

Councillor Carolyn Moore
c/o Richard O'Carroll Room,
City Hall,
Dublin 2.

Applicant: The Adroit Company Ltd
An Bord Pleanála ref: TA29S.314124
Date: August 23rd, 2022

To whom it may concern,

I wish to make the following observations on SHD application ref: 314124, for 194 apartments along with a creche and commercial units on lands at Harold's Bridge Court and nos. 1 to 3 Clare Villas.

I would like to start by agreeing with the Harold's Cross Community Council and the residents it represents that it is important to view this application in the context of an earlier application to Dublin City Council by the same applicant to redevelop the same site – planning reference 3605/16 – which was rejected by Dublin City Council. This refusal was appealed by the applicant to An Bord Pleanála – case reference 247583 – and upheld.

Notwithstanding the fact that the applicants, The Adroit Company Ltd, have made some notable improvements to the nature of their current proposal, primarily around addressing issues of permeability and compliance with the Z6 zoning of the MART warehouse, I think it must be acknowledged that a maximum four storey scheme of 121 apartments proposed in 2016 and rejected by An Bord Pleanála on the grounds of the scale, height and mass as being 'visually obtrusive', 'out of scale' and representing 'overdevelopment' is returning to planners in the guise of a Strategic Housing Development, with increased scale, height, mass and density.

As such, and as acknowledged by the developer, the current proposal materially contravenes the Dublin City Development Plan in several key regards, most notably and concerningly around building height, urban density, dwelling mix, respecting the character of the existing neighbourhood, and giving due consideration to the National Planning Framework objective of prioritising the provision of new homes at locations that can support sustainable development at an appropriate scale of provision relative to location.

Just as An Bord Pleanála's 2017 decision deemed the applicant's earlier proposal to be 'out of scale', so the increased scale of the current proposal cannot be considered appropriate relative to the height and scale of existing and neighbouring buildings.

I urge the Bord to give due regard to the submission of the Harold's Cross Community Council, representing the views of a wide range of local residents, and also to the collective submission of the residents of Parnell Road, whose concerns about over-shadowing (a

reason cited by DCC in their refusal of the 2016 application) have not been adequately addressed.

I would furthermore like to highlight the following points:

- While I appreciate the site in question is potentially suitable for a higher density form of housing than is currently in situ, I'm concerned that the developer has only considered increasing density in the context of demolishing more than 50 dwellings ('in good condition generally'), 48 of which were constructed less than 30 years ago. There is no mention in the plans of the embodied carbon in these dwellings, the carbon footprint of the new development, or the ways in which the developer might look to make this new urban quarter a low or zero carbon district, by virtue of the materials used or the ways in which the carbon footprint might be offset over the life of the building. It is not in keeping with either the city's climate objectives or the objectives of the Development Plan to demolish and rebuild, displacing some 200 occupants, without first considering more innovative ways of modernising and expanding an existing scheme.
- While the 2016 proposal contained provision for solar panels, there is a missed opportunity here to include solar panels on the areas of roof not proposed for use as roof gardens or terraces; and rain water collection would also help to improve the overall sustainability of the development, along with mitigating the risk of flash floods.
- I fully support the applicant's decision to provide a low number of car parking spaces (0.4 spaces per unit) relative to the requirements of the current Dublin City Development Plan, and I think it is appropriate to consider that car ownership is not necessary or desirable in a location so close to the city and so well served, currently and into the future, by public transport. Encouraging future residents to use sustainable transport alternatives such as bicycle, shared car schemes and public transport should be a key objective of any large scale urban development. But while ample bicycle parking is available I wonder if this could be less concentrated in the basement car park, and if the creche in particular could have ample bicycle and cargo bike parking to facilitate drop offs by sustainable transport modes.
- I appreciate the efforts made by the developer to provide an appropriate level of permeability for the new proposal, making it open and highly permeable for pedestrians and cyclists in particular, and providing additional links and amenity value to surrounding streets. In conjunction with a reduction in car parking spaces this added efficiency and access should encourage residents to choose sustainable transport modes, which should be a core objective of high density urban developments. The opening up of the streetscape on Harold's Cross Road by any new development would also be welcomed.
- I would welcome the addition of any new housing development to the area that is not exclusively build to rent, and appreciate the intention for this proposal to meet the needs of a wide range of future occupants from first time buyers, young

professionals and small families with children, who wish to live close to the city. However, the tenure mix is unclear, and I would strongly oppose the segregation of the developer's total Part V allocation of 39 units to half of one block (Block B), a proposal that runs contrary to inclusive and sustainable community building.

- In general the current proposal undoubtedly provides better quality of open space and commits to incorporating SuDS, promoting biodiversity and providing residential amenity, however some area of 'public open space' still feel incidental and lacking in amenity value by virtue of being the space between buildings and boundaries. Furthermore, any new urban quarter should seek to maximise inclusivity, amenity value and play opportunities, and children's play areas should incorporate inclusive and/or sensory play equipment, and in 1,355 sqm of open space there should be provision for a sensory garden or other stimulating spaces.
- Block D (to be completed in Phase 2 of the development) aims to accommodate the same programme that exists on the site at present, providing MART with a new building featuring ground and first floor artist studios, gallery spaces and services beneath 3 storeys of residential apartments. This is a positive proposal and a good replacement for the MART building, and Phase 2 could be completed as a standalone project without the need to demolish the existing housing. However, Block D will ultimately provide just 65% of the existing MART space; there is a lack of clarity around the provision of artist spaces as stand-alone studios vs live/work spaces; and in the event that the MART warehouse was rezoned to Z1, can the developer offer assurances that there would be no future change of use of these artists' studios to residential?

On the matter of construction traffic, for any future or potential development on this site a robust traffic management plan will be vital to ensure that construction traffic would not adversely impact on or delay buses using the QBC on Harold's Cross Road, or endanger cyclists using what is already a less than ideal shared space for buses and cyclists. We have seen too many accidents in the city involving construction traffic turning into tight spaces which puts them into conflict with cyclists. Any traffic management plan must mitigate this risk at all times, but particularly during school drop off and collection times.

Additionally, it would be remiss of me not to mention the flood risk associated with this site and urge the Bord to consider that this risk has not been adequately addressed in this proposal. The 2011 flooding event which flooded homes on all sides of the site, namely Greenmount Ave, Limekiln Rd, Parnell Rd and Harold's Cross Rd, resulted in the tragic loss of a life, and this proposal appears to ignore the very real possibility of a repeat of an event of this nature. Flood attenuation works to protect the homes in this area are still at planning stage, the application for the Poddle FAS scheme having been with An Bord Pleanála since 2020, and insurers currently rate the area as high-risk in terms of flooding probability. A number of adjacent properties are currently unable to get flood cover, and until such time as these works are complete and fully assessed it would be reckless to undertake what amounts to the hard overdevelopment of an affected site.

Finally it is also worth noting that many of the observations and concerns raised by local residents and local representatives in 2016 pointed to the lack of a Local Area Plan for Harold's Cross, and that concern still stands. While the community of Harold's Cross is well located to accommodate gentle and moderate-to-high density residential development, and the considered and sustainable development of much-needed housing in the area would be welcomed by the wider community, it has been acknowledged and agreed that this should only happen in the context of a Local Area Plan which would enable that development to happen in a coherent and coordinated fashion, and in tandem with the delivery of the services and infrastructure that would support it.

Thank you in advance for considering these points.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Carolyn Moore', written in a cursive style.

Carolyn Moore

Green Party Councillor for Kimmage Rathmines