

Michael O' Neill (O'Neill Quigley & Associates)

RE: Initial Comments re GG_CC_Masterplan_2_Oct_2008.pdf

Date: 12th October 2010

Dear Ronan,

Herewith our initial brief comments in relation to the scheme.

1. The overall scale of the buildings seems just fine and non-threatening while maintaining huge oversight of all public spaces.

I approve of the extended use of the "civic square" element as organizer to a dispersed campus - I use it in a smaller scale on my work.

2. However there is too much unbelievable green in the presentation - I could have done without much of it, particularly the graphic plans.

Showing wall-to-wall trees in the squares means that the nature of the spaces has been misunderstood by the planners in favour of graphic "wow" factor.

The scale of urban spaces should be mitigated and translated towards human scale by intermediate elements like trees - they should not dominate them like this.

3. The organization of the scheme needs a vertical element(s) to help with orientation in what is a non-orthogonal layout, serpentine in nature.

This vertical feature(s) may or may not incorporate a viewing platform, and would have a tourist/visiting lecturer/visiting student complementary end use.

Much is made in the presentation of the views of the Dublin Mountains to the south, but without high points other buildings and trees will block most of these views.

4. I would be very wary of the current trend towards a minimum scale of eight stories in Dublin City Council - the seem to have no clue of scale.

Eight stories is the largest London scale and they have commensurately wider streets to compensate for it - height without width is very oppressive.

One or two of the squares at the north of the site need to be looked at with this in mind, where building almost meet - a balance needs to be struck here.

5. While the whole thing is an expansion or relocation of facilities from elsewhere, I feel the potential for expansion is limited and will mainly be vertical or take over the sports field.

Long term we have to view this not only in a ten but a twenty year timescale - if Dublin resurges again to a centre of academic excellence, how do we address the limitations of the site.

Going against everything I have said above [balanced constructive criticism is where we are at :)] it may be better to build higher, or build more basements and leave more land for later use.

Just some initial thoughts and thanks for asking - kudos all round for an appropriate level of presentation with evocative sketches and simple elegant plans [apart from the green!].

Yours sincerely,

Michael O'Neill for
O'Neill Quigley & Associates
Planning & Design Consultants

Dip.Arch. DIT, B.Arch.Sc. TCD (1990)

John Thompson (private individual)

Greeting,

First of all, as a local resident of Broadstone and a graduate of DIT I am very much in favour of the new development, and am happy to endure inconveniences related to construction works etc. should the full vision be ultimately realised

DIT has always been a poor cousin within third level education in Dublin because of the lack of facilities and the wide dispersal of the staff and student populations. Gathering all of its many elements together in one site is a fantastic prospect. The north inner city area around Broadstone, Phibsboro and Stoneybatter is desperately in need of social and sporting facilities, particularly playing fields and a swimming pool, and community focal points such as a theatre and library.

The addition of the Educate Together primary school to the site will bring vitality and wide community interaction to the project and provides a valuable option for parents who would prefer their children be taught in a secular environment. The prospect of the facilities of the whole campus being available for occasional school use are also exciting.

One obvious question is where the pupils will go afterwards? As the present primary students grow older, parents are certain to lobby strongly for the provision of a similar type of secondary school. On a site as large as Grangegorman, it makes sense to make provision in the plan (at least in terms of space and services) for the potential/inevitable future development of a second level school, ideally proximal to the planned primary school. At present there seems to be no such allowance made.

This is the only glaring omission readily apparent to me in the current plan, which otherwise appears impressively comprehensive and creative in both vision and detail, and I would imagine that I am not the first or the only person to draw attention to it.

Regards,

John Thompson

Gwen Turner (private individual)

Hi,

Thanks for circulating the Grangegorman plans – it looks very exciting.

I only have a few points that I'm sure have been considered already – but thought I'd flag them in any case:

It would be great if as far as possible, the whole campus was accessible to wheelchairs & people with buggies – with as few steps and kerbs as possible – especially in and around the primary school and HSE buildings.

It would also be good to have designated cycle paths all across the campus – so that cyclists aren't cycling on footpaths – and to have lots of bike parking areas on site – with covered bike parking at main points of entry.

In my view, escalators within the buildings should be avoided or minimised where possible – as they demand a lot of energy to run, are prone to breakdown, and don't serve as a safe staircase when they are switched off. Stairs, Ramps and lifts would be better alternatives.

Will there be some sort of storage unit for consumables? If so, it could be located near some sort of service entrance so that lorries are not making trips into the centre of the campus.

Finally, some consideration should be given to the location of student lockers. Large banks of lockers on corridors (as in Bolton St) are unsightly, and lead to congestion as people are walking through the hallways between lectures whilst others are trying to get stuff in & out of lockers. Smaller groups of lockers placed throughout the building in less busy areas (similar to TCD Arts Block) would be better. Also, the size of the lockers available should be tailored to the types of students – with trades students needing more space for tools, safety gear, boots, etc.

Thanks for the opportunity to contribute.

Regards,

Gwen Turner

Tom Farrell (private individual)

A very simple submission in regard to staff and student access to the Grangegorman site. There aren't any recognisable bus routes from North South or West which pass less than a mile from the centre of the site. Connolly, Heuston, Tara st and Drumcondra stations are up to 2 miles away and the Tallaght Luas is about a mile to the centre of the campus. Staff and students will have a very long walk from their stops, compared to current distances from Cathal Brugha, Bolton, Aungier and Kevin Sts. There will be minimal car parking available for staff, and no indication if the car parking will be free to staff or will be a charged. The idea of 10 to 20 000 staff and students in cars all trying to get up the Grangegorman road at ten minutes to nine would not require a computer model to figure out the consequences.

My suggestion in this regard is that DIT undertake to extend the Dublin Bikes scheme specifically for staff and students, by contracting with Dublin bikes to provide 2000+ bikes with stands at all the main bus and rail and luas termini and operating in a manner which would prioritise those bikes for dit use, while making the surplus available to other commuters. Also the DIT could contract to supply a number of feeder buses to round robin the transit stops in opposite directions, departing every ten minutes at peak. Using a circular route from Grangegorman to Phibsboro, Drumcondra, Connolly/Busarus, Tara st, Pearse, Stephens green Luas, Heuston, Smithfield Luas and back to Grangegorman, and the same route in the opposite direction as far as is possible.

Like most other members of staff, I have no idea how I am going to get to Grangegorman other than by walking for 30 or 45 minutes each way each day from Drumcondra or Connolly station, the latter option allows me to use the Luas, but my journey time will still be as long as the Smithfield Luas stop is still 20 minutes from the centre of the campus, plus the extra journey time from Drumcondra station to Connolly station and then the wait for the Luas, most of which now depart from dockland, requiring a longer walk from Connolly to the nearest stop. My current walk is 10 to 15 minutes depending on station, so the move to Grangegorman will double or treble that. Bikes and buses are the only way, the car option is of limited use given the inaccessibility of the site. UCD has a motorway flyover as part of its access. grangegorman is surrounded by cobbled lanes.

