

ISSUE RAISED	OBSERVER NO.
<p><b>Overdevelopment/Impact on Amenity</b></p> <ul style="list-style-type: none"> <li>• Density/footprint excessive – 10 times floor area of existing/3 times floor area of permitted Flanagan’s</li> <li>• Scale/height/mass/bulk excessive relative to single/2-storey residential</li> <li>• Plot ratio of 3.8:1 more suited to City Centre/Beacon Quarter</li> <li>• Contrary to building height strategy – topography negates walkability/proximity to QBC</li> <li>• Basement – 3 no. underground levels – overly engineered/out of character with area</li> <li>• Contrary to Sustainable Residential Dev. Urban Areas Guidelines</li> <li>• Impact on Residential Amenity – overlooking, overshadowing, loss of privacy</li> </ul>	<p>2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 27, 28, 30, 33, 34, 35, 36, 37, 38, 39, 40, 42, 43, 44, 46, 47, 48, 49, 51, 52, 53, 55, 56, 57, 58, 59, 60, 61, 62, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 78, 80, 81, 82, 83, 84, 86, 87, 88, 89, 90, 91, 92, 93, 95, 96, 97, 98, 99, 100, 101, 102, 104, 105, 106, 107, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 130, 131, 132, 133, 134, 137, 138, 139, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 152, 153, 154, 155, 156, 157.</p>
<p><b>Impact on visual amenities/character of area</b></p> <ul style="list-style-type: none"> <li>• Design inconsistent with Neighbourhood Centre function</li> <li>• Design/scale out of character and unsympathetic to the low density residential suburban area</li> <li>• No sense of place – design fails to connect with topography or scale/architecture of surrounding development – should reduce towards boundaries/with slope</li> <li>• Design excludes community – footprint to edge of site, incorporates green space, retail at elevated level</li> <li>• Interface with surrounding residential streets inappropriate – no active frontage at street level, vehicular access points/service areas – creates divide within NC</li> <li>• Materials inappropriate</li> </ul>	<p>2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 15, 16, 17, 18, 19, 20, 22, 23, 24, 25, 27, 31, 32, 40, 43, 44, 45, 46, 49, 50, 52, 53, 55, 56, 57, 58, 59, 60, 65, 66, 67, 70, 71, 72, 78, 80, 84, 86, 87, 88, 89, 91, 92, 93, 97, 98, 100, 101, 102, 110, 112, 115, 116, 117, 118, 119, 120, 122, 124, 125, 126, 131, 132, 133, 134, 137, 139, 141, 142, 143, 144, 145, 148, 150, 151, 152, 153, 156, 157.</p>

<ul style="list-style-type: none"> <li>• Cumulative visual impact with permitted dev at Flanagan's</li> </ul>	
<p><b>Impact on Heritage/Protected views</b></p> <ul style="list-style-type: none"> <li>• Garden city suburb developed in 1930s – scale and design erodes integral character of designed suburb of great historical and architectural merit</li> <li>• Obstructs Protected Views from Deer Park – CDP objective to preserve</li> <li>• Obstructs cherished views within neighbourhood of church, park, greenery characteristic of suburb</li> <li>• Stansted (Protected Structure) – at a lower ground level – will be visually obtrusive and detrimental to setting and character of PS. Trees will not mitigate impact.</li> </ul>	<p>5, 6, 7, 12, 15, 17, 20, 25, 32, 43, 46, 54, 56, 58, 59, 60, 66, 67, 70, 71, 72, 84, 86, 88, 89, 90, 91, 92, 96, 97, 98, 100, 101, 104, 107, 115, 116, 118, 120, 122, 123, 124, 133, 137, 141, 143, 144, 149, 151, 153, 156.</p>
<p><b>Zoning - Inappropriate mix of uses for Neighbourhood Centre</b></p> <ul style="list-style-type: none"> <li>• Nature/scale/extent uses – excessive and inappropriate to Neighbourhood Centre zone</li> <li>• Overly commercial – doubles commercial floorspace</li> <li>• Nature/extent of retail and parking – creates retail destination, dependent on wider catchment – not NC</li> <li>• Resid impact – gym, café, pub, restaurant – noise and activity at all hours of day and night – inappropriate to NC in resid area</li> <li>• Sense of community destroyed – Development fails to understand very strong sense of community centred around church, school, community centre, park, playground and shops. Social character/community depends on existing mix of uses which would be significantly compromised by design, scale and nature of uses and additional traffic generated.</li> </ul>	<p>1, 2, 4, 5, 6, 7, 8, 9, 10, 15, 17, 19, 21, 22, 23, 24, 26, 27, 28, 30, 31, 32, 36, 38, 40, 42, 43, 44, 46, 47, 48, 49, 51, 52, 53, 55, 56, 58, 59, 60, 61, 64, 65, 67, 69, 70, 71, 72, 73, 76, 78, 80, 81, 83, 85, 86, 87, 88, 89, 90, 91, 92, 94, 97, 99, 100, 101, 102, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 130, 131, 132, 133, 134, 136, 139, 141, 142, 143, 144, 146, 147, 148, 149, 151, 153, 154, 155, 156, 157.</p>

