apartments at Ard an Ghleana, on St. Joseph's Road, Mallow Co. Cork is on a site at the rear of the private cul-de-sac estate of Aldworth Heights and also borders Castle Grove estate, Castle Heights estate and development land owned by O'Flynn Developments, which runs down to the Mallow/Fermoy road.

**Upwards of 140 houses and apartments will be built by Cork County Council on lands at the rear of Aldworth Heights. This proposed development will also link roads infrastructure to another adjoining development of upwards of 400 houses by O'Flynn Developments. Both developments may accommodate upwards of 900 car parking spaces, but in reality the residential car volume will be closer to 1400.**

Assuming half of O'Flynn Developments Houses will use Aldworth Heights access/egress for residents vehicular travel. This will result in a daily traffic volume of 630 vehicles, accessing/egressing St. Joseph's Road, through the private cul-de-sac estate of Aldworth Heights, (26 Houses), This will not be accepted by local residents and, no doubt, should be a key caveat for Bord Pleanala refusal of Cork County Council's Section 177EA planning application, as submitted.

**Some of the consequential results for the private cul-de-sac estate of Aldworth Heights, surrounding estates and local St. Joseph's Road Residents will include:-**

- **Traffic Volume** increase of 630 residential vehicles and circa 90 non-residential vehicles, accessing/egressing the private cul-de-sac estate of Adwrth Heights to and from St. Joseph's Road, on a daily basis.
- **Heavy Construction traffic** accessing/egressing the private cul-de-sac estate of Aldworth Heights and St. Joseph's Road, on a daily basis, for at least 3 years.
- **Construction dust, noise and pollution** for at least two years.
- 600 houses and apartments with **no local amenities to support and inadequate roads infrastructure links.**

Cork County Council's current plan for road access at construction stage and residents permanent road access/egress, when estate is completed and occupied, is through the private cul-de-sac estate of Aldworth Heights, St. Joseph's Road, Mallow County Cork.

**The red arrow in map 1 below shows the access point.**



Map 1

## Bord Pleanála Case reference: JP04.320648

Neither the private cul-de-sac estate of Aldworth Heights nor any other small estate on St. Joseph's Road is feasible or practical for access/egress to a high density housing development. Indeed nowhere in St. Joseph's Road is feasible or practical to service high density housing with access/egress, as St. Joseph's road is of poor standard, lacks safe pedestrian/cycling ways, has reached traffic congestion levels at peak times, is narrow and has very poor street lighting. **The most suitable location for access/egress from both the Cork County Council and private developer's high density developments is on the N72 Mallow/Fermoy Road.**

Map 2, below is a copy of the land registry map:-



Map 2

### Legend - Map 2

**Pink Land Area** - Site for proposed Cork County Council high density housing.

**Green Graph Land Area** - Land owned by O'Flynn Developments and earmarked for current and future high density housing.

**Black Arrow** - Cork County Council planned access/egress through Aldworth Heights private cul-de-sac estate, for construction traffic, and permanently, for all traffic to and from the completed high density housing.

**Red arrows** - Cork County Council's proposed integration roads to accommodate private developers' high density housing.

Local residents are very aware of the realities, impacts and effects, resulting from the proposed development and to keep them abreast of all matters, as they progress. Local resident representatives are alarmed and seriously concerned with regard to the proposed LRD and drafted a consultation document in February 2023 which was emailed to all relevant Cork County Council departments, housing, planning policy and planning, together with all relevant local public representatives, County Mayor and Deputy Mayor.



## **Bord Pleanála Case reference: JP04.320648**

This document includes three alternate proposals by local residents to resolve the bulk of residents' issues, concerns and objections.

**Local residents have a wide range of issues, concerns and objections which were listed in the consultation document as emailed to relevant Cork County Council Departments and to public representatives in February 2023.**

**See Appendix 1** for a copy of the February 2023 consultation document as submitted to Cork County Council.

**Local Residents' proposals for balanced, integrated and effective planning between Spa Glen and St. Joseph's Road**

### **Proposal 1**

Neither the private cul-de-sac estate of Aldworth Heights nor any other small estate on St. Joseph's Road is feasible or practical for access/egress to a high density housing development.

Indeed, from a local resident's perspective, nowhere in St. Joseph's Road is feasible or practical to service high density housing with access/egress, as the road is of poor standard, lacks safe pedestrian/cycling ways, has reached traffic congestion levels at peak times, is narrow and has very poor street lighting.

**Local Residents feel strongly that the most suitable location for access/egress from both the Cork County Council and O'Flynn Developments proposed high density developments is on the N72 Mallow/Fermoy Road. In fact, access/egress from the N72 was Cork County Council's option back in circa 2005, for the now proposed Ard an Ghleana development.**

However, if An Bord Pleanála recommends access/egress to Ard An Ghleana, on St. Joseph's Road, ( an option which local residents feel not suitable, for all the reasons as detailed throughout this submission), then that option for both road access at construction stage and access/egress for residents in the estate when completed, **is the blue arrow location as shown in Map 3 below.**



Map 3

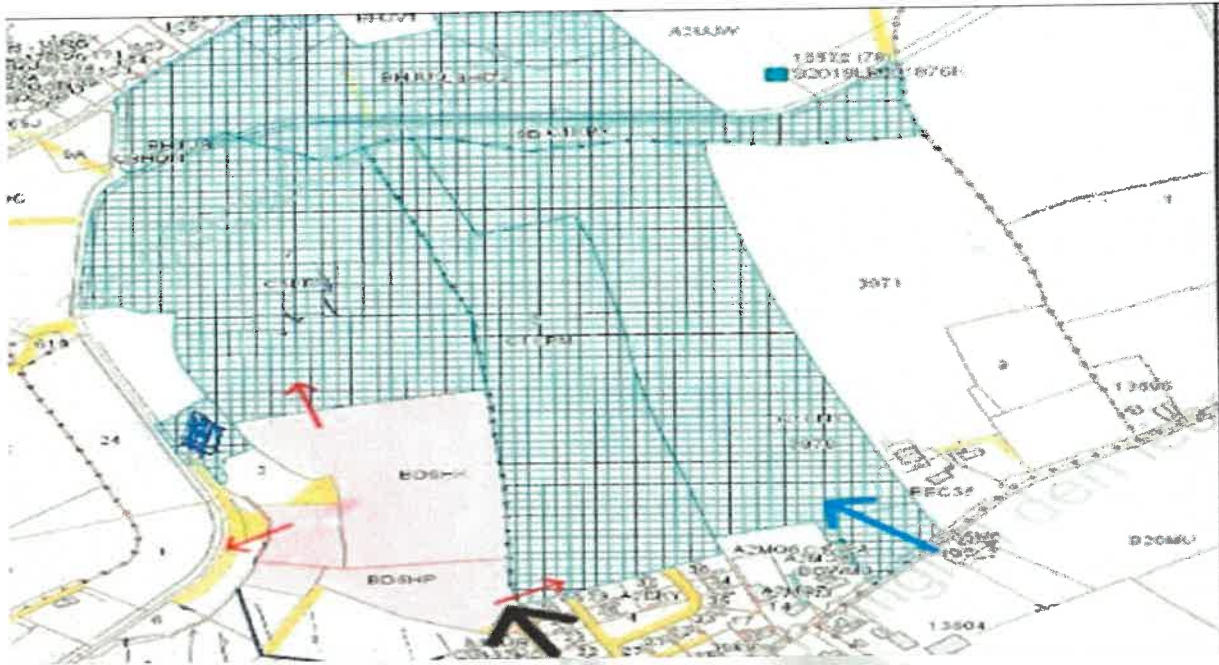
**Map 3 - (Blue Arrow -** Local residents feel that this is the best location for the entrance to the proposed Cork County Council high density development for both construction traffic and completed estate road access/egress to/from St. Joseph's Road. The road construction can also provide a grid network of roads and services to meet the needs of all short, medium and future housing developments within this area). This proposal will negate the need for Cork County Council planned access/egress through the private cul-de-sac estate of Aldworth Heights, for both site construction traffic, and permanently, for all traffic to and from the completed high density social and affordable housing. (see **black arrow** on maps 1 and 3), and **thus avoids local resident's issues, concerns and objections.**



Proposal 2



Map 4



Map 5

**Legend - Maps 4 and 5:** Red arrows indicate the location of Cork County Council proposed road connections to current and future housing being built by O'Flynn Developments, from Cork County Council's LRD. Pink Area indicates Cork County Council's proposed LRD. Green Graph Area indicates O'Flynn Developments current and future high density housing development which will have access/egress to the Mallow/Fermoy Road.

A current section 177AE by Cork County Council to An Bord Pleanála for an LRD, (ABP - 320648), proposes to provide integrating road connections, within its proposed LRD, with O'Flynn Developments' future LRD 2 (as shown by the red arrows in the pink area in the above map 5).

As Cork County Council proposes to provide integrating road connections within its proposed high density housing development, (as shown by the red arrows in the pink area in the above map 5), a logical consequence of this should be that the proposed Cork County Council LRD should be **integrated and built at the same time** as O'Flynn Developments future LRD 2.

Thus access/egress to the overall integrated development of both Cork County Council and the private developer's housing developments, for both construction and completed schemes could be through the local residents' **proposal 1**, as detailed previously, combined with **additional access/egress locations on the Mallow/Fermoy Road**.

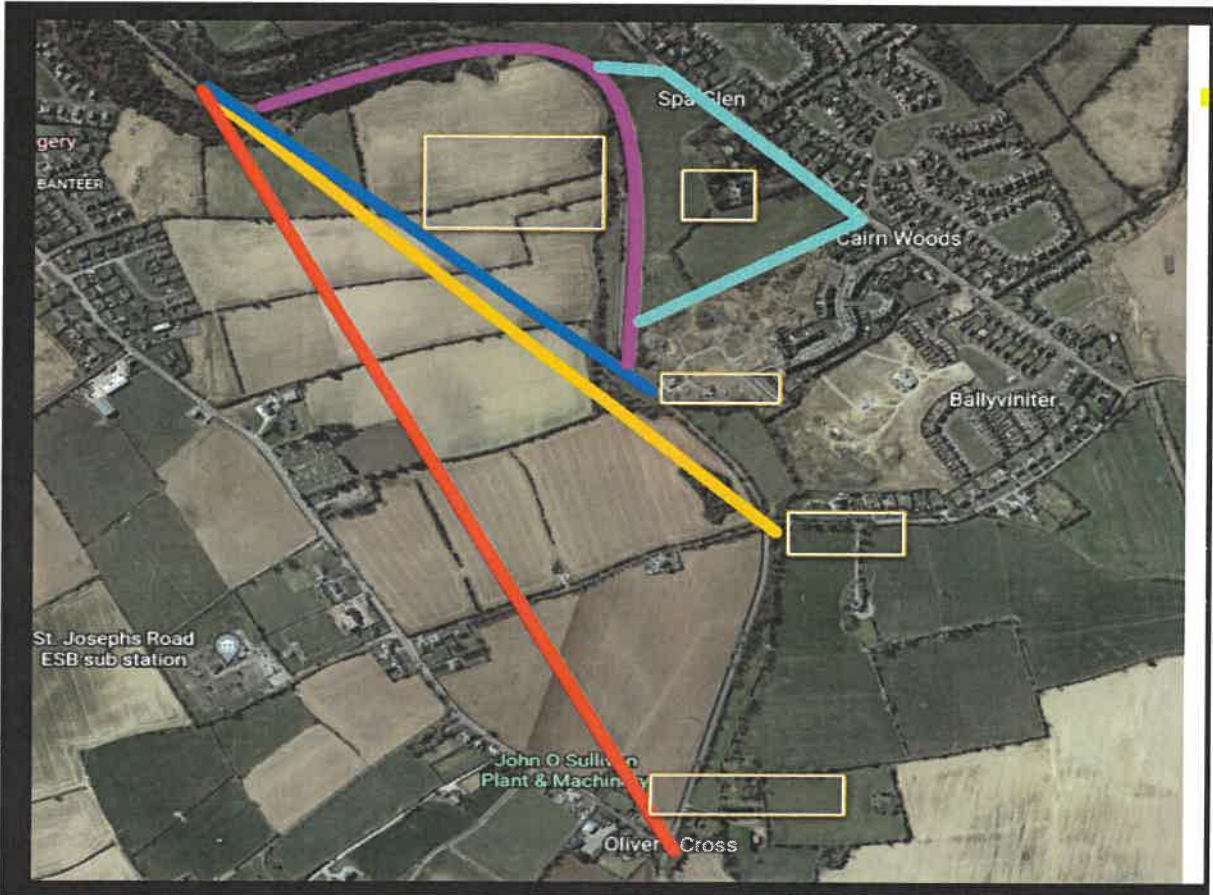
**Proposal 2** will also negate the need for Cork County Council planned access/egress through the private cul-de-sac estate of Aldworth Heights, for both site construction traffic, and permanently, for all traffic to and from the completed high density housing development, (see **black arrow on map 1**), and thus resolve local resident's issues, concerns and objections.



### Proposal 3

The consultation document as submitted to all relevant Cork County Council Departments in February 2023 included a proposal to realign the Mallow Fermoy road and integrate Cork County Council's proposed high density housing development with O'Flynn Developments proposed high density development. **This proposal is outlined below:-**

#### **Three options for Mallow/Fermoy Road Realignment.**



**Map A - Line Colour Legend:-**

- Light Blue/purple Boundary Area - Site location of the **current appeal to An Bord Pleanala Ref: ABP-320525 on O'Flynn LRD 1**
- Purple/Blue Boundary Area - Site Location for future LRD2 by O'Flynn Developments. Proposal 1 details recommendation to integrate **Cork County Council's Section 177AE LRD application to An Bord Pleanala - ABP - 320648 within the Site Location for future LRD2 by O'Flynn**
- Purple line is existing Mallow/Fermoy road section
- Blue line is option 1 road realignment
- Yellow Line is option 2 road realignment.
- Red Line is Option 3 road realignment with all the landbank to the right having the option of further LRD Housing, (CCC and Private), and associated Neighbourhood Amenities

**This presents two approaches for Cork County Council:-**

1. Have the private developer develop the suggested alternative location **Cork County Council's Section 177AE LRD application to An Bord Pleanála - ABP - 320648** by arrangement. Economies of Scale should result in savings for both Cork County Council and positive business results for the private developer. Road realignment option 1 can be subsumed into the overall development plan. Both developments would mirror each other in terms of scale and design which would naturally fit into the landscape.

2. If approach 1 is not feasible, perhaps Cork County Council can purchase the land for **Cork County Council's Section 177AE LRD application to An Bord Pleanála - ABP - 320648** from the private developer and proceed with road realignment option 1, together with development of the suggested alternative location for Ard an Ghleana LRD.

**Advantages of Mallow/Fermoy/Mitchelstown/Dublin Road Realignment**

**Option 1 or 2 road alignment (Blue and Yellow lines on Map)**

- "Billiard table" level site for relocated Ard an Ghleana LRD LRD
- Integrated and balanced LRD's - Private Developer and Cork County Council
- Upwards of 8m euro savings in deadwork and site services to the currently located Cork County Council LRD site. (This saving can be invested in the road realignment, one of option 1, 2 and 3).
- Level ground access/egress for residents of LRD developments
- Closer proximity to Mallow Town and all required amenities, (Shops, schools, etc), for LRD residents
- Road realignment eliminates one or two dangerous junctions and semi-circular curved road.
- Road realignment complements connection to the future Mallow relief road.
- Positive benefits for Mallow Town, LRD residents and CCC.

**Option 3 road realignment (Red Line on Map)**

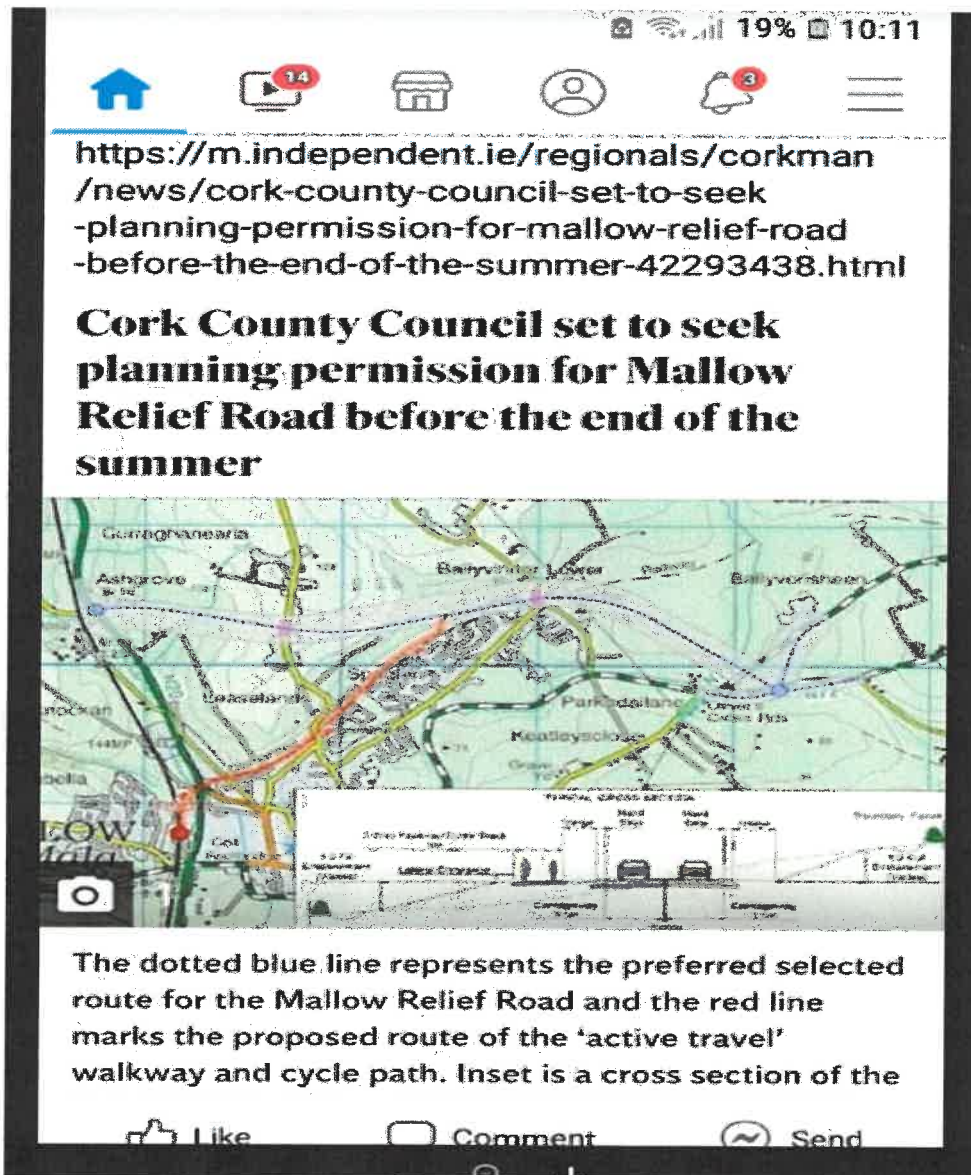
- "Billiard table" level site for relocated St. Joseph's Road Ard an Ghleana LRD
- Integrated and balanced LRD's - Private Developer and Cork County Council
- Upwards of 8m euro savings in deadwork and site services to the currently located Cork County Council LRD site. (This saving can be invested in the road realignment, one of option 1, 2 and 3).
- Level ground access/egress for residents of LRD developments
- Closer proximity to Mallow Town and all required amenities, (Shops, schools, etc), for CCC LRD residents
- Remaining landbank to the right having the option of further LRD Housing, (CCC and Private), and associated Neighbourhood Amenities



- Road realignment eliminates one or two dangerous junctions and semi-circular curved roadway.
- Road realignment complements connection to the future Mallow relief road.
- Positive benefits for Mallow Town, LRD residents and CCC.