Thomas Farrell

George Henry (CIE)



RECEIVED
15 OCT 2010

Mr. Ronan Doyle,
Communications Officer,
Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7.

Córas Iompair Éireann
Group Property Management

Oriel Street
Dublin 1
Fax: +353 1 703-2930

Enquires to:

Tel: 7032924

Date: 12 October 2010

Our ref:

Your ref:

Re: Grangegorman Draft Strategic Plan 2010

Dear Mr. Doyle,

I refer to your circular letter of 23rd September seeking submissions in respect of the above Draft Strategic Plan on or before 9th November 2010.

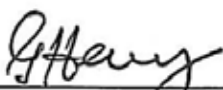
As you will be aware, CIE, Dublin Bus and Bus Éireann have been engaged in extensive discussions with your Agency regarding the impact of the Grangegorman scheme for a number of years now. These discussions entail both the property implications of the scheme and also the transport and operational aspects affecting the bus companies located in the adjoining Broadstone HQ and Phibsboro bus garage. Furthermore we contributed to the costs of a separate study examining the potential for creating a public transport interchange at the Constitution Hill entrance, or Grangegorman Gate as it is referred to in your Strategic Plan. Separately you might note that the recently lodged application for a Railway Order for LUAS line BXD is on the basis that LUAS will cross Constitution Hill at grade, not on a bridge. This will have implications for the design of an interchange.

These discussions were not concluded, and we look forward to engaging further with you and with Dublin City Council in order to achieve an integrated plan to optimise access and transport facilities to the new health and education campus. In that regard, and for the sake of accuracy I should draw your attention to the fact that the layout to the front of the former Broadstone Station building shown in Section 4.10 Masterplan Design Concept has not been agreed with the parties. Whilst we acknowledge the aspiration set out in Section 5.8.2, we would point out that proposals for the location of a possible inter-modal transport interchange should not be confined to the Broadstone site only. The area in front of the Broadstone building, owned in part by DCC, as well as the Grangegorman lands, should also be considered in that regard.

The Masterplan precludes public transport providers gaining access to the new campus. Whilst we acknowledge the benefit of creating a "traffic cell" for this area, the design of such cell can provide for through running of buses without adversely impacting on a pedestrian friendly environment such as that proposed. Dublin Bus may make a separate submission to you in that regard.

CIE fully supports the Draft Plan, and welcomes the opportunity to contribute further to the formulation of the final Strategic Plan so that it will fit in seamlessly with the city's infrastructure, and provide the optimum public transport facilities for the patrons of the new DIT campus and health facility.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'G. Henry', written in black ink.

George Henry
Deputy Property Manager

Richard Dunne (private individual)

Hello

As a runner , a slow runner i might add. I see that no track is in the plans for the sporting area in GG. There is enough space for one . You could incorporate it into the football pitches. TCD has one of the oldest grass tracks in the world.

Its only used for about 7-8 months of the year. In those months its used every day by many different groups be it runners footballers, all sports can use a running track , but only footballers can use a football pitch. I see a running area is being looked at in the plans. This will not be used if others are crossing over it, using it as a walkway etc.

A track also open the possibility of hosting a race. I am a member of Business Houses Athletics Association BHAA. There are races hosted by companies all over Dublin. TCD have a great race every summer which has been held for some 25 years. IF you put in a syntactic track You could rent time out to local clubs etc and would create a revenue stream

It would be great to get a race going in GG over the next year or two to promote DIT in GG and to start getting some mixed use of the area. We would need showers , changing rooms etc before hand Below are some links to photos from the last tack race in TCD and to the BHAA website

Best Regards

Richard Dunne

Jimmy Kinahan (Private Individual)

Subject: RE: Consultation on draft Strategic Plan

Thanks for your note Ronan.

I am unhappy with the amount allocated to mental Health (surprise again!) along with the % portion of land allocation.

I am not at all pleased that the donation of the land from the mental health budget and only a proportionally small percentage given over to the care of the most vulnerable.

As I am not attached to any group I guess it want make any difference.

Regards

Jimmy Kinahan

William McCarthy (for St.Brendan's GAA club)

Subject: Submissions and Strategic Plan

A chara,

St. Brendan's GAA club would like to make a submission to be included in the strategic plan. We note that under Section 4.4.16 of the Strategic Plan that it is proposed that there will be a Gallery Passage which will include information on a wide range of topics such as the history of the Grange Gorman site, history of the DIT and the HSE. We would like to also have a display in the gallery on the history of St. Brendan's GAA club and would be grateful if you could confirm if this is in order.

Regards

William

Mary J Gantley (private individual)

Subject: submission on plans

To whom it concerns

Having viewed the draft strategic plan for Grangegorman Development I wish to make the following brief comments- I consider the area to be developed is high density unsuited to the area.

The proposed high rise buildings are obtrusive and not in keeping with the existing character of the area.

From the proposed plan it appears that it will require the removal of a large portion of the existing mature trees.

As I live on Rathdown Road I object to the view from my house being overlooked by commercial/residential developement.

Yours sincerely,

Mary J.Gantley



October 2010

GoCar Submission on the Grangegorman Strategic Development Plan

GoCar
Fingharden
Co. Tipperary
Ireland
telephone 1890 440 227
info@goCar.ie
www.goCar.ie

We welcome this opportunity to comment on the Strategic Plan for the development of lands at Grangegorman.

1 What is GoCar?

GoCar has been operating in Dublin City since 1 September 2010 with two low emission diesel powered GoCars at its first GoBase (car station) off Camden Street in Dublin 8.

GoCar has been operating in Cork City for two years since its launch by Noel Dempsey TD, Minister for Transport, in September 2008. There are now 7 low emission diesel powered vehicles in service: 5 Ford Fiestas, one Ford Focus and one Ford Transit Connect (small van). They are based at 4 GoBases in the City Centre, near City Hall, The Court House, UCC and Kent Station.

GoCar is operated by GoCar CarSharing Limited, a wholly Irish-owned company, in partnership with Cambio Mobility Service, which has 20 years experience of operating such services and currently supports and operates services in 11 cities in Germany and 20 cities in Belgium. It has provided back office booking and billing software systems, technical and call centre support and consultancy for GoCar. There is also a co-branding agreement between GoCar and Cambio.

GoCar is the first company to introduce the CarSharing concept to Ireland. CarSharing is rapidly replacing the model of individual car ownership with its associated detrimental impacts throughout the urban areas of Europe and the United States.

