



# **Glendruid Dolmen Public Group**

**Submission regarding Barrington Tower SHD**

**Application by Cairn Homes PLC**

**16<sup>th</sup> May 2022**

Submitted on behalf of Group (GDPG)

by : Rachel MacGowan

Postal Address:

The Grange Apt 41 Sapphire , Brewery Road, Stillorgan, Dublin18 , A94 NF40

## Introduction

This submission is from the *Glendruid Dolmen Public Group*. We are seeking to improve access to the Glendruid Dolmen and to protect its special setting, and the parkland character of the Glendruid valley for current and future generations. This includes protection of the views in the valley and protection of the natural woodland character.

## Focus of Submission

The Group has focussed in particular on the Heritage aspects of the Barrington Tower SHD and its impact on the heritage and amenity value of heritage sites in close proximity.

It will also consider the impact on biodiversity, trees, road infrastructure and over bearing and over densification.



*Aerial view showing close proximity of Glendruid Valley and heritage sites in relation to applicant development.*



### **The Glendruid Dolmen Public Group, GDPG**

The Glendruid Dolmen Public Group was established in October 2021 by concerned members of the public to raise awareness and get greater transparency on access and other issues relating to Glendruid Dolmen and Valley area.

The About section from October 2021 gives the group's objective:

*"This Group has objective of giving a forum for anyone interested in this amazing Dolmen that sits in a beautiful valley in South County Dublin. For almost 5,500 years it has enjoyed a natural setting and this may change with the encroachment of large residential developments. It is important that the public know what is planned and how this is sensitively handled."*

The interest of the Group has extended to the wider Glendruid valley area, and issues of heritage, biodiversity, spiritual aspects of the ancient tomb area, and greater access.

The Group currently has **1,300 members**. It has a four person organising committee, and three administrators to moderate online content. This submission is the approved submission on behalf of the Group and was prepared by the GDPG committee.

## Part 1

### HERITAGE & ARCHAEOLOGICAL ISSUES

## Protection of Monument Setting's – County Development Plan Policy

Chapter 11 of the DLR County Development Plan makes it clear that the DLR Council will strictly control development proposals that could have a **negative impact** on the significance of monument sites and their interpretation. Land use shall not give rise to significant losses of integrity or context.

GDPG would urge An Bord Pleanála to follow this policy of the DLR Council and take the importance of the setting of the Glendruid Dolmen into account when assessing the appropriateness of building high rise apartment blocks on a site that is 200 meters from the National Monument, the Glendruid portal tomb.

Such a large scale development would negatively affect the context and significance of this ancient site forever. It would be the equivalent of **urban planning vandalism**. Members have likened it to building 10 storey blocks beside Bru na Boinne / Newgrange. It would be completely inappropriate and a stain on urban planning in Ireland.

### 11.3.1.2 Policy Objective HER2: Protection of Archaeological Material in Situ

It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG).

The Council will strictly control development proposals that could have a negative impact on the significance of archaeological sites and monuments, their settings and/or interpretation. Land uses shall not give rise to significant losses of the integrity, quality or context of archaeological material – except as may be conditioned or directed by the appropriate heritage agencies. This shall be achieved by the application of appropriate design standards and criteria.



***Extract from Chapter 11- Heritage and Conservation, DLR CoCo County Development Plan.***

## Recommendations of Office of Planning Regulator and Dept of Housing and Heritage

The construction heights as proposed under this Barrington Tower SHD are unsuitable on the grounds of visual amenity impact in relation to a very significant national monument, the Gledruid portal tomb.

The ancient tomb, built by the first neolithic settlers in Ireland was located in a carefully chosen location in the landscape: at the base of cascading waterfalls, on valley floor, and with an orientation to the west, and the peak at Two Rock mountain. A Cairn passage tomb is located at this peak. Interfering negatively with this alignment by placing high structures in relatively close proximity would be most unsuitable and should be refused from a far sighted Bord Pleanála.

These are the recommendations and guidelines of the Office of the Planning Regulator and the Department of Housing and Heritage (see below).

Archaeology in the Planning Process · 10

### 16. Is there a standard buffer zone around archaeological sites and monuments within which development should not occur or which determines conclusively whether or not a proposed development would have implications for the site or monument?

No. There are many factors which can affect the extent of the archaeological potential in the area around a monument, and which may be relevant as to whether a proposed development will be unsuitable on grounds of archaeological impact (including visual amenity impact in relation to a monument). These factors include the type and condition of the monument, the landscape, the previous land use and the nature and scale

of the proposed development. The “zones of notification” which can be viewed on the Historic Environment Viewer (and the circles etc. drawn on RMP maps), are not definitive one way or the other as to whether development will be permitted, without the factors noted above also being taken into account. They do, however, give an indication that archaeological considerations may be an important aspect in consideration of any development proposed with the “zone of notification” or RMP area.

***Extract from the Recommendations of Office of Planning Regulator and Dept of Housing and Heritage***

## Inadequate EIAR

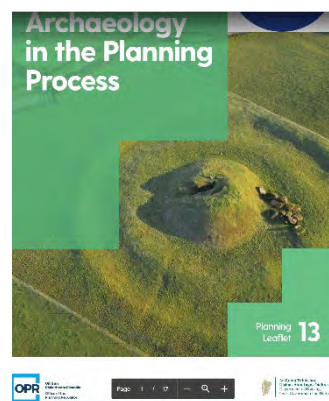
The EIAR must address all aspects of the impact in relation to sites and monuments protected under National Monuments Act

The EIAR does not adequately address the context of the development with respect to the important portal tomb and its setting which is 200 m from the development site. It does not address the issue of the importance of the setting to the National Monument and importance visual connection with the other monuments. The Office of the Planning Regulator and the Dept of Housing state that an EIAR must address “impacts and effects on all aspects of archaeological heritage”.

### 17. Do particular issues arise in relation to major developments?

Major development projects are generally subject to a requirement for the carrying out of environmental impact assessment. This arises under the European Union (EU) Directive on Environmental Impact Assessment (EIA), as implemented in Irish law. As part of the process, the developer must prepare an Environmental Impact Assessment Report (EIAR) which sets out details of the project and the likely significant effects of the development on the environment, including archaeological heritage, and the measures proposed to mitigate adverse effects.

The EIA process (and any EIAR) must address impacts and effects on all aspects of archaeological heritage (including historic wrecks), not just impacts and effects in relation to sites and monuments protected under the National Monuments Acts or those identified in the Historic Environment Viewer (HEV). Preparation of an EIAR must



therefore involve an appropriate level of archaeological assessment directed at the identification of previously unidentified archaeological heritage and appropriate mitigation measures in relation to such heritage, including features which might come to light in the course of development.

Even in the absence of a requirement for EIA, large scale development will likely be subject to requirements for archaeological assessment in advance of a grant of permission, by way of requirements for submission of further information. Engaging appropriate professional archaeological expertise at an early stage will assist in dealing with this.



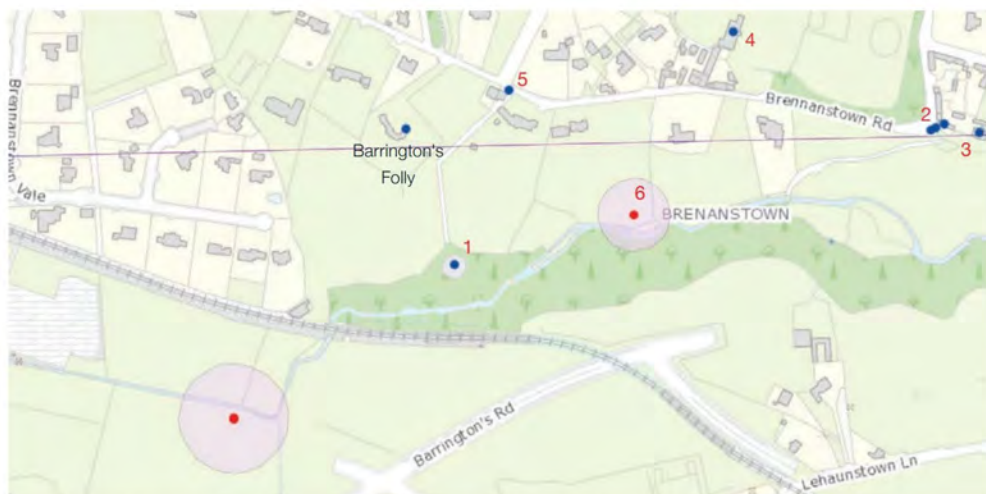
### ***Incorrect and misleading Application for SHD Development***

Cairn Homes Plc or their consultants tick the box to say “NO”: Their development they claim does NOT affect and is NOT close to a National Monument. This is not the case. It is very close to a very significant National Monument, a 5,700 year neolithic tomb. This tomb has an alignment across the development site to the Cairn on distant Fairy Castle, Two Rock. As stated previously, the Heritage report does not address sufficiently in importance of Glendruid Dolmen and its setting.

