

Barry Molloy & David Gee

The Cottage
Brennanstown Road
Dublin 18
D18 E9R5

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

13th May 2022

Ref: Observation to Barrington Tower Strategic Housing Development (SHD) at Brennanstown Road, Dublin 18 (An Bord Pleanála [ABP] Ref. TA06D.313281).

Dear Sir/Madam,

As private residents with property which directly abuts the Barrington Tower development, it is our strong view that the proposed plans will result in an overdeveloped site which will not only have significant overbearing impact on our property but will also have a detrimental impact on the safety of the Brennanstown Road with regards to traffic management and pedestrian use. We request that the board refuse permission to the applicant for the reasons outlined below.

1. Privacy, Overlooking and Density
2. Road Safety and absence of Traffic Management Plan for the entirety of the road

Privacy, Overlooking and Density

DLRCC Policy Objective PHP20: states "Protection of Existing Residential Amenity. It is a Policy Objective to ensure the residential amenity of existing homes in the Built-Up Area is protected where they are adjacent to proposed higher density and greater height infill developments."

We submit that the proposed development would materially contravene Objective PHP20 and accordingly would, due to their height, overlooking, loss of privacy, scale, visual obtrusion, failure to respect the existing patterns of and scale of local development, loss of sunlight to mature gardens and hedgerows, seriously injure the residential amenity of our property leading to a loss in house price.

The height and physical encroachment in direct proximity to our home is of significant concern. A five story block within approx. 20 meters of our boundary, to the north east of the site will have severe privacy implications. We will be overlooked to the North, West and South. The eastern elevation of Block CD within the plans will cause direct overlooking by 16 balconies and over 30 windows. We don't believe that the buffer zones are sensitively considered with respect to overlooking our residential amenity.

Block CD and Block E will have direct line of sight into our living space and first floor master bedroom/bathroom. This bathroom window is a large window with transparent glass (permission granted with consideration of the proposed Barrington Tower development plans - Ref: D13B/0210) which is approximately 4 meters from our rear boundary facing the development.

Based on our understanding of the applicant's submitted drawings and photomontages the below figure represents a fair estimation of the impact the development will have on our property.



Fig 1. Edited montage facing North East in the direction of the cottage (South elevation)

We also challenge the applicant's representation on page 20 of the submitted photomontage document (fig.2) with artistic impression of block CD relative to our property, and request an independent assessment of the true potential overbearing impact considering the increasing elevation and altitude travelling west along the road. Based on our examination of the Architectural and Engineering drawings submitted we feel this misrepresents the true scales involved, and provide an alternative representation in fig. 3.



Fig 2. Applicant's submitted montage of Brennanstown Road with the cottage gate in foreground



Fig 3. Alternative photomontage of Brennanstown Road with the cottage dwarfed in foreground.



Fig 4. Site section from Brennanstown Road showing rising elevation on the road from the cottage on the east, to the development on the west (**adding** to overlooking/shadowing aspect).

Privacy, overlooking and shadowing is of great concern to us and the idea of facing five and ten storey buildings with a multiplicity of glass balconies addressing what we currently regarded as our private living spaces is extremely worrying. The applicant proposed to address this with their boundary treatment plan, which would require enough trees to have the same effect of placing our home within a cave. The proposed development will devalue properties like ours in the immediate vicinity. Far from preserving the amenity of existing residences, this proposed vista destroys any peace of mind relating to potential future development. It's not about objecting to other families living opposite us, as an appropriately scaled proposal would enhance the area, but is about being overlooked from a height of eight storeys mere metres away, and having hundreds

of cars moving around to the back of our property removing any of the current seclusion enjoyed by this unique location.

We ask that it be made incumbent on the applicant to provide accurate visuals (photomontages) for the proposed development with a perspective of the view from the rear of our property. There is minimal perspective in the application looking towards the blocks from adjoining houses to give an idea of what to realistically expect. Furthermore most of the site sections (drawings) provided are so obscured with trees that you cannot form an idea of relative scale.

As it is the Applicant's obligation to protect and/or improve residential amenity, and enhance cultural heritage, we request a site visit by planning officials from An Bord Pleanála to fully understand the negative impact a development of this height and density will have on our home and wider community.

It is our view that given the Material Contraventions above, any future proposed development should be significantly reduced.

The topography of the northern boundary does not allow for taller buildings without damaging the appearance or character of the area by the impact of significantly overbearing existing adjoining residential properties east and west of the northern boundary. Blocks AB and CD, at a minimum, should be removed from any new proposal. This land should be laid out as public open space as a community gain for the Brennanstown Road Area to improve local amenity.

