

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

25th May 2021

Re: Case reference: PL29N.310082: Nos 42-44 (including the former Quinns Public House), 46, 48, 48B, 50 and 50A Drumcondra Road Lower, Dublin 9 (including a laneway access connecting to St. Joseph's Avenue) (2187/21)

Dear Sir/Madam,

I wish to comment on the above planning appeal. I made an observation on the initial application to Dublin City Council and I concur with its determination on that application.

I include below my observations on this planning appeal, and have submitted the required fee.

## **1. Pre-planning consultations**

The appeal makes a number of references to feedback provided during the pre-planning consultations. The appeal itself notes that pre-planning consultations cannot prejudice the outcome of the planning determination. As such these references to the pre-planning consultation feedback should be ignored. To do otherwise would unnecessarily constrain any future pre-planning consultations

## **2. The introduction of “layout 2” option**

I do not feel it is appropriate to introduce a new layout option during the appeal process. The planning application was of great public interest. This fact can be evidenced by the large volume of observations received. That original application was well advertised through the statutory means. The

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appeal however is less well advertised. As such I feel that to introduce markedly different designs at this stage may undermine the faith people have in the planning process.

I also believe the grounds for introducing this second option are not valid i.e. *"As the Planning Authority appear to have changed their opinion"*. Per point #1 the pre-planning consultations do not represent an opinion from the planning authority.

### 3. Vacant site

The appeal seems to say that, in the midst of a housing crisis, we should bypass the good planning process (e.g. the provision of daylight amenity for No. 52 Drumcondra Road Lower) rather than leave a site vacant.

This is an disingenuous observation and should be disregarded. Were the housing crisis of such importance to the owners of this land the site would not have sat vacant for so long. Were the housing crisis of such importance development could have commenced at any point under the planning permission granted in 29-Mar-2017 (3999/16).

### 4. Flawed policy development plan

The appeal puts forward the argument that the policy CHC1 (preservation of built heritage) of the Dublin City Development plan is *"unlawful"*. While it is agreed that the Quinns site is not part of the Record of Protected Structures it is nonetheless part of the built heritage of the area. Any developments need to be congruous with that built heritage.

### 5. Partial survey

The planning officer's report mentioned that the architectural heritage impact assessment "includes only a partial survey of the building". My observation on the planning appeal stated that the Architectural Heritage Impact Assessment report does not cover the retained facade from 46-50 Drumcondra Road Lower. I see no resolution to this issue in the appeal.

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I hope that you will take these observations into consideration.



Kind Regards,

Neasa Hourigan TD, Dublin Central