

20/06/2022

An Board Pleanála,  
64 Marlborough Street,  
Dublin 1

Re: Great Connell SHD: ABP Reference: 313306.

(Also referenced as ABP-311390-21 in the Applicant's cover letter)

Observation of Perry and Kate Whitworth, of 81 Wellesley Manor, Newbridge, Co. Kildare.

Dear Sir/Madam,

Please see attached an observation submission which we would appreciate if you can take these points into consideration when making a decision on the planning application. Our home is directly behind the back wall where phase 1 of the 4 storey apartments are proposed to be built, so we will be directly impacted throughout the build and afterwards, we purchased our home to be our forever home but fear we may need to move if this planning goes ahead. With the housing crisis as it stands our home being sold would not purchase a similar home elsewhere unless we moved central Ireland, which is not feasible for us personally. This application has impacted us already spending time looking at our options if any.

Newbridge currently does not have the infrastructure and in particular this area for a build as large as this. The school places are limited with 150 students in the catchment area refused places in 2020 due to increase in population.

There is no public transport to this side of town.

Newbridge has the lowest ratio of Gardaí to unit rate in Ireland with an increasing crime rate along with youth and drug issues that need addressing before more units are added to the town.

The land in which they are looking to build on I believe is a floodplain and environmentally affect the river Liffey and surrounding buildings when the earth is disturbed.

We note and see the need for development with our community however it needs to be fit for purpose so the above issues and more are not exasperated now or in the future.

Thank you in advance.

**(1) Scope affect adjacent land significantly:**

Item 10 notes::

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

We request An Board 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. 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 25th. 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 Bord to the following application drawings:

PA-003\_PROPOSED SITE LAYOUT PLAN-SHEET 1

PA-023\_PROPOSED SITE SECTION AND CONTIGUOUS ELEVATIONS N-N, 0-0, 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 for 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 Board to consider whether the application can be considered valid in such circumstances.

**{S) 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.

**(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.

Thank you in advance for reviewing this in detail.

Sincerely

Kate & Perry Whitworth,

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