2 What is CarSharing?

There are various terms being used in Ireland, but in Europe generally CarSharing means pay-as-you-go use of a vehicle, rather than lift-sharing or car-pooling. This is what we mean when we use the term 'CarSharing'.

A vehicle can be taken for a very short amount of time (usually from a minimum of one hour). The vehicles are parked nearby – often directly on the street – and so are very readily accessible a few minutes walk from one's home or workplace.

Customers receive a smart card when they sign up to a CarSharing scheme and this allows them to book and open any of the CarSharing vehicles for use. This usually allows CarSharing to be an automated process without the requirement of relying on opening hours and staff, etc.



CarSharing therefore provides convenient and cost-effective access to a car without the necessity of individually owning one. For further information see the video on the GoCar website, www.gocar.ie.

CarSharing operations have been running in many countries in continental Europe for about 20 years and in Britain and North America for about 10 years, and it is therefore a well-established system and concept.

Car Sharing provides the missing link for those who principally use transport modes other than cars. This means that those who would only occasionally use a car do not need to own one. By using a shared car provided by a CarSharing operator such as GoCar they only pay for the hours that they use the car and the distance travelled. This provides immense benefits to the city. It is estimated that the typical city car is used on average for no more than half an hour per day. Most city cars occupy valuable space that could more usefully be returned to the public realm improving the quality of shared spaces. CarSharing, where widely adopted, has been shown to remove the need for at least 10 ten cars. In the UK it is claimed that this number is in fact as high as 26.

3 CarSharing and the Environment

Evaluation of CarSharing has shown that it makes a positive contribution to the environment. Research elsewhere in Europe and in North America, shows that CarSharing reduces parking pressure, cuts out unnecessary car journeys and helps to combat pollution and congestion. CarSharing customers are more likely to walk and cycle, use public transport, and make lower levels of motorised travel than car owners.

In many cities CarSharing operators and public transport operators provide an integrated smart card and/or other financial incentives for their customers to seamlessly use both services. In Belgium, the state railway company is a shareholder in the national CarSharing holding company and the regional public transport operators in Brussels, Flanders and Wallonia are shareholders in the provincial CarSharing operation in their region. This allows for an integrated approach to promotion of public transport and CarSharing as complementary modes of transport.

4 Why CarSharing is vital for sustainable cities

We have identified eleven important reasons why CarSharing is a vital part of developing a sustainable urban environment.

- **Reduces CO₂ emissions from car use:** The huge up front capital cost of individual car ownership discourages owners from using other modes of transport such as walking, cycling, and public transport.
- **Reduces CO₂ from manufacture:** The manufacture of a car has a carbon footprint of between 6 and 35 tons depending on car size.
- **Reduces resource consumption;** Manufacture of a car accounts for approximately two-thirds of the entire lifecycle resource consumption of a car.
- **Reduces infrastructure:** Widespread adoption of CarSharing would allow the reduction of current car parking standards and associated built infrastructure. Carbon footprint of each underground car space is approx 25tons.

- **Reduces congestion:** Improves quality of life in our cities making them more attractive to families wishing to adopt a low carbon, car free lifestyle. Results in socially diverse living cities.
- **Improves Biodiversity:** Each car provided can replace at least ten individually owned cars allowing approx 150 sqm per car to be given back to biodiversity.
- **Reduced flooding:** Eliminating hard standing reduces flood risk from water run off from hard standing.
- **Reduced pollution:** reduction in hard standing reduces flow of contaminants heavy metals, hydrocarbons, plastics into water courses.
- **Improves Health and Wellbeing:** Areas freed from cars can provide playgrounds, sports facilities, allotments and informal play areas for children. This in turn helps reduce morbid childhood obesity.
- **More efficient land use:** Sustainable urban development becomes possible when excessive car parking no longer required.
- **Increases social equity.** CarSharing provides access for families and individuals to the benefits of car use without the cost of car ownership.

5 Comments on proposed Strategic Plan for Grangegorman

5.1 Traffic Management

We welcome the approach to traffic management on site. The strategy to give priority to pedestrians and cyclists and limit traffic to shared surfaces is very much in line with the development of a low car urban quarter as per the city of Freiberg which has pioneered this approach in Germany. The use of shared surfaces will create safe and people friendly streets which is vital to the success of a vibrant urban quarter.

It makes considerable sense as proposed in the strategy to provide very small numbers of surface car spaces scattered throughout the development. We would recommend that a percentage of these spaces are reserved for CarSharing bases. This allows the development of CarSharing and also helps reinforce the idea that shared spaces are indeed shared and that cars parked there are accessible to all.

It is a highly appropriate strategy given that the survey by the GDA of the transport modes used by people in the hinterland which has indicated high levels of traffic by foot, bicycle and by public transport. This provides a key opportunity to create a zone of low car use in the entire neighbourhood ranging from the inner city to Stoneybatter. By reducing the need for car parking in Stoneybatter, it may be possible to extend a Green corridor as proposed between the new development and the Phoenix Park. This could be achieved by planting trees and green spaces in redundant car spaces in the intervening streets throughout Stoneybatter. The streets of Stoneybatter are currently entirely devoid of trees.

5.2 CarSharing & Car parking provision

CarSharing is particularly suited to the mix of uses, Healthcare, Third Level education, cultural activities and residential being proposed at Grangegorman. This allows the cars to be shared at different times, during working hours by business, education and health workers for work-related trips and in the evening and at the weekend by the residents. This means that a small number of cars can provide individual mobility for a very large number of users, thus sharing the massive environmental impact inherent in the manufacture of each car. The residents are provided with access to a car when they actually need one without the associated costs associated with car ownership. The benefits therefore accrue to the car users, to the city and to the planet.

We would therefore propose that if CarSharing were to be introduced throughout the development it should be possible to consider further reducing car space provision provided on site. This would further reduce costs by reducing the need for the larger areas of underground car parking provided. This would result in considerable savings in the construction costs. It would also considerably reduce environmental impact by reducing quantities of earthmoving required and eliminate the carbon intensive concrete superstructure required.

We would consider that Dublin City Council's requirement for car spaces for each dwelling should be relaxed as this is no longer necessary where CarSharing is widely adopted as part of the solution by city planners.

Graham Lightfoot CMILT
Managing Director
GoCar CarSharing Limited

Appendix attached includes pictures of GoCar's GoBases in Dublin and Cork as well as an example of a Mobility Point ("Mobil Punkt) in Bremen, Germany, which provides integrated transport service infrastructure incorporating CarSharing station, Cycle parking facilities, local bus stop and public transport information.



GoCar's first GoBase in Dublin on Pleasants Street, just off Camden Street in D8.



GoBase in Cork City



GoBase in Cork City



CarSharing integrated with public transport.

