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Planning submission on Holy Cross College Strategic Housing Development

19 August 2021

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We have submitted the following planning observation to An Bord Pleanála in relation to the Holy Cross Strategic Housing Development on Clonliffe Road:

RE: TA29N.310860

Planning application in respect of

Holy Cross College Strategic Housing Development (SHD)

To whom this may concern,

I write regarding the proposal to construct 1,614 mostly "build-to-rent" apartments along with a retail outlet

This development has been applied for as a Strategic Housing Development under the Planning and Development Housing and Residential Tenancies Act 2016 and falls under the decision-making purview of An Bord Pleanála.

I would like to begin by stating my view that this site must be used to provide housing. In the context of a housing crisis both in our city and in the country at large, it is vital that sites such as this be converted into space for new homes. However, it is just as vital that the homes constructed are sustainable, high-quality and affordable. These homes must also be integrated meaningfully within the existing community and provide real options for people to put down roots and live in the area long-term if they wish.

From many conversations with local residents on Clonliffe Road and throughout Drumcondra and Ballybough, it is clear that there is a broad consensus in favour of the development of good-quality housing on this site. We have a clear common opportunity and responsibility to ensure these lands are developed in a way that produces a sustainable, thriving community in which a vibrant mix of individuals and families can make a home for themselves. We must also ensure that the site continues to provide communal green space for the entire community so as to preserve and promote both quality of life and a meaningful sense of a shared community between residents old and new.

I am therefore submitting the following observations with a view to encouraging An Bord Pleanála to consider the many ways in which the existing proposal should be improved in line with the objectives set out above. To approve the plans in their current condition would, in my view, represent a considerable lost opportunity in terms of developing Clonliffe Road as a community in which a far greater number of people can live, work, raise their children and ultimately grow old.

I would ask An Bord Pleanála to consider the points raised below before coming to a decision on this proposal:

1. Density and Development Model

This site represents a prime opportunity to develop what amounts to a new, sustainable village within the existing community. However, the current plans seem more focused on creating a primarily short-term living space with a high rate of turnover, as those taking up residence in the area will mostly be couples and single individuals without the ability to raise families within the planned accommodation.

The planned breakdown of units also gives cause for concern, with more than 70% of apartments being either one-bedroom or studio units. Of 1,614 total units, only 418 are two-bedroom and just 53 have three bedrooms. This severely reduces the scope for long-term residents to put down roots in the area, as the overwhelming majority of apartments are not suitable for family living. Considering the size and impact of this development, which essentially amounts to a new neighbourhood being created within Drumcondra, it is both unwelcome and unwise to so limit the possibilities for residents to raise children and grow their families within the area.

This approach, which seems geared towards prioritising shorter-term individual tenancies over building longer-term communities, is certainly tied up in the nature of the “build to rent” development model. With the exception of two Part V social housing buildings, the development is entirely “build to rent” with no opportunities for residents to own a meaningful stake in their homes. It also bears noting that by restricting all planned social housing into two blocks, distinct from the rest of the development, these plans will inevitably need to a divided and socially segregated community

In short, rather than being driven by the long-term needs of the community, the development of a community which is effectively entirely “build to rent” will inevitably be guided by the owner’s prerogative to maximise return on investment.

In practical terms, this has meant an unacceptable level of density within the proposed development, driven by the opportunity of a greater overall number of individual tenancies. Existing “build to rent” standards allow for smaller units than would be permissible in a “build to sell” development: therefore, while most of the proposed units exceed the minimum size standards for “build to rent”, very few (less than 20%) of these apartments will exceed the higher size standards of a “build to sell” apartment.

Rather than developing a sustainable community in which new residents can put down long-term roots in Drumcondra, these plans effectively lock in a short term, profit-oriented “build to rent” model forever.

In addition, the proposed development consisting of 12 blocks of apartments ranging from 2 to 18 storeys is a significant material contravention of the Dublin City Development Plan (2016-22). There is no valid justification for high rise at this site as the two tallest buildings consisting of 13 and 18 storeys add less than 16% of units to the development.

2. Quality of Apartment Design

This observation has already commented on the non-ideal reality of the proposed development, whereby the “build to rent” nature of the project has led to smaller apartments than would otherwise be permissible. Furthermore, this overconcentration of single-bedroom and studio units appears to produce undesirable elements to apartment layout as ways must be found to insert such a large number of small units into each apartment block.

