

Andrew Mulvany
29 Hazelbrook,
Kinsealy Lane.
Malahide.
Co. Dublin K36 KD32

An Bord Pleanála
64 Marlborough Street
Rotunda
Dublin 1
D01 V902

Date: 23rd May 2022

Broomfield SHD

Lands at Back Road and Kinsealy Lane, Kinsale, Broomfield, Malahide, Co. Dublin

ABP ref # 313361.

To whom it may concern,

I wish to submit this observation to you in relation to the above SHD development in our area. I am providing this submission to you on behalf of myself, my wife and our 2 children, aged 5 and 3.

While we are generally supportive of the provision of housing in our community, we wish it to be noted that this should be undertaken in a proper and sustainable manner, in line with planning, development and infrastructural best practice. We wish to state that we do not object to the provision of residential development at the above SHD address, but we, as a family, and as existing residents of Hazelbrook, have a number of concerns in relation to the proposed development which will affect us directly.

We wish to use this Observation Submission to outline and bring to your attention those concerns so that they may be considered by your office when determining the outcome of the application for this SHD.

The basis of my concerns in relation to this proposed development centres on 4 main points:

1. Health and Safety

Our main concern is the provision of a link road from Kinsealy Lane, right through Hazelbrook, where we reside, into the Southern Site of the SHD. On the current plans, this proposed access through road will then be linked up directly to the northern site of the overall SHD, thereby creating a through road from Kinsealy Lane, via Hazelbrook onto the Backroad.

This will inevitably mean a significant increase in vehicular traffic passing my house. As parents of 2 small children, this is a major safety concern of mine. Currently, my children enjoy the freedom of playing both on the road and on the adjacent green with their friends. This green area is a focal point

for children from Hazelbrook but also from the neighbouring estates of Castleway and Sleepy Hollow. This green area is the only flat playing surface within these developments that does not have flood relief measures in place. Therefore, it is a popular recreational amenity for all age groups. The proposed development of the Hazelbrook Road to be a through road link into the SHD, will mean that safety of children using the green area that directly borders the proposed through road will be compromised and the effectiveness of the amenity will be eroded. Hence my children's independence will be restricted by the very close proximity of the road and through traffic nature.

In section 8.6 of Broomfield LAP, it is stated that – *Class 2 Public Open Space should be "safe, secure and well designed, enjoying passive surveillance from surrounding dwellings. These areas shall be provided at several different locations throughout the site so as to provide each residential area with sufficient public open space at locations that are convenient to them. These spaces must be of a scale and configuration so as to perform a function as an attractive green space, provide a green lung and act as a usable area of children's play space and "kickabout space" for young children".*

This proposal to run a through road alongside an existing Class 2 Public Open Space, in my opinion, shows a disregard for the provisions of the LAP and for the existing residential amenity and contrary to both the Broomfield LAP and Fingal Council "Keeping it Green – Open Space Strategy"

Coupled with that will be a degradation of air quality in the area as a result of a significant increase in transit and incoming traffic using the proposed link road. As the density of the proposed SHD development is quite high, this could mean a potential of thousands of cars passing emitting pollution into the environment. This contravenes the FCC school streets initiative for the Malahide area. This pioneering initiative to exclude cars from in or around schools to support Health and Safety will in fact be encouraging traffic to channel into an area where children spend their non-school time. This will subject the designated green areas that border the proposed road to real impact from traffic.

Typically, cars are parked on the Hazelbrook Road, which will hinder traffic flow and affect sight lines, which is a risk to safety in my opinion. The fact that kids are very active in the area could lead to a potential safety risk in relation to kids running out from behind parked cars.

2. Infrastructure

We believe that there is inadequate and sub-standard physical infrastructure in place currently and the SHD proposal does little to rectify or remedy the situation. The current road into the southern part of Hazelbrook has a number of sharp bends and blind spots. This road is currently classified as agricultural/emergency access right of way to adjoining lands and is not adequate to facilitate through traffic flow. Large agricultural machinery traverses this route multiple times during each day. If there are any vehicles parked on the road, machinery has to mount the kerb and green area to get by.

It should be further noted, original plans indicated that access would be provided into the Southern Site development via the Back Road entrance. This was changed by the tripartite meeting in April 2021 to then provide access and a through road via Hazelbrook onto Kinsealy Lane, without any local consultation or involvement from the Hazelbrook Residents Association. This is in my view, a total disregard for the conditions set out in the Broomfield LAP. The Broomfield LAP further states, under Section 7.6 'Internal Movements' that *"The LAP lands will primarily be linked with the wider road network from Back Road. Secondary accesses from Kinsealy Lane to the LAP lands will be restricted to*

emergency vehicles only, cyclist and pedestrians - the exceptions to this are a vehicular access into the Consolidation Area and agricultural vehicle access to lands east of the LAP lands".