Two hundred meters distance is close. The correct answer is Yes, the proposed application development does affect the national monument and its setting.

(j) Does the proposed application development affect, or is close to, a national monument or place in the ownership or guardianship of the Minister for Culture, Heritage and the Gaeltacht or a local authority, or is it the subject of a preservation order or temporary preservation order under the National Monuments Acts 1930 to 2014?		X
--	--	---

***Extract from Barrington Tower SHD- Applicant ticks box to answered the question negatively.***



Extract from Historic Environment Viewer map showing the surrounding historic structures / features, each numbered to correspond with the table above.

***Extract from Heritage Report: Heritage sites in area. The landscaped Glendruid valley with its heritage elements is being so seriously eroded that it will lose its integrity. A more sensitive development strategy is called for.***



## Inaccuracies in Heritage Report Assessment

Inaccuracies in the Heritage Assessment report list must be addressed:

No. 1 Quaker Cemetery... This is not as the application claims a "former Burial Ground". The cemetery is a family cemetery and remains in use with burials in very recent time.

No 2. & 3, Glendruid House and Lodge: These structures are part of the Glendruid estate, which included the Barrington Tower. They formed part of a carefully designed estate with landscape features. The relationships between the buildings has some relevance and interest.

No 6. Glendruid Dolmen: It is inaccurate and hugely misleading to treat this significant national as of no interest or not applicable (NA). It may be more appropriate to insert: *"Ancient tomb of first farming community to inhabit the area. Outstanding example of a portal tomb. Outstanding example and set in Dublin city. Ideal for education, amenity and spiritual access. Of local, regional, national and international importance and interest"*.

The monument is within 200 meters of the proposed development site. It is not afforded the attentions necessary. The application is therefore not including relevant heritage matters and is the assessment report is therefore flawed and invalid.

NAME / ADDRESS	RPS	NIAH Reg. No. / RMP Number	NIAH RATING / INTEREST
1. Former Burial Ground Brennanstown Road, Cabinteely, Dublin 18.	RPS: N/A	NIAH: 60260219	Regional: Architectural, Artistic, Historical, Social
2. Glendruid, Brennanstown Road, Cabinteely, Dublin 18.	RPS: 1730 - 'Entrance Gates (Note: House also Protected Structure)'	NIAH: N/A	N/A
3. Glendruid House, Brennanstown Road, Cabinteely, Dublin 18.	RPS: 1730 - House (Note: Entrance gates also Protected Structure)'	NIAH: N/A	N/A
4. Brennanstown House, Brennanstown Road, Cabinteely, Dublin 18.	RPS: 1715 - 'House and Out Offices'	NIAH: N/A	N/A
5. Water Pump, Brennanstown Road, Cabinteely, Dublin 18	RPS: N/A	NIAH: 60260221	Regional: Artistic, Technical
6. Portal Tomb / Dolmen Brennanstown Road, Cabinteely, Dublin 18.	RPS: N/A  Located on valley floor. Massive wedge-shaped granite <u>roofstone</u> covers chamber. It rests on two front portal stones and three <u>sidestones</u> .	DU026-007	N/A

**Extract of table from Application**

## Protected Structure – Barringtons Tower

The proposed design does not “*enhance the protected structure*”, as claimed below in the Application. The Tower was designed as a viewing tower to the Glendruid lands and mountains. These views are blocked by the blocks that would envelope the protected tower.

The application is misleading in this regard. An unbiased application would admit that the development will negatively affect the special character of the tower and deny it the views for which it was designed and built.

The application does not give clear indication as to the new and adapted uses of the Protected Structure. Health and Safety given as reason for limited public access. Consideration could be given to the original purpose of the tower: the appreciation of the woodlands valley and location. Embracing the Barrington family heritage and the heritage of the valley could be compatible adapted uses for the protected structure. What will the tower be used for ? This is not addressed in the application?

Heritage	
<b>Policy AR1</b> It is Council policy to: i. Include those structures that are considered in the opinion of the Planning Authority to be of special architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest in the Record of Protected Structures (RPS).  ii. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.  iii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the Department of the Arts, Heritage and the Gaeltacht ‘Architectural Heritage Protection Guidelines for Planning Authorities’ (2011).  iv. Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.	<p>Retaining the protected structure of Barrington Tower creates a focal point for the residential development which incorporates a protective radius surrounding the Protected Structure.</p> <p>The proposed design includes stepping down of heights to enhance the protected structure, as well as the surrounding public plaza.</p> <p>All works will be carried out by qualified professionals with specialised conservation expertise.</p> <p>Howley Hayes Cooney have also submitted a heritage assessment relating to the protected structure on this site.</p>

***Extract from Application.***

## Appropriate Documentation

As stated above the Heritage Assessment underrepresents the significance of the Glendruid Dolmen and its setting, and the impact of large scale development encroaching on the heritage and woodland setting. The EIAR is seriously flawed in this regard.

<b>Policy AR2</b> It is Council policy to require all planning applications relating to Protected Structures to	A Heritage Assessment carried out by Howley Hayes Cooney has been submitted with this application.
contain the appropriate level of documentation in accordance with Article 23 (2) Planning Regulations and Chapter 6 and Appendix B of the Architectural Heritage Protection Guidelines for Planning Authorities, or any variation thereof.	Chapter 15 of the EIAR accompanying this application also assesses the architectural heritage impact of the proposed development.

### *Extract from Application*

The Heritage Assessment is too limited in its scope. The significant archaeological requirements are under played. The

## Misleading characterisation of restoration of purpose of Tower

The application is highly misleading for the reader. It claims the tower will be “restored to its original purpose as a place to enjoy views and an eyecatcher in the landscape”. This is highly misleading. There will be limited public access and the views will be blocked by the proposed residential blocks to the south. The purpose of the tower was to view the estate and mountains.

The structure will be restored to its original detail and purpose – as an eye-catcher or folly in the landscape and a place from which to enjoy views. By clearing the area around the tower, and conserving of the historic fabric, the structure will once again become a significant landmark in the area, where it will be visible from the Brennanstown Road. Internally the floors and access staircase will be restored, but due to health and safety restrictions, any public access to the interior will have to be managed carefully, and on a limited basis.

*Extract from the Developers Heritage Report.*



### **Overbearing impact on the protected heritage structure Barringtons Tower.**

View below of Barringtons Tower from Brennanstown Road entrance. Barringtons Tower should be visible as a eye catcher. It is instead dwarfed in this view by the large blocks behind it. A wider gap in the buildings aligned with the view angle from the road would improve this perspective. Maximisation of building density has apparently been the priority over urban design and placemaking.



*CGI view 1 of the tower from Brennanstown Road, through the axial landscaping*

The scale and design of the building are overbearing and diminish the protected structure.

## Misleading CGIs and Missing Verified Views

The applicant uses CGIs of a wholly positive framing perspective. The image below is used as a representative image for promotion of the development. This is misleading. The 5 storey buildings shown are higher than the tower and the 9 storey buildings to the right are omitted are not included. This selective framing is insufficient to evaluate the development application. Where are the view of the higher buildings and showing the minimum separations between buildings.

