

Ronnie McPartland

Observation

to

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

ABP. Ref. 313361

May 2022

Prepared By:

Gravis Planning
Denshaw House,
121 Baggot Street,
Dublin 2,
Ireland

T: 01 6599445

www.gravisplanning.com



Contents

1.0	Introduction	3
2.0	Density	4
3.0	Traffic Movement	5
4.0	Summary	7

1.0 Introduction

- 1.1 We, Gravis Planning, act on behalf of Mr. Ronnie McPartland who resides at no. 30 Hazelbrook, Kinsealy Lane, Malahide, Co. Dublin, to the west of 'Character Area 4' of the proposed development¹.
- 1.2 We are instructed to submit an observation to the Board in relation to the proposed Broomfield SHD, which is of significant concern to our client and to the residents of Hazelbrook in general.

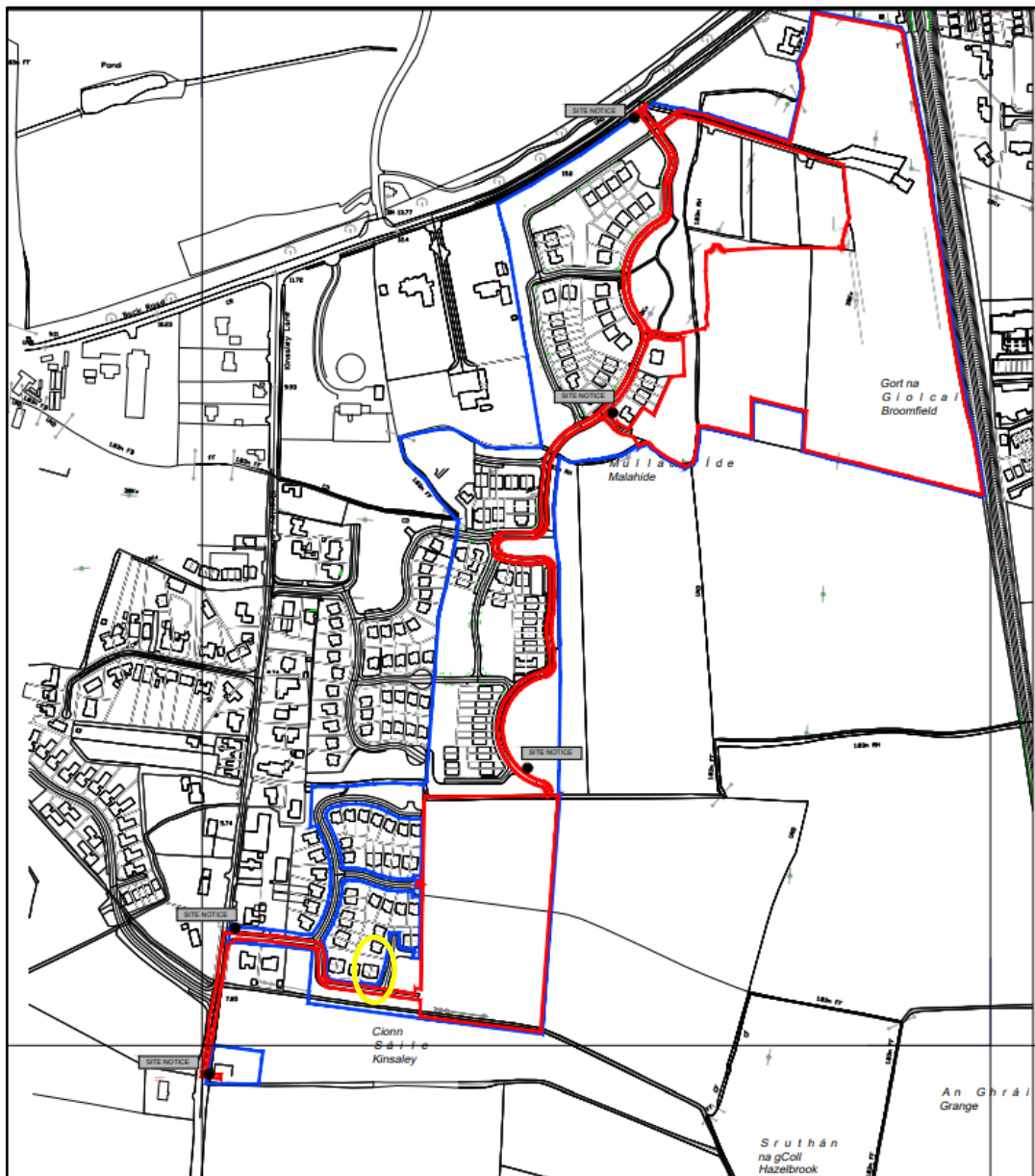


Fig. 1 Location of Broomfield SHD highlighted in Red (Location of our client's property is outlined in yellow)

