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Neasa Hourigan TD  
Leinster House, Kildare Street  
Dublin 2

An Bord Pleanála  
64 Marlborough Street,  
Dublin 1, D01 V902

19th August 2021

Re: 310860: Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9.

Dear Sir/Madam,

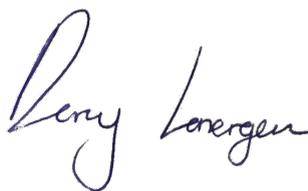
We wish to comment on the above planning application. We have included our observations below and submitted the required fee.

Kind Regards,



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Neasa Hourigan TD, Dublin Central



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Cllr. Darcy Lonergan, Cabra-Glasnevin



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Cllr. Janet Horner, North Inner City



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Cllr. Donna Cooney, Clontarf

And co-signatories listed in Appendix A

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## Observations

It is our desire to see the site developed in a manner appropriate to the location. The city continues to need more suitable accommodation. There are however a number of issues we have with the current application that we feel make it an unsuitable application.

### 1. Build to Rent

Section 3.2 of the “Urban Development and Building Heights”<sup>1</sup> requires

“The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”

It is our view that there is an overconcentration of planning being awarded for build to rent accommodation in Dublin City Centre. At 1,641 units the development alone represents a significant number of dwellings in the area which will solely be build to rent.

We would encourage An Bord Pleanála to view the application in light of the number of applications for build to rent that have been approved in the wider area (across the northside of Dublin City). While there might be a place for some amount of such developments it is difficult to see that the volume of such applications being approved is the best use of the limited land bank in the city. The Dublin Inquirer<sup>2</sup> recently published an article which stated that between 2018 and 2020 as much as 70% of housing units granted permission in Dublin City Council were build-to-rent. Our own review of Strategic Housing Developments applications to An Bord Pleanála in the past year in the Dublin City Council area indicates a similar number, with approximately 65% of units being build-to-rent.

We note that An Bord Pleanála has already raised concerns in the pre application consultation about compliance with Dublin City Development Plan policy QH6 (“creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures”) and policy SN1 (“urban neighbourhoods throughout the city which are well designed, safe and suitable

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<sup>1</sup>

[https://www.housing.gov.ie/sites/default/files/publications/files/urban\\_development\\_and\\_building\\_height\\_guidelines\\_for\\_planning\\_authorities\\_december\\_2018\\_0.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/urban_development_and_building_height_guidelines_for_planning_authorities_december_2018_0.pdf)

<sup>2</sup>

<https://dublininquirer.com/2021/04/28/is-build-to-rent-crowding-out-other-kinds-of-homes-in-dublin>

for a variety of age groups and tenures”). We believe that the development as planned with 100% build to rent is in violation of these policies.

## 2. Zoning & public access

Based on our own rough calculations it appears that the Z12 zoning requirement for 20% of the site to be retained as accessible public open space is being met.

We would ask however that a condition be included with any grant that the areas identified as public open space are accessible to the public as near as practical to 24/7. Such a condition should provide clarity and will prevent disputes once the development is open.

## 3. Unit Mix

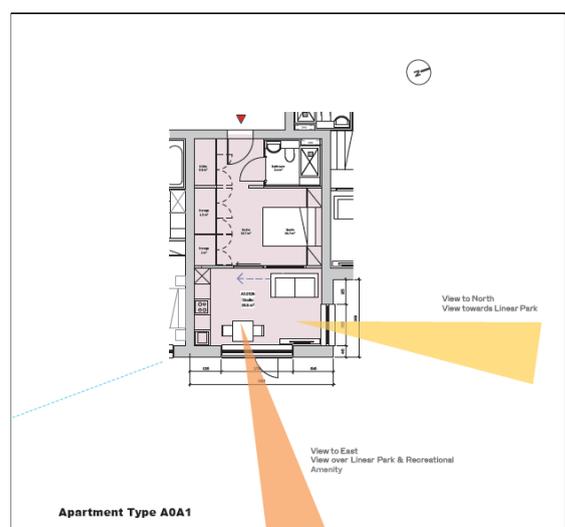
This proposed development is in contravention of the Dublin City Development plan and does not make valid reasons for doing so. Dublin City Development plan 2016-2022 estimate of the distribution of dwelling sizes per bedroom required to meet projected demand: 1 bed 20%, 2 bed 40%, 3 bed 30%, 4 bed 10%, 5 bed 5%.

This development does not meet the objectives of Dublin’s Housing Strategy. QH1: To have regard to DECLG guidelines on Quality Housing for Sustainable Communities - Best practice guidelines and sustainable residential development in urban areas and the accompanying Urban Design Manual.

## 4. Dual Aspect

We note that An Bord Pleanála raised concerns in the pre application consultation about the low number of Dual Aspect apartments in the development.

The rationale for mandating dual aspect is that “sunlight reaching an apartment significantly affects the amenity of the occupants. Dual-aspect apartments, as well as maximising the availability of sunlight, also provide for cross ventilation and should be provided where possible.”



Many of the apartment layouts in the Dual Aspect Analysis Report do not meet these goals and appear to try to meet the

dual aspect goal with corner windows rather than anything that is materially dual aspect.

We believe that the proposals as outlined will result in reduced residential amenity for future occupants.

## 5. Fire brigade access

Some concerns<sup>3</sup> have been expressed around the accessibility by the fire brigade of taller buildings. Given the heights of the two taller blocks in the development we would ask that An Bord Pleanála is satisfied with the fire safety measures in place.

## 6. Access to communal space

It is not clear to us how access to the communal open space areas is controlled. It appears that some communal spaces (e.g. A1 block) will have gated access to the communal space. It is not clear that the same restrictions will be in place for example to the communal space in blocks A3 and A2 (the blocks being sold to Dublin City Council as part of the Part V social housing obligation).

We would ask that An Bord Pleanála look at the access to communal open space at the level of individual residents. This will avoid a situation where there may be sufficient communal open space overall but that certain residents have insufficient access.



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<https://dublininquirer.com/2021/08/04/dublin-fire-brigade-not-equipped-or-trained-to-deal-with-fires-in-high-rises-says-firefighter>

## 7. Data points in “Daylight & Sunlight Analysis- Appendices”

We are not in a position to validate the data points in the “Daylight & Sunlight Analysis - Appendices” document given the volume of data involved but a cursory spot check reveals what appears to be inconsistencies.

Talking the data in A2.4.6 as an example:

- The first five data points in this table have Model PWSH Reduction in ranges between 0.6 & 0.3. Based on “2.3.1 Classification of Reduction” in the “Daylight and Sunlight Analysis” report these should be classified as either “Minor Adverse” or “Major Adverse”. The document however classifies all these data points as “negligible”.
- The last data point in this table has a reduction of 1.6. This seems to indicate that the point in question will get more sunlight *after* the development is constructed. It is difficult to understand how this might be the case.

As mentioned this is just a sample but should the above issue be widespread then we feel the applicant should be required to reissue a corrected document.

## Appendix A - Co-signatories

1. Jane Doe, Elizabeth Street
2. John Doe, Clonliffe Road
3. ...
4. ...