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Ballyboden Tidy Towns  
c/o Angela O'Donoghue  
17, Glendoher Close  
Rathfarnham  
Dublin 16

Date: 22-Mar-2022

Dear Sir/Madam,

**Register Ref:** SD22A/0039

**Development:** (a) The demolition of two existing habitable structures on site including a bungalow (Silveracre), an existing cottage (No. 6 Whitechurch Road) and a row of 5 derelict structures/cottages located along the western boundary of the site (extent of proposed demolition is 433sq.m) (b) the construction of 22 4 bed, 3-4 storey units ranging in size from 197sq.m to 214sq.m, all with associated private balcony/terrace areas. Vehicular and pedestrian access is proposed via new entrance on Whitechurch Road. The proposed development shall provide for 44 car parking spaces, a new single storey bicycle storage shed (approx 34sq.m) and provision of bin storage to be provided at the front curtilage of the dwelling for all terraced units, all boundary treatment, all site services and all associated site works.

**Location:** Silveracre Bungalow, Whitechurch Road, Rathfarnham, Dublin 14.

**Applicant:** Dungrey Limited

**Application Type:** Permission

**Date Rec'd:** 10-Feb-2022

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanála if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, [www.sdblincoco.ie](http://www.sdblincoco.ie).

You may wish to avail of the Planning Departments email notification system on our website. When in the **Planning Applications** part of the Council website, [www.sdblincoco.ie](http://www.sdblincoco.ie), and when viewing an application on which a decision has not been made, you can input your email address into the box named "**Notify me of changes**" and click on "**Subscribe**". You should automatically receive an email notification when the decision is made. Please ensure that you submit a valid email address.

**Please note:** If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full contents of a planning application.

Yours faithfully,

*M. Crowley*

for Senior Planner  
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The Manager

SDCC,

County Hall

Tallaght

Dublin 24

15th March 2022

Reg.Ref: SD22a/0039

Applicant: Dungrey

Location: Silveracre Bungalow, Whitechurch Road

Proposed Development: 2 new dwellings; entrances and all associated site works to the rear.

Dear Sir or Madam,

We wish to object to the application for the following reasons:

- It is contrary to the SDCC Development Plan its policies and objectives.
- It is contrary to Sustainable Development and principles of proper planning
- The site represents an opportunity to create long overdue **permeability** between the communities of Tara Hill. We believe that there should be pedestrian and cycling permeability that will connect new residents with Grange Road via Tara Hill and conversely Tara Hill residents will find increased residential amenity being able to cut through to Rathfarnham Village via this site on Whitechurch Road. This would allow this site (the new residents to have access to more public transport options.
- There is a need to rehabilitate areas to be able to achieve a 15minute access to amenities be it shops, public transport, schools and parks etc
- The river Glin bounds this site and we believe that the Landscaping Plan fails to connect and integrate this river into proposal in line with SDCC policies and sustainable development. We believe that there should be a connection between this site's green space and the existing green space at Tara Hill. This would allow a playspace on the new development and a kickabout space in Tara Hill to coalesce on either side of the Watercourse – using a simple bridge.

- We are concerned about the impact this development will have on the otter population at this location – there is no survey included by the Applicant. The Owendoher and Glin as per the DCC Otter Survey 2019 have known otter populations (high activity) and recent surveys by SDCC have also indicated increased otter activity on the Glin River.
- We also know that this area, has a large bat population and we are concerned about the impact this development will have on bat flying paths and nesting – the survey is inadequate etc
- There is a family of badgers that live at this location and residents have reported sightings along this ecological corridor – there is no survey.
- This development is contrary to the Water Framework Directive
- We believe that this development is contrary to the EU Habitats Directive. This watercourse is hydrologically connected to a Natura 2000 site.
- This watercourse connects the Glin to the ponds in Rathfarnham Castle and onto the Dodder and serves a number of millraces in the area. This is unique in its built and natural heritage function and the contribution it makes to the character of the area.
- The ‘cumulative effects’ of the other development that about this watercourse further upstream have not been taken into account in respect of this development.
- This development we believe is contrary to the EIA Directive.
- The construction plan for this development has not been submitted.
- We believe that these residential units will be at risk of flooding and will pose a threat of flooding to nearby houses and further downstream according to the Whitechurch FAS scheme documentation. Every effort should be made to create natural solutions to prevent such flooding downstream at the corner of Nutgrove Avenue and Grange Road. This site is a natural floodplain for this watercourse.
- The poor design, height, density and massing of these units is out of character with the pattern of development in the area. A more sympathetic design and a reduction in density would address this.
- Of particular concern is the proximity to the perimeter of the new build houses to the perimeter with Whitechurch Road and the setting and character of the Millhouse and the nearby ACAs of St Patrick’s Cottages.
- The massing of the buildings along Whitechurch Road should be avoided as it disrupts the existing character of the road and the significance of the ACA and nearby the Millhouse
- It is disappointing that some of the last remaining cottages including one habitable one could not have been incorporated into the proposal. We have painted these cottages with the permission of the previous owner and they act as a placemaking signifier in an age greater urban blandness.
- We believe that that the habitable cottage that faces onto Whitechurch Road should be retained as part of any proposed development and that the boundary treatment could easily be adopted to retain and with some imagination incorporate their past significance to a new future. Demolishing a boundary wall just for the sake of it is not a sustainable practice especially when the character of the historical Whitechurch Road as a rural road is a planning objective. The workers of the Mills including Silveracre lived in these cottages. SDCC took an imaginative approach with Bolton Hall with all its outbuildings etc and it would be welcomed if such an approach could be incorporated here.
- The repositioning of the entrance is unnecessary and will cause unnecessary demolition of existing village signifiers.
- We believe that nearby houses will be overshadowed and overlooked

- The Traffic report is inadequate
- The dwelling mix appears to be restricted to 4 bedroom units in an area where older residents want to downsize – this is not sustainable.
- The provision and quality of the open space for recreational purposes is inadequate
- Quite concerned regarding the installation of an attenuation tank and this could be avoided and certainly the incorporation of it as part of the play area is unacceptable.
- The boundary treatment is exceptionally poor and unsympathetic

Please see attached receipt of payment for 20 euros which we note is contrary to EU Law.

Kind regards

Angela O'Donoghue

Chairperson

[ballybodentgroup@gmail.com](mailto:ballybodentgroup@gmail.com)

Address for correspondence:

17 Glendoher Close, Rathfarnham, Dublin 16