

20/06/2022

An Bórd Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

Re: Great Connell SHD: ABP Reference: 313306. Applicant: Aston Ltd.  
(Also referenced as ABP-311390-21 in the Applicant's cover letter)  
Observation on behalf of Paul & Wendy Aitken, and other residents (as per attached signature pages) of Wellesley Manor Estate, Newbridge, Co. Kildare.

Dear Sir/Madam,

On behalf of our clients, Paul & Wendy Aitken, owners and residents of 82 Wellesley Manor, together with the other residents (as per attached signature pages) of Wellesley Manor Estate, we submit this observation on the above SHD. We would be grateful if An Bórd Pleanála could take these points into consideration in issuing their decision in this case.

**(1) Scope of the application insofar as it affects adjacent lands:**

We note that item 10 of the Site Notice states:

*'The proposed development facilitates future potential pedestrian, cycle and vehicular links to adjoining residential developments and undeveloped lands'*

We respectfully request An Bórd to recognize and accept that permission for such links, be they desirable or otherwise, does not therefore form part of this application and are subject to a future planning application. This is an important consideration for the residents of Wellesley Manor who would need to have an opportunity to fully evaluate such proposals.

**(2) The relevant Planning Statutory Framework:**

Reference is made repeatedly in the Application documents to the Newbridge Local Area Plan. However, we submit that relying on any provisions of this Plan is unsupportable on the basis that it was prepared in 2015-2016: was enacted in 2016; was due to expire in 2019 when it was extended for 2 years until 21<sup>st</sup>. December 2021. It has now therefore lapsed. Page 8 of the Architectural Design Statement, makes reference to:

*2. Newbridge Local Area Plan 2016–~~2022~~ (extended to 21 December 2021) (LAP); [My emphasis]*

In the normal course of events such an incorrect date (2022) referenced might not be considered significant, particularly as it is qualified by the statement *'extended to December 2021'*. However, it has the potential to mislead observers into thinking that the LAP remains in force.

**(3) The Principle of Residential Development:**

The principle of residential development in this location is very much to be welcomed. However, there are aspects of the proposed development which would appear not to be in keeping with the proper planning and development of the area, principally by virtue of their harmful impacts on the receiving environment in general, and the Wellesley Manor Estate in particular.

**(4) The accuracy (or otherwise) of the Application documents:**

We refer An Bórd to the following application drawings:

PA-003\_PROPOSED SITE LAYOUT PLAN—SHEET 1

PA-023\_PROPOSED SITE SECTION AND CONTIGUOUS ELEVATIONS N-N, O-O, AND P-P

We submit that there appears to be a discrepancy between the Proposed Site Layout Drawing and Section P-P (Part 1 of 2) in relation to the distance between Duplex Block 8 and the rear of the houses in Wellesley Manor: On the former, a dimension of 67330 is given, whereas we calculate the distance to be in the order of 53100. Should we be correct in this assertion, the representation of the proximity of the proposed development to the existing houses in Wellesley Manor is understated by over 14 metres: this is both significant for the owners in Wellesley Manor who may be relying on these drawings to ground their opinion on the scheme, but is also 'material' from a Planning perspective. It is unhelpful, and may be 'material', that the distance of Block 8 from the site boundary is not indicated on this drawing.

We further note that on Figure 15 on page 28 of the Architectural Design Statement, a significant part of the Neighbourhood centre is labelled '2 storey residential' which is clearly not the case.

We submit that the accuracy of the drawings must be called into question and would respectfully request An Bórd to consider whether the application can be considered valid in such circumstances.

**(5) Irish Water Wayleave compromises site:**

The development site is essentially bisected north-east/south-west by the wayleave which has the following possible outcomes:

- A disproportionate concentration of development is channelled into a narrow strip of land adjacent to the Northern boundary of the site, which is precisely the most sensitive in terms of the receiving environment, or,
- The land adjoining the northern boundary of the site could be developed as open/public space which would remove the worst impacts in terms of overlooking, overshadowing, and loss of amenity to the existing residences in Wellesley Manor, particularly those whose south-facing back gardens adjoin the boundary with the development site.

In choosing the first option above, the visual, loss of amenity and overlooking impacts are rendered more acute.



