

An Bord Pleanála
64 Marlborough Street
Dublin 1
Via ABP Online Observations Portal:

06 October 2021

Submission to An Bord Pleanála

Development: Frankfort Castle SHD, Dundrum Road, Dublin 14.

Planning Authority: Dun Laoghaire Rathdown Co. Co.

An Bord Pleanála Opinion No: 306159

An Bord Pleanála Case No: 311287

Dear Sir / Madam

We are the Residents Association adjacent to the proposed development referenced above which is situated just to the north and connected with pedestrian and single vehicle driveway links to the subject site. Several of our members' rear gardens adjoin the subject site directly.

We are aware that those directly affected members have formed a group who have made a separate Submission outlining concerns from that highly impacted group. We wish to outline concerns impacting our members and the wider area. Accordingly we are an interested body that will be affected by the proposed development.

We submit that this development is of poor quality and should be refused permission. Our reasons are as follows:

1. The separation distance from Block C to the existing dwellings in Highfield Park is substandard, with only 5-7metres to the boundary and less than 25m to the existing dwellings. This separation should be 35 metres at least when 3-storey buildings are proposed (Council Development Plan Standard). This is proven by the convoluted design mechanism of Block C where windows are omitted facing Highfield Park and this results in a blank façade and substandard design.
2. The Applicant's proposals erroneously state the density of the proposed development as being 128 units per hectare. However, in arriving at this figure the applicant has included public lands within the area of its proposed development. If public roads and external spaces are excluded, the actual density of the proposed development is 144 dwellings per hectare. This density level is far in excess of reasonable target for sustainable residential development for urban areas of up to 70 units per hectare. We are of the view this is further example of the clear overdevelopment being proposed for this site. The scale, size and density of the proposed development will be overbearing and have a significant negative impact on the existing residential amenity of local residents.
3. There is a complete lack of amenity open space. The design layout is essentially an inner estate ring road with notional graphic planting shown on the minimal perimeters. This scale of open/green space is unrealistic and is not amenity in any sense. There is no respect for existing tree cover and local bio diversity of the existing site coupled with an over-reliance on the existing trees and vegetation of neighbours on Highfield Park for privacy.

4. There is a lack of permeability or open access. By virtue of the layout this is an enclosed future community. This is out of sync with the focus on integration that would be anticipated with all modern design layouts.
5. The small network of lanes servicing the Old Frankfort area and the site are not conducive to supporting high density development. The introduction of a one-way system on the existing lane at the bridge leading to Dundrum Road (which is not in the ownership of the applicant) is symptomatic of convoluted design solutions required to justify the proposed scale of development and is indicative of over-development.
6. The information submitted by the Applicant in relation to overshadowing should clarify the nature of overdevelopment – excessive shadows are cast on both the gardens of Highfield Park and especially within the subject site itself. We also highlight and echo the concerns over the validity of the Developer's sunlight, daylight, overshadowing and overlooking studies raised by our members, whose rear gardens adjoin the subject site directly and who have made a separate submission outlining this concern in detail.
7. While we recognise the broad move toward reduced reliance on private car ownership, we highlight the inclusion of a total of 73 resident and 4 disabled car parking spaces in a development of 115 apartments that will likely house well over 300 residents. We would suggest there is a very high likelihood of significant overflow parking impacting Highfield Park residents, during both construction and into the future when the development is populated.
8. We highlight that the Developer includes no traffic impact assessment on the junction of Highfield Park and Dundrum Road, which is already a difficult and dangerous junction due to poor sight lines and busy traffic patterns on Dundrum Road. The existing condition at the junction will be impacted by the proposed development through increased vehicles from overflow parking as well as increased pedestrian and cycle traffic utilising Highfield Park as a through route from the proposed development. We raise this concern recognising the traffic and safety pressures at this junction are likely to increase with inclusion of major developments planned along Dundrum Road including by the Land Development Agency on the Dundrum Mental Hospital site whose entrance is proposed as being across the road from this junction.
9. We question the capacity of the local road and public transport networks to facilitate the cumulative impacts of proposed and planned significant developments along Dundrum Road including this proposal, Dundrum Central and others. We have noted no effort from the Applicant to submit a study of the cumulative impacts on local transport capacity.
10. We request that any opinion from the Bord be unequivocal in stating construction traffic should not be directed through Highfield Park which is a low-speed residential road with children and residents frequently occupying the road space.

Summary

We are fully aware that submissions against current SHD applications are often accused of 'NIMBYism'. This is not an objection to any development on the Frankfort Castle site, nor an objection to the urgent needs in addressing the housing crisis. This Association has already engaged very constructively with the Land Development Agency and local politicians in relation to the Dundrum Central site. It is the substandard and excessive nature of the current application, which should be apparent in any rational evaluation, which is our cause for significant concern. We respectfully request that you exercise your powers judiciously with full regard to the inferior nature of the proposals and their complete disregard for good design and build standards.

Yours faithfully

Kieran O'Grady

Chairperson

For and on behalf of Highfield Park and Westbrook Road Residents Association

7 Westbrook Road
Dundrum,
Dublin 14
D14 RX29

Enclosures

Statutory Fee of €20