Board Pleanala should required CGI views looking back at the development from the South and from outside the lands.



CGI View 5 - Proposed View from the east, looking west at the tower

The application omits CGI showing the massing of the building on the site and the narrow space between buildings.



Sections between  
Blocks F and E



1 Proposed West Elevation - Block F  
1 : 200

## Misleading claims as to motives of the design

The application misleadingly claims that “**a key driver** of this development was to enhance the setting of the Barrington Tower”. There is no evidence of such a key driver. The tower is dwarfed by the new buildings.

The apartment blocks have been carefully located to provide an attractive frontage to the Brennanstown Road and large, useable open spaces throughout the development providing views and an appropriate setting to Barrington Tower, which will be restored as part of this development. All of this is achieved by using the height to account for and address the steep slopes within the topography of the site.

The proposal includes a public park, a new retail unit, creche and new pedestrian connections through the site and to the south.

A key driver of this development is to enhance the setting of Barrington Tower as well as restoring it to create an attractive feature and focal point within the development, while also providing visual interest in the proposed buildings through the stepping of the buildings.



## Views to the West from the National Monument

The National Monument is currently set in a sylvan setting at the base of a river cascade on the Carrickmines river. It is a refugium on the edge of and partly included in the Cherrywood SDZ.



*Image of Glendruid Dolmen facing west.*

Verified views are required to assess the impact of the Development Application from views to the west of the National Monument. Image below attempts impression of affect of developments.

Is this what encroachment on one of Ireland's most precious heritage sites looks like ?



2021

2022

2030 ?

2040 ?

## Failure to protect and preserve the enjoyment of views is significant Material Contravention

### The Developers response to the contravention of the Policy Objectives are not correct

. The development blocks do not frame the view or value the views from surrounding areas,  
Views from Glendruid Dolmen and Valley area are adversely affected by high rise development

<b>Policy Objective GIB6:</b> It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.	The proposed development incorporates framing and valuing surrounding views into its design. This includes taking advantage of the topography to frame views to the Dublin mountains.
<b>Policy Objective GIB18:</b> It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.	Please see the Natura Impact Statement submitted as part of this application.

Extract from application. Applicant does not respond adequately to the impairment of views from and along the valley. There is no awareness shown of the national monument and its setting and relationship within a network of neolithic tombs.



### **Aerial and elevated perspective and showing context**

The application fails to show the development in the context of its surroundings using elevated views and aerial perspectives. A CGI photo-montage of the development showing its scale and height in the context of the area should be considered essential to properly assess the development.

This is not included in the application. For a project of this size and given the extremely sensitive context of woodlands, national monument and private burial grounds, in addition to low rise residential development, several elevated perspectives are essential.



*Aerial view of development area.*



### **Protected Views and ancient alignment from Glendruid Dolmen**

The Glendruid Dolmen has an alignment with the peak of Two Rock. As the dolmen is lower in the valley, an elevated view is required to appreciate this. This view to the west should be considered a protected view and a development in close proximity, ie. with ca. 400 meters, must be considered for their impact. This was not done in the Heritage Assessment or EIAR. The construction as proposed is the equivalent of bookending or walling off the end of the valley with monolithic structures.

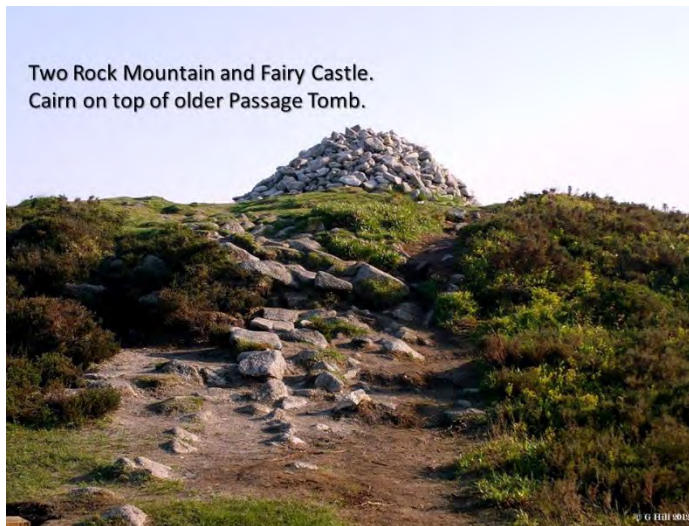


*Image showing a view requiring protection from the National Monument area to the west and Cairn at Two Rock.*

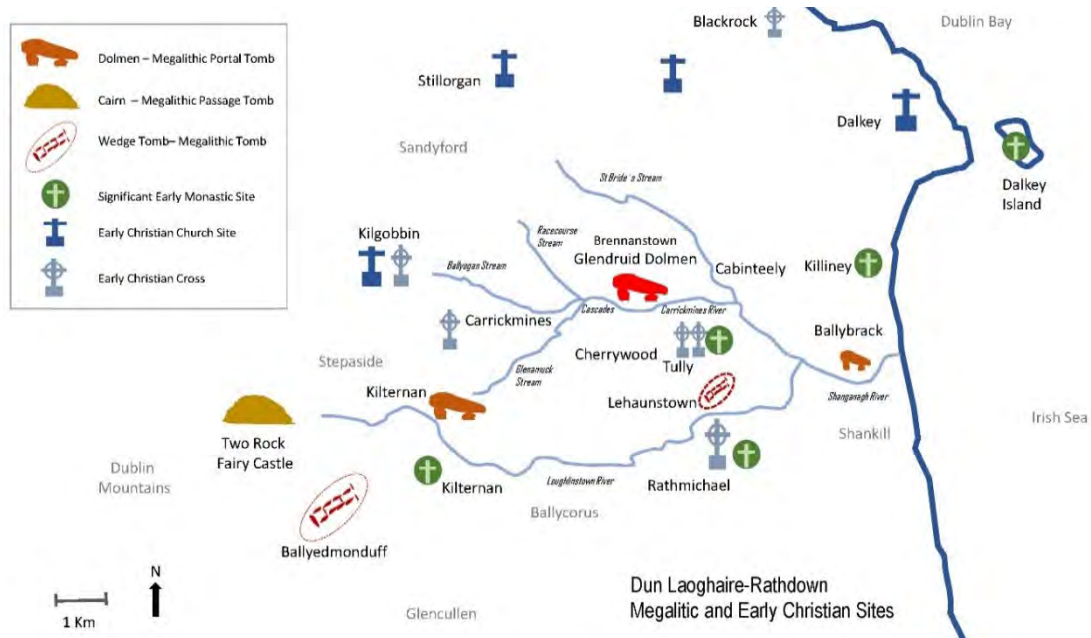


## Cairn and Passage tombs in nearby mountains

We will let the irony pass that it is Cairn Homes Plc that is applying to interfere with a network of megalithic tombs including Cairns and Dolmens with in appropriate monolithic structures.