It should be noted that there is a precedent in the Malahide area for single road in/out of developments; refer to Robs Wall and Seamount and therefore the Back Road single entrance should be more than able to accommodate the expected traffic flows in and out of the SHD without the need for a through road via Hazelbrook onto Kinsealy Lane.

The proposed opening up of Hazelbrook as a through road into the Southern Site of the new development will encourage more transit traffic on Kinsealy Lane, when it is obvious that the current surrounding infrastructure is struggling to cope. Kinsealy Lane is not fit for purpose; there is an absence of footpaths over a considerable length of the road, the road narrows at various points and large vehicles sometimes struggle to get down it if meeting oncoming traffic.

My children walk to their Montessori and most of that journey has to be done on the road as no footpaths exist and traffic volumes and speeds are considerable. This proposal will only encourage more of the same as vehicles will use the proposed road via Hazelbrook as a 'rat run' to get to the Back Road from Kinsealy Lane. If the Hazelbrook entrance to the Southern site is not permitted, traffic would naturally flow down the Malahide Road onto the Back Road, rather than via Kinsealy Lane.

The Traffic and Transport assessment flow of Kinsealy Lane was conducted during the Covid pandemic when home and remote working was mandated. This resulted in less traffic on which to base a normal traffic flow assessment. It should be noted that agriculture vehicle movements were also not factored into the assessment. Therefore, this assessment is flawed.

It should be further noted that the line of site for traffic exiting the current Hazelbrook development is compromised by a wall when looking right. This is a danger to exiting traffic but also traffic traveling south on Kinsealy Lane.

3. Transport

We feel that the area does not have good connectivity unless travelling by car. There is a lack of access to public transport and facilities for cyclists and pedestrians currently. It is at least a 30-minute walk to access public transport from Hazelbrook and the proposed Southern Site. There is no footpath access whatsoever on Kinsealy Lane from Hazelbrook to Chapel Road. Hence, people have to drive to access adequate public transport which again leads to unnecessary car journeys in the area. The current state of Kinsealy Lane is a danger to both pedestrians and cyclists so as parents, we have serious safety concerns for anyone not in a car on the road.

4. Schools access

The School Demand Assessment Report implies that there is sufficient school capacity for the school going population. This is in fact incorrect. It should be noted that the current Hazelbrook development and by extension, the proposed Southern Site are considered outside the school catchment area for all Malahide primary schools with the exception of St. Andrews primary school and for the Malahide & Portmarnock Educate Together. Applications to these schools are oversubscribed and this will be further compounded with the addition of this proposed SHD and other SHDs in the general Malahide area. The recent decision of FCC to refuse planning permission

for a new primary school in the area, citing lack of connectivity will exasperate the issue and highlights that FCC also consider this an issue for the area containing the proposed SHD.

Furthermore, Hazelbrook is in the catchment area for Malahide Community School but several of my neighbours have been advised that their children are on a 70-pupil waitlist at a minimum. Portmarnock Community school is not within the catchment area of Malahide. This report is therefore flawed.

Summary

In summary, we are concerned by the likely traffic impact of the proposed through road via Hazelbrook into the SHD. This will affect the Health and Safety of my children as well as their independence to access amenities within Hazelbrook if the proposed road access is granted.

When we purchased our house in 2017, it was explicitly stated that the road adjacent to our house would be used for an agricultural right of way and would not be used as a planned right of way into any future developments. This gave us the reassurance that we could bring up our children in a safe and secure environment free from excess traffic. Over the last number of years, our children have enjoyed the green space amenity and freedom to cycle their bicycles and play games, both on the green area and on the road. This has created a lovely community for them to play with their friends in a secure outdoor environment after school and on weekends, in all seasons. If the decision is granted to open up this road to through traffic into the SHD, our children will no longer be able to race on their bicycles on the road or play safely on the green area due to the proximity of the road to the green amenity area.

While it has been stated that through traffic will be subjected to ramps and raised tables, experience of driving in Ireland shows that motorists will take 'rat run' routes so long as they are moving. This will lead to increased traffic seeking to avoid congestion at the Back Road/Kinsealy Lane junction and taking the through route via Hazelbrook.

One suggestion to potentially alleviate infrastructure and accessibility issues would be the provision of a future proofed alternative route to address a number of contentious issues in the general area. For example, the provision of a link road development from the Malahide Road/Feltrim Road junction eastwards towards Blackwood Lane in Portmarnock that would traverse the southern edge of these developments, built to standards with future pedestrian, cycling and public transport demands in mind. This could lead to the reduction in traffic and pinch points on both ends of the Back Road, both ends of Kinsealy Lane, and both ends of Chapel Road. Also, further afield, traffic on the Portmarnock to Swords axis could be diverted onto this new route from transiting through Malahide village.

I trust you will take my points into consideration when you are coming to a decision on the proposed SHD development, and I thank you in advance for your time in reviewing my submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andrew Mulvany', is written over a horizontal line.

Andrew Mulvany