



Councillor Carolyn Moore
C/O Richard O'Carroll Room,
City Hall,
Dublin 2.
December 13, 2023

Dublin City Council Planning and Property Development Department,
Civic Offices,
Wood Quay,
Dublin 8
REF: LRD6024/23-S3
Davitt Road / Benbulbin Road, Drimnagh, Dublin 12

To whom it may concern,

As a Councillor for the Kimmage Rathmines area I would like to share some observations and comments on the Large-scale Residential Development proposed on the site of the Marble Arch pub and adjacent warehouse-style buildings, with frontage on both Davitt Road and Benbulbin Road in Drimnagh, REF: LRD6024/23-S3. As is evident from the Design Statement enclosed with the application, this proposal has undergone some significant revisions over the last year and following meetings and feedback from Dublin City planners across several iterations of the proposal. The resulting proposal has been reduced in height, scale, mass and density; it has added a green roof, lost a community space, offered improvements to the streetscape, and stepped down in height to better interface with the existing low-rise housing that makes up this Drimnagh neighbourhood.

I am glad to see that the applicants have addressed some significant issues with the design approach and concept prior to bringing it to planning, and that we are now viewing a proposal that I believe is of an appropriate density for a brownfield site well serviced by public transport and within easy reach of the city centre and key amenities. Nonetheless, by the developer's own admission, the building is '*a prominent addition to the views*' locally, protruding well above the houses' rooflines, and its scale is '*in stark contrast*' to the surrounding houses. As the developer also acknowledges,

- *Residential receptors are inherently sensitive to change that affects the visual or other residential amenities of their home environs.*

With Ireland in the midst of an unprecedented housing crisis, and Dublin in particular being in dire need of increased supply, I hope that this development will help address the urgent need for housing. While I would prefer not to see planning granted to developments that contain studios in their typology mix, I acknowledge that this development proposes just three studios, and the overall mix of one and two bed apartments, whether for sale or for let, will be a welcome addition to the housing supply for this area.

However, recognising that the housing crisis is also one of affordability, I 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. As previously mentioned, and acknowledged in

the planning application, this 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 largely seen are not proposals that add value to the community of Drimnagh while at the same time bringing affordable accommodation options on stream. Instead we have been presented with, and in some cases approved, a number of SHD applications which will ultimately fail to address the affordability aspect of our housing crisis and which fail to take account of the existing deficit of services in the community of Drimnagh. On the matter of tenure, I have not been able to ascertain if the proposed development for the Marble Arch site remains a 100% built-to-let proposal, noting that on page 14 of the aforementioned Design Statement (*Section 4.0 Design Approach, 4.4 Design Evolution*) the applicants state that in December 2022, Scheme 02:

- *This revised scheme reduced the height of the scheme by a floor, and omitted the Build-to-rent element of the scheme.*

If this element of the scheme has been revised it should be made clear what the proposed tenure mix is. Growing communities require large-scale or high density developments to have a mix of tenures and apartment sizes, and we must ensure that Drimnagh doesn't face an over-saturation of investor-led build-to-let which is primarily about maximising revenue.

Neither I nor the residents of Drimnagh 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, and in light of the existing Drimnagh Integrated Area Plan, we want to ensure that housing is delivered in a way that grows this community sustainably, and I would note that Drimnagh's essential services and facilities, including health and education, 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.

With that objective in mind I would like to submit the following observations on the proposed development ref LRD6024/23-S3:

As stated in the Design Statement (*Section 4.0 Design Approach, 4.4 Design Evolution*), in response to Dublin City Council's LRD Opinion dated 15th May, 2023:

- *1a. Floor Omission: The building massing has been redesigned so as to reduce the height of the building. A floor of the building has been omitted, reducing the scale of the building throughout.*

This has reduced the total residential area of the development and so the previously proposed community uses have now been omitted.

Noting that the applicants did not opt to remove the proposed commercial spaces within this compact development, clarity is needed on how the developer intends to provide for a minimum 5% community, arts or culture space. Drimnagh will see an increase of 1,152 new homes by 2025, and an additional 5,000 by 2030, leading to a projected population increase of over 25,000 residents. The people of Drimnagh will need access to civic, cultural and sports spaces large enough for a thriving and growing community. Dublin City Council planners must impose a condition that ensures the

transfer of 5% community space remains within Drimnagh and is to the benefit of the wider Drimnagh community. For example, it could complement or augment DCC's recently confirmed €2.4m capital investment in Brickfields Park - the closest park and largest local amenity to this development, or it could contribute to the development of a proper civic space for the community.

On the matter of shared or communal spaces within the development, recent issues with Part V residents being unable to access amenities within the nearby 'The Davitt' complex should serve as a strong enough rationale to impose a condition on any future developments that all shared, communal, play or amenity spaces are fully and equitably available to all residents.

Noting the lack of play space in the communal courtyard, I would also point out that the failure of this application to provide for childcare facilities has to be considered in the context of several adjacent LRD and SHD developments (in various stages of approval, review and ongoing development) all having used the same rationale to circumvent the legal requirements for childcare provision. There is no evidence to support the idea that a development of one and two bedroom apartments does not generate the same need for childcare, and cumulatively it is now almost inevitable that the failure of several large-scale developments to meet this demand will lead to a localised shortage of childcare spaces in an already stretched sector.

