

An
Bord
Pleanála

Observation on a Large-scale residential development Appeal: Form

Your details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Paul Griffin

(b) Address

6 The Monks, Kilmoney, Carrigaline, Co. Cork
P43 P782

Agent's details

2. Agent's details

If an agent is making your observation, please provide their details below. If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's address

Click or tap here to enter text.

Postal address for letters

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

You (the observer) at the
address in Part 1

☒

The agent at the address
in Part 2

☐

Details about the proposed development

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

(a) Planning authority

(for example: Ballytown City Council)

Cork County Council

(b) An Bord Pleanála appeal case number (if available)

(for example: ABP-300000-19)

LH04.322734

(c) Planning authority register reference number

(for example: 18/0123)

25/4551

(d) Location of proposed development

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

Mountain Road, Kilmoney, Carrigaline, Co Cork

Observation details

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

Observations amended to the end of this document

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

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

Fee

7. You **must** make sure that the correct **fee** is included with your observation. You can find out the correct fee to include in our [Fees and Charges Guide](#) on our website.

This document has been awarded a Plain English mark by NALA.

Last updated: August 2020



6, The Monks,
Piper's Cross,
Kilmoney,
Carrigaline
P43 P782

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

An Coimisiún Pleanála - Case reference: LH04.322734

Planning Application Reference Number: 25/4551

Applicant: Bridgewater Homes Ltd.

Description of Development: Large Scale Residential Development (LRD)

Location: Mountain Road, Carrigaline, Co. Cork

A Chara,

I wish to submit the following observations on the Large Scale Residential Development, as set out in Cork County Council Planning Application 254551 and An Coimisiún Pleanála - Case reference: LH04.322734 and would hope that they would be considered before the final decision is made.

Firstly, I wish to state that I fully support and endorse the appeal submitted by Simon Brewitt and other local residents in relation to this planning application.

I acknowledge that there is currently a great need for housing in Ireland. However, it needs to be planned and provided in considered manner, to avoid having a detrimental effect on existing housing in the area.

Observations:

1. Interaction with my boundary

Last year we were approached by the developer, Bridgewater Homes Ltd., in connection with removing our ditch bordering the Mountain Road, and replacing it with a stone wall of our choosing. We told them that we were not interested and **did not give our consent** to this, as the ditch is utilised by local wildlife such as foxes, hedgehogs, bats and other fauna and birds. On the *Proposed Site Plan 003E* (see appendix for extract) submitted as part of the planning application, the upgrade to the Mountain Road is to the northern

side of the existing road and is supplemented with letters of landowner's consent for that side of the road. This plan clearly shows that there is no intention to affect my boundary.

There appears to be a contradiction in the Planning Application, however, as one part of the plan has no interaction with my boundary while another part proposes the removal of trees from my boundary. The mature ash tree in my ditch is referenced in the *Tree Survey* and *Tree Protection Plan* drawings as T30 (along with T31 and T32 in the Monks front boundary, see appendix for extract of report). The *Arboricultural Impact Assessment* prepared by Arbor-Care (Ltd) for Bridgewater Construction, and submitted as part of the planning application, refers to these trees as being in 'good condition' and recommends retaining them. However, the *Landscape Plans* highlights them as "to be removed", along with 52 other trees, many on the southern side of the road. **Consent has not been sought nor given for the removal of these trees.** No consideration has been given in the planning application as to how any tree or hedgerow removals along the Mountain Road, outside of the development site itself, are to be made good afterwards. **If this removal is proposed, it would seriously reduce the current natural screening for our garden and have a detrimental impact on our privacy.**

2. Road Widths

Point No. 8 of the Cork County Council LRD Opinion looks for clarification on the proposed works on the Mountain Road. **This has not been provided in the planning application.**

The proposed carriageway width of 5.5m is the **minimum** required by the *Design Manual for Urban Roads and Streets (2019)* (DMURS) for Arterial and Link Streets with mostly car traffic, with the **preferred** value being 6 to 6.5m. When you consider that this road is utilised by the rigid heavy goods vehicles (Gerard Healy Aggregates) and large agricultural vehicles, particularly during harvest season, a continuous width of 6m should be a minimum, particularly when you consider that the Architectural Design Statement (p31) for the development proposes a 6m road width for the Primary Local Streets inside the development itself.

The 5.5m carriageway and 3m shared pedestrian and cycle path proposed in the Engineering Services Report, and shown on the road layout plans, makes **no allowance for a verge** being provided next to the hedgerow. The *Proposed Road Details* drawing (24011-OSL-XX-90-XX-DR-C-9010) shows a 'typical cross-section' of the proposed entrance road which has a verge at each side. DMURS looks for a verge of 1.5 to 2m on Arterial and Link roads to provide a buffer between the road and the hedgerow, allowing for seasonal growth of vegetation. There is no cross-sectional drawing of the proposed

upgrade to the Mountain Road or no other details provided as to how this is to be achieved. This is a **serious omission** as it forms an integral part of this application.

