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This submission to An Bord Pleanála relates to Botanic Strategic Housing Development ABP Ref: 303875.

There have been no new homes built in Dublin Central since 2011 which is a cause for major social and economic concern.

The proposed development site on Botanic Road has enormous potential to provide desperately needed homes, I support the building of new homes and would like to see the site deliver good quality affordable homes.

This application follows on from an existing planning permission granted to build 119 residential units of which only 35 have been built on the site.

It reflects poorly on the application that the applicant declined a request from the local residents for a meeting locally to review the amended proposals.

This is a once in a lifetime chance for this important site to deliver increased home ownership with good quality affordable homes that complement the existing residential community and the residential architectural conservation area.

This submission asks An Bord Pleanála to consider and address the following concerns when deciding on the application:

- Home ownership and affordability
- Home size and mix
- Height, density and design

Home ownership & affordability:

Glasnevin is one of the few urban villages in Dublin City where there are homes of all sizes to meet most incomes from large Edwardian detached and semi-detached homes to more modest terraced, period cottages and ex-corporation homes.

Disappointingly this application provides zero affordable homes and as such presents no opportunity for average income earners to buy a home. This site is too strategically valuable to the city to allow it to be developed without providing any affordable homes.

The application seeks permission for 112 no. 1 bedroom apartments; 178 no. 2 bedroom apartments; and only 9 no. 3 bedroom apartments. Seeking permission to build 290 one and two bed units out of 299 increases the proportion of 1- & 2-bedroom units to 85% of the overall scheme. This is indicative of being designed for short term tenancies and investor leasing.

Seeking permission to build only 9 three bed units limits the possibilities for family ownership and occupancy.

In the past eight years there have been more than 8,000 purpose built single occupancy residential units granted planning permission and built in Dublin Central. Yet there have been zero new social or affordable family homes.

This application to more than double the number of apartments on the site and at the same time change the mix of unit sizes so that it is predominantly one and two bed units is inconsistent with and falls far below the established residential standard in the area.

There is an inadequate supply of three, four and five bed homes and a potential oversupply of purpose-built single occupancy units in Dublin Central.

An Bord Pleanála should condition any permission granted as follows:

- Minimum 10% of units should be affordable
- A more balanced mix of one, two and three bed units by increasing the proportion of three beds
- Add some four/five bed units as permitted under the previous permission

Height, density and design:

Height:

Proposed 5, 7 & 9 storey blocks are significantly higher than the currently permitted 4 storey blocks and totally out of character with the existing two storey streetscape

The 7 (20.2 and 20.6m) and 9 storey blocks (over 26m) breach the previously set height restriction of 19m height set for the Smurfit Site in the current Dublin City Development Plan 2016 – 2022 and as such are excessive and over bearing.

The proposed development is higher than the 5 & 6 storeys that were proposed in former application 3444/14 which Dublin City Council refused because they were considered to “represent excessive height” and would “materially contravene” the standards set out in the Dublin City Development Plan 2011 -2017 which was relevant at the time.

The site is higher than the adjoining roads therefore the 9 storey blocks would be 30m in height compared to the entrance. (For comparable purposes, the chimney is 34m high).

The proposed 7 and 9 storey blocks will negatively impact on residential architectural area and the chimney on the adjoining site which is a protected structure (RPS. Ref. 855).

The proposed 7 and 9 storey blocks will dominate the skyline, particularly when viewed from north of the site given the decline on Botanic Road.

Most of the photomontages have been taken at a significant distance from the site so the full impact on the streetscape is not accurately demonstrated or reflected.

It appears the photomontages have been created using a wide-angle format which has the effect of reducing the size of distant objects.

An Bord Pleanála should require the applicant to provide photomontages using a standard angle lens which would show the true height impact from all adjoining roads, north, south, east and west of the site and make them available for public review and comment.

The proposed 7 and 9 storey blocks will negatively impact on the development of the northern half of the Smurfit Site and significantly restrict the ability of southern light to reach those buildings.

The applicant states that due to the proposed heights of some of the blocks, some of the lower floors will be negatively impacted in terms of daylight and will result in several apartments not achieving ADF (average daylight factors) requirements. An Bord Pleanála should not grant permission for homes that fail to achieve average daylight factors.

Given the height of the buildings and the distance between them, there is the potential for wind tunnels to be created. The 4 central blocks (B – E) will be 21.6 – 22.1m apart. For the two highest blocks, this will mean that the distance between them is less than the height of the blocks, leading to the potential of a wind tunnel.

The applicant has prepared a wind analysis which shows that “Small areas were suitable for business walking and cycling, and three areas were not suitable for pedestrian use.”

There was found to be high levels between Blocks C & D which is also the location of the main public open space, thereby limiting its use.

The wind impact on the neighbouring roads does not seem to have been carried out.

An Bord Pleanála should not grant permission for a development with open public spaces that are not suitable for pedestrian use or which have the potential to create wind tunnels.

The proposed height together with its proximity to the north boundary will significantly impact and limit any potential development on the northern half of the site.

As the current proposal is located south, the proposed 7 and 9 storey blocks would significantly reduce the ability of a future residential development on the northern part of the site to achieve enough daylight. This would result in a very incohesive development across the two sites.

An Bord Pleanála should condition any permission for development to no more than four storeys which is in-line with standards set in the city development plan and planning permission previously granted for the site.

Density:

The current planning permission to build 76 apartments and 43 houses across 3 blocks with the maximum height being 4 storeys, providing a total of 119 units on the site.

The applicant is seeking permission to construct 299 apartments in addition to the existing 35 houses which would result in a total of 334 homes. The applicant is proposing to not build the eight houses for which permission was previously granted.

The applicant is seeking permission for an increase of almost **4 times (3.93) the number of apartments** currently approved.

The 2016 census identifies housing density ie. Number of housing units per hectare in established existing residential Iona Area as **29 per hectare**. This application is seeking approval to construct

165 units per hectare which represents more than **5 times** the established current density. By any standard this is excessive, totally inconsistent and out of character with the established residential architectural conservation area.

In deciding on this application An Bord Pleanala should apply conditions to ensure that the development delivers high density, as already approved, and does not result in over development as is proposed.

An Bord Pleanala should condition any permission granted to allow for development in line with the current permitted development i.e. **58** units per hectare which is almost double the established density in the area.

Design

The following design elements are out of character with the existing architectural residential conservation area

- Zinc cladding on the top floor creates an office/commercial like appearance to the development
- Long-form red brick cladding is not in keeping with the residential architectural area and if deployed on the proposed scale and height would be incongruous.

An Bord Pleanala should condition any permission to require quality materials in keeping with the residential area are used.

The application allows for only 10% of the site to be allocated on a dispersed basis as open public space. This is an unsatisfactory level of open space for a development of this size in a built-up urban setting. The practical use of the open space is questionable due to the dispersed allocation of that space.

An Bord Pleanals should condition any permission to increase the area allocated to open public useable space.

I thank An Bord Pleanala for considering the points raised in this submission.

I urge the board to condition permission for development of this important site to guarantee affordable quality residential development consistent with the established residential conservation area.

Sincerely,

Mary Fitzpatrick