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**LARGE RESIDENTIAL  
DEVELOPMENT  
CORRESPONDENCE FORM**

Appeal No: ABP 322734-25

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<b>Amendments/Comments</b>	<u>applicant's response to further appeal</u>

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Daire

**L** ra Grady Lawlor

**From:** Cora Savage <csavage@mhplanning.ie>  
**Sent:** Wednesday 16 July 2025 15:03  
**To:** Appeals2  
**Subject:** ABP Ref. ABP-322734-25  
**Attachments:** LTR\_250714\_Response to 3rd Party Appeal\_Final.pdf

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Good Afternoon,

We act on behalf of the applicant Bridgewater Homes Limited and wish to respond to the third party appeals lodged by Simon Brewitt of Tiaracht, Mountain Road, Carrigaline, Co. Cork on behalf of the local residents of Mountain Road, Kilmoney Woods, Wheatfields and The Monks, Carrigaline, Co. Cork and Oliver Power of Dun na Sead, Mountain Road, Carrigaline, Co. Cork against Cork County Councils notification of a decision to grant planning permission for the following Large Scale Residential Development comprising the demolition of existing structures on site and the construction of 362 no. residential units, a creche, community room and café and all associated ancillary development works at Mountain Road, Kilmoney (Townland), Carrigaline, Co. Cork (Cork County Council Ref. No. 25/4551).

We trust that this submission will be considered in the Boards assessment of the proposed development. Please contact the undersigned if you require any further information.

Kind Regards,  
Cora

Cora Savage  
Senior Planning Consultant  
McCutcheon Halley  
CHARTERED PLANNING CONSULTANTS  
Mobile: +353 (0)86 457 0183

[www.mhplanning.ie](http://www.mhplanning.ie)

**Cork**  
6 Joyce House, Barrack Square,  
Ballincollig, Cork,  
P31 YX97  
Tel: +353 (0)21 420 8710

**Dublin**  
4<sup>th</sup> Floor, Kreston House,  
Arran Court, Arran Quay,  
Dublin 7, D07 K271  
Tel: +353 (0)1 804 4477



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Dear Sirs:

Enclosed

The enclosed is a copy of the report of the committee on the subject of the proposed new building for the University of California. The report is a very thorough and complete one, and I believe it will be of great value to you. It contains a detailed description of the proposed building, and also a comparison of the proposed building with the existing buildings on the campus. I believe that the proposed building is a very fine one, and that it will be a great addition to the campus.

We must not lose sight of the fact that the proposed building is a very large one, and that it will be a great addition to the campus. It will be a very fine building, and it will be a great addition to the campus.

Very truly yours,

John D. ...



Very truly yours,  
John D. ...

Enclosed is a copy of the report of the committee on the subject of the proposed new building for the University of California. The report is a very thorough and complete one, and I believe it will be of great value to you. It contains a detailed description of the proposed building, and also a comparison of the proposed building with the existing buildings on the campus. I believe that the proposed building is a very fine one, and that it will be a great addition to the campus.



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

16<sup>th</sup> July 2025

**Re: An Coimisiún Pleanála Ref. ABP-322734-25**

**Response to third party appeal against Cork County Councils decision to grant permission for the following Large Scale Residential Development comprising the demolition of existing structures on site and the construction of 362 no. residential units, a creche, community room and café and all associated ancillary development works at Mountain Road, Kilmoney (Townland), Carrigaline, Co. Cork.**

Dear Sir/Madam,

We act on behalf of the applicant Bridgewater Homes Limited and wish to respond to the third party appeals lodged by Simon Brewitt of Tiaracht, Mountain Road, Carrigaline, Co. Cork on behalf of the local residents of Mountain Road, Kilmoney Woods, Wheatfields and The Monks, Carrigaline, Co. Cork and Oliver Power of Dun na Sead, Mountain Road, Carrigaline, Co. Cork against Cork County Councils notification of a decision to grant planning permission for the following Large Scale Residential Development comprising the demolition of existing structures on site and the construction of 362 no. residential units, a creche, community room and café and all associated ancillary development works at Mountain Road, Kilmoney (Townland), Carrigaline, Co. Cork (Cork County Council Ref. No. 25/4551).

An Coimisiún Pleanála (ACP) will note that the grounds of appeal repeat many of the issues raised by the appellants during the planning application process and have little regard to the balanced assessment of these concerns carried out by the Planning Authority. It is submitted that all issues for the LRD application were very carefully considered and addressed by the planning authority in making their decision to grant permission.

In considering this appeal, it is important to point out that the application was accompanied by a detailed and comprehensive set of supporting plans/material (with a strong focus on environmental and traffic assessment) including an Environmental Impact Assessment Report (EIAR), Traffic and Transportation Assessment, Mobility Management Plan, Quality Audit Report and Road Safety Audit and Construction Traffic Management Plan.

The Council's decision to grant permission was the culmination of a detailed assessment of all planning matters relevant to the development. The final decision underlines that all identified issues have been addressed. We submit that all the raised grounds of appeal were adequately dealt with by Cork County Council in their assessment of the proposed development and this is reiterated in the Senior Planners report dated May 26<sup>th</sup> which states *"the proposed development with a density of 35.5 units per hectare is considered acceptable having regard to the location of the proposed site on the periphery of Carrigaline."*

Despite our reservations regarding the recurring nature of the issues raised in the third-party appeal, we have summarised the items raised in the appeal below and will respond as follows:



1. The proposed development is fully in accordance with Government Policy and the Cork County Development Plan 2022 and does not materially contravene the plan.
2. The proposed development has been designed in accordance with the Design Manual for Urban Roads and Streets and will greatly improve pedestrian/cycle safety and connectivity.
3. The proposed development will not give rise to any adverse traffic impacts.
4. The proposed development will not seriously injure the residential amenities of properties in the vicinity and will enhance Carrigaline as a whole by providing additional residential units in the town, where there is an acute need for housing.
5. The planning application was accompanied by a very comprehensive list of supporting material which was prepared to a very high standard and contains all the information required by the planning authority.

Our response to the grounds of appeal is outlined below.

**1. The proposed development is fully in accordance with National Policy and the Cork County Development Plan 2022**

The appeal by Simon Brewitt on behalf of the local residents claims that the proposed development "is considered to be a Material Contravention of the Development Plan objective for the site." He specifically refers to the development being a material contravention of zoning objective CL-R-10 as the proposal "omits access to the development site for the R611." He goes on to state that the proposed development is "clearly at variance with the wording and the intent of Objective CL-R-10." We strongly disagree with these statements. The County Development Plan (CDP) outlines the objective for these lands, zoned for new residential development and states the following in relation to Objective CL-R-10:

*"Medium B density residential development to include a mix of house types accompanied with appropriate landscaping. Access to the site will be from the R611 and the Mountain Road. Specific arrangements will be made for the provision and construction of the link road (CL-U-07), the southern relief road, amenity walk (CLU-08)"*

In addition to the objective for Medium B residential development on the subject site, the objective also requires for arrangements to be put in place for the provision and construction of a section of the link road (CL-U-07), southern relief road and a section of the amenity walk (CL-U-08). The appellant does not raise any issues regarding compliance with these aspects of the objective and focuses solely on the reference to access from the R611/Mountain Road included in the CL-R-10 objective.

The CL-U-07 and CL-U-08 objectives read as follows:

**CL-U-07** "Link road between CL-U-04 and the Southern Relief Road."

**CL-U-08** "Provide pedestrian amenity walk from Mountain road east to join Greenway on the Crosshaven road. Future upgrades or extensions to the route will be considered/ designed/developed taking account of the birds that use the estuary as well as other values including landscape and biodiversity values."



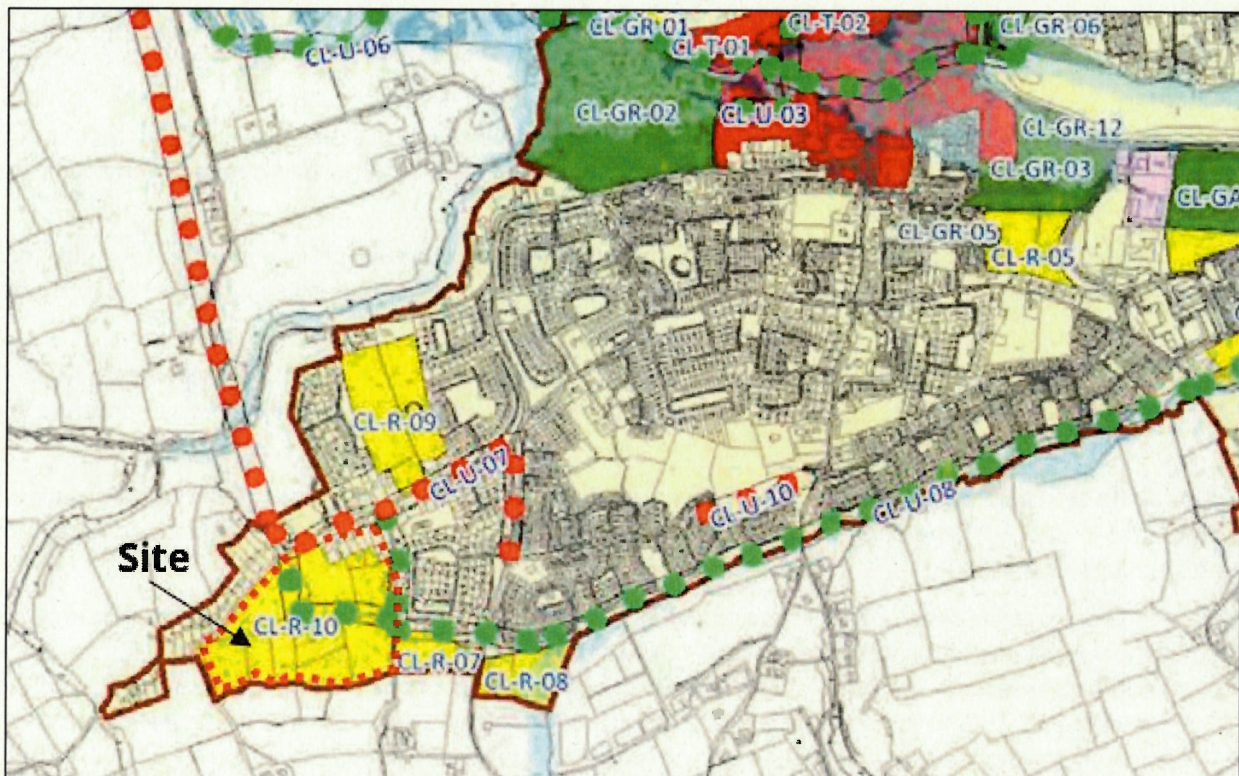


Fig 1: Zoning objective for subject site as identified by the CDP zoning maps.

The appeal by Simon Brewitt claims that *"the site is required to have two vehicular points, one from the R611 and one from the Mountain Road"* and Oliver Power states that *"the requirement to have a second entrance to the R611 has been dropped."* This is not the case. Objective CL-R-10 states that *"access to the site will be from the R611 and the Mountain Road."* The objective does not state that there has to be a direct access point on to each road, nor does it state that there has to be a direct vehicular access on to the R611.