## **Mallow Relief Road**

This alternative proposal for Mallow/Fermoy road realignment and relocation of St. Joseph's Road Ard an Ghleana LRD to integrate with Spa Glen private contractor development, is also timely given that Cork County Council is set to seek planning permission for the Mallow Relief Road.



19% 10:11

<https://m.independent.ie/regionals/corkman/news/cork-county-council-set-to-see-planning-permission-for-mallow-relief-road-before-the-end-of-the-summer-42293438.html>

### **Cork County Council set to seek planning permission for Mallow Relief Road before the end of the summer**

The dotted blue line represents the preferred selected route for the Mallow Relief Road and the red line marks the proposed route of the 'active travel' walkway and cycle path. Inset is a cross section of the

Like Comment Send

## **Bord Pleanála Case reference: JP04.320648**

Local residents' proposals 1, 2 and/or 3 provide the **most feasible, and effective way of access/egress for construction traffic and future residents' traffic** of both the Cork County Council's LRD and O'Flynn Developer's scheme, not to mind future housing developments in lands to the Fermoy Road/Oliver's Cross Areas.

**Local Residents Proposal 1, 2 and/or 3 also meet the required:-**

Place-Making/Sustainable Communities Standards

Place-Making Principles Standards

Place-making Design Standards

St. Josephs Road Residents and surrounding estates have no objection to any proposed housing developments, 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:-

- **Implementing Proposals 1, 2 and/or 3 as detailed in this paper.**
- **Delivering a quality and balanced planning approach**
- **Providing upgraded local roads, footpaths, lighting, and safe pedestrian and cyclists ways.**
- **Delivering roads infrastructure to manage high volume traffic movement and avoid gridlock and traffic jams.**
- **Supplying all the required amenities and community supports to deliver quality of residential living to all residents**
- **Including quality Place-Making/Sustainable Communities Standards**
- **Implementing effective Place-Making Principles Standards**
- **Incorporating resident friendly Place-making Design Standards**
- **Delivery of the Mallow Relief Road**

Delivery of the bullet point list, as detailed above, may resolve all current issues, concerns and objections by the private cul-de-sac estate of Aldworth Heights and St. Joseph's Road Residents and negate local residents' objections to An Bord Pleanala.

As stated previously, a private developer is applying to Cork County Council for upwards of 450 new dwellings in Castle Park, St. Joseph's Road, Mallow, Co. Cork. This further compounds local residents' issues and concerns and should focus the minds of Cork County Council that St. Joseph's Road cannot sustain high density housing developments and consequential high density traffic numbers, as the required roads interconnectivity and infrastructure does not exist on St. Joseph's Road. Added to that is the fact that local facilities, community services and amenities do not exist in the area to support high density housing developments. Indeed a prerequisite for any current or future high density housing developments on St. Joseph's Road is the construction of the Mallow relief road, an essential artery to sustain balanced residential friendly development and ensure effective traffic management.

## **Pedestrian and Cyclist Access/Egress - Cork County Council's Options to An Bord Pleanala**

Cork County Council's proposed estate layout accommodates only one access/egress for pedestrians and vehicular traffic which is currently proposed to be through the Aldworth Heights Estate. This document details a variety of constructive issues, concerns and objections to this proposed route and offers alternative solutions.

The current proposed pedestrian egress is a 0.5km meandering steep climb out of the proposed estate followed by a 1.0km walk descent down St. Joseph's Road, a steep hill, to access the bottom end of the town. The return walk will have pedestrians facing a 1km walk up St. Joseph's Road, a steep hill, followed by a 0.5km meandering descent to home. This will prove to be very challenging for many residents and very difficult for children. Of equal and indeed greater challenge will be that for residents who cycle. It's a very rare event to see cyclists on the ascent on St. Joseph's Road. Local residents rarely walk and definitely do not cycle on St. Joseph's Road for fear of loss of limb or life.

**St. Joseph's Road is currently a very dangerous road for both cyclists and pedestrians with high volumes of traffic, very often exceeding the speed limit, not to mind the road being a rat run option for non local traffic.**

Cork County Council are also proposing an alternative and safer route option for both pedestrians and cyclists through Castle Grove Estate from Ard an Ghleana LRD. This shortens the journey to the town centre by 0.75km on a lower walking and cyclist friendly gradient.

Indeed a high quality, to modern standards, pedestrian/cycle access/egress route through Castle Grove Estate from the proposed Ard an Ghleana development, is proposed, subject to planning and negotiation, in the Cork County Council's planning application document titled "Residential Travel Plan" [document no. 2302-TP-D01], by Consultants **Martin Hanley & Associates Ltd.**





**Legend: Red = Site for proposed Ard an Ghleana LRD. Yellow - Cork County Council vehicular, cyclist and pedestrian access/egress. Orange - Cork County Council's proposed alternative cyclist and pedestrian access/egress.**

**Note:** Local residents have also proposed, in this submission, that Aldworth Heights should not be used as an entrance to Ard an Ghleana LRD, offering the three alternatives as outlined in proposals 1,2 and 3 above.

See the two maps above for illustration of proposed safe High Quality Pedestrian footpath and Cycleway routes to/from the Ard an Ghleana development.

**Cork County Councils Pedestrian/Cycleway through Castle Grove may have been identified by them because this route option:-**

- Shortens travel time to town centre by 10 minutes
- Reduces gradient climb on St. Joseph's Road by 80%
- Provides 90% safer access/egress route for both pedestrians and cyclists
- Lowers the risks of traffic accidents on St. Joseph's Road for pedestrians and cyclists.



## **Conclusion and Observers' Signatures List**

**Cork County Council's proposed development of 74 houses and 64 apartments at Ard an Ghleana, St. Joseph's Road**, raises very serious issues, concerns and objections for existing St. Joseph's Road residents' which will hopefully focus the minds of An Bord Pleanala to conclude that St. Joseph's Road cannot currently sustain any further high density housing developments and consequential high density traffic numbers, as the required road interconnectivity and road infrastructure do not exist on St. Joseph's road or in the local area.

Added to that is the fact that local facilities, community services and amenities do not exist in the St. Joseph's Road area to support further LRD's on St. Joseph's Road..

**An absolute essential prerequisite for any current or future LRD's anywhere on 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 development, ensure effective traffic management, deliver safe cyclist and pedestrian ways. Local community amenities and supports are also essential prerequisites. Good Planning Principle**

**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 overall submission to An Bord Pleanala with regard to Cork County Council's Section 177AE application to An Bord Pleanala for the proposed LRD, Ard an Ghleana on St. Joseph's Road, Mallow, Co. Cork.

On the basis of the above, St. Joseph's Road and Aldworth Heights' residents are confident that their issues, concerns and observations will be taken into consideration by An Bord Pleanala prior to a decision being reached on **Cork County Council's proposed development of 74 houses and 64 apartments, namely, Ard an Ghleana, on St. Joseph's Road.**

Observers' Signature List - Page 1

Notice of Planning Application to An Bord Pleanála for Approval - Bord Pleanála Case Number 320648

Name (print)	Signature	Address
FAMHY	Bernard Yaffe	St. Joseph's Rd
Fahy	Marie	-
Shoehn	Emerson Shoehn	-
Aislinn Butler	Aislinn Butler	-
John BUTLER	John Butler	-
Mary O Connell	Mary O Connell	St. Joseph's Rd
PAT O Connell	Patt O Connell	"
J D BOWE	J D BOWE	-
Cathy DUNN	Cathy BOWEN	-
(COLMAN RUTHERFORD)	John Rutledge	-
John	JOHN MURPHY	-
James Kallher	James Kallher	-
Alan Egan	Alan Egan	-
ADAM GYNN	Adam Gynn	-
CLODARH GYNN	Clodagh Gynn	-
TRACEY COONEY	Tracey Cooney	-
(DENIS) DUNLEA	Dennis Dunlea	St Joseph's Rd
DUNLEA	Pauline Dunlea	St Joseph's Rd
LYLLA JAMES	Lylla James	-
SYLVES KILLEN	Sylvia Killen	-
John	John Killen	-
PAT KEMHARZ	Pat Kemharz	✓
BYRYAN	Sean O'Leary	-
Linda Pitts	Linda Pitts	St Joseph's Road
Debra Murray	Debra Murray	St Joseph's Rd

Name (print)	Signature	Address
Maria Louisa...	Maria Louisa...	St Joseph's Rd
...	...	...

FRANCES KENNEDY	Frances Kennedy	St Joseph's Rd
Laura Kennedy	Laura Kennedy	St Joseph's Road
TRISH KENNEDY	Trish Kennedy	St Joseph's Rd

Observers' Signature List - Page 2

Notice of Planning Application to An Bord Pleanála for Approval - Bord Pleanála Case Number 320648

Name (print)	Signature	Address
LINDA DALY	Linda Daly	Castleheights
JOE GLEESON	J Gleeson	Castle Heights
LORETTA HAYES	Loretta Hayes	Castleheights
Philip Hayes	Philip Hayes	Castleheights
Margie Horgan	Margie Horgan	Castleheights
Eileen Connerford	Eileen Connerford	Castle Heights
Cillian Connerford	Cillian Connerford	Castle Heights
Frank Harrigan	Frank Harrigan	Redworth HTS
Pauline Harrigan	Pauline Harrigan	" "
DITO JOSE	DITO	Castle Heights
TOM O'REILLY	Tom O'Reilly	NO.15 CASTLEHEIGHS
Mary O'Reilly	Mary O'Reilly	ST JOSEPHS RD.
ADAM O'REILLY	Adam O'Reilly	MALLOW
SHELLA BUDDLE	S Buddle	3 COLLECTOR MALLOW
PAUL BUDDLE	P Buddle	3 COLLECTOR MALLOW
DENIS O'NEILL	Denis O'Neill	CASTLELANDS, ST. JOSEPHS ROAD
DENIS O'NEILL		18 CASTLE HEIGHTS ST. JOSEPHS RD.
MISSIE LANE		
PHILIP HAYES	Philip Hayes	Redworth HTS
Noel O'Regan	Noel O'Regan	3 Castle Court
STEPHEN O'REGAN	Stephen O'Regan	3 Castle Court
Frank O'Regan	Frank O'Regan	3 Castle Court
Chaire O'Regan	Chaire O'Regan	3 Castle Court

Observers' Signature List - Page 3

Notice of Planning Application to An Bord Pleanála for Approval - Bord Pleanála Case Number 320648

Name (print)	Signature	Address
Bob B. Smith	[Signature]	26 Aldworth Heights
Tom FOLEY	[Signature]	Aldworth Heights
NICOL SHEEHAN	[Signature]	ALDORTH HEIGHTS
Kieran O'Connor	[Signature]	26 Aldworth Heights
Ria O'Connor	Ria O'Connor	26 Aldworth Heights
Carol O'Connor	Carol O'Connor	26 Aldworth Heights
Ben O'Connor	Ben O'Connor	26 Aldworth Heights
ABBIE O'CONNOR	Abbie O'Connor	26 Aldworth Heights
STEVE SKELLY	[Signature]	24 Aldworth Heights
CLODGHUAISH	Clodghuaish	20 Aldworth Heights
DAVID WALSH	[Signature]	20 Aldworth Heights
KEVIN EGAN	[Signature]	15 Aldworth Heights
AOLIE EGAN	Aolie Egan	15 ALDORTH HEIGHTS
CAMIE EGAN	Camie Egan	15 ALDORTH HEIGHTS
Eithne Egan	Eithne Egan	15 ALDORTH HEIGHTS
KIERAN DUGGAN	Kieran Duggan	17 Aldworth Heights
ANNE DUGGAN	Anne Duggan	17 Aldworth Heights
JENNY DUGGAN	Jenny Duggan	17 Aldworth Heights
HARRY DUGGAN	Harry Duggan	17 Aldworth Heights
KOOL KEEFFE	Kool Keefe	16 Aldworth Heights
Jan O'Keefe	Jan O'Keefe	16 Aldworth Heights
JAMIE O'KEEFE	Jamie O'Keefe	16 Aldworth Heights
SUEWIE O'KEEFE	Suewie O'Keefe	16 Aldworth Heights
WIMMIE BOYLE	Wimmie Boyle	* Aldworth Heights
Ursula Boyle	Ursula Boyle	4 Aldworth Heights



Bord Pleanála Case reference: JP04.320648

Notice of Planning Application to An Bord Pleanála for Approval - Bord Pleanála Case Number 320648

Name (print)	Signature	Address
STEVE MURPHY	[Signature]	1 Aldworth Heights
EVAN COLLINS	[Signature]	St Josephs Road, Malton
Eliane Collins	Eliane Collins	12 Aldworth Heights
Julianne Collins	Julianne Collins	Aldworth Hill
CIARA DALY	CIARA DALY	13 ALDWORTH HEIGHTS
GERALD DALY	Gerald Dalry	13 ALDWORTH HEIGHTS
ANTHONY DALY	[Signature]	13 ALDWORTH HEIGHTS
Eilaine Collins	[Signature]	Aldworth Hill
Barbara NIXON	[Signature]	11 Aldworth Heights
Tom Nutton	[Signature]	5 Castle Cross St Josephs Rd
DERMOT O'CONNOR	[Signature]	1 Castle Cross St Josephs Rd
Don O'NEILL	[Signature]	2 Castle Cross St Josephs Rd
EIMEAR O'R	[Signature]	Castle Cross St. Josephs
Sharon	[Signature]	2 Castle Cross Malton
Sharon	[Signature]	2 Castle Cross St Josephs Malton
JENNIFER MAGUIRE	[Signature]	St. Josephs Rd
JOHN MAGUIRE	[Signature]	St. Josephs Rd
DEIDRE FOLEY	[Signature]	18 Aldworth Heights
EVA FOLEY	[Signature]	18 Aldworth Heights

Name (print)	Signature	Address
Ann Kennedy	[Signature]	19 Aldworth Heights
Ann Kennedy	[Signature]	19 Aldworth Heights

Name (print)	Signature	Address
BRIAN HORGAN	[Signature]	21 Aldworth Heights
JESSICA HORGAN	[Signature]	St. Josephs Road
Eileen Horgan	[Signature]	Malton



**Appendix 1 - Consultation Document**

**Cork County Council**

**Proposed Housing Development on St. Joseph's  
Road, Mallow, Co. Cork.**

**Design Stage Consultation Document**

**Prepared by:**

**St. Joseph's Road and Aldworth Heights Residents  
Representative Group**

**Submitted By:**

**St. Joseph's Road and Aldworth Heights Residents  
Representative Group**

**Contact Representative:-**

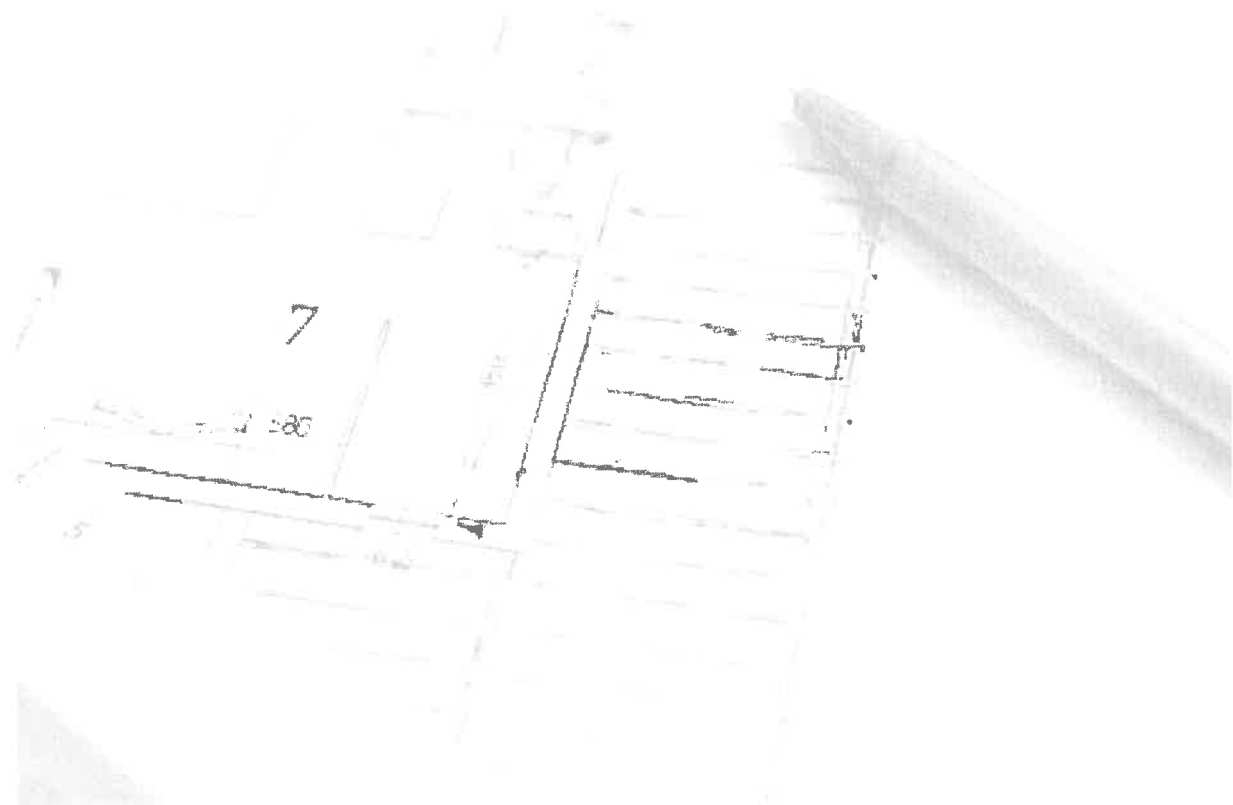
**Frank Heffernan - Group Secretary**

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

**Bord Pleanála Case reference: JP04.320648**

**Mobile 0876345874**

**Submission Date January 2023.**





**Contents**

<b>Foreword</b>	<b>Page 2</b>
<b>Suggested Alternative Location for St. Joseph's Road Development which incorporates proposals on three options for Mallow/Fermoy Road Realignment.</b>	<b>Page 3</b>
<b>Land Registry Ownership Opportunity</b>	<b>Page 4</b>
<b>Advantages of Alternative Location for St. Joseph's Road Development</b>	<b>Page 6</b>
<b>Mallow Relief Road</b>	<b>Page 7</b>
<b>Current Site Location - Proposed Housing Development, St. Joseph's Road, Topographical Issues</b>	<b>Page 8</b>
<b>Further Disadvantages to the current site</b>	<b>Page 9</b>
<b>Aldworth Heights Residents Issues and Concerns</b>	<b>Page 19</b>
<b>Summary</b>	<b>Page 22</b>
<b>Proposed Alternative Location</b>	<b>Page 24</b>
<b>Addendum 1 - Engineers Report as submitted to Cork County Council - May 2007</b>	<b>Page 25</b>
<b>Addendum 2 - Three Bord Pleanala case examples on decision to refuse and the associated grounds for refusal.</b>	<b>Page 34</b>
<b>Addendum 3 - Design Manual for Quality Housing</b>	<b>Page 37</b>
<b>Addendum 4 - St. Joseph's Road Concerns</b>	<b>Page 44</b>
<b>Addendum 5 - Historical Communications and Submissions by Aldworth Heights Residents (2007)</b>	<b>Page 46</b>
<b>Closing Statement</b>	<b>Page 59</b>

## **Foreword**

Minister Ryan joins NTA as €290m is made available for walking and cycling infrastructure this year

The Minister for Transport Eamon Ryan TD today confirmed that the National Transport Authority (NTA) has allocated funds to Ireland's local authorities with a view to spending €290m on walking and cycling infrastructure in 2023.

