



**Cllr. Roderic
O'GORMAN**
Dublin West

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.
14/10/19

Re: Strategic Housing Development application on site of Brady's Public House, Old Navan Road, Blanchardstown - SHDW/016/19

Dear Sir/Madam,

I would like to make the following objection to the planning application for a 210 bed-space 'co-living' development on the site of Brady's Pub that has been submitted by Bartra Capital Property Ltd – application number SHDW/016/19.

I enclose the prescribed fee of €20.

Yours sincerely,

Cllr. Roderic O'Gorman

Inappropriate Application of 2018 Guidelines

The 2018 Ministerial Guidelines (Design Standards for new Apartments) are absolutely crucial to this application. They allow for both the co-living model, but also for the reduced or in this case completely removed carparking provision that this application is based on.

Section 4.19 of the Guidelines talks about the removal of a requirement for parking at "... highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such as rail and bus stations located in close proximity". Section 4.20 states "These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes

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walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops”.

This proposed development is not in the city centre. It is not adjacent to the city centre. As such, the proximity of the commuter rail station at Castleknock has to be the key element seeking to justify reliance on this section of the Guidelines.

At the Fingal Castleknock/Mulhuddart Area B committee meeting in early September 2019, the councillors received a detailed presentation from Irish Rail, which stated that there will be no significant increase in capacity on the Maynooth line until 2025 – 6 years away. At that point, a sustainable argument about high capacity commuter rail can be made. But neither currently, not within the next few years, will there be a substantial increase in capacity on the Maynooth line. I would submit that at very best, this site more closely matches the definition of 4.21 – an Intermediate Urban Locations – where there is a requirement for at least some parking.

I would also draw the Board’s attention to section 4.23, which stated “For planning applications across all types of location, where it is sought to eliminate or reduce car parking provision, it is necessary to ensure, where possible, the provision of an appropriate number of drop off, service, visitor parking spaces and parking for the mobility impaired. Provision is also to be made for alternative mobility solutions including facilities for car sharing club vehicles and cycle parking”. It should be stated that in this application, there is no provision for visitor parking or mobility impaired parking. As such, this application clearly does not meet these elements of the guidelines.

15 Year Covenant Stipulation

This Application states that the living units in the development must remain as co-living units for 15 years following the construction, as per the 2018 Guidelines. A draft covenant is provided with the application. Both the Guidelines and the applications are completely unclear as to what happens once the initial 15 years are passed.

In the recent grant of permission by An Bord Pleanála for a co-living development at Eblana Avenue, a condition was imposed that at the end of the 15 years, the owners would have to tell the planning authority what would be the future management system for the building and that any changes to its use would require a planning application.

This provides only very limited protection. There is no national statutory framework for the legal structures necessary to support a co-living arrangement. The condition applied to the Eblana Avenue development makes no provision for a breakdown in the ownership or organisational structure of a co-living development.

Lack of Sunlight into basement and ground-floor rooms

I would be deeply concerned about the low levels of sunlight being received by the 14 rooms accessing the basement courtyard and the 8 rooms accessing the ground floor courtyard. The

Daylight and Sunlight Analysis submitted by the applicant argues that the proposal meets the requirements of the BRE Guidelines, but also accepts that the ground-level courtyard falls short of what is required.

It is vital that in assessing the level of light received, the Board is conscious of the fact that for many of the potential residents of this development, their room will be their sole private space. These are not normal apartments where you can move around to other rooms. The common spaces may not appeal to all residents, they may not like some of the other residents etc. In these circumstances, some residents may end up spending lengthy amount of times in their rooms. As such, I would call on An Bord Pleanala to be particularly conscious of the importance of sunlight reaching individual private rooms for a significant period each day. In applying the BRE guidelines, the Board must be conscious that they are not dealing with a typical one bed apartment, where there would be at least two windows. Rather, the rooms in this development have only a single window.

The Proposed Building is Overdevelopment

An Bord Pleanala previously gave permission for a 36 apartments at this location, reducing the original application from 44 units (FW16A/0079). That development was, primarily a 3 storey building, with one element going to four storeys. This current application is dramatically larger, both in terms of height, but also in terms of the footprint of the actual building within the perimeter of the site. I would strongly argue that what is proposed constitutes overdevelopment of a suburban site in the middle of traditional residential housing estates.

I would draw the Board's attention to a recent decision of Dublin City Council regarding a co-living application at Harolds Cross Road (3592/19) where the Council refused permission in September 2019). One of the reasons for the refusal was that the

“... proposed development would constitute overdevelopment of the site and would have an excessively overbearing effect on adjoining properties. The proposed development fails to integrate or be compatible with the design and scale of the adjoining buildings and as a result, would seriously injure the visual amenities of the streetscape”.

I would urge the Board to make a similar finding of overdevelopment in respect of this particular application.

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