It is unsurprising that the objective does not require a direct access point from each road as the subject site has no direct frontage onto or direct connection to the R611, therefore vehicular access can only be onto the R611 via Mountain Road. This is reinforced by objective CL-U-07, which requires a link road between the southern and western relief roads and runs along the R611 and Mountain Road and does not traverse the subject site.

As can be seen from the drawings submitted with the LRD application, the development of the subject site includes provision for pedestrian and cycle connectivity in accordance with objective CL-U-08 and includes significant improvements to Mountain Road which will deliver significant sections of the CL-U-07 (road) objective and is therefore fully compliant with Objective CL-R-10.

The appellants' claims therefore that the proposed development is a "material contravention" as it does not have a direct vehicular access on to the R611, does not stand up to objective scrutiny.

Planning law has established that a material contravention only occurs when a development materially or significantly deviates from the objectives outlined in a development plan i.e. the deviation must be considered "material," or a substantial departure from the plan's objectives.



Contrary to the appellants' assertion that the development is a material contravention of the CDP, the proposed development is absolutely consistent with the CDP, including the three principal CDP objectives that pertain to the site:

**CL-R-10:** The scheme is consistent with the Medium B residential density and provides access to the site to the R611 via Mountain Road with very significant improvements to vehicular, cycle and pedestrian access along Mountain Road.

**CL-U-07:** The development includes a significant section of the improvements (vehicular, cycle and pedestrian access) between CL-U-04 and the Southern Relief Road i.e. the section along Mountain Road Link road.

**CL-U-08:** The proposed development provides a significant section of the greenway/pedestrian amenity walk from Mountain road through the site, aligning with the pedestrian amenity walk on the adjoining site under 24/6418.

It is submitted that the proposed development does not materially contravene the development plan. In fact, the proposed development is not only consistent with the CDP, the development **delivers the objectives of the CDP.**

In considering this appeal and the question around material contravention, it is important to point out that the appellants' interpretation of CL-R-10 was not shared by Cork County Council and the Senior Planner who assessed the proposed development in the context of the CDP objective and noted in their report dated May 26<sup>th</sup> that *"this creation of both a sustainable and vehicular link to the R611 is consistent with the policy objective of this subject site."* They go on to state that *"provision is made for a future pedestrian pedestrian/cycling access to the CL-R07 lands which will be an additional linkage to the R611."*

It is also important to point out that the Council did not seek a vehicular connection to the adjoining residential development proposed under 24/6418 (currently at further information stage) on the adjoining CL-R-07 lands, which would have provided a direct vehicular link/connection from the CL-R-10 site to the R611. Therefore the Council did not share the appellant's view that a vehicular connection was appropriate or required under the CL-R-10 objective and instead sought a cycle/pedestrian connection only with the adjoining 24/6418 development.

While it is the applicants' and Cork County Councils' position that the proposed development is **not a material contravention** of the 2022 Cork County Development Plan, in the event that the Coimisiún does not agree with this position, it is submitted that planning permission should still be granted in accordance with section 37(2)(a) of the 2000 Planning and Development Act, as amended ('the PDA'), on the basis that the proposed development:

- Will deliver much needed housing on zoned residential lands in an area of Metropolitan Cork where there is an acute housing need.
- Will deliver significant infrastructural improvements to the area including:
  - A significant proportion of improvements (vehicular, cycle and pedestrian access) along the entire section of Mountain Road between the site and the R611, in accordance with objectives CL-U-07 and CL-R-10 of the CDP.
  - A significant section of the greenway amenity will be provided in accordance with objectives CL-R-10 and CL-U-08 of the CDP.
- Will provide significant amenities and social/community infrastructure including a 102-no. place childcare facility.



Therefore, in the event that the Coimisiún does not agree with our position (and Cork County Council's position) in relation to material contravention, we would urge ACP to grant permission in accordance with section 37(2)(a) of the PDA for the reasons outlined above and the significant benefits associated with the proposed development.

The appellants have also referenced the Carrigaline Transportation and Public Realm Enhancement plan (TPREP) and alluded to non-compliance with the plan as they believe it requires two access points. Again, we disagree with this. As can be seen from Figure 2 below the TPREP clearly indicates that vehicular access to the subject site is to be from Mountain Road to the north only with pedestrian and cycle connectivity from the east, both of which have been provided for within the proposed development.

In addition to the above, as the 'Southwestern outer relief road' is indicated to run to the south of the proposed scheme and provision has been made to allow future access from the development onto this road. There are a number of streets within the scheme which run perpendicular to the southern boundary which could be easily extended to provide access if needed. The proposed scheme is, therefore, fully compliant with the Carrigaline TPREP.

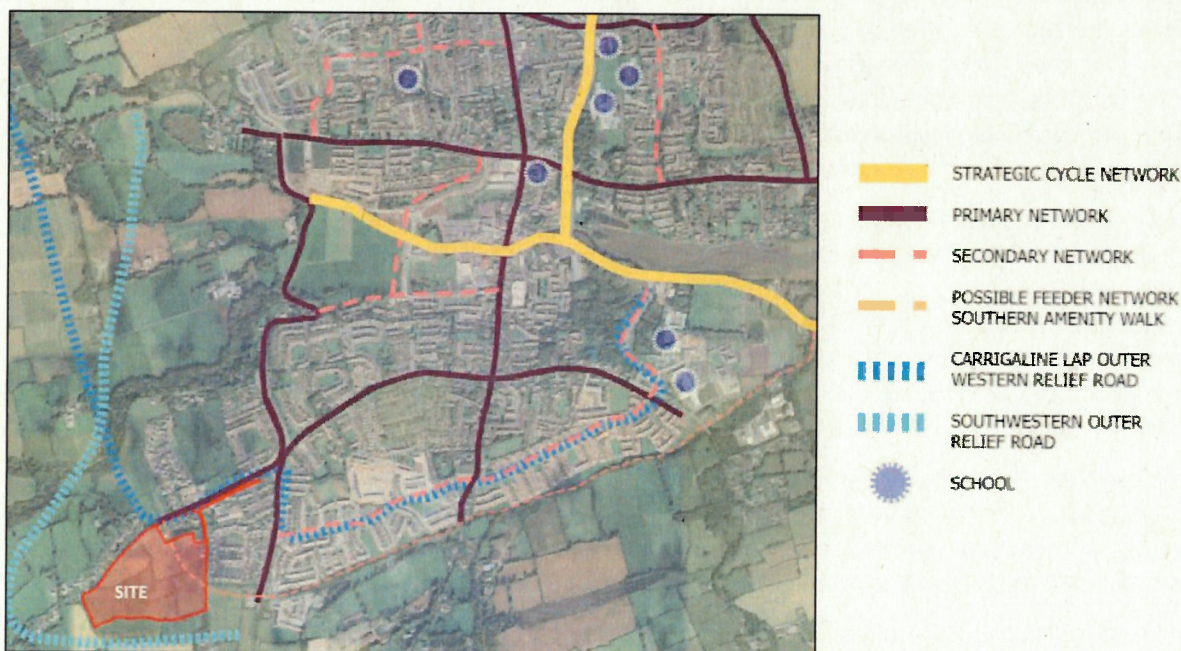


Fig 2: Extract from Carrigaline Transportation and Public Realm Enhancement plan.

In considering this appeal we would ask ACP to have particular regard to the very significant efforts that the applicant has gone to deliver the objectives of the plan, including the sustainable transport improvements to Mountain Road which required agreements from multiple residents/landowners.

The appellants' claims that the proposed development is a "material contravention" as it does not have a direct vehicular access on to the R611, is unsubstantiated; was clearly not supported by Cork County Council in their assessment of the application; and simply does not stand up to an objective assessment of the policies/objectives of the CDP.

## 2. The proposed development has been designed in accordance with the Design Manual for Urban Roads and Streets and will greatly improve pedestrian/cycle safety and connectivity

The appeal by Simon Brewitt claims that the proposed development is not compliant with the Design Manual for Urban Roads and Streets (DMURS) Guidelines and the Compact Settlement Guidelines as the



scheme *"represents poor urban design, provides poor connectivity and permeability and constitutes a public safety risk"* and *"the Mountain Road Upgrade proposal is not in accordance with national design standards (DMURS) in terms of road width."* We strongly disagree with these statements.

A Statement of Consistency (SoC) was submitted with the application which provided a comprehensive assessment of the proposed developments' consistency with the relevant planning policy documents at national, regional and local levels. The SoC concluded that the proposed development is fully consistent with the general and specific objectives of the national, regional and local policy documents. This conclusion was fully supported by Cork County Council.

A DMURS Statement of Compliance was also prepared by OSL Butler Consulting Engineers which outlines the approach taken in the design of the development and how it follows the Guidance contained in DMURS both internally within the scheme and along Mountain Road.

The principles of DMURS have been incorporated into the design of the roads, creating a defined hierarchy which will help to improve legibility through the site. The roads vary in width commensurate with the volumes of vehicular traffic and are fully compliant with DMURS. The variety of width and surface finishes are recommended in order to prioritise pedestrian movement. The variety encourages drivers to monitor their surroundings, and to be alert for pedestrians and cyclists. All routes are overlooked where possible, helping to create a safe environment with passive surveillance. The inclusion of a public lighting design by Molloy Consulting Engineers Ltd. along all main routes will also ensure that routes are usable throughout the day and at night if required.

The vehicular road/street layout has been designed to passively control traffic movement and speed as required by DMURS. Every effort has been made to maximise the free movement of pedestrians and cyclists by minimising barriers and facilitating desire lines. Cul-de-sacs have been minimised in the development with pathways included to allow pedestrian and cyclist movement between each residential street. The design of the proposed Mountain Road upgrade has also been designed in accordance with the relevant road standards including all vertical and horizontal road alignments independently audited as part of the planning submission.

The appeal by Simon Brewitt goes on to state that the proposed width of the Mountain Road upgrade is not compliant with DMURS and states that *"the absence of a commitment to design the road in accordance with DMURS, the proposed width of the upgraded road is not sufficient to accommodate the existing traffic or that which will arise as a result of the development."*

The existing Mountain Road varies in width, with the majority of the length of road having a width of **less than 4.4m wide, with no pedestrian or cycle provisions**. The increase in width for Mountain Road to 5.5m is in accordance with DMURS recommendations for roads of this type (local road) and was deemed acceptable by Cork County Council and will be a substantial improvement with respect to the existing road.

The appellant goes on to state that *"a road width of 6.0m would therefore be required on the Mountain Road to accommodate the proposed development, as recommended by DMURS"* as *"a road width of 5.5m width as proposed by the applicant is simply too narrow to accommodate larger vehicles and particularly the additional HGV traffic during construction."* This is not the case. An autotrack assessment of large vehicles demonstrates that a 5.5m road width is appropriate without any of the vehicles being required to mount roadside kerbs.



