
Neasa Hourigan TD
Leinster House
Kildare Street
Dublin 2

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

5th August 2020

Re: Case No. 307463. 240 no. apartments, childcare facility and associated site works. Daneswell Place, Former Printworks.Smurfit Site, Botanic Road, Glasnevin, Dublin 9.

Dear Sir/Madam,

I wish to comment on the above planning application on behalf of myself, Neasa Hourigan TD, and Cllr Darcy Lonergan [and the below local residents].

It is our desire to see the site developed in a manner appropriate to the location. The city continues to need more quality accommodation. There are however a number of issues we have with the current application that we feel need to be addressed prior to development.

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

1. Height

There are a number of issues with the current height of the development:

- The height contravenes the 19m limit in the area's development plan
- The height of the proposed development with two blocks at six storeys and two at seven storeys is out of scale with the nearby residential homes (primarily two storey). The setbacks and tapering

referenced in the application do not change the primary size of the blocks in question.

- While it seems An Bord Pleanála (“ABP”) may grant permission to a strategic housing development that contravenes the local area development plan there is no obligation on the Board to do so. While the application makes many arguments for increased density many of these arguments would be satisfied by the 4 storey heights proposed in the extant permission on the site. APB needs to consider whether it is wise to allow broader plans such as the National Planning Framework to override more granular local development plans.
- The application makes reference to the site being located within 300m of the planned Glasnevin stop on the Metro link route as a rationale for breaching the area plan height guidelines. The application itself says “located within 500m of a planned or existing rail hub”. While it is our hope that the Metrolink preferred route goes ahead it is unwise to rely on infrastructure that is still in a pre-planning phase.
- The overall site size is not in keeping with the architectural heritage locally including: The John Player building; the Alexander Strain built housing; Glasnevin Cemetery.
- While the height of the development is an issue in itself it must also be considered in terms of the adjoining streets. At a 25m¹ elevation above sea level the site, while roughly level with Iona Road/Park, stands significantly higher than Cliftonville Road (19m) and Marguerite Road (21m).

2. Density

The density of the development represents an overdevelopment of the site with respect to the density of the surrounding area.

The absence of a master plan for the combined Player and Smurfit sites means the density represented in this application is not a full picture of the development that will occur in the area.

¹ Measurements obtained from online elevation tools based on Google Maps.

That aside the application for 275 units (35 houses, 240 apartments) represents a significant increase on the extant planning permission for 119 units (76 apartments and 43 houses).

3. Mix

With just six three-bedroom apartments (2.5% of the apartments) we feel that this is a significant change to the long term residential tone of the area. A mix more suited to family living would be more appropriate.

4. Private Open Space

Consideration should be given to the provision of additional Private Open Space in light of the COVID-19 pandemic. It seems that working from home will become more the norm and it is important that we plan for this with better accommodation of Private Open Space.

5. Parking

With just eight surface level visitor car spaces it seems that the surrounding residential areas will be forced to absorb the overflow from: creche drop offs and pickups; cafe visitors; medical consultant visitors; visitors to the apartments.

6. Phasing

The developer has not yet developed the housing granted under the existing permission. Any grant of permission should include enforceable conditions on the phasing of the development.

7. Social Housing

Our preference would be to see social and affordable mixed into development rather than all units together in one block. Currently all Part V apartments are on the lower floors of block A.

I hope that you will take these observations into consideration.

Kind Regards,

Neasa Hourigan TD, Dublin Central

Cllr. Darcy Lonergan, Cabra-Glasnevin