



Cllr. Oisín

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GLENCULLEN-SANDYFORD

## Submission on Cromahurst (Lamb's Cross) planning application

August 2023

Dear Planning team,

Please find below my observation on the planning application at Lamb's Cross, "Cromahurst", planning reference D23A/0456.

If you would like to follow up on anything in this submission, please feel free to reach out to me on [ooconnor@cllr.dlrcoco.ie](mailto:ooconnor@cllr.dlrcoco.ie).

Kind regards,

Councillor Oisín O'Connor  
Glencullen-Sandyford area  
Dún Laoghaire-Rathdown County Council

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## Environmental

Going two storeys down for double basement parking is not going to work with the nearby newt ponds, a key part of the ecosystem in Fitzsimon's Wood, a proposed Natural Heritage Area. All around the area there is hard granite rock beneath the surface and it is likely that explosives will be needed to go two storeys down. There is no acknowledgment of this in the application and no plan for it. It is a common trend, seen with other applications in the area. Applications get made on the basis of a report saying there's not much granite rock, then building contractors have to contend with large amounts of granite rock going down deep. It would be unacceptable to grant permission for this two storey basement only for future construction management plans to get through that allow such environmentally damaging groundworks. With the basement reduced to a single level basement, the amount of development may need to be reduced accordingly.

Previous permission was refused on the basis of de-watering the newt ponds to the west. The hydrological report seems to suggest that this would still be happening under the current proposal. The applicants don't seem to have committed to any mitigation measures in the planning application.

If permission is granted for the development, the recommendations in the Ecological Impact Assessment should be included as Planning Conditions, including the mitigation measures under Section 6.4. The same for this extract from the EIA:

*To further reduce the risk of any temporary impact on water levels at the newt pond areas the following mitigation measures are recommended:*

- *Excavation work planning should be managed to minimise the period of time any excavated areas are left open prior to sealing of boundary walls and excavation floor level.*
- *Works should be planned to preferentially install foundation perimeter walls along the western boundary of the excavations to minimise any shallow lateral drainage into the excavation from the west.*
- *Phasing of the excavation works required to minimise the period of time excavations are open.*
- *Timing of the excavation works, to coincide with the breeding off season for the smooth newt (February to September inclusive).*
- *Supervision by an ecological clerk of work to inspect ponds prior to and during the*

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*proposed excavation/dewatering works.*

The site is located in/adjacent to one of the Wildlife Corridors mapped in the DLR Biodiversity Plan but no mention is made of how the development specifically will keep the site open as a wildlife corridor. This was one of the reasons for refusal of the application for a development on Blackglen Road recently. Design changes and information could be sought by way of a Request for Further Information, so that the applicant amends this application to include measures that preserve the wildlife corridor.

## Transport demand

Parking ratio is quite high for the residential. By providing such high amount of car parking the development would be encouraging more car owners into the area, which already has high levels of car use for legacy reasons.

Public transport is due to improve with 4 new Bus Connects routes passing by Lamb's Cross. At present there are 22 buses a day passing through Lamb's Cross on weekdays. The preliminary Bus Connects timetable indicates that there will be 82 buses on weekdays going through Lamb's Cross. However, the application makes reference to and seems to rely upon a "Quality Bus Corridor" along the Enniskerry/Sandyford Roads. In reality, this is not in existence and is very unlikely to ever be so. There are some bus lanes at various points but it's not a QBC.

The 286 bike parking spaces to be provided are a positive. Putting the bike parking facilities at level -2 is not a positive. The amount of uphill cycling a resident would need to do just to exit development does not fulfil the requirement for bike parking to be accessible as per Section 12.4.6.2 of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (DLR CDP). To cater for growing use of electric bikes, cargo bikes, non-standard cycles (e.g. adapted for people with disabilities), bike parking facilities for residential use and commercial use should be designed to cater for this growing demand. E-bike charging facilities for residential and general public use should be provided. Bicycle repair stations including pumps for residential and general public use should be provided.

On Page 19 of the Travel Plan, the applicant sets out mode share targets for the development. The targets show a 54% target for sustainable transport. In the DLR CDP, the policy objective "T4: Development of Sustainable Travel and Transport" has a target of 70%

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sustainable modes by the end of the plan 2028. It's understood that this will mainly be reached by new developments exceeding the overall sustainable transport target of 70%, as residents existing development will be slower to shift modes. Given this, the applicant should revise their overall travel plan to target a higher sustainable transport mode share than 70%. They should also adjust the development accordingly to enable even more sustainable transport.

