

Neasa Hourigan TD Leinster House Kildare Street Dublin 2

Strategic Housing Unit An Bord Pleanála 64 Marlborough Street Dublin 1 D01 V902

29th June 2021

Re: Case No. 310327: Former O'Devaney Gardens Site and lands previously part of St. Bricin's Military Hospital, Dublin 7. (www.odg-shd.com)

Dear Sir/Madam,

We wish to comment on the above planning application on behalf of Neasa Hourigan TD, Cllr. Janet Horner, Cllr. Darcy Lonergan.

We welcome plans to develop this site, a site that has been derelict for far too long. There are however a number of issues we have with the current application that we would like to see addressed in any grant.

We include below our observations on this planning application, and have submitted the required fee.

## Residential Amenity

We note the concerns raised by An Bord Pleanála with respect to the daylight penetration to the courtyard amenity spaces and ground floor level units. We also note that the applicant claims to have met the related *qualitative* requirements of the Apartment Guidelines (2018).

The development as proposed contains significantly more units than 824 homes proposed to Dublin City Councillors in November 2019. An Bord



Pleanála needs to ensure that this additional density does not result in poorer quality housing provision even if that results in conditions requiring a reduction in the heights of some of the blocks.

## Permeability

We welcome the fact that permeability through the site will be promoted. A site this large cannot be left as a monolithic block that needs to be navigated around. We are however concerned that the on site road network as designed may result in the site being used as a rat-run for vehicular traffic. This may be especially evident when BusConnects is introduced, especially the bus gate in Stoneybatter.

The preliminary plans for the development at Clonliffe College included a vehicular gate that would prevent rat-running through that development while allowing residents/authorised vehicles pass through where required.

We would ask An Bord Pleanála to consider a condition to require interventions to prevent rat running.

## Active travel

We note that in the Traffic and Transport Assessment the applicant seeks to "to encourage walking and cycling". Given the vehicular traffic though the site:

- The lack of segregated cycle lanes is a serious omission. Simply painting bicycles on the road will do little to encourage cycling.
- There is a lack of pedestrian crossings on "The Boulevard" especially opposite the "Central Park".
- We agree with DCC Recommendation 3 that consideration should be given to the provision of bicycle cages with a smaller amount of spaces. A single area with 236 spaces is difficult to secure given the large number of people that will need access.
- The applicant states that visitor cycle parking "shall be sheltered where possible". Our view is that making bicycle parking sheltered is a straightforward task and that all cycle parking on the site should be sheltered.

## Accessible car parking provision

It seems that the applicant has chosen to provide fewer than the required number of accessible car parking spaces in the undercroft and more than



the required number of accessible car parking spaces on-street with the net result being that overall the minimum requirement is met.

However, our understanding is that the external parking is visitor parking. If this is the case the development discriminates against residents with a disability as there are fewer spaces for residents with a disability than the minimum would dictate.

We would ask An Bord Pleanála to consider a condition that requires that a minimum of 5% of parking spaces would be available to residents with a disability.

Kind Regards,

Neasa Hourigan TD, Dublin Central

Cllr. Janet Horner, North Inner City

Cllr. Darcy Lonergan, Cabra-Glasnevin