## Retail impact

- Retail Impact Assessment flawed – ignores existing floorspace and RPG threshold.
- Area very well served by retail provision in Mount Merrion, Stillorgan, Blackrock and Dundrum. Existing retail provision in NC also adequate.
- Proposed retail floorspace excessive and unjustified – contrary to RPGs and CDP policies RET3 & RET11 which urge caution.
- Existing businesses will be severely impacted – no population increase and retail sales figures inaccurate and incomplete
- Supermarket too large – 1300m<sup>2</sup> compared to Tesco Stillorgan, 1476m<sup>2</sup>. Will attract/depend on catchment outside of Mt Merrion with excessive traffic generation.
- Cannot control operator – floorspace indicates more likely to be Lidl, Aldi or Tesco. Thus, no control over deliveries which would be by articulated truck.
- Niche operator – already provided for in area – Supervalu, The Rise and Donnybrook Fair at Stillorgan
- Precedent Flanagan’s refusal for retail dev relevant to this.

1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 38, 39, 42, 43, 44, 45, 46, 47, 48, 49, 50, 52, 54, 56, 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 78, 80, 81, 82, 84, 85, 88, 89, 91, 92, 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 107, 109, 110, 112, 114, 115, 116, 117, 118, 119, 121, 122, 123, 124, 126, 127, 130, 131, 133, 134, 136, 137, 141, 143, 144, 146, 147, 148, 149, 150, 151, 153, 154, 155, 156, 157.

## Housing provision

- Residential mix & layout inappropriate – accept housing shortage and need for densification, but not solution. Will be student/short term rental accommodation
- Does not address supply/demand – need spacious 2/3 bed apartments with outdoor space.
- Will not be attractive the ‘Empty Nesters’ as too small and located over noisy commercial uses

5, 8, 15, 30, 38, 44, 56, 58, 59, 62, 67, 76, 81, 82, 84, 87, 88, 92, 101, 107, 117, 120, 122, 123, 136, 143, 149.

<ul style="list-style-type: none"> <li>• Inadequate social infrastructure to accommodate residential on scale proposed together with permitted apartments at Flanagan’s</li> </ul>	
<p><b>Traffic impact on road network</b></p> <ul style="list-style-type: none"> <li>• Traffic Impact Assessment flawed – surveys and trip generation based on inaccurate information. The surveys were off-peak, were undertaken when the existing pub/café was closed, excluded weekend traffic and Flanagan’s pp.</li> <li>• Existing traffic congestion from rat running, school runs, UCD, access to Sandyford Ind Est, leisure uses – park, pub, Union café. This will be exacerbated by proposed commercial floorspace combined with Flanagan’s permission.</li> <li>• Road network wholly inadequate for level of traffic generation – narrow roads unable to cope with congestion at present. Weight limit on Deerpark Rd also.</li> <li>• Traffic calming had to be installed throughout area to deter rat running. Chicanes, ramps and mini roundabouts render parts of network mean roads are unsuitable for HGVs, articulated trucks, service deliveries, waste collection vehicles and construction traffic.</li> <li>• Residents commissioned own traffic survey (attached to Obs. No. 08).</li> <li>• Service deliveries – impact inadequately assessed.</li> <li>• Over-reliance on ‘walkability’ and proximity to QBC – no account taken of steep gradients and elderly population.</li> <li>• Cumulative impact – Flanagan’s, Knockrabo, Gate House, Cedar Manor.</li> </ul>	<p>1, 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 154, 155, 156, 157.</p>

**Road safety**

- Community focus of NC and clustering of community uses generates high pedestrian footfall. This encourages the elderly and children to walk which reinforces the sense of community. Road safety is critical to the preservation of this safe, community environment.
- Traffic calming introduced to address narrow roads and high traffic volumes will be undermined by proposed development.
- Deerpark Rd/North Ave junction is very busy and hazardous - provides access to shops, church, park, school, pub, café and to permitted development at Flanagan's. This junction has poor visibility, as located on a curve with a pinch-point on North Ave and on-street parking on Deer Park Rd. Traffic calming measures and sloping gradients reduce visibility further.
- Proposal introduces excessive no. access points in close proximity to the substandard Deerpark/North Ave junction. Residential access on Deerpark, Commercial access on North Ave and Service access on Wilson Road. Entrances too close to junction
- Road safety compromised by service vehicles.
- No Road Safety Audit undertaken – disagree that not a requirement.

1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 36, 38, 39, 40, 41, 43, 44, 46, 47, 48, 49, 53, 54, 56, 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 70, 71, 74, 75, 77, 79, 80, 81, 82, 83, 84, 87, 88, 89, 90, 91, 92, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 105, 106, 108, 109, 110, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 146, 148, 149, 150, 151, 152, 153, 155, 156, 157.