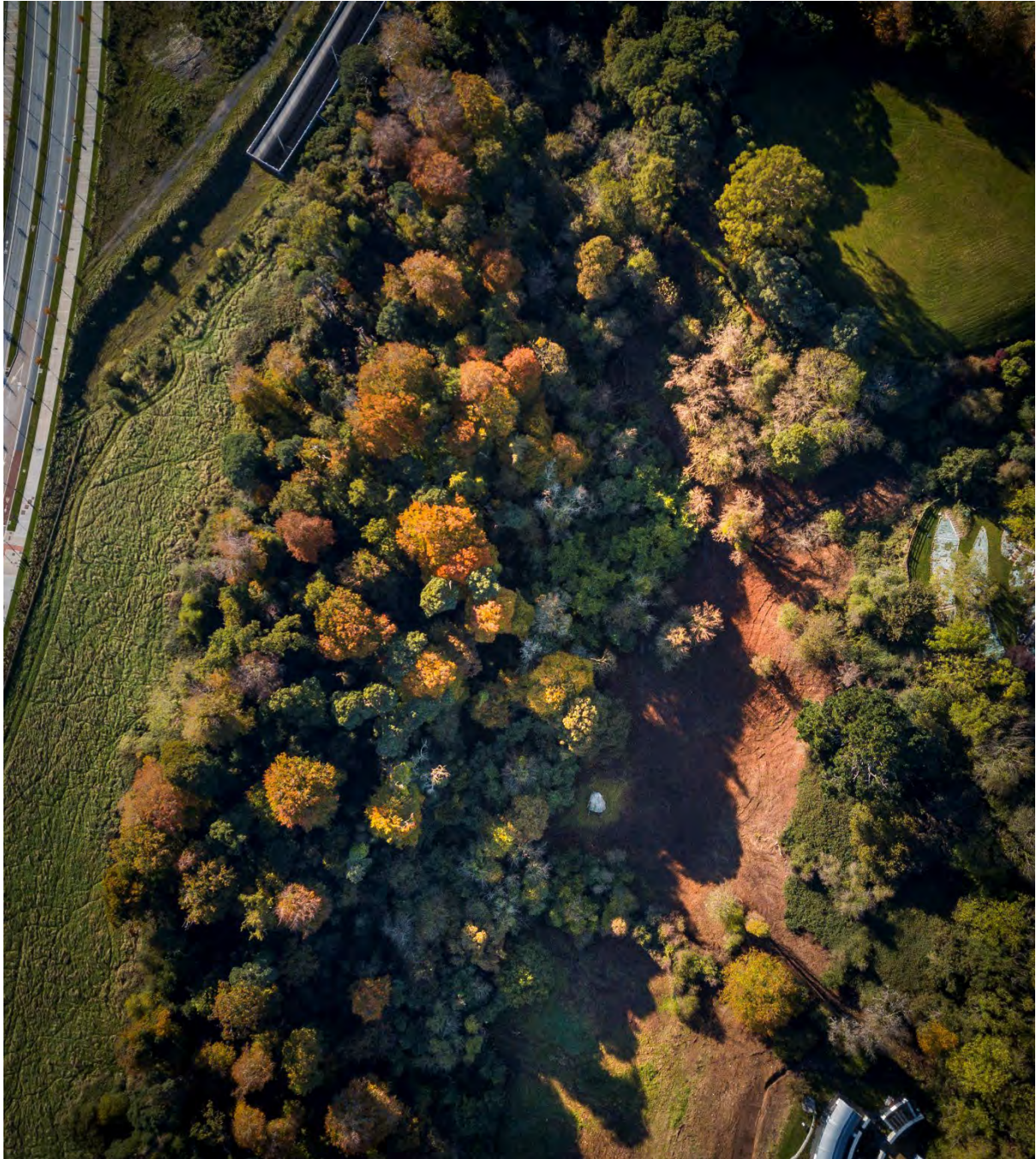
Cairns in Dublin Mountains are part of ancient funeral network.



*Illustration of the network of megalithic structures from the neolithic period in South County Dublin, with Glendruid in a central position.*



**Aerial View of showing area of sensitive Heritage and Biodiversity areas**



***Aerial View***



Distinctive landscape

The Cherrywood SDZ report highlights the distinct character of the valley and takes more approach to zoning and protective views. Building of 2-3 storeys maximum are permitted wit Res 1 density of 30 units per hectare. This should provide a guidance for the planning of Barrington Tower area.

Part 2 – Protected Structures

The list of protected structures which fall within the Planning Scheme area are set out in the 2010-2016 Dún Laoghaire-Rathdown County Development Plan.

Structure Name	Location	Description	Map No.	RPS. No.
Priorsland	Gerrinuck Road, Carrickmines	House, Out-Offices and Gates	9	1746
Station House (Former Carrickmines Railway Station)	Glenamuck Road, Carrickmines	Railway Station (former) House	9	1743
Glendruid	Brennanstown Road, Cabinteely	House (Note: Entrance gates also Protected Structure)	7	1730
Glendruid	Brennanstown Road, Cabinteely	Entrance Gates (Note: House also a protected structure)	7	1730
Lehaunstown Park* (Lehaunstown Castle)	Lehaunstown Lane	Castle-Tower House	10	026-093
Bride's Glen Viaduct	Cherrywood Road	Viaduct	10	026-1783
Tully Church *	Lehaunstown Lane	Church, High Cross, Grave-Slabs	10	026-023
Brennanstown Dolmen*	Brennanstown	Portal Tomb	10	026-007
Lehaunstown*	Lehaunstown	Wedge Tomb	10	026-024

\*These structures are also listed in the Record of Monuments and Places and are dealt with in the section on Archaeology. Map 3.2 shows the location of Protected Structures in the Area.

Below is the list of additional Protected Structures which border the Planning Scheme area. Regard should be given to any potential visual impact on the character and appearance of these structures.

Structure Name	Location	Description	Map No.	RPS. No.
Cherrywood House	Cherrywood Road	House	10	1788
Rathmichael Glebe House	Bridgesen Road	Rectory (former)	10	1787
Mullinstill House	Mullinstill Road	House	10	1791
Brenanstown House	Brennanstown Road	House and Out-Offices	7	1715
Barrington's Tower	Brennanstown Road	House	7	1729

Glendruid

Glendruid and its entrance gates are included as Protected Structures on the Dún Laoghaire-Rathdown Record of Protected Structures.

Glendruid was built by John Barrington in 1808. Barrington was a businessman and originally belonged to the Quaker tradition. The original estate comprised 126 acres and included the Druid's Glen which was converted by Barrington to a pleasure landscape. Barrington planted trees, set out paths and constructed two cottages in the Glen. He also constructed a viewing tower in 1818 to the west, which he called 'Tillentudelem' after the castle in Sir Walter Scott's novel 'The Antiquary'. This structure was later extended and converted into a dwelling and is known as Barrington's Tower.

Within the attendant grounds of the original estate was Brennanstown Dolmen. The Dolmen is located close to the Carrickmines River, and has a very impressive capstone, which weighs 45 tonnes. The Dolmen is no longer within the Glendruid landholding. Further details of the Dolmen, including a photo, are in Part 1 of the appendix.



Above: Glendruid Estate, First Edition 6" Ordnance Survey Map, 1843

The house itself is five-bay two-storey over basement with a projecting entrance porch, and a bow on its eastern side. It is set on an elevated site within its own mature grounds overlooking Carrickmines River Valley. The house is accessed via the original gated entrance, which includes a single-storey gate lodge. There is an interesting range of outbuildings to the rear of the house, which are accessed through a tall granite arched gateway. The site is bounded by a combination of high stone walls, mature trees and hedges, giving it a great sense of enclosure.



Above: View of front of Glendruid



Above: Southern view from Glendruid to be protected

Landscape Character

Glendruid is set within a distinctive landscape encompassing a river valley and mature woodland to the south, with borrowed views above the tree canopy towards the mountains. The original house is largely screened from the public road with glimpses visible from the river valley on Lehaunstown Lane to the southeast. It is clear that the siting of the house was informed by the existing historic landscape and it is this landscape which should inform all future development in the area.

Druid's Glen

The river valley within the grounds of Glendruid is an important element in the setting of the protected structure. The area contains a number of items of interest which have been identified in the Historical and Architectural Heritage Report[R Goodbody, 2011]. These include two stone bridges and a stone culvert.

Character Areas

The lands around Glendruid can be divided into four Character Areas. These areas are identified as follows [See Map 3.3].

1. Glendruid House, stable yard and lands, which are considered to provide the setting for the protected structure.
2. Southern valley to the west.
3. Southeastern portion of the site.
4. Area to the rear of the house [the former kitchen garden].

Area 1

This area includes Glendruid House, the original entrance gates and gate lodge, the stable yard and the area to the immediate foreground of Glendruid. While the curtilage of Glendruid has not been defined, it is important that the original house has an appropriate setting. It is considered that the southern vista from the front of Glendruid is an historic view, which must be protected.

- The original early 19th century house is vacant and in a very poor state of repair. This is of considerable concern. The best way to protect the building is to keep it in active use.



Above: Glendruid Gate Lodge

Extract from Heritage Section of Cherrywood SDZ.