"Mobil Punkt" in Bremen

John Hallinan (The village Quarter Business Forum)

Subject: Grangegorman

As a former DIT student, and now running my own business adjacent to Kevin St, I wish to object to the Grangegorman DIT project on behalf of our Association: Dublin City has always been the campus for the DIT colleges. Dublin City has provided a vibrant interchange for Lecturers & Students alike, and vice versa the shops and businesses in the city have benefitted with this through traffic.

It has created a true University City.

By having the DIT off in a particular political constituency, it is depriving the DIT and Dublin City of this unique vibrancy. If Grangegorman proceeds:

1. It will diminish the rate paying capacity of existing Dublin businesse.
2. The DIT population will be confined to a small area.
3. The closing of the existing DIT buildings which will be almost unsaleable in the foreseeable future, will create dereliction in our City.
4. Our economy cannot afford this costly project as there are other more Urgent projects which should be prioritised.

Please halt this madness!!

John Hallinan

The Village Quarter Business Forum

Camden Street,

Dublin 2

Maureen O' Sullivan T.D. And Cllr. Marie Metcalfe (Independent T.D.)

20th October 2010.

Submission to Grangegorman Development Agency

On behalf of Maureen O'Sullivan Independent T.D.
And Cncllr Marie Metcalfe, Independent

There are certain aspects we would like to highlight as being welcoming:

the extent of the public consultation;
the dispersal of the student accommodation;
the extent of green areas (even though it means increased number of high rise buildings);
the range of health services through H.S.E., including the medical facility and intensive care facility;
access for the community to the green space, the library and the sports facilities;
the architectural and historic significance of the area and buildings is recognised.

We have some areas of concern, mainly due to the projected population of some 27,000 on the campus:

Quality of life of the residents who are most impacted on because of the extent of this development, particularly in the areas of traffic management and housing. There must be a significant traffic management plan which will be constantly reviewed.

Regarding housing, a potential effect is the increase in flatland. The new occupiers cannot be allowed encroach on the lives of the residents. There is a significant older population in the Rathdown Road area. Therefore, we are calling on the D.I.T. authorities to take the initiative here by agreeing to set up a student contract on code of behaviour with appropriate action to be taken in the event of breaches.

We call on the G.D.A. to appoint a designated Community Liaison Person who will work, closely and in a meaningful way, with the communities most affected by the development.

We welcome the fact that there is a new L.A.P. and request that the plan for the Smithfield/Stoneybatter area be in the first tranche.

Finally, we would like to acknowledge the role of our predecessor the late Tony Gregory who spoke out so forcibly both in the Dáil and in the community on the issue. He made a very strong case for the inclusion of a resident from the local community organisations to be in the agency, calling for a truly representative consultative body and not just a 'talking shop'. We agree that in any area of major development it should be a basic right of the people who live there to be

represented on the agency overseeing the renewal of the area and be actively involved and listened to in the drawing up of strategic plans.

He particularly pursued the provision of a site for the Dublin 7 Educate Together school and the provision of recreational facilities which can be shared with the local residents. We welcome that has been done.

Judith & Declan Hannigan (private individuals)

To whom it may concern,

We would like to make the following comments on the draft strategic plan;

1. We would be highly in favour of access from the new development onto Prussia Street. This would integrate the new development and it's users with the neighbourhood of Stoneybatter and it's community.
2. All of the new development's facilities should be available for use by the surrounding communities at no cost, otherwise at reasonable rates.
3. The planning and construction phases should facilitate the creation of job opportunities for local people. Also job opportunities should be available for locals when the development is up and running.
4. Green spaces should be accessible and usable by the local community.
5. Bicycle lanes, both outside of the development and within the development should be provided for.
6. A traffic management plan should be put in place to anticipate and deal with the increase in population and people commuting to the area.
7. The development should be designed, built and used sustainably with a focus on using local resources and zero or low carbon technologies.
8. Not many school leavers in the surrounding areas go on to third level education. DIT should support second level students in the surrounding communities and promote third level education. Perhaps there should be a scholarship scheme for local students as an incentive to go on to higher level education.

Thanks & Kind Regards,
Judith & Declan Hannigan,

Mr. Jim Keogan, (Dublin City Council)



Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath

Planning & Economic Development Department,
Block 4, Floor 3, Civic Offices, Wood Quay, Dublin 8.

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04 NOV 2010

Roinn Pleanála agus Forbartha Eachnamaíochta
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8.
T. 01 222 3800 F. 01 222 2278 E. planning@dublincity.ie

Ger Casey,
Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7

29th October, 2010

Re: Draft Strategic Plan for Grangegorman

Dear Ger

Dublin City Council welcomes the publication of the Draft Strategic Plan for Grangegorman, and commends the team on the production of a high quality policy document and masterplan.

The Grangegorman site is a key strategic site within Dublin City and is identified as such in both the current and Draft City Development Plans. It presents a great opportunity for a large scale, integrated, sustainable redevelopment; creating a new quarter within the heart of the City. The site contains many assets in its built heritage and green spaces, creating both opportunities and challenges in planning for this sites future. The Grangegorman development is a critical project for the inner city and will play a pivotal role in realising the full potential of the northwest flank of the urban core, connecting through Broadstone/Kings Inns and underpinning Smithfield. The location of the site beside urban villages with strong local communities places a responsibility and an opportunity to bring benefits to the surrounding areas.

The Draft Dublin City Development Plan 2010-2016 in Chapter 16 sets out a series of guiding principles for Grangegorman supporting the future development of the site as a high quality character area. It is considered that the Draft Strategic Plan published by the GDA seeks to deliver the principles listed in the Draft Development Plan and describes a framework for developing the site that is sustainable, attractive and integrated into the urban character of its location.

The Draft Strategic Plan has grasped the opportunities presented by this superb location and presents a detailed masterplan integrating the needs of HSE, DIT, the new school and supported housing, and in preserving protected structures and creating new amenities and resources for both students and surrounding communities to benefit from.

It is considered that the current consultation process presents an opportunity to identify issues that the GDA may wish to consider and expand upon in finalising the Strategic Plan.

1. The role and impact of transport for the site, particularly parking provision and management and the need for mobility framework plans are referred to in the Strategic Plan. The identification of linkages to key bus routes and services could be

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expanded on, showing how the campus could be well served by buses (Dublin Bus, Bus Eireann and private) running on the N2 and N3 corridors

2. The provision of cycleways, connecting to future strategic cycle elements of a city-wide network should be examined in more detail, providing routes through the site to benefit of surrounding areas and also to provide safe routes to school for children attending both the on-site and adjacent schools
3. An attractive temporary access onto Constitution Hill and to Bolton Street prior to the completion of the Broadstone gate element should be considered as part of completing phase 1

We look forward to the completion of the Strategic Plan and ask that the above points are considered as part of the finalisation process.

