

# Response to Cork County LRD Opinion

For Development at Castlepark, Castlelands  
(townland), St. Joseph's Road, Mallow, Co. Cork  
on behalf of Reside (Castlepark) Ltd.

October 2024



McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS

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# 1. Introduction

This report addresses the specific information requirements and issues raised by Cork County Council (CCC) in their Pre-planning Large Scale Residential Development (LRD) Opinion issued on May 20<sup>th</sup> last, in relation to the proposed LRD at Castlepark, Mallow, Co. Cork, comprising 469 no. residential units, 1 no. creche, 1 no. interpretive centre and café and all associated ancillary development works at Castlepark, Castlelands (townland), St Joseph's Road, Mallow, Co. Cork.

The opinion issued by the Council was subsequent to 1 no. Section 247 meeting which took place on August 8<sup>th</sup>, 2023, and a Section 32B meeting which took place on April 22<sup>nd</sup>, 2024.

Following the pre-planning meetings, the Council issued an Opinion in accordance with Section 32D of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that the documentation submitted requires further consideration and/or amendment to constitute a reasonable basis for an application.

The specific information requested by CCC and our response to same is outlined in sections 2 of this report.

## 2. Information to be submitted with the LRD Application

Pursuant to article 16A(7) of the Planning and Development Regulations 2001 (as amended), CCC notified the prospective applicant that, in addition to the standard requirements as specified in articles 20A, 22 and 23, the specific information outlined below should be submitted with any application for permission. The specific information requested by CCC (***bold italics***) and our response to same, is as follows:

### 1. ***Natura Impact Statement (NIS)***

***An AA Screening Report and a Natura Impact Statement (NIS) were submitted to the planning authority. The NIS outlines a number of mitigations which are considered to be acceptable. However, mitigations 1 to 3 outline the requirement for pre-construction assessments and surveys to establish on-the-ground conditions. These assessments should be conducted prior to the completion and submission of any NIS as they determine:***

- ***Mitigation 1 - Site Conditions***
- ***Mitigation 2 - quantities of waste which will be generated by the excavation works for the substructure, roads and underground civil infrastructure, and how these will be stored, reused or exported from the Site.***

- **Mitigation 3 - locations of silt fencing, settlement tanks, lagoons, monitoring locations, site compounds and storage areas**

**A revised NIS should be prepared and submitted that accounts for all conditions and appropriate mitigations, to the Planning Authority. This should include but not limited to:**

- **All on-site conditions, including topography and physical characteristics of the site,**
- **and locations of where mitigations will be conducted (e.g. waste produced by excavation works, lagoons, etc.),**
- **information regarding wastewater and surface water management as requested by the Area Engineer**
- **proposed lighting, if any, along the south of the site, and how it may impact qualifying interest species, in terms of disturbance.**

The NIS prepared by Enviroguide and submitted with this application has been updated to reflect the findings from the site visit focusing on establishing Site conditions (Mitigation 1 in previous NIS). These findings are outlined in section 4.1.2.3 of the submitted NIS.

Mitigation measures were updated to include details of cut and fill requirements, and the location of the site compound and site access are shown in section 1.3 of the NIS.

Waste water and surface water information was updated with final designs and information received from the project engineers and is included in section 1.3.2.3 of the NIS.

Potential disturbance from public lighting is discussed in the updated AA Screening, in section 4.4.3 prepared by Enviroguide and submitted with this application.

## **2. Environmental Impact Assessment Summary Report**

**A summary report for EIA was submitted. It confirms that an EIAR that will be submitted with the full Large Scale Residential Development (LRD) application.**

**The EIA summary report outlined the habitats recorded on site and birds observed during site visits. The site was deemed unsuitable for badgers. Building onsite were assessed for bat roosts and none were found. No information on whether the trees onsite were assessed for potential roost features. While not mentioned in the EIA summary report, the AA Screening Report outlined that the vacant buildings were considered to provide potential roost habitat.**

**Preliminary bat roost assessment on all trees with and bounding the site shall be carried out and details submitted.**

An EIAR had been prepared by McCutcheon Halley Planning Consulting and is submitted with this application. The trees onsite

were assessed for bat roosting potential during a site visit in February 2023. No potential roost features (PRFs) were identified in the trees within the site, and thus all trees were classified as negligible bat roost potential. The site visit in July 2024 included an updated roost assessment and confirmed the earlier findings of no roost features within the trees.

These findings are outlined in section 13.6.5.2.2 - *Bats* within the Biodiversity Chapter of the EIAR.

### 3. Landscaping

***The landscaping masterplan includes a number of non-native trees and flowering plants that are not listed on the All-Ireland Pollinator Plan. The applicant shall submit a revised Landscaping Plan that:***

The planting plan and plant list has been revised to only include plants found in the All-Ireland Pollinator Plan or that are native to Ireland. The selected species will vary in specification and size.

- ***Provides native alternatives to the following species: *Betula utilis*, *Plantus x hispanica*, *Acer griseum*, *Prunus serrula*, and *Fagus sylvatica*. No non-native plants should be planted at the southern end of the site. Native species list in Appendix.***

The non-native tree species have been replaced with 100% native tree species. Refer to page 26-27 of the landscape and green infrastructure report and the landscape drawing package (Landscape plans) prepared by Simon Ronan Landscape Architect. Tree species are selected for longevity, suitability to local soil conditions, biodiversity and where required suitability for proximity to residential buildings. Native trees will be supplied from Tree Council approved nurseries.

- ***Provides for the planting of flowering plants that are listed in the All-Ireland Pollinator Plan***

All plants have now been chosen from the all-Ireland pollinator plan plant list. Please refer to page 26-27 of the landscape and green infrastructure report and the landscape drawing package (Landscape plans) by Simon Ronan Landscape Architect for details of the planting proposed.

- ***Provides for the management of grassland to allow for the growth of wildflowers, especially within the southern area closer to the SAC, that would naturally occur within the site and its surrounding environs.***

It is now proposed that grassland/meadow areas will be managed to encourage the development of native wildflowers. Wildflower seed mix will be purchased from an authentic Irish source. Please refer to soft landscape specification within the landscape and

green infrastructure report by Simon Ronan Landscape Architect for further details.

