

*LRD40 to issue to observer.
- Attach to file.

DCS
LDG-088222-26



An
Coimisiún
Pleanála

Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006512

ld: 08/06/26

Online Observation Details

Contact Name
Gwenda McInerney

Lodgement Date
27/05/2026 07:20:36

Case Number / Description
324275

Payment Details

Payment Method
Online Payment

Cardholder Name
Evin Power

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3TbapUB1CW0EN5FC08SQYmkS

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

LRDAO issued
04/06/2026
I.K.

The Secretary,
An Comisiún Pleanála,
64 Marlborough Street,
Dublin 1, D01 V902

27th of May, 2026

Subject: Observation regarding Third Party appeal in respect of Dublin City Council
WEBLRD6093/26-S3B development proposal at Milltown Park, Ranelagh

A Chara,

My name is Gwenda McInerney, I am resident at No.1 Upper Cherryfield Avenue. I write to you in respect of the above described LRD planning application to Dublin City Council.

Noting Dublin City Council's recent decision to grant permission for the proposed development, and noting that the application is now subject to a third party appeal, I now wish to lodge an observation based on the grounds contained in this cover letter, my original observation in regard to this application, and the previous observations which I have made in respect of the applicant's other planning applications on this site to date.

I strongly ask that An Comisiún Pleanála take cognisance of my efforts, and the efforts of other residents in the immediate vicinity to have our voices heard in respect of this site, as it has been very clear to date that neither the applicant, Dublin City Council, or An Bord Pleanála have given our concerns regarding this development sufficient and appropriate consideration. Irrespective of what the position of Dublin City Council is, we the residents will be left with this development in perpetuity, and as such we demand that it should be not injurious or disruptive to our enjoyment of our property.

Omission of Block E

It is infuriating to note that the planning officer has stated in their report that Block E does not affect the residents of Upper Cherryfield Avenue, only Lower Cherryfield Avenue. Having lived in Upper Cherryfield Avenue for more than 40 years, I can very

much confirm that my home is definitely in Upper Cherryfield Avenue and is directly to the North of the proposed Block E. As a named third-party appellant of the most recent SHD application on this site which has been referred to the board, one would imagine that increased consideration would have been given to my home as part of any revised proposals for this site. In actuality, it appears that the Planning officer has chosen to do the exact opposite and just chosen to ignore my home.

Block E is, and always has been, a problematic proposal in the various revisions of this scheme. The current proposal is clearly a strained response by the architects to respond to pressure from the applicant to at least get some sort of development on this piece of land. The six proposed two-storey houses are equally problematic as the previous rendition. They are cheap looking, squat, stumpy and very poorly rendered from an architectural perspective. They are reminiscent of defensive bunkers as opposed to homes, and are no more in keeping with local character than a bunker would be, which is to say, not at all.

As before, I would have no issue with the provision of this same quantity and size of dwellings where development is actually appropriate on this site, i.e. as an addition to the main block facing towards Milltown road. However, it seems that no matter what rendition of development the applicant decides to submit in the Block E area of the site, it will inevitably lead to a problematic and poor offering that we, as permanent residents of the area, will be forced to suffer.

I would further note that the planning officer has stated that Block E is c. 30 meters away from the Cherryfield avenue houses. Again, this is wholly inaccurate as my rear bedroom window is well within this distance.

I ask that should An Comisiún decide to grant permission for this development, that Block E be conditioned out entirely, or at the very least 6 additional family apartments are provided within the main, larger block along Milltown road and the existing Block E lands remain as external space.

Build to Sell

In my initial observation I noted that the 'Build-to-sell' description of this development be clarified. This was to seek clarity that the entirety of the proposed dwellings, when completed, would actually be offered for sale to private individuals. I note from review of the planners report that this issue was not amongst the list of concerns taken under consideration during formation of their opinion. I cannot think of a more pertinent clarification in the context of assisting younger generations in gaining home ownership. It is my expectation that the applicant's definition of 'Build-to-Sell', actually means sale of some or all the development to institutions or real estate businesses, and not in fact to citizens who are in significant need of private home ownership.

I ask that should An Comisiún decide to grant permission for this development, that a covenant or condition be placed on the proposed development which directs the applicant to sell these individual dwellings on the open market to private individuals, as the description 'Build-to-sell' is intended to mean. Alternatively, if the applicant's intention is anything other than as described above, then it is incumbent on An Comisiún Pleanála to reject this application as being wholly untruthful, as these will really only ever be rented accommodation.

Car Parking

In my submitted observation to Dublin City Council, I noted my concerns regarding Car parking and in particular the provision of EV charging stations in enclosed basement areas. Rather than take this under consideration and address it, again the planning officer chose to ignore this concern in forming their decision to grant permission.

In addition to this, we would note that the move towards provision of substantially reduced Car parking for large residential developments has recently been highlighted in the media as causing significant discord in areas where they have been completed. Residents of these new developments who need private vehicles are forced to park in existing adjacent estates and streets which were in no way designed to accommodate this increased and unplanned capacity.

Through allowing such reduced parking numbers on the site of the proposed Milltown park development, it is an inevitable conclusion that additional car parking pressures will be placed on adjacent established residential areas, which as can be imagined are wholly unacceptable to us. It is a major foreseeable problem for the applicant to suggest that *'permits would be allocated on a 'needs basis'...'with no guarantee of access to the on-site residents car parking provision'*. At best this is clearly wishful thinking that it will all work out fine, at worst it is wilful negligence.