¹ Our client's dwelling is outlined in yellow on Fig. 1

- 1.3 While our client acknowledges the RA ('Residential Area') zoning that applies to the site and does not object to the principal of residential development here, he has serious concerns about the form and scale of development being proposed given shortcomings in the level of social and physical infrastructure available and/or proposed to serve the site.
- 1.4 These concerns are especially pronounced when it comes to the traffic impact that will be generated by the proposed development which, given its lack of connectivity to public transport and local services, will clearly be heavily car dependant (As reflected in the provision of 721 car parking spaces). Our client has serious concerns regarding the proposed access points to the proposed development area, including one via the existing Hazelbrook estate access road (which adjoins our client's property), the impact of increased traffic flows on residential amenity and on the capacity of the local road network to cater for the increased traffic that will arise from the proposed development.
- 1.5 Our client notes that Fingal County Council has recently refused planning permission for a new 16 classroom primary school development on land immediately adjoining the proposed development site, stating that they were "*not satisfied that the proposed development would enjoy adequate connectivity and would not give rise to unsustainable transportation patterns being overly reliant on the private car*"². The same conclusion should, in our view, apply to the proposed Broomfield SHD. In this regard, the Board should note that the zoning objective for the site is to provide for the development of residential communities "*subject to the provision of the necessary social and physical infrastructure*". We do not consider that an adequate level of social and physical infrastructure is in place to serve development of the scale that is being proposed in this case.

2.0 Scale of Development

- 2.1 The scale of development being proposed is significantly in excess of that envisaged under the Broomfield LAP, which was adopted in 2010 and proposed c. 380 residential units for the *overall* LAP area, equating to a density of 20 units per ha. A major objective of this LAP was to secure the protection of the residential amenity of *existing* dwellings in the area. This objective appears to have been disregarded.
- 2.2 The proposed development of 415 residential units results in a density of 37.4 units per hectare. This is in line with density guidance provided for 'outer suburban/greenfield' locations within cities and larger towns in the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (2009). The applicant's submitted planning report states that '*It is considered that the site is classified as an outer suburban/greenfield site noting its location within the development boundary of Malahide Town and its setting along the periphery of the existing urban area which will form a natural extension to the suburbs of the town within a highly accessible location on appropriately zoned land*'.

² Pl. Reg. Ref. F22A/0105

- 2.3 The description of the site as ‘outer suburban/greenfield’ is not disputed, however it should also be noted that the Guidelines advise that the *‘the development of such lands will require the provision of new infrastructure, roads, sewers and ancillary, social and commercial facilities, schools, shops, employment and community services’*. This is reflected in the CDP zoning objective, which is to provide for the development of residential communities “subject to the provision of the necessary social and physical infrastructure”. Notwithstanding the ‘Community & Social Infrastructure Audit’ undertaken by the applicant, we do not consider the development area to enjoy the “*necessary social and physical infrastructure*” to cater for a residential scheme of this scale, and the proposals themselves do not remedy this situation. They are not, as such, in accordance with the zoning objective for the site. It should be noted that the Broomfield LAP envisaged that “*The northern area of the LAP will contain neighbourhood facility and bus terminus, both of which will be prioritised as part of the phasing process*”³. 12 years have passed since the introduction of the Broomfield LAP, more than 50% of the housing envisaged by the Plan has been completed, and none of this infrastructure has been delivered. The proposed development will not change this.
- 2.4 With regard to social and community infrastructure local residents have noted, in particular, that there is a lack of access available to surrounding schools for additional households, a situation that has been exacerbated by Fingal County Council’s recent refusal for a new primary school in this area⁴. The Community & Social Infrastructure Audit completed by the applicant refers to one Primary School (St. Oliver Plunkett’s) within a 1km radius of the site. Residents of Hazelbrook have been informed by this school that they are not within the catchment area for it. Two other schools in a 2km radius have also advised that Hazelbrook is not within the school’s catchment area. To suggest that sufficient capacity exists in the local area is, based on local experience, without foundation. The same document refers to the capacity of secondary schools. Although Hazelbrook is within the catchment area of Malahide Community School, several residents of Hazelbrook have been advised their children are on a waitlist at a minimum of 70th place and above. Portmarnock Community school is not within the catchment area of Malahide.

