

Councillor Carolyn Moore
C/O Richard O'Carroll Room,
City Hall,
Dublin 1

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Dublin City Council Planning and Property Development Department,
Civic Offices,
Wood Quay,
Dublin 8
REF: LRD6020/23-S3
Former G4S Property, Herberton Road, Dublin 12

To whom it may concern,

As a Councillor for the Kimmage Rathmines area I would like to broadly welcome this proposal for a Large-scale Residential Development for the former G4S site in Drimnagh, in which I believe the applicants have addressed some of the more significant concerns I had with the SHD proposal for the same site, which was appropriately rejected by An Bord Pleanala in 2022.

By scaling back the development in terms of height and mass while retaining an appropriate density of development for a brownfield site well serviced by public transport and within easy reach of the city centre and key amenities, I believe this proposal is a better fit for both the space and the housing needs of the city. I am glad to see that studios have been removed from the offering, which now consists of a mix of one- and two-bed apartments, each with their own balcony. However, on the matter of tenure, I have not been able to ascertain if this remains a 100% built-to-let proposal.

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. Ireland is in the midst of an unprecedented housing crisis, and Dublin in particular is in dire need of increased supply, but residents in Drimnagh are keen to see housing delivered in a way that grows their community sustainably.

With that objective in mind I would like to submit the following observations on the proposed development ref LRD6020/23-S3:

Firstly, this development is not located in Rialto and I fail to understand why its location in Drimnagh has been misrepresented across every piece of documentation submitted by the developers, except to assume that they believe this will be a more desirable address for prospective tenants. This is not just misleading, it could potentially have the effect of stifling participation in the planning process, and I would stress that it should not be within the remit of developers to redraw the boundaries of our communities or administrative areas by word of mouth.

It is important for the sustainable development of Drimnagh and the larger parcel of land this site is part of that a cohesive approach is taken. That cohesion is undermined from the outset if this development attempts to set itself apart from Drimnagh in a way that is disingenuous at best, cynical at worst.

Important too for the cohesion of future development on this parcel of land is the production of a masterplan. Variation No. 22 of the Dublin City Development Plan 2016-2022, made by the City Council on 10th March 2020, changed the Land Use Zoning Objective of the subject site and the adjoining Glenview Industrial Estate from Z6 to Z10 – ‘Inner Suburban and Inner City Sustainable Mixed Uses’, and added a requirement for a masterplan for the overall lands.

A masterplan should include analysis, recommendations and proposals for a site's population, economy, housing, transportation, community facilities, and land use. It should be based on public input, surveys, planning initiatives, existing development, physical characteristics, and social and economic conditions. To develop a masterplan, there should be collaboration between key stakeholders, including adjoining property owners, residents and community groups, and Dublin City Council planners.

This is a significant parcel of land, perfectly located for the sustainable development of affordable, mixed tenure accommodation. If developed in a cohesive and well planned way, the parcel of land that incorporates this site and the adjoining Glenview Industrial space could transform the periphery of Drimnagh and provide for a thriving urban hub in close proximity to a Key Urban Village. If each site is planned in isolation, we risk squandering an opportunity to get the overall approach, tenure mix, scale of development, affordability mix and provision of community facilities right.

While I understand a community and social audit was undertaken by the developer, who met with the board of Dynamic Drimnagh and approached the other land owners, a comprehensive masterplan consultation has not yet been undertaken, and while the self-described ‘masterplan concept’ which has been produced does take account of adjoining sites, it appears to have been produced without consideration of the varying factors outlined above. It is for Dublin City planners to decide if this satisfies the requirement for a masterplan for the site, however it is my opinion that it does not.

One key area which would benefit from a more holistic masterplan approach is the provision of community/cultural/arts space, and I share the concern of the Dynamic Drimnagh group that if each individual development meets its requirement to provide this space in a piecemeal way the full potential to provide a space that is beneficial to the community won't be realised.

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. The individual provision of small, and potentially insular community spaces across several developments will not service this need or provide social cohesion in the same way that the strategic provision of a shared larger space would, and this could be addressed via a robust masterplanning process.

In the case of this application, the provision of community space is listed as 601 sq m, however in the biodiversity enhancement report it is listed as 472 sq m. The planners should seek clarity on this.

Equally, given the size and multi-use potential of this space, it is important that planners ensure the wider community will have full and unimpeded access it, and that the community would not find themselves unable to access it either by design, through the management policy for the space, or simply by being locked out by the cost of access.

Likewise, to achieve the full potential of this site for mixed use development that brings multiple benefits to the wider community, planning permission should be conditional on ensuring the 1500 sq m of space for medical use and the 63 sq m for café/retail use are not allowed to lie vacant. 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. Sustainable development can only occur when the provision of services and amenities is concurrent with the provision of housing and this should be recognised in the granting of planning permissions.

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 in 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 cycling and light rail. I'm glad to see the NTA supports the development of the site from a strategic transport perspective, and I agree with the NTAs observation that the provision of cycle parking, while adequate in terms of spaces, is limited in terms of accessibility.

I would ask the planners to consider the NTA's requested condition that cycle parking is re-examined with a view to providing a number of Sheffield stands in the secure basement areas which cater more amenable to those with heavier or longer bicycles and e-bikes, with the Development Plan standard total as a minimum. I would further request provision of a greater number of cargo bike spaces, as this will be an attractive transport option for families and for those who don't wish to own a car.

I would like to conclude by acknowledging the ways in which the developers have responded to the serious shortfalls in the SHD application that was rejected last year by both An Bord Pleanála and Dublin City Council, as outlined in the Architectural Design Statement (HER-JFA-SA-P6001). This is a design proposal which allows more light and permeability through the complex, and I trust our planners will stipulate that the outdoor spaces should be accessible to the wider community.

I welcome the reduced height and increased sensitivity of the design approach to the existing streetscape, along with the increased distance between the development and neighbouring homes, however I would urge planners to consider the overshadowing and overbearance issues that remain a concern to some residents on Dolphin Road.

Finally I welcome the plan for biodiversity enhancement, but again I would urge planners to ensure that this is followed through, as it can often be the case that the attractive landscaping proposals that accompany an application can be significantly scaled back in delivery.

As the biodiversity enhancement report notes, the location of this site next to the canal makes it environmentally sensitive. The canal ecosystem is home to both Leisler's and Pipistrelle bats, and this part of Dublin 8 and 12 enjoys a good population of swifts in summer. I welcome the provision of bat boxes and swift bricks for this reason, and the proposed creation of a biodiversity trail and wildlife corridor, not just for their potential to support and enhance the biodiversity of the canal area, but for the quality of life and quality of green spaces afforded to residents in the complex.

I hope you can take the above comments on board.

Kind regards, ,



Cllr. Carolyn Moore

Green Party Councillor for Kimmage Rathmines