This substantial investment will fund approximately 1,200 Active Travel projects, contributing to the development of almost 1,000km of new and improved walking and cycling infrastructure across the country by 2025. This includes the development of segregated cycle lanes and widened footpaths, new walking and cycling bridges, and new pedestrian crossings.

In addition to the planned developments in cities, communities up and down the country are also set to benefit from today's announcement with projects such as the Donegal Town One-Way Active Travel Scheme and the Monaghan Town Greenway Upgrade set to start in 2023.

In addition, and as a key part of this announcement, Active Travel funding will ensure that the [Safe Routes to School programme](#) will continue to provide for safer cycling and walking facilities for many more schools across the country. Construction is expected on dozens of front of school treatments throughout 2023.

### **Minister for Transport Eamon Ryan said:**

"Continuous and substantial funding for active travel across the country is a key commitment in the Programme for Government and a cornerstone of our Transport Strategies. Last year, all of the money allocated was drawn down by local authorities and I am confident that the same will happen this year. This will mean that communities across the country will be better connected **with safe and people-friendly corridors to visit friends, go to the shops, or cycle or walk to school, sports training or other activities.**

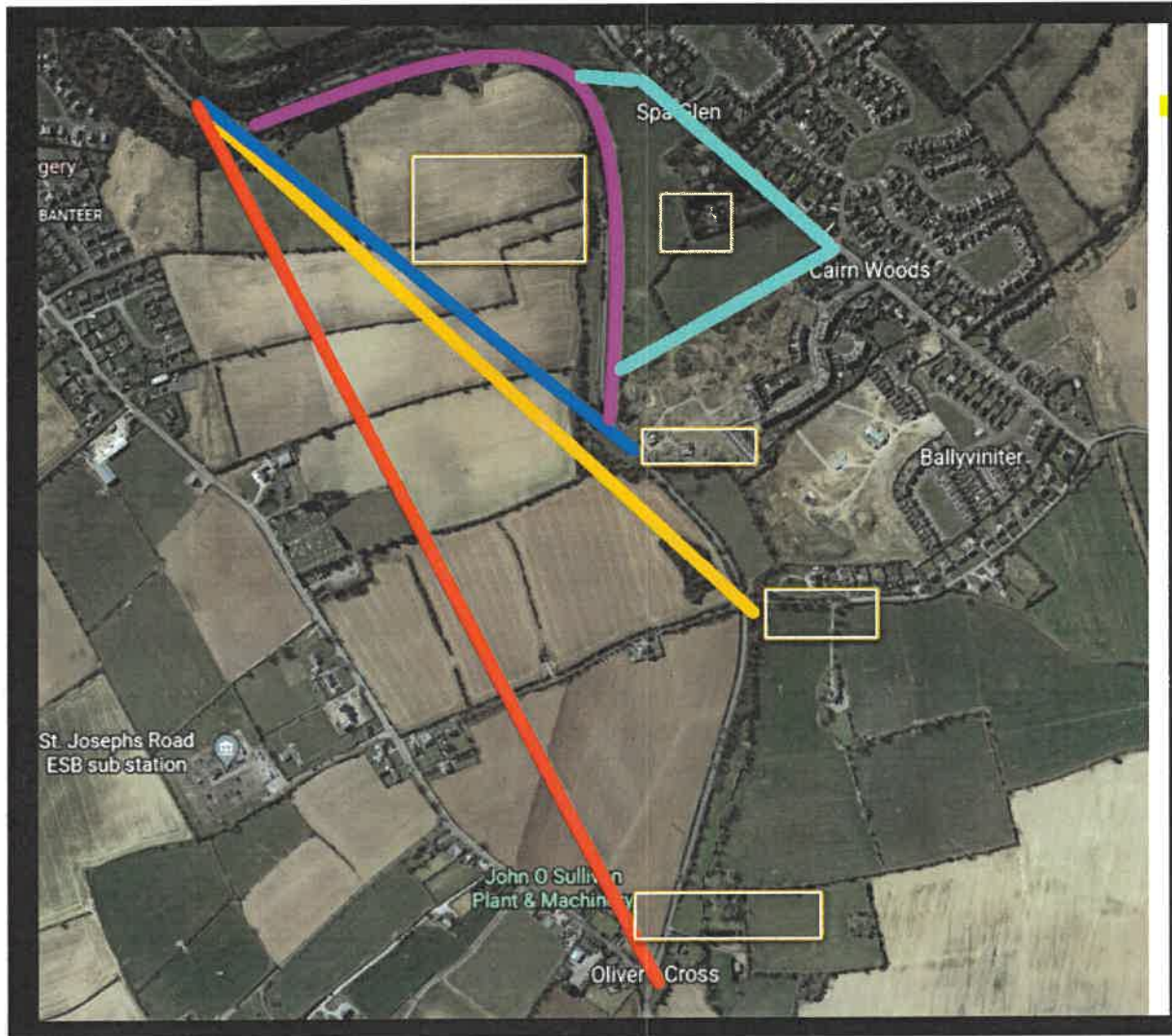
"People very often think that Greenways, cycle-ways or walkways are primarily tourism amenities. Of course, they serve that purpose really well, but **first and foremost they are about local people and improving local life, connecting suburbs, local villages or townlands that have often become disconnected from one another because of busy and dangerous roads.**

"The **benefits of this investment are immense, locally and nationally.** Not only are we making our cities, towns and villages greener and more livable, we are also helping to reduce Ireland's carbon emissions. In transport, we have a significant challenge to reduce our emissions by 50% by 2030. To achieve this, **we have to encourage more people to choose sustainable ways of travelling.** However, as we have seen already with the greenways, walk and cycle ways, **once we build them, they become instantly popular and we don't really have to do much to encourage people to make the sustainable switch.**

**Source (01/02/2023)**

<https://www.gov.ie/en/press-release/67058-minister-ryan-joins-nta-as-290m-is-made-available-for-walking-and-cycling-infrastructure-this-year/>

**Suggested Alternative Location for St. Joseph's Road Development which incorporates proposals on three options for Mallow/Fermoy Road Realignment.**

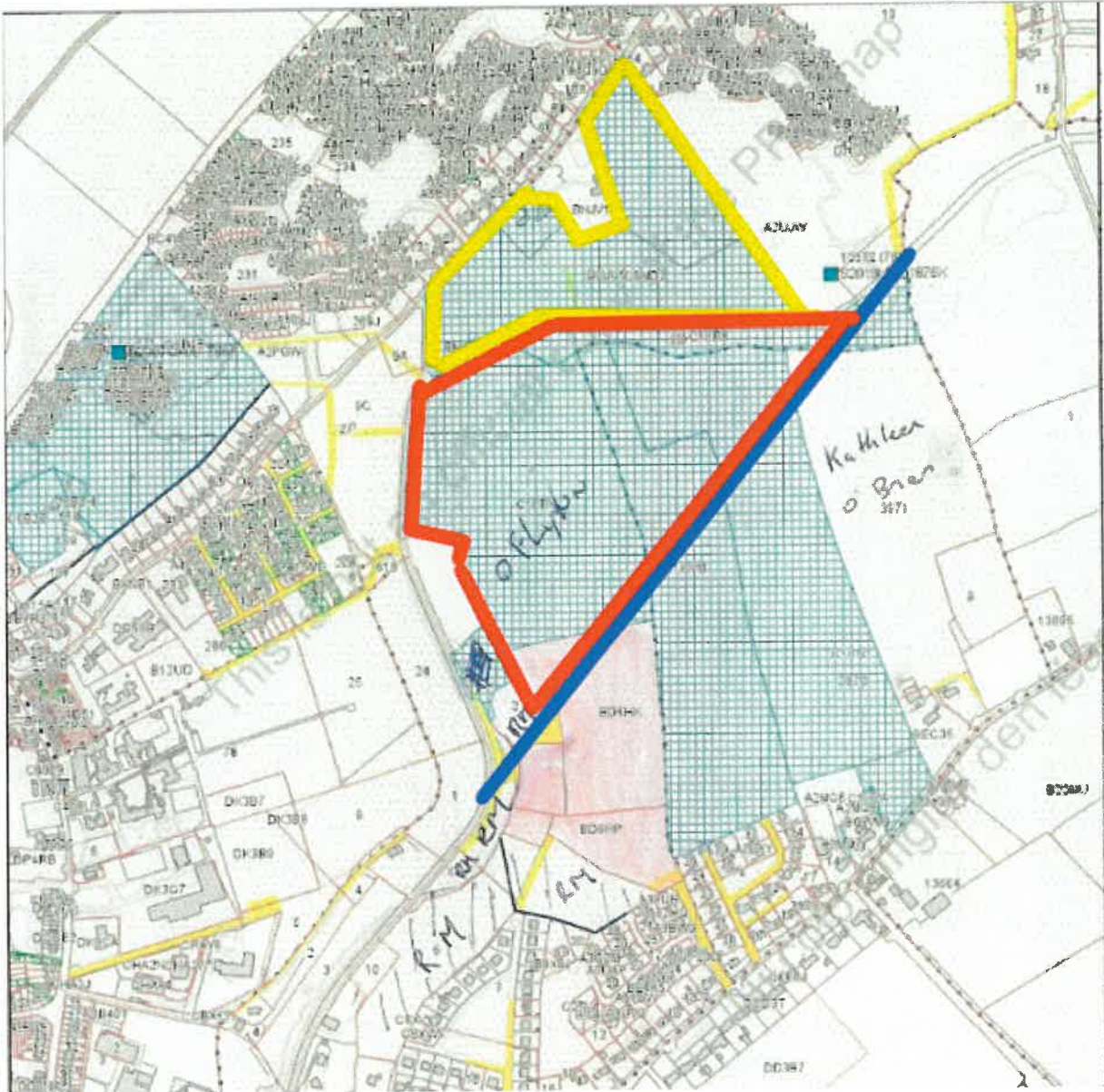


**Line Colour Legend:-**

- Light Blue/Purple triangular area is Spa Glen CCC LRD
- Purple line is existing Mallow/Fermoy road section
- Blue line is option 1 road realignment
- Curved Purple/Blue triangular area is relocated St. Joseph's Road CCC LRD
- Yellow Line is option 2 Road realignment.
- Red Line is Option 3 road realignment with all the landbank to the right having the option of further LRD Housing, (CCC and Private), and associated Neighbourhood Amenities



**Land Registry Map Ownership Details Which Supports The Suggested Alternative Location for St. Joseph's Road Development which incorporates proposals on three options for Mallow/Fermoy Road Realignment.**



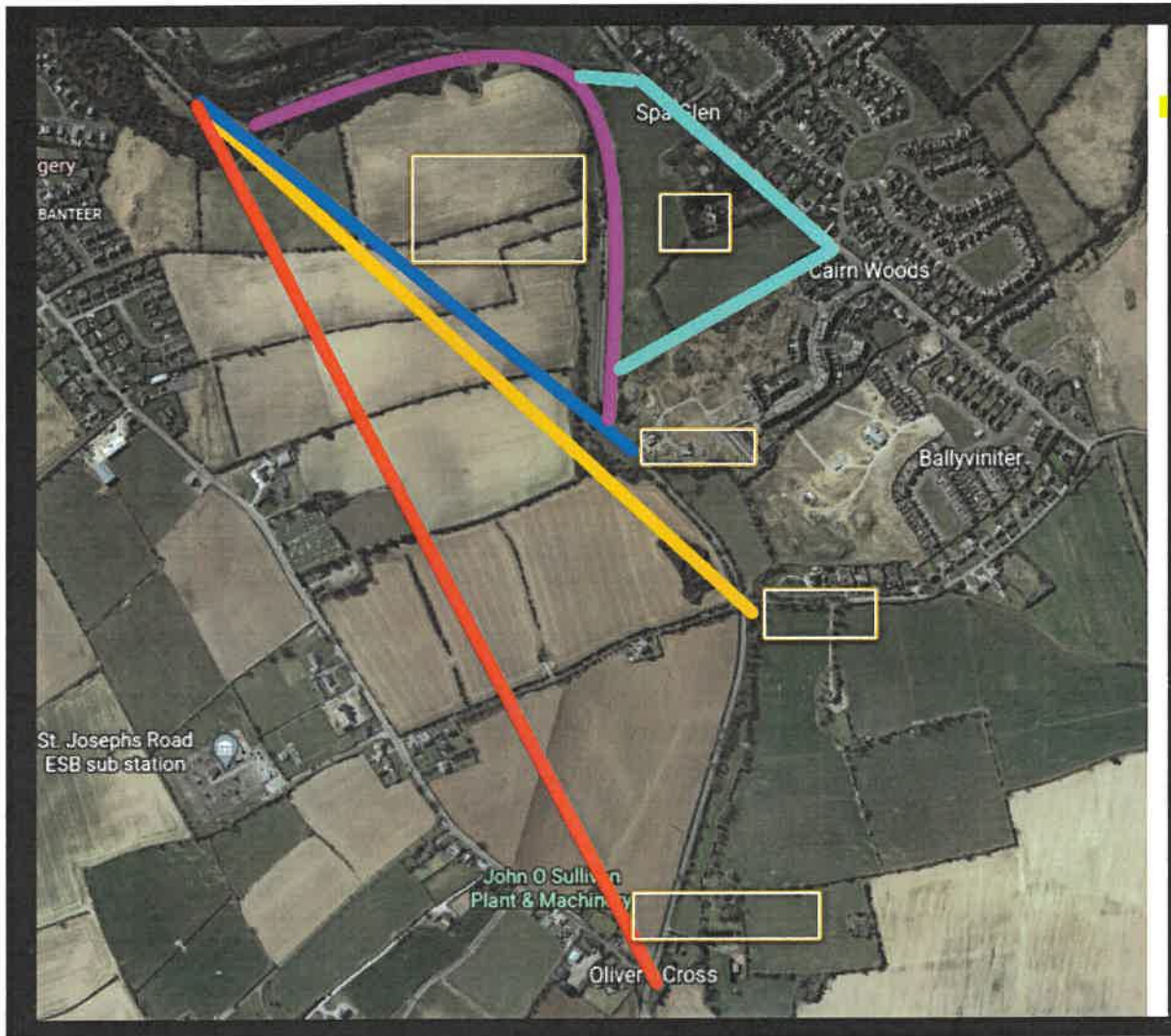
**Yellow lined areas are Cork County Council owned, Red lined areas O'Flynn & Co Developers property. Blue Line is Mallow/Fermoy Road Realignment Option 1**

The suggested alternative location for St. Joseph's Road Development which incorporates proposals on three options for Mallow/Fermoy Road Realignment, may be currently owned by O'Flynn & Co Developers. **(See red lined area in Land Registry map above).**

This suggested alternative location for St. Joseph's Road Development is directly opposite the Cork County Council Lr Ballyvinitier site, **(see yellow lined area at Spa Glen, Land Registry map above)**, currently at Planning Application Stage with Cork County Council. The **Blue Line** represents the proposed Mallow/Fermoy Road Realignment Option 1



## Google Earth Map Illustration



Google Earth Map Legend:-

- Light Blue/Purple Triangle = Spa Glen Development
- Purple/Blue Area = Proposed Alternative Location for Cork County Council St. Joseph's Road Development.
- Blue/Yellow/Red Straight Lines = 3 Options on Mallow/Fermoy Road realignment

This presents two approaches for Cork County Council:-

1. Have O'Flynn & Co Developers develop the suggested alternative location for St. Joseph's Road Development for Cork County Council by arrangement. Economies of Scale should result in savings for both Cork County Council and positive business results for O'Flynn & Co Developers. Road realignment option 1 can be subsumed into the overall development plan.

## **Bord Pleanála Case reference: JP04.320648**

2. If approach 1 is not feasible, perhaps Cork County Council can purchase the land for the Suggested Alternative Location for St. Joseph's Road Development, from O'Flynn & Co Developers and proceed with road realignment option 1, together with development of the suggested alternative location for St. Joseph's Road Development.