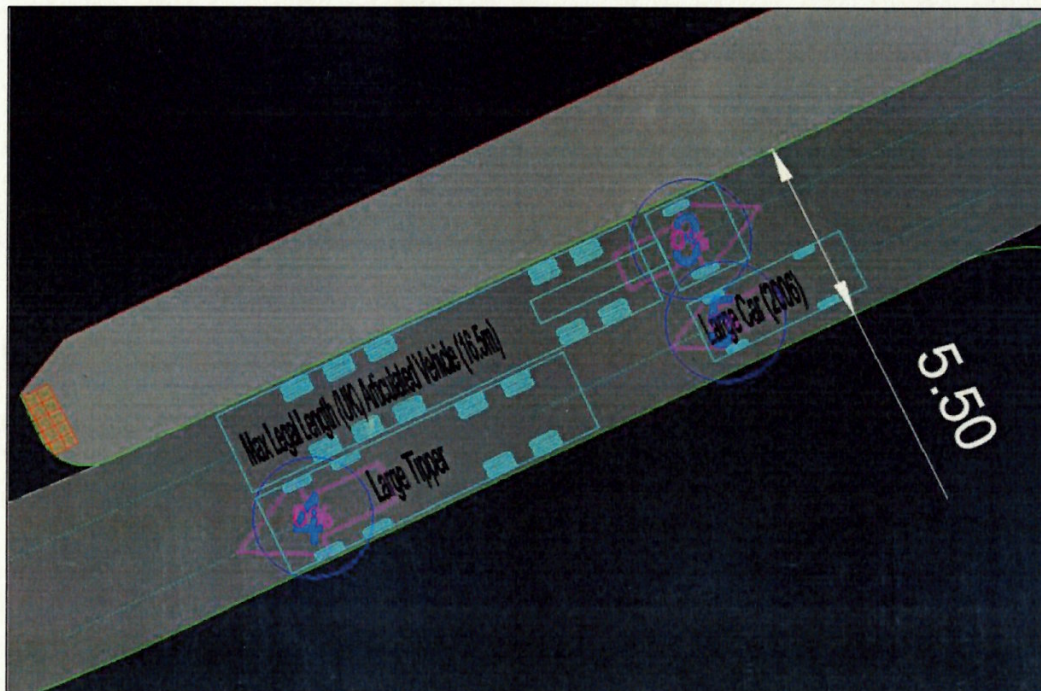


Fig 3: Autotrack of Mountain Road Upgrade showing two large vehicles comfortably passing.

The photographic evidence provided by the appellant of a large agricultural vehicle travelling along Mountain Road proves that there is a need for the carriageway to be upgraded as proposed in the 25/4551 planning application. The section of road where the photograph is taken is approximately 3.9m wide. The proposed upgrade will increase the road width to 5.5m – an additional width of 1.6m of carriageway created to allow larger vehicles to pass safely.

In considering this appeal, it is also important to point out that the existing Mountain Road has no facility/provision for pedestrians and thus the proposal for providing a 3m wide shared pedestrian and cycle facility along the entire section of Mountain Road between the site and the R611, is a substantial improvement with regard to pedestrian/cycle safety and connectivity.

The appeal by Simon Brewitt goes on to state that *"the current proposal has a single main access and while it does allow for possible future pedestrian/cycling it is far from the highly permeable and connected concept envisaged in urban design best practice."* The permeability of the development has been carefully considered both within the scheme, by ensuring the internal footpaths link the different areas and make the site accessible to all, and externally by connecting to the existing and proposed developments at a number of locations.

Pedestrian entry and egress to the overall development site is via the main vehicular entrance and the dedicated pedestrian/cyclist only entrance located along the eastern boundary of the site. The points tie into the existing paths within the wider area including the adjoining residential development proposed under 24/6418. In the wider urban context, connectivity focuses on the accessibility to the wider Carrigaline area. There are undeveloped lands to the south and west of the site. In order to allow for the future expansion of residential development, care has been taken to position pedestrian and vehicular routes to allow for maximum permeability.

As part of this response, an additional report has been prepared by MHL Consulting Engineers which demonstrates that the Mountain Road upgrade is fully compliant with DMURS (see Appendix 1),



especially in relation to carriageway widths (section 4.4 of DMURS) and the vertical and horizontal design parameters which adhere to Table 4.3 of DMURS. The report by MHL also includes communication dated 15/10/2024, with the Council's Senior Engineer, (Regional and Local Roads Design Office), which outlines the consultation and agreement with the Council in relation to the 5.5m carriageway and 3m shared pedestrian/cycle facility (see Appendix 1).

There is no doubt whatsoever that the permitted scheme, especially the Mountain Road upgrade, is fully in accordance with all relevant guidance documents and codes of practice including DMURS.

### **3. The proposed development will not give rise to any adverse traffic impacts**

In their appeal the appellants' state that *"there is only one entrance which will not cope with the traffic that will be generated," "the junction where traffic enters/exits the Mountain Road from the R611 is inadequate to handle the proposed traffic increase" and "the absence of a second access will result in a large increase in traffic on the Mountain Road, which will have impacts on amenity of local residents, as well as causing congestion in surrounding areas which will impede public transport."*

We do not agree with these assertions. As part of the planning application submission, a comprehensive Traffic and Transportation Assessment (TTA) by MHL Consulting Engineers was submitted with the application. The TTA assumed a robust development trip generation and concluded that the proposed development is appropriate and that *"all modelled junctions are to operate within capacity up to and including the year 2041 for all design scenarios."*

With the modal split targets proposed in the Cork County Council Development Plan 2022-2028 achieved, all junctions analysed would be within an acceptable design threshold in the design year 2041 with the proposed development and other large-scale developments in the area in operation. The TTA was deemed acceptable by Cork County Council who concluded that they *"foresee no issues in relation to congestion."*

The appeal by Simon Brewitt claims that the proposed development will have *"serious consequences for sustainable transport provision"* as the scheme will *"increase the risk of disruption to the bus services."* He goes on to state that *"the lack of a through route would prevent the possible future extension of the existing public transport loop into the new residential area."* This is not the case and clearly disregards the submitted Mobility Management Plan (MMP) prepared by MHL Consulting Engineers and the significant sustainable transport infrastructure included in the proposed development.

As outlined in the MMP, there is an existing bus stop located approximately a 10 minute walk to the east of the site (see Figure 4) and the NTA's design for the Cork Metropolitan Bus Network includes a number of new high frequency bus routes which will serve the area.

Contrary to what the appellant claims, none of these routes are proposed as a loop through the subject site. All the proposed new routes are situated on the R611 and within easy access following the sustainable transport measures included under 25/4551. The pedestrian and cycle connections to the R611 included in the proposed scheme will provide direct access to these new routes.



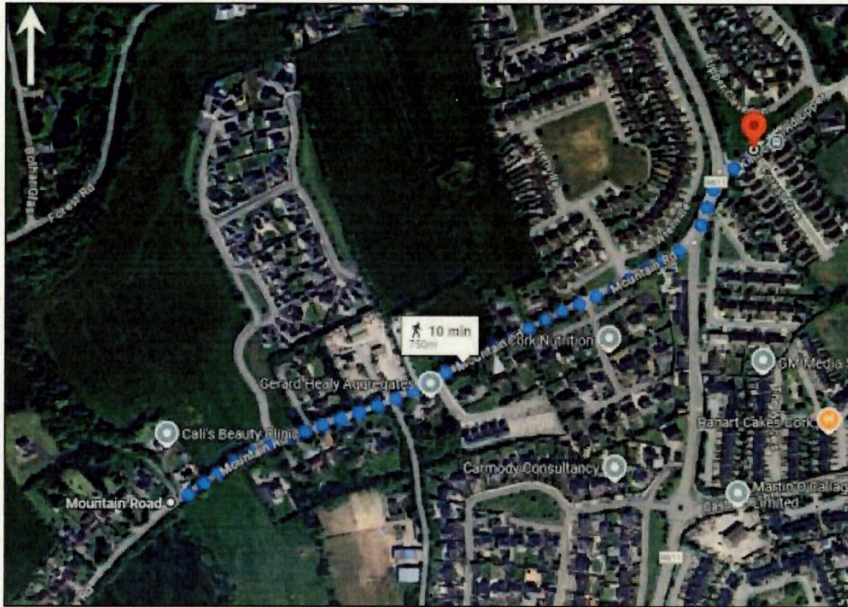


Fig 4: Distance from subject site to bus stop on Kilmoney Road Upper (Route 220).

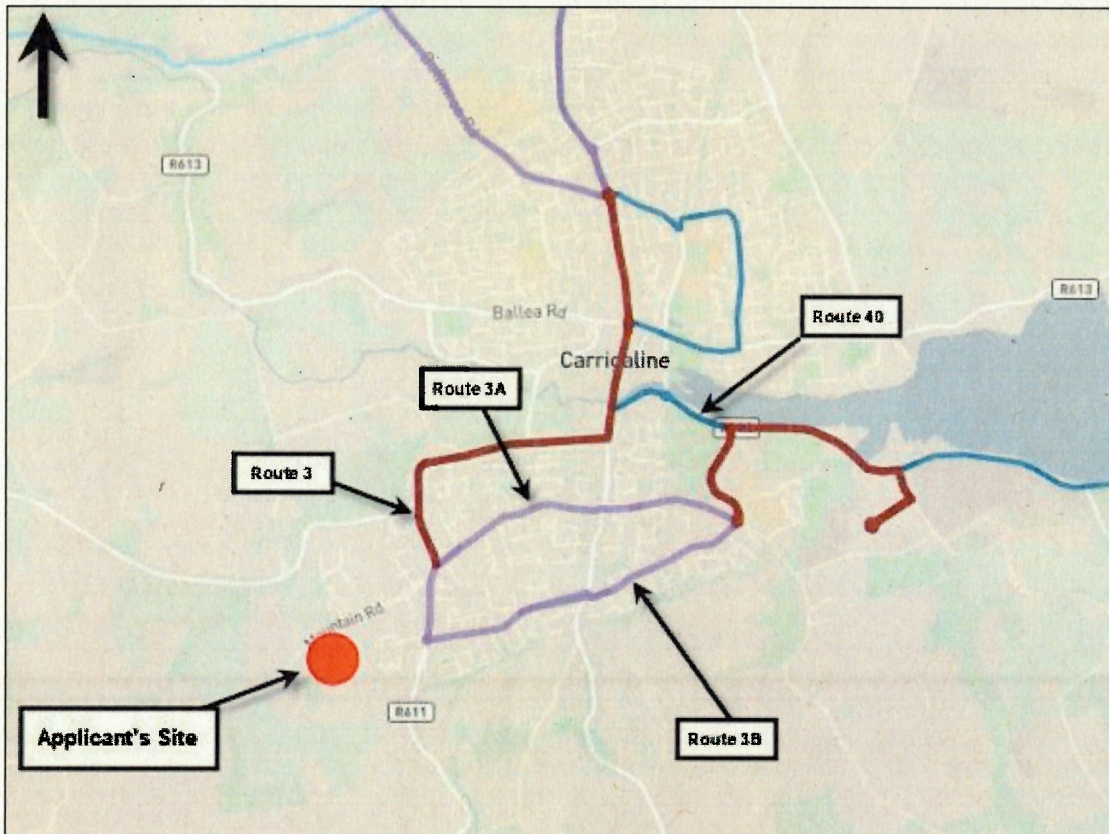


Fig 5: New bus routes proposed by the NTA in the Cork Metropolitan Bus Network.