# OPTIMISE

DESIGN

**(6) Different iterations of plan forms within the proposed development immediately adjoining the site's Northern Boundary:**

In common with many such development proposals, the architects correctly sought to explore different plan forms for different parts of the site. Of particular relevance to the Northern boundary are the following options presented:

Plan Iteration 1: This shows houses (not apartments/duplexes) backing onto the rear gardens of the houses in Wellesley Manor.

Plan Iteration 2: This shows blocks at right angles to the rear gardens of the Wellesley Manor Houses.

Plan Iteration 3: This shows continuous long blocks of duplex apartments, with a large 'community' facility at the north-east corner of the site.

Plan Iteration 5 (a further development of Option 3) forms part of the application documents. No convincing explanation in Planning terms is offered for the selection of this plan iteration as the chosen plan form, at least in so far as it affects the Wellesley Manor houses. The rationale for so doing is clearly to do with planning issues elsewhere within the development such as the location of public open spaces, etc. We submit that in bypassing Iteration 1, which was clearly the most appropriate form of development facing the back gardens of the Wellesley Manor houses, the application fails to address one of the most sensitive locations in the receiving environment.

**(7) Fragmentary Provision of Public Open Space:**

Of the 27,555 Sq.m. of Public open space (excluding swales) stated as being provided, it is noted that only one of these spaces (That with stated area of 4,402 Sq.m.) exceeds 10% of the total provision. The remainder of the space is provided in pockets of varying sizes and suitability in 17 No. other locations. We submit that, in a major new development such as this, such a fragmented provision is not in accordance with best development principles and can result in spaces which will never be used by a large number of future residents.

**(8) Context and Appropriate Density:**

While the applicant acknowledges that the Wellesley Manor estate has '*a relatively low density*', the density is not stated, presumably because it would throw into sharp relief the density of the subject application. The applicant states that '*the SHD scheme approved to the south-west across the Liffey has a density of c. 37/38 units per hectare and it was considered that this gives a more appropriate density target for the efficient development of the lands*'. We submit that this unsupported statement represents a false premise: The approved scheme referenced is essentially a self-contained development and its receiving environment has no proximities or boundaries which are as sensitive as the boundary with the Wellesley Manor estate. It is submitted that for this reason, as well as others, the density of the subject site is inappropriate and is at its most dense in its north-eastern quarter; precisely the most sensitive locus in the receiving environment.

**(9) Development premature pending the development of suitable and adequate school facilities:**

in the context where there are not enough spaces for children of school-going age in the local community, a development on the scale proposed will further accentuate this problem leading to the necessary displacement of children to more distant schools.

**(10) Development premature pending completion of NSORR and new bridge over the Liffey:**

The new NSORR road, together with the bridge over the River Liffey, could take many years to complete and the traffic movement infrastructure of the proposed development could be undermined in the interim. Significant traffic congestion could occur at the Great Connell Road intersection. In relation to the proposed development, it is noted that vehicular access to Duplex blocks 7,8 and 9 is only possible from a road between the rear elevation of blocks 8 & 9, and the boundary with the Wellesley Manor Estate. This road gives access to the parking for each of the three blocks and it comes to within 11585mm of the site's boundary with Wellesley Manor. The elevations of Blocks 8 & 9 will reflect sound from vehicles moving along this road towards the rear elevations of the houses in Wellesley Manor, with consequent loss of amenity and noise 'nuisance'.

**(11) The approach to building heights:**

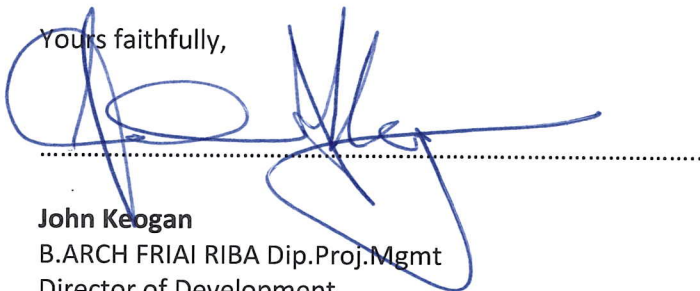
At page 29 of the Architectural Design Statement, reference is made to DHPLG's Urban Development and Building Heights—Guidelines for Planning Authorities (December 2018), and in particular the following provision:

*1.21 Increasing prevailing building heights therefore has a critical role to play in addressing the delivery of more compact growth in our **urban** areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured. [My emphasis].*

It is submitted that this site does not constitute an 'urban area' by any stretch of the imagination and it is submitted that attempting to invoke its application in the context of justifying increased height on the subject site must fail.

