

Councillor Carolyn Moore,  
c/o Richard O'Carroll room,  
City Hall,  
Dublin 2

Dublin City Council Planning Department,  
Civic Offices,  
Wood Quay,  
Dublin 8

**REF: 3372/23 – Redevelopment of Crumlin Shopping Centre**

*Crumlin Road, Dublin 12*

To whom it may concern,

As an elected representative for the Kimmage Rathmines area, I am writing to make my observations on the redevelopment of the Crumlin Shopping Centre by Better Value Unlimited Company. I would like to start by welcoming the redevelopment of this currently very dilapidated building, which has become a blight on the surrounding community and a magnet for anti-social behaviour. I would particularly like to note and commend the commitment demonstrated in the design statement and plans to sustainability and community enhancement – notably through the inclusion of a detailed landscape plan, solar panels, green roof elements and SUDs treatments, along with the provision of ample bicycle parking; and the plans for a community or cultural space, which is currently desperately needed in the area.

The redevelopment of this site long overdue, this plan being, I believe the second such proposal inside of a decade. However it is critical that should the plan be granted permission, Dublin City Council planners must ensure the plan is carried out in such a way as to maximise community benefit, resulting in a local amenity that offers a biodiversity gain to the area, puts sustainability on the map in Crumlin, and achieves the developer's objective of creating a welcoming and attractive space for residents of the area.

To this end I would ask the planners to take the following points into consideration:

**1) Proliferation of fast food restaurants in the Crumlin area.**

The plan proposes an independently accessed food market with seven kitchens (and presumably seven vendors). I welcome the proposal to make this operational from 7am to 11pm, which I think will diversify the area's night time and evening offering, particularly in conjunction with a cultural space. However, there is currently a proliferation of fast food restaurants and the redevelopment of the shopping centre should not be allowed to result in a extreme concentration of only fast food, or less healthy, highly processed food options in the Crumlin area. It would be good to see the inclusion of some own-door entry sit down, family friendly restaurants to diversify the food offering in the area and provide additional amenity value.

**2) Retention of 400 parking spaces.**

The parking proposal for the redeveloped shopping centre is quite simply excessive for an urbanised area. This is not an isolated, unreachable retail park, it is a shopping centre in a key urban village. Per the observation filed by the National Transport Authority and with reference to and due consideration of the Transport Strategy for the Greater Dublin Area 2022-2042, this planning application should support Measure TM14 in that strategy referring to Destination Parking Standards, namely that *“the quantum of parking provided at destinations (non-residential commercial developments) will be significantly reduced at all locations in the Greater Dublin Area.”*

Measure TM18, referring to Parking Management at Retail Centre, further states: *“The NTA will, in conjunction with local authorities, assess the need for the introduction of parking charges at retail developments in order to reduce the impact of car traffic on these locations and their local communities, and will seek the implementation of the outcomes of that assessment.”*

The NTA notes, and I agree, that the proposed provision of 400 car parking spaces, which is significantly in excess of the 114 maximum number permissible under the Dublin City Development Plan, and the absence of a commitment to manage travel behaviour via a parking charging scheme or any other measures aimed at reducing the need for parking at the proposed development, will result in excessive and unnecessary car use.

I support the NTA’s observation that the site of the proposed development is close to the city centre; well served by existing public transport; within walking and cycling distance of a large catchment; and will be served in the future by improved public transport and cycling networks, and as such the proposal for an extensive surface car park providing 286 more spaces than permissible, with the associated impact on development intensity (site coverage and plot ratio), may not be the most efficient use of land in this highly accessible, inner suburban location and **may encourage use of the private car for trips to the proposed development that could be undertaken using other modes.**

I would ask that in assessing this application, Dublin City Council consider the extent to which the proposed development maximises the opportunity afforded the site via its centrality and high levels of accessibility by sustainable transport modes, for a more intensive, less car-oriented development, and the developer could be encouraged to propose a more creative and community oriented use for the additional parking spaces, for example an accessible and sensory children’s play area, further biodiversity enhancement, or an outdoor community space / amphitheater or screening area to compliment and enhance the cultural amenity.

### **3) Biodiversity gain and sustainability**

As stated, I welcome the commitment demonstrated to highlighting sustainability through the provision of a reverse vending machine, solar panels, green roof elements etc, and I know these elements will be welcomed in the Crumlin area. I further welcome the proposal for a mobility hub and car share spaces, along with a well planted car park with tree pits and SUDs.

I believe, however, that to maximise the biodiversity benefit to the local community, the bicycle parking provision must accommodate more than six cargo bikes, and it must also allow for safe, secure storage of other types of mobility aids or sustainable transport modes. Furthermore, I think the shelters for the bike storage could incorporate solar panels and allow for charging of EVs, demonstrating clean, renewable energy in action, and I would like to see the building design

incorporate rain butts in addition to a proposed rain garden to 'close the loop' on two resources in a demonstrable and tangible way.

Additionally, while the landscaping plan doesn't include details of plants, I would like to see a commitment to planting and establishing native hedgerows on the car park periphery, including native species like alder, hazel, crab apple, whitethorn and rowan. This would exponentially increase the biodiversity value of the sort landscaping and create valuable habitat.

Finally, as a suitable development, the new building must also adhere to policy G116 of the Dublin City Development Plan 2022 to 28 and be required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. **All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric** and the planners must insist on this.

#### **4) Community gain**

The design statement for the proposal is clear that the redeveloped Crumlin Shopping Centre will create a space for a range of commercial and community uses, and with a dearth of community or cultural spaces in the area, this is an extremely welcome addition to the retail element. The centre should indeed strive to be 'a major hub for local activity in terms of retail, leisure and community / cultural activities'.

However, the provision of a **library facility** (with flexible exhibition / community / arts and culture multi-function space) in close proximity to the proposed new Crumlin Library has not been agreed with Dublin City Council and will be superfluous to needs once the new library is completed. Dublin City Council planners must ensure the developers follow through on the proposal to include a cultural space; the nature of this space must be decided via public consultation; and the provision of a flexible exhibition / community / arts and culture multi-function space should not be lost when the library element is removed.

#### **5) Swimming / Leisure element.**

Dublin City Council Planners should seek clarity on what future development will occur on the plot outlined in blue and named Swimming / Leisure on 01097959.pdf. This area to the right of the main entrance constitutes over 2400 sq m and in its current dilapidated state it also contributes negatively to the overall run down and derelict appearance of the site as a whole.

Finally, I would ask, as a matter of course, that a robust construction plan is in place to minimise the impact of this redevelopment on the local community, particularly with regard to noise, dust and traffic.

Yours Sincerely,



**Cllr. Carolyn Moore** (Green Party Councillor for Kimmage Rathmines)