As demonstrated in the TTA there will be no impact on the junctions within the vicinity of the site as a result of the proposed development so therefore there will be no disruption to either the existing or future bus routes.

In conclusion, it is clear that this development has been carefully considered in terms of traffic impact and sustainable transport provision. In addition to the above, as part of this appeal response, a further report has been prepared by MHL consulting engineers and is included in Appendix 2 for ACP's consideration.

**4. The proposed development will not seriously injure the residential amenities of properties in the vicinity and will enhance Carrigaline as a whole by providing additional residential units in the town, where there is an acute need for housing**

The appellants claim that the proposed development will *"cause serious injury to the residential amenity of the area."* Right from the outset and to ensure that there would not be a negative impact on the residential amenities of the area, the proposed development was very carefully conceived and based on a comprehensive and robust appraisal to ensure that the scheme would be delivered and managed to a very high standard in order to protect the residential amenities of the area and to ensure the provision of additional amenities for both future and existing residents.

The appeal by Oliver Power claims that *"the current proposed exit will have vehicle headlights shining into front windows, and fumes and noise pollution having a detrimental effect on long term residents."* The applicant and design team have taken great care to ensure that the amenities currently enjoyed by the local residents are protected and where possible, enhanced. During the design stage and in consultation with Council engineers, the applicant explored all options for the proposed entrance and it was deemed that the current location is the optimum location for the proposed entrance from a traffic safety and traffic calming perspective and is the location which has the least negative impact on the neighbouring residents. As is evident from the submitted site layout plan the proposed entrance is directly opposite an existing laneway and not the appellants dwelling, which is situated to the west of the entrance.



Fig 6: Extract from site layout by Deady Gahan Architects



As can be seen from the streetview image below, the appellants property is also set back a considerable distance from the road edge and planting is in place within their front garden which will provide adequate screening and eradicate any issues of lights shining directly into the appellants dwelling. The Council assessed the proposed entrance and any potential impacts it may have on the appellants' property and deemed the proposed entrance location to be the optimum location.



Fig 7: Appellants property (LHS).

In relation to the appellants' claims in relation to fumes and noise pollution a comprehensive Construction Environmental Management Plan (CEMP) prepared by OSL Butler Consulting Engineers was submitted with the application. Air quality, dust and noise were comprehensively dealt with in sections 6.0 and 10.0 of this report and in chapters 12 (Noise and Vibration) and 13 (Air Quality and Climate) of the EIAR, which comprehensively considered the potential impacts and provided mitigation measures to alleviate any adverse impact on existing residents. The EIAR and CEMP was assessed by Cork County Council who raised no issues with the contents or proposals to deal with air quality, dust and noise.

The appellants also claim that *"the huge new hard surface areas will cause flooding."* We disagree with this statement. A comprehensive Drainage Impact Assessment (DIA – which includes SuDS) and a Site-Specific Flood Risk Assessment (SSFRA) by OSL Butler Consulting Engineers were submitted with the planning application. The site including all proposed residential dwellings is located in Flood Zone C as defined by the requirements of "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" and its Technical Appendices. Following the Flood Risk Assessment Stage 2 (Initial Flood Risk Assessment), it was determined that a Justification Test was not required.

In order to prevent any potential of pluvial flooding in the vicinity from the proposed developments hard surface areas, it is proposed to implement SuDS measures as outlined in the DIA and Infrastructure Report submitted by OSL Butler Consulting Engineers, to limit the discharge from the site to the current greenfield discharge rates. The implementation of these SuDS measures will not increase the risk of flooding elsewhere. It is considered that the proposed development will not have a negative impact on the surface water/flood regime of the area.

The SSFRA concluded that the proposed development is considered to have the required level of flood protection up to and including the 1% AEP storm event. The SSFRA and proposed SuDS measures were assessed by the area engineer who stated in his report dated March 25<sup>th</sup> that *"this is acceptable."*



**5. The planning application was accompanied by a very comprehensive list of supporting material which was prepared to a very high standard and contains all the information required by the planning authority**

The appeal by Simon Brewitt questions the validity of certain reports/information submitted with the planning application and pejoratively states that *"there are also errors and omissions in the information submitted."*

All documents submitted to the Council were prepared by competent professionals to a high standard and the fact that Cork County Council assessed the submitted documents and were satisfied to grant permission without a further information request, is testament to the quality of the material submitted at planning application stage.

The appellant claims that *"the Traffic and Transportation Assessment (TTA) is based on an erroneous analysis and therefore the conclusions of the TTA are invalid"* and that the impact of the volume of traffic passing through the junction with the R611 *"has not been correctly assessed by the applicant due to an error in the traffic modelling."* He goes on to state that the junction with the R611 *"appears to have been modelled incorrectly"* and *"the upper Kilmoney Road has been omitted entirely from the model."*

We entirely disagree with these statements. Please refer to Appendix 2 for a detailed response to the appellants concerns by MHL Consulting Engineers. A comprehensive Traffic and Transportation Assessment (TTA) by MHL Consulting Engineers was submitted with the application.

The design team also engaged in extensive consultations with relevant stakeholders to support a successful application prior to lodgement. In particular, Cork County Council and Transport Infrastructure Ireland (TII) were consulted regarding traffic and mobility considerations to ensure alignment with applicable guidelines and best practices. The seven analysed junctions were also discussed and agreed in advance with the relevant stakeholders.

The TTA assumed a robust development trip generation and concluded that the proposed development is appropriate and *"all modelled junctions are to operate within capacity up to and including the year 2041 for all design scenarios."* With the modal split targets proposed in the Cork County Council Development Plan 2022-2028 achieved, all junctions analysed would be within an acceptable design threshold in the design year 2041 with the proposed development and other large-scale developments in the area in operation.

The TTA was carefully assessed by the area engineer, Cork County Councils' Sustainable Travel Unit and the Senior planner none of these senior officials raised any issues with the modelled junctions and deemed the TTA and analysed junctions acceptable.

The appellant also claims that the Mountain Road Upgrade *"will result in a substandard road, not compliant with DMURS"* and *"the proposals set out in the application for the construction methodology are very superficial and lacking in detail."* As discussed in items 1 and 2 above, the proposed upgrade to Mountain Road fully complies with DMURS, as is detailed in the DMURS compliance statement by OSL Butler Consulting Engineers which was submitted as part of the planning application and the additional report by MHL included in Appendix 1.

As is standard practice for road upgrades, the proposed works will be carried out in agreement with the Local Authority. Prior to commencement of the works a detailed traffic and works management plan will be put in place to detail the phasing of the works and the measures being implemented to ensure the safety of all patrons using Mountain Road.



The phasing and the proposed delivery of the road upgrade which includes a 3m shared cycle/footpath which will greatly enhance the facilities available to the local residents will take place following detailed consultation with the local authority.

The appellants have also stated that *"the Outline Construction and Environmental Management Plan (OCEMP) which provides a basic strategy for construction, but which has largely omitted proposals for maintaining services and access."* We accept that there are existing services and accesses to be maintained along Mountain Road. The management of these existing services and accesses, including preventative measures with respect to minimizing/mitigating disruptions, will be incorporated into the final construction design detail and in compliance with the local authority requirements, as is standard practice.

In order to deliver the infrastructure as proposed, traffic management will be discussed and agreed with the local authority as is standard practice for this type of development. The preliminary proposals were assessed by the area engineer and the senior planner who stated in his report that *"the area engineers report does not raise any issues with proposals from the applicant to manage and mitigate against any such disruption."*

The appeal by Simon Brewitt has also raised concerns in relation to the landowner consents submitted with the application to facilitate the development and states that *"landowner consent is not provided for sufficient land to facilitate its construction."* He goes on to state that *"the landowners of the northern section of this proposed link, along part of the existing laneway where it adjoins Mountain Road (of which I am one) have not been consulted or given permission for either a planning application to be made or for the construction of the public walkway/cycle link. This can therefore not be delivered by the applicant and therefore should be omitted."*

As is evident from the consent map by Deady Gahan Architects and the letters of consent submitted with the application, full landowner consent has been provided for all aspects of the development including consent from Cork County Council for the improvement works to Mountain Road.

In relation to the existing lane where there is a CDP objective (CL-U-08) to provide a pedestrian/amenity walk, there are no physical works required to this lane and our client has the relevant consents to provide the tie-in works to the south (within the LRD scheme) and the north on to Mountain Road. This was accepted and reiterated in the Senior Planners report which acknowledged that the applicant has sufficient legal interest to deliver the proposed development, including the upgrade works to Mountain Road.

The appellant has questioned the space required to facilitate the Mountain Road upgrade and believes that additional space outside the red line boundary shown on the application drawings will be required to facilitate the Mountain Road upgrade and states that *"the developer has not provided any information to confirm that the landowners have consented to make more land available than is shown on the Consent Drawing"* - this is not the case.

The developer's proposal with respect to construction sequencing is to proceed with the land take along the northern boundary of Mountain Road first, in order to deliver the proposed shared pedestrian and cycle facility. During the construction of the shared pedestrian/cycle facility, the existing Mountain Road width plus the additional carriageway width (to 5.5m) is available and adequate to manage traffic and pedestrians during construction.

In response to Fig 3.6 of the Simon Brewitt appeal, we can confirm that the developer has the required consent from the owner of Folio CK12674 to facilitate the proposed works and that the works do not extend beyond the red line boundary at this location.



As mentioned above the applicant accepts that in order to deliver the infrastructure as proposed, traffic management will be required and agreed with the local authority prior to commencement. However, contrary to the appellants assertions, the proposed upgrade works will not require any additional land take, temporary or permanent.

The appellant has raised concerns in relation to the contents of the EIAR submitted with the application and claims that the EIAR *"makes little or no reference to the impact of the construction of the Mountain Road upgrade."* This shows the appellants complete disregard for the submitted EIAR and the Councils assessment of same. It is clear from the submitted EIAR material that every chapter references and considers the upgrades to Mountain Road both during construction and operational phase. The Council also concluded that *"these impacts have also been considered in the relevant chapters of the EIAR and will be minimised or mitigated where appropriate."*

The appellant goes on to state that *"the biodiversity assessment does not appear to have considered the Mountain Road at all. The proposed development results in the removal of every tree, shrub and other form of vegetation from the northern side of the Mountain Road, with resultant significant impact on visual amenity and biodiversity. No effort has been made to replace this loss by new planting of native tree species."*

We completely disagree with this statement. All material submitted to the Council, including the biodiversity chapter of the EIAR deals with the proposed upgrade works on Mountain Road in considerable detail, as is evident from figure 11.1 of the EIAR the biodiversity chapter.

