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Observation

to

**Proposed SHD on Lands at Back Road & Kinsealy Lane,
Kinsaley, Broomfield, Malahide, Co. Dublin**

ABP. Ref. 313361

May 2022

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1. Introduction

As residents of No 26 Hazelbrook, we are particularly impacted by the proposed development and increased traffic and associated risks that the proposal creates to our safe access to our home for our children, neighbours and ourselves (fig 1).

The scale of the proposed development also creates and exacerbates existing challenges regarding school access and traffic management in the areas located in the vicinity of Back Road and Kinsealy Lane in Malahide.

We do not object to residential housing in the locations, but are concerned about the scale, density and traffic access past our home.

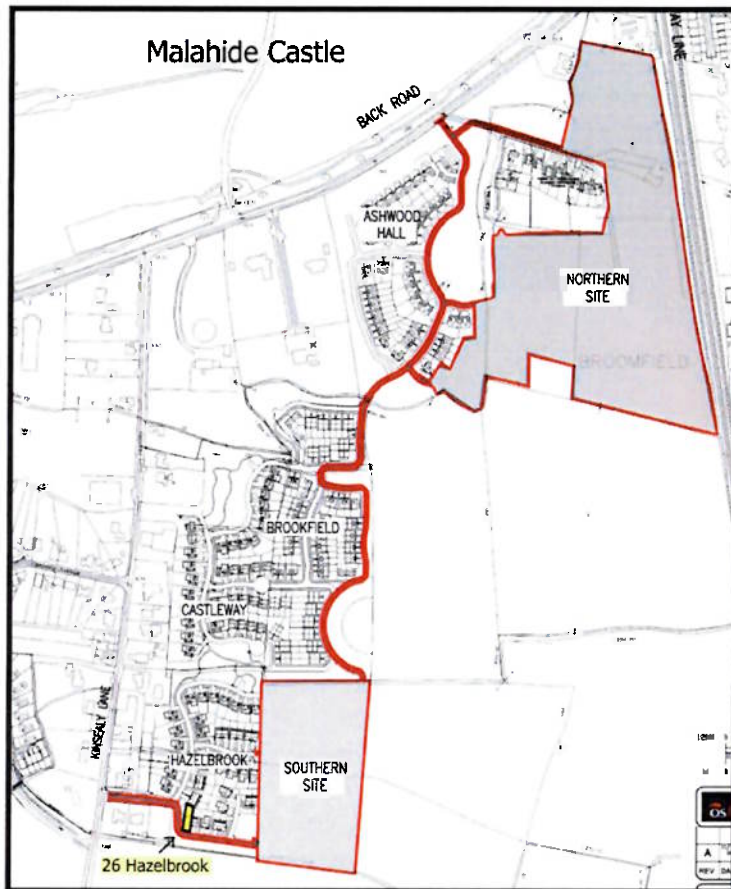


Fig 1. No 26 Hazelbrook in relation to the proposed development.

2. Social & Physical Infrastructure

Schools availability: Many residents in the neighbouring developments have experienced difficulty when obtaining school places for both primary and secondary school children. We are concerned that a development of this scale will exacerbate these issues for our own children seeking school places. We also note the recent refusal by Fingal County Council for planning permission for a new 16 classroom primary school development on land immediately adjoining the proposed development site, thereby further intensifying this issue.

Concentration: As noted on the proposal, the Fingal Development Plan “estimates that 1,114 residential units can be produced within Malahide”. When the 415 proposed residential units are combined with the Lamorlaye, Back Road application (providing for 102 no. dwellings) this results in 519 additional units in close proximity and both on the Back Road, this represents a heightened concentration of c47% of the estimated total Malahide capacity in one small area of the broader Malahide geography.

Public Transport: The planning statement states that “Malahide train station offering DART services to Dublin City Centre is a 20-minute walk or a 6-minute cycle from the site”, which does not appear to reflect journey times from the southern elements of the development. The walk to Malahide Dart station is 30-35 minutes from our address in Hazelbrook. As such, we will drive to Portmarnock train station to park and then get the Dart from Portmarnock (which has better parking facilities than Malahide).