PART 2

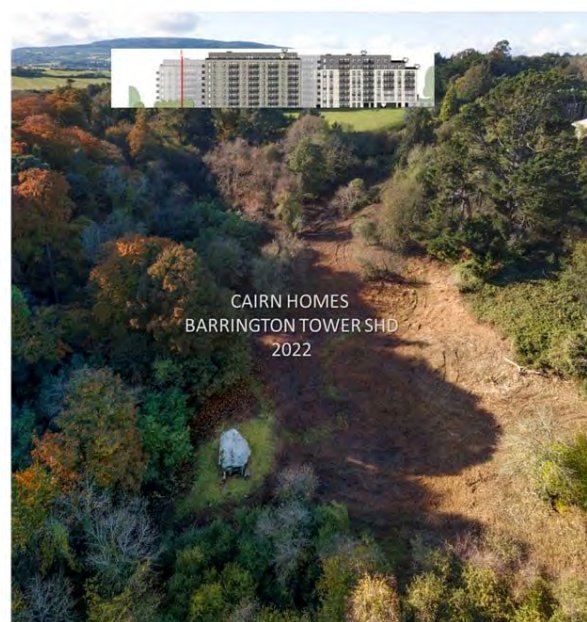
BUILDING SCALE & CONTEXT

### Development Scale and Change of Character leading to encroachment

The images below illustrate the concerns of the GDPG regarding the scale of the proposed development and how it will change the character of the immediate setting of the Glendruid National Monument. Leading initially and over time to a significant adverse impact on a very important heritage site.

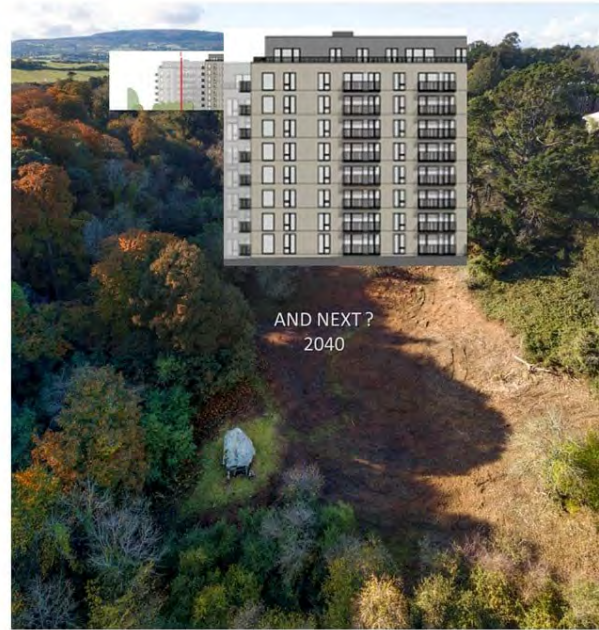
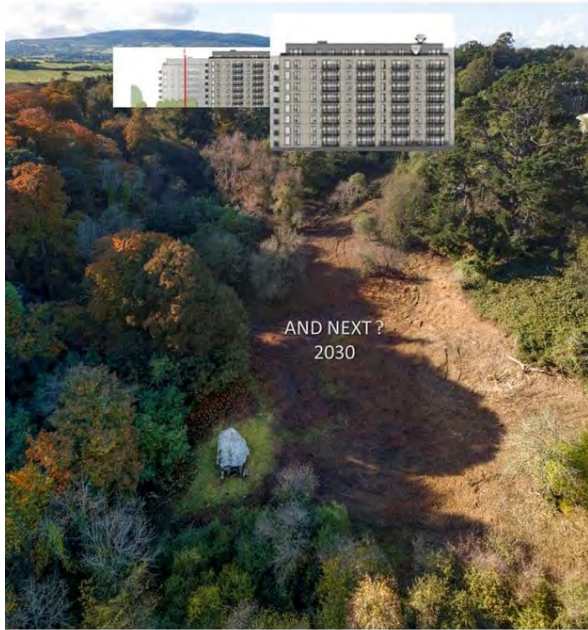


*Approximate aerial view showing the development in the context of the national monument. The application did not include any such studies for assessment.*



*Attempt at a photo montage (verified view) showing development.*





The character of developments on



The current view from Dolmen with its alignment to the Cairn at Two Rock - Fairy Castle. The risk of even further encroachment is obvious !

No verified views provided from this most sensitive perspective.

## Overdevelopment of site

The proposed development has 23% more units than the 2016 planning permission for the site. This is an extraordinary increase on what already then described by DLR CC as a high density development.

The development would be overbearing with this density and height and totally out of keeping with the character of Brennanstown Road.

(b) State cumulative gross floor space of non-residential development in m <sup>2</sup> :	<b>c. 17,016.6 m<sup>2</sup></b>
(c) State cumulative gross floor space of residential accommodation and other uses in m <sup>2</sup> :	<b>c. 70,988.8 m<sup>2</sup></b>
(d) Express 15(b) as a percentage of 15(c):	<b>24%</b>

764,000 sq ft. (71,000 sqm) Total development including commercial and underground parking

(b) State total number of residential units in proposed development:	534
(c) State cumulative gross floor space of residential accommodation, in m <sup>2</sup> :	c.38805.9 m <sup>2</sup>

The 2016 planning permission for this site permitted 149 units, with semidetached houses and one apartment block. This was more in keeping with the scale of development in the area.

The density and heights proposed in the Application far exceed the levels permitted in the planned town of Cherrywood, where 5 storeys are most common in the town centres. The Application is vastly excessive when considered from this perspective. Difficult road access and overly dense development.



## 2015 Planning Permission

The site was acquired by the developer as a ready-to-go site with planning for 158 units.

Mix of houses and apartment block. Now - application for 534 units, a 230% Increase.

Reg. Ref. No. / An Bord Pleanála Ref. No.	Nature of Proposed Development	Final Decision by Planning Authority / An Bord Pleanála
<b>DLRCC REF:</b> D07A/0161  <b>ABP REF:</b> PL06D.227861	Demolish dwelling 'Winterbrook', construct 158 no. residential units, 2 new entrances onto Brennanstown Rd and associated works on lands adjacent to 'Barrington Tower', a protected structure. Barrington Tower, Brennanstown Road, Cabinteely, Dublin 18.	Grant Permission with conditions

*2015 planning permission approved by An Bord Pleanála.*

The proposed development would be for 140 units per hectare this is vastly more than appropriate.

Scale of developments in immediate area



The above graphic gives indication of overall development in area. The importance of moderating development close to Glendruid is clear. Very significant quantum of development is provided nearby, with significantly less impact on sensitive valley area. GDPG call for restraint on Brennanstown Road.



**Adjacent Lands – Overall planning approach required.**

The developer has land to the north and east of the development site. What are its intentions for these lands – is the application to be considered a first phase of an even larger development.



Cairn also controls the properties outlined in blue according to the application

## Significant Material Contraventions

The application material contravenes the DLR County Development Plan in numerous areas. The responses to these contraventions are wholly inadequate.

### Potential Material Contraventions

The site is, as set out in the Statement of Consistency above, zoned for residential development and as such this development is fully in accordance with the zoning for this site. The proposed development may be considered by An Bord Pleanála to materially contravene the Development Plan regarding the following matters:

- Building Height (Policy UD6 and Building Height Strategy)
- Dwelling size, mix and density (Res 7, Section 8.2.3.2 (1) and (ii))
- Car Parking Standards (Table 8.2.3 and Table 8.2.4)
- Apartment Development Quantitative Standards (Section 8.2.3.3 – Dual Aspect, Separation between blocks, mix of units and minimum apartment floor areas)
- Brennanstown Road improvements (SLO 130 and ST25)
- Public/Communal Open Space – Quantity (Section 8.2.8.2)
- Convenience Shop Section (Sections 8.2.6.1 and 8.2.6.3)

*List of all areas the planning application contravenes the Development Plan...*

In particular this height contravention needs to be addressed.

