

Patrick Costello TD,
Leinster House,
Kildare Street,
Dublin 2

REF: ABP SHD Application No.: ABP-313043-22
Carlisle, Kimmage Road West, Terenure, Dublin 12

To whom it may concern,

— Along with my colleague, Councillor Carolyn Moore, I wish to submit the following observation on Strategic Housing Development Application Number ABP-313043-22 at Carlisle, Kimmage Road West, and highlight the implications we believe this development and the SHD process will have on the sustainable development of the Crumlin and Kimmage area, and the specific detrimental impacts it will have on the lives of local residents.

As elected representatives for Crumlin and Kimmage and the wider constituency of Dublin South Central, we desperately want to see housing delivered for these communities, but we are deeply concerned about the developer-led approach evident in the proposals for this site and how the SHD process is being utilised to deliver maximum return for investors and not the sustainable development of a thriving community.

As outlined in the Planning Report and rationale which accompanies this planning application, the Z1 land off Kimmage Road West is a prime location for sustainable development given it is well serviced by public transport, easily accessible by bike, and within easy reach of retail and other local services. But despite this, by the applicant's own admission, the proposal is grossly in contravention of the Dublin City Development Plan in key areas such as building height, unit mix, and residential density, while only barely meeting the requirements for apartment size, open space and the applicable guidelines for distance from neighbouring properties.

There is also the matter of an application for the Poddle Flood Alleviation Scheme currently awaiting a decision from An Bord Pleanála that may have a bearing on this application which contains significant provision of underground car parking in an area which has been subject to significant flooding over a long period of time.

By the applicant's own admission, the impacts of overlooking and overshadowing on neighbouring two-storey properties have been reduced but not eliminated by alterations to the block height, configuration and massing.

It is mine and my Green Party colleague's position that the SHD process is a flawed mechanism for the delivery of housing. It has not proven to be conducive to the sustainable development of the city; it does not give due consideration to the needs of the communities for which it is proposed; and it does not have any consideration for the Development Plan which is supposed to guide the planning decisions made in the city. Given that the SHD Process is coming to an end, to be replaced imminently by a 'Large-scale Residential Development' process (LRD) which will see the decision-making process returned to Dublin City Council's planners, and asides from any of the other practical considerations with this development, we would encourage An Bord Pleanála to withhold approval for any further SHDs at this time and instead instruct the applicant to submit this application as a Large-scale Residential Development.

We note that the applicant has already made concessions following meetings with An Bord Pleanála and Dublin City Council – the aforementioned alterations include refinement of the design, massing and layout, reducing the length of some blocks and reconfiguring others, provision of open space, removal of roof terraces etc, and we note also that An Bord Pleanála may grant permission for the Strategic Housing Development as proposed, or may grant permission subject to such modifications as it specifies in its decision. We would argue that further concessions can and should be made to ensure the application has greater regard for the Dublin City Development Plan, notably on the following stated objectives:

To seek to ensure that infill development respects and complements the prevailing scale, architectural quality and the degree of uniformity in the surrounding townscape;

To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, i.e. children, people of working age, the elderly, people with disabilities;

To promote social integration and provide for a diverse range of household types, age groups and mix of housing tenures;

To promote sustainable densities... with due consideration for the protection of surrounding residents, households and communities.

In addition, in my role as TD for Dublin South Central I have been contacted by dozens of residents from Park Crescent; Brookfield Green; Kimmage Road West; Captains

Road and Whitehall Road who have asked me to make representations to An Bord Pleanála on their behalf regarding the following specific issues:

- The proposal has not adequately dealt with the removal of natural light from the surrounding properties adjacent at 102 to 180 Captains Road, 22 to 41 Brookfield Green and 25 to 34 Park Crescent.
- The over-development of the site and the minimisation of the distance of developments from the boundaries as proposed results in a lack of amenity and green space in proportion to the development.
- The proposal does not adequately address the issue of traffic management, access and egress through the already dangerous junction of Kimmage Road West and Whitehall Road which has been the site of a fatal crash in recent months. Any grant of permission should include requirements for widened footpaths and segregated cycling infrastructure at the above junction and the road accessing the premises.
- The proposal does not clearly address the impact of an additional 100 cars on traffic at the above-mentioned junction. Residents advise this junction is already a bottle neck and traffic build ups regularly interfere with and delay public transport.
- The proposal has not adequately addressed how the development will impact on local services, particularly as residents advise a shortage of healthcare providers, early learning and childcare providers, school places and public transport capacity already persists.

We do wish to acknowledge the applicant's commitment to achieving a high A2 or A3 BER rating on each apartment, the proposed use of green roofs, a proposal to add solar panels, along with a high proportion of bicycle parking spaces, but we cannot support this application without further improvements on overall sustainability, enhanced compliance with the objectives of the Dublin City Development Plan, and greater cohesion with the surrounding area.

Yours sincerely,

Patrick Costello TD (Green Party TD for Dublin South Central)

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