3. Design

Density: We do not object to residential housing at the proposed locations; however the density is significantly greater than the established neighbouring estates. In particular, the southern location has doubled the housing density when compared to the previous proposals from the 2013 plans (fig 2).



Fig 2. Hazelbrook and Proposed Southern Site – November 2013 versus current proposal

4. Traffic Impact

There are a number of notable traffic pinch points in the immediate areas surrounding the proposed development, specifically,

- Back Road: Significant traffic backlogs experienced to the east with traffic often backed up close to the railway line due to challenges turning right into the Hill from Back Road. Traffic issues also occur to the west as traffic joins the Malahide Road. These traffic flow issues are also further heightened due to public traffic accessing Malahide Castle at weekends and also for events.
- Chapel Road: Traffic frequently backs up from the Malahide road junction at St Olaves beyond the Kinsealy Lane junction, making it very difficult for traffic on Kinsealy Lane to get onto Chapel Road.

The Hazelbrook proposed southern access route accesses Kinsealy Lane at a junction (fig 3) with poor visibility when turning right out of Hazelbrook (fig 4) adjacent to a working farm and which is also in use by agricultural vehicles and HGVs (fig 5). This presents a challenge to current residents of Hazelbrook, but would be considerably worse with increased traffic volumes using the same entrance.

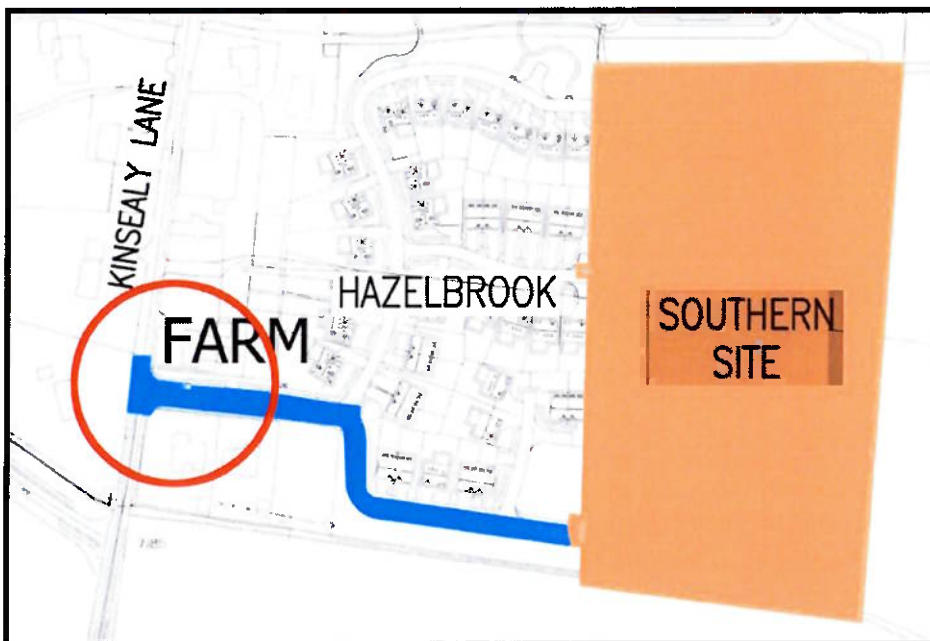


Fig 3. Access via Hazelbrook junction onto Kinsealy Lane.



Fig 4. Hazelbrook exit to Kinsealy Lane.



Fig 5. Farm at Kinsealy Lane exit.

The proposed route through Hazelbrook is contrary to the original design principles for that section of road as per the previous plans (fig 6), where the southernmost west-east section was never intended for use for through traffic. This section of road was originally designed for local access to the small number of houses in that section of the Hazelbrook development and only for cyclists, agriculture and emergency access to the southern section of the proposed development. Vehicular access to the proposed development was to be via Back Road.

