

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: SHD Application ABP 302580-18, Glencairn House, Murphystown Way, Leopardstown, Dublin 18

October 12th, 2018

Dear Sir/Madam,

On behalf of the residents of the Gallops estate, Leopardstown, Dublin 18, we are objecting in the strongest possible terms to the application for planning by Castdale Limited to develop the site at Glencairn House, Murphystown Way on the following grounds:

1. The Traffic and Transport Assessment conducted by DBFL Consulting Engineers, which is a key document accompanying the application is fundamentally flawed in the following areas:
 - a. It fails to address how the Luas service will deal with the additional capacity that will be required to facilitate new residents in the proposed development and the surrounding developments where planning permission has already been granted.
 - b. It fails to assess the traffic impact within the Gallops estate, where traffic congestion is already a significant problem at peak traffic times.
 - c. One of its key working assumptions on the bus service is flawed as it does not take account of the changes proposed under the new Bus Connect plan from Dublin Bus.
 - d. Key data to support the conclusions on traffic impact are not provided in the report and therefore mean that independent verification of the numbers to support their conclusion is not possible.
2. The development is excessive in height compared to the neighbouring developments and will have an extremely negative visual impact on residents in Glencairn View, Glencairn Garth and Orby Avenue.
3. The number of access points from the new development into the Gallops is excessive and the requirement for emergency vehicle access through Orby Way is not justified.

1. Traffic and Transport Assessment

a. Luas Capacity

While the study carried out by DBFL purports to be a traffic and transport assessment, it primarily concentrates on road traffic and there is no attempt to look at how the Luas will be able to cope with the additional demand from both this proposed development and all the other residential developments in the surrounding area and along the Green Line to Cherrywood.

There appears to be a belief amongst the planning authorities and local government that the Luas has endless capacity, however capacity issues at peak times have already

emerged at the Glencairn Luas stop in early 2018 and were widely reported in the media. We therefore believe that planning permission for this development should be refused until a feasibility study on Luas capacity is undertaken.

b. Traffic Impact within the Gallops

The Gallops estate is different to many estates bordering the Luas line in that it is hemmed in by the M50 on the other side. This means that residents have no option but to cross a Luas line whether they are exiting by car, bike or on foot.

This issue is particularly acute for car traffic and the current Luas frequency means that at peak morning time, residents in the Gallops must queue sometimes for up to 15 minutes just to get out of the estate. We have the bizarre situation whereby there are traffic jams on junctions within a residential estate which is located over 12 km from the city centre of Dublin.

In performing their traffic assessment, DBFL took no account of this existing traffic issue, which was a fundamental error. Residents of the Gallops are now faced with a future of both increased car traffic and possibly increased Luas frequency, which means the internal traffic congestion within the Gallops is only going to get worse.

We would invite members of An Bord Pleanála to come and see the traffic congestion in early morning for themselves to see the problem first hand for residents in our estate.

c. Bus Service

The DBFL report includes a section on the bus services in the immediate area of the proposed development which they conclude are excellent, however this conclusion is fundamentally flawed because it takes no account of the Bus Connects plan which has been unveiled in recent months by Dublin Bus.

Under the plan, the local area will lose the key bus service of the 47 (and also the 63 which DBFL fail to mention in their assessment). The commuters who currently get the 47 on Murphystown Way, just across from the proposed development at Glencairn House, will be asked under the plan to get the Luas at the Glencairn stop and then connect to bus services in the Sandymount Industrial Estate. This will add further capacity demands on the Luas, which adds further weight to our first point above on Luas capacity.

This means that not only is the DBFL conclusion on bus services fundamentally flawed, it actually has no basis in fact.

d. Traffic Impact Assessment Data

In section 5 of their report, DBFL provide what looks like an impressive array of data to facilitate their assessment, however a closer analysis reveals that there are some large gaps in the information provided, which make it impossible for an independent assessment of their study to be carried out.

I would bring the attention of the Board to 2 examples. Firstly, in looking at the estimated traffic impact from other developments in the local area, the report does not provide a consistent time basis for the different assessments, with some based on 2020 projections and others based on 2035 projections. This makes it difficult to put together a cumulative picture of what the total traffic impact will be at any one time in the future.

Secondly, and much more fundamental, is that the report gives the reader no data on the existing level of traffic on the roads in the area. In making their conclusion on traffic impact from the proposed and surrounding developments, DBFL quote percentages which are below 5%, which they say are not material.

It is impossible though to verify this data independently because as we have pointed out above, the data for the numerators in these calculations (i.e. the projected additional traffic) is not provided on a consistent timeline, and the data for the denominator in these calculations (i.e. the existing traffic levels) is not provided at all.

Our analysis of the limited data provided, suggests that there could be up to 600 additional cars added to the local road network from the proposed Glencairn development and other developments locally. If we are to take DBFL's conclusion that this leads to a cumulative impact of less than 5%, then this suggests that there are already more than 12,000 cars at peak time on the local road network, which does not seem plausible.

2. Proposed Height & Visual Impact

The proposed development includes the building of eight apartment blocks, ranging from 2 storeys to 5 storeys on an elevated site adjacent to the Gallops estate, which is a mature residential development of 2 storey houses.

In section 4.8 of Appendix 9 (Building Height Strategy) to the DLRCC County Development Plan, it states that "a maximum of 3 to 4 storeys may be permitted in appropriate locations" and the proximity of a Luas stop within 500 metres can be used as an upward modifier to justify additional height.

Despite the proximity of the Luas, we believe that the building of apartment blocks to 5 storeys is an unacceptable height, as it will have a severe negative impact on local residential living conditions through overlooking, overshadowing and excessive bulk and scale. This will be particularly acute for residents living in Glencairn Garth, Glencairn View and Orby Avenue, where apartment blocks are being proposed close to the boundary wall with our estate. An impact such as this is identified as the principal downward modifier to building height by DLRCC in the same appendix quoted above, so we believe that the application should also be refused on this basis.

3. Number of Access Points

The proposed application includes putting in 3 access points into the Gallops at Glencairn View, Glencairn Chase and Orby Way, to provide permeability. The Orby Way access point is also wider to allow emergency vehicle access.

We believe that this is an excessive number of access points and we do not see the justification for the emergency vehicle access required at Orby Way.

In conclusion, while we understand the need at a national level to provide more housing, this planning application is severely flawed in that it has not properly assessed the impact that it will have on the traffic and transport infrastructure in the area, particularly in terms of Luas capacity, local road congestion and the knock-on traffic congestion that will occur in the Gallops estate.

In addition to this, the proposed development will have a negative impact of the quality of life of residents in the Gallops due to the excessive height of the development and the excessive number of access points.

We would therefore implore the Board to refuse planning permission for this development on the grounds outlined above.

Thank you for reviewing our appeal.

Yours faithfully

Kevin Windle
Chairman
Gallops Residents Association
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