

REF: ABP SHD Application No.: ABP-312300-21

Former G4S Property, Herbeton Road, Dublin 12

To whom it may concern,

We the undersigned wish to express serious reservations about the suitability of the above referenced planning application and the implications it will have on the sustainable development of Drimnagh. We acknowledge that Ireland is in the midst of an unprecedented housing crisis and that Dublin in particular is in dire need of increased supply. Recognising that the housing crisis is also one of affordability, we don't believe that supply alone can alleviate the pressures on the ordinary people who can no longer afford to rent in our city. With the rezoning of several parcels of land in Drimnagh, we on Dublin City Council unlocked the potential for the sustainable development of an area. It is a prime location for sustainable development given it is well serviced by public transport, close to the city centre and easily accessible by environmentally-friendly travel options such as cycling and light rail. Despite this potential, what we have seen is not proposals that add value to the community of Drimnagh while at the same time bringing affordable accommodation options on stream. Instead we are presented with a number of SHD applications which will ultimately fail to address the affordability aspect of our housing crisis; which will fail to accommodate families and people who want to make this community their home in the long term; and which fail to take account of the existing deficit of services in the community of Drimnagh.

If evaluated in isolation and approved en masse, these investment- and developer-led SHDs - loaded with studio and one-bed build-to-let apartments – would see us squander an opportunity to use significant areas of land, perfectly located for the sustainable development of affordable, mixed tenure accommodation. Instead, what we will see is the over-saturation of a community with unaffordable studio and one-bed apartments. Neither the residents of Drimnagh nor we, as their Green Party representatives, are against the development of homes in this area. However, in the absence of a masterplan for the area, or a plan to concurrently bring additional community services on stream, we are opposed to unsuitable, unsustainable development.

Furthermore, in evaluating this application, An Bord Pleanála simply must take account of the fact that the Strategic Housing Development Process is coming to an end in February 2022, to be replaced by new arrangements for "large scale residential developments" (LRDs). While numerous SHD applications were filed and validated prior to the phasing out of this process, it's important to consider whether or not these should be assessed on their own merits rather than being considered in the context of being a model of development or a process that will have lapsed by the time they are built.

Furthermore, Variation No. 22 of the Dublin City Development Plan 2016-2022, made by the City Council on 10th March 2020, changed the Land Use Zoning Objective of the subject site and the adjoining Glenview Industrial Estate from Z6 to Z10 – 'Inner Suburban and Inner City Sustainable Mixed Uses', along with an added requirement for a Masterplan for the overall lands. By their own admission the developers in this instance have not met that condition. To develop a masterplan, there needs to be collaboration between all stakeholders, including adjoining property owners, residents and community groups and Dublin City Council planners. A masterplan should include analysis, recommendations, and proposals for a site's population, economy, housing, transportation, community facilities, and land use. It is based on public input, surveys, planning initiatives, existing development, physical characteristics, and social and economic conditions.

The self-described masterplan which has been produced for this site is singular in nature, considered in isolation, produced without consultation and without consideration of these varying factors. It is the contention of Councillors who attended a Special Meeting of the South East and South Central Areas in January that the Z10 zoning can only come into effect once the requirement for a masterplan is met. In the meantime, this application should not be considered.

In addition to the above raised points, we hope you will consider the following observations:

- The SHD process has seen a number of high-density developments being proposed for Drimnagh, with each being considered and evaluated in isolation and out of the context of the Dublin City Development Plan or the needs of the wider community. Services and facilities in Drimnagh are not currently at a level which can withstand an influx of several thousand new residents, with no concurrent plan to deliver extra capacity on these services and no community gain.
- The investor-led build-to-let nature of this development, along with the high proportion of studio and one-bed apartments, does not constitute sustainable development, and the number of studios and one-beds is over and above what is permitted in apartment guidelines. Growing communities require large-scale or high density developments to have a mix of tenures and apartment sizes, but Drimnagh is facing an over-saturation of investor-led build to let which is solely about maximising units and revenue.
- The development contains a very small proportion of useable open space with just one small communal courtyard. This is not appropriate for a large development of studio flats and one-bed apartments, as such a development should have adequate useable open space for people to get out and spend time outside of their studios or their apartment.
- The plan proposes a short 22m distance of apartments from the backs of adjacent two-storey houses on Dolphin Road, many of which have extensions that would not be 22m from the apartments. Furthermore the distance to boundary wall is as low as 3.4m to 3.8m in places, and this is far too short.
- The separation distance to adjacent dwellings and distance to boundary walls was stated to be far too short and unacceptable.
- The proposed height of 26m is excess of that permitted under City Development Plan which is capped at 24m.

Yours sincerely,

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

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

