

* LRD40 to issue to Observer ✓
issued 5/6/26
A.D

Laura
LDG-088292-26



An
Coimisiún
Pleanála

Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006514

did obs: 08/06/26

Online Observation Details

Contact Name
Mary Lane

Lodgement Date
03/06/2026 22:37:30

Case Number / Description
324275

Payment Details

Payment Method
Online Payment

Cardholder Name
Mary Lane

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_3TeMTeB1CW0EN5FC1JOc5JEv

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



Application reference number: WEBLRD6093/26-S3B

Please see below my observations on valid appeal/s to An Coimisiun Pleanala against the decision of Dublin City Council to grant planning permission for a proposed LRD at Milltown Park, Dublin 6.

It should be noted that this is my fifth time making observations on largely similar proposed large scale developments on the site - to both the City Council and An Bord Pleanala (as it was then known) - and the lack of any apparent acceptance or acknowledgement in decisions reached of the issues raised has been disappointing.

The reasons that I previously gave for objecting to the proposed development are still of relevance to the current development and include the following:

- Loss of privacy - the excessive scale and design of the proposed apartment blocks in the vicinity of Norwood Park would present vast walls of fenestration facing the back of our house and would be in very close proximity. This fenestration, and the excessive height proposed, maximises the potential for the development to overlook our house, resulting in a significant loss of privacy for us. The proposed development would be extremely intrusive in the most frequented parts of our house - i.e. the kitchen, dining room, two back bedrooms (in constant use), and in the main bathroom. All of these rooms would be facing out directly on the proposed 5 and 8 storey blocks and other blocks and roof gardens and would be overlooked as would our back garden
- The privacy at the back of 3 Norwood Park, not being overlooked and the beautiful sylvan setting with mature trees, were very important factors when deciding to buy our house in Norwood Park - these factors still apply today. The proposed development has, and will have, an impact on the price of property in Norwood Park before, during and after construction. The beautiful, peaceful and private

setting will be replaced by a concrete jungle - destroying the amenity of the Norwood Park area.

- The visual impact of the proposed very high buildings, which would be very close to our residence, are totally out of character with other buildings in the vicinity and exceed the height of other buildings in the area.
- Loss of light and overshadowing.
- Increase in traffic for all living in, and travelling through, Ranelagh, resulting in a significant increase in congestion in an already congested village (not helped by the recent new traffic management measures implemented by the City Council in Ranelagh), thereby ruining its appeal as, inter alia, a nice place in which to live, visit, shop and dine.
- Insufficient public transport to support a development of the scale proposed. It should be noted that the 2 buses that serve the area (i.e. the 11 and 44) are very unreliable and infrequent and are inadequate at present. The Luas, which is some 15 minutes walk from the proposed development, is regularly full at peak and other times. The proposed development would place further strain on these modes of transport.
- Traffic hazard magnified due to the proposed huge number of apartments. This will be of particular concern for children going to the many nearby schools and for the elderly.
- Very significant increase in traffic fumes locally from the proposed large number of apartments/additional cars arising from the proposed development - thereby causing health concerns.
- The loss of a large number of established trees, plants and green space.
- Noise and disturbance during construction. Also, following construction due to the large number of residents and vehicles on the site.
- Due to the likely temporary nature of residents in the proposed development, because of the proposed size of units and lack of adequate green spaces, inadequate childcare facilities (both on site and in the area generally), lack of reliable close public transport etc.,

it is unlikely that the majority of occupiers would have any long term interest in the area. Also, the development allows extremely limited flexibility for changing households or for families.

- In addition to impacts in terms of overlooking or overshadowing, the proposed development would radically change the backdrop of the small mature development of Norwood Park - from the current natural environment with tall trees to a new backdrop of up to an 8 storey high block in parts, at a close distance from the rear boundary of our gardens. It would do nothing positive to the streetscape of Norwood Park nor would it enhance the public realm of the area as seen from the proposed development - in fact, the opposite would be the case - it would detract from the visual amenity of Norwood Park as a result of building height and proximity to the site boundaries. It shows no sensitivity or consideration for the established residential area.
- Environmental and amenity impacts - we have been living in Norwood Park for over 30 years. Over this period of time (until the change of ownership of the site), the grounds of Milltown Park were made available to the local community for various recreational purposes - e.g. for walks and cycling, as a space for children to play in and for sporting purposes. However, since the change of ownership the "gates have been closed" and what had been a very valuable recreational space has no longer been available to the community. If the proposed development were to proceed the site would go from being a green space, which was used by members of the public for recreational purposes, to an extremely high density visually intrusive site.

The proposed development is entirely inappropriate for the site in question in terms of height, density and potential for anti-social behaviour in an area that has been a quiet, safe residential area, and it will completely change the character of the area. The proposed development should not be allowed to proceed as it would destroy the character of this area for this and future generations.

In previous observations to an Bord Pleanála (as it was then known), I provided some photos showing the view from various rooms from the back of our property (3 Norwood Park) looking out on to the site of the proposed development - these showed how obtrusive the proposed development would be, leading to a complete lack of privacy, particularly in the Winter when trees are bare. There is also a gap in the trees at the back of our property which would mean that there would be absolutely no screening whatsoever from the 8 storey block at that location.