The Boundary Treatment Plan by Simon Ronan Landscape Architects also clearly shows the replacement of the existing boundaries along Mountain Road with native hedging in a number of locations. The submitted drawings by Simon Ronan Landscape Architects also clearly show that overall there is a clear biodiversity net gain as a result of the proposed planting. This is reiterated by the Area Planner in his report which states *"I am satisfied that a significant portion of hedgerow is being retained."*

Section 11.10.2.5 of the EIAR also takes into account potential impact on removal of trees/hedgerows along Mountain Road and mitigation measures are outlined in section 11.11 to minimise this impact. Section 11.11.1 states that *"green infrastructure is incorporated into the design of the Proposed Development. The inclusion of native species **will enhance biodiversity overall** with provision of native shrubs, trees and sustainable surface water drainage methods including a rain garden as outlined in the landscape strategy prepared by SRLA (2025)".*

Section 11.13 states that *"using sustainable surface water management and planting of native hedgerow, trees and shrubs it is reasonable to state that the residual impacts arising following the implementation of mitigation will be **a net gain in biodiversity value** when compared to the baseline conditions of the Site. This is due to the relatively low ecological value of the main Site footprint in its current form and considering the landscape design plan and planting strategy (SRLA, 2025)."*

Section 11.10.2.1.5 of the EIAR states that *"The landscape plan and hedgerow management **will enhance the overall Site to a net gain** of breeding areas for common bird species. Impacts on breeding bird assemblages during the construction phase is assessed as negative, slight and long-term"*

Section 11.15 states that *"the assessment of potential adverse impacts resulting from the Proposed Development on biodiversity in this chapter has identified KERs including habitats and Fauna. It is reasonably considered that following all mitigation measures including design embedded and prescribed, adequate implementation of the CEMP, and adherence to construction best practice that **no significant effects to biodiversity** will arise from the Proposed Development during the construction or operational phases".*

It is submitted that the documents contained in the planning pack that were submitted to Cork County Council, including the EIAR, were prepared to a high standard by an experienced design team and contain all the relevant information required in relation to the proposed development.



Moreover, the planning application was developed in a collaborative approach with Cork County Council where discussions took place prior to the application being lodged to ensure a high standard of development for the area.

The appellants pejorative criticism of the material is in our view, unsubstantiated and does not reflect the quality of material submitted to the Council.

## Summary and Conclusion

To conclude, Cork County Councils' decision to grant permission for the proposed development was made on the basis that it was fully consistent with policy, suitable in terms design and layout, and consistent with the proper planning and sustainable development of the area. The fact that permission was granted for the proposed development by Cork County Council without the need for a further information request, is a testament to the quality of the proposal.

In relation to the grounds of the third party appeal against Cork County Councils decision to grant permission under Ref. 25/4551, our summary response to the issues raised is as follows:

- 1. The proposed development is fully in accordance with Government Policy and the Cork County Development Plan 2022 and does not materially contravene the plan.**
- 2. The proposed development has been designed in accordance with the Design Manual for Urban Roads and Streets and will greatly improve pedestrian/cycle safety and connectivity.**
- 3. The proposed development will not give rise to any adverse traffic impacts.**
- 4. The proposed development will not seriously injure the residential amenities of properties in the vicinity and will enhance Carrigaline as a whole by providing additional residential units in the town, where there is an acute need for housing.**
- 5. The planning application was accompanied by a very comprehensive list of supporting material which was prepared to a very high standard and contains all the information required by the planning authority.**

We would ask the Board to uphold Cork County Council's decision to grant permission as the proposed development will clearly not injure the residential amenities of properties in the vicinity and will enhance Carrigaline as a whole by providing additional amenities, infrastructure and residential units in a Metropolitan town where there is an acute need for housing.

We trust that this submission will be considered in the Boards assessment of the proposed development. Please contact the undersigned if you require any further information.

Yours sincerely,



Cora Savage

McCutcheon Halley



Appendices

- 1) DMURS Statement prepared by MHL consulting engineers.
- 2) Traffic Report prepared by MHL consulting engineers.





# ABP Appeal Response Engineering Report

MHL Project Number:	24051TT
Project Title:	Proposed Residential Development, Kilmoney, Carrigaline
Author:	DM
Planning Ref No.	Cork County Council Pl. Ref. 254551
Date:	10/07/2025
Subject:	Technical Note: Mountain Road Upgrade (DMURS)



## INTRODUCTION

MHL & Associates Ltd. Consulting Engineers have prepared this technical note in response to items raised by a third-party objector in an appeal to An Board Pleanála following a grant of planning permission by Cork County Council on the above planning application.

This technical note outlines the rationale and proposals for upgrading the existing local road to comply with the Design Manual for Urban Roads and Streets (DMURS) standards. The upgrade aims to enhance road safety, improve accessibility for all users, and promote sustainable transport options in line with current best practices in urban road design.

This note is supplementary to the OSL Ltd. responses to primary issues raised in the various third-party observations. This technical note outlines the design particulars related to engineering design and upgrading of the rural road to a DMURS compliant carriageway.

The design information, noted in the Appendix below was submitted pre planning to the Regional and Local Roads Design Office (RLRDO). The proposal included a 5.5m carriageway which has been designed to comply with DMURS alignment, compliant with vertical and horizontal geometries and that the pedestrian link has been upgraded to provide a 3m shared cycle/pedestrian connection on the north side of the Mountain Road again designed to link to the approved Part 8 at the junction with the R611.

## EXISTING LOCAL ROAD CONNECTION / EXISTING CONTEXT

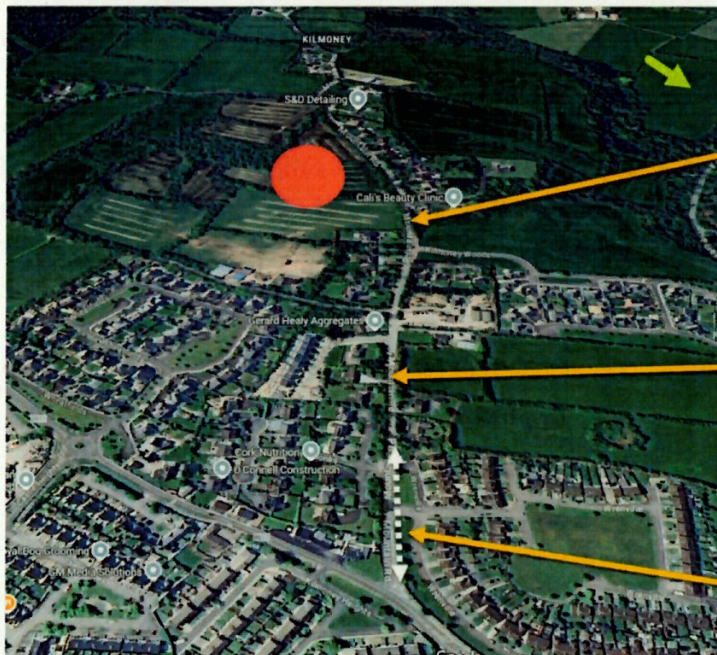
The existing Mountain Road joins the R611 at a Priority T junction. The Mountain Road runs southwest for circa 650m where it reaches the applicant's site.

Currently, the road exhibits several deficiencies, including inadequate width, poor surface quality, and insufficient pedestrian and cycling infrastructure. The existing carriageway width varies across the identified section, as noted in the figure below, and reflects the transition of the area on the urban fringe, changing from urban to semi-rural. As noted in the Appendix of this document, the existing carriageway is less than 4.4 meters wide for a significant portion of the local road's length, with no pedestrian or cycling facilities provided until the junction with Wrenville Estate, approximately 150 meters from the R611/Mountain Road junction. This equates to about 500 meters of existing roadway that is sub-standard for the connecting estates of The Monks, Abbey Lane, and Kilmoney Woods, as well as for individual property owners fronting onto this carriageway.



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◀ ◻ ◻ ◻ ▶ Extent of existing footpath

This lack of infrastructure is also clearly noted in the Quality Audit Report, "24051TT\_MHL-Doc01-QAR- Rev C\_Quality Audit", as previously submitted with this planning application.

## ROAD WORKS PROPOSALS

Road works proposals on Mountain road are to align with the following:

- Existing speed limit of 50kph.
- Existing junction access locations
- Horizontal and Vertical Design Parameters (To DMURS)
- Cross section widths (To DMURS)
- Align upgrade with Carrigaline area planning objectives for the road
- Account for setback and land consents of boundaries along the road edge



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- Introduction of traffic calming /junction tables
- Introduction of pedestrian crossing facilities
- Improved road markings and signage.

Existing services and access points along Mountain Road will be maintained, with measures to minimise disruptions included in the final design.

The upgrade will widen the road to 5.5 meters, aligning with DMURS recommendations for local roads.

## LAND CONSENT

The developer has obtained consent from the landowner for the proposed works, ensuring that the project remains within the designated area. Please refer to these details as submitted for this application.

## COMPLIANCE WITH DESIGN STANDARDS

The proposed road upgrade adheres to DMURS (Design Manual for Urban Roads and Streets) standards, with a compliance statement included in the planning application. As per 4.4 of DMURS: Carriageway Widths

*"When carrying out upgrades, or traffic calming works on existing streets, the first priority of authorities should be to narrow existing carriageways where they exceed those standards listed above. This will not only calm traffic, but will free up additional space within the street reserve to widen footpaths, insert cycle lane/tracks, provide bus lanes, street trees and on-street parking (all of which will further contribute to traffic calming)"*

### Summary of Lane Width Standards

**Arterial and Link Streets:** The standard lane width to be between 2.75m and 3.5m

**Local Streets:** The standard carriageway width should range from 5m to 5.5m, with lane widths between 2.5m and 2.75m.

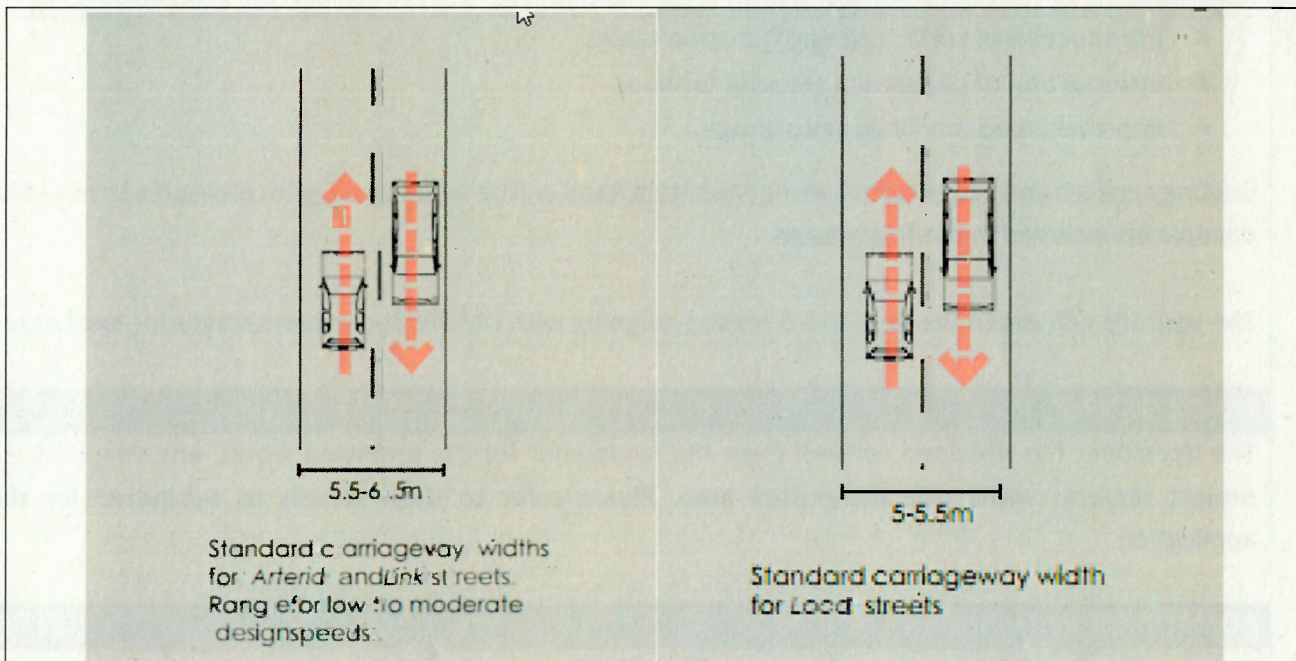
The upgrade includes a 3-metre shared cycle and footpath, enhancing local facilities, and will be phased in after discussions with all parties involved.