We trust An Bórd will consider the above in making a decision on this SHD Application.

Yours faithfully,



**John Keogan**

B.ARCH FRIAI RIBA Dip.Proj.Mgmt  
Director of Development

T: 01 661 9020 | M: 086 812 1221 | E: [john@optimise-design.com](mailto:john@optimise-design.com)

[Encls: Signatures of other residents]

- Reference = 22/313306/ Greatconnell SHD Newbridge

Developer = Aston – Limited

- We The Undersigned Object To The Above Development as Per Our Submission.

Name	Address	Date
Nerdy Arker	82 Wellesley MANSOR	31/5-/2022.
Mal Moore	83 Wellesley Mansor	31/5/22
Lorraine Crowe	✓ ✓	✓
N. A. Crowe	✓ ✓	✓
ALAN CROWD	✓ ✓	✓
Eoin O'Brien	85 " "	31-05-2022.
TIA O'Brien	85 " "	31-05-2022
	<del>86</del>	
	<del>86</del>	
	<del>87</del>	
	<del>87</del>	
	13	
	13	
	11	
	12	

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Name	Address	Date
DIANE BROWN	8 WELLESLEY MANOR	31/5/2022
LIAM BROWN	"	"
JOE BROWN	"	"
JAMES BROWN	"	"
Collette Heale	7 Wellesley Manor	31/5/2022
Brian Heale	"	"
Amy Heale	"	"
Stephen Lynch	6 0868988825	31/5/2021
Louise Durrain	6	31/5/2021
Lynette	5 "	31/5/2021
Saffron Durrain	5 " "	31/5/2021
David Durrain	5 " "	31/5/2021
MARK Durrain	5 " "	31/5/2021
Georgia Durrain	5 " "	31/5/2021
	9	



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Name	Address	Date
Aidan Venables	23	31/5/2022
Travis Coates	24	31/5/2022
Helen Munro	24	31/5/2022
Renee Munro	24	31/5/2022
Sophie Coates	24	31/5/2022
	28	
Anna Patrick-Anson	26	31/05/22
Paul Madgett-Anson	26	31/05/22
Adrian Keenan	27	31/05/22
Conor Murphy	27	31/05/22
Eilish Brady	30	31/05/22
Paul Brady	30	31/05/22
Michael [Signature]	30A	31/05/2022
	30A	

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Name	Address	Date
	4	
	4	
	3	
	3	
	2	
	2	
Valerie Mahon	1	31/5/22
Tom Mahon	1	31/5/22
<del>George Burke</del>	84	31/5/22
<del>Ernest Fegan</del>	84	31/5/22
<del>Seán B...</del>	84	31/5/22
Maureen Dunne	71	31/5/22
Sophie O'Donovan	71	31/5/22
David Nolan	71	31/5/22
	<del>70</del>	<del>31/5/22</del>

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Name	Address	Date
Hanna Cawzer	69	31/5/22
Mark Cawzer	69	31/5/22
	68	
	67	
	65	
Dorothy Telvan	86	31/5/22
Sean Telvan	# 86	31/5/22
Lisa Telvan	# 86	31/5/22
Patrick Brett	87	31/5/22
Rebecca Jordan	87	31/5/22
Jim Jordan	87	31/5/22
Emma Brett	87	31/5/22
Joseph Dwyer	14	31/5/22
Johnathon Dwyer	14	31/5/22
	15	31/5/22

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Name	Address	Date
	15	
Pamela Bradley	16	31/5/2022
PATRICK BOGUEL	16	31/5/2022
Kate Whitworth	81	31/5/2022
Perry Whitworth	81	31/5/2022
MARIANA SILVA S	19	31/5/2022
Mihai CUCURITA	19	31/5/2022
CATALINA CONDURAI	19	31/5/2022
	20	
	20	
	21	
	21	
	22	
CATHERINE VENABLES	23	31/5/2022
Gerard Venables	23	31/5/2022