Extract from Application:

#### Material Contravention

The proposed general height of the scheme at 3-10 (9 storeys plus lower ground floor) storeys, would, in the main, be in excess of County Building Height Limit of 3-6 storeys (allowing for the additional “upward modifier”) and would therefore be a material contravention of the Development Plan.

#### Justification for Material Contravention

The Board is referred to current national planning policy is clear and united in its support for increased building height and density to achieve the necessary increase in residential development levels at appropriate urban locations across Ireland, and in particular in Dublin. In particular we refer to Section 28 Ministerial Guidelines – National Planning Framework and *Urban Development and Building Heights: Guidelines for Planning Authorities* (2018).

The justification is completely flawed. Attention is drawn to the guideline: “at appropriate urban locations”. Brennanstown road is not an appropriate urban location by reason of road infrastructure, pedestrian and bicycles access, retail, unresolved access to LUAS for all, heritage site proximity, character of the area etc.

**PART 3**  
**TREES AND NATURAL ENVIRONMENT ISSUES**



**Glendruid Valley's ancient Woodlands – Barringtons Tower trees are part of whole valley.**



Glendruid Valley is a magical woodland valley in the heart of south county Dublin, with the Carrickmines river flowing through it, and steep valley sides with their tall Scotts Pines. Overlooked at one end by Barrington's Glendruid House, and in the valley floor a portal tomb from our long past ancestors. To end this vista with a wall of 10 storey monolithic structures would be highly inappropriate and against planning policies.

Extract on the ecological value of Glendruid Valley and a proposal for an ecological buffer zone. Its from an 2011 Cherrywood SDZ report.

"The Glen contains both freshwater and woodland habitat types including .. (mixed) broadleaved woodland. These habitats support a range of fauna that are found only in the Glen in the context of the whole SDZ area.

Tree species included Beech, Ash, Scots Pine, Oak, Sycamore and Wych Elm. The understorey on the slopes of the valley was dominated by Holly with occasional Hazel and Elder. The ground layer on these slopes was heavily shaded and only Ivy was found. On the valley floor there was a path sloping along the southern side and there were areas of Cherry Laurel that have become established. This invasive shrub out-shaded much of the central portion of Druid's Glen. Further upstream and downstream the valley floor contained a diverse ground flora with Bramble, Honeysuckle, Male-fern, Great Wood-rush, Soft Shield-fern, Hard-fern, Hart's-tongue. In Spring the woodland flora supported Sanicle, Lords-and-Ladies, Herb-Robert, Wood Speedwell and Enchanter's- nightshade. Wood anemone was found in both its white form and the non native Blue Anemone..

Three invasive species were found in this woodland in Druid's Glen: Giant Hogweed, Cherry laurel and occasional Rhododendron. The latter two are woody species that had out-shaded the native

ground flora and limit its ecological value.”

The full report is here.

[https://www.dlrcoco.ie/.../files/atoms/files/appendixd\\_0.pdf](https://www.dlrcoco.ie/.../files/atoms/files/appendixd_0.pdf)

The SDZ plan now includes a buffer zone along the south side of the woodlands on the upland to the Laughanstown town centre area. The south side of Valley the main area of woodland is zoned Objective F, open space and amenity. The north side of the valley remains zoned residential both within the SDZ and the areas outside the SDZ and around the Dolmen. The woodland around the quaker cemetery is zoned open space and public amenity.

Barrington’s Tower land is part of this great natural parkland setting. Due recognition of this is not reflected in the Application. The removal of trees has to be seen in the wider valley context and the serious contribution to degrade the natural amenity of the area.

Looked at on its own it may not appear significant, however it is the aggregation of all the tree felling proposals that destroys the character of this special valley.



## Natural Heritage Area

The Glendruid Valley woodlands is a refuge of wildlife in South County Dublin and there is a risk of habitat loss within the valley due to large development in close proximity. The proposed development along its southern perimeter has the potential for designation as a Natural Heritage Area. The development as applied for would damage the natural heiritage of the area. This opportunity requires further investigation. The Cherrywood SDZ environmental and biodiversity studies identified Listed Species habitats adjacent to the proposed development.

<b>Policy Objective GIB24:</b>	The proposed development includes measures
It is a Policy Objective to maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat and nature-based solutions that incorporate biodiversity features. It is also policy (subject to the sensitivity of the riverside habitat), to provide public access to riparian corridors, to promote improved passive recreational activities.	<p>to ensure the protection of the ecological value and natural character of Carrickmines Stream south of the site. Significant reprofiling works are proposed on site to prevent contamination of the stream.</p> <p>Please see Waterman Moylan reports accompanying this application for details.</p>

Not much mention of protection of the woodland and biodiversity. The Carrickmines River at this point descends over a series of cascades. The development must not impact the river.

Protection of Trees

REPORT ON THE SURROUNDING TREES

An arboricultural assessment was carried out by The Tree File. The report identifies that there are Monterey Cypress on the site which dominate the Barrington Tower area. There is concern about their sustainability and suitability for retention within a development context *“undoubtedly, some must be removed to allow for the efficient development of site space, however the species is intolerant of fragmentation and shelter loss and therefore the effects of such impacts will have repercussions on any trees which might appear retainable. Accordingly, it is advised that an all or nothing approach be taken regarding this particular species.”* The report goes onto highlight that *“it appears unlikely that the central area of the site offers many opportunities for tree retention. This aspect of the development has been appreciated by the project Landscape Architects and addressed by way of an extensive tree planting scheme as part of the landscaping proposals.”*

In otherwords.. All trees are for felling. This is excessive and needs further investigation.

<i>Appropriate responses are made to the nature of specific boundary conditions.</i>	The development has been designed with regard to the existing natural features, particularly the retention of Barrington Tower, the existing trees to retain the Sylvan character and site boundaries. The high quality trees in the main have been retained and set a suitable landscaped boundary around the northern part of the development to ensure the character of Brennanstown Road is retained.
--	---

This response is misleading. The Sylvan character is not retained. How do 10 storey towers have a sylvan character. This application is completely misleading to a reader, and on these grounds fails test of validity.

A map should show where trees are retained. There is conflict between written statements.and landscape plan.

The response in the Application to the Policy Objective is completely misleading. The “where possible” is not defined. Where is suits the design of the development would be more accurate. The proposal does not propose to retain significant trees.

<i>Enhance and protect the green infrastructure and biodiversity; and</i>	The proposal includes the retention of existing trees where possible. The proposed landscaping has been carefully considered to add to the green infrastructure
---	---

The Applicant frames the decision on retention of trees on an unsound “all or nothing basis”. This is a false dichotomy. There is a range of alternatives and retention of specimen trees is one such alternative. The conclusion is that all the mature Monterey Cypress trees will be felled. More sensitive approaches are possible.

The applicants response is flawed.

Response to Specific Information Required 5: Tree loss, layout, location, hierarchy and open space

An Bord Pleanála stated the following:

5. *Justification of tree loss, layout, location and hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standards*

The Tree file are the arborists on this site. The report confirms that there are Monterey Cypress on the site which dominate the Barrington Tower area. There is concern about their sustainability and suitability for retention within a development context “*undoubtedly, some must be removed to allow for the efficient development of site space, however the species is intolerant of fragmentation and shelter loss and therefore the effects of such impacts will have repercussions on any trees which might appear retainable. Accordingly, it is advised that an all or nothing approach be taken regarding this particular species.*” The report goes onto highlight that “*it appears unlikely that the central area of the site offers many opportunities for tree retention. This aspect of the development has been appreciated by the project Landscape Architects and addressed by way of an extensive tree planting scheme as part of the landscaping proposals.*”



## PART 4

### TRAFFIC ISSUES

This submission will not focus on traffic issues. This matter is self evident. The road system is completely inadequate to support the development proposed.

It would create a danger for pedestrians attempting to walk to the nearest village at Cabinteely.

The road has no foots paths in sections and is exceptionally narrow.



Road at the proposed entrance. Clearly inadequate even with new junction.



Dangerous for cyclists and pedestrians. On these grounds alone the development is too early and would cost lives and injuries, and force car based short trips.