3.0 Traffic Impact

- 3.1 Contrary to statements made within the application material regarding the site’s ‘excellent accessibility’ and ‘close proximity’ to high frequency public transport, we consider the site to be relatively isolated from public transport. Malahide DART station, for example, is between a 1.5 – 2 km walk away (25 – 35 mins walk) depending on what part of the development site one starts from. The nearest bus stop, on Malahide Road (Stop 3579), is also c. 20 – 25 minutes’ walk away. These distances and walk times do not equate to ‘accessible’ or

³ Broomfield LAP, Section 5.2.1

⁴ Pl. Reg. Ref. F22A/0105

‘intermediate’ urban locations⁵. The site is, in reality, in a ‘peripheral’ or ‘less accessible’ location for public transport, and the proposed development will be heavily car-dependant.

3.2 In this context our client, and the residents of Hazelbrook more generally, are concerned by the likely traffic impact of the proposed development, in terms of their own residential amenity, the potential for congestion on the local road network and also public safety in light of the poor standard of existing pedestrian and cyclist infrastructure serving the area.

3.3 Our client has raised a number of points of concern regarding the traffic impact of the proposal:

- The local road network is not sufficient to cater for this level of growth. The Broomfield LAP, in 2010, stated that *“Road network improvements envisaged by Fingal County Council include proposed traffic signals at the three junctions on Back Road, namely Dublin Road/Back Road, Back Road/Kinsealy Lane and The Hill/Back Road. The provision of right turn lanes will further improve the capacity of these junctions”*. Twelve years have passed since the introduction of the LAP, more than 50% of the housing of the original plan have been completed, and none of these junction upgrades have been delivered. The LAP also noted that *“In terms of pedestrian facilities continuous footpaths are required on both sides of the road along Kinsealy Lane and Back Road. In addition, pedestrian/cyclist routes through the LAP lands to the school on The Hill as well as the pedestrian/cyclist routes through the Demesne to the Dart Station at Malahide to supplement the proposed east west link are contained in the Fingal Development Plan”*. There are no cyclist routes on Kinsealy Lane or the Back Road, other than those contained within the grounds of the Demesne. Infrastructural delivery in the local area has not kept pace with the residential development that has already taken place, with the result that the area is ill-equipped to accommodate the level of further growth that is now proposed.
- The Traffic and Transport Assessment of Kinsealy Lane was conducted during the Covid-19 pandemic when home and remote working was mandated. This resulted in less traffic being recorded on which to base normal traffic flow assessment.
- The opening up of Hazelbrook as a through road into the Southern Site of the new development will encourage more transit traffic on Kinsealy Lane, and the current surrounding infrastructure is struggling to cope. This proposition would appear to contravene the original Broomfield LAP which clearly states, on Map 4, that access from Kinsealy Lane via southern lands at Castleway and Hazelbrook would be restricted access – *“The southern area LAP lands will be primarily accessed from back road through the northern area lands. Provision shall be made for good connectivity throughout the development area for pedestrians and cyclists, so that one could travel easily from Kinsealy Lane to Back Road on foot or by bicycle. A managed*

⁵ As referred to within the ‘Design Standards for New Apartments’ Guidelines

vehicular connection (i.e. incorporating significant traffic calming features within the design) will also link the northern and southern LAP lands. Direct access from Kinsealy Lane to the southern LAP lands will be restricted to cyclists, pedestrians, emergency vehicles and farm vehicles where the latter require direct access through the LAP lands to the agricultural lands to the east”⁶.

- 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, and 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”.*
- Concern has been raised about safety of children as the Hazelbrook route has a number of young children who play in the area and on the green that borders the road. Providing a through route access point via Hazelbrook will mean an end to this amenity due to safety concerns. 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”.* Proposing a through road to run alongside existing Class 2 Public Open Space, in our client’s opinion, shows a disregard for the provisions of the LAP and for existing residential amenity.
- There is no footpath access whatsoever on Kinsealy Lane from Hazelbrook to Chapel Road. The current state of Kinsealy Lane is a danger to pedestrians and cyclists, which will be exacerbated by the proposed development

4.0 Summary

- 4.1 In summary, while our client does not object to the principal of residential-led development at this location, he has serious concerns regarding the form and scale of the proposed development in the absence of adequate social and physical infrastructure. We agree with these concerns and consider 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 and we share the concerns expressed by Fingal

⁶ Broomfield LAP, Section 5.2.2

County Council that new development in this area would not *“enjoy adequate connectivity”* and would *“give rise to unsustainable transportation patterns being overly reliant on the private car”*.