The road is not expected to be frequently used by heavy goods vehicles (HGVs), except for the occasional refuse collection and emergency service vehicle and farm machinery. This is indicative of its function as a local road link.



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DMURS P102, Figure 4.55: Carriageway Widths (note: Illustrations do not include cycle facilities)

Constraint	Description
<b>The local road/street Function and Context</b>	The existing local road ranges in road width; reflective of its semi urban / rural location. This upgrade will bring this facility in line with DMURS design guidance. It will regularise traffic and pedestrian flows along the route, providing traffic calming improvements reflective of the 50kph designated speed zone in the area.
<b>The Volume of Large Vehicles Using the Street</b>	Volume of HGV post construction is expected to be low, with the proposed DMURs local road providing sufficient capacity to cater for these flows.
<b>Access Requirements and Their Frequency</b>	Third party resident's access are to be maintained along the proposed upgraded Mountain Road alignment.
<b>The Total Number of Lanes</b>	A width of 5.5m allows for two way traffic, which improves traffic flow above the existing road facility. The provision of a 3m footpath will remove pedestrian/cycle movements away from the existing trafficked road way, providing a safer road environment for all road users in the area.
<b>The Necessity for Lane Width Reductions at Pinch Points</b>	The proposed road design accounts for pinch points and forms part of the land owners' consent obtained by the applicant.

The proposal includes a significant improvement in pedestrian and cycle safety by adding a 3-meter shared facility, which is currently lacking. The upgrade aligns with the Local Area Plan, emphasising



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improved connectivity, pedestrian-friendly infrastructure, and sustainable transport options in the village.

## Carriageway Width

The road carriageway width set at 5.5m complies with the existing and proposed traffic flows expected along this section of local road, accommodating two-way traffic while maintaining a compact footprint to discourage speeding.

## Vertical and Horizontal Design (DMURS compliance)

The Vertical and Horizontal design parameter adhere to DMURS as per Table 4.3,  
Design speed km/h 50kph/ minimum Horizontal Radius with adverse camber of 2.5% (curve 104>)  
Design speed km/h 50kph/ minimum Vertical Crest Curve K Value (4.7>), Sag Curve K Value (6.4>)

## Surface Improvement

The existing road surface will be upgraded to enhance durability and provide a smoother ride, reducing wear and tear on vehicles and improving safety.

## Traffic Calming Measures

Implementation of traffic calming measures, such as raised crossings, will be introduced to reduce vehicle speeds and enhance safety for pedestrians and cyclists.

Traffic Calming and Placemaking: Junction tables and raised crossings will create a sense of place, reduce vehicle dominance, and prioritize pedestrian movement, aligning with DMURS placemaking principles.

## Pedestrian /Cycle facility (3m)

Enhanced active travel link along the local road carriageway, providing improved connection for applicant's development and the neighbouring sites in the area.

## Signage and Markings

Appropriate signage will be installed, accompanied by road markings that adhere to DMURS standards.



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The proposed upgrade of this facility to DMURS standards will greatly enhance the existing local road, significantly improving safety, accessibility, and the overall quality of life for the community. This project is in line with best practice urban design principles and actively promotes sustainable transport options through the encouragement of active travel.

Furthermore, the proposed road width of 5.5 meters is designed to accommodate the anticipated traffic levels and speeds within the 50 kph zone, in accordance with Figure 4.55: Carriageway Widths referenced earlier. We believe that this upgrade will provide substantial benefits to the local area and respectfully request the planning authority's support for this application.



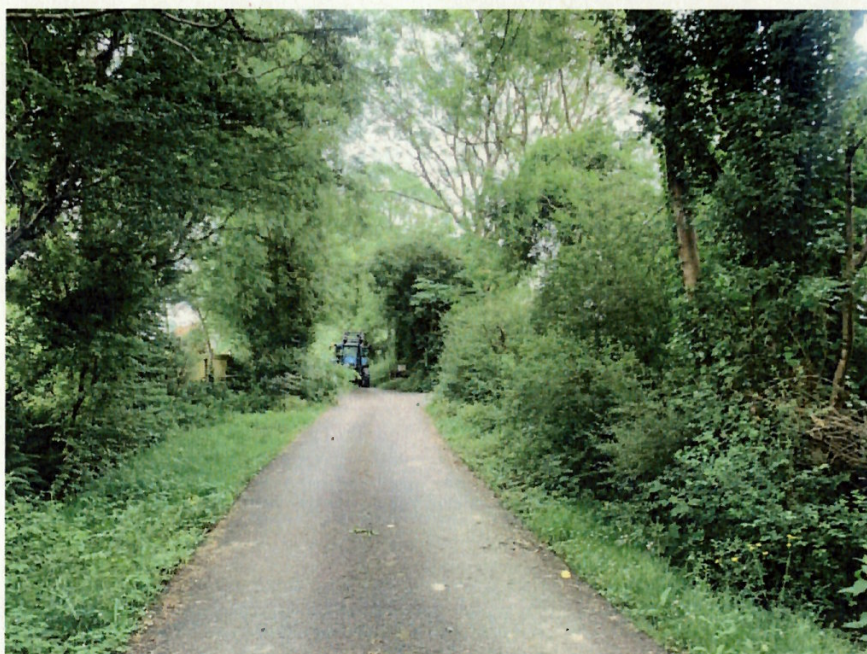
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## Appendix

### Existing Road Carriageway





# ABP Appeal Response Engineering Report

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**ACEI**



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### Proposed Development layout





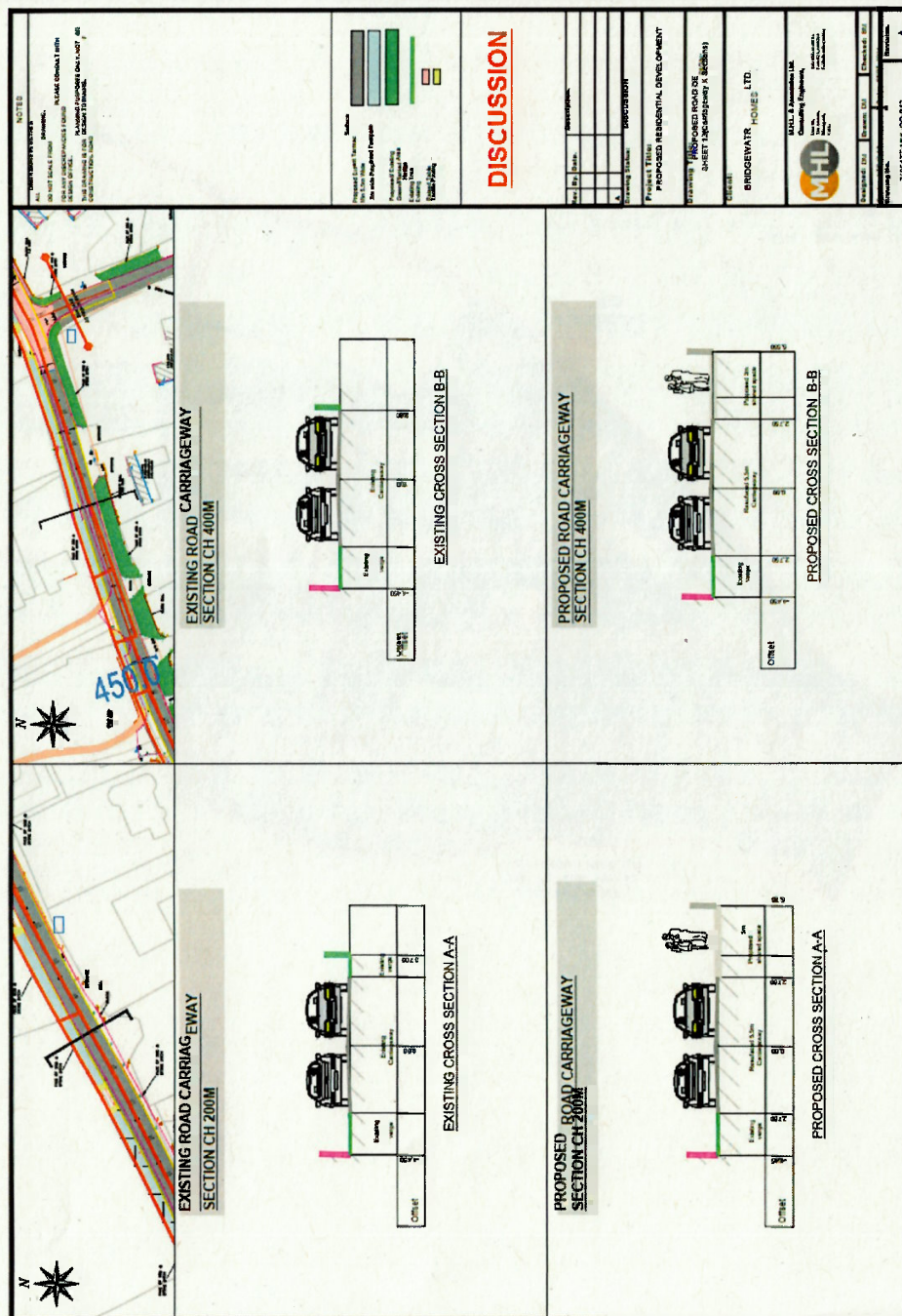
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## DMURS Discussion Road Layouts for Mountain Road