### **Advantages of Alternative Location for St. Joseph's Road Development include:-**

#### **Option 1 or 2 road alignment (Blue and Yellow lines on Map)**

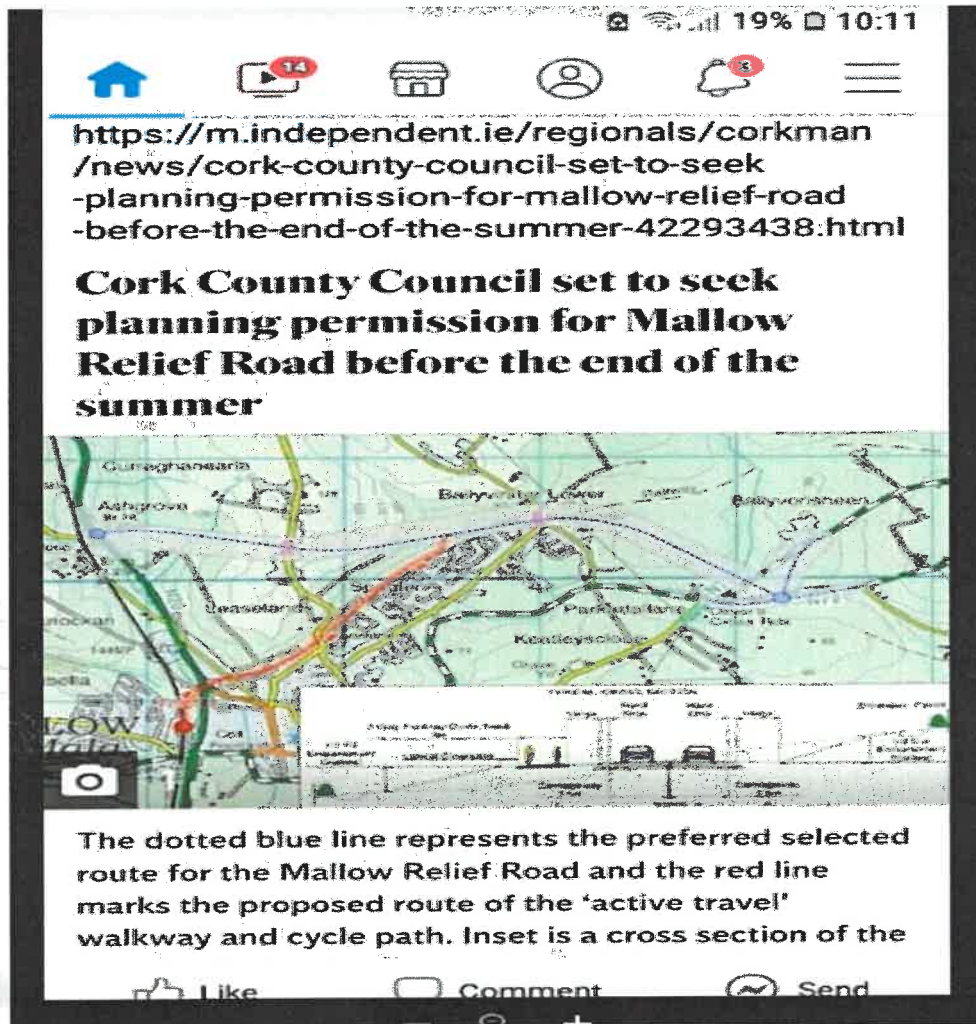
- "Billiard table" level site for relocated St. Joseph's Road CCC LRD
- St. Joseph's Road relocated LRD integrated with Spa Glen CCC LRD
- 2m euro savings in deadwork and site services to the currently located St. Joseph's Road site. (This saving can be invested in the road realignment, one of option 1,2 and 3).
- Level ground access/egress for residents of LRD developments
- Closer proximity to Mallow Town and all required amenities, (Shops, schools, etc), for LRD residents
- Road realignment eliminates one or two dangerous junctions and semi-circular curved road.
- Road realignment compliments connection to future relief road.
- Win-win for Mallow Town, LRD residents and CCC.

#### **Option 3 road realignment (Red Line on Map)**

- "Billiard table" level site for relocated St. Joseph's Road LRD
- St. Joseph's Road relocated LRD integrated with Spa Glen LRD
- 2m euro savings in deadwork and site services to the currently located St. Joseph's Road site.
- Level ground access/egress for residents of LRD developments
- Closer proximity to Mallow Town and all required amenities, (Shops, schools, etc), for CCC LRD residents
- Remaining landbank to the right having the option of further LRD Housing, (CCC and Private), and associated Neighbourhood Amenities
- Road realignment eliminates one or two dangerous junctions and semi-circular curved roadway.
- Road realignment compliments connection to future relief road.
- Win-win for Mallow Town, CCC LRD residents and CCC.

## Mallow Relief Road

This alternative proposal for Mallow/Fermoy road realignment and relocation of St. Joseph's Road development to integrate with Spa Glen development, is also timely given that Cork County Council is set to seek planning permission for the Mallow Relief Road.





**Current Site Location - Proposed  
Housing Development, St. Joseph's Road,  
Topographical Issues**

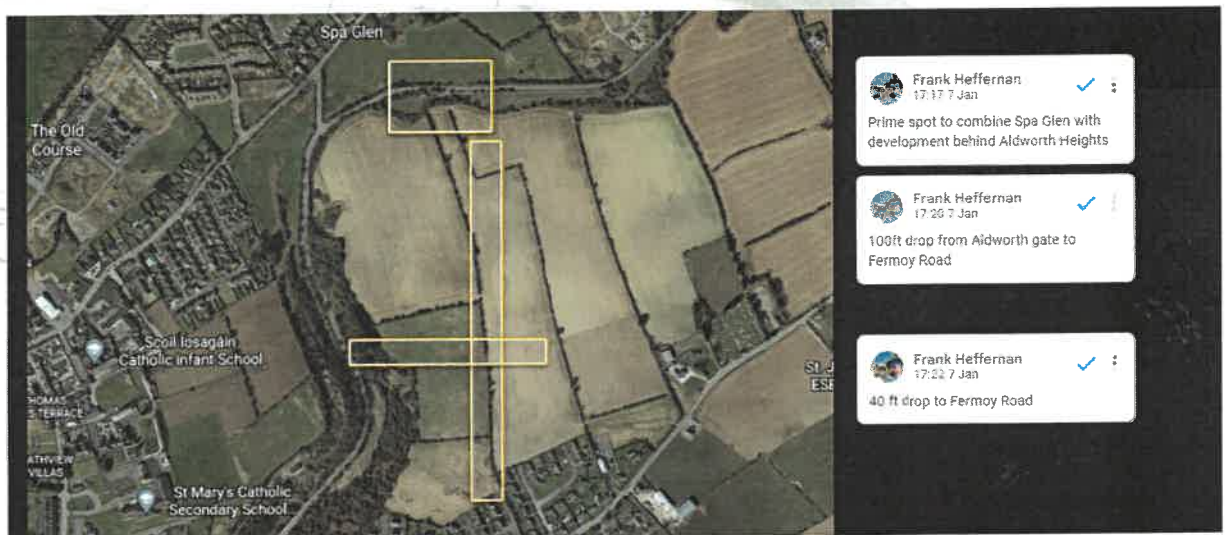
Click on link for bench mark values:-

[https://drive.google.com/file/d/16eSmiHvL9swCLsyBshS6FtuFyKGte88p/view?usp=share\\_link](https://drive.google.com/file/d/16eSmiHvL9swCLsyBshS6FtuFyKGte88p/view?usp=share_link)

(Source of bench mark values) : -

<https://en-ie.topographic-map.com/map-gdtp/Mallow/?center=52.14642%2C-8.63487&zoom=15>

A summary/composite map of these benchmark figures is shown below:



- A key disadvantage of this site from a topographical feature, is a slope of 100ft from south to North, with a 40ft fall from east to west.
- This will result in at least an additional 8m euro investment in dead work to get dwellings to a finished floor level. There will also be an additional cost of at least 1m euro to install site services.
- This 8m additional cost can be offset by relocating the St. Joseph's Road development as proposed on pages 1 and 2 above.
- The 8m euro saved in deadwork and additional site services can be invested in the chosen option for realignment of the Mallow/Fermoy road.



**Further Disadvantages to the current site include:-**

*(Note: Extracts from CORK COUNTY DEVELOPMENT PLAN 2022 - Volume 3 North Cork - Mallow Section. ( In Italics))*

(Note: St. Joseph's Road and Aldworth Heights Residents Concerns are in normal font.)

***Vision and Strategic Context***

**2.4.1**

***Mallow is designated as a Key Town in the Regional Spatial and Economic Strategy (RSES) for the Southern Region. The overall vision for Mallow is to sustainably strengthen the employment-led growth and town centre-led regeneration of Mallow as a regional economic driver, leverage its strategic location and accessibility on inter-regional road and rail networks to build upon inherent strengths, in particular food production and tourism potential, while protecting and enhancing the natural environment of the Blackwater Valley. It aims to ensure new development delivers enhanced quality of life for all, based on high quality residential, working and recreational environments, respectful of the unique character and heritage of the town and supported by a good range of services and community facilities.***

The current site location and proposed development will not provide high quality residential, working and recreational environments, respectful of the unique character and heritage of the town and supported by a good range of services and community facilities. Such services, community facilities and neighbourhood amenities do not exist in the St. Joseph's Road area.

***Planning Considerations and Proposals***

***Population and Housing***

**2.4.5**

***The 2016 Census recorded a population for Mallow of 12,459 representing growth of 854 persons since Census 2011. The Plan takes a departure from a primarily greenfield, edge of town expansion response to housing land supply in order to respond to National Planning Framework policy changes in the way we plan and deliver housing across the State. This change of direction has created a new focus on the consolidation of the existing built envelope.***

Existing St. Joseph's Road residents recognise the need for a departure from a primarily greenfield, edge of town expansion response to housing land supply in order to respond to National Planning Framework policy changes in the way we plan and deliver housing across

## **Bord Pleanála Case reference: JP04.320648**

the State. Existing residents also acknowledge That this change of direction has created a new focus on the consolidation of the existing built envelope.

However the current proposed site is not suitable for Large Residential development given the topographical nature of the land, the proposed development will not provide high quality residential, working and recreational environments, respectful of the unique character and heritage of the town and supported by a good range of services and community facilities. Such services, community facilities and neighbourhood amenities do not exist in the St. Joseph's Road area.

### **2.4.6**

***Mallow has been allocated a population target of 15,351 in the County Development Plan 2028 representing growth of just over 2,892 people on Census 2016 figures. In order to accommodate this level of population growth, an additional 1,105 housing units will be required for the period 2020-2028. Based on the National Planning Framework's requirement to deliver 30% of the core strategy requirement within the built envelope of the town and the Plan's commitment to deliver higher densities, a lower land requirement is now required than in previous plans.***

St. Joseph's Road and Aldworth Heights Residents understand the need for Cork County Council's commitment to deliver higher densities with a lower land requirement being now required than in previous plans. This can only be achieved through people/family centred design and development to include high quality residential, working and recreational environments, respectful of the unique character and heritage of the town and supported by a good range of services and community facilities. Such services, community facilities and neighbourhood amenities do not exist in the St. Joseph's Road area.

### **2.4.7**

***As part of the Council's commitment to deliver compact growth within the town, a new focus is placed on the better utilisation of the existing building stock, prioritisation of brownfield and under-utilised land and identification of regeneration and infill opportunities that can contribute positively to Mallow's housing stock and 30% target of 331 units. It is proposed that the 1,105 new housing units required to 2028 be delivered primarily on Residential and MixedUse Zoning including Compact Growth Sites.***

St. Joseph's Road and Aldworth Heights Residents are pleased to see that a new focus is placed on the better utilisation of the existing building stock, prioritisation of brownfield and under-utilised land and identification of regeneration and infill opportunities that can contribute positively to Mallow's housing stock and 30% target of 331 units. However little or no progress has been achieved on the better utilisation of the existing building stock.

St. Joseph's Road and Aldworth Heights Residents also recognise the need that the 1,105 new housing units required to 2028 be delivered primarily on Residential and MixedUse Zoning including Compact Growth Sites. Such developments can only be beneficial where community based services, community facilities and neighbourhood amenities exist. Such neighbourhood amenities and supports do not exist in the St. Joseph's Road area.

**2.4.8 Lands to the north of the town which are part of an unfinished development (MW-R-02) as well as a smaller infill green field site directly north of the town centre (MW-R-07) have been identified as lands that can contribute to the compact growth of the town by virtue of their proximity to the town centre and ability to fulfil the 10 minute town concept. Further sites are identified as regeneration/targeted opportunity sites within the town (see later section). The remaining capacity can be accommodated via addressing vacancy within the existing building stock (including through Living Over the Shop) and via opportunities within the Existing Built Up Area of the town. The 2018 Urban Capacity Study identified that there was considerable potential within the existing building stock to accommodate additional residential uses. It identified that there were a total of 130 additional residential units that could be potentially accommodated within the vacant upper floors. There is significant capacity within the existing building stock and urban fabric of the town to deliver additional residential uses which can reinforce the delivery of a compact town centre.**

St. Joseph's Road residents are pleased to see that Cork County Council recognise the 10 minute town concept. The proposed location of the St. Joseph's Road development creates a 25 minute town concept, uphill out of the estate and downhill to the town centre, with the reverse experience out of the town centre.

Another point to note is that little or no progress has been achieved with capacity being accommodated via addressing vacancy within the existing building stock (including through Living Over the Shop) and via opportunities within the Existing Built Up Area of the town.

Similarly little or no progress has been achieved in absorbing existing significant capacity within the existing building stock and urban fabric of the town to deliver additional residential uses which can reinforce the delivery of a compact town centre.

**2.4.9 To fulfil the remaining housing land requirement additional lands have been included as residential zones. These include the MW-R-03 and MW-RAP-04 to the north east, the MW-R-01 and MW-R-08 to the east, and the MW-R-05 and MW-R06 sites to the west.**

St. Joseph's Road residents strongly feel that residential zones will not function or flourish in locations which totally lack community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, pedestrian and cycle paths, and local public transport. All these services and amenities do not exist anywhere on St. Joseph's Road.

**2.4.10 It is considered appropriate that some strategic reserve be retained for future residential development and an additional 4 areas have been zoned in this plan as Residential Reserve. This includes a significant portion of the former North East Urban Expansion area which includes lands north of St. Joseph's Road (MW-RR-01) which makes up an area of c.56 hectares.**

St. Joseph's Road residents strongly feel that residential zones will not function or flourish in locations which totally lack community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, pedestrian and cycle paths, and local public transport. All these services and amenities do not exist anywhere on St. Joseph's Road.

**Placemaking and Public Realm**

**2.4.19 Outside of the town centre the approach to placemaking, housing and other development will be guided primarily by zoning and the objectives and guidance as set out in Housing and Placemaking chapters of the Plan. See Chapter 3 Settlements and Placemaking and Chapter 4 Housing.**

(Note - Extracts from Chapter 3, Settlements and Placemaking ( *In Italics*))

(Note - St. Joseph's Road and Aldworth Heights Residents Concerns are in normal font).

**Chart Extract:-**

3.1.7 The following diagram demonstrates how place-making and sustainable communities are interchangeable:



Figure.3.1: Egan Wheel (Source Adapted "Egan Wheel" Egan 2004



## Bord Pleanála Case reference: JP04.320648

St. Joseph's Road And Aldworth Heights Residents strongly feel that the proposed St. Joseph's Road Development location will not meet the Place- Making and Sustainable Communities Model, in key areas including, Well Connected, Well Served, Active, Inclusive and Safe, and Fair for Everyone.

### Table Extract:-

Table 3.1: Principles of Placemaking		
Theme	Strategic Objectives	Local Outcomes
Character and Identity	To promote local character within the townscape and villagescape of Cork County's settlement network by responding to and reinforcing locally distinctive patterns of development, landscape and culture and protecting the historic environment.	Elements of local distinctiveness such as local materials, building forms and elements including fenestration patterns, awnings, roof profiles and features should inform the design and detailing of new development and reinforce the palette of the existing place. For example the use of wall hung slates on building facades in Kinsale are a local distinctive feature of the town's character and similarly 1st floor bay windows on Thomas Davis Street, Mallow is a unique response to the town's historic function as a Spa town.
Continuity and Enclosure	To promote the continuity of street frontages and the enclosure of space by development which clearly defines private and public areas and promotes active frontages at street level.	Consistent building lines are required to create a strong street frontage, to provide enclosure to a street or square and generates active frontages with frequent doors and windows. Boundaries are also important elements to enclose space and should be designed and constructed to reflect its local context of either natural stone construction in local traditional style or clearly modern style stone wall or capped and plastered concrete walls.
Quality of the Public Realm/ Open Space	To promote public spaces and routes that are attractive, safe, uncluttered and sensitively integrated into the natural environment, facilitate sustainable access for the public to nature, and work effectively for all in society, including disabled and older people.	The best public spaces often have nodes of activity complimented by quiet zones, stimulate the senses, use quality local materials, are sensitively integrated into the natural environment, have built-in versatility and are complimented by a coherent street furniture, lighting and signage strategy e.g. Clonakilty.
Ease of Movement	To promote accessibility and local permeability by making places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport.	Streets and routes should be direct, overlooked, barrier-free and measures used to slow traffic down to encourage pedestrian and cycling safety. Use of DMURS to apply at all settlement levels.
Legibility	To promote legibility through development that provides recognisable routes, intersections and landmarks to help people find their way around.	Emphasise the hierarchy of place with a graduation of building heights and density from the core, framing views and landmarks and creating new focal points.
Adaptability	To promote adaptability through development that can respond to changing social, technological and economic conditions.	Maintain separate own door access to upper floors of buildings in the town/ village centre to maintain vertical mixed use profiles and future proof the building's adaptability.
Diversity and Vibrancy	To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.	To ensure the town and village cores contain a mix of residential, social and economic uses to maintain a vibrancy beyond business hours. A variety of house typologies, sizes and tenures are also required to meet the differing needs of the population profile.



## Bord Pleanála Case reference: JP04.320648

St. Joseph's Road and Aldworth Heights Residents are of the opinion that the proposed St. Joseph's Road Development location will not meet many of the principles of Placemaking in key areas which include, Character and Identity, Quality of the Public Realm/Open Space, and Ease of Movement.

