

Niamh O'Connor,
11 The Monks,
Mountain Rd.,
Carrigaline,
Co Cork.
P43 Y628

The Secretary,
An Bord Pleanála,
61 - 64 Marlborough Street,
Dublin 1.
D01 V902

15th July 2025.

Cork County Council Planning File 25/4551.

Large Scale Residential Development at Mountain Road, Kilmoney, Carrigaline, Co. Cork

Response to Appeal by Bridgewater Homes Ltd.

Reference No: ABP-322734-25

To whom it may concern:

Firstly, I want to make it very clear that this submission is a response to both appeals

1. Submission **against the Appeal by Bridgewater Homes**
2. Submission in **full support of the original appeal submitted by the combined Mountain Road residents' group.**

I do not have a background in any area or profession relating to construction, engineering, planning or local government, but as a state-regulated health professional and scientist I am certainly capable of critical thinking, appraisal of details, research methodology and evidenced-based practice. I see none of that in the planning applications that the developer ('The applicant') has submitted to date. It took them three attempts to actually submit the required planning documentation in the correct format. Now they are appealing the condition with regards to their obligation to complete the mountain road upgrade works prior to commencing the construction of the houses, and it is clear to see that this is purely for their own financial benefit.

Several residents of the Mountain Road area stated in their submissions / objections to Cork County Council Planning File 25/4551 that they had/have not been approached by the applicant regarding sale of their land to facilitate the road widening, and that if or when they are approached in the future that **none of them would be willing to sell any of their land for this purpose or give their consent to any such works on their property.**

This issue of insufficient space was brought to the attention of the Planning Authority in the submission dated 17/04/2025 and they have failed to seek further information to clarify the position. It is noted that the Senior Planner's Report is silent on this matter. Since there is no evidence that the developer has permission to access sufficient land to construct the works in the manner proposed and no viable alternative has been investigated by the Planning Authority, the application is fatally flawed. The development cannot proceed without the road upgrade and consequently the decision to grant permission is inappropriate and should be reversed.

Furthermore, I would like to point out that the planning application 246418 for 39 houses to the front of the R611 was applied for on the 09/01/2025 and the Council is still seeking further information, yet the Mountain Road application for a development which is over nine times bigger was given full permission without any further information requested. This is extraordinary to say the least.

Whilst I understand that local authorities have some discretion in granting planning permission, it seems like a total farce that this particular planning application (after the third attempt at getting the correct paperwork in order) was granted subject to 59 conditions, While a lot of the conditions relate to required modifications to the information/drawings submitted with the application, the only condition that relates to the very valid concerns and gaps in information raised by the public is the condition that the applicant is appealing!

Why is it being fast-tracked without due process? Surely if the county council planners have come to the decision that 59 issues are of concern and need to be addressed, that should have been sufficient grounds for additional information being asked for.

There is a major lack of information with regards to the works on mountain road, such as road widths, footpaths to the south, car and pedestrian access while constructing and maintaining services especially when a significant number of residents are working from home. The original planning application was, and still is, in breach of the county development plan including Carrigaline [Objective CL-R-10]. I understand that such decisions are reached through a democratic process, so the glaring question is – where is the accountability for this decision-making and breach of democratic process by the planners in Cork County Council? The Senior Planner's report has ignored the question as to whether the non-compliance with Objective CL-R-10 is a Material Contravention of the Development Plan. Since the decision to grant permission to an application which materially contravenes the Development Plan can

only be made by the elected representatives, the failure to draw attention to it represents an attempt to by-pass this process.

Extracts from the Senior Planner's report:

Policy:

The Cork County Development Plan outlines an objective that access to this site should be from the R611 and mountain road but this proposal only proposed access form Mountain Road.

Traffic and Transport:

*The applicant proposes to upgrade the existing road network (Mountain Road, L-6495) Eastward to the junction of the Regional Road (R611). It is considered that these improvements are substantial and will provide significant benefit to the public in terms of access – vehicular, cycling and walking. **This creation of both a sustainable and vehicular link to the R611 is consistent with the policy objective of this subject site.***

This final sentence is both disingenuous and inaccurate. It is quite clearly not consistent with the policy objective for the site with respect to access, nor is it sustainable.

In the context of development, "sustainable" is defined (Google) as "*conserving an ecological balance by avoiding depletion of natural resources*".

The proposed upgrade of the road is arguably insufficient to accommodate existing traffic into the future, let alone the additional vehicular traffic from the proposed development. It therefore does not meet the basic premise of sustainability in that the work done and resources used will be wasted as reconstruction of the road is likely to be required within a short timescale. Neither does it make any allowance for planned future development in the area.

The safety of residents of Mountain Road during construction is absolutely paramount and central to this entire development project. This huge residential development will have a massive negative impact on the day-to-day lives of all residents in the Mountain Road area. Health and Safety **MUST** be prioritised before any form of construction commences on this site.

The traffic and transportation plan submitted by the developer is seriously flawed as a major junction less than a hundred metres from Mountain Road has been accidentally or deliberately omitted (This Junction with the mountain road is called Pipers Cross as it has been considered a staggered junction in practice). This has been raised in almost all of the 50+ objections / submissions to the final version of the planning application 25/4551. The traffic & transportation plan needs to be re-evaluated and done correctly by an **independent contractor/engineer/surveyor** who has no personal link to or professional relationship (past or present) with Cork County Council or the Applicant.

The surface water drainage assessment is also highly flawed, as was also pointed out in several submissions / objections by engineers, as it was carried out in the driest month of the year. Did the Applicant think this would go unnoticed?

Again, I must raise the issue of the developer's track record, which I also included in my submission/objection to Cork County Council Planning File 25/4551. I understand that one of the directors of Bridgewater Homes is/was previously a director in Rock Forest Homes who built *Kilmoney Woods*, a residential development (29 homes) in Mountain Road, located just opposite the entrance to the proposed new large-scale development in Mountain Road. Some of those houses were left unfinished for years, which drew squatters to the development, one of whom was later jailed. Is there any guarantee that this situation won't arise again, considering the proposed new large-scale development has more than 12 times the number of residential units than Kilmoney Woods has?

<https://www.irishtimes.com/news/crime-and-law/courts/squatter-jailed-for-contempt-over-refusal-to-leave-house-1.1609162>

The Mountain Road upgrade is a health and safety issue and must be completed before any construction works commence. Where is the motivation for such works to be delivered by the developer at the end of the 5-year construction phase once all the properties have been sold? Is that why they are appealing 4(a), so that if the crucial road upgrade can be kicked at least five years down the road, is the developer expecting some kind of miracle that all the relevant landowners will suddenly change their minds and sell the required land for the road widening? The developer is maintaining that he's doing the community and the council some sort of favour by doing the road upgrade, but this is entirely self-serving to support a very lucrative private development.

The Landowners in the Mountain Road, between The Monks/Wrenville section and the proposed single access point to the new development, have all stated clearly, categorically and emphatically that they are not willing to sell any land or consent to any works on their property, now or at any future date, in order to facilitate the road upgrade works that the Conty Council have stipulated must be completed before any construction commences.

To summarise, the entire application is flawed and is in breach of the county development plan which specifically includes Carrigaline [Objective CL-R-10]. The land required to complete such road upgrade works to Mountain Road is not available to the developer ('The Applicant') now or at any point in the future. I urge you to dismiss the appeal by The Applicant. It is paramount that condition 4(a) remains unchanged as it is a key provision for the safety of all residents of our quiet rural community in Mountain Road during this proposed construction project.



Niamh O'Connor

11 The Monks
Mountain Road
Carrigaline
Co Cork
P43 Y628

