

20220421-ABP-SHD-313059

An Bord Pleanála
Strategic Housing Unit
64 Marlborough Street
Dublin 1

Sent by email to: strategichousing@pleanala.ie

21st April 2022

ABP Ref: 313059
For: 178 no. residential units (72 no. houses, 106 no. apartments)
Site: Lands at Kilmashouge House and Coill Avon House, Whitechurch Road, Rotherfarham, Dublin 16

Dear Sir/Madam,

Further to the letter of 21st March 2022 from Simon Clear and Associates sending us details of the above application we wish to make the following submission to you. No fee is payable for this submission on behalf of An Taisce.

1/ Traffic: The infrastructure for traffic in this part of South Dublin South of Rathfarnham and on into the city is already grossly inadequate to take the current levels of traffic particularly at rush hour. However, the Transportation Assessment Report in its Conclusions at Clauses 7.4 and 7.5 on Page 49 states that the proposed development will have an unnoticeable impact upon the established and future local traffic condition and can be accommodated on the road network and that there have been very few accidents on Whitechurch Road (clause 2.15 on Page 13). However, there have been very few accidents because traffic has to go so carefully due to the bad bends and the traffic bumps on the road. The fact is that the traffic will increase significantly when the adjoining Sports Centre and the Rugby Club on Tibbradden Road, both currently under construction, come on stream not to mention this development, has not been taken into consideration.

The position will not be any better if and when the remainder of the Edmondstown zoned lands are developed and a road put through to the Edmondstown Road because the latter road has equally difficult bends.

The stretch of Whitechurch Road from Taylors Lane to the roundabout at the end of Whitechurch Green is currently too narrow for the few busses that use that stretch. There is a high wall at one side and busses have to travel over the white line. There is only just room for them to pass cars and there are no bad bends on this stretch as there are further up the road. The road is not capable of taking busses up to the development.

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Both Whitechurch Road and Edmondstown Road discharge onto either end of Taylors Lane and from here the roads continue and join together at Wilbrook Road into Rathfarnham. These relatively narrow roads are already grossly overcrowded and the position will be exacerbated even further when current and future SHD's come on stream i.e. Scholarstown Road SHD Ref. 305878 for 590 units (currently under construction), Taylors Lane Ref. 307222 - ABP's grant overturned by the Court but could be re-proposed, White Pines East 309836 241 units, White Pines Central 310398 114 units, Ballycullen Ref. 310578 for 329 units, Stocking Lane Ref. 311616 for 131 units (these four all granted by ABP but all are now under review) and the subject application (178 units i.e. total approx. 1,830 units). There is also the future development at Edmondstown/Whitechurch mentioned in this application. When all these developments come on stream Taylors Lane and beyond into the City may be completely blocked. The transport infrastructure is inadequate. We refer to the judgment of Mr. Justice Holland in Ballyboden Tidy Towns Group v. An Bord Pleanala & Ors. (2022) IEHC (10 January 2022) which overturned the decision of the Board on the Taylors Lane application (noted above).

2/ Density: The density for this application is 41 dwellings per Ha. This is far in excess of the density in the Specific Local Objective (H3SLO1) of the 2016-2022 Development Plan for these lands which is 12 units per Ha. which is more appropriate for this area in the foothills of the Dublin Mountains.

3/ Building Height: SPPR 3 of the Height Guidelines states that where a Planning Authority is satisfied that a development complies with the criteria under Section 3.2 of the Guidelines then a development may be approved. However, Section 3.2 states:

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.

We consider that the proposed four and five storey apartment blocks do not comply with these criteria as they are completely out of character in this area in the foothills of the Dublin Mountains.

We respectfully submit that this application is premature until the infrastructure is improved.

Yours faithfully,

Patrick Leonard on behalf of

An Taisce South Dublin Local Association Planning Committee

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