### Road safety

Section 12.3.4.1 of the DLR CDP states "Continuous footpaths shall be provided at junctions, and vehicular entrances, to facilitate people with ease of movement." The existing road layout of the main vehicular entrance in the application is not compliant with this requirement. The design of the main vehicular entrance to the development should be changed to a retain the existing continuous footpath (and cycle track) to reflect that pedestrians and cyclists have priority over turning vehicular traffic. The current proposed design of the cycle track is not compliant with DMURS or the draft new National Cycle Manual and should be conditioned to be designed to the satisfaction of the council. Given the use of this Neighbourhood Centre site will likely involve a degree of short visits by passing motorists and delivery drivers, the applicant should be required to fund and implement measures to prevent fly parking on the footpaths and cycle tracks adjacent to the development, designed to the satisfaction of the council. This may involve shifting the cycle track and footpath over 50cm closer to the development and installing a green buffer between the road and the cycle track that does not diminish the public realm.

Any vehicular exit from the development should also have footpaths and cycle tracks on both sides to aid in pedestrians and cyclists joining the active travel network without having to queue in vehicular congestion. The current vehicular arrangement would inevitably lead to cyclists mounting the footpath to skip queues of vehicles waiting to exit onto the road.

There is a Road Safety Assessment accompanying the application that includes a lot of recommendations to revise the road access layouts and the planners should require that these be addressed through a clarification of further information, in the interests of full transparency rather than by way of compliance condition which is a more opaque process to the public.

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It doesn't seem to make sense to have the vehicular entrance exit onto Sandyford Road when it is a more major road than Blackglen Road on the other side of the development. I would ask the transportation team to look at whether it would be safer to have the vehicular entrance off the Blackglen Road instead.

The Construction Management Plan for the development should include a condition that the developer is not to close off footpaths or cycle tracks on either Blackglen Road or Sandyford Road for any period during the works except for when work is required on those roads (e.g. for utilities connections). There should be a condition that pedestrian and cyclist movements are segregated from each other and from general traffic for the duration of any such on-road works by the applicant, in the interests of road safety and in recognition of the importance to encourage active travel under all road conditions.

There should be a planning condition that the (brand new) footpaths and cycle tracks in the vicinity are not to be used as loading or waiting zones during the construction period for any reason.

The County Development Plan requires at least one loading bay for all developments greater than 50 residential units, for the purpose of serving those units, given the trend towards home deliveries. Commercial premises, especially supermarkets, also need loading bays, sometimes for larger HGVs. The whole development proposes to have 1 loading bay which is wholly insufficient. The applicant should be made to come back with a more realistic level of loading bays. Otherwise, it is easy to foresee the footpaths, cycle tracks and bus stops becoming free and dangerous loading bays for the development.

## Planning and facilities for the area

There is likely to be a significant growth in housing in the area over the coming years, with lands long-zoned residential being "unlocked" by the Blackglen Road improvement works. Along with existing residents, the hundreds of new residents will be in need of basic facilities such as a supermarket. So I support the provision of a supermarket here for local use by the hundreds of residents that do/will live nearby.

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## Childcare

In the Community Infrastructure Report, the applicant seeks to claim that the residential element of the development will generate demand for 15 childcare spaces based on 2016 rates of 0-6 year olds in the area and 2016 rates of childcare attendance in all Dublin.

These are both flawed logic because:

- a) The 2016 rate of 0-6 year olds in the area reflects the more mature nature of the area at that time compared to what it has become with more younger families having moved into newer developments. Brand new developments like this attract younger families and young childless couples. Even moreso because they are apartments with a higher likelihood of being rented.
- b) The 2016 rates of childcare attendance are likely to be much lower than what they are today because of new childcare subsidies made available in the last few years. The number of providers needs to grow to meet the demand that these subsidies have led to.
- c) The number of 4 year olds starting school has declined in recent years, meaning an increase in demand for childcare places as children spend longer in pre-school care.

The applicant may be using the latest available data in good faith, but due to these factors it's still an underestimation of the childcare demand from the 80 new apartments.

The applicant seeks to rely on creches built in other developments (one which has started construction but all the others still awaiting a planning decision or a decision on a judicial review). What the applicant doesn't list is all the other residential developments that are proposed, permitted and under construction that will rely on these new creches to cater for demand.

This location would be a very convenient location for a creche/afterschool. The applicant in fact missed the two pre-schools closest by, Lamb's Cross Pre-School and Lambkin's Montessori, both of which only take children from aged 2½ onwards. But apart from these, there is only one creche (Giraffe) within a 10 minute walk of the development, which is already at capacity.

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By all this logic, the new development should include a childcare facility and I am asking the planning team to seek one by way of a further information request.

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