Yours Sincerely



JIM KEOGAN
A/Executive Manager



Grangegorman Development Agency
St. Brendan's Hospital
Grangegorman
Dublin 7

1st November 2010

A-PS/CP

**RE: SUBMISSION TO DRAFT STRATEGIC PLAN AND ITS ENVIRONMENTAL
REPORT FOR DEVELOPMENT OF LANDS AT GRANGEGORMAN,
DUBLIN 7**

Dear Sir/Madam,

On behalf of the Directors who own the premises of O'Connor Sutton Cronin Multidisciplinary Engineers which front onto Prussia Street and side onto Fingal Place, we would like to make the following submission to the Draft Strategic Plan for Development of Lands at Grangegorman, Dublin 7.

We confirm having attended the presentations regarding the public consultation on the Strategic Plan and its Environmental Report for Development of Lands at Grangegorman, Dublin 7, that we were very impressed with the proposed development plan for the entire area.

We were particularly pleased to see that the connectivity to the existing community and the philosophy of reaching in and reaching out regarding the proposed development interacting with the existing community is high on the priority list for the development.

O'Connor Sutton Cronin Consulting Engineers are a multidisciplinary international firm of consulting engineers now with offices in the UK, Russia, Poland, Romania, Libya, Abu Dhabi and Costa Rica.

O'Connor Sutton Cronin commenced operations in Dublin in 1988 and has progressively moved forward in the field of engineering to become an internationally renowned firm of consulting engineers. We confirm that we met with representatives of the Grangegorman Development Agency and Dublin Institute of Technology regarding our proposed submission.

We confirm that we have existing relations with Dublin Institute of Technology insofar as we offer and provide mentorship for a number of final year students in the structural engineering course to come to O'Connor Sutton Cronin and participate in live projects and to mentor these students in order to improve their understanding of the role of a consulting engineer in both design and in society.

Pearse Sutton who is an Honours Graduate of Bolton Street has maintained a strong link with DIT. He was external examiner for 6 years. He was involved in Eurofortech (European Network for Forest and Wood Industries) which was also set up in Bolton Street originally. Pearse Sutton has lectured in the structural aspects of design, detailing and specification of timber for the DIT training course "Timber Sector Training Initiative" and was a judge for a number of years for the Interact International Competitions held at Bolton Street.

Recently both Pearse Sutton and Bolton Street DIT have collaborated to provide an introduction to Engineering Companies in Oman for possible joint venture partnerships whilst DIT are recruiting overseas students.



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CRONIN**

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There is therefore a strong existing link between DIT and OCSC and we believe that the location of DIT in the neighbouring Grangegorman site can reinforce and expand these links for our mutual benefit.

Our submission is that our premises which connect to the Grangegorman site as per the enclosed maps and which has a courtyard area adjacent to Fingal Place be connected to the main campus. We would propose that the existing stone boundary wall be allowed to be opened up, obviously between the mature trees thereby preserving them, so that the offices of O'Connor Sutton Cronin Consulting Engineers could become linked with the campus and that international commercial opportunities between the campus and O'Connor Sutton Cronin could be enhanced as a result. The offices may be used for such activities as incubator units with the facilities that exist within an international consulting engineers office and can be shared with the people using these incubator units thereby minimising start up costs associated with such activities. This is just one of the many possible ways of interaction.

The promotion of activity between the campus and that of an international consulting engineering practice has many advantages in the progression from education to implementation of engineering at the highest level for international export and to ensure that the world in general can avail of the skills being provided from the Grangegorman development.

We would therefore request that our proposal be included in the Strategic Plan for the Development of Lands at Grangegorman, Dublin 7 and enclose a number of maps and drawings to indicate the premises of O'Connor Sutton Cronin as discussed above.

Please note that O'Connor Sutton Cronin established the offices at Prussia Street and Fingal Place some 10 years ago and are now very much a part of the local community providing employment and contributing to the local economy in any way it can.

We thank you for your time in presenting your proposed development and wish you all the best regarding this development in the future.

Yours sincerely,



PEARSE SUTTON
For O'Connor Sutton Cronin





OCSC
O'CONNOR | BUTTON | CROHN
Multidisciplinary
Consulting Engineers

OCSC Offices
Denoted in Red



SITE LOCATION
MAP - Sheet 1



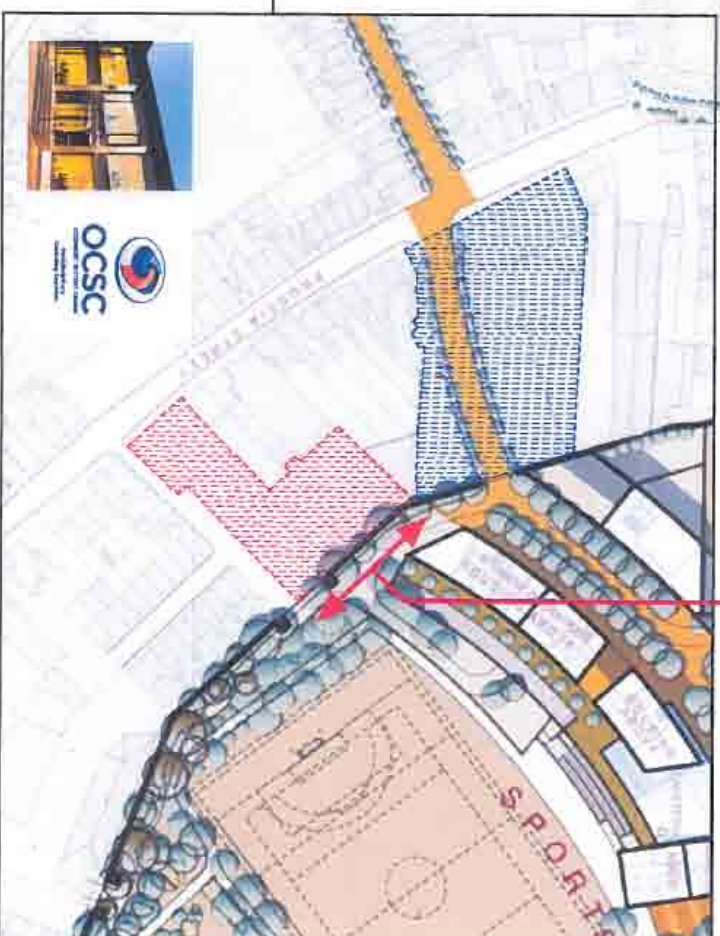
OCSC Offices
Denoted in Red

SITE LOCATION
MAP - Sheet 2



Masterplan Design

OCSC Offices Denoted in Red.
Existing stone boundary wall between two properties, proposal to open wall to Ocsc office courtyard to provide and enhance integration between office and Grangegorman campus. In addition to an improved / updated facade treatment to existing Ocsc building to compliment and promote synergy with the new Grangegorman buildings.



