

ABP. Ref. 313361

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

Submitted by: Aoife Gibbons, 29 Hazelbrook, Kinsealy Lane, Malahide, Co. Dublin. K36 KD32 on behalf of Hazelbrook Residents Association

23 May 2022

Dear Sirs,

As a resident of Hazelbrook Estate I wish to submit an observation to the Board in relation to the proposed Broomfield SHD, which is of significant concern to me and to the residents of Hazelbrook in general. I am a member of the Hazelbrook Residents Association (HRA) and my views also reflect those of the HRA.

While I have no objection to the further development of the proposed adjacent residential estate I have serious concerns and reservations about the form of the development and the deficit in the current and future availability of the necessary social and physical infrastructure required to serve the new site and indeed the existing Hazelbrook estate.

The proposed new road access to the Broomfield SHD and particularly the "South Quarter" part of the site development is wholly inadequate, unsuitable and does not serve Hazelbrook residents well. In fact, it will lead to a diminution in our amenities and place the current substandard infrastructure under further pressure.

My concerns can be outlined as follows:

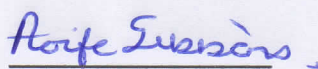
1. Design and Capacity of Hazelbrook entrance/egress to cater for the volume of traffic proposed from the new development and including existing developments within the LAP.
 - a. The current proposed link road will lead to additional traffic which will filter through the LAP from the Back Road to access Kinsealy Lane and in reverse.
 - b. The South Quarter has 89 units with an average 2 cars per household plus a.80 units in the Brookfield phase added to the existing 44 units in Hazelbrook will add to a significant volume of traffic entering and exiting the Hazelbrook estate.
 - c. I believe the Hazelbrook link road from the entrance to the South Quarter to Kinsealy Lane is not of sufficient design to cater for anticipated volumes (and indeed the construction traffic prior). This road was originally designed and granted permission to solely cater for Hazelbrook resident's traffic and farmer access to adjacent agricultural land.
 - d. [The width and depth of driveways in nos.26 to 29 Hazelbrook often necessitate the need for on street parking. With no alternative parking bays this will lead to a further disruption of traffic flows and increased traffic hazard.]
 - e. The already constructed road at Brookfield/Castleway should be permanently opened to spread the traffic volumes over more than one entrance to Kinsealy Lane.
2. Loss of Hazelbrook amenity as the green area adjacent to proposed link road will become unsafe for its original intended use under the LAP.
 - a. Having the link road in such close proximity to the recreational green facing nos.30-35 Hazelbrook will have a detrimental effect on its usage by children.

- b. It will remove the ability for passive supervision of the green as envisaged by Fingal CC guidelines. I and my fellow residents who use this green daily are, in the main, parents of young children and we have a reasonably based worry for the potential for accidents and dangerous incidents should the link road become a throughway for the Broomfield SHD development.
 - c. Proposed traffic calming measures do not mitigate the potential traffic volumes.
- 3. Lack of adequate surrounding infrastructure for a development of this scale.
 - a. There are no adequate footpaths/cycle ways currently on Kinsealy Lane, Back Road, or Dublin Road. There are no footpaths from Hazelbrook entrance to Chapel Lane.
 - b. Despite planning statements for close to 12 years there have been no improvements/upgrades delivered upon to date to key junctions from a passenger vehicle perspective i.e. traffic lights, right turn lanes etc.
 - c. Access to any public transport access is a minimum of 25 minutes walk from the Hazelbrook estate and will be same for the Broomfield SHD South Quarter.
 - d. This suggests that this phase of the development is premature until such improvements are undertaken. The existing substandard infrastructure has now reached beyond the limit of what it can cope with.
 - e. I say that the Traffic Study undertaken is fundamentally flawed as it does not reflect the true traffic volumes on Kinsealy Lane - as it was undertaken during pandemic lockdown periods. From personal experience of residing in Hazelbrook for four years it has been obvious to me that traffic volumes on Kinsealy Lane have increased dramatically over that period.
 - f. I say the study and report about the adequacy of school places is also flawed in both it's methodology and conclusions. The study includes primary schools which are not in the catchment area of Hazelbrook and also incorporates schools in Portmarnock and Kinsealy but without factoring in the competing population sizes in those areas.
 - g. As a parent of school and pre-school children I can attest to the difficulty of finding school places and my experience is shared by many residents in the Hazelbrook, Castleway and Sleepy Hollow estates. The author of the report would be better served to move away from it's desk top exercise to a fact based survey both with the schools themselves as well as local residents.
 - h. The schooling shortage issues at secondary level also apply.

I (and my colleagues in the Hazelbrook Residents Association) have serious concerns regarding the form and scale of the proposed development in the absence of adequate social and physical infrastructure. I believe that the proposed development does not satisfy the CDP zoning requirement for "*the necessary social and physical infrastructure*" to be in place.

The proposed development will be heavily car dependant, as we are in Hazelbrook. I believe the diversion of extra traffic volumes arising from this new development through an inadequate Hazelbrook road network is flawed and requires a rethink on a more suitable and long term direct traffic access onto Kinsealy Lane/Back Road – in tandem with an infrastructure upgrade to these tertiary/secondary roads.

Yours faithfully,


Aoife Gibbons