**Car parking**

- Inadequate parking provision – contravenes CDP stds. 8.2.4.5 and shortfall of 34 spaces. Does not comply with stds. Re disabled, mother and child, and electric car charging points.
- Underground parking uncondusive to delicatessen shopping and impractical for parents with buggies. It will increase pressure on on-street parking and lead to illegal parking.
- Insufficient parking at present –

1, 4, 5, 11, 14, 17, 19, 22, 24, 25, 26, 28, 29, 30, 44, 45, 46, 52, 54, 56, 57, 60, 61, 67, 76, 78, 82, 88, 89, 90, 94, 95, 99, 100, 109, 114, 115, 116, 118, 120, 122, 124, 125, 126, 133, 136, 138, 140, 141, 143, 144, 154, 156.

<p>exacerbated by Deer Park and Union Café – 113 spaces at present and proposed 113.</p> <ul style="list-style-type: none"> <li>• No account taken of impact of users of Deer Park and of the church (especially for funerals) on parking demand. No provision for staff parking.</li> <li>• Existing on-street parking bay(s) to be replaced by loading bay – increases pressure.</li> <li>• Wrong parking standard applied by developer 1:50 for shopping centre dev applied to total retail floorspace. Should have applied 1:20 for convenience shopping.</li> </ul>	
<p><b>Construction impacts</b></p> <ul style="list-style-type: none"> <li>• 3 subterranean floors will necessitate the excavation and removal of an enormous amount of material and the introduction of 10,000m<sup>3</sup> of concrete with implications for transport, noise, dust and nuisance over an extended period of time.</li> <li>• This volume of material could result in 15,000-20,000 truck movements a day. This has not been adequately assessed.</li> <li>• Granite presence – no contingency plan. It is not certain that the material to be removed will not contain substantial amounts of rock – the site is located on a granite outcrop overlooking the bay. Notwithstanding the test results, it is likely that blasting will be required.</li> <li>• Access for construction traffic is extremely limited with narrow, traffic-calmed roads with substandard structures. Evidence of a collapsed road during works recently. Site located at junction of 3 narrow roads.</li> <li>• Inadequate consideration of impacts such as rock breaking, impacts on hydrology, interaction with groundwater regime, analysis of truck movements.</li> <li>• Cumulative impact of construction</li> </ul>	<p>5, 7, 18, 21, 23, 24, 28, 29, 31, 32, 38, 44, 46, 51, 52, 54, 55, 57, 58, 60, 67, 70, 74, 76, 81, 88, 89, 92, 95, 96, 97, 100, 101, 104, 105, 108, 112, 123, 125, 126, 128, 132, 133, 135, 137, 139, 145, 149, 155, 156, 157.</p>

<p>works on this and Flanagan's site not considered.</p>	
<p><b>Surface water drainage/water supply</b></p> <ul style="list-style-type: none"> <li>• Infrastructure in area is inadequate to cater for new development on this and Flanagan's sites – water, sewerage, roads.</li> <li>• Development will put huge burden on ageing infrastructure</li> <li>• Water supply will not be able to respond to demand without reduction in water pressure.</li> <li>• Surface water drainage inadequacies already result in water cascading down North Ave in heavy rain.</li> <li>• There is evidence of underground streams and the water table may be affected by excavation.</li> <li>• Waste collection in the proposed development has not been adequately addressed.</li> </ul>	<p>3, 5, 11, 15, 17, 22, 38, 42, 52, 53, 54, 57, 58, 59, 69, 72, 81, 83, 92, 101, 104, 105, 108, 109, 114, 117, 123, 124, 133, 137, 141, 145, 149, 156.</p>
<p><b>Land ownership</b></p> <ul style="list-style-type: none"> <li>• Inadequate title - grass strip on Wilson Road. This will require permission from DLR and legal title.</li> <li>• Opening of access onto North Avenue – no legal title/permission for this.</li> </ul>	<p>60, 83, 88, 97, 109, 151.</p>
<p><b>Consultation inadequate</b></p> <ul style="list-style-type: none"> <li>• Over 300 submissions to DLR indicative of level of overwhelming opposition to the development in the local area. No support locally for this project although support for redevelopment at appropriate scale.</li> <li>• Community has been ignored with no meaningful engagement. There were no significant change to the proposed development following meeting with community.</li> </ul>	<p>4, 5, 6, 14, 15, 16, 18, 21, 22, 24, 26, 30, 31, 32, 37, 39, 42, 43, 48, 53, 57, 58, 59, 71, 73, 74, 76, 77, 81, 83, 84, 86, 87, 88, 90, 92, 96, 98, 101, 105, 109, 110, 115, 117, 119, 120, 122, 123, 127, 130, 134, 143, 144, 147, 150, 153, 155, 156.</p>