OCSC
O'CONNOR | SUTTON | CONNOLLY
Multidisciplinary
Consulting Engineers

Maolsheachlainn O’ Caollai (private individual)

Plean Straitéiseach Ghníomhaireacht Forbartha Ghráinseach Ghormáin

Aighneacht

Tá Plean Straitéiseach Ghníomhaireacht Forbartha Ghráinseach Ghormáin ar fheabhas ar a lán bealaí. Is eiseamláir phleanála é arbh fhiú do udaráis agus forais eile stáit, cuid acu nach bhfuil aon dúil acu i bpleanáil straitéiseach, aird a thabhairt air.

Is féidir “cuimsitheach” agus “uileghabhálach” a thabhairt air. Is fíor é sin ach go háirithe maidir leis an aird agus an aire a thugann sé don oidhreacht ailltireachta agus dúlra san áit. Tugann sé aird freisin ar acmhainní bunúsacha ar nós soláthar aeir úir agus go fiú foinsí uisce aiceanta na háite.

Suíomh an-mhór cathrach is ea é; tá 73 acra ann. Tá soláthar san togra do riachtainis Institiúid Teicneolaíochta Átha Cliath a mbeidh a chuid coláistí uile ag aistriú isteach ann ón 40 foirgneamh atá acu ar fud na cathrach. Beidh áiseanna sláinte ann chomh maith a bheidh faoi stiúr Fheidhmeannacht na Seirbhíse Sláinte. Cuirfear deiseanna caomhachais ar fáil do na pobail áitiúla a bheidh in ann taithneamh a thabhairt do ghairdíní agus páirceanna poiblí. Beidh deiseanna spoirt ann, chomh maith agus beidh soláthar ann do na healaíona. Táthar ag súil freisin go mbeidh leabharlann poiblí suite ann. Anuas ar sin tá bunscoil do 400 dalta curtha ar fáil cheana féin ar an suíomh ag An Roinn Oideachais agus Eolaíochta agus beidh áiseanna siopadóireachta ann.

Beidh ard-chaighdeán ag baint leis na foirgintí agus áiseanna éagsúla, rud nach bhféadfadh a bheith amhlaidh mura mbeadh an tiacóg mhór, beagnach €486 milliún atá á chur ar fáil ag an Rialtas. Tá an togra chomh tábhachtach sin gur reachtaigh an Rialtas acht ar leith chun bonn slán a chur faoin ngnó ar fad.

Ní ábhar iontais é go luaitear go minic san bplean gur togra fíor thábhachtach é seo, an togra athnuachana cathrach is mó a deineadh le tamall de bhlianta. San bPlean Straitéiseach luaitear abairtí mar “*prime state asset*” agus cuirtear béim ar a thábhacht náisiúnta agus loganta nuair a deirtear gur “*flagship development*” a bheidh ann. Tá tábhachtacht chomharthach ag baint leis mar sin agus dá bhrí sin is ábhar spéise é do mhuintir na tíre ar fad agus ní do na daoine áitiúla amháin.

Ach in dhiaidh sin agus uile, tá easpa agus uireasa ar an bplean a bheadh dó-chreidte in aon tír eile ar domhan a bhfuil meas aici uirthí féin agus ar a oidhreacht agus ar a hacmhainní cultúir. An té a léifeadh an cur síos a deineadh san Phlean ar stair na haite, shilfeadh sé/sí gur sa bhliain 1773 (*Grangegorman, a Brief History*), nó ar a luaithe gur le linn tús ré na Normanach in Éirinn a thosaigh stair an cheantair. (*Project Vision and Context*)

Ach, ar ndóigh, bhí daoine in Éirinn, agus san cheantar áirithe seo ar feadh na mílte bliain roimhe sin. Bhí cultúr ar leith ag na daoine sin agus litríocht á chumadh agus á scríobh ina dteanga, an Ghaeilge, roimh aon teanga eile in iar-thuaisceart na hEorpa. I dtús ré na Críostaíochta in Éirinn, san chúigiú aois agus ina dhiaidh bhí pobal Gaelach sa gceantar agus foirgneamh eaglasta acu ar a dtugtaí **Cill Dúiligh**. Míle bliain ina dhiaidh sin a chead tugadh an logainm *Grangegorman* ar an áit.

Bhí pobal Gaeltachta fós sa gceantar san naoú aois déag ag am nuair nach raibh ach pobal amháin eile Gaeilge fágtha i gcathair Bhaile Átha Cliath

Tá sé le tuiscint ón bPlean Straitéiseach narbh ann aríamh don stair sin agus níos measa ná sin, nach ann, ar na saolta seo do theanga bhunaidh an cheantair—an nasc beo idir sinne atá ar an saol faoi láthair agus na

daoine a mhair mile go leith bliain ó shin.

Aithnítear i mBunreacht na hÉireann gurb í an Ghaeilge an teanga náisiúnta agus an chéad teanga oifigiúil. I ngeall ar ar éirigh dí le linn ré an choilíneachais tá an Ghaeilge lag agus i mbaoil. Is chun í a shlánú agus a athréimiú a bunaíodh stat neamhspleach Éireannach. Thuig smaointeoirí na réabhlóide nach mairfeadh sí gan stát a d'ardódh i réim í, a chuirfeadh ar a laghad ar aon chéim i leis an mBéarla, ó thaobh stádais comhdhaonnaigh agus ó thaobh úsaide de. Bhí sé i gceist go mbeadh áit shuntasach ag an nGaeilge agus a bhaineann léi i bhforbairtí fíor thábhachtacha ar nós togra Ghráinseach Ghormáin.

Léigh mé an chuid is mó de na cáipéisí a foilsíodh ar an idirlíon ach ní fhaca mé tagairt ar bith don Ghaeilge—focal amháin ní fhaca mé agus ní fhaca mé tagairt ar bith do aitheantas ar bith don Ghaeilge ná stádas ar bith a thabhairt dí. San acht bunaithe, *Grangegorman Development Agency Act 2005*, tá ceithre fhocal i nGaeilge, mar atá, "Gníomhaireacht Forbartha Ghráinseach Ghormáin", ach thairis sin níl tada ann.

B'fhéidir go ndéarfar go mbeidh scéimeanna Gaeilge ag Institiúid Teicneolaochta Átha Cliath. Ó tharla gur eagrais oideachais é an ITAC bheifí ag súil go mbeadh. Bheadh dóchas agamsa go mbeidh. Ach ní hé sin atá i gceist anseo. Táthar ag trácht anseo ar Phlean Straitéiseach Ghníomhaireacht Forbartha Ghráinseach Ghormáin agus ní ar aon ní a bheadh beartaithe ag aon cheann de na tionóntaí a bheidh san áit.

