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An Bord Pleanála
64 Marlborough Street
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15th May 2022

**Re: Case reference: TA06D.313281
"Barrington Tower", Brennanstown Road, Dublin 18.**

To whom it may concern,

We submit this observation on Strategic Housing Development ABP Ref 313281 2022, also known as the Brennanstown Road SHD or the Barrington Tower SHD, submitted by Cairn Homes Properties Limited. We ask An Bord Pleanála ('ABP') to refuse permission for the proposed development based on the below grounds, namely safety issues associated with the current state of Brennanstown Road and secondly material contraventions of the County Development Plan 2022-2028. We would like it noted that we believe it would be dangerous for ABP to approve such a development, which will clearly be detrimental to the safety of road users (pedestrians, cyclists and drivers) and residents in the years ahead.

Safety, Road & Traffic Issues Relating To Brennanstown Road

Brennanstown Road is a c.2km "country" road to which only ad hoc and substandard enhancements have been made despite the significant increase in both residential units and traffic volumes. Despite the sub-standard nature and the lack of road enhancements, it will soon be subjected to greater numbers of hazardous traffic movements due to new residential developments that have already been granted permission. These new developments (Brennanstown Wood and Doyle's Nursery) were approved by ABP even though they have not been properly supported by necessary overall road improvements, because the Part 8 strategy proposed to improve Brennanstown Road was rejected in 2017 by the local councillors and no other overall measures have been put in place. Furthermore, conditions which ABP applied to prior developments have proven to be wholly unsatisfactory. *We contend that it would be incorrect and dangerous for ABP to approve further developments particularly one of the sheer size and scale of the proposed Barrington Tower development, before substantive road improvements are carried out.*

1. Road is not able to sustain the transport infrastructure proposed

The developer states "*Vehicular/pedestrian/cyclist access from Brennanstown Road into the development will be provided along with improvement works to the Brennanstown Road including a new junction and pedestrian crossing facilities*". However, the following should be noted in relation to the above;

- (i) These improvements are only on the section of the road directly adjacent to the proposed development *leaving major parts of the road sub-standard for existing road*

users and the estimated 2,000 additional proposed residents of the new development.

(ii) There is no cycle lane on Brennanstown road, nor is there the capacity to put one in at this time due to the narrowness of the road - *even though the developer is promoting cycling as a key transportation link and proposing to insert 1,266 cycle bays.*

(iii) There are segments of the road with no footpath or an extremely narrow footpath (less than 6ft wide) where two people cannot walk side by side. This forces pedestrians to walk out onto the road when meeting oncoming pedestrians and is wholly inadequate for baby buggies and wheelchairs. There is no plan to address these risks (including a narrow stretch towards the Glenamuck Junction) even though the developer *estimates that the development could house 2,000 additional proposed residents.*

(iv) The closest bus that can be accessed at the Glenamuck end (no.63) runs very infrequently (only 2 services an hour) and does not run towards the city centre. There is also no footpath to allow people to walk to Cabinteely to access the bus network, *even though the developer promotes access to the bus network at Cabinteely as one of the transportation links.*

(v) Fire trucks already have difficulty accessing fires on this road due to accumulation of traffic and difficulties turning at the new roundabout at Brennanstown Wood. The fire brigade experienced delays dealing with a fire in August 2021 as the water tankers which they required could not access the site, due to the narrowness of the road and traffic which had built up. *This existing risk will only be amplified by the addition of 530 new apartments in high rise buildings (up to 10 floors) and 400 new cars on the road from this development alone.*

(vi) It is our understanding that the LUAS is already near capacity and there is standing room only at peak times for trains leaving Brides Glen. Capacity issues will only become more acute as the adjoining Cherrywood town centre is completed.

2. The road is dangerous and unable to sustain increased traffic volumes.

(i) *The road is extremely narrow and, in some places, dangerously so (room for one car to pass only).*

In parts of the road there are no paths, and routes are already hazardous as the road is flanked by tall masonry walls, providing no refuge for walkers or cyclists in the event of a developing collision. It is not unusual to find a wing mirror on the side of the road that has been clipped off by another vehicle passing at speed in the opposite direction.

(ii) *Flawed Traffic study.*

We would contend that the traffic study undertaken significantly understates the actual traffic volumes traversing Brennanstown road. The Glenamuck junction study was undertaken on the 21st of July 2021, during Covid, when the government was still advising the population to work from home, and at a time when traffic would have been subdued due to school holidays. Furthermore, no study was undertaken at the Cabinteely junction, with the developers seemingly relying on an old 2019 study. Given general population growth and increased residential density within the local area since 2019, this study would have understated current traffic volumes.

(iii) Increased traffic volumes due to proposed commercial developments.

Traffic volumes have increased sharply in recent years with one of the main reasons the M50 (Junction 15) and Carrickmines retail park, both of which have resulted in Brennanstown Road being used as a “connector” to and from both highly trafficked areas. Further development plans for the extension of Carrickmines retail park in Dublin have been approved. The expansion scheme involves an 84,000 square metre addition to the existing park (include shops, restaurants, retail warehouses, 130 apartments and leisure facilities). Transport agencies have raised concerns about the impact on the M50. This further development will also lead to increased traffic volumes on Brennanstown Road.