To combat vacancy and optimise the benefits to the wider community of this development, planning permission should be conditional on ensuring the commercial units are not allowed to lie vacant. The Townscape and Visual Impact Assessment accompanying this application sets out the benefits of having an 'active frontage' on Davitt Road, with a ground floor restaurant/café, a gym and retail unit proposed.

With numerous developments coming down the tracks for Drimnagh it's essential they don't lead to a proliferation of vacant ground floor units, as can be seen elsewhere in the city, and already in Drimnagh - particularly as the sheltered colonnades design will require passive surveillance to prevent it from attracting anti-social behaviour. The community of Drimnagh would welcome a licensed restaurant or café for the economic development of the area and in line with developing a Canal Village as set out in the Dynamic Drimnagh 2030 Plan, but do not wish to see further units lying vacant for extended periods of time.

The Townscape and Visual Impact Assessment, on page 8, describes an 'emerging high density neighbourhood' on the larger parcel former industrial lands south of Davitt Road. It is important for the sustainable development of Drimnagh and this emerging new urbanised quarter that a cohesive approach is taken across all developments. I welcome the efforts in the design approach to make this a 'companion' development to the adjacent SHD, and the recognition of 'sensitivities in the receiving environment', however aiming to achieve social cohesion should be equally prioritised. That social cohesion is undermined from the outset if this development attempts to set itself apart from Drimnagh.

Throughout the documents accompanying this application, the developers consistently ignore the amenities, services and facilities that are available to residents in Drimnagh, and would be the closest available services to residents of this development, in favour of listing similar services and amenities in Inchicore or Dublin 8. While the site has been rezoned into the SDRA 9 (Emmet Road, Dublin 8), it

is very definitely located in Drimnagh, Dublin 12, and this approach reflects a trend for developers proposing or building large scale developments in Drimnagh to misrepresent their location. Our planners must not overlook this, as it should not be within the remit of developers to redraw the boundaries of our communities or administrative areas.

I note and support the objective to discourage private car ownership at such an accessible and well serviced site, and the provision of 25 car parking spaces seems adequate on that basis. However, it must be noted that this objective does not always reflect the reality of car ownership levels in our city, and 'spillover' parking does have the potential to become an issue here, as it has become an on-going issue at the Davitt nearby.

There must be a commitment from DCC to exercise rigorous parking enforcement in the area, particularly in light of the threatened withdrawal of service of the 123 bus from Galtymore Road last year, due to excessive parking creating safety issues for the drivers. In this regard I support the request of the Dynamic Drimnagh group for a strategic traffic plan for the area and consideration of a one-way system in parts of the estate.

Equally, while the proposal provides for a lay-by on Benbulbin Road, existing schemes and large-scale developments in the area show lay-bys and drop off zones are not being used, with delivery vehicles and others parking on the street instead. There is also no clarification on the nature of this lay-by and whether it's for commercial vehicles only, and if it will service as a loading bay for the restaurant / café and retail space.

The potential for flooding of a basement parking facility should also be noted, in light of previous flooding incidents at the betting shop and the serious flash flooding which occurred at Slievenamon Road and Galtymore Road during a heavy rain event during the summer.

Finally, I note this application is not accompanied by a Biodiversity Enhancement Report and therefore it is not possible to ascertain if it will result in a net gain for biodiversity. I recognise and welcome the improvements to the public realm at the site that will come with increased footpath widths, street trees, tree pits and other greening, and I welcome too the use of tightly spaced trees to provide natural screening where the courtyard backs on to the back gardens of Galtymore Road. I note also the addition of a green roof to the revised Scheme 02 in 2022, however there is very little detail provided on the planting plans, or for any of the greening objectives, landscaping plans, species or types of planting, other than references to 'ornamental' planting, and a reference to native planting being used to reinforce the existing characteristics of the environment.

As defined in the Dublin City Development Plan, the Grand Canal is a corridor in our green infrastructure network, described as:

- *vital to maintaining connectivity of habitats in the landscape and provide for animal movement, seed and pollen dispersal, and plant migration.*

As this development sits in and would overlook the Grand Canal conservation area, it's critically important that all planting is native and pollinator-friendly, and that it creates no risk for contamination of the canal via the introduction of an invasive species to this environmentally

sensitive ecosystem and wildlife corridor, which is interconnected with the city's wider green / blue network.

In line with Policy GI16 of the Development Plan, this development is also:

- *required to support local biodiversity and incorporate biodiversity improvements through urban greening and the use of nature-based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity and provide links to the wider Green Infrastructure network. All suitable new buildings will be required to incorporate swift nesting blocks into the building fabric.*

As this development lies within a catchment that already supports a growing population of swifts, the developer should be instructed to incorporate swift bricks in the fabric of the building, as neighbouring developments have also proposed. Bat boxes would also be a welcome enhancement to support biodiversity and habitat expansion at this location.

For the most sustainable outcome, I hope our planners will take these observations on board, and consider the feedback also of local residents and the wider Drimnagh Community.

Kind regards,



Cllr Carolyn Moore

Green Party Councillor for Kimmage-Rathmines