The existing road width of the Mountain Road between the Monks and the R611 is 6.8m. It is intended to reduce this down to 5.5m, which will have a **negative impact** on what is already a tight turn from the R611 for traffic approaching from the south, particularly when you consider the agricultural machinery and HGVs using the road. **No design has been carried out in the planning submission for this change.**

3. **Upgrade of Mountain Road**

Point No. 8 of the Cork County Council LRD Opinion also looks for a detailed *Construction Traffic Management Plan (CTMP)* 'that describes how services are to be installed along the existing roadway heading east from the development whilst maintaining access to existing properties'. Despite their response stating that the CTMP includes 'site specific details on the proposed strategy to maintain access for all the existing properties along Mountain Road during the proposed upgrade works and services works', **no details are provided.** The intention is to lay a new 150mm diameter water main, a new 300 diameter foul sewer and a new 225mm diameter surface water sewer along the Mountain Road while maintaining existing sewer and water systems. This is to be achieved while maintaining access to the existing residences and the existing hedgerow to the southern side. There is no specific information on how this is to be done.

CTMP Section 6.9 mentions the possibility of road closures, but Section 6.6 states access will be maintained for Emergency Services, even though they are aware that the alternative to the west is unsuitable. **No detail is provided in the plan as to how do they intend to achieve this.**

The fact that the Developers have made a submission to an appeal to An Bord Pleanála appealing the condition No. 4, that the upgrade of the Mountain Road would take place prior to any commencement of work for the development, does not fill me with confidence that it would ever be carried out or that the developers have fully considered the logistics of carrying out the development.

4. **Access to proposed LRD development**

Objective No. CL-R-10 states that the medium density residential development should be accessed '*from the R611 and the Mountain Road*'. It is disingenuous to suggest, as they do in Section 02 (Page 24) of the Architectural Design Statement, that it is sufficient to have access to the site from the R611 *via* the Mountain Road. Current best practice in planning would require large scale residential developments to have multiple access points to ensure permeability and accessibility, particularly to allow for alternative access routes for emergency services.

The DMURS Statement of Compliance purports to show how the development follows the guidance in the *Design Manual for Urban Roads and Streets* yet **fails to discuss** the importance of permeability and connectivity in urban design and the need for multiple access points to enhance network resilience, contained in the design manual. Indeed, the Urban Design Manual clearly states when discussing access routes that *'too few and the routes will be over-trafficked which can create nuisance to nearby residents.'*

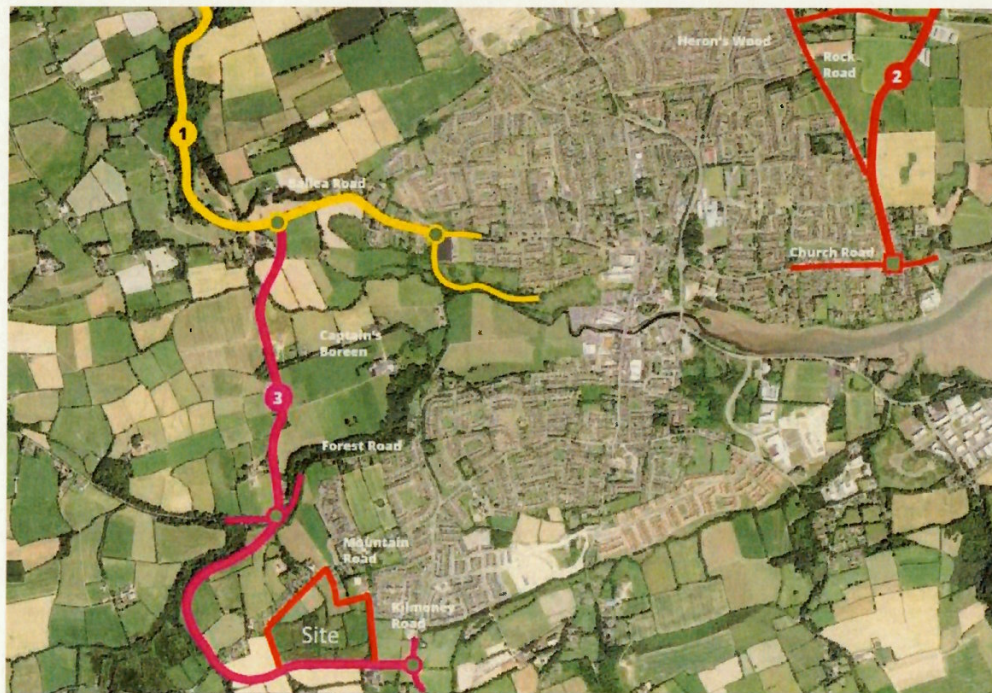
The Planning Application looks to circumnavigate this good planning requirement by showing 'possible' future connections, but when these are looked at in more detail, they appear to be **unlikely to ever materialise**. One 'possible' future connection is shown on the drawings, along with the shared pedestrian and cycle path, through a currently proposed development and on to the R611. But **no mention** is made of this proposed vehicular access on the current Planning Application (24/6418) for this development, although the shared pedestrian and cycle path is shown. Indeed, the Surface Water Management Plan and accompanying drawings attached to Planning Application 25/4551 shows an attenuation pond at the location of the possible future connection. Even if this road was to be built, it could not be considered to provide an adequate alternative access route to a large-scale residential development.