No cycle facilities along Brennanstown Road. In parts, not even pedestrian pathways.

#### CYCLE FACILITIES

At present, there are no cycle facilities along the Brennanstown Road. However, there are excellent existing cycle facility lanes provided along Glenamuck Road and the N11. These existing cycle facilities proximate to the site will ensure that the subject site is accessible to the wider cycling network. In addition, given the upgrades permitted in the two earlier SHDs to date ( Brennanstown Wood ABP-301614-18 and Doyle's Nursery ABP-205859-20) and the further upgrades proposed in this application, Brennanstown Road will provide for a low vehicular speed and safe environment for cyclists to/from the development.

The claims of this part of application are exaggerated and do not address the issue of safety of use of Brennanstown road for cyclists.



## **Council Summary of status of Brennanstown Road**

The report dealing with the traffic situation on Brennanstown Road was addressed in the Part 8 planning process in 2017. The details of that review are submitted as material grounds for a refusal of the BT SHD. The issues of traffic and the objectives of the County Council remain valid. The site location description also describes well the character of the road and we give that again a reason to reject the current application as inappropriate.

### **MEETING OF DÚN LAOGHAIRE-RATHDOWN COUNTY COUNCIL**

**13 MARCH 2017**

### **PROPOSED BRENNANSTOWN ROAD TRAFFIC MANAGEMENT SCHEME**

**Report submitted in accordance with Part 8 Article 81 of the Planning and Development Regulations, 2001 (as amended), the Planning and Development Acts, 2000 (as amended) and Section 138 of the Local Government Act, 2001.**

## **2. SITE LOCATION AND DESCRIPTION**

The site location is the full extent of Brennanstown Road between the junction of Bray Road/Johnstown Road and the junction of Glenamuck Road/Claremont Road/Brighton Road. The road is approximately 1.9km long. The majority of Brennanstown Road has a very attractive and desirable semi-urban /semi-rural character with a sylvan nature and historic character. There are two protected structures along the road which act as the road/property boundary (Brennanstown House Outhouses/Stables/Yard Buildings and Glendruoid House Gated Entrance).

The majority of the road is bounded on both sides by low density individual detached residential properties, but three medium density residential developments (Carraig Glen, Holmwood/Lambourne Wood and Carrickmines Wood) and one lower density residential development (Brennanstown Vale) are also accessed off the road. Planning permission has been granted for one high density residential development along the road, at Barrington Tower.

Currently a footpath is provided along one side of the road for the majority of the route; however, it terminates for a section of 170m due to road width restrictions. The footpath, in general, is narrow in width, approximately 1 – 1.5m throughout Brennanstown Road with the condition of the footpath varying from adequate to poor. In parts, the footpath is at the same level as the road, offering pedestrians no protection from passing vehicles. The speed limit on the road is 50km/h, and the road has an Annual Average Daily Traffic (AADT) of approximately 4,800 vehicles. The road is located between the N11 and M50 motorway, and this leads to some rat running along the route.

## **3. ZONING AND OTHER OBJECTIVES:**

The proposed traffic management scheme is within the full extent of Brennanstown Road. The majority of the lands on either side of the road are zoned 'A' – 'To protect and-or improve residential amenity', and the road also has a section with a boundary to Cabinteely Park, and a short section with a boundary to the Cherrywood SDZ lands.

The provision of a Traffic Management Scheme for Brennanstown Road is included under Policy **ST25: Roads** of the County Development Plan 2016-2022 as a stated objective:

*It is an objective of the Council to preserve the existing character of Brennanstown Road whilst undertaking a Traffic Management Scheme that will:*

- *reduce traffic speeds and improve road safety.*
- *provide improved facilities for vulnerable road users.*
- *reduce through traffic.*
- *facilitate the development of zoned lands.*

*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.*

*The Brennanstown Road Traffic Management Scheme may determine the future development potential of the area and therefore it is also an objective of the Council to limit developments along Brennanstown Road to minor domestic infills and extensions until the Scheme has been completed and its recommendations implemented (Refer to SLO No. 130 Maps 7 and 9).*

The proposed scheme utilises the existing road area to improve the overall safety of the road and in particular of vulnerable road users.

## Appendix 1

### Glendruid House off Brennanstown Road in Cabinteely.

Built in 1808 by John Barrington, a quaker, successful Dublin soap manufacturer, and the visionary behind Glendruid estate. The property is a relatively restrained family home reflecting the quaker values of its owner and the fact that lands were leased, and not acquired until much later after his death.

According to the website of the National Inventory of Architectural Heritage: “Glendruid House is a delightful detached two-storey Georgian house, situated above an unspoilt and picturesque glen which stretches westward towards Carrickmines with unrivalled views. The House is five windows-wide and has a bow end with a pretty, ionic-pillared porch. The plan form of the House is compact, centred on a classically-detailed doorcase demonstrating good quality workmanship. The elementary form is still intact, in addition to the urn-topped parapeted roofline, restrained chimneypieces, and plasterwork refinements. The deliberate alignment of the house is to maximise the scenic vistas overlooking the rolling grounds and a richly-wooded tributary of the Loughlinstown River.”

Unfortunately, in our research, we could not source any information or photos on the interior of the House. If anyone has any information/photos of the House’s interior, please do post and share. We would be delighted to hear about your memories.

Although Glendruid House is a protected structure, it has been left derelict and boarded up since at least 2003. According to the DLR CC Cherrywood SDZ appendix B Cultural Heritage, it is stated that; “The original early 19th century house is vacant and in a very poor state of repair. This is of considerable concern. The best way to protect the building is to keep it in active use”. It would be a shame to witness the demise of yet another fine house, representing an important component of the early nineteenth-century domestic-built heritage of south County Dublin.





## APPENDIX 2

### Images of Glendruid Dolmen and Valley

For the purpose of giving ABP and impression of the valley and importance of setting and context some images are included in this appendix.