### Table Extract:-

Table 3.2 Placemaking Design Standards Checklist			
Scale	Design Element	Design Response	Relevant Standards
Settlement Pattern	Major Infrastructure Landscape Water management Road & Cycle Network Open Space Character Areas	Railway Station, bridge, public transport facilities Native species, framing views, work with topography Drainage, recycling, Water features Hierarchy of routes designed for active movement Typology, features and connectivity Centres, neighbourhoods, walkable catchments, parcel size and sub-divisions.	SuDS DMURS
Urban Form	Connections Street network Block pattern Building lines Plot form Building location Density  Views and vistas	Edge treatments, boundaries Urban Grain, grid types, permeability Block form, privacy distances Frontage continuity, use of set backs Plot size, width Orientation, location on plot, natural surveillance Dwellings per hectare, plot ratios, intensification areas Relation to topography, corridors	Urban Capacity Study  Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009).
Urban Space	Open Space Public Space Public/ Private Space Gardens  Play Spaces  Carriageways Walkways & Cycleways	Hierarchy/ mix of typologies, connectivity, landscape Patterns, typologies, enclosure, management Clear definition between public and private spaces Standards/Use of native species/Retain natural features Standards, equipment, management  Junction design, traffic calming, route standards Permeable, safe, connected, removal of barriers	Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009). DMURS
Built Form	Building Form Building type  Building Frontage  Mix of Uses Townscape Features  Heritage Assets Street Trees Soft Landscaping Public Realm	Bulk, mass, height, roof profiles, basements Mixed residential typologies (including age-friendly/lifetime homes), mixed use formats, non residential typologies; Active frontage, entrance frequency, architectural styles, features, proportions, rhythms, expression, window / wall ratios, materials, colours, balconies, porches, signage, shopfront design Vertical and horizontal mixes, second door access Eave lines, rooflines, chimneys, corner treatments, landmark /background treatments, focal points  Integration, preservation, management Native species, placement Biodiversity friendly, climate adaptable species Minimise clutter and ensure Street furniture, bollards, boundary treatments / materials, public art, paving materials, colours, utilities equipment, street lighting, amenity lighting, bus shelters, CCTV, public toilets, cycle storage and parking enhance the street.	RIAI Town and Village Toolkit Urban Capacity Study  Universal Design Age Friendly Towns
Technical Issues		Energy Efficiency Access standards, parking/ disabled parking Cycle stands Communal refuse storage & recycling Mix of tenure	

St. Joseph's Road and Aldworth Heights Residents are of the opinion that the proposed St. Joseph's Road Development location will not meet many Placemaking Design Standards in key areas including Settlement Pattern, Urban Form, Urban Space and technical Issues.

***(Note: Further Extracts from CORK COUNTY DEVELOPMENT PLAN 2022 - Volume 3 North Cork - Mallow Section. ( In Italics))***

(Note: St. Joseph's Road and Aldworth Heights Residents Concerns are in normal font.)

### **Green Infrastructure and Recreation**

***2.4.30 There remains a strong need to improve movement and accessibility to existing recreational facilities. The southside of the town is relatively underprovided for in terms of recreational infrastructure and will benefit considerably from the enhanced connectivity that will be provided by the new boardwalk once completed. This will assist in improving overall accessibility for both pedestrian and cyclist alike by counteracting the current severance issues. Any future Transport Plan should consider additional opportunities to integrate the northern and southern banks of the river including the provision of a pedestrian and cycle bridge from the south bank through to the centre of the town park to further connect employment and residential uses to this and other town centre amenities as well as the railway station.***

St. Joseph's Road and Aldworth Heights Residents continue to experience a severe lack of recreational facilities, recreational infrastructure, green infrastructure, neighbourhood amenities and enhanced connectivity. St. Joseph's Road and Aldworth Heights Residents feel that St. Joseph's Road is in a very poor condition and lacks the ability to cater for large volumes of traffic, it also lacks safe and adequate pedestrian and cyclist ways, not to mind, poor street lighting.

### **Landscape**

***2.4.43 Much of the lands which adjoin the greenbelt are transition zones from urban to rural with zonings such as recreation, amenity and greenbelt reflective of both existing and future uses. Many of these lands are vital in preserving the attractive and green landscape setting of the town and ensuring a more compact and orderly form of development. Development proposals on zoned lands in elevated locations will need to be cognisant of their wider visual impact and mitigate appropriately through landscape treatment and design.***

St. Joseph's Road and Aldworth Heights Residents have very serious concerns on the wider visual impact of the proposed St. Joseph's Development and feel that the proposal as outlined on pages 1 and 2 of this document, is a better fit on visual impact, available infrastructure, access to neighbourhood centres/amenities, access to Mallow town centre, access to schools, recreational services, etc.

### **Neighbourhood Centres**

**2.4.78 The provision of neighbourhood centres and local services and facilities is beneficial and desirable in reducing the need to travel to other areas and can result in the creation of a real sense of local place enabling the interaction of people and the provision of local services and facilities. The areas in which additional neighbourhood centres are likely to be needed are where the population is expanding or where there is an existing demand which is unmet.**

St. Joseph's Road and Aldworth Heights Residents have serious concerns about the lack of neighbourhood centres and thus have no real sense of place along with continuously experiencing a severe lack of local services and communities. Currently all existing residents suffer from a lack of neighbourhood centres and increasing housing stock and population in the area is further compounding the lack of facilities and services.

**2.4.79 There may be a need to provide a neighbourhood centre to serve lands in the upper part of the Spa Glen (North East) (within or adjoining the MW-R-03). In the longer term, a neighbourhood centre along St. Joseph's Road, to serve any future population associated with the MW-RR-01 site will need to be considered. For more detail on retail policy see Chapter 9 Town Centres and Retail.**

St. Joseph's Road and Aldworth Heights Residents are of the strong opinion that better roads infrastructure, street lighting, safe pedestrian walkways, cycle paths, public transport, neighbourhood centres, quality local services and supports are a prerequisite to all future housing development in the area.

### **Movement**

**2.4.81 The Mallow Traffic and Transportation Study prepared for the town in 2011 recommended the construction of several new roads to the north, east and west of the town, and new river crossings to the east and west, to connect new development areas to the N20, N72 and proposed N/M20 and to enhance accessibility within the town itself, as well as upgrading existing roads and junctions. Its recommendations also assumed the delivery of the N/M20 to the east of the town. The study needs to be updated and revised to take account of the requirements of Environmental, Flood Risk and Habitats Directive Assessment as well as the current context for Mallow set within the National Planning Framework and ROSES. It is a requirement of the ROSES that based on its designation as a Key Town a Local Transport Plan is prepared and this should be prioritised over the lifetime of the plan.**

St. Joseph's Road and Aldworth Heights Residents could not agree more with this policy and feel strongly that all related new roads be constructed and existing roads be upgraded before the development of additional housing on St. Joseph's Road. The relief road is a key cog in this policy wheel and the alternative location of the St. Joseph's Road development, together with the Mallow/Fermoy road realignment, as outlined on page 1 and 2 of this



document, is a perfect fit and a win-win for the people of Mallow to access/egress from the relief road.

**2.4.82 The N20 and the N72 national routes traverse and bisect the town causing congestion which adversely impacts on the amenity of the town, the capacity of the local 'internal' road network and the convenience and accessibility of local trips within the town to access shops and services. In the short-term the provision of a Relief Road is critical to take N72 traffic away from the centre of Mallow and continues to be a priority in the Government's Infrastructure and Capital Investment Plan 2016-2021. A corridor for the planned N72/N73 Mallow Relief Road has been selected to the north of the town and is included as objective MW-U-01 while Active Travel Corridor is also included as objective MW-U-04. An option selection exercise for the N/M20 motorway is also continuing in parallel.**

Here again, St. Joseph's Road and Aldworth Heights Residents could not agree more with this policy and feel strongly that all related new roads be constructed and existing roads be upgraded before the development of additional housing on St. Joseph's Road. The relief road is a key cog in this policy wheel and the alternative location of the St. Joseph's Road development, together with the Mallow/Fermoy road realignment, as outlined on page 1 and 2 of this document, is a perfect fit and a win-win for the people of Mallow to access/egress from the relief road.

**2.4.83 In terms of the wider built up area, general accessibility and connectivity for pedestrians and cyclists needs to be improved between residential areas and the town centre, transport services, employment areas, schools and other services to enhance opportunities, and provide convenient routes for walking and cycling on local journeys. Ongoing enhancement of the town centre to make it more people focused and permeable is needed. The previous Traffic and Transportation Study proposed a Cycle Friendly Zone in the town centre while the potential for new pedestrian amenity routes along the banks of the river Blackwater should also continue to be explored.**

St. Joseph's Road and Aldworth Heights Residents strongly feel that there is a severe lack of general accessibility and connectivity for pedestrians and cyclists in the St. Joseph's Road area. Improvements between St. Joseph's Road residential areas and the town centre are a must. Public transport services are an immediate requirement. Ease of access to schools and other services to enhance opportunities are critical. The provision of routes for walking and cycling on local journeys are also essential on St. Joseph's Road. St. Joseph's Road and Aldworth Heights Residents are of the strong opinion that better roads infrastructure, street lighting, safe pedestrian walkways, cycle paths, public transport, neighbourhood centres, quality local services and supports are a prerequisite to all future housing development in the area.

**2.4.85 As the town continues to develop and grow in line with population targets, there will be a need for the upgrading/ provision of new road and transport**

***infrastructure to serve both new and existing areas of the town. Any revised traffic and transportation plan must give detailed consideration to such infrastructural needs. As the population grows, consideration should also be given to the provision of a public bus service within the town and the design and layout of new development should consider the requirements of such a service.***

Here again, St. Joseph's Road and Aldworth Heights Residents could not agree more with this policy and feel strongly that all related new roads be constructed and existing roads be upgraded before the development of additional housing on St. Joseph's Road. The relief road is a key cog in this policy wheel and the alternative location of the St. Joseph's Road development, together with the Mallow/Fermoy road realignment, as outlined on page 1 and 2 of this document, is a perfect fit and a win-win for the people of Mallow to access/egress from the relief road.

***2.4.86 The National Transport Authority has recently approved funding for a range of projects through Project Ireland 2040 within the town. This includes interventions to enhance the Active Travel Network and the overall pedestrian and user experience by improving accessibility to key locations within the town such as the train station, the bus stop (public transport hub), the town centre/park as well as within and between local communities.***

St. Joseph's Road residents strongly feel that residential zones will not function or flourish in locations which totally lack community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, pedestrian and cycle paths, and lack of local public transport. All these services and amenities do not exist anywhere on St. Joseph's Road.

#### ***Water Management***

***2.4.90 Cork County Council will engage with Irish Water In relation to the provision of appropriate wastewater services to cater for the development required to achieve the target population for Mallow. However, intending Developers must satisfy themselves that Irish Water will make the necessary infrastructure available, and obtain a connection agreement from Irish Water for wastewater disposal and treatment.***

***2.4.91 The management of water quality within the Blackwater Catchment is an important issue. Surface water management is also important in terms of managing flood risk.***

St. Joseph's Road and Aldworth Heights Residents have concerns about the current/future provision of wastewater, surface water and the management of water quality in the area given the current location of the proposed St. Joseph's Road development and indeed, future housing developments in the St. Joseph's Road area.

#### **Further Local Concerns of St. Joseph's Road and Aldworth Heights Residents**

- The proposed development is contrary to the proper planning and sustainable development of the area.

- The entrance to Aldworth Heights onto St. Joseph's Road is already at full capacity, as it was designed only to serve traffic generated from the existing houses in Aldworth Heights. Adding extra vehicular movements at this junction with St. Joseph's Road, currently a very busy and heavily-trafficked route, which already serves high vehicular movement, from Fermoy, Mitchelstown and existing local high density housing estates, to and from Mallow Town, will create an unacceptable road traffic hazard and will significantly compromise public safety and reduce the carrying capacity of St. Joseph's Road, which is currently barely able to cope with localised traffic and lacks safe pedestrian and cycle routes. Indeed, St. Joseph's Road is currently well below acceptable and safe road specifications and standards for existing levels of vehicular traffic, cyclists and pedestrians.

### **Aldworth Heights Residents Issues and Concerns**

**As well as the comprehensive list of issues and concerns that St. Joseph's Road and Aldworth Heights Residents have detailed above, there are also a number of issues and concerns particular to Aldworth Heights residents.**

Aldworth Heights residents are aware of the probability that the main access road for the proposed St. Joseph's Road Development, may be Aldworth Heights private estate road.

The fact that the road leading to the gate to R15 and R16 is a Residential Cul de Sac and one of three such residential Cul de Sacs, of limited width, servicing the houses on these roads should be stated. Those roads could never be used as access roads or distributor roads for lands adjacent to the estate.

Aldworth Heights residents are also aware that all site services pertinent to the proposed St. Joseph's Road Development, may be connected into Aldworth Heights existing private services.

Aldworth Heights issues/concerns were presented to Mallow UDC in 2007, when the current proposed St. Joseph's Road Development was at a consultation stage hearing with Mallow UDC. Addendum 1 - Engineers report as attached to this consultation document, refers.

Key issues/concerns as detailed in the engineers report include:-

- The access road is constrained by established housing in the Castle Crest estate and houses on St. Joseph's Road. Condition 7 of the planning permission stipulated a road width of 6 metres for the access road to the estate be provided and required that 1.5 metre foot paths be installed. Due to constraints the site can only just accommodate this.
- The existing 6 metre road provides adequate access to the estate of 26 houses. It was not designed to act as a distributor road for any housing that may be developed on lands adjoining the estate (R-15 and R-16). Indeed

## **Bord Pleanála Case reference: JP04.320648**

Aldworth Heights Residents' earlier submission to Mallow UDC, clearly stated that, in the residents opinion the current road width is inadequate for their needs. This situation is exacerbated when visitors to the estate park on the street and at a pinch point on the first internal junction in the estate.

- The junction of Aldworth Estate's access road to St. Joseph's Road is narrow and has poor sight distances as a result of constraints from the earlier housing. The absence of a footpath on this side of St. Joseph's road at the junction further limits sight distances and provides a poor environment for pedestrians
- In the north east corner of Aldworth Estate there is a gateway which leads on to the lands zoned R-16 (at the turning 'hammer head' on the road). Ostensibly this provides access to those lands. From Aldworth Heights Residents' perspective, access rights are for agricultural use only. The existence of the gate does not in itself confer ubiquitous access rights to the lands.
- Regardless of this the road from the gateway leading onto Aldworth Heights is at its narrowest at this point where a small kink in the road tightens crossing distances. In the absence of a median strip between this road and the three houses facing it, it is difficult to envisage how an appropriate distributor road can be constructed at this location that can provide safe carriageway into the lands on R-16.
- The potential to seriously damage the residential amenity of the entire estate through use of the access road as a distributor road for adjacent lands would be contrary to the relevant sections in the Mallow SLAP and the Cork County Development Plan.
- Aldworth Heights Residents are of the firm opinion that the road within the estate of 26 detached homes is a private road within a cul-de-sac network and that all Aldworth Heights services are privately maintained services. This road is not suitable either as an access or distributor road for the lands adjacent to the estate. Indeed current vehicular access/egress through/to/from the estate is so tight that it is with continuous difficulty that vehicular traffic can pass each other. This ongoing problem is even more pronounced with big vehicles deliveries/collections. Note Map below, (road highlighted in yellow) :-





**Please refer to Addendum 1 - Engineer's report as submitted to Cork County Council - May 2007.**

This engineer's report as prepared for Aldworth Heights residents details the key points above and highlights further negative factors and offers solutions.

**Further issues of concern for Aldworth Heights Residents include:-**

- The Development as proposed will create an unacceptable traffic hazard, by changing the character of Aldworth Heights, from a cul-de-sac estate to a through road estate, thus materially interfering with the residential amenity of existing houses.
- The Development as proposed will create a further unacceptable traffic hazard, in Aldworth Heights, 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 proposed. Cognisance has to be taken of the likelihood of such houses, 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 Aldworth Heights, itself.

## Bord Pleanála Case reference: JP04.320648

- The site layout as proposed will lead to loss of privacy and residential amenity for the occupiers and owners of the houses, in Aldworth Heights, which back onto the site, through overlooking and noise nuisance.
- The proposed development will adversely alter the character of Aldworth Heights which is a mature estate of substantially identical detached two-storey houses. The proposal is for high density of both terraced and semi-detached houses, together with apartments, of modern design and appearance which, if permitted, will lead to an incongruous combination of architectural styles and thus contravene proper planning and development.

### Summary

St. Joseph's Road and Aldworth Heights Residents do not have an objection to the appropriate development of housing in the zoned residential lands adjacent to Aldworth Heights Estate on St Joseph`s Road in Mallow, Co. Cork. These lands were referred to in the Mallow SLAP (Apr 2007) as R15 & R16. In fact, Aldworth Heights residents have never had an objection to such and in the past have met with and have had correspondence with Council Officials and Public Representatives, and indeed produced an engineer's report to the Planning Policy Unit at Cork County Council, County Hall, Cork on May 11<sup>th</sup> 2007 outlining their legitimate concerns on these matters and in particular on the issue of access/egress through their estate into the zoned lands.

Having carefully reviewed Cork County Council's Cork County Development Plan 2022 and previous development plans St. Joseph's Road and Aldworth Heights Residents have serious concerns and issues, with the proposed development on St. Joseph's Road. In bullet point format such key issues include:-

1. Density in a site location that does not have the proper infrastructure to support. (Roads, safe pedestrian routes, cycle lanes, community amenities, neighbourhood centres, public transport etc.)
2. The proposed development location is in breach of the 10 minute rule as detailed in Cork County Council Development plan 2022 to 2028
3. The proposed development location will not meet the Place- Making and Sustainable Communities Model.
4. The proposed development location will not meet many of the principles of Placemaking.
5. The proposed development location will not meet many Placemaking Design Standards.