- ***Removes the bird watching tower.***

The bird hide has been removed from the scheme.

- ***Incorporates nest boxes into housing design and green infrastructure. Nest boxes should not be generic but aimed at Bird of Conservation Concern (e.g. swifts, swallows, house sparrow). Input from the developer's consultant ecologist should be sought.***

Nest boxes have been incorporated into the architectural design of some houses.

#### **4. Lighting and Ecology**

***Given the proximity to the Blackwater River SAC and bat commuting corridors, appropriate lighting along the southern end of the site is required. As the submitted landscaping plan provides for areas to encourage public use, lighting may be required. As such, the applicant is requested to provide information on such lighting and how nocturnal species (e.g. bats) will not be impacted. The Bat Conservation Trust Guidance Note (GN08/23 Bats and Artificial Lighting At Night) should be consulted.***

A public lighting plan has been prepared by DOSA Consulting Engineers in consultation with Enviroguide and Simon Ronan Landscape Architect. Section 4.4.3 of the submitted AA Screening prepared by Enviroguide discusses the potential for disturbance from public lighting on the SAC. The Biodiversity Chapter of the EIAR, section 13.9.2.2, describes potential impacts on bats from public lighting during the operational phase and includes mitigation measures to ensure that nocturnal species (e.g. bats) will not be impacted by the proposed development.

#### **5. Surface Water Management Plan**

- ***The focus of surface water management has shifted from volumetric control to wider benefits for water quality and biodiversity. Attenuation tanks are proposed but the policy position of the County Development Plan is that they should be to be avoided unless it is demonstrated that this is an exceptional/limited case for using such tanks as a last resort. As the CDP notes a range of solutions should be considered in a SuDS scheme which are designed to manage, treat and make best use of surface water, prioritising nature-based solutions and embracing opportunities to enhance green infrastructure and create attractive, nature rich open space. The applicant is requested to submit a revised drainage impact assessment with a drainage plan and SuDS***



***statement in accordance with each of the requirements of Table 2 and Table 4 of the Cork County Development Plan 2022 – Advice Note No. 1 Surface Water Management (Dec 2022). It should be clearly demonstrated how the design of the SuDS scheme reflects the topography, geology, and drainage characteristics of the site.***

Following the Opinion received from Cork County Council, the Drainage Impact Assessment report has been amended to a Surface Water Management Plan prepared by DOSA Consulting Engineers to address concerns raised by the Council. In order to ensure greater adherence to the Cork County Council Development Plan surface water management and water sensitive urban design and the Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design - Best Practice Interim Guidance Document, (CDP Objective 9.4) - The Department of Housing, Local Government and Heritage, the proposed attenuation tanks have been removed with the overall attenuation storage now being provided by the larger detention basins to the south of the proposed development which have been designed in conjunction with the proposed landscape plans. As a result of tying these to the landscape plans and integrating SuDS into green spaces this allows conformance with the 4 pillars of SuDS (Water Quantity, Water Quality, Amenity and Biodiversity) to be achieved. The revised Surface Water Management Plan outlines the design of these SuDS measures and also indicates how the design takes account of the type of maintenance that will be required for each SuDS measure. A SuDS Selection Table as per Table 2 of the Cork County Development Plan 2022 Advice Note No. 1 Surface Water Management (Dec 2022) has been included in the appendices of the Report.

- ***The applicant is requested to submit a revised drainage impact assessment with a drainage plan and SuDS statement in accordance with each of the requirements of Table 2 and Table 4 of the Cork County Development Plan 2022 – Advice Note No. 1 Surface Water Management (Dec 2022). It should be clearly demonstrated how the design of the SuDS scheme reflects the topography, geology, and drainage characteristics of the site.***

The Surface Water Management Plan prepared by DOSA Consulting Engineers outlines how the design of the SuDS scheme reflects the topography, geology, and drainage characteristics of the site. The detention basins and filter drains have been designed in conjunction with the landscaping plans to ensure they adequately reflect the site characteristics.



- ***A site-specific construction phase surface water management plan will be required having regard to the site sensitivity. A site drainage scheme indicating location of proposed nature-based solutions, interceptors, specification of same, and the catchments served by the proposed Nature Based Solutions (NBS) for SuDS elements and interceptors should be submitted. These catchments shall be delineated in revised drawings which shall show how the NBS for SuDS are integrated into the surface water treatment infrastructure. It is the Planning Authority's position that NBS solutions should be extensively employed as much as possible.***

The Site-Specific Surface Water Management Plan and drawings prepared by DOSA Consulting Engineers outlines the proposed drainage and location of proposed SuDS/nature-based solutions, and how these are integrated into the surface water treatment infrastructure.

- ***The subject site has access to stormwater infrastructure in the adjacent estate. Construction run off must not be allowed discharge to this network. Surface water from the development will be attenuated and discharge via hydrocarbon interceptor. Class 1 to be specified.***

Surface water from the development will be attenuated and discharge via hydrocarbon interceptor prior to each detention basin with the sizes indicated on the Drainage Plans prepared by DOSA Consulting Engineers and submitted with this application.

- ***Section 2.5.7 of the DOSA Infrastructure Report (dated 08/12/23) should be revised to include details of the silt trap(s) and hydrocarbon interceptor(s). Section 2.5.7 currently refers to permeable paving maintenance. 2.9 and 2.10 refer the interceptors serving a number of catchments.***

The Infrastructure Report prepared by DOSA Consulting Engineers has been revised to include details of the silt traps and hydrocarbon interceptors.

- ***It is proposed that surface water from the road network will discharge via swales. Tree pits, permeable paving in private parking areas and water harvesting are also proposed. However, the supporting details submitted is limited therefore clearer and more detailed information is required in respect of catchment served by swales and/or tree pits, pit construction type and overflow arrangement.***

The Surface Water Management Plan prepared by DOSA Consulting Engineers includes the design of the various SuDS elements. The typical SuDS details are indicated on the Proposed SuDS Details Drawing No. 661-2037 prepared by DOSA Consulting Engineers.