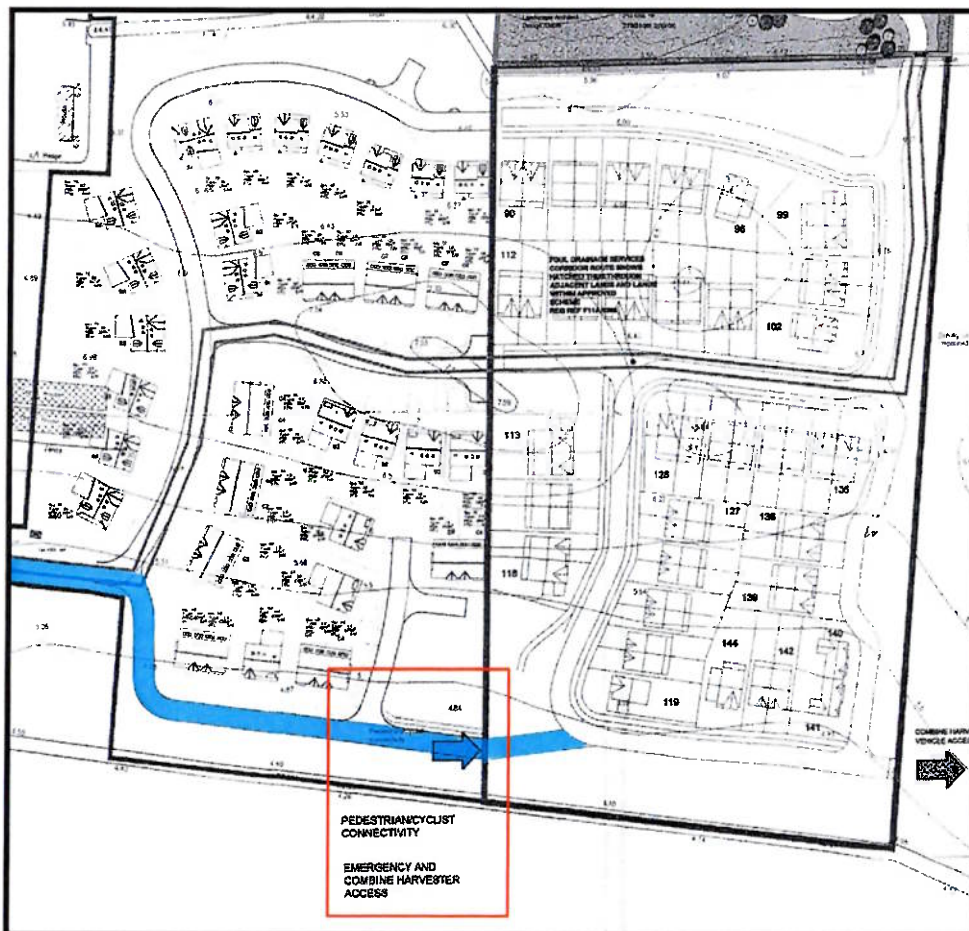


Fig 6. 2013 plans for Hazelbrook with the link road to the proposed southern site restricted to pedestrian, cyclist, emergency use and agricultural access.

5. Safety Concerns

The proposed route past no 26 Hazelbrook (fig 7) raises immediate safety concerns given the relatively low radii curves at no 25 (fig 8) and no 26 (fig 9) will require quite abrupt changes in directions for drivers negotiating this section of road. This could result in opposing vehicles striking each other. In addition, the driveway for no 26 Hazelbrook (fig 9) is very close to the apex of the curve with limited space to observe traffic as cars reverse out of the driveway. This is a concern at the moment for us, but the risks of a traffic accident would significantly increase with the proposed increase in traffic volumes negotiating this route. In addition, the junction at No 25 tends to favour traffic turning north after entering the estate leading to increased risks of collisions for increased traffic volumes coming from the south.

We note that there exists a green play area in Hazelbrook bordering the southern development site (fig 7), which is commonly used by children as per the original design. The proposal to significantly increase traffic adjacent to this amenity presents an immediate danger to children enjoying this space. Any increase in traffic at this location presents an unacceptable level of risk to local children.