## Bord Pleanála Case reference: JP04.320648

6. Site contours, as described in this report are not conducive to cost effective house construction costs given the estimated additional minimum cost of 2m euro plus to bring houses to floor level and to install efficient site services.
7. Site contours, as described in this report will create a daily challenge for pedestrian access/egress to essential town services, (schools, shops, pharmacies, etc), given that it is 25 minutes walk to the town centre, egressing the estate with 100ft of ascent and egressing the town centre, on the return walk, with another 100ft ascent on St. Joseph's Road.
8. The proposed development will have a negative impact on the wider visual impact of the area counteracting Landscape 2.4.43 as detailed in the Cork County Council Development plan 2022 to 2028
9. The proposed development will not function or flourish in the proposed location which totally lacks community based services, community facilities and neighbourhood amenities, not to mind, inadequate roads, pedestrian and cycle paths, and local public transport. All these services and amenities, detailed as essential prerequisites in the Cork County Council Development plan 2022 to 2028, do not exist anywhere on St. Joseph's Road.
10. In line with 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, it is absolutely essential that all related new roads be constructed and existing roads be upgraded before the development of additional housing on St. Joseph's Road. The relief road is a key cog in this policy wheel and the alternative location of the St. Joseph's Road development, together with the Mallow/Fermoy road realignment, as outlined on page 1 and 2 of this document, is a perfect fit and a win-win for the people of Mallow to access/egress from the relief road.
11. Given 2.4.81 as detailed in the Cork County Council Development plan 2022 to 2028, the proposed development would endanger public safety by reason of traffic hazard, and would therefore be contrary to the proper planning and sustainable development of the area, due to the current unsafe standard of St. Joseph's Road.
12. The proposed current development location will result in a substandard form of development for future occupiers in terms of lack of local residential amenities, would give rise to a poor standard of development, and would seriously detract from the character and pattern of development in the area.
13. The proposed current development location, despite the land being zoned residential, would be overly car dependent, as the peripheral location, the lack of adequate, safe pedestrian and cycle linkages, and adequate bus connections within the outer area of the town, would leave all residents dependent on cars.
14. The proposed current 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."
15. The proposed current development location for the St. Joseph's Road Development is not in tune with the key areas of the **Design Manual for Quality Housing From**

## Bord Pleanála Case reference: JP04.320648

**Department of Housing, Local Government and Heritage** (See Addendum 3) The suggested alternative location for St. Joseph's Road Development which incorporates proposals on three options for Mallow/Fermoy Road Realignment, may currently be owned by O'Flynn & Co Developers. **(See red lined area in Land Registry map above).**

16. This suggested alternative location for St. Joseph's Road Development is directly opposite the Cork County Council Lr Ballyvinitter site, **(see yellow lined area at Spa Glen, Land Registry map above)**, currently at Planning Application Stage with Cork County Council. The **Blue Line** represents the proposed Mallow/Fermoy Road Realignment Option 1

### Proposed Alternative Location

The alternative proposal as outlined, on pages 3 to 6, of this submission is a better fit on visual impact, available infrastructure, access to neighbourhood centres/amenities, access to Mallow town centre, access to schools, recreational services, etc. And also provides three options for Mallow/Fermoy road realignment, eliminating current dangerous road junctions, safe and effective connectivity to the future new relief road, and providing a level site for relocation of the St. Joseph's Road proposed development, integrating with the Spa Glen development.

The proposed alternative location as detailed on pages 3 to 6, of the overall submission document to Cork County Council, is a far better fit to the principles of quality housing as set out in the **Design Manual for Quality Housing From Department of Housing, Local Government and Heritage** (See Addendum 3)

This alternative location would negate points 1 to 14 in the summary above, fit well with all policies in Cork County Council Development plan 2022 to 2028 and provide sustainable residential accommodation with easy access to all essential services and amenities, fulfilling the "10 minute" rule as required by Cork County Council Development plan 2022 to 2028.

The current Land Registry title status, as detailed on pages 4 and 5 of this submission, may also provide an immediate and clear cut opportunity to support the proposed alternative location as detailed in this submission.



**Addendum 1 - Engineers Report as submitted to Cork County Council - May 2007**

Planning Policy Unit  
Floor 13  
Cork County Council  
County Hall  
Cork

May 11<sup>th</sup> 2007

Dear Sir/ Madam

We Spatial Planning Solutions act on behalf of Aldworth Heights Residents Association<sup>1</sup> and wish to make a submission to the Mallow Special Local Area Plan (SLAP). We make reference to proposed changes to the draft plan concerning amendments to the X-03 Master Plan Area, (Reference MAL SLAP TC/CC 08.01).

The validity of this submission within the Special Local Area Plan process is based on the amendments set out in the document "*Proposed Amendment To The Mallow Special Local Area Plan*" (April 2007) concerning the specific zoning objectives of X-03, these are;

- (i) the addition of 30Ha of proposed Open Space around the Spa Glen; (ii) the deletion of a number of paragraphs associated with the construction, timing and nature of the proposed distributor road in the X-03 area, and;
- (iii) the deletion of a sentence concerning the "Upgrade of St. Joseph's Road". All

We would also like to draw attention to the Planning Authority of a previous submission by the Residents Association, dated January 10<sup>th</sup> 2007, concerning access difficulties to zoned lands within the Town Council Area (R-15 and R-16).

Our specific request in this submission is that due to inadequate capacity of roads provision in the Aldworth Estate and effective 'land locking' of zones R-15 and R-16 arising as a result of the zoning provisions and amendments to zone X-03, that the objectives of Zone X-03 should include either or both of the following;

- (A) That the lands encompassed in zones R-15 and R-16 are to be included into zone X-03 in order to allow integration of these lands into the overall master plan of this area.
- (B) That the following wording be included in the paragraphs associated with the requirement that "*The Master Plan include a detailed access strategy for the development as a whole. This to include the following;..*"

Proposed additional wording:

**"As part of the distributor road network provision should be made for appropriate vehicular, pedestrian and cycle access to existing residential zoned lands (R-15 and R-16)"**

<sup>1</sup> Aldworth Heights Residents Association C/O Mr. Kieran O'Connor, Chairman, 26 Aldworth Heights, Mallow.

**Rationale and Assessment**

The reasons why the above should be included into the final draft of the plan are set out below.

Aldworth Heights Estate:

This estate consists of 26 detached residences constructed in 1998 (PA Ref: 97/1966). It can be characterised as a 'back lands' development with sole access to the estate made at the junction on St. Joseph's Road and the estate forms a cul-de-sac with two internal roads servicing the houses.

This access road is constrained by established housing in the Castle Crest estate and houses on St. Joseph's Road. Condition 7 of the planning permission stipulated a road width of 6 metres for the access road to the estate be provided and required that 1.5 metre foot paths be installed. Due to constraints the site can only just accommodate this.

While it was considered that the 6 metre road would provide adequate access to the estate of 26 houses it was not designed to act as a distributor road for any housing that may be developed on lands adjoining the estate (R-15 and R-16). Indeed we note from their earlier submission, that in the residents opinion even the current road width is inadequate for their needs. This situation is exacerbated when visitors to the estate park on the street and at a pinch point on the first internal junction in the estate. (see photographs)

The junction of Aldworth Estate's access road to St. Joseph's Road is narrow and has poor sight distances as a result of constraints from the earlier housing. The absence of a footpath on this side of St. Joseph's road at the junction further limits sight distances and provides a poor environment for pedestrians. (see photographs)

On the north east corner of Aldworth Estate there is a gateway which leads on to the lands zoned R-16 (at the turning 'hammer head' on the road). Ostensibly this provides access to those lands, however the exact nature of access rights through this gateway is not known to us. The existence of the gate does not in itself confer ubiquitous access rights to the lands. We have not yet been able to establish whether access rights only relate to the agricultural use of the lands, or indeed whether any rights of way exist at all. Regardless of this the road from the gateway leading onto Aldworth Heights is at its narrowest at this point where a small kink in the road tightens crossing distances (see photographs). In the absence of a median strip between this road and the three houses facing it, it is difficult to envisage how an appropriate distributor road can be constructed at this location that can provide safe carriageway into the lands on R-16.

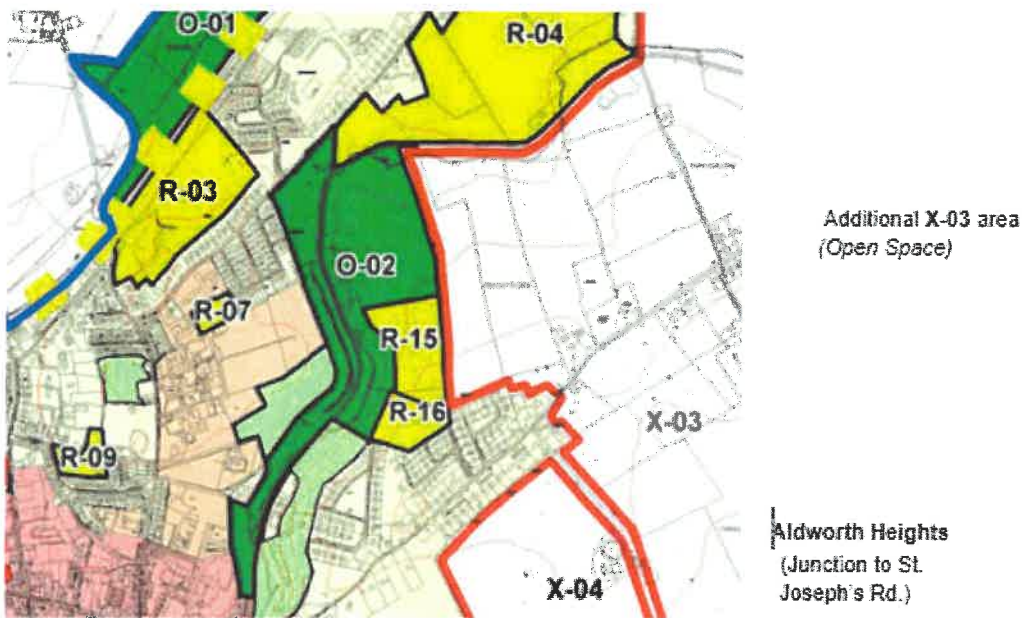
Furthermore the potential to seriously damage the residential amenity of the entire estate through use of the access road as a distributor road for adjacent lands would be contrary to the relevant sections in the Mallow SLAP and the Cork County Development Plan.

Given the nature of the road capacity at this point and on the remaining section of the access road for Aldworth Heights estate we cannot see how any safe access, other than a high quality pedestrian route, can be facilitated through Aldworth Heights estate. Needless to say, were pedestrian access made at this point it's design would require overlooking and high quality landscaping to ensure surveillance and appropriate use.

Zones R-15 and R-16

These zones were originally established in the 2004 Mallow town plan (TOC-05 & TOC 06). R-15 is 3.84 Ha. and R-16 is 1.90 Ha. In the draft Mallow SLAP they are both zoned for low density residential development. Both zones are entirely surrounded by either established development, lands zoned 'Open Space (O-02) or the lands zoned X 03 (see fig 1.). The inclusion of the additional lands to X-03 as per the draft plan amendments completes the 'land locking' of these zones.

**Figure 1.** Extract from Draft Mallow SLAP indicating amendments to Zone X-03 and illustrating 'land locked' nature of residential zones R-15 and R-16, unless access through zone X-03 is achieved.



Access to the lands has been a problem since the development of lands at Aldworth Heights and the Castle Grove estate (to the south west). A planning application on lands principally in R-15 for outline permission of 102 no. dwellings was granted to D. McAuliffe in June 2001 (PA Ref. 01/2175) and this was approved for full planning permission in November 2001 (PA Ref. 01/2315). This was not subsequently developed; we understand this was due to difficulties in its proposed access to the Castle Grove estate.

Lands on R-15 were subsequently sold to Mallow Town Council <sup>2</sup>, these are currently the subject of intended residential development by Mallow Town Council. No notice has been made by Mallow Town Council as per Part 8 of the Planning and Development Regulations 2001, and plans for this proposal have not yet been made public. As such any intentions of Mallow Town Council cannot, at this point be considered as an active 'part 8' development proposal and is presumably in abeyance.

It is perhaps appropriate that this is so, as any proposal to develop lands on R-15 and R-16 would be premature until adoption of the Mallow Slap and approval of the master plan required in the objectives of zone X-03 is achieved. Lands on zones R-15 and R-16 form an integral part of the entire area. They can provide linkages to the proposed open spaces at O-02 and within X-03 itself for the estates at Aldworth Heights, Castle Grove, and the large development at Castlepark. Integration with X-03 is clearly necessary, not only for vehicular access but also to allow pedestrian and cycle access to objectives in X-03 regarding neighbourhood centre and other community facilities. Forcing additional traffic through the Aldworth Heights estate and to spill out on the junction at St. Joseph's road is clearly not in the best interest of not only the residents of Aldworth Heights but of also potential residents housed in R-15 & R-16.

### **Conclusion**

In this submission we have demonstrated how access to zones R-15 and R-16 are restrained by road capacity and existing development on St. Joseph's road. As the additional land included in the zone X-03 seeks to provide for recreational and open space uses, options for road access to zones R-15 and R-16 becomes further limited. We propose a solution to this through the inclusion of one or both of the following inclusions into the Mallow Slap.

- (A) That the lands encompassed in zones R-15 and R-16 are to be included into zone X-03 in order to allow integration of these lands into the overall master plan of this area.
- (B) That the following wording be included in the paragraphs following the requirement that *"The Master Plan include a detailed access strategy for the development as a whole. This to include the following; ."*

***Proposed additional wording to zone X-03 objectives:***

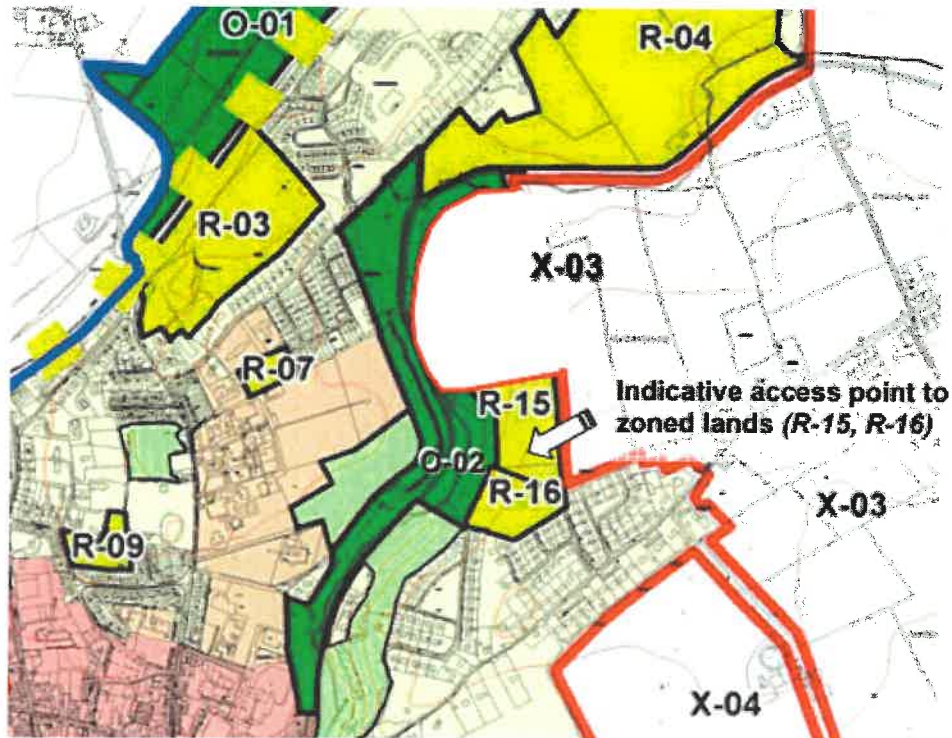
**"As part of the distributor road network provision should be made for appropriate vehicular, pedestrian and cycle access to existing residential zoned lands (R-15 and R-16)."**

Associated with the wording of (B) into the relevant section the following zone map of the Mallow SLAP will illustrate this objective;

<sup>2</sup> Possibly some on Z-16 are also under the control of the Local Authority; we have not been able to establish the exact landholding.



**Figure 2.** Modified extract from Draft Mallow SLAP showing indicative access point to zoned lands R-15 and R-16.



We believe that inclusion of these into the Mallow SLAP will allay justified fears of Aldworth Heights residents and ensure lands in R-15 and R-16 can be fully integrated in the general development strategy for the entire area. On this basis we urge Mallow Town Council and Cork County Council to include our proposals.

Yours faithfully

David Moore  
Spatial Planning Solutions

**Photographs:**

***Photograph 1. Aldworth Heights Entrance – limited sight distances due to constraints***



***Photograph 2. St. Joseph's Road from Aldworth Heights Entrance looking toward Town Centre – absence of footpath limits sight distance and creates unsafe pedestrian environment.***



**Bord Pleanála Case reference: JP04.320648**

**Photograph 3.** *St. Joseph's Road from Aldworth Heights Entrance looking east on Castle Crest – absence of foot path limits sight distance and creates unsafe pedestrian environment.*



**Photograph 4.** *A kink in the access road in Aldworth Heights causes a pinch point at the first internal junction in the estate. Note the limited distance between front gardens of Aldworth Heights houses and the boundary (hedgerow) of neighbouring estate .*







**Photograph 5.** Gates at the turning 'hammer head' on the north east corner of Aldworth Heights leading to zone R-16.





*Photograph 6. Zone R-16 with Castle Grove Estate in the left background.*



*Photograph 7. Zones R-16 (foreground) and R-15 as land slope toward the Spa Glen.*



## **Addendum 2 - Three Bord Pleanála case examples on decision to refuse and the associated grounds for refusal.**

*(Note: Extracts from Bord Pleanála ( In Italics))*

(Note: St. Joseph's Road Residents' responses are in normal font.)

### **Case 1**

***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 total site area was to cover 6.77 hectares and located to the west of the Laurel and Carrigmahon Hill. Planning consultants McCuthcheon Halley, tasked with providing the overall strategy for the proposal, had stated that the proposed development “will promote compact growth in a location contiguous to the existing urban footprint where it can be served by public transport and walking”.***

***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.***

***However, concerns were raised by local residents and councillors over the access to the site and the lack of road infrastructure in place to cope with the new demand that would be created. Moreover, while the application was subject to policy objectives within the Cork County Development Plan 2014-2020, a new zoning category has been placed on the site under the recently adopted and enforced 2022-2028 Development Plan, which would not permit such development from taking place.***

***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”. The Inspector later went on to say the “bollard-controlled pedestrian and cycle access on the northern boundary of the site would be onto Laurel Hill, a local road (L2481) of substandard condition to safely facilitate pedestrians and cyclist movements”***

***The Board agreed with the opinion of the Inspector, while also noting that 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 St. Joseph's Road development falls into a similar vein to the development in Case 1. Key similarities include:-

## **Bord Pleanála Case reference: JP04.320648**

- 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**

***A PROPOSAL to construct 38 houses at Carrowbaun, Westport, has been rejected by An Bord Pleanála.***

***Developer Brendan Byrne & Son Ltd. received a grant of permission for the homes from Mayo County Council but that decision has been overturned following an appeal to An Bord Pleanála.***

***The appeal outlined support for the development of the site subject to the preparation of a suitable design and appropriate information.***

***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 St. Joseph's Road development 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.

