

Neasa Hourigan
Leinster House
Kildare Street
Dublin 2

Dublin City Planning Department
Civic Offices
Wood Quay
Dublin 8

26th September 2022

Dear Sir/Madam,

We wish to comment on the above planning application on behalf of Neasa Hourigan TD and Cllr. Darcy Lonergan.

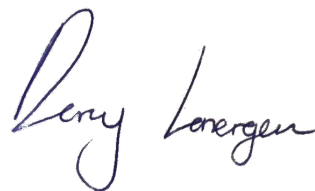
It is our desire to see the site developed in a manner appropriate to the location. The city continues to need more suitable accommodation. There are however a number of issues we have with the current application that we feel requires that the application be amended.

We include below our observations on this planning application, and have submitted the required fee.

Kind Regards,



Neasa Hourigan TD, Dublin Central



Cllr. Darcy Lonergan, Cabra-Glasnevin

1. Public Open Space

There is a 10% public space requirement for this development. We have a number of questions on this that we would ask the planners to consider as part of the application review.

The open space comprises:

1. Junior Playground 88 m²
2. Senior Playground 218 m²
3. Neighbourhood green 621 m²

This comes to 927 m² in total.

The application states that 2,040m² of Public Open Space has been provided. This represents 10.1% of Site Area of the parent permission 20,186m².

Question 1: The 2,040m² is reached through the inclusion of space (including footpaths) around the playgrounds and the green. On what basis are these additional spaces included? The shape outlined in the “Public Open Space and Communal Open Space Plan Table of areas” maps seems quite arbitrary and seems to have been drawn to meet the 10% requirement as opposed to on the basis of a coherent public space.

Question 2: From the materials provided we have been unable to verify the size of the areas identified as public open space by the applicant. Is this something Dublin City Council can verify?

We note that the original application on this site (3665/15) had less than the 10% Public Open Space required. On appeal the An Bord Pleanála grant conditions required the reconfiguration of the development to facilitate additional public open space. The compliance submissions related to those conditions show open space of 2,639m² on a site of 20,277.9m²

Question 3: How had the overall site size changed from 20,277.9m² to 20,186m²

2. Chargers for electric vehicles

Only 14 chargers for electric vehicles seems low. We appreciate that this is in compliance with the Dublin City Council Development Plan requirements of 20% of the resident parking spaces..

However the European Parliament's recently agreed¹ to end the sale of new Internal Combustion Engines vehicles by 2035. As such 14 spaces seems limited. We would ask that this number be increased.

We could also ask that charging facilities be provided for visitor and car club spaces.

3. Basement impact assessment

We note that DCC clarified that a basement impact assessment was not required for this application. Given the proximity of protected structures (from the record of protected structures: "*Former Player's factory: granite facade, including railings, gate, piers, plinth walls and red brick chimneystack*") adjacent to the site we feel an impact assessment of basement works on these structures is metited.

At a minimum conditions should be included on any grant around protection of these structures during the construction phase.

4. Location of the Part V social housing

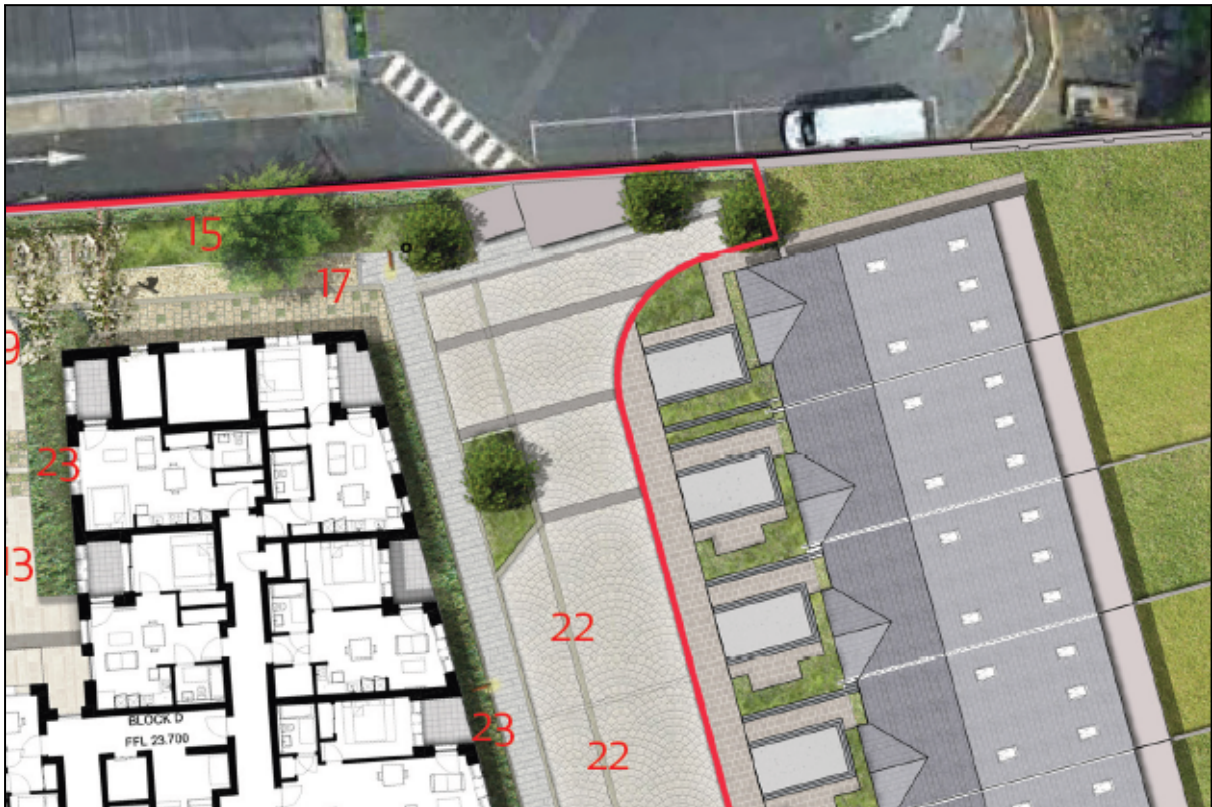
Our preference would be to see the social housing units mixed into development rather than all units together in one block. Currently all Part V apartments are on the lower floors of block A. We note that block A is the road facing block and the only block without shared outdoor communal space.

5. Pedestrian impact

The area is, in parts, already difficult to navigate for pedestrians, being near the confluence of the busy R108 and R135 roads. While this will mainly be

¹ "Fit for 55: MEPs back objective of zero emissions for cars and vans in 2035"
<https://www.europarl.europa.eu/news/en/press-room/20220603|PR32129/fit-for-55-meps-back-objective-of-zero-emissions-for-cars-and-vans-in-2035>

dealt with external to the scheme we feel that pedestrian/cycle permeability of the overall scheme is important. A condition of the grant should be that pedestrian/cycle permeability be achievable when the remainder of the site is developed. It currently looks like any permeability at the North East corner is obstructed by bin storage.



6. Height with respect to adjoining streets

The height of the development must be considered in terms of the adjoining streets. At a 25m elevation above sea level the site, while roughly level with Iona Road/Park, stands significantly higher than Cliftonville Road (19m) and Marguerite Road (21m). We would ask the planners to consider the privacy implications for residents on these streets and mandate privacy shielding mechanisms as appropriate.