

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: LRD 6004/11-S3

Fortfield Road, Terenure, Dublin 12

To whom it may concern,

As an elected representative for the Kimmage Rathmines area, I am writing to express my serious reservations about the suitability of the Large Scale Residential Development proposal ref: LRD 6004/11-S3 for the lands at Fortfield Road.

My primary concern here is the nature of the development: 100% build-to-let at a density and scale that is wholly unsuitable for this area, with an inadequate provision of quality, accessible and useable public space, on land that would appear to have a significant flood risk attached. Like many elected representatives on Dublin City Council, and indeed many citizens of Dublin, I have grave concerns about the proliferation of REIT-incentivised, profit-driven build-to-let accommodation across the city. I acknowledge that Ireland is in the midst of an unprecedented housing crisis and that Dublin in particular is in dire need of increased supply, however I recognise too that the housing crisis is also one of affordability, and I don't believe that supply alone can alleviate the pressures on the ordinary people who can no longer afford to rent or buy in our city, being overcharged and outbid by exactly the kind of institutional landlord seeking to develop this site.

The level of rents typically charged by these investor funds is quite simply unaffordable to most people, and far from presenting a solution to our housing crisis, this model of housing delivery exploits that crisis for profit, while offering little in the way of return to communities. As a representative of this and other communities experiencing desperate shortages of good quality, life-cycle residential accommodation, including suitable homes for first time buyers and families and options for older people wishing to downsize, I do not view this type of development as fit for purpose when it comes to addressing those shortages while growing and enhancing those communities in a sustainable way. In several respects too it does not comply with either the current Dublin City Development Plan, or the Draft Plan 2022 to 2028.

Like many of the local residents who are alarmed by the potential impacts of this particular proposal on their community, I too want to see new housing delivered for the Terenure area, but I want it to

be fit for purpose; fit for the needs of the wider community; and a best practice example of high density, sustainable development, appropriately supported by sufficient open space, excellent public transport, school places and other essential amenities and services central to the vision of the 15 minute city we are working hard to achieve in Dublin.

Furthermore, I do not believe the Large Scale Residential Development proposal ref: LRD 6004/11-S3 to be in keeping with the spirit of the Z15 zoning of these lands, and I trust in evaluating this proposal our planners will be cognisant of recent detailed discussions around this zoning. At the latest stage of the draft Dublin City Development Plan, the Chief Executive recommended a considered approach to the rezoning of school and institutional grounds, at numerous sites across Dublin, from their current Z15 zoning to a more, by definition, development-friendly Z12. The vast majority (if not all) of these requests from schools and institutions were denied on the grounds that:

- *The Department of Education ... made a submission which generally highlights the challenges to the Department in developing schools in the city and seeks that support from the City Council regarding the protection of school sites and the review of the existing city plan whereby the future community importance of Z15 lands is emphasised.*
- *Having regard to the above, the Chief Executive concludes, it is considered that the subject lands should be protected for future educational and community uses and as such the retention of the Z15 zoning is appropriate.*

While I appreciate that residential development is open for consideration where it meets certain criteria, I do not believe that proposal LRD 6004/11-S3 is the kind of development that warrants an exception to the above rationale, nor do I believe it adequately meets the terms of Z15 zoning in the current development plan.

Additionally, while recent discussions examined the extent to which we should allow build-to-let development, and where, in light of the relevant Ministerial Guidelines, it should be noted that this development – despite claims to the contrary by the developer – does not meet the key criteria in terms of proximity to a major centre of employment or a major transport hub. And with regard to the provision of open space, which, under the terms of the current Dublin City Development Plan, should constitute:

- *25% of the lands for open space and/or community facilities*

there is an equally cynical attempt by the developer to meet this open space provision by including a lakeside area which is merely an appendage to the actual development site. Omitting this significant additional land strip, and the water which appears to be factored into the 'open space' provision, and which together total 19,000 sq m, the only 'open space' provided for in this development is the space between and around the 4 blocks of apartments. The configuration of this collection of open spaces is in direct contravention to the following condition as set out in the Dublin City Development Plan:

- *The 25% public open space shall not be split up, unless site characteristics dictate otherwise, and shall comprise mainly of soft landscaping suitable for recreational and amenity purposes and should contribute to, and create linkages with, the strategic green network.*

To allow such a compromise, and such a blatant circumvention of a key requirement of the City's Development Plan is to make a mockery of that plan, and it should not be permitted, especially as

plans do not offer clarity on whether the inclusion of the lake as open space for this development will extinguish the public right of way here.

I would also like to highlight the underground watercourses indicated on the map below, and the flood risk this poses, particularly with regard to the provision of underground parking, along with what I consider to be an inadequate ecological survey in terms of assessing the potential impact on all wildlife using this site, including the Brent Geese which feed here while wintering in Ireland between the months of October and April.



For all of these reasons, and in the interest of robust planning standards that support sustainable development in our city, in line with our Development Plan objectives, I am grateful that this application has not bypassed our city planners by qualifying for SHD status. I trust our planners will set the right precedent here in terms of our treatment of Large Scale Residential Developments and recognise that this application is wholly unsuitable for the Z15 land at Fortfield Road, and to refuse permission in this instance.

If Dublin City Council's drainage division finds some or all of this site to be suitable for development then it's essential we don't squander the opportunity to secure an outcome that fits the needs of the surrounding community.

Yours sincerely,



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

