



Observation on a Strategic Housing Development application

Observer's details

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

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

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

(a) Observer's name

Jane Reid

(b) Observer's postal address

Druid Glen, Brennanstown Road, Cabinteely, Dublin 18, D18V0T0

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

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

You (the observer) at the postal address in Part 1

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The agent at the postal address in Part 2

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Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

313281

- (b) **Name or description of proposed development**

534 no. Build to Rent apartments. "Barrington Tower", Brennanstown Road, Dublin 18.

- (c) **Location of proposed development**

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

"Barrington Tower", Brennanstown Road, Dublin 18.

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write. You can also insert photographs or images in this box.

(See part 6 – Supporting materials for more information.)

I am making this submission to assert that the density of the proposed Cairn Homes development on Brennanstown Road must be reduced. It is important to point out at the outset that I fully understand the urgent need for housing. I also fully understand the environmental benefits of compact housing plans, however this development is politically driven and contravenes much of both the letter and the spirit of the Dun Laoghaire-Rathdown County Development Plan 2022-2028 so recently adopted.

The Dun Laoghaire-Rathdown County Development Plan is an immensely complex and detailed document compiled professionally by the county officers, councillors and staff, which makes a valiant attempt to reconcile the many competing interests of the inhabitants of the county in the context of both European and national legislation. However the proposed Barrington Towers development represents the worst possible approach to planning and building in our economy and society. This “business as usual” approach ie massive profits for the developer with no regard for, or in this instance, consultation with, existing communities will not lead to “sustainable communities” as outlined repeatedly in the County Plan.

Despite the Ecological Impact Assessment prepared by consultants for Cairn Homes the impact on the immediately adjacent Glendruid valley habitat, which has been designated as a Locally Important Biodiversity Site by the County Council (Ecological Network Map, County Plan) is largely ignored. There are no details in the applicants reports of the biodiversity in the valley itself nor of the wider impacts on wildlife and ecological corridors especially given the overall scale of other greenfield developments in the area (8000 homes in Cherrywood and many more on Glenamuck road - Ecological Network Map, County Plan). The applicants reports focus on distant SAC’s which of course are significant but not exclusively so.

The Glendruid valley is also the location of a significant national monument, the Glen Druid Portal Tomb. The reports commissioned by Cairn Homes again discount this monument as being “N/A”, not applicable (page 29). I refer to the Howley Hayes Cooney “Architectural Heritage Impact Assessment”. In the Statement of Significance contained therein, they use an assessment tool known as the Burra Charter. The charter states that

“Cultural Significance is a concept, which helps in estimating the value of places. The places that are likely to be of significance are those which help an understanding of the past or enrich the present, and which will be of value to future generations. Cultural significance means archaeological, aesthetic, historic, scientific, social or spiritual value for past, present and future generations. The guidelines go on to state that what is significant about a place should help determine how to look after it and what changes are appropriate. Cultural significance is assessed through a number of different categories including –

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aesthetic, historic, scientific, social or spiritual value for past, present and future generations, many of which may overlap or be interdependent. It is important to establish the significance of the tower and house within these parameters, and to understand the opportunities and constraints that are found there, in order to develop a suitable conservation and development strategy for the structure and its setting.”

Whilst Burra is a very comprehensive assessment tool, in my opinion the report writers have not adhered to its principles, but rather narrowed them to favour the proposed development. The report goes into great detail of the impact the development has on the Barrington Tower, which dates back to 1810, however, as a whole it ignores and treats as irrelevant the Glendruid Portal Tomb which is estimated to be around 5000 years old (page 29 table lists the dolmen as N/A despite its immediate proximity to the development). The area of the monument will be severely visually impacted by the tallest of the towers at the back of the site furthest away from Brennanstown Road. This is clearly a very narrow interpretation of the Burra Charter.



As the owner of the land which contains Glendruid Dolmen, I was obligated to follow numerous requirements of my own planning, many of which have been swept aside for Strategic Housing. As I said at the outset I am not against housing in the area but I strongly believe the County Plan must provide guidance for and be respected by all.

As residents, we have relatively minimal resources in comparison to a large multi-national company such as Cairn Homes. Were such resources available to us I believe we could provide equally compulsive evidence of how the development would negatively affect the existing community, the rural nature of the road, the local habitats and biodiversity and the ancient heritage in the area.

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The valley is a haven for a wide variety of wildlife who's habitat has been ever decreasing in recent years. As has been said repeatedly and is clearly stated in the County Plan, "Climate change is the greatest global challenge of our time" (3.1 page 53, Written Statement). Destruction of habitats and biodiversity accelerate climate change and the warnings of the IPCC and other global bodies are ever more stark. However despite the efforts of the County Planners, developments such as is proposed for the Barrington Tower land, ignore these realities. Vast developments for profit and degrading every small pocket of biodiversity and wildlife habitat left is a strategy for self-destruction. In order to really build sustainable and vibrant communities we must change our approach to building and stop developments of this type in areas of this type.

Please change this outcome by recommending a development more in line with the existing communities in the area – both human and non-human.

Supporting materials

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

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

If your supporting materials are physical objects, **you must send** them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Remember: You can insert photographs and similar items in part 5 of this form – Observation details

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic housing observation **only** is €20.
- strategic housing observation **and** oral hearing request is €70

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

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No, I do not wish to request an oral hearing

☐

Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020



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FEM – Received		SHU – Processed	
Initials		Initials	
Date		Date	

Notes