



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

Dublin City Council Planning and Property Development Department,
Civic Offices,
Wood Quay,
Dublin 8

Planning ref: LRD6036/24-S3
Applicant: The Adroit Company Ltd
Date: February 12th, 2024

To whom it may concern,

I wish to make the following observations on LRD application ref: 6036/24-S3, for 181 apartments along with a childcare/creche facility, artist's workshops and a commercial unit on lands at Harold's Bridge Court and Clare Villas.

I would like to start by referencing the planning history for this site and the previous applications which have sought to replace the homes in Harold's Bridge Court and Clare Villas with a high density 'new urban quarter'. A maximum four storey scheme of 121 apartments proposed in 2016 was rejected at the time by An Bord Pleanála as being 'visually obtrusive', 'out of scale' and 'representing overdevelopment'. The proposal returned to planners in 2022 in the guise of a Strategic Housing Development which had increased in scale, height, mass and density, but this application was also rejected by An Bord Pleanála, with the rationale that:

Having regard to the massing, scale, extent and design of the overall proposed development, in conjunction with the disposition of the proposed buildings on site, it is considered that the proposed development would be visually incongruous at this prominent location, would fail to respond adequately or integrate in a cohesive manner with the immediate and surrounding built environment and would fail to make a positive contribution to the urban neighbourhood and streetscape.

Notwithstanding the fact that the applicants, The Adroit Company Ltd, have reduced the maximum height within this development to seven storeys, this still exceeds by two storeys the highest comparable developments in the Harold's Cross vicinity, which is now a Priority Architectural Conservation Area. The reduction in height has been achieved by squeezing out the three bedroom apartments to minimise a corresponding reduction in density. As such, the proposal before planners now remains — in the context of a site subject to numerous constraints and with significant considerations at play, including history, heritage and the proximity of protected structures, along with the sensitivity of its built environment and the canal as a conservation area — out of scale and visually incongruous relative to the local environment and the existing built form.

But perhaps the most significant consideration affecting this site is the displacement of the 200 occupants of the 51 houses that this proposal would see demolished to make way for this high density 'new urban quarter'. While I appreciate that the site in question is potentially suitable for a higher density form of housing than is currently in situ, it's concerning that in three iterations of this proposal the developer has only considered increasing density in the context of clearing this site by demolishing more than 50 dwellings ('in good condition generally'), 48 of which were constructed less than 30 years ago. There has been no attempt to explore or develop a proposal that would achieve a gentle increase in density, providing additional housing on the site while remaining sensitive to the existing community and not displacing the residents of Harold's Bridge Court and Clare Villas.

It is not in keeping with either the city's climate objectives or the objectives of our Development Plan to demolish and rebuild buildings in good condition without first considering more innovative, climate-friendly and circular ways of modernising and expanding an existing scheme. The core argument of the 'Justification for Demolition' report (which seems to argue that a 1990s-build cannot achieve the same energy rating as a new build through a deep retrofit process) seems ill-founded, particularly when the 'Building Lifecycle Report' indicates the low energy technologies that are merely 'being considered' for the development and during the design stage of the development, in order to meet the requirements of Part L of the Building Regulations and to meet the Near Zero Energy Building standard, if required. The efficiencies outlined, therefore, can only be speculative, including condensing boilers 'being investigated', natural ventilation 'being evaluated', and PV solar panels 'being considered'.

These and other points are well made and robustly supported by observations compiled by Harold's Cross Village Community Council, representing the views of a wide range of local residents, and the residents of Parnell Road, and I urge the planners to give due regard to these submissions.

In addition, I would like to highlight the following points:

- I appreciate the efforts made by the developer in 2022, and retained in this proposal, to provide an appropriate level of permeability for this development, 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.
- Improvements to the quality of the communal outdoor space across various iterations of this proposal are welcome, however some areas of 'public open space' still feel incidental and lacking in amenity value by virtue of being the space between buildings and boundaries.
- Furthermore, an additional reason for An Bord Pleanála's refusal of the 2022 proposal was '*the disposition of the proposed buildings on site*' and this has not been addressed in the current application, which proposes (and justifies) the same general layout, with the potential for overbearing and overlooking remaining. In addition, the

proposal fails to provide for an appropriate transition in scale to existing residential development, including one storey cottages.

- I support the applicant's decision to provide a relatively low number of car parking spaces per the objectives 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 close to the city and 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. The ample provision of bicycle parking is welcome, including the provision of 120 spaces at ground floor level across blocks A, B, C and D. However, the childcare/creche facility should also provide for ample bicycle and cargo bike parking to facilitate drop offs by sustainable transport modes.
- 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 flood attenuation works to protect the homes in this area are only now getting underway and are not due to reach completion until 2026. Insurers continue to rate the area as high-risk in terms of flooding probability and a number of adjacent properties are currently unable to get flood cover. Until such time as the flood works are complete and fully assessed it would be reckless to undertake what An Bord Pleanála classed as 'the overdevelopment' of an affected site.
- The proposed tenure for this development is unclear. The development of a new urban quarter should seek to meet the needs of a wide range of future occupants from first time buyers, young professionals and families with children, who wish to live close to the city, and with the reduction of three bedroomed apartments to just one unit this proposal is unlikely to achieve that. I would also strongly oppose the segregation of the developer's total Part V allocation of 38 units to half of one block (Block B), a proposal that runs contrary to inclusive and sustainable community building.
- The biodiversity enhancement plan accompanying this application is inadequate for a site which sits in close proximity to the Grand Canal, defined in the Dublin City Development Plan as a corridor in our green infrastructure network, and described as:
 - *vital to maintaining connectivity of habitats in the landscape and provide for animal movement, seed and pollen dispersal, and plant migration.*

It's important that the planting and landscaping on this site 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. Additionally, In line with Policy GI16 of the Development Plan, suitable developments are required to incorporate swift bricks in the fabric of the building. Bat boxes would also be a welcome enhancement to support biodiversity and habitat expansion at this location.

- Furthermore, the plans outlined for the roof terraces, featuring bamboo screening, colourful seating, garden kitchens, paving and artificial grass, prioritise amenity value

over sustainability and biodiversity objectives, and in this regard I feel the application fails to demonstrate how the development complies with Policy SI23 of the Development Plan, which requires all new developments with roof areas in excess of 100sqm to provide for a green blue roof.

- On the provision of community, arts or cultural space, the offering - still housed within Block D - once aimed to accommodate the same programme that exists on the MART 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. However this seems to have been significantly curtailed in the current application, which provides for ten community/artist workshops, which appear to have the potential to operate as live/work spaces. Occupying similar floor space to a studio, my concern is that these would be subsumed into the residential offering and there would be a failure to meet the requirement for 5% community / cultural space.

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, and too many incidents on Harold's Cross Road of construction traffic blocking pavements and cycle lanes to the detriment of vulnerable road users. Any traffic management plan must mitigate this risk at all times, but particularly during school drop off and collection times.

Finally, I would urge Dublin City Council planners to note that many of the observations and concerns raised by local residents and local representatives in 2016 and again in 2022 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, 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