- ***The applicant shall submit details of the provision of a standard design detail to outline the flow path from the contributory paved areas to proposed tree pits.***

The typical detail indicating the flow path from the contributory paved areas to proposed tree pits are indicated on Drawing No. 6621-0024 prepared by DOSA Consulting Engineers.

- ***The provision of a filter drain adjacent to the paved road surface to the front of dwelling nos. 41-50 is noted. The applicant shall clarify if there is a proposed flow path here from the contributory paved area or should this filter drain be following the alignment of the footway within the green area.***

This proposed filter drain has been removed to reflect the concerns raised.

- ***Section 3 of the Drainage Impact Assessment and Section 2.1 of the Infrastructure Report outline proposal to connect to the existing Storm Water Network and ultimately utilise the Discharge Point(s) associated with the existing Castlepark Development. It needs to be clarified if the existing network has sufficient hydraulic capacity to cater for the additional area served as the existing greenfield run-off rates are not discharging to the network at present.***

The proposed stormwater network will now connect to this network south of the detention basins. All of the development will attenuate to a greenfield runoff rate as outlined in the infrastructure Report prepared by DOSA Consulting Engineers.

- ***Section 2.2, Surface Water Drainage Network of the Infrastructure Report references a DOSA Drawing No.6621-0020 for details of Proposed Surface Water Outfall but this drawing does not appear to have been provided with the Section 32 Documentation. Layout Drawings and Details are required for the Surface Water Drainage outside of the site to include any proposed connections from Detention Basins to the Final Discharge Pipework. Standard Details for Inlet and Outlet Pipework to Detention Basins also required.***

The proposed connection to the surface water drainage has been revised to ensure a connection within the redline boundary from the proposed detention basin.

## 6. Water Supply

- ***Water Supply for the site is addressed in the Infrastructure Report submitted and Watermain Layouts (1-3) presented. It's noted that the proposed water-main does not appear to be shown on the layouts submitted and this will be required for assessment.***

The watermain connection for the site is shown on the Proposed Watermain Layout Drawing No.'s 6621-2030, 6621-2031 & 6621-2031 prepared by DOSA Consulting Engineers.

- ***The Confirmation of Feasibility also outlines various clarifications and permissions required by Uisce Eireann to permit the connections proposed proceed via the existing Castlepark Infrastructure. Confirmation of capacity for the existing mains to be utilised and permissions for connection shall be submitted.***

The Confirmation of Feasibility has been revised and updated by Uisce Eireann on the 25<sup>th</sup> September 2024. We can confirm that the Applicant is the owner of all roads, common areas and service networks within the existing Castlelands estate. The estate has not yet been taken in charge. The Applicant has the relevant control and authority to undertake any infrastructure upgrades which may be identified by Uisce Eireann as part of the connection application. The Applicant is therefore in a position to obtain all necessary quality assurances, wayleaves, easements, confirmation of capacity and permissions with regard to infrastructure connections to the development.

## 7. Wastewater Treatment

- ***Confirmation of Feasibility (dated 23/02/2024) has been supplied from Uisce Eireann with the submission and lists Wastewater Connection as 'Feasible without infrastructure upgrade by Uisce Eireann'. This is in contradiction to the Infrastructure Report, Section 3.1 where Wastewater Connection is listed as 'Feasible subject to upgrades,' clarification required here.***

The Confirmation of Feasibility has been revised and updated by Uisce Eireann on the 25<sup>th</sup> September 2024. This confirms that the wastewater connection is feasible without infrastructure upgrade by Uisce Eireann. As a result of this, it is now proposed to connect directly to this network without the usage of On-Site Wastewater Treatment System. This will involve discharging the proposed development in its entirety to the existing collection network in Castlelands Estate.

- ***The applicant is required to satisfy the Planning Authority that the necessary connection agreement/way leaves are in place with respect to accessing private infrastructure in the adjacent estate as per Uisce Éireann connection requirements.***

We can confirm that the Applicant is the owner of all roads, common areas and service networks within the existing Castlelands estate. The estate has not yet been taken in charge. The Applicant has the relevant control and authority to undertake any infrastructure upgrades which may be identified by Uisce Éireann as part of the connection application. The Applicant is in a position to obtain all necessary quality assurances, wayleaves, easements, confirmation of capacity and permissions with regard to infrastructure connections to the development.

- ***The Confirmation of Feasibility also outlines various clarifications and permissions required by Uisce Éireann to permit the connections proposed proceed via the existing Castlepark Infrastructure. In particular confirmation of capacity for the existing arterial sewers to be utilised and permissions for connection shall be submitted.***

As above, we can confirm that the Applicant is the owner of all roads, common areas and service networks within the existing Castlelands estate. The estate has not yet been taken in charge. The Applicant has the relevant control and authority to undertake any infrastructure upgrades which may be identified by Uisce Éireann as part of the connection application. The Applicant is in a position to obtain all necessary quality assurances, wayleaves, easements, confirmation of capacity and permissions with regard to infrastructure connections to the development.

- ***The existing network within the Castlelands estate is not taken in charge by the water services authority and therefore the applicant shall further liaise with the infrastructure owner to obtain permission to connect.***

As above, we can confirm that the Applicant is the owner of all roads, common areas and service networks within the existing Castlelands estate. The estate has not yet been taken in charge. The Applicant has the relevant control and authority to undertake any infrastructure upgrades which may be identified by Uisce Éireann as part of the connection application. The Applicant is in a position to obtain all necessary quality assurances, wayleaves, easements, confirmation of capacity and permissions with regard to infrastructure connections to the development.

- ***The applicant shall liaise with the infrastructure owner and confirm that the existing network is in a suitable***

***condition and has sufficient capacity to cater for the additional load created by the proposed development.***

This estate has not taken in charge by the water services authority of Cork County Council, but this process is currently ongoing with the Taking in Charge process estimated to be completed by the year end. Mr. John Aherne, Estates Engineer, Cork County Council has completed an inspection for the taking in charge process and has confirmed that the infrastructure has been completed to an appropriate standard.