Tá ceist le freagairt ag na h-eagrais stáit úd a bhfuil dualgas ar leith orthu leas na Gaeilge a dhéanamh. Cén fáth gur lig siad don acht agus don togra ardghradaim seo dul ar aghaidh gan féachaint lena chinntiú go mbeadh leas na Gaeilge san aireamh? Ach, ó tharla gur eagrais stáit é Gníomhaireacht Forbartha Ghráinseach Ghormáin tá dualgas air siúd, mar chuid dá ghnó, an Ghaeilge a chur chun cinn.

Céard atá beartaithe ag Gníomhaireacht Forbartha Ghráinseach Ghormáin chun an Ghaeilge a ardú i réim? Freagra: Tada. Níos measa ná sin, i staid ina bhfuil dhá theanga in iomaíocht, is íslíú stádais do theanga amháin nuair nach dtugtar aitheantas ach don teanga eile. Sin go díreach atá á dhéanamh.

Bhí deis ag Gníomhaireacht Forbartha Ghráinseach Ghormáin an Ghaeilge agus an tomoideachas Gaeilge (atá ag fás agus ag forbairt imeasc gnáth mhuintir na hÉireann) a nascadh leis an "*flagship development*" seo trí bheartú do naíonraí agus gaelscoil ar an suíomh. D'fheidhméodh siad-san mar stáisiúin ghinte na Gaeilge sa gceantar ar fad. Ina ionad san, bunaíodh bunscoil Bhéarla san áit a mbeidh scoth na n-áiseanna aici. Tuigim, ar ndóigh gurb cuid de dhúnghaois An Roinn Oideachais agus Eolaíochta tús áite a thabhairt do scoileanna Béarla agus gurb é an Roinn sin a bhunaigh an scoil.

Moltaí.

Molaim go leasófar an Plean Straitéiseach chun tograí mar seo leanas a fhorbairt agus go gcuirfear na hardchaighdeáin chéanna i bhfeidhm maidir lena bpleanáil is a chuireadh i bhfeidhm don bpleanáil atá léirithe sna cáipéisí a foilsíodh.

- 1) Chun aitheantas a thabhairt don bhfíric go raibh stair, cultúr agus teanga ag an gceantar ar feadh míle bliain roimh theacht na Normanach agus gur nasc beo í an Ghaeilge idir an ré sin agus an ré seo againne,--na daoine a bhí ann an uair sin agus na daoine atá ann faoi láthair,-- go n-athrófar ainm an suímh ó *Ghrangegorman* go **Cill Dúiligh**, an t-ainm a bhí san cheantar, ní ar feadh cúig chéad bliain, ach ar feadh míle bliain ar a laghad. Bheadh de bhuntáiste breise aige sin go nascfadh sé an suíomh le tuaisceart Átha Cliath agus a stair.
- 2) Anuas ar sin, molaim go ndéanfaí taighde ar an bpobal Gaeltachta a bhí sa gceantar san naoú aois déag agus go dtabharfaí aitheantas don phobal sin trí áiseanna pobail don Ghaeilge a chur ar fáil agus an pobal deireannach Gaeltachta a mhair i dtuaisceart Bhaile Átha Cliath a cheiliúradh tríd a ainm a nascadh leis an háiseanna sin.

- 3) Chun deis phraiticiúil a thabhairt don Ghaeilge sa gceantar agus ar an suíomh féin, go gcuirfear áiseanna den scoth ar fáil do **dhá naíonra** (ar eagla na míthuisceana, Gaeilge amháin a bhíonn mar theanga cumarsáide i naíonraí). Ó tharla go reachtáileann Institiúid Teicneolaíocht Bhaile Atha Cliath cúrsaí céime san chúram leanaí a bhfuil aird acu ar chúram leanaí trí Ghaeilge, d'fhéadfadh na naíonraí agus Institiúid Teicneolaíocht Bhaile Atha Cliath cabhrú lena chéile ar bhealaí éagsúla, deiseanna chleachtaidh do na fochéimithe san áireamh.
- 4) Go gcuirfear áiseanna ar fáil do ghaelbhunscoil a bheidh áiseanna aici a bheidh ar aon chaighdeán agus ar aon suntas leis na háiseanna atá bronnta ar an mbunscoil Bhéarla agus ar an gcaoi céanna inar tógadh an bunscoil Bhéarla isteach san suíomh, go dtabharfar cuireadh do na heagrais ghaelscolaíochta agus Ghaeilge an gaeilscoil seo a reachtáil.
- 5) Gur sa dá theanga a bheidh na comharthaí eolais poiblí ar fad a bheidh ar an suíomh.

Maolsheachlainn Ó Caollaí
05.11.2010

Note: Translation below:

Grangegorman Development Agency Strategic Plan

Submission

The Grangegorman Development Agency Strategic Plan is excellent in many ways. It is a planning exemplar and many other state bodies, some of which have no interest in strategic planning, would do well to note it.

It can be called “comprehensive” and “all-inclusive”. This is true particularly regarding the care it takes over the architectural and natural heritage of the area. It also takes note of basic resources such as fresh air supply and even the area’s natural water sources.

It is a very large city site; it consists of 73 acres. The proposal provides for the requirements of the Dublin Institute of Technology, all colleges of which will be transferred into it from the 40 buildings they have around the city. It will also contain health facilities under the direction of the Health Service Executive. Local communities who will be given conservation opportunities will be able to enjoy public gardens and parks. There will be sporting opportunities, also as well and provision will be made for the arts. It is also hoped to locate a public library there. In addition the Department of Education and Science has already provided a primary school for 400 pupils on the site and there will be shopping amenities.

The various buildings and amenities will be of a high standard, which would not be the case without the substantial purse, almost €486 million which the Government is providing. Such is the importance of the proposal that the Government introduced a specific act to put the entire business on a sound footing.

It is no surprise that it is often mentioned in the plan that this is a truly important proposal, the largest urban renewal proposal done for some years. The Strategic Plan mentions phrases such as “*prime state asset*” and its national and local importance is stressed when it is said to be a “*flagship development*”. It is therefore of symbolic importance and for that reason it is of interest to every person in the country and not just to local people.