In addition to the above, I also submit the following observations:

Regarding the proposed development, on any measure, it has to be seen as overdevelopment of the site. With 562 dwellings proposed, and taking the site area of 4.26 hectares, as indicated in the site notice of 25 February, 2026, the dwelling density can be calculated as 132 dwellings per hectare. This figure is significantly in excess of the upper value in the range (60 to 120) indicated in the Dublin City Development Plan for outer suburb areas (outside of the canals).

It is this excessive dwelling density that leads to overdevelopment of the site - especially to the west and north of the site - with disproportionate scale, height, length and bulk of buildings on site. If the proposal were to adopt a dwelling density of, say, 90 dwellings per hectare (mid-range in the Development Plan guidance of 60 to 120), the total number of dwellings on site would be 387, and would allow for a more proportionate development on the site - if, of course, implemented with good quality design and construction. I consider that a number of 2, or possibly 3 storey houses (again of good quality design and construction) would be far more suitable, than the proposed soviet style development, for the site in question in terms of, inter alia, visual impact and sustainability for the future.

Residents in Dublin City rely on the City Council to have regard to its own Development Plan, and to protect against excessive proposals. I note that in volume 2, page 215, of the Plan's appendices, there is very definite text in this regard:

“There should be a focus not just on maximising density to maximise yield. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future residential amenity.”

Table 3 in volume 2 of the Plan sets out criteria where higher density proposals are made outside of the canals, including:

- transition in scale to boundaries in an established area,
- no monolithic construction ... avoiding long slab blocks,
- inclusion of a mix of building and dwelling typologies, and a range of housing typologies.

Looking at the elevations shown in drawings nos.

19037C-OMP-01-ZZ-DR-A-2000 and 19037C-OMP-01-ZZ-DR-A-3000, one could be forgiven for imagining that the proposal's designers had never read the Development Plan, or the guidance it offers in this regard.

Turning to the proposal's effects on existing residences in adjacent Norwood Park, examination of the drawings provided by the applicant suggests the outlook from these homes would be towards a development notably overbearing and overly massive. Again, the elevations shown in drawings nos. 19037C-OMP-01-ZZ-DR-A-2000 and 19037C-OMP-01-ZZ-DR-A-3000 present an appalling vista in this regard.

If An Coimisiun Pleanala considers it important that Dublin City Council's development plan has any credibility whatsoever, the proposed development should be rejected.

The provision of low rise houses, as an alternative to massive apartment blocks, as already mentioned above, would be a far more appropriate development.

However, if An Coimisiun Pleanala is considering permitting the proposal, significant changes are required to mitigate its worst features:

- To minimise the monolithic *soviet-style* presentation of the buildings when viewed from Norwood Park, changes should include very significant reductions in the height of buildings on site, along with *tapering* of building heights towards boundaries with existing dwellings in Norwood Park.
- In particular, a reduction in the height of the eight-storey portion of Block A1 should be required - to a maximum of 3 storeys.
- A reduction in the height of the 5 storey portion of Block A1 - to a maximum of 3 storeys.
- Conditions should be included to prohibit vehicular through-traffic from Milltown Road to Sandford Road, via the on-site routes. This could be done by appropriate location bollarding.
- There should be a requirement that balconies on buildings overlooking existing properties in Norwood Park be provided with obscured glass, rather than open balustrades, to help conserve privacy in Norwood Park dwellings.
- Consideration should be given to the roof garden proposed for the five-storey portion of Block A1. This should be removed, to prevent overlooking on properties at nos. 1 to 5 in Norwood Park.
- The proposed bin/bike store north of proposed Block E should be considered. I note that, in regard to a previous proposal for a largely similar development on the site, An Bord Pleanála required this facility to be relocated to the basement of Block B & C - this condition should apply to the current proposal.
- On-site mature woodland and trees adjacent to Milltown Road, Sandford Road and Norwood Park should be conditioned for retention.
- The proposed red colour to the exterior of the 5 storey portion of block A1 is very obtrusive and we, in Number 3 Norwood Park, would be looking out directly at this block, as well as the 8 storey block. I would ask that the 5 and 8 storey blocks in particular, and others, be required to be finished in a less obtrusive colour - e.g. a pale grey or sand colour.
- The proposed drop-off/delivery area, adjacent to the Sandford Road entrance to the site has potential to present nuisance and noise at the

rear of nos. 1 to 4 Norwood Park - with potential late night noise arising in connection with taxi drop offs and deliveries. Relocation of this facility to a suitable area more centrally located in the development would provide an area where residents are more likely to consider their neighbours in the development, and present less potential nuisance.

I would ask that An Coimisiun Pleanala carefully considers this and other observations and appeals on the proposed development. In this regard I fully endorse the points made in the appeal lodged on behalf of the Norwood Park Residents Association. If the current proposal proceeds as it is, it will destroy the area for this and future generations. I urge An Coimisiun Pleanala to refuse permission for the proposed development.

Mary Lane
3 Norwood Park
Ranelagh
Dublin 6

3 June, 2026