- ***The applicant is proposing to discharge part of the proposed development to a treatment unit. The upgrade works to Mallow WWTP have been completed and the plant is currently undergoing process proving stage. Given the status of the Mallow WWTP upgrade works, the applicant is requested to further liaise with Uisce Éireann with a view to discharging the proposed development in its entirety to the existing collection network in Castlelands Estate. Revised layout drawings to be submitted, as necessary.***

The Confirmation of Feasibility has been revised and updated by Uisce Éireann on the 25<sup>th</sup> September 2024. This confirms that the wastewater connection is feasible without infrastructure upgrade by Uisce Éireann. As a result of this, it is now proposed to connect directly to this network without the usage of On-Site Wastewater Treatment System. This will involve discharging the proposed development in its entirety to the existing collection network in Castlelands Estate.

- ***Section 3.1.3 of the Infrastructure Report proposes an On-Site Wastewater Treatment System to negate the impact of the development on the Mallow WWTP but the necessity for this is questionable given the content of the Confirmation of Feasibility from Uisce Éireann and the proposal poses an unnecessary long-term risk to the Local Authority. If an on-site WWTP is to be permitted to serve the proposed development in addition to the existing Uisce Éireann Mallow WWTP Infrastructure written confirmation from Uisce Éireann will be required that the proposed WWTP will be taken into the charge of Uisce Éireann on completion. Should such confirmation be forthcoming from Uisce Éireann there are a number of operational issues associated with the proposed WWTP to be addressed to include the following:***
  - ***Maintenance and De-Sludging Access***
  - ***Site Fencing***

- ***Maintenance Contract for the Operation and Maintenance of the System pending Uisce Eireann takeover***
- ***The siting of the unit should also be considered in the context of siting, odours and prevailing winds relative to the proposed housing development.***
- ***The applicant has not submitted any details on how they intend to operate or maintain the proposed plant or if a third party will be employed to carry out same. The applicant shall submit details in relation to the operation and maintenance of the proposed treatment plant.***
- ***The applicant shall review the access to the treatment unit. The access route and hardstanding area within shall be sufficient to accommodate a vacuum tanker and/or operation and maintenance vehicles. There shall be sufficient space between the various units on the site to enable maintenance operations and equipment replacement to be carried out. The applicant shall also confirm if the treatment unit will be fenced off and if not, the applicant shall confirm the alternative security measures to be used.***

It is now proposed to connect directly to this network without the usage of On-Site Wastewater Treatment System.

- ***Notwithstanding any justification outlined for a proposed onsite WWTP, there are concerns regarding the location and siting of the proposed WWTP within a shared central space and the potential for odours and prevailing winds relative to the housing development particularly if its provision is not a fundamental requirement for the delivery of the proposed housing.***

It is now proposed to connect directly to this network without the usage of an on-Site Wastewater Treatment System.

#### **8. Public Lighting**

- ***The design, materials and installation must comply with the Cork County Council Public Lighting Manual and Product Specification 2023, which is available on the CCC web site. (Please note the section on design and in particular all the items in Appendix H and especially Figure 4).***

A public lighting plan has been prepared by DOSA Consulting Engineers and submitted with this application. The design, materials and installation comply with the Cork County Council Public Lighting Manual and Product Specification 2023.



- ***The applicant is to ensure that the columns being installed are in accordance with the CCC Public Lighting manual 2023. Plain tubular stepped columns are not acceptable. Columns should be located on the outside of the tight bends, where applicable.***

The columns being installed are in accordance with the CCC Public Lighting manual 2023. Plain tubular stepped columns are not proposed. It is proposed to use 6m Octagonal Column on the estate roads. Columns have been located on the outside of the tight bends, where applicable.

- ***Tree locations to columns needs to be revised by applicant. There are a number of trees located within the 10m radius of the lighting column. The Applicant needs to carry out a cross check between the location of the lights and trees so as to ensure that no light is within 10m of a tree so that the lights can operate effectively. This needs to be reflected in a re-design of both the lights and the landscaping.***

The public lighting layout has been prepared in consultation with the landscape architect and ecologist. The proposed public lighting layout is as indicated on the enclosed Kelliher Electrical Drawing No.'s 6621-2080 & 6621-2081 Lighting Layout & Lighting Report KE/RE/CPC/02. This has been designed to ensure that trees are not to be planted within 10m of any proposed lamp standard.

- ***The applicant needs to revise columns that have been located at the back of footpaths which are separated from the road by the footpath and grass verge with trees e.g. Columns No. 54A, 56A, 57A, 58A, 59A. Accessibility of these columns for maintenance purposes by means of a hydraulic hoist would not be possible with the trees in the grass verge. Location of trees would reduce light spill onto the roads. Applicant needs to revise the column location to grass verge between the road and the footpath.***

The applicant has revised columns located at the back of footpaths which are separated from the road by the footpath and grass verge with trees e.g. Columns No. 54A, 56A, 57A, 58A, 59A. All column locations have been relocated where possible to the grass verge between the road and the footpath.

- ***The applicant shall revise the location of column No. 62B as it appears to be located in the middle of the driveway facing the building.***

This column 62B has been relocated.



- ***The applicant needs to revise the location of columns 82C, 83C, 86C, 87C, 127C, 128C, 129C, 132C & 133C as they appear to be located in the pavement in front of the unit's front doors.***

Columns 82C, 83C, 86C, 87C, 127C, 128C, 129C, 132C & 133C have been relocated.

- ***Some column's locations are situated in areas that are not accessible for maintenance. All lighting points shall be accessible by means of a hydraulic hoist, for maintenance purposes. Such a hoist requires a minimum paved vehicular access of 3.0 metres. If such access is not available arrangements shall be made for the use of hinged columns. These columns should be identified on the drawings.***

All lighting points shall be accessible by means of a hydraulic hoist, for maintenance purposes.