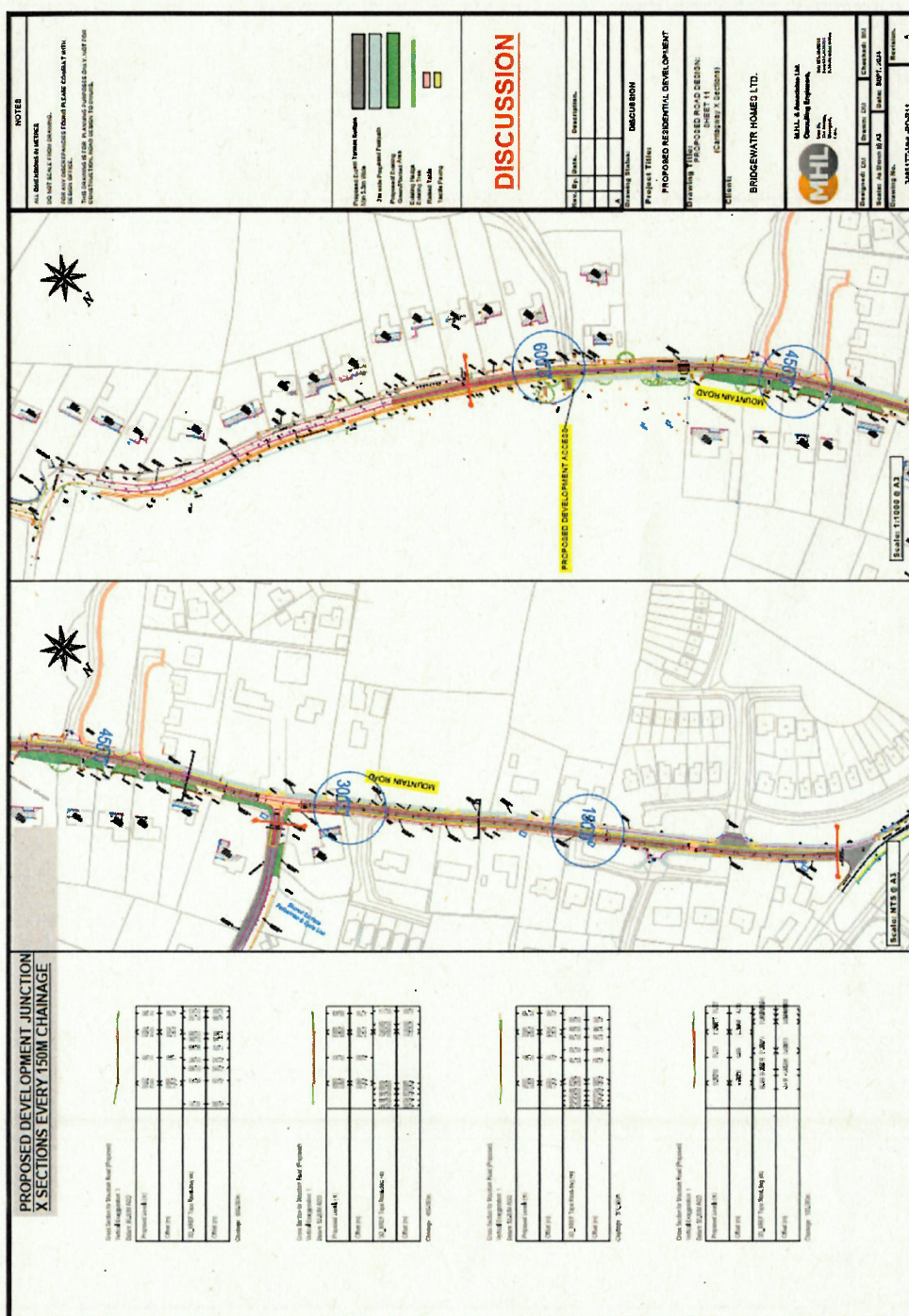
## X sections





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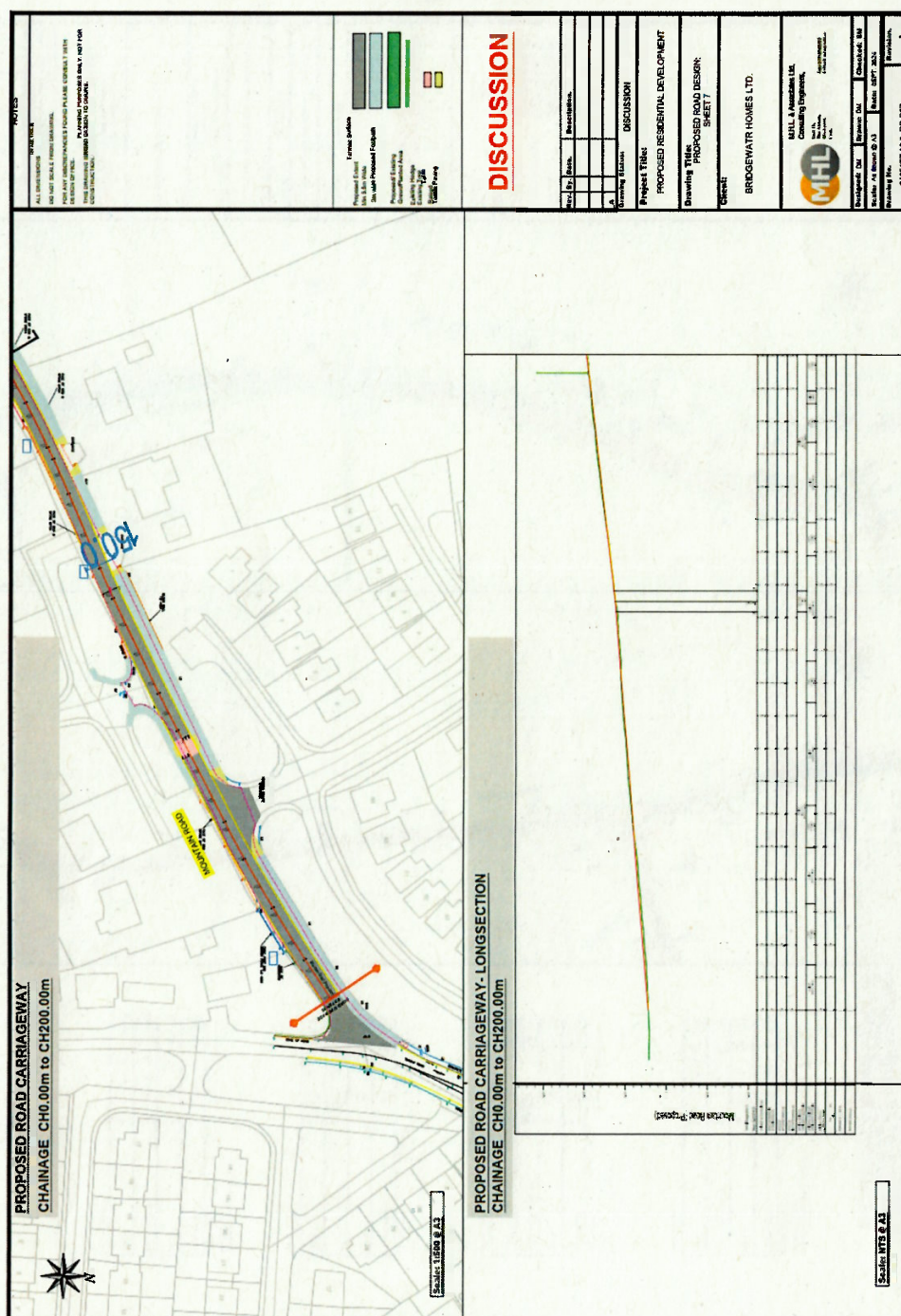
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## Vertical Design

### Long sections



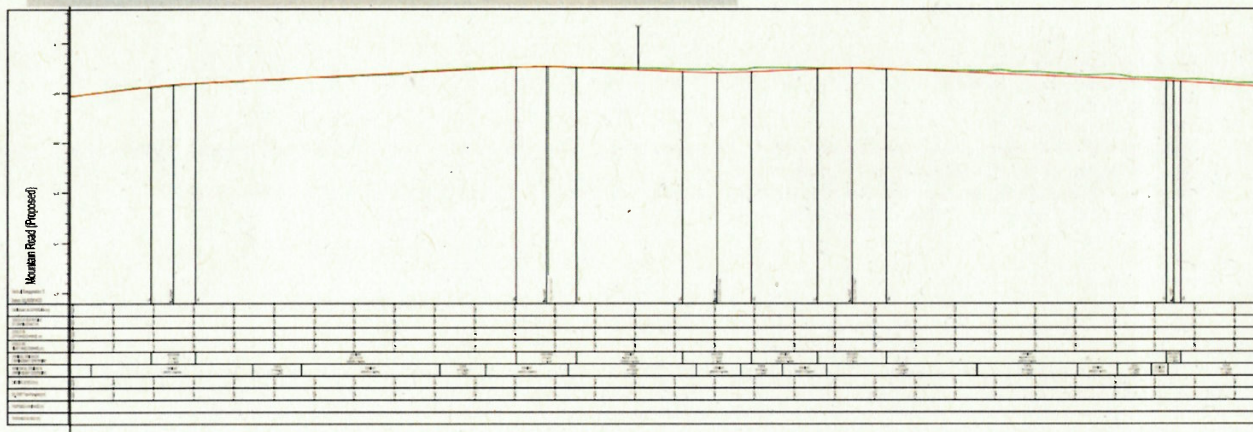


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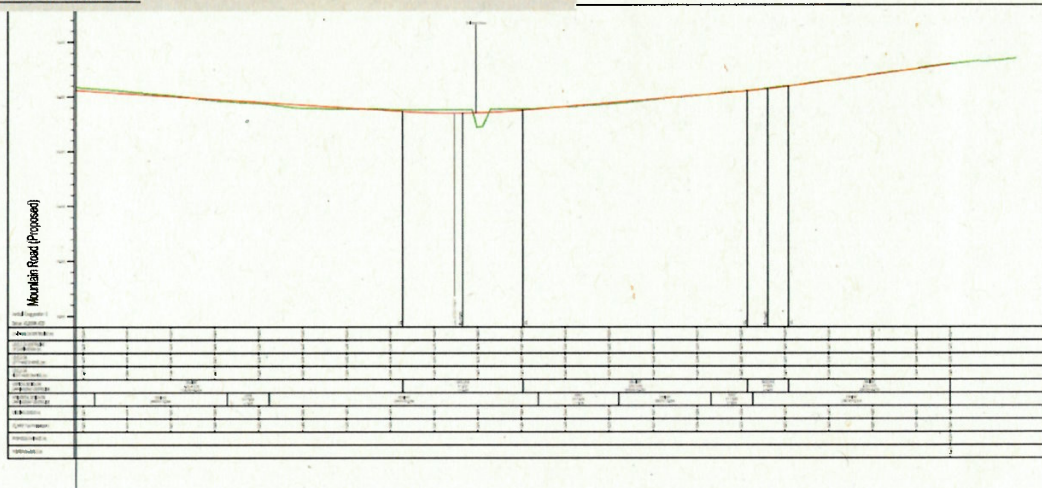
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## PROPOSED ROAD CARRIAGEWAY- LONGSECTION CHAINAGE CH200.00m to CH500.00m



## PROPOSED ROAD CARRIAGEWAY- LONGSECTION CHAINAGE CH500.00m to CH700.00m



Scale: NTS @ A3



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## Correspondence

### Communications with Cork County Council

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

From: **Liam Ahearn** <[Liam.Ahearn@corkcoco.ie](mailto:Liam.Ahearn@corkcoco.ie)>