The other 'possible' future connection is to a connecting road proposed in the Development Plan, CL-U-04, but this road is unlikely to ever be built, as there is a difference in elevation of 30m between the Mountain Road and the Forest Road at this location (a horizontal distance of only 330m) giving a gradient over 9%, which is well over the desirable gradient of 5% set out by the Transport Infrastructure Ireland (TII) standards as in the *Design Manual for Roads and Bridges* for rural link roads. Indeed, the *Carrigaline Transportation and Public Realm Enhancement Plan* (TPREP) acknowledges this by stating that providing this route would be costly with potential environmental constraints.

The current proposal as it stands without an alternative access road is a **material contravention** of the County Development Plan. A way to resolve this problem would be to provide the main development access to the south of the site and directly onto the R611. This alternative that would tie in with the TPREP, and consequently the County Development Plan, and could form part of the proposed Southern Outer Distributor Road, which is planned to run to the south of the proposed development (See below extract from the Carrigaline TPREP).

It would also remove the construction traffic from the Mountain Road and allow for a viable alternative access to the existing dwellings, should road closures be necessary. It

would allow for permanent alternative access to the site and allow the Mountain Road to be developed as part of the Primary Pedestrian and Cycle Network, which is in line with the recommendations of the Carrigaline TPREP. It should be noted that the TPREP specifically states that it is not intended to connect the Mountain Road to the Southern Distributor Road as it *'not capable of carrying any additional traffic'*.



(Section 4 Transportation Network p62 Carrigaline TPREP, amended to include the site location outlined in red)

5. Traffic Congestion

The Traffic and Transportation Assessment submitted with the Planning Application would appear to have some gross under-estimations of the potential traffic volume growth. The assessment of the junction of the Mountain Road with the R611 considers it as a T-Junction and completely discounts any traffic entering or exiting the Upper Kilmoney Road. This would seem unreasonable, as this junction is a staggered crossroads known as Piper's Cross and both roads would need to be considered, as they form an integral part of this junction.

The calculated trips generated in the Traffic and Transport Assessment would appear to be greatly underestimated and in variance with the Carrigaline TPREP, which has almost 60% of households with two or more cars. TPREP also states that 75% of trips are car based and with a resident to job ratio of 5:1, a large percentage of new residents on the south side of Carrigaline will be sent through an already congested town. TPREP

acknowledges that the '*infrastructure (is) close to capacity already*' (TPREP Baseline Report Section 7.4.3) and that there is limited potential for development without additional linkages.

I would suggest that southern development of Carrigaline is already beyond the capacity of the existing road network with the substantial developments in Castle Heights and Forrest Hill. The newly constructed relief road (Pottery Road) has helped in the short term; however, this was to take traffic off Main Street and not designed to take additional traffic from the south of Carrigaline, as this traffic is still filtered through the town. This new relief road will also have to deal with the future traffic from the apartment blocks proposed next to it. Many commuters seeking to avoid the current traffic congestion in Carrigaline use Bóthar Glas and on to the Ballea Road, but this route is already unsuitable for the volume of traffic it takes.

It was acknowledged by the Councillors at the Carrigaline Municipal District meeting on 18th March 2025 that there is a '*lack of infrastructure in Carrigaline, in light of the huge amount of residential development that has taken place in recent years*' and that '*there is a compelling case to be made that **there should be no more housing going ahead in Carrigaline** until adequate infrastructure is in place*'.

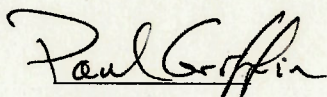
To summarise my observations:

1. I have not given consent to the removal of trees or the disturbance of the ditch at my boundary with the Mountain Road.
2. The proposed roads upgrade to the Mountain Road is insufficient and not compliant with the *Design Manual for Urban Roads and Streets* and the arterial roads are proposed to be narrower than the roads within the development.
3. There is ambiguity as to what is to happen with the south side of the Mountain Road and no details are provided as to how the existing foliage on Mountain Road is to be replaced and made good afterwards.
4. The proposed single access route to the development is a **material contravention** of the County Development Plan and viable alternatives are not considered.
5. The traffic assessment is flawed and grossly underestimated the detrimental effects this development will have to the local area.

While I have no objection to the development of more housing in Carrigaline, I firmly believe that the developers are relying on the current social demand and political pressure for housing in order to push through this development, without adequately planning or providing the necessary infrastructure. The proposal glosses over details that should be properly thought out and planned before a large development like this

could take place. Thank you for taking the time to read this submission and I would respectfully ask that this development would not be allowed go ahead until the issues highlighted in this submission are resolved.

Mise le meas,

A handwritten signature in black ink, appearing to read 'Paul Griffin', with a stylized, cursive script.

Paul Griffin

BE CEng MIEI

Chartered Engineer