## **Bord Pleanála Case reference: JP04.320648**

### **Case 3**

***An Bord Pleanála has refused approval for a social housing on the Headford Road.***

***The city council sought approval for a social housing apartment complex, and some houses on a site in Ballinfoyle. The plans were for a three storey apartment building, with rooftop solar panels, and three further houses.***

***The apartment building was to contain a total of 21 units, with three one-bedroom apartments, 14 two-bedroom units, and 4 three-bedroom units.***

***Each of the houses was to be a two storey building, with four bedrooms apiece.***

***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 St. Joseph's Road development falls into a similar vein to the development in Case 2. Key similarities include:-

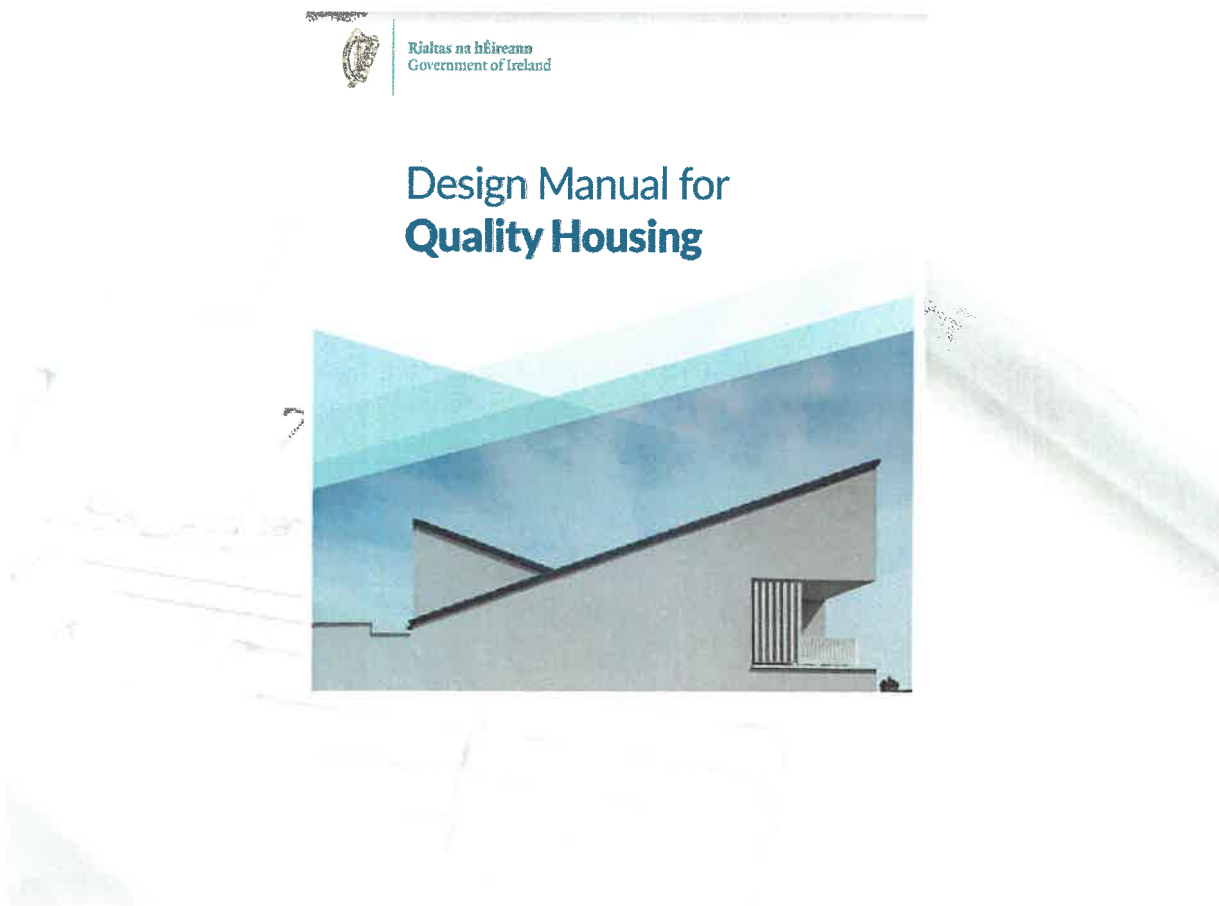
- despite the land being zoned residential, as it would be overly car dependent.
- “peripheral location, the lack of adequate, safe pedestrian and cycle linkages, and adequate bus connections within the built up area of the city,” would leave residents dependent on cars.
- the lack of alternative travel 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.”

The three cases of refusal by Bord Pleanála illustrate strong parallels to issues for St. Joseph's Road residents to lodge an appeal to Bord Pleanála to the proposed St. Joseph's Road development.



**Addendum 3 - Extracts from Design Manual for Quality Housing  
From Department of Housing, Local Government and Heritage**

**Published on 21 January 2022 and last updated on 21 January 2022**



**The following extracts have been copied from in support of:-**

**St. Joseph's Road and Aldworth Heights Residents' Design Stage  
Consultation Document Submission to Cork County Council.**

### **1.1.1 Proximity to Facilities/Amenities**

In addition to having an appropriate zoning for residential development, the site should be located close to as wide a range of facilities as possible, with the general minimum proximity to a school, shop and means of public transport.<sup>4</sup> It is normally accepted that a ten-minute walk's distance, or about one kilometre, is the standard for what is considered proximate.<sup>5</sup> Out-of-sequence development at a remove from the existing town or village built fabric, so called 'leapfrogging', is not consistent with planning policy<sup>6</sup> and should be avoided.

From these requirements, it can be seen that peripheral locations are not generally supported, as their development is inconsistent with planning guidance and can place an unreasonable burden on residents who may not have access to private transport. Consistent with the *Project Ireland 2040 - National Planning Framework* (NPF), town centres, brownfield sites and other locations with easy access to facilities are favoured.

When considering the development of social housing in a small town or village, in addition to need, the local authority should be mindful of the extent to which facilities are available for tenants who may not have access to private transport. This is an even more important consideration in respect of housing for older people<sup>7</sup>, who need easy access to a wide range of facilities.

### **1.2.1 Serviced**

The site should have all service connections immediately available to it. It is recognised that from time to time an otherwise acceptably located site may need to rely, at least initially, on an on-site waste water treatment plant, and this will not in itself invalidate social housing development on such a site. Apart from environmental and planning policy, QHfSC does note that before deciding on the location of social housing, careful consideration should be given to both the cost and the practicality of providing sewage and water supply. Normally, any proposal to develop such an unserviced location would need to be specifically justified, by way, for instance, of a very high need for social housing in the locality.

### **1.2.2 Topography**

The site should preferably be relatively flat or have slopes which will allow development without the need for extensive earthworks or substantial retaining walls. Favourable considerations such as an excellent location, proximity to a wide range of facilities and services, existence of a large housing need and consistency with planning policy may on occasions justify the additional construction costs and override the general presumption against development of such sites.



*Topography - Too great a slope for easy development.*

Where appropriate to develop, opportunities for both innovative design and the use of design strategies for dealing with level differences should be explored to minimise the need for expensive large retaining structures. This is considered more fully in Section 3.6.9 below. Sites with very poor soil-bearing capacity should also ordinarily not be prioritised for development, unless such favourable considerations exist.

#### **1.2.4 Other Factors**

Other factors to be considered in assessing site suitability include site contamination; existing services that would need to be relocated, in particular on brownfield sites; the presence of invasive species; and the bearing capacity of the soil, as previously noted. A full due diligence needs to be carried out on all sites prior to purchase, and at the very least a detailed walk-through inspection needs to be made, which may well trigger further and more in-depth investigations. Again, this is not to say that such factors would prohibit purchase of a particular site, especially where the site is otherwise favourably located, but an outline of the additional costs necessary to overcome such shortcomings should be established and factored in when determining what is a reasonable price for the lands. This may also help decide between alternative sites that have in other respects been assessed as relatively equal in terms of their suitability.

**2.1.3** When considering the purchase of a site to meet a social housing need, local authorities should generally ensure that the site is in a small area on the Pobal Deprivation Index Map with a minimum rating of *'marginally below average'*, though if other factors are favourable (e.g., if the site is immediately adjacent to an *'affluent'* rated area) or for very small developments, (up to 9 dwellings, say) a minimum rating of *'disadvantaged'* may from time to time be acceptable, in particular when it can be demonstrated that a high level of estate management will be provided.

### **3.2 Sustainability**

**3.2.1** Sustainability has three components: environmental, economic and social. Among the improvements afforded by sustainable development in each of these components are the following:

#### **3.2.2 Environmental**

## **Bord Pleanála Case reference: JP04.320648**

All of the following aspects will result in reduced carbon emissions by reducing the need for and use of private transport:

More compact settlement makes public transport more commercially viable .

More compact settlement also means that more facilities become viable within walking distance

Improved permeability provides easier access to more facilities within walking distance.

The quality of the public realm is improved when the perception of improved safety makes walking and cycling more attractive

### **3.2.3 Economic**

More compact settlement makes more local business viable.

Improved permeability generates increased footfall, which boosts local business.

More compact settlement reduces land grab and keeps more land in agricultural use, reducing the need for imports.

Mixed house types facilitate older people to live longer within their communities, thereby reducing the need for full time care.

### **3.2.4 Social**

Mixed tenure facilitates integration, and the resulting lack of social isolation provides better educational and employment opportunities for all income groups.<sup>7</sup>

### **Sustainable Communities**

The concept of sustainable communities was formulated by applying the principles of sustainable development to residential development and settlements.

The EU's Bristol Accord on Sustainable Communities in Europe was agreed in 2005. In Ireland, this was adopted in the policy document *Delivering Homes, Sustaining Communities* (2007). *Delivering Homes* identified that the physical environment for sustainable communities would be delivered in sustainable neighbourhoods. It went on to identify some key features and advantages of sustainable neighbourhoods:

*NESC set out a clear definition of sustainable, integrated neighbourhoods, which are much less car-dependent and more easily served by effective public transport. This pattern of development is essential to underpin the longer-term success of the substantial investment in public transport under Transport 21.*

*Sustainable neighbourhoods are areas where an efficient use of land, high quality urban design and effective integration in the provision of physical and social infrastructure such as public transport, schools, amenities and other facilities combine to create places people want to live in.*



*Additional features of sustainable neighbourhoods include:*

compact, energy efficient and high quality urban development;

accessibility via public transport networks and also meeting the needs of the pedestrian and cyclist; and

provision of a good range of amenities and services within easy and safe walking distance of homes.

*The development plan process is a key instrument in putting the policies in place to create sustainable neighbourhoods.*

**3.3.3** The qualities of the built environment that promote sustainable communities, including the placemaking principles of urban design, are considered in more detail below. This allows a checklist to be developed at the end of this chapter, against which the quality of a development can be assessed.

### **Key Points Summary from these extracts include:**

- In addition to having an appropriate zoning for residential development, the **site should be located close to as wide a range of facilities as possible, with the general minimum proximity to a school, shop and means of public transport.**<sup>4</sup>
- It is normally accepted that **a ten-minute walk's distance, or about one kilometre, is the standard for what is considered proximate.**
- **Out-of-sequence development** at a remove from the existing town or village built fabric, so called 'leapfrogging', is not consistent with planning policy<sup>6</sup> and should be avoided.
- **Peripheral locations are not generally supported**, as their development is inconsistent with planning guidance and can **place an unreasonable burden on residents who may not have access to private transport.** Consistent with the *Project Ireland 2040 - National Planning Framework (NPF)*, town centres, **brownfield sites and other locations with easy access to facilities are favoured.**
- Local authorities should be mindful of the **extent to which facilities are available for tenants who may not have access to private transport.**
- QHfSC does note that before deciding on the location of social housing, **careful consideration should be given to both the cost and the practicality of providing sewage and water supply.**

## Bord Pleanála Case reference: JP04.320648

- The site should preferably be relatively flat or have slopes which will allow development without the need for extensive earthworks or substantial retaining walls.



*Topography - Too great a slope for easy development.*

- When considering the purchase of a site to meet a social housing need, local authorities should **generally ensure that the site is in a small area on the Pobal Deprivation Index Map with a minimum rating of 'marginally below average'**, though if other factors are favourable (e.g., if the site is immediately adjacent to an 'affluent' rated area) or for very small developments, (up to 9 dwellings, say) a minimum rating of 'disadvantaged' may from time to time be acceptable, in particular when it can be demonstrated that a high level of estate management will be provided.

### 3.2.2 Environmental

All of the following aspects will result in reduced carbon emissions by reducing the need for and use of private transport:

- **More compact settlement makes public transport more commercially viable .**
- **More compact settlement also means that more facilities become viable within walking distance**
- **Improved permeability provides easier access to more facilities within walking distance.**
- **The quality of the public realm is improved when the perception of improved safety makes walking and cycling more attractive**

### 3.2.4 Social

Mixed tenure facilitates integration, and **the resulting lack of social isolation** provides better educational and employment opportunities for all income groups.<sup>7</sup>

### **Sustainable Communities**

The concept of sustainable communities was formulated by applying the **principles of sustainable development to residential development and settlements.**

The EU's Bristol Accord on Sustainable Communities in Europe was agreed in 2005. In Ireland, this was adopted in the policy document Delivering Homes, Sustaining Communities (2007). Delivering Homes **identified that the physical environment for sustainable communities would be delivered in sustainable neighbourhoods. It went on to identify some key features and advantages of sustainable neighbourhoods:**

NESC set out a clear definition of **sustainable, integrated neighbourhoods, which are much less car-dependent and more easily served by effective public transport.** This pattern of development is essential to underpin the longer-term success of the substantial investment in public transport under Transport 21.

**Sustainable neighbourhoods are areas where an efficient use of land, high quality urban design and effective integration in the provision of physical and social infrastructure such as public transport, schools, amenities and other facilities combine to create places people want to live in.**

**Additional features of sustainable neighbourhoods include:**

- compact, energy efficient and high quality urban development;
- **accessibility via public transport networks and also meeting the needs of the pedestrian and cyclist; and provision of a good range of amenities and services within easy and safe walking distance of homes.**

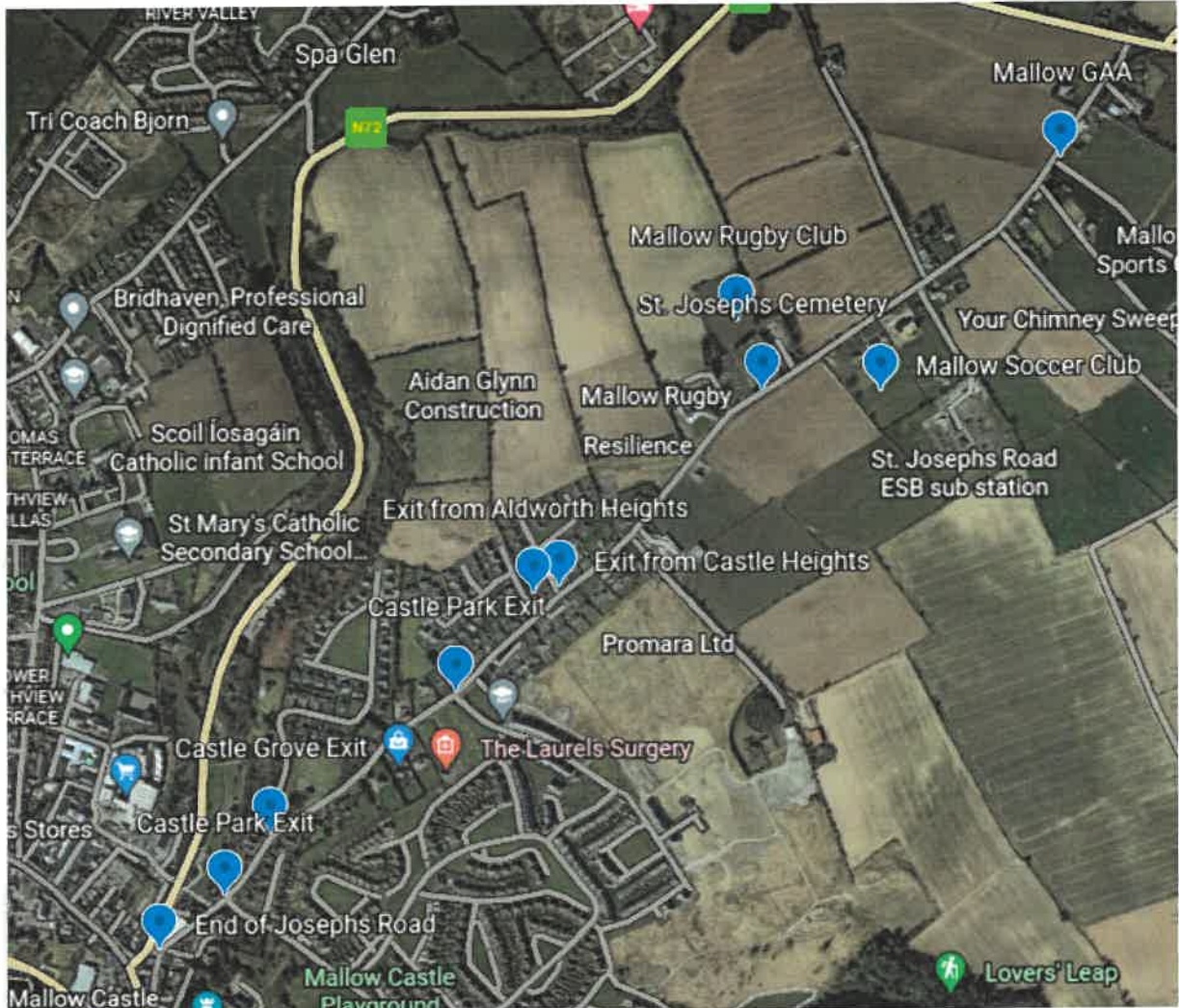
### **Closing Comment from St. Joseph's Road and Aldworth Heights Residents**

The current proposed location for the St. Joseph's Road Development is not in tune with the key areas of the **Design Manual for Quality Housing From Department of Housing, Local Government and Heritage**, as detailed above.