(iv) Increased traffic volumes due to approved residential developments

In addition to the extension of Carrickmines retail park, two other developments (both residential) approved by ABP will significantly increase traffic volume on Brennanstown road. The first being the currently under-construction Brennanstown Wood at one end of Brennanstown Road comprising 138 units and the second being Doyle Nurseries at the other end of the Brennanstown Road comprising 234 units. This increase in traffic volume will make an already dangerous road for motorists even more dangerous and entirely unsafe for cyclists and pedestrians, especially those walking with children, persons with disabilities and dogs.

(v) Lack of junctions to alleviate traffic build up.

The road is c 2km long, but it has only two access points (Glenamuck Junction & Cabinteely junction) to deal with traffic volumes. There are no other routes to alleviate traffic build up. Presently at peak times a wait of 20mins can be required to pass through the junctions. This will only increase as the developments come online making it untenable for any further increase in traffic volumes which the proposed Barrington tower development would bring.

(vi) Inadequate proposed traffic measures

The Barrington Tower application refers to the insertion of a new traffic light and pedestrian crossing at the entrance to the development. This signal system will do nothing to alleviate the traffic volumes or tail backs and will only serve to break up the traffic / tail backs introducing them on to parts of the road which are currently spared. This in turn will prevent more residents from safely accessing or exiting their properties while cars are waiting outside them queuing in traffic.

(vii) Insufficient Parking

Proposed number of car park spaces (419) is in contravention to existing policy – and does not supply a parking space for each unit. There is also no visitor parking nor any spaces for the proposed crèche, meaning visitors or residents may seek to park on Brennanstown road – which is clearly not fit for parking purposes due to the narrowness of the road. This clearly highlights that the proposed development is simply too large for the site and is a case of over development.

Material Contraventions of the County Development Plan 2022-2028 and other issues.

(i) The Land Use Zoning is *“Objective A – to provide residential development and improve residential amenity while protecting the existing residential amenities.”*

We submit that the proposed development would materially contravene Land Use Zoning Objective A, its purpose and intent – to protect and improve residential amenity. We ask An Bord to uphold the County Development Plan.

(ii) 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. We submit that if An Bord 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. This includes adult and child pedestrians; able bodied and disabled persons; cyclists, e-bikers and e-scooterists; visitors and delivery personnel; truck drivers, car drivers and construction vehicle drivers; drivers of emergency service vehicles. Safety and amenity would be diminished due to traffic hazards that will arise under several headings due to the congestion, and obstruction of traffic movements arising during the construction and operational phases of the proposed high density residential development.

(iii) 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 obstruction, 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 existing properties leading to a loss in house prices.

(iv) Paragraph 12.3.5.2 “Separation Between Blocks” states *“All proposals for residential development, particularly apartment developments and those over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing effects and provide sustainable residential amenity conditions and open spaces.”*

This is qualified by the following paragraph (our emphasis in **bold**): *“A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. **In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.** In certain instances, **depending on orientation and location in built-up areas,** reduced separation distances may be acceptable. In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.”*

We submit that this development exceeds the prescribed height of three stories whereby 22M separation distance is considered acceptable by two to seven stories.

We submit that this low-density area of single-story and two storey houses cannot be one of the “built-up areas”. We therefore submit that the proposed development would materially contravene this requirement of the Development Plan, which is intended to ensure that the primary land use zoning objective is met. The daylight report shows that these blocks, due to the limited distance between them, their excessive length and height will cause overshadowing of the Communal Open Space, resulting in a poor-quality external environment. We submit the COS will suffer from tunnel-effect high winds from the prevailing wind direction and significant downdrafts due to the height of the buildings.

(v) The second paragraph of Section 12.3.3 ‘Quantitative Standards for All Residential Development’ of Chapter 12 (pg. 236) of the Written Statement, states: *“That the requirement for certain percentages of 3-bed units in apartments shall apply to Build To Rent developments to accord with mix on page 237.”*

We submit that the proposed development would materially contravene this requirement of the Development Plan, which is intended to ensure that an appropriate mix of apartment types are available to the rental market, would therefore fail to support the growth of a sustainable local community and fail to improve residential amenity.

(vi) The preservation of the trees to the north of the subject site is an objective of the development plan as shown on Land Use Zoning Map 7. This can be downloaded as [land_use_zoning_map_7_0.pdf](#) from the Council website.

We submit that the proposed development would materially contravene this requirement of the Development Plan, as the removal of these trees is required for the development of Blocks AB and CD. The removal of these trees would seriously injure the amenity of both the neighbouring houses and the visual amenity of Brennanstown Road and would therefore be contrary to the proper planning and sustainable development of the area.

Proximity to a Natural Heritage Area

On page 10 of the Developer’s application form where it asks “Is the proposed development, in whole or in part, within or close to a European site or Natural Heritage Area?”, the developer has ticked “No”. While we do not know the formal definition of a “Natural Heritage Area” as it relates to an An Bord Pleanála Application Form, we could be forgiven for thinking the 3,500 BC Glendruid Dolmen and surrounding area would have constituted as one. This ancient Neolithic tomb is a protected national monument and is c.200 meters from the proposed development site. The Dolmen is also beside a private cemetery and ancient woodland. The proximity and density of Barrington Towers will have a significant impact on the unique character of the area and the integrity of our heritage.

In conclusion we ask ABP to refuse permission on the grounds that it will *exacerbate existing risk and safety issues associated with Brennanstown Road* and because the proposal is in *material contravention of the County Development Plan 2022-2028*, in addition to other issues.

Finally, as part of our observation, we would like to request an oral hearing.

Yours faithfully
Marie and Patrick Drury Byrne