Date: Tue, 15 Oct 2024 at 09:42

Subject: RE: Letter of Consent

To: David Butler (OSLButler) <[dbutler@oslbutler.ie](mailto:dbutler@oslbutler.ie)>, Tom Halley <[T.Halley@mhplanning.ie](mailto:T.Halley@mhplanning.ie)>, Cora Savage <[csavage@mhplanning.ie](mailto:csavage@mhplanning.ie)>, Richard Keating <[Richard.Keating@corkcoco.ie](mailto:Richard.Keating@corkcoco.ie)>, Pam Galvin <[Pam.Galvin@corkcoco.ie](mailto:Pam.Galvin@corkcoco.ie)>, Brian Murphy <[bmurphy@mhpl.ie](mailto:bmurphy@mhpl.ie)>

Cc: Bryan Riney <[Bryan.Riney@corkcoco.ie](mailto:Bryan.Riney@corkcoco.ie)>, Ciaran Dineen <[cdineen@mhplanning.ie](mailto:cdineen@mhplanning.ie)>, Charlie McCarthy <[Charlie.McCarthy@corkcoco.ie](mailto:Charlie.McCarthy@corkcoco.ie)>, Madeleine Healy <[Madeleine.Healy@corkcoco.ie](mailto:Madeleine.Healy@corkcoco.ie)>, Flor O'Sullivan <[Flor.O'Sullivan@corkcoco.ie](mailto:Flor.O'Sullivan@corkcoco.ie)>

Dear Tom & David,



Thank you for the clarification s below and the drawing provided for our Regional and Local Roads Design Office (RLRDO) awareness.

It is noted that the proposal includes a 5.5m carriageway which has been designed to comply with DMURs alignment, compliant with vertical and horizontal geometrics and that the pedestrian link has been upgraded to provide a 3m shared cycle/pedestrian connection on the north side of the Mountain Road again designed to link to the approved Part 8 at the junction with the R611.

Our RLRDO technical team will review and assess the proposal submitted through the application process.

@Richard Keating - the red line boundary maps submitted appears to be satisfactory from RLRDO perspective. Please continue with your property teams review and assessment.

Kind regards,  
Liam

**Liam Ahearn**   MEng, MSc, MA, | Senior Engineer | Regional & Local Roads Design Office

| Cork County Council, Roads Directorate, Floor 10, County Hall, Carrigrohane Road, Cork, T12 R2NC |

| T: 00353 (0)21 4285593 | E: [Liam.ahearn@corkcoco.ie](mailto:Liam.ahearn@corkcoco.ie) | W: [www.corkcoco.ie](http://www.corkcoco.ie) |



# ABP Appeal Response

## First Party Response to Third Party ABP Appeal

MHL Project Number:	24051TT
Project Title:	Proposed Residential Development, Kilmoney, Carrigaline
Author:	CDReviewed: DM
Planning Ref No.	Cork County Council Pl. Ref. 254551
Date:	07/07/2025
Subject:	First Party Response to Third Party ABP Appeal



### INTRODUCTION

MHL & Associates Limited Consulting Engineers, acting on behalf of Bridgewater Homes Limited, have prepared this technical note in response to items raised by a Third-Party Objector appeal to An Bord Pleanála (ABP-322734-25), following a grant of planning permission (Planning Reference Number 254551) by Cork County Council for the above planning application. This report outlines our response in relation items related to Traffic and Transportation Reporting. A summary of the primary issues raised in the various third-party observations is presented below, followed by the submitted response for the respective items.

### APPEAL RESPONSE

**Item: Mountain Road and R611 Junction – Junction model does not include the Upper Kilmoney Road.**

#### MHL Response:

The extent of the TTA was scoped with the roads authority prior to the preparation of the report and associated modelling. The junctions to be included in the TTA were agreed upon at planning stage with the local authority and deemed appropriate for the assessment of the proposed development junction. We reassert that the TTA junction assessment/modelling, as submitted, incorporated nine junction as part of the broader network analysis of the town. This provided a robust basis of assessing the impact of the development on the wider area in terms of near term, medium term and long-term traffic design scenarios (2026, 2031, and 2041). The junction layouts, as assessed, were modelled using industry-standard software (e.g., TRL Junction 9) and Linsig signalised junction software, with data inputs derived from comprehensive traffic surveys conducted during peak hours in May 2024 by third party traffic enumerators. Design capacity (RFC), Max Queue (PCU) and Delay results demonstrate that the overall capacity of J2 is such as to not be impacted by the nearby Upper Kilmoney Road Priority "T" junction. The model accounts for vehicular movements coming from Upper Kilmoney Road, with these flows represented as mainline traffic at Junctions 2, 3, and 4.

- Junction 1 – Development Access
- Junction 2 – R611/Mountain Road Priority T-Junction
- Junction 3 – R611/Castle Heights/Wheatfields Priority Roundabout
- Junction 4 – R611/Forest Rd Priority T-Junction
- Junction 5 – R611/Pottery Rd Signalised T-Junction
- Junction 6 – R611/Church Hill Priority T-Junction
- Junction 7 – Pottery Rd/Mill Rd/Aldi Access Signalised T-Junction

The submitted modelling confirms that junction 2, R611/Mountain Road Priority T-Junction, is operating within junction capacity thresholds, as referenced in the findings in the TTA report: 24051TT-MHL-Doc02-TTA-Rev D \_ Traffic and Transportation.



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# ABP Appeal Response

## First Party Response to Third Party ABP Appeal

MHL Project Number:	24051TT
Project Title:	Proposed Residential Development, Kilmoney, Carrigaline
Author:	CDReviewed: DM
Planning Ref No.	Cork County Council Pl. Ref. 254551
Date:	07/07/2025
Subject:	First Party Response to Third Party ABP Appeal



**Item: Mountain Road and R611 Junction – Junction model includes a non-existent right turn lane for southbound traffic to turn right from the R611 onto Mountain Road.**

### MHL Response:

The appeal suggests that the model includes a non-existent right-turn lane for southbound traffic from the R611 onto Mountain Road. We acknowledge the objector's confusion regarding the labelling in the diagram; however, we believe this misunderstanding arises from not interpreting the diagram correctly. The underlying traffic model does not assume the presence of a dedicated right-turn lane for this movement. Instead, it accurately reflects the lane configuration for southbound traffic on the R611, with right-turning vehicles yielding within the main carriageway, the diagram is a representation of the traffic movements at the junction and not the lanes. The established modelling includes for C-B traffic to block B-A traffic, to ensure that the junction's functioning is represented in the modelling. The model uses conservative assumptions for right-turn delays, which aligns with observed conditions and ensures that the analysis accounts for potential queuing. Arm A also has two 'lanes' in Figure 2.2 as shown, this is again however just a re presentation of the traffic movements from that Arm.

**Item: Mountain Road and R611 Junction – More cars arriving at the junction (one every six seconds) than are able to leave it (one every ten seconds)**

### MHL Response:

The appeal argues that the TTA's prediction of a 10-second delay for southbound right-turning vehicles onto Mountain Road, combined with a southbound traffic arrival rate of one car every six seconds, would lead to an ever-expanding queue and potential gridlock, blocking the pedestrian crossing and Upper Kilmoney Road. This conclusion misrepresents the TTA's findings. The TTA's traffic flow analysis is based on a calibrated model that accounts for the dynamic interaction of all vehicle movements at the junction, including through-traffic, turning movements, and pedestrian crossing activity.

The model predicts that the junction will operate at a Level of Service (LoS) C during the evening peak, with a maximum Degree of Saturation of 85% for the critical southbound right-turn movement. This is well within the threshold for acceptable junction performance (typically 90% DoS). The appeal's assertion of gridlock assumes a static queue without considering the clearance of vehicles during gaps in opposing traffic. The delay shown in the results for the traffic modelling is the maximum delay experienced over a time period. The hour modelled for the PM Peak is broken up into 15-minute segments with the delay fluctuating from segment to segment. Therefore, not every vehicle that arrives at the junction is delayed by 10 seconds

Additionally in response to this concern, it is emphasised that the Traffic and Transport Assessment (TTA), as submitted, complies with the relevant guidelines, specifically the TII Traffic and Transport Assessment Guidelines. The Planning Authority's decision not to request further information suggests a level of confidence in the TTA's thoroughness, as indicated by the absence of specific concerns in the Area Engineer's report. Additionally, the report's comments regarding



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# ABP Appeal Response

## First Party Response to Third Party ABP Appeal

MHL Project Number:	24051TT		
Project Title:	Proposed Residential Development, Kilmoney, Carrigaline		
Author:	CD	Reviewed:	DM
Planning Ref No.	Cork County Council Pl. Ref. 254551		
Date:	07/07/2025		
Subject:	First Party Response to Third Party ABP Appeal		



modal shift are consistent with the TTA's sustainable transport measures, which include promoting walking, cycling, and public transport use to decrease reliance on cars.

### Item: Impact on Public Transport and Pedestrian Safety

#### MHL Response:

The appeal suggests that the TTA fails to adequately consider the impact of additional traffic on public transport and pedestrian safety. On the contrary, the TTA explicitly evaluates these factors. Section 5.4 of the TTA addresses public transport, including the existing and planned bus routes through the junction. The analysis accounts for the increased bus frequency proposed in the regional transport plan and confirms that the junction can accommodate these movements without significant disruption.

Regarding pedestrian safety, the TTA and MMP references connectivity to with projected traffic volumes not modelled to exceed the capacity thresholds that would compromise safety. The applicant's planning submission design layouts and reports proposes additional pedestrian-friendly measures, such as improved signage and tactile paving, to enhance accessibility and safety. The applicant has proposed extensive measures to enhance the Mountain Road's carriageway to meet DMURs standards. These improvements aim to enhance pedestrian connectivity and incorporate suitable carriageway design and traffic calming measures along the local road, benefiting both the development and neighbouring homeowners in vicinity of these improvements.

### CONCLUSION

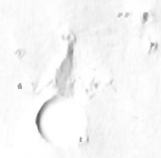
The TTA submitted with the planning application is comprehensive and based on rigorous data collection and modelling. The concerns raised in the appeal regarding the junction between the Mountain Road and the R611, including the Upper Kilmoney Road and pedestrian crossing, are either based on misinterpretations of the TTA or have been adequately addressed within the assessment. The model correctly represents the junction's geometry and traffic flows as describe and matches site visit observations and collated traffic counts for peak hour periods during morning and evening traffic periods. The predicted impact of the development traffic on the nearby transport network is deemed appropriate as per relevant guidelines, in terms of capacity, and pedestrian safety. We respectfully request that the Board consider this technical note response, and the robust evidence provided in the TTA when evaluating the planning application. The proposed development will deliver much-needed housing while maintaining the functionality and safety of the local transport infrastructure. We are confident that the TTA, coupled with the submitted Quality Audit Report, MMP, Outline Construction Traffic Management Plan and Road Safety Audit Stage 1&2 provides sufficient information for the Board to grant permission for the development.



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