The proposed alternative location as detailed on pages 2 and 3, of the overall submission document to Cork County Council, is a far better fit to the principles of quality housing as set out in the **Design Manual for Quality Housing From Department of Housing, Local Government and Heritage**

### **Addendum 4 - St. Joseph's Road Concerns**

St. Joseph's Road and Aldworth Heights Residents have very strong concerns on the current standard of St. Joseph's Road and its existing vehicular traffic density. St. Joseph's Road and Aldworth Heights Residents Residents feel that St. Joseph's Road has reached its peak capacity and is not suitable for further high density housing developments and its associated increase in traffic volumes.



- Google Earth Shot shows aerial view of St. Joseph's Road and existing volumes of housing densities which includes Castle Park, Castle Grove, Aldworth Heights, Castle Heights and road frontage detached dwellings. Blue markers indicate feeder exits from estates, and the near cul-de-sac end to St. Joseph's Road, on the town side.

Google Earth Shot also has blue marker indicators for the local Cemetery, Rugby, Soccer and GAA Clubs. Indeed the next stage of development in Castlepark is planned for the northern section of the land comprising approx. 19.29 hectares (47.68 acres) is zoned residential. It has potential for residential development and a continuation of the Castlepark residential scheme subject to planning permission. An indicative development layout prepared by O'Keeffe O'Connell Architects indicates



## Bord Pleanála Case reference: JP04.320648

potential for 310 houses to include a mix of 3 bed semi-detached, 4 bed semi-detached, 4 bed detached and 4 bed town houses.

(Source: <https://lisney.com/property/land-at-castlepark-mallow-co-cork/> )

- This clearly indicates that current traffic volumes from these houses is above capacity for St. Joseph's Road, and this capacity is at breaking point with the additional vehicular traffic using the road travelling to and from Fermoy/Mitchelstown and beyond. Such vehicular traffic includes Light Weight/HGV/Articulated traffic. Further traffic congestion is dominant with funerals and when GAA, soccer and rugby matches are played at the three club venues on the eastern end of St. Joseph's Road. The pending Castlepark development will also add further and unmanageable vehicular capacity to St. Joseph's Road.
- The town end of St. Joseph's Road runs into a near cul-de-sac of a narrow laneway road for traffic heading to the bridge and a T-Junction for traffic heading to the town centre. This results in high traffic congestion at peak and off peak times.
- 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, unsafe for pedestrian use, lacks proper street lighting, and is not suitable for additional road traffic which would result from further housing development on the road.
- 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 cyclists and pedestrians. The road also requires proper street lighting.

**Addendum 5 - Historical Communications and Submissions by  
Aldworth Heights Residents (2007)**

**For Attention of Mr Maurice Manning,**  
Heights,  
Director of Housing,  
Cork County Council Planning Dept.,  
County Hall,  
Carrigrohane Rd.,  
Cork

14, Aldworth

St. Josephs Road,  
Mallow,  
Co. Cork.

planninginfo@corkcoco.ie

25<sup>th</sup> October 2017

Dear Mr Manning,

I am writing to you on behalf of Aldworth Heights Residents Association in connection with Cork County Councils plans for the development of lands adjacent to our housing estate on St Josephs Road, Mallow, namely in lands zoned R-15, and R-16 and also lands known as Keatley's Close and Carrigoon Beg zoned X-03 in the County Development Plan 2017.

At the outset I can say that there is not an objection from our Association to the development of these lands for the construction of new homes if done in an inclusive and cooperative manner, where the observations and concerns of existing neighbourhoods are taken into account.

I am aware that the planning process includes such observations but I would like to bring to your attention at this early stage a submission our association brought forward to Mallow Town Council in previous rounds of the planning for the lands concerned, and I attach a copy herewith which I would ask you to consider in any new planning proposals.

In addition at a recent meeting of our association committee the following items were brought forward for communication to you so that you may be able to take account of them also:-

1. That the density of any new development will be in line with existing housing in the area.
2. That housing will not be two storeys at the elevated section of the lands, but rather they be bungalows or dormers.
3. That the existing entrance to Aldworth Heights Estate will not be included as the entrance to any new developments in lands adjacent because it is not suitable to service any additional housing, and that any such entrance will be via a greenfield site, as per our submission by Spatial Planning Solutions of May 2007.
4. St Josephs Road, which feeds into the Spa area in Mallow town does not have the proper infrastructure to cater for increased traffic generated from the development of additional housing estates in the vicinity. In the last 10 years the new Mallow GAA complex and a new primary school in Castlepark due to open soon, both on St Joseph's Rd., only add to congestion in the area. The current development plan for the area should also influence planners in designing access/egress to the proposed development from the main N72 Mallow / Fermoy road. This is now even more feasible, given the announcement of the green light for M20.

**Bord Pleanála Case reference: JP04.320648**

I would respectfully ask that you give this matter your attention and I look forward to hearing from you in due course in this matter.

Yours sincerely,

David Lonergan, Chairman, Aldworth Hts Residents Assoc.,

14. Aldworth Heights,  
St Josephs Road,  
Mallow,  
Co Cork.

On Thu, Nov 2, 2017 at 10:06 AM, Maurice Manning <Maurice.Manning@corkcoco.ie> wrote:

Dear Mr Lonergan,

I refer to your recent correspondence with regard to the above development and have noted the issues you raise. While Cork County Council has not as yet commenced designing the proposed scheme it is hoped that the design process will begin in the coming weeks. Your comments are timely in that regard. Once a scheme is fully developed it will be advertised for comment in accordance with Part 8 of the Planning & Development Regulations 2001.

In relation to density and design, the proposal will be prepared in line with the requirements of the Mallow Town Development Plan, Cork County Development Plan and Planning Guidelines.

Your comments on the access into the land, the use of Aldworth Heights and the matter of traffic and use of St. Josephs Road are issues that will need to be addressed at the design stage.

I look forward to your further observations once the detailed design is complete and the Part 8 Planning process for the scheme is advertised.

Yours Sincerely,

**Maurice Manning**  
**S/Director of Service**  
**Housing**  
**Cork County Council**  
**021/4285544**  
**Email maurice.manning@corkcoco.ie.**

**Designated Public Official under the Regulation of Lobbying Act, 2015**

**Bord Pleanála Case reference: JP04.320648**

----- Forwarded message -----

From: **dave lonergan** <davelon55@gmail.com>

Date: Thu, Nov 2, 2017 at 11:56 AM

Subject: Re: Proposal for the Development of lands along St. Josephs Road, Mallow, Co. Cork

To: Maurice Manning <Maurice.Manning@corkcoco.ie>

Dear Mr Manning,

I would like to thank you for your prompt reply.

I note your comments regarding the process and will await further developments following on from the design stage.

Yours sincerely,

David Lonergan.





# *Aldworth Heights Residents Association*

Planning Policy Unit,  
Floor 13,  
Cork Co. Council,  
County Hall,  
CORK.

Mr. Kieran O'Connor,  
Chairperson,  
Aldworth Heights Residents Assoc.,  
26 Aldworth Heights,  
St. Joseph's Road,  
Mallow.

10<sup>th</sup> January 2007

**Re: Submission to Special Local Area Plan for Mallow Town.**

Dear Sir/Madam,


The following is a submission to the Special Local Area Plan on behalf of the residents of Aldworth Heights. This submission wishes to make specific reference to the proposed development of land – reference numbers R-15 and R-16 at St. Joseph's Road, Mallow.

Our submission seeks to address the following points:-

- Access through Aldworth Heights as proposed.
- Current traffic volume – (traffic study attached)
- Alternative access to proposed site
- Safety issues arising from proposed development
- Compatibility with Special Local Area Plan

We the residents wish to state quite clearly, that while we have no objection to the development itself, we feel very strongly that the only access/entrance which should be considered to this proposed development is from the N.72 (Spa Road).

Yours faithfully,

  
Kieran O'Connor,  
Chairperson.

**1. Introduction:**

Aldworth Heights estate consists of 26 houses, essentially developed along 2 cul-de-sacs aligned in a west-east-west orientation. The traffic from these two internal roads merge at a T junction, marked as junction 'B' on the enclosed map, and located approximately 60m from the main exit onto St. Joseph's Road (U5) - this exit junction is marked as junction 'A' on enclosed map. The proposed development will see one of these cul-de-sacs opened at its western end, allowing the resultant traffic to pass directly through what is currently a closed area. This submission outlines the primary reasons as to why the existing residents of Aldworth Heights find this totally unacceptable and offers a clear and superior access route that runs directly to the proposed development site.

There exists a very large residential development landbank to the north east of Aldworth Heights estate. The proposed development is essentially the first phase of a proposed strategic development plan for the St. Joseph's Road area for the construction of 2,500 new houses, stretching as far as Oliver's Cross. Arising from local concerns regarding the development, the residents of Aldworth Heights have sought and have not been provided with details of the proposed development by the Town Council. Details outlined in the local media, suggest that current housing density levels would result in approx. 105 housing units on the completed site. The residents of Aldworth Heights have consistently stated that they have no objection to the development of housing in the surrounding land, and clearly acknowledge that development is necessary and inevitable. However, we strenuously object to this type of piecemeal development, without the proper provision of adequate infrastructure. This type of development must comply with the ordered development of Mallow town's Special Local Area Plan (SLAP). Housing development in the area is welcome but, it must be planned strategically.

**2. Traffic: Access onto St. Joseph's Road (U5) - Junction A**

In recent years, traffic on the U5 road has become exceptionally heavy, due to the significant development at Castlelands which is ongoing at present and also the increased use of St. Joseph's road as a shortcut to the Dublin - Fermoy road (N72). Current traffic flow has been measured by Aldworth Heights residents as illustrated in the attached table. As a direct consequence of this increase, is the present difficulty in exiting Aldworth Heights - via junction marked A. Please refer to *photographs nos. 1 to 4* as attached. The poor design of this junction, poses great difficulty due to very limited visibility and also the fact that it cannot accommodate 2 vehicles wishing to access or egress Aldworth Heights at the same time. Visibility can also be hindered by on street parking on St. Joseph's Road.

If the proposal is that the development is allowed access to St. Joseph's Road via entrance to Aldworth Heights, then the impact of the extra traffic generated from the 130 houses will be the deterioration of the quality of life of the existing residents and offers a poor service to the people who will eventually reside in the proposed development to the west of the estate.

In representations to local Councillors, local residents raised serious concerns in relation to the large increase in through traffic in their estate, if the development was granted planning permission. Should this development proceed without the required infrastructure then St. Joseph's Road will become a major bottleneck for Mallow town.

As documented in our traffic study which was conducted over a 12 hour period from 7am to 7pm, 1935 vehicles passed the entrance to Aldworth Heights with 211 of these vehicles entering/leaving the estate itself. One must begin to recognise the folly of allowing additional residential traffic to use this entrance/exit. This is particularly true in this instance where the option of a superior alternative exists.

### **3. Traffic: Alternative access to proposed site (Sites indicated as R15 & R16)**

Perhaps the greatest source of frustration to existing residents is that there is a clear alternative access road running directly beside the proposed development site. This road is shown on the enclosed map i.e. N.72. The option of exiting the development onto the Spa Road (N.72) would allow for the design of a large splayed junction with properly designed sight lines and have the capacity to cater for the traffic volume generated from the proposed development. There are no residences fronting this roadway and therefore, there is no on street parking problem.

It is our understanding that the intention is to access the development site via the existing entrance to the Aldworth Heights estate. This will entail the opening of a cul-de-sac which has been present since the initial phase of the estate began approximately nine years ago. This is against the wishes of both local public representatives and the residents.

Residents bought their properties on the understanding that they were purchasing in a cul-de-sac development. If access is to be permitted through Aldworth Heights estate, the result will be ever increasing volumes of two-way traffic using what is now a quiet cul-de-sac road. This road is approx. 6m wide which is the absolute minimum width as defined in the Dept. of Environment's *Recommendations for Site Development Works for Housing*. However, this road width is insufficient for a through road when one factors in the significant on street parking that already exists on this estate road. It should also be noted that Dept. of Environment *Recommendations for Site Development Works for Housing*, clearly states that all road layouts should be designed to deter through traffic. Opening an existing cul-de-sac in a housing estate to accommodate access to a new development, clearly contravenes these guidelines.

Allowing traffic to exit Aldworth Heights from this development, is a quick-fix solution to the present situation. It both encourages and facilitates the piecemeal development of the landbank to the north-east of the estate. It is not difficult to envisage the development of other lands which border sites R-15 and R-16 at a future date, giving rise to further concerns regarding potential access through Aldworth Heights.

**4. Traffic: Internal 'T' Junction - (Junction 'B' as indicated)**

All traffic entering and exiting the estate, must merge at a 'T' junction approx. 60m from the St. Joseph's Road entrance. This junction is now relatively safe as only three houses (nos. 11, 12 & 13) are built along the west-east-west aspect of the estate entrance which leads directly to proposed development. Should this road become a through road, this junction will become increasingly more dangerous, due to reduced clear sight angles, leading from the main body of the estate.

– See photographs nos. 5, 6, 7 & 8.

As proposed new roadway will become the main thoroughfare, residents, particularly those residing in house nos. 11, 12 and 13, have justifiable fears for the safety of their children.

It is not possible to realign this junction as the existing housing scheme dictates its present eccentric layout. (Photos nos. 5, 6, 7 & 8 also refer). Motorists driving through a housing estate, tend to travel at greater speeds than motorists resident within the estate, and this will inevitably result in potential increase in accidents at junction 'B'.

**5. Child Safety**

Present traffic is slow moving through Aldworth Heights estate, as there is no through road. This situation will change dramatically with the removal of the cul-de-sac, and ensuing increase in traffic volume. This of course gives rise to major concerns regarding safety of children on the estate. This concern is amplified by the fact that this road will carry all construction traffic during the building phase of the development. The dramatic change in traffic climate and the danger to children living and playing in the estate, must be acknowledged. To date child safety is encouraged by residents living within the estate taking greater care while driving through their own estate and secondly, traffic volumes are low due to the fact that the road terminates in a cul-de-sac. As stated previously, neither of these points will be valid, if the existing road is opened up for through traffic.

**6. On-Street Parking**

This issue has already been raised and will be briefly revisited here. The proposed development will see increased volumes of two-way traffic using an existing cul-de-sac. This road is approx. 6m wide. At times when there is more than one car at the residences, on-street parking is unavoidable. At the moment, two cars cannot pass due to the presence of parked cars. – Photos Nos. 4 to 8 clearly illustrate same  
As previously stated, this road is insufficient to accommodate on-street parking and two-way traffic.



**7. Proposed Area Plan**

One must ask, in light of proposed planned developments for the area, where all the traffic generated by same, will exit. Logic dictates that via St. Joseph's road is unsustainable in the longterm.

**8. Noise**

Existing noise levels in the environs such as Aldworth Heights estate is measured to be approx. 35-45 dB(A)leq. This ambient noise level takes into account the existing traffic volume within the estate and the result of noise generated by traffic on the U5 (St. Joseph's Rd.). This relatively low ambient level reflects the normally quiet peaceful environment within the estate due to the lack of through traffic. If the proposed development proceeds the nearest noise sensitive locations, i.e., the houses now located in the cul-de-sac, will experience a rise of approx. 10dB(A)Leq in their daytime noise environment. When one considers that a 10dB(A) increase corresponds to a doubling of the perceived loudness levels this represents a significant increase. Undoubtedly, this will make a significant impact on the lives of the people living in the area.

**9. Conclusion**

The purpose of this submission is not to object to the development of lands R-15 & R-16. Its intention is to highlight the fact that the proposed use of present entrance to Aldworth Heights as an access is not feasible as we have outlined in detail. It is our belief that the only suitable entrance/exit to the proposed development, is from the N.72 (Spa Road) and that this should be incorporated into the Special Local Area Plan (SLAP) for Mallow Town.

Traffic Study as carried out on Friday 20<sup>th</sup> October 2006  
between the hours of 7am to 7pm

Time	Cars St. Joseph's Rd.	Lorries St. Joseph's Rd.	Vehicles Entering/Leaving Aldworth Heights Estate	Hourly Total
7 to 8 am	131	7	15	153
8 to 9 am	185	9	27	221
9 to 10 am	133	9	26	168
10 to 11 am	131	8	9	148
11 to 12 am	115	15	18	148
12 to 1 pm	117	9	13	139
1 to 2 pm	159	11	20	190
2 to 3 pm	144	12	12	168
3 to 4 pm	148	3	16	169
4 to 5 pm	181	9	20	210
5 to 6 pm	229	3	14	146
6 to 7 pm	164	3	21	188
<b>TOTAL</b>	<b>1837</b>	<b>98</b>	<b>211</b>	



**Bord Pleanála Case reference: JP04.320648**









## **Closing Statement**

St. Joseph's Road and Aldworth Heights Residents are of the very strong opinion that the Suggested Alternative Location for St. Joseph's Road Development which incorporates proposals on three options for Mallow/Fermoy Road Realignment, and its associated advantages, as detailed on pages 3 to 6 of this consultation document is a more feasible solution, in terms of public expenditure, residential access to amenities, Cork County Council's "10 minute" rule, road safety and connectivity, and the new relief road accessibility.

St. Joseph's Road and Aldworth Heights Residents respectfully ask Cork County Council to carefully consider all aspects of this consultation document and are available for formal consultation meetings and discussions.

Thank you for the opportunity to forward this submission to Cork County Council, at this time.

Signed:

**Frank Heffernan**

**Secretary - St. Joseph's Road and Aldworth Heights Representative Group**

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

0876345874

## Appendix 2 -Photo Montage

<https://photos.app.goo.gl/JUWJNm38KFrqrr6o7>

Please refer to soft copy submission as emailed to [laps@pleanala.ie](mailto:laps@pleanala.ie) to open link and view photo montage



## Photo Montage

<https://photos.app.goo.gl/JUWJNm38KFrqrr6o7>

Please refer to soft copy submission as emailed to [laps@pleanala.ie](mailto:laps@pleanala.ie) to open link and view photo montage

- Aldworth Heights, privately owned right of way entrance road
- Aldworth Heights Exit
- St. Josephs Road
- Town End of St. Joseph's Road
- Spa Glen

Photos taken circa 4.00pm on 4/9/2024 - After School Closure Times and before Peak Traffic Times

End