It appears from the plans that a number of studio apartments, of the types 0D and 0E in particular, are proposed to have an almost entirely internalised bedroom with questionable access to light. In many of the single-bedroom apartment plans, access to bedroom light appears to come through an internal window with negative implications for ventilation and privacy.

Within several of the proposed two-bedroom units, the second bedroom also appears to be inordinately narrow. This is particularly the case in the Part V social element of the plans. Overall, there are far fewer two- and three-bedroom units than has been set out as standard in Dublin City Council’s Development Plan (29% of total units in this development vs. a DCC standard of 70%).

The unusual concentration of smaller units also has unwelcome implications for the shared internal spaces within each apartment block. For instance, the plans indicate a significant number of lengthy, windowless internal corridors, as long as 70 metres in the most extreme case.

Again, it appears the long-term liveability of the development is being overlooked in favour of maximising the number of small apartments and studio units which can be constructed. As previously mentioned, the construction of apartment blocs based around the desire to create a high level of smaller units makes it difficult (or perhaps impossible) to revise these layouts in future. This is particularly striking where we could be building high-quality apartments with sufficient space for families and a pleasant shared environment.

3. Amenities and Access

In general, there are further concerns about the level of access for residents of the proposed development. The very high level of planned density means that, in effect, a new village would be constructed within an existing community. Consideration must therefore be made for the impact this will have on existing amenities and on whether enough has been done to provide and promote essential services to residents. At the end of the day, any development on this site must make considerable efforts to integrate its residents with the existing communities that surround them. No development of this nature can exist as an island within the area.

In particular, in reviewing the plans it becomes clear that more must be done to mitigate the impact of this proposed development on traffic congestion within the area. Clonliffe Road and the surrounding parts of Drumcondra and Ballybough are already experiencing considerable issues with car traffic and ongoing parking problems, which impact directly on both the accessibility and liveability of the area. The addition of a new development of as many as 4,000 people without matching investment in sustainable local transport or adequate parking facilities could have a disastrous impact on both the new and existing members of the community.

Steps must be taken to avert a spill over of private vehicles into neighbouring areas, and there must be sufficient access points to and from the development so as not to completely overwhelm any one particular street or road. In all of this, it is worth remembering that Clonliffe Road already endures a huge amount of vehicular traffic and does not even have a dedicated cycle lane at present. Questions must be asked as to how a new development on this site could contribute towards limiting the concentration of vehicular traffic rather than adding to it.

Furthermore, there is a vague unspecified commitment to a bridge across the Tolka River. While this would be a welcome addition, issues of access and permeability need to be clarified. If planning is to be granted, there must be clarity as to the form the bridge will take and the impact on the adjoining community.

4. Public Right of Way to Holy Cross Lands & Tolka River

In considering this planning application, An Bord Pleanála should be mindful of the fact that local residents have had a right of way through the Holy Cross lands for decades. Local residents could always enter by Clonliffe Road, traverse the grounds, exercise their dogs, have a picnic and stroll along the Tolka River.

Local residents are concerned about the privatisation of traditional publicly accessible lands and the reduction of amenities in the area. While we welcome that commitments have been made in respect of public access to the grounds, it is vital that there should be no diminution of the residents' traditional rights and access to the lands by virtue of this development.

5. Environmental Concerns

There have always been major problems with flooding and sewerage back up in the low-lying Clonliffe area and because of the Tolka River and its estuary in the vicinity. The water and drainage systems are reliant on old Victorian pipes many of which are in need of replacement. Residents on many of the surrounding streets have complained about poor water-pressure and sewage. This issue is left entirely to the local authority. Considering the extra pressure this huge development will place on drainage and sewage in the area, there should be a requirement for the developer to conduct a survey and address the problem in advance.

6. Construction Management

liaison committee be established between the builder and the local residents to address issues of demolition, removal of spoil, dust, noise, etc. as they will assuredly arise from time to time.

It is my sincere hope, and the hope of many local residents, that the opportunity will be taken to develop the Holy Cross site with the type of sustainable, affordable housing our city so badly needs. I do not believe that the "build to rent" model is set up to provide this, and I urge An Bord Pleanála to closely consider whether a sustainable community can truly be delivered under the plans proposed here.

In the event planning permission is granted for this development in its current form, I call on An Bord Pleanála to attach such conditions as would address as many of the issues raised in this observation as possible, for the sake of both the long-term sustainable development of the local community and the quality of life of its future residents.

Yours sincerely,

Senator Marie Sherlock

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