



An
Bord
Pleanála

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

Laurence Hill

(b) Observer's postal address

"Hill House", Brennanstown Road, Dublin D18 N5Y3

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)

An Bord Pleanála reference 313281

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

'Barrington Tower',

- (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 note that Cairn Homes Properties are applying for planning permission from you to erect 8 blocks providing 534 apartments with 419 parking spaces at the above address.

My main grounds for objecting to this scheme are under the following headings:

1/ Scale of project. 2/ Height of blocks

3/ Insufficient residential parking

4/ Inadequacy of road: Serious health & safety issue due to narrowness of road and very limited footpath facility.

1/ Scale of Project:

The original application was for 158 units. This new application is 350% increase in density which will have a huge adverse effect on local amenities, road usage, car parking on main road and traffic.

The scheme proposes a density of 140 units per hectare, on a site that:

1. is located in a suburban area;
2. contains a Protected Structure;
3. adjoins low density two storey dwellings; and is
4. poorly served by public transport at present.

The development materially contravenes the sites objective ***“to provide residential development and improve residential amenity while protecting the existing residential amenities”*** in that the development will not improve residential amenity on the site for future residents and will not protect existing residential amenities of adjoining residents.

The fact that the development cannot be permitted without materially contravening Development Plan policies in respect of parking standards (significant under provision of parking), height (up to ten 10 storey

5. Grounds

apartments next to pre-existing 2 storey detached development), unit mix, separation distances, and a specific local planning objective restricting development along the Brennanstown Road to minor infill, all point to significant over development. Therefore, permission should be refused.

2/ Height of blocks: we understand that 10 storey high blocks would, in the main, be in excess of County Building Height Limit Of 3-6 storeys, and would therefore be a material contravention of the Development Plan.

3/ Insufficient parking: the question arises where will the 115 apartments without a car parking space park their cars? Where will visitors, creche users and retail shopper all park their cars?

Road side parking is out of the question due to narrowness of the road.

4/ Inadequacy of Road

Brennanstown Road, originally a rural road, is not considered suitable to cater for current traffic flows safely, nor the high volumes of traffic that will be generated by the proposed development, as well as the traffic flows from those permitted developments coming online.

Having regard to this existing substandard arrangement, to permit the proposed development would exacerbate an existing undesirable situation and endanger public safety by reason of a traffic hazard and obstruction of road users, cyclists and pedestrians and therefore would not be in accordance with the proper planning and sustainable development of the area.

- The restricted width of Brennanstown Road is not suitable to cater for high volumes of construction traffic that will be generated by the proposed development during the construction phase.

Current permitted construction traffic already causes unregulated stoppages on the road and kerb mounting events.

Having regard to this existing substandard arrangement, where there is currently a 3 Tonne weight restriction and where two HGVs cannot physically pass each other, the proposed development would exacerbate an existing undesirable situation and endanger public safety by reason of a traffic hazard and obstruction of road users, cyclists and pedestrians and therefore would not be in accordance with the proper planning and sustainable development of the area.

- Due to endangerment of public safety as a result of the intensification of vehicular traffic and vulnerable road users on Brennanstown Road with its inadequate, poorly sighted, unregulated junctions and entrances and total

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absence of cycle lanes and traffic calming measures, the development would endanger public safety by reason of traffic hazard of obstruction of road users or otherwise.

- The internal layout of the development is not in compliance with the requirements of Section 5.2.4 of Technical Guidance Document B, with regard to turning facilities for the Fire Service.

It is considered that the proposed development would endanger residents by reason of fire safety and therefore would not be in accordance with proper planning and sustainable development in the area.

- Brennanstown Road lacks a continuous footpath from Foxrock to Cabinteely, key desire lines, and associated facilities such as public lighting, delivery/visitor parking, cycle lanes and safe crossing points. It is not within the gift of the Applicant to deliver these improvements as they require road-widening, grading and re-alignment along the length of the road as part of an coordinated package of road improvement measures. Carrying out such works will require the approval of the Council and either the unlikely consent of multiple Third Parties or compulsory purchase orders. The Applicant is therefore reliant on the uncoordinated, largely unregulated, arbitrary and piecemeal upgrade of Brennanstown Road which is contrary to proper planning principles.

- The Traffic and Transport Assessment included with the application does not reflect the ongoing congestion that affects at the signal-controlled junctions located at either end of Brennanstown Road and the surrounding local road network. It does not appear that consultation took place between the Applicant and the Local Authority to determine how this congestion would be assessed. It is considered that the proposed development would increase congestion and delay on what is in essence a rural road in an urban location, and therefore would not be in accordance with proper planning and sustainable development in the area.

In conclusion:

The Development Plan states that development on Brennanstown Road will be limited to:

'minor domestic infills and extensions until a Traffic Management Scheme for the area has been completed and its recommendations implemented.'

No such scheme has been adopted and implemented and the development would contravene this provision. It would also materially contravene Development Plan policies regulating height, unit mix, and parking.

5. Grounds

The scheme also materially contravenes the site's zoning.

The proposed development, in addition to materially contravening the Plan, also relies on Third Party lands to affect piecemeal works to the Brennanstown Road – piecemeal development is not consistent with the proper planning of the area.

The development is substantially taller and significantly more dense than existing development in the immediate vicinity of the site and would impact negatively on the Brennanstown Road. In short, the proposed development pinches in too many places and clearly represents overdevelopment of the application site.

Some development on this site may be inevitable, but the form of that development must have regard to its context. In this instance sufficient regard to context is not demonstrated and I must ask that the Board refuse planning permission for the currently proposed development.

Laurence Hill.

13/05/2022

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

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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



For Office Use Only

FEM – Received		SHU – Processed	
Initials		Initials	
Date		Date	

Notes