Road Safety and absence of Traffic Management Plan for the entirety of the road

SLO 73 states: *"It is an Objective of the Council: To limit development along the Brennanstown Road to minor domestic infills and extensions until a Traffic Management Scheme for the area has been completed and its recommendations implemented."*

We submit that the proposed development would materially contravene Objective SLO 73 and that if An Bord Pleanála disregards Objective SLO 73 it would fail to discharge its duty of care to existing and future residents and all the foreseeable users of Brennanstown Road.

We implore An Bord Pleanála to consider the health & safety implications and consequences of additional vehicular traffic on this road. There is a long history of planning implications that have resulted in the substandard current status of the Brennanstown Road. It is also our understanding that road analysis used by the applicant is outdated and doesn't reflect true traffic models. It is our view that independent traffic modelling should be commissioned by responsible agencies.

There is no public transport on Brennanstown Road as passenger buses cannot safely negotiate it. Along with a three tonne vehicle weight restriction in place, this should raise a red flag when high density developments are being considered.

There are no cycle lanes on the road, and the applicant puts significant focus on the 1,266 bicycle parking in the plans, without addressing the fact that cyclists are reasonably more dependent on such segregation and protection from vehicle traffic, upon leaving the development itself.

The applicant references recent planning decisions (ABP-301614-18 & APB-305859-19) along the same section of road as justification to their high density development without acknowledging that these new developments have not been properly supported by necessary overall improvements to the entirety of the Brennanstown Road. The board will be fully aware that the Part 8 strategy proposed to improve the road was rejected in 2017 by the local councillors, and no other overall measures to mitigate risk and promote the

safety of road users have been put in place since. This presents an ever-increasing risk to our safety that can no longer be ignored in the context of planning decision-making.

The proposed application does not account for safe pedestrian use of the road in its entirety. The Brennanstown Road does not have continuous use of a footpath with specific areas of the existing footpath being less than two ft. in width. To the eastern section of the road in the direction of Cabinteely, along one of the most treacherous sections including a severe dogleg turn, no footpath exists at all.

We also have concerns with regards to the additional traffic generation from outside the development caused by opening the new Luas stop (when opened), and retail elements (Shops/Creche).

Brennanstown Road is in essence a rural road, described in the County Plan as a “country lane”, and would be considered substandard, and unsuitable to SHD for the following reasons:

- Limited forward visibility in certain sections
- Horizontal alignment not suitable for 3 tonne vehicles
- Vertical alignment not suitable for persons with mobility and visual impairment
- Geometric layout not suitable for two-way traffic at parts
- Limited public lighting
- Limited footpaths
- No cycle facilities

Simply put, the site with particular focus on road safety does not have capacity to absorb the scale & density of the development proposed.

For example, HGVs and emergency vehicles cannot traverse the new roundabout at Brennanstown Wood without mounting the kerbs on the footpath and roundabout itself. Several instances of such kerbing have been witnessed causing damage to signage and planting as referenced in Fig 5 and Fig 6.



Fig. 5 Road signage damage at Brennanstown Wood Roundabout.



Fig. 6 Kerbing and overrunning on footpath at Brennanstown Wood (regular occurrence).

Summary

We believe our home is the most impacted property on the site boundary map, and we ask that you simply ensure that we are fairly and respectfully considered as significantly impacted stakeholders. It is our belief that the applicant has not adequately considered the impact with regards to our privacy and road safety.

The stated step-back on the units bordering the Brennanstown road doesn't go far enough to address the expected alignment to rural aesthetics. Plans are not in character with the surrounding area, and not in accordance with the Urban Design Manual for this road.

The planning processes ask of developers "How does the development respond to its surroundings?", and it is our strong belief that this application falls very short of the expected standard. The proposal fails to pay attention to the sylvian character and biodiversity of the area with the removal of existing mature tree coverage, hedgerows and stone walls.

A basic internet search will return results where ABP have upheld refusal decisions for smaller developments in the area based on traffic movement and turning implications at the respective junctions on Brennanstown Road, further sighting impacts on public safety and traffic hazards.

The power held by this board regarding these types of planning decisions will be considered and studied long into the future, and can have huge irreversible impacts on the communities and living spaces we create for generations to come.

The word "Strategic" is key to this type of application and to the unique responsibility it places on the board, therefore we ask the question of you; what is strategic about disregarding the years of failed traffic management planning on the Brennanstown Road, only to add to traffic related risks of serious injury or fatality and the general degradation of the quality of life in the area?

We ask that you withhold approval of the proposed development and protect & uphold the standards of proper urban planning.

We request an oral hearing with An Bord Pleanála to discuss our specific concerns.

Payment of fee included with submission.

Regards,
Barry Molloy & David Gee.