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Name	Address	Date
Marian Purso	3 Wellesley Manor	14/6/22
Manan Smyth	Great Connell	13/6/22
Sinead Jullian	Great Connell	13/06/22
AEVE WRIGHT	35, Wellesley Manor	13/06/2022
Sara Shui	35, Wellesley Manor	15/06/22
Beede Lysopt	32 Wellesley Manor	13/6/22
KADOSZAN SWOREK	31 WELLESLEY MANOR	13/6/22
DARROL HOLDEN	18 Wellesley Manor	13/6/22
Mark Holden	18 Wellesley Manor	13/6/2022
Sinead Jullian	20 Wellesley Manor	14/6/2022
Sarah Yeatman	21 Wellesley	14/6/2022
Becky Hemmery	13 Wellesley Manor	14/06/2022
Suzie Donohue	53 Wellesley Manor	15/06/2022
Sheila Sullivan	61. Wellesley Manor	15/06/2022
JORGE GARCIA	64 Wellesley Manor	15/06/2022

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- We The Undersigned Object To The Above Development as Per Our Submission.

Name	Address	Date
		6/6/2022
MURRAY LAWRY	17 WELLESLEY MANOR GREAT CONNELL	u
Jimmy Hedley	17 Wellesley Manor Great Connell	u
GEARÓID MCGAURAN	41 Wellesley Manor Great Connell	6/6/2022
R. Kelly	42 Wellesley Manor, Newbridge	6/6/2022
Daniel Kelly	44 Wellesley Manor Newbridge, Wicklow	6/6/2022
Larry Maguire	46 WELLESLEY MANOR NEWBRIDGE	
Padraic Dunn	47 Wellesley Manor Newbridge	6/6/2022
Howard O'Leary	48 Wellesley Manor	6/6/2022
DAVID McULIVAN	37 Wellesley Manor	06/06/2022
Eugene Phipps	38 Wellesley Manor	6/6/1957
Robert Bourke	40 Wellesley Manor	7/6/2022
TAM ROONISY	15 WELLESLEY MANOR	13/6/22
Patricia O Toole	10 Wellesley Manor	14/6/22
Thomas O Toole	10 Wellesley Manor	14/6/22

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Name	Address	Date
Panagiotis Anton	65 Wellesley Manor	31-5-2022
STEPHEN COOPER	65 Wellesley Manor	31-5-2022
Seamus ASPOLL	63 Wellesley Manor	31/5/2022
Annette Ginty	62 Wellesley Manor	01/06/2022
Patrick Forbes	64	01/06/2022
Eddie Sullivan.	61	01/06/2022
Sharon Brady	60	01/06/2022
WILLIAM	59 WILLIAM	31/5/2022
Bridi Fitzpatrick	58	31/5/2022
David Lane	58 Wellesley Manor	31/5/2022
Jennifer Donohoe	57 Wellesley Manor	31/5/2022
Anne BARRETT.	56 wellesley manor	31/5/2022
Colin Bennett	56 wellesley manor	31/5/2022
Mark Neville	55. Wellesley Manor	31.5.22
MAIE NEVILLE	" " "	31.5.22

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Name	Address	Date
Francis Fortune	54 Wellesley Manor	31-may 2022
Mags Saundler	75 Wellesley Manor	1-June-2022
John Saundlers	75 Wellesley Manor	1-6-2022
Paul Brady	60, Wellesley Manor	1-6-2022
	53	
KAREN <sup>Karen Flaherty</sup> FLAHERTY	52 Wellesley Manor	1-6-2022
A.L. Flaherty	52 Wellesley Manor	1/6/2022
Valerie White	45 Wellesley Manor	15/6/2022
Ngesh Koorstra	70 Wellesley Manor	15/6/2022
Alice Kinsells	72 Wellesley Manor	15/6/2022
EAMONN DOHERTY	76 wellesley MANOR	15/6/2022
Dianne Collins	78. Wellesley Manor	15/6/2022
Craig Collins	78. Wellesley Manor	15/6/2022
Janet Corry	79 Wellesley Manor	15/6/2022
Clodagh Corry	79 wellesley Manor	15/6/2022