- ***The applicant shall ensure that lighting onto resident properties complies with GN01/20 for the reduction of obtrusive lighting. Some columns are located at the back of the footpath very close to the front façade of the units, where they could be relocated into the grass areas between car parking spaces or green areas. E.g. Columns 25A, 41C, 42C, 43C, 67G, 68C, 81C, 94B, 106B, 142C, 143C, 121B, 122B, 157C,***

Any lighting onto resident properties complies with the requirements of GN01/20 for the reduction of obtrusive lighting. Where possible, these columns have been relocated into the grass areas between car parking spaces or green areas.

## **9. Design and Layout**

- ***Taking account of the designation of Mallow as a key town in the RSES and Cork CDP 2022, objective HOU 4-7 of the Cork CDP 2022 and the Sustainable and Compact Settlement Guidelines for Planning Authorities 2024 along with the proximity to the town centre, high quality public open space and potential for enhanced pedestrian/cycle routes to the town centre and the planned high frequency public transport under the Cork Area Commuter Rail Programme, it is considered that the proposed density of 35.9 is acceptable. The applicant is requested to clarify with drawings and explanatory text of how the residential density has been measured and clearly explain the areas included and excluded. The applicant should clearly demonstrate consistency and compliance with Table 1 of Appendix B of the Sustainable and Compact Settlement Guidelines for Planning Authorities (2024).***

The scheme has been revised in order to better meet the targets set out in the RSES and Cork CPD 2022, objective HOU 4-7 of the Cork CDP 2022 and the Sustainable and Compact Settlement Guidelines for Planning Authorities 2024. A revised unit typology has been introduced to provide a more innovative design while providing a greater variation of units to benefit a wider range of users. Key items within the guidelines such as the reduction of garden sizes and separation distances have been incorporated into the layout. Other Policy and Objective items within the guidelines such as the public open space requirements and car and cycle parking have helped influence the revised layout in order to create an innovative and compact development that is in line with the relevant policy documents. A detailed Developable Area Calculation Plan by Deady Gahan Architects has also been prepared along with a detailed summary schedule table in order to demonstrate how Table 1 of Appendix B of the Sustainable and Compact Growth Settlement Guidelines for Planning Authorities 2024 has been applied.

- ***The circulatory nature of the internal road layout is noted and the applicant is requested to explore whether the provision of some vehicular cul-de-sacs (with filtered pedestrian/cycle permeability) on the internal layout may encourage more direct routes for traffic locally to the main local streets Kingsfort Avenue and Castlepark Avenue. For example, the continuous road serving units 27/28 ... 30/31 could be split and not have a through road. Similar might also apply to road serving end of roadblocks 148/149, etc.***

The scheme has been revised in order to incorporate cul de sac arrangements in areas to promote pedestrian priority where possible. Specific areas of the scheme have been revised to incorporate cul de sac arrangements which aim to prioritise pedestrian and cycle permeability and to encourage more direct routes for traffic locally to the main streets within the Castle Park development.

- ***Regarding the proposed 3 storey duplex and apartment blocks to the south of the lands with a traditional and dated design these should be revised to provide a more innovative design which maximises the site's potential and relationship with the Blackwater Amenity Corridor. A revised design which maximises passive surveillance, provides an attractive and animated interface, connects with the green infrastructure corridor and takes advantage of the southern aspect and views resulting in a better living environment for future occupants and providing a broader range of housing typologies that support greater housing***

***affordability and choice should be considered. There may be scope for increased height at the southern part of the site subject to overall high-quality design of these units/blocks. Refer to Section 28 Guidelines 'Urban Development and Building Heights Guidelines for Planning Authorities 2018' and Section 4.10 of CDP 2022 and Policy Objective HOU 4-8 of the Cork CDP 2022.***

The 3 storey Apartment/Duplex units located within character area 4 to the south of the scheme have been revised in order to create a more innovative and attractive streetscape while providing a high density and permeable edge to the public park to the south. The corner apartment / duplex units have been revised with side access to activate the key corners of the scheme and to provide additional passive surveillance in the communal areas and over the public park to the south.

- ***Details for site development works including all landscaping (hard landscaping – seating, furniture details) bin / bike stores and EV charging and all boundary treatments should be submitted for assessment.***

Please refer to the landscape drawings and report prepared by Simon Ronan Landscape Architects submitted with this application for details on hard landscaping and boundary treatments proposed throughout the site. Please also refer to the FI landscape response document by Simon Ronan Landscape Architects submitted which adds further clarification.

#### **10. Road Access**

- ***A number of vehicular access locations are shown on the Proposed Site Plans submitted from the subject site to the existing Castlepark Development. These include 3 No. to Kingsfort Avenue, 1 No. to Maple Square and possibly 1 No. to Maple Wood / Castlepark Avenue adjacent to unit no. 454 / 455, this should be clarified. If access point to Maple Wood / Castlepark Avenue is not proposed here possibly a turning bay should be incorporated.***

It is proposed that an access point is provided adjacent to unit number 460 from the scheme to Maple Wood. Please refer to drawing no. 23107/P/003 by Deady Gahan Architects for further details.

- ***The access route from the Southern portion of the proposed development to Castlepark Avenue via Maple Square is of some concern in particular the turning movements which will be required at the junction of Maple Square / Maple Wood / Castlepark Avenue / Maple Avenue. Signage and Road Markings may be***

***required here to reinforce priority on the various junction arms. The circulatory nature of the internal road layout is also noted. The provision of some vehicular cul-de-sacs on the internal layout would encourage more direct routes for traffic locally to the main local streets Kingsfort Avenue and Castlepark Avenue.***

Please refer to the drawings and documentation prepared by DOSA Consulting Engineers for details on street signage and markings. The scheme has been revised in order to incorporate cul de sac arrangements in areas to promote pedestrian priority where possible. Specific areas of the scheme such as the access street outside units 20 - 31, and the shared surface street outside units 234 - 247 have been revised to incorporate cul de sac arrangements which aim to prioritise pedestrian and cycle permeability and to encourage more direct routes for traffic locally to the main streets within the Castle Park development

- ***The DMURS Compliance Statement references traffic calming by means of both horizontal and vertical deflections and the provision of the horizontal deflections is acknowledged on the street layout plans submitted as is the use of surface material changes for shared surface areas. However, the incorporation of some vertical deflections may also be required with particular reference to the provision of raised tables at some of the internal junctions. This approach should also be considered in the context of traffic from the proposed development accessing the subject site via the existing Castlepark Development.***

These junctions have been illustrated with further detail provided on the Proposed Traffic Calming Measures Drawing No.'s 6621-2013-RevA, 6621-2014-RevA, 6621-2015-RevA & 6621-2016-RevA by DOSA Consulting Engineers.