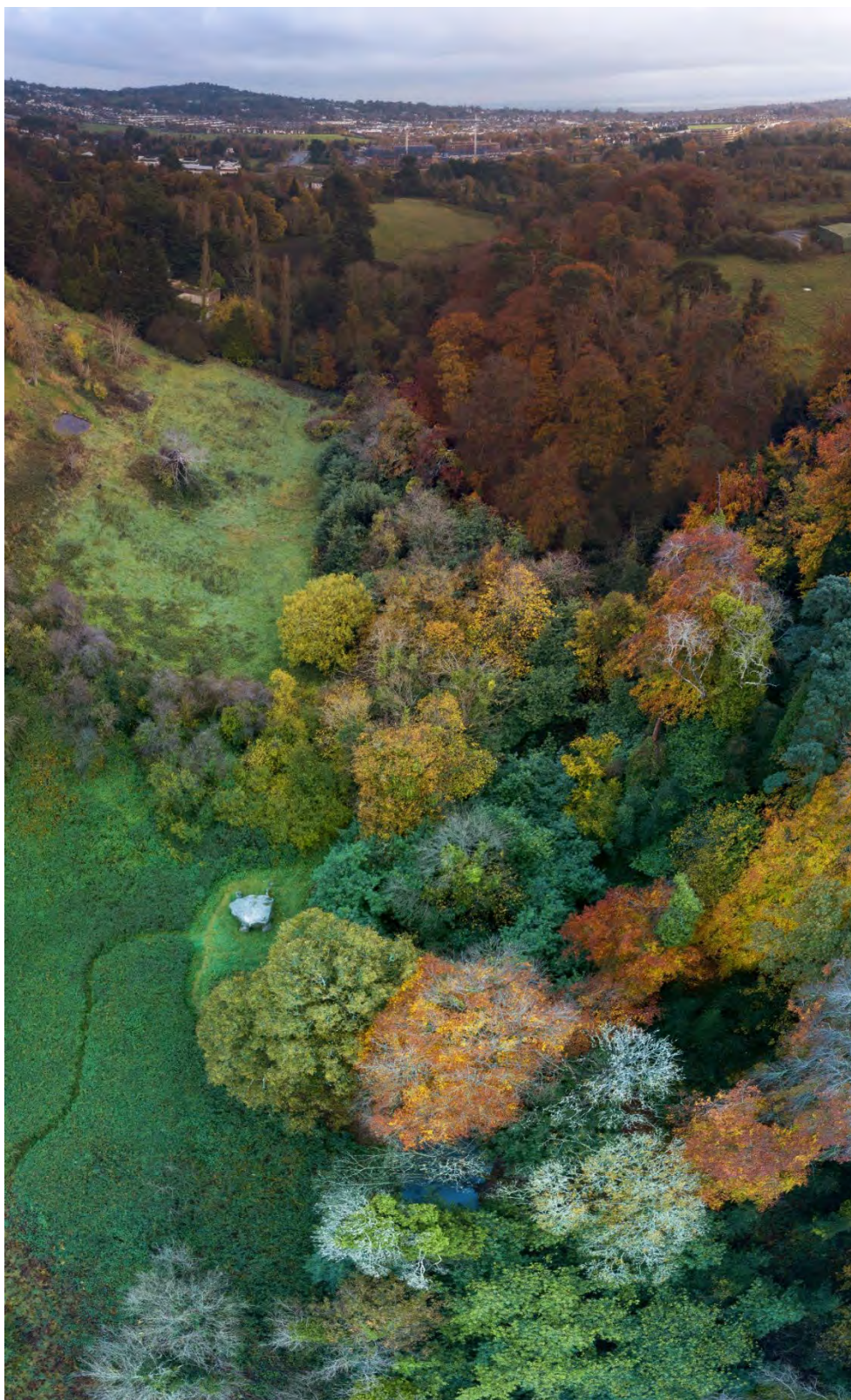


Heritage is for passing securely from one generation to the next.



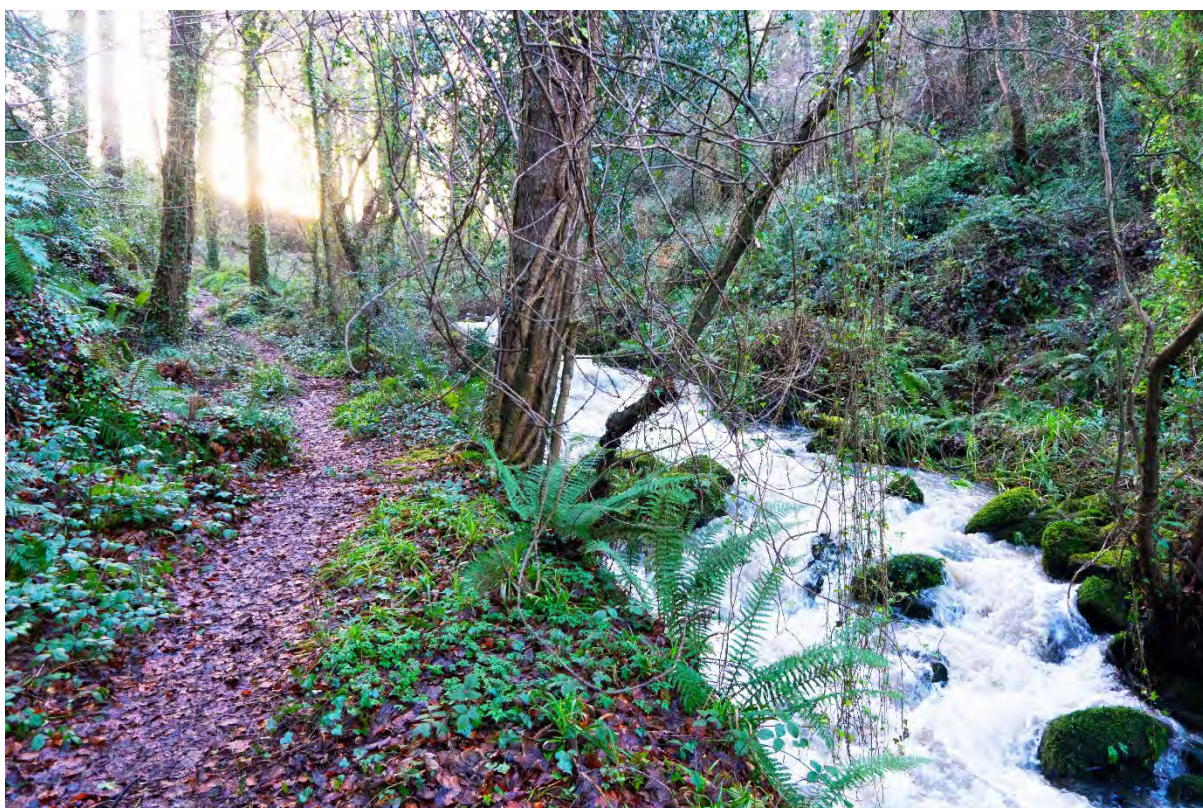
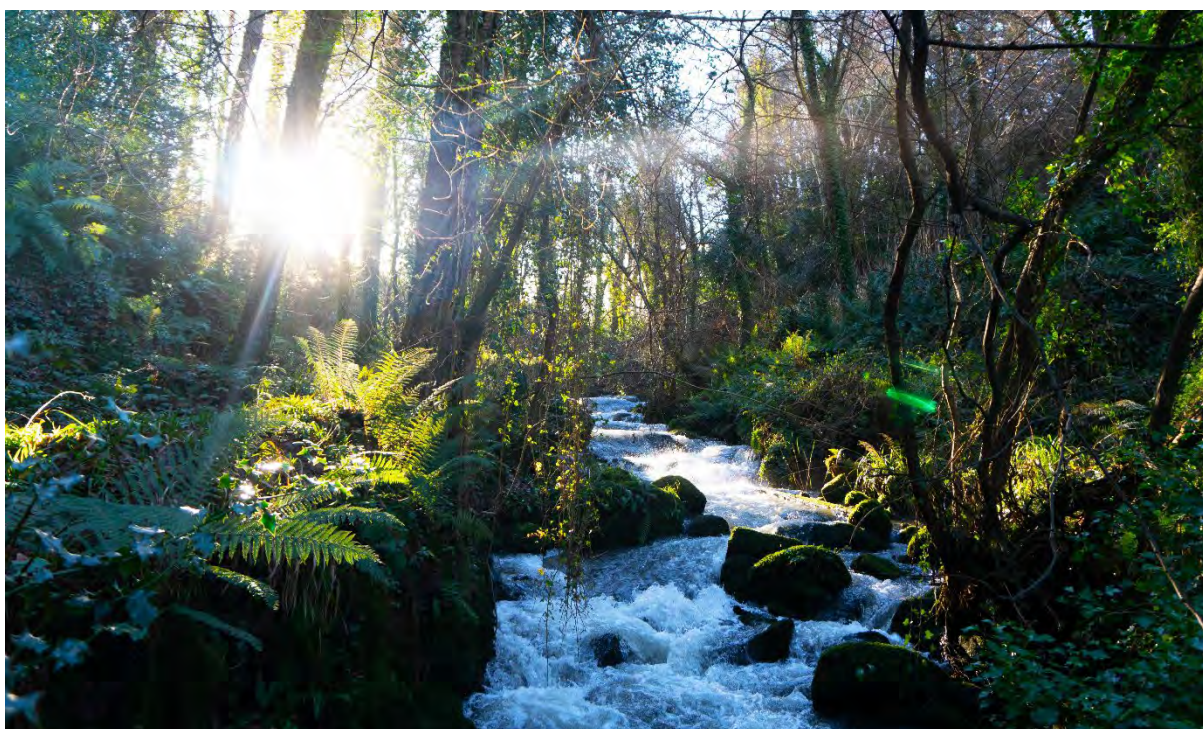
Built 5,500 years ago, this tomb and its important setting deserves the protection of An Bord Pleanála.





Glendruid view up valley to the East.





Scenes from Glendruoid Valley water cascades.



## Quaker Burial Ground

The Application fails entirely to deal with the proximity to the private Quaker burial ground and its very special private isolated space. Impact on security in particular is not addressed.