Provision of such reduced car parking quanta as proposed by the applicant could only ever be successful where there is a surfeit of public transport options, which would nullify the practical need to own a car. As it stands the provision of public transport in by bus only and is at capacity, and the routes directly serving the application site are limited in their direction and frequency. How do parents take their children to schools or events which are not along the bus routes adjacent to the site? How would an elderly person get to the nearest hospital for an appointment from this site using public transport? The answer, obviously, in both of these common scenarios is that these people will need cars.

Further I would note that if a practically appropriate quantum of car parking were to be proposed as part of this application, it would very likely make the submitted traffic and transport assessment for the development wholly untenable, with a likely significant adverse impact on traffic movements at peak times.

In essence, it is plain to see that the proposed development is going to cause a car parking and transport problem, either on the site itself or in adjacent neighbourhoods, a fact which fully undermines the scale of development proposed on this site.

Yet, our observations in this regard across the multiple planning applications for this site, have been ignored.

Loss of habitat and biodiversity

Again, as we noted in our most recent and previous submissions regarding this site, the proposed wholesale demolition of trees, habitats and grassland required by the applicant is incredibly heavy handed and far too expansive. Close to 70% of existing trees on site are proposed to be cut down, and all the existing habitats on site will be either removed or manipulated in some fashion. All the grassland in the main area of the site, which in itself is both an important carbon sink as well as a source of biodiversity, is to be dug up and removed.

We note that in their submission the applicant has stated that only trees of 'high quality' would be retained on site. This is wholly ignorant of the fact that all of the other trees and scrubland on the application site undeniably play a vital part in maintaining biodiversity there. Whether or not they look pretty, these trees and plants form a very large part of the ecology of the Ranelagh/Milltown area. The applicant has opted for wholesale and aggressive destruction of these established habitats, and it appears that the planning department are comfortable with this and fully supportive of such an approach. This is totally aside from any consideration for the local residents during the construction, considering that whatever wildlife (Rats, mice, foxes etc.) currently resides in the milltown park site, will need to move elsewhere, i.e. onto our properties.

My full opposition to this feature of the proposed development is supported by both the Parks Division in Dublin City Council, as well as the Conservation Officer, both of whom have voiced strong opposition to the destruction of all of this habitat.

We would also query the blanket statement by the applicants landscape architect that this whole sale destruction of habitat will '*have a greater long term benefit to local ecology and biodiversity.*' How can this possibly be correct when there will be a vast and permanent reduction in habitat in favour of buildings and hardscape as a result of this development. This statement simply cannot be true by virtue of the fact that the overwhelming majority of the site that will not be able to support any form of wildlife once this development is constructed. Whatever plants and hedges being proposed for installation would need to outperform the existing, established ecosystem multiple times, but on a hugely reduced portion of the site. This appears to be a blithe and wholly unfounded statement.

However, and yet again, in forming their opinion to grant permission for this development, the planning officer has chosen to ignore these facts.

Planning process to date

As a generality, I must note that the planning application process pursued by the applicant since this scheme was first proposed, has been shambolic.

Those of us who live in the immediate vicinity of the application site are generally not geared towards continually reviewing planning applications, and particularly the swathe of material that is submitted each time an application is lodged for this site. To date two schemes on this site have been referred for judicial review (DCC reg/ref LRD6026/23-S3, and DCC Reg/ref SHD0019/21), and the latter referred back to ABP/ACP. In addition, two invalidated applications were submitted in December and January of 2025/2026. In total, we have been required to review documents six times on this site in the last 5 years, each time we have written to the statutory bodies involved to clearly outline our concerns regarding this scheme.

It is apparent that the applicant's intent is to shove this scheme or some rendition of it through the planning process, with the apparent complicity of the local authority. As a former and current appellant on this scheme I can verify that my views, and those of other local residents have not satisfactorily been taken on board to date, and on this most recent occasion, barely given lip service.

We also note that, as part of our observation lodged with DCC in respect of this current application, we requested copies of the minutes of the LRD meetings that were held in advance of the eventual submission of this application. It is a requirement of the LRD amendment to the act that minutes of these meetings be kept, and I wanted to ensure that my concerns, and those concerns of my neighbours, were being satisfactorily address.

Yet again, we have been ignored by the Local Authority in this regard.

Judicial review

I also question Dublin City Councils decision to accept any further planning applications on this site, noting that an almost identical scheme is currently under judicial review, and a broadly similar scheme is awaiting a decision from ABP/ACP. If a fundamental tenet of these schemes, such as the wholesale demolition of the ecology of the site, were to give rise to be application being struck down or refused, where would that leave this planning application were it granted?

The situation would appear to be somewhat uncontrolled, and lacking in any kind of logic or respect of process.

It is for these reasons that my frustration has been mounting over the years in respect to this development, and a large causative reason for my frustration has been the total lack of willingness of the Applicant to engage with the local residents in a dialogue.

Between this considered lack of engagement, and the Local Authorities sustained lack of interest in satisfactorily addressing our concerns, I am forced, again, to appeal to An Comisiún Pleanála to overturn Dublin City Council's decision on this matter.

Yours Sincerely,

Gwenda McInerney