The Quality Audit prepared by Hegsons Design Consultancy Ltd (Item 9.2) recommends that standard 30 km/hour Slow Zone speed limit signage should be provided on the Kingsfort Avenue and Castlepark Avenue access streets to the existing Castlepark/Castlelands residential estate, with reference to DMURS and the DoT Traffic Signs Manual. In addition, the same Quality Audit (Item 9.3) recommends that vertical deflection, in the form of raised tables at the internal junctions along Kingsfort Avenue are considered in order to better enforce the 30km/hour Slow Zone speed limit signage. The applicant supports the provision of these measures.

- ***Directional Signage / Road Naming should be upgraded throughout the estate from the 2 No. public road***

***entrances on St. Josephs Road along the main local streets Kingsfort Avenue and Castlepark Avenue.***

Directional signage has been proposed within the Quality Audit and will be upgraded throughout the estate, in particular along the main local streets Kingsfort Avenue and Castlepark Avenue.

- ***Road Markings and Signage proposals in accordance with the current Traffic Signs Manual shall be submitted.***

Please refer to the Traffic Calming drawings by DOSA Consulting Engineers which provides details on the Road Markings and Signage proposals which are in accordance with the current Traffic Signs Manual.

- ***The applicant is requested to analyse and present the traffic impact on the existing adjacent residential development and appropriate mitigation measures should be proposed.***

An updated TTA has been prepared by Punch Consulting Engineers and submitted with this application. The updated TTA analyses and presents the traffic impact on the existing adjacent residential development and appropriate mitigation measures have been proposed.

#### **11. Traffic and Transportation Assessment (TTA)**

- ***The TTA is preliminary in nature. The TTA is required to be updated in accordance with the TII TTA Guidelines , including assessing the impact on the existing residential development, and proposals should be provided to mitigate the traffic impact of the development on the road network.***

An updated TTA has been prepared by Punch Consulting Engineers and submitted with this application. Mitigation measures have been proposed in Section 11 of the TTA. The proposed development has a reduced car park provision to facilitate shared transport and the use of alternative modes of transport. The applicant has proposed measures within their control such as the provision of adequate cycle parking, encouraging the use of sustainable transport, enhanced pedestrian and cyclist connectivity within the development. The applicant will implement sustainable transportation initiatives and active monitoring within the development to promote modal change.

- ***The TTA has assumed that the distribution of the future traffic will be as per the existing. For an LRD adjacent to a congested centre that experiences delays during peak periods, it is considered likely that, without mitigation, traffic would re-distribute. This would***

***result in higher than currently predicted impacts on a wider range of junctions than has been assessed. The applicant shall assess the development with an area wide model that considers redistribution.***

An area-wide traffic model has been implemented to evaluate the potential impact of the proposed development on the surrounding road network. This comprehensive assessment covers nine key junctions. Traffic distribution has been analysed using data from recent traffic surveys, which reflect current driver behaviour during peak hours. Given the existing road network configuration, it is improbable that drivers will seek alternative routes, as there are no viable access routes to the west or south of the town that bypass the town centre.

- ***The proposed development's traffic may impact on the adjacent residential area, through which traffic would access St. Joseph's Road. This impact needs to be assessed and mitigation proposed to reduce this unquantified impact.***

Please refer to the TTA prepared by Punch Consulting Engineers and submitted with this application which assesses the impact of the adjacent residential area. Mitigation measures have been proposed in Section 11 of the TTA.

- ***There appears to be a discrepancy within the existing traffic flow data presented for Mallow Bridge North and Mallow Bridge South Junctions. Figure 3-13 of the TTA on Page 12 indicates peak traffic volumes of 427 (AM) and 393 (PM) southbound to Mallow Bridge but Figure 3-9 below on Page 12 indicates a traffic volume southbound from Bridge Street (Mallow Bridge) of a maximum overall 142 (AM) and 118 (PM). Similarly, there appears to be a discrepancy between the northbound traffic volumes in the peak hour for Mallow Bridge North and Mallow Bridge South Junctions. This needs to be addressed.***

Please refer to the revised TTA prepared by Punch Consulting Engineers which addresses these discrepancies.

- ***Section 8 of the TTA, Trip Assignment and Distribution assigns future trip data solely on the basis of the surveyed traffic directional flow and does not appear to include for any potential future trip variation due to additional future queuing and junction capacity issues as outlined in Section 9, Assessment and Road Impact. This is of particular importance when the capacity analysis completed at Junction 2, Castlepark South is considered in conjunction with the queueing data***



***presented for Junctions of Bridewell Lane and N72 plus Infirmary Lane and the N72, St. Joseph's Road.***

The updated TTA has incorporated trip variation, anticipating changes in distribution as modal shift initiatives and future transport proposals are implemented. Despite these changes, it is unlikely that traffic patterns will deviate significantly from current congestion trends, as there are no alternative routes available for drivers. Consequently, traffic distribution is expected to follow existing patterns.

- ***The analysis submitted does not include any anticipated impact from other LRD's in the Spa Glen Area which are also currently in the Planning System. This should be included in the assessment.***

Surrounding area proposed developments have now been considered and their potential impacts have been assessed in the updated TTA prepared by Punch Consulting Engineers.