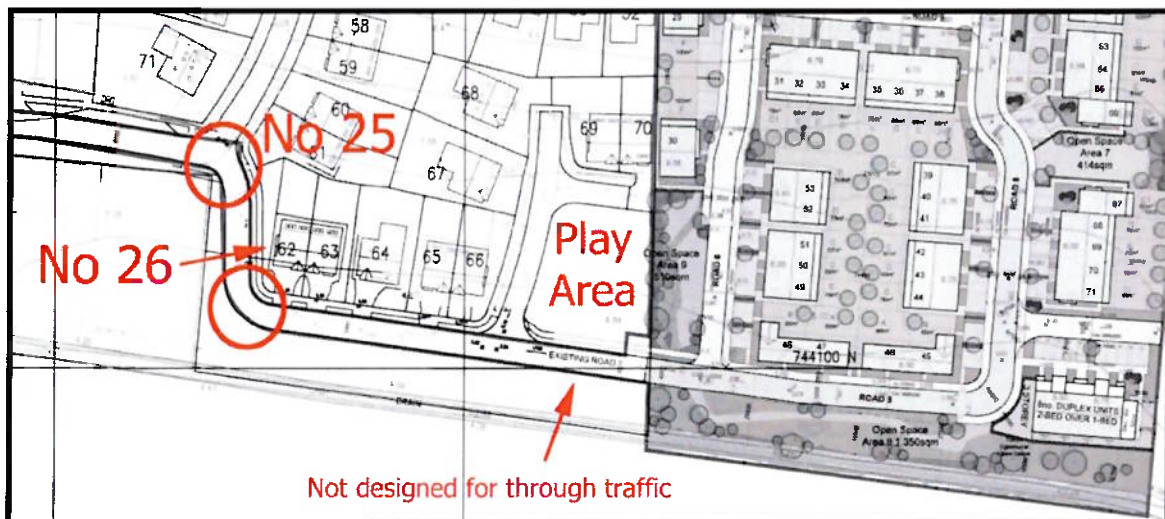


Fig 7. Proposed southern access route through Hazelbrook.



Fig 8. Small radius turn at no 25 Hazelbrook

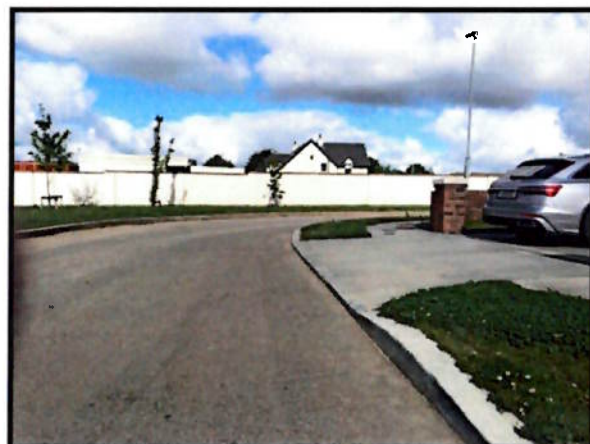


Fig 9. Small radius turn at no 26 Hazelbrook

6. Environmental

The southern border of the proposed development is adjacent to a river which borders agricultural lands, which are known to flood in winter between the adjacent river and the river just south of the Castleway pumping station. This area is frequented by wetland and coastal bird life e.g. grey heron, little egret, ducks, etc. Large scale development may have a negative impact on birdlife and also on the capacity of the agricultural land to act as a flood plain during periods of wet weather.

7. Nuisance

As residents located close to the proposed Southern development site, we are concerned about disturbance during the construction phase, noting the following:

- **Dust and noise:** The prevailing winds come from the south east with current issues resulting from dust due to agricultural activities in adjoined lands to the south. We are concerned that additional construction related dust and noise could add to this current issue.
- **Service interruptions:** Recent developments (e.g. Oak Park on Kinsealy Lane) have impacted on water supply and also builders have damaged Eir broadband infrastructure resulting in lack of service access for a number of days. This had a significant negative impact on our ability to work remotely.
- **Construction Traffic:** As noted earlier, Back Road and Kinsealy Lane suffer from capacity and maintenance issues, which will deteriorate further with 3 years of construction traffic due to the proposed development and also the Lamorlaye, Back Road application (providing for 102 no. Dwellings) and current residential developments on Kinsealy Lane (e.g. Oak Park and current construction at the southern end of Kinsealy Lane). We are also concerned that the developers may not restrict themselves from using the proposed southern access route for construction vehicles.