



Observation on a Strategic Housing Development application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Councillor Carolyn Moore

(b) Observer's postal address

Richard O'Carroll Room, City Hall, Dublin 2

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you **or** to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

309627

- (b) **Name or description of proposed development**

Former Heidelberg/Miller Building and S.C.R Garage sites

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Davitt Road, Dublin 12

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write. You can also insert photographs or images in this box.

(See part 6 – Supporting materials for more information.)

Cumulative impact of SHDs on community

While I fully acknowledge the housing crisis that we are in, I feel we need to be extremely cautious about addressing it in a considered and sustainable way, which by and large SHDs fail to do. Instead, the SHD model facilitates a circumvention of the Dublin City Development Plan and the traditional planning process, and in an area like Drimnagh where a number of brownfield sites with exceptional development potential have recently been rezoned, we risk ending up with an oversupply of one type of housing. Build-to-rent apartments have the potential to be one part of the solution to the housing crisis, but they are not conducive to the sustainable, long-term development of our communities.

I share the concerns of Drimnagh residents about the impact of this proposed development on the community – not just as a stand-alone development, but as one of a number proposed developments that will permanently alter the landscape of this community. As it stands, this wide-scale development will be occurring without the benefit or guidance of a local area plan, and there is a legitimate fear that one after another these potential developments will turn to the SHD model, effectively working outside the remit of the Dublin City Development Plan, increasing heights and density beyond what would otherwise be allowed, and ultimately securing permission without a 'big picture' perspective being taken into consideration.

In particular I have concerns about:

- The lack of civic and green spaces in Drimnagh and the failure of this proposal to add anything of community value in terms of amenity value or public spaces.
- The lack of community gain, generally; the questions around permeability and the openness of this development and the lack of provision of any community space.
- The provision of wider community service, while the responsibility of the developer, has to occur in tandem with any growth in the population. The area is already underserved in terms of GPs, school places, lack of a Primary Care Centre, etc, and there are legitimate fears that unfettered development will put further strain on these services.
- The lack of consultation with community groups about the potential to provide some community gain with this development.
- The lack of big picture thinking - between the five Luas Stops from Suir Road to Bluebell it's proposed that there will be an increase of approx. 4,500 people in 1,418 units on south side of canal. This community needs a comprehensive plan to develop greater infrastructure, community services and facilities and commercial/retail outlets in the area, in tandem with these developments. No one wants to hold up the provision of housing, but it can't be to the detriment of the community.

5. Grounds

- The potential impact on the development of the neighbouring DCC site, which will be developed sustainable, community-oriented social housing. If the Miller Heidelberg site is subjected to over-development at this juncture, this could limit the development potential of that social housing.

Height, density, scale and design.

The proposed development breaches the height guidelines in the Dublin City Development Plan, and the precedent which has been set on the canal. We cannot allow high rise by stealth, with each new SHD proposal edging a story or two over the last one. We have height limitations for a reason, and there is very little justification for There is no justification for a height of 9 storeys along that section of the Grand Canal and no justification for 6 storeys at the back of two storey houses that were built in the 1930s.

- A maximum height of 5 to 6 storeys would be more suited to the area and would appease most of the concerns that people have.
- The roof gardens on the blocks will effectively add an additional storey to those blocks.
- The height is unsuitable for the elevation of the land at this site.
- The design of the development lends nothing of architectural interest to the canal and would establish a low aesthetic bar for the development of this area. We need to be cognisant of the long term, cumulative impact of too many dull, uninspired 'cookie cutter' buildings on our City's streetscape.
- Overlooking will be an issue.

Build to let and unit mix

We need to ensure that every community being subject to major development at the moment has that development potential maximised by building sustainable, inclusive communities. The build to let model has a role to play in that bigger picture, but an entire, large development of build to let should not be allowed. We need to encourage people to settle and stay long term in communities, offering a mix rental units alongside properties to buy and cost rental models with long-term security of tenure.

Furthermore there is an over-concentration of studio and single bed units, and not enough family-sized units. There is a lack of three bed apartments for families who wish to stay or settle in the area.

Impact of construction on the local area

I have concerns about:

- The impact of the proposed development during construction phase on the properties on Galtymore Road. Residents would like the reassurance of an agreement with the developer to carry out surveys and assess and rectify any damage caused to adjoining properties during construction

5. Grounds

- The construction management plan, the safe removal of any asbestos or oil tanks on site and the mitigation measures with regard to dust and disturbance during construction.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

If your supporting materials are physical objects, **you must send** them together with your observation by post or deliver it in person to our office.

You cannot use the online uploader facility.

Remember: You can insert photographs and similar items in part 5 of this form – Observation details

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic housing observation **only** is €20.
- strategic housing observation **and** oral hearing request is €70

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:
- the case number and your name, or
 - the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020

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FEM – Received		SHU – Processed	
Initials		Initials	
Date		Date	

Notes