- ***The Junction Assessment has not been completed for the Main Street (Thomas Davis St) Junction with N72 at Spa Square and also the Mallow Bridge North and South Junctions. Assessment of these Junctions and other relevant Junctions would be required to determine the potential impact of Phase 1 in particular on the National Secondary Route, N72 and also the Regional Routes R620 and R619 at Mallow Bridge North and South. Section 9.1.8 of the TTA outlines the anticipated significant increases in RFC and Queue Lengths for the Town Centre Junctions modelled for Phase 1 alone and at present even the permitting of Phase 1 would be subject to satisfactory data on the remaining junctions to be modelled.***

The requested modelling of the junctions has been carried out and the results included in the updated TTA prepared by Punch Consulting Engineers.

- ***Detailed and achievable mitigation measures in the TTA should be submitted. This will be required to assist in the alleviation of the modelled increase in town centre congestion associated with the proposed development and proposals in this regard should be provided for in the assessment. The Mallow Relief Road Project is mentioned as a significant potential measure to alleviate a proportion of the modelled congestion, but it must be noted that this is a TII Project and the provision of funding for delivery of same is not in the control of the Planning Authority.***

The updated TTA prepared by Punch Consulting Engineers comprehensively includes mitigation measures in section 11 and



applies modal shift pattern targets in line with the planning authority assessments. However, it is important to note that the responsibility for mitigating traffic congestion should not rest solely on the applicant and the proposed development.

- ***No mitigation measures have been proposed to enhance the development's access to public transport or indicate requirements enhance capacity in the existing external road network to facilitate the predicted high level of traffic that would be generated by the development in its current format. TII's TTA Guidelines 2014 (PE-PDV-02045) require mitigation proposals to be detailed. Mitigation has not analysed. Details addressing same shall be submitted.***

The updated TTA prepared by Punch Consulting Engineers includes detailed mitigation measures in section 11. It is important to note that the applicant can only address mitigation within the scope of the proposed development and should not be held responsible for external mitigation measures.

- ***Auto-track analysis is mentioned in Section 11.3 of the TTA but does not appear to have been included with the submission. This should be submitted.***

Autotrack drawings have been prepared by DOSA Consulting Engineers and submitted with the application.

## **12. Sustainable Transport**

- ***A Mobility Management Plan (MMP) has been submitted. It is unclear how the MMP would be applied and be effective in reducing the car-based trip making from the proposed development. Its purpose does not appear to have been significantly applied to the development in its design. No measures have been applied, for example, to manage demand such as through parking provision. It is therefore not clear from submitted documents how this can be maintained and enforced indefinitely, as is required for an MMP. Mitigation measures need to be hard measures and implemented at the outset. The developer shall provide clear and achievable mitigation measures that would disincentivise car use. This would require demand management such as a parking strategy.***

A site specific Mobility Management Plan and Parking Management Plan have both been prepared by Hegsons Design Consultancy to support the planning submission and with a number of hard and soft mitigation measures proposed and recommended to be implemented from the outset of the proposed development. The mitigation measures, such as

demand management of car parking and the provision of on-site cycle parking and infrastructure, would disincentivise car use.

- ***The County Development Plan 2022 provides maximum carparking standards therefore there is flexibility to provide less car parking for this proposal. Having regard to identified issues in relation to transport and junction capacity, the applicant is requested to review the proposed level of parking provision and the arrangements of such provision with a view to a further reduction. In line with SPPR 3 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024, the applicant is requested to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly given they are close to the maximum provision.***

The parking proposal for the development has been revised in order to further reduce the parking provision for the scheme to address possible issues regarding transport and junction capacity. The scheme has been developed to minimise the need for parking where possible. Parking numbers have also been reduced where possible. 1 no. parking space per unit has been provided for all 1, 2, and 3 bed houses in the scheme with 2 no. spaces provided per 4 bed houses.

0.8 spaces per unit are also provided for the apartments / duplexes. New pedestrian and cycle connections are proposed within the scheme that connect the development to Mallow town centre in the form of a Greenway. This Greenway provides pedestrian and cycle access through the existing Castle Park scheme or via the public park to the south of the site.

- ***Provision of safe, secure and convenient cycle parking is essential to support cycling as a realistic transport choice. The developer shall submit details and drawings (including a revised site layout map) of the location of bicycle storage and parking. The current minimum cycling parking standards are contained Tables 12.8 and 12.9 of the CDP 2022 and the developer shall clearly demonstrate how these standards were calculated and achieved. Storage for bikes and cargo bikes shall be provided, in particular at units that do not have rear access and within the crèche.***

Adequate bike parking has been provided throughout the scheme. Please refer to drawing no. 23107/P/010A by Deady Gahan Architects for more details which includes storage for

bikes and 3 no. cargo bike stores which have been provided near the creche to cater for a wider range of users.

- ***The widths of shared surfaces is required to be clarified. At least 4.0 metres is preferred for the key 'Greenway' route and a minimum width of 3.0 metres is preferred for other shared two-way areas.***

The proposed Greenway that runs through the scheme connecting the public park to the south to the proposed scheme and the existing Castle Park development has been widened from 3 metres to 4 metres in order to cater for a greater number of users and to promote a safe and accessible pedestrian and cycle network.

- ***Appropriate lighting is required for the cycling/walking route to ensure that this is usable during dark hours and throughout the year. Details of same shall be submitted and this shall have regard to ecological issues as outlined earlier in this Opinion.***

A public lighting plan has been prepared and submitted with this application which proposes appropriate lighting for the cycling/walking route to ensure that this is usable during dark hours and throughout the year. The public lighting proposal has had regard to ecological issues as outlined earlier in this Opinion.

- ***The submitted Road Safety Audit is not complete and is therefore not satisfactory. A completed Stage 1/2 Road Safety Audit is required for the proposed development along with details of proposals to address the recommendations of same. A layout drawing shall be submitted detailing how each Road Safety Audit item has been addressed.***

A Road Safety Audit has been undertaken to inform the final site design and is submitted as part of the planning submission. The issues raised in the previous Road Safety Audit have been incorporated into the revised site layout by Deady Gahan Architects.

- ***Pedestrian and cycle routes within the development shall have priority over vehicle traffic at raised crossings or controls, as appropriate, depending on predicted internal traffic volumes.***

Pedestrian and cycle routes within the development will have priority over vehicle traffic at raised crossings or controls.

- ***A comprehensive Quality Audit should be submitted including walkability assessment and measures required to provide pedestrian and cycle connectivity with key locations outside of the site, including the town centre and public transport services, to mitigate***

***the potential traffic impact of the proposed development. Mitigation measures to address deficiencies are required.***

A Quality Audit and Street Design Audit has been prepared by Hegsons Design Consultancy and submitted with this application. The audit includes a walkability assessment and measures required to provide pedestrian and cycle connectivity with key locations outside of the site. The audit identified items which the applicant can address and others which would need to be discussed and undertaken in consultation with the local authority. A range of mitigation measures have been incorporated into the proposed site layout in order to enhance the area.

- ***Proposals are required to address the topographical challenges associated with pedestrian and cycle connectivity between the proposed site works and the existing pedestrian and cycle infrastructure within the park to the south of the development.***

The proposed levels along this walkway are indicated on the Proposed Site Layout Drawing No. 6621-2021-RevC by DOSA Consulting Engineers. The maximum gradient of this path will be 1 in 20 to ensure Part M compliance. As indicated on the landscape plan, a plaza/platform is proposed in order to create a connection point from this link to the end of the existing Greenway at the junction with an existing minor road.

### **13. Outline Construction Traffic Management Plan**

***Outline Construction Traffic Management Plan has been submitted and includes proposed construction traffic routes to the site via St. Josephs Road, L-1220-0 and existing Castlelands Estate Roadway, Kingsfort Avenue. This shall be updated to include data on construction traffic volumes as it currently not presented. The impact on the proximity of the Primary School entrance located to the northern boundary of the existing Castlepark Development should be assessed and appropriate mitigation measures proposed. Consideration should be given to the provision of a temporary construction access via agricultural lands to the north-east if possible.***

Please refer to the updated Outline Construction Traffic Management Plan prepared by Punch Consulting Engineers which has been updated to include data on construction traffic volumes. The impact on the proximity of the Primary School entrance located to the northern boundary of the existing Castlepark Development has been assessed and appropriate mitigation measures proposed. As outlined in the Outline Construction Traffic Management Plan by Punch Consulting Engineers, the construction access will be via an existing entrance to Castlepark House to the east with a link through

agricultural fields to the site, thus removing traffic from the local residential streets.

#### 14. Phasing

***Phasing of the development should be clearly aligned to infrastructural requirements. The impact on the phasing of the housing scheme and the thresholds of development associated with each phase should be clearly articulated and substantiated. The applicant should prepare a table of infrastructure constraints identified, the thresholds of development associated with each phase and the required intervention/mitigation measures to facilitate each phase of development. It is the opinion of the Planning Authority that the first phase of development shall deliver the highest level of density within the overall subject site.***

The phasing of the scheme has been revised to address the comments in the opinion and the Phase 1 application RFI. A revised phasing drawing has been prepared by Deady Gahan Architects along with a Phasing and Implementation Strategy prepared by McCutcheon Halley Planning Consultants.

#### 15. Archaeology

- ***A full archaeological assessment of the proposed development site shall be submitted. While the testing has been completed along with geophysics, this does not constitute a full archaeological assessment of the proposed development site. The Ringfort CO033-012, just outside the proposed development site has not been addressed. There are no measurements provided by the archaeologist from the ringfort to the proposed development site or the nearest proposed houses, roads etc. No visual impact of the proposed development on the ringfort has been addressed by way of suggested mitigation measures such as a landscape plan, screening etc. No suggested buffer zones are proposed to protect the setting of the monument in accordance with CDP Objective HE16-2. These matters should be addressed, and details submitted.***

Please refer to Chapter 14 of the submitted EIAR which includes a full archaeological assessment of the proposed development site. The Ringfort CO033-012, just outside the proposed development site has been addressed. Measurements are provided from the ringfort to the proposed development site and the nearest proposed houses, roads etc. The visual impact of the proposed development on the ringfort has been addressed by the archaeologist. Suggested buffer zones are proposed to protect the setting of the monument in accordance with CDP Objective HE16-2.

- *The fulacht fiadh CO033-090 is mentioned in the archaeological report as being located in a proposed green area within the development site but again not addressed in the archaeological report in terms of measurements to the nearest element of the proposed development (roads, houses etc). No buffer zones are provided and no management plan for the future management of the monument within the site is provided (in accordance with CDP HE16-10 which concerns 'Management of Monuments within Development Sites' and states that where archaeological sites are accommodated within a development it shall be appropriately conservation/ protection with provision for a suitable buffer zone and long-term management plan put in place all to be agreed in advance with the County Archaeologist.*

Please refer to Chapter 14 of the submitted EIAR which includes a full archaeological assessment of the proposed development site. The fulacht fiadh CO033-090 is addressed in the archaeological report in terms of measurements to the nearest element of the proposed development (roads, houses etc). A buffer zone is provided and a management plan for the future management of the monument within the site is provided.

- *The above details are required to be addressed and completed to provide the Planning Authority with assurances that the Recorded Monuments which are subject to statutory protection are adequately addressed by way of a full impact assessment including visual impact assessment. The status of the Report submitted by John Cronin and Associates is marked Draft and dated February 2024. It may be the case that the assessment is incomplete and not finalised. It is also noted in the MH Planning Report (February 2024, page 18) that 'appropriate buffer zones have been provided around the archaeological monuments on site with input from John Cronin and Associates'. Buffer zones and scaled drawings have not been addressed in the report. The landscape Master Plan has mentioned archaeological sites but it is not the remit of the landscape specialist to provide mitigation measures for the protection of the archaeological heritage. No cross referenced are made in the archaeological assessment to the landscape plan. Thes matter should be address and details submitted.*

The above details are addressed and completed in Chapter 14 of the submitted EIAR to provide the Planning Authority with assurances that the Recorded Monuments which are subject to

statutory protection are adequately addressed by way of a full impact assessment including visual impact assessment. Details of buffer zones and scaled drawings have been submitted with this application. Cross references are made in the archaeological assessment to the landscape plan.