Despite all this, the plan is deficient and lacking in ways which would be incredible in any other country on

earth with respect for itself and its heritage and its cultural resources. A person reading the description in the Plan of the area's history would think that that history began in 1773 (*Grangegorman, a Brief History*), or at the earliest during the early Norman period in Ireland (*Project Vision and Context*)

But, of course, there were people in Ireland, and in this particular area for thousands of years before that. Those people had a distinct culture with a literature being composed and written in their language, Irish, before any other language in north-western Europe. At the beginning of the Christian period in Ireland, in the fifth century and later there was a Gaelic community in the area who had an ecclesiastical building known as **Cill Dúiligh**. The place was first given the placename *Grangegorman* one thousand years later.

There was still a Gaeltacht community in the area in the nineteenth century at a time when there was only one other Irish-speaking community in Dublin city.

It is to be understood from the Strategic Plan that that history never was and what is worse, that the original language of the area is not to be found in present times – the live link between us, who exist at the present time and the people who lived one and a half thousand years ago.

Bunreacht na hÉireann recognises that Irish is the national language and the first official language. Given what befell the language during the colonial period Irish is weak and endangered. An independent Irish state was founded to rescue and re-establish Irish. The thinkers of the revolution understood that Irish would not survive without a state that would raise its standing, which would put it at least on a par with English, in terms of social status and usage. It was intended that Irish, and all associated with it, would have a significant place in very important developments such as Grangegorman.

I read most of the documents which were published on the internet but I saw no reference to Irish—I did not see so much as a word and I saw no reference to recognition or status of any kind being given to Irish. In the establishing act, *Grangegorman Development Agency Act 2005*, there are four words in Irish, namely “Gníomhaireacht Forbartha Ghráinseach Ghormáin” but nothing more than this.

It may be said that the Dublin Institute of Technology will have Irish language schemes. Given that the DIT is an educational institution it is to be expected that it would. I myself hope it will. But that is not the issue here. What is being referred to here is the Grangegorman Development Agency Strategic Plan and not anything which any of the tenants in the area would have planned.

Those state agencies which have a particular responsibility regarding the Irish language have a question to answer. Why did they allow the act and this esteemed proposal to proceed without seeking to ensure that the interests of the Irish language would be included? But, given that the Grangegorman Development Agency is a state agency it has a duty, as part of its dealings, to promote the Irish language.

What does the Grangegorman Development Agency plan to do to improve the standing of Irish? Answer: Nothing. Worse than that, in a situation of two competing languages, where only one language is given recognition the status of the other language is lowered. Exactly this is being done.

Grangegorman Development Agency had an opportunity to link the Irish language and Irish-language immersion education (which is growing and developing among the ordinary people of Ireland) with this “*flagship development*” by planning for preschools and a gaelscoil on the site. These would operate as a generating station for Irish in the entire area. Instead, an English-language primary school was set up where it will have the best of facilities. I understand, of course, that giving preference to English-language schools is part of the Department of Education and Science's doctrine and that it was the Department which set up the school.

Recommendations.

I recommend that the Strategic Plan be amended to develop proposals such as the following and that the same high standards be applied to their implementation as were applied to the planning demonstrated in the documents which have been published.

- 1) To recognise the fact that the area had a history, a culture and a language for a thousand years before the arrival of the Normans and that Irish is a living link between that age and our own,--the people who were there then and the people there now,-- that the name of the site be changed from *Grangegorman* to **Cill Dúiligh**, the name which existed in the area, not for five hundred years, but for at least a thousand years. This would have the added advantage of linking the site to north Dublin and its history.
- 2) In addition, I recommend that the Gaeltacht community in the area in the nineteenth century be researched and that recognition be given to that community by providing community facilities for the Irish language and the last Gaeltacht community which lived in north Dublin be celebrated by linking its name with those facilities.
- 3) In order to give a practical opportunity to the Irish language in the area and on the site itself, that high quality facilities be made available for **two naíonraí** (to avoid misunderstanding, Irish is the only medium of communication in naíonraí). As the Dublin Institute of Technology organises courses in childcare including childcare through Irish, the naíonraí and the Dublin Institute of Technology could assist each other in various ways, including practice opportunities for the undergraduates.
- 4) That facilities be made available for an Irish-medium Primary school which will have facilities equally significant as the English-language primary school brought into the site, that the Irish-medium educational and Irish language organisations be invited to organize this school.
- 5) That all public information signs on the site be in both languages.

Maolsheachlainn Ó Caollaí
05.11.2010

Mr. Ray Dempsey, (the Old Jameson Distillery)

Ronan Doyle
Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7

Date 09/11/10

Re: Submission on the Grangegorman Draft Strategic Plan and Environmental Report

Applicant: Old Jameson Distillery

Location: Bow Street, Smithfield .

Dear Sirs,

On behalf of the management of The Old Jameson Distillery, Smithfield , Dublin 7, we would like to express our support in terms of the proposed Draft Strategic Plan and Environment Report for the Grangegorman Development.

It is a welcoming development to learn that this landmark parkland area has been zoned as a consolidated educational centre for DIT and other related facilities. It is a welcome activity to the North inner city region and Smithfield will profit from increased footfall as a result.

Over the past number of years, the decline of commercial activity in Smithfield has been a real concern of the local community both commercial and residential. To see active plans for investment in this locality will bring much needed commercial activity into the area and enhance the already established commercial facilities of the Smithfield Area and encourage a range of necessary services as a result.

Yours sincerely,

Ray Dempsey.

General Manager
The Old Jameson Distillery
Bow Street,
Smithfield,

Dublin 7.

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OPERATING COMPANIES OF WATERCOURSE DISTILLERY LTD

IRISH DISTILLERS GROUP | SIMMONSCOURT HOUSE | SIMMONSCOURT ROAD | BALLSBRIDGE | DUBLIN 4

PH: 00 353 (0)1 2129000 | FAX: 00 353 (0)1 2129001

DIRECTORS: John Caley – Chairman & CEO, Paul Duffy, Mohit Lal, Maurice Smyth

Registered in Dublin, Ireland. Number 15558. Registered Office: Bow Street, Smithfield, Dublin 7, Ireland



The Committee, (SABA)



Ronan Doyle
Grangegorman Development Agency
St.Brendan's Hospital
Grangegorman
Dublin 7

09 11 2010

Submission on the Grangegorman Draft Strategic Plan and Environmental Report

Dear Ronan,

SABA is the collective forum for 30 local business stake holders in Smithfield. We would like to take this opportunity to express in writing our support for the proposed Grangegorman Strategic Plan and Environmental report. The reason for this is quite simple. The plan will facilitate the objectives toward which SABA was formed.

Namely,

- o Increase footfall in the area
- o Promote Smithfield as a destination for business, entertainment and culture
- o Change perception of Smithfield and North Inner City Dublin
- o Keep existing businesses in business
- o Attract new businesses
- o Invite events to the area, such as concerts, markets, etc.

Smithfield as an area has, despite recent development, remained an under utilised urban space. The result of this is closing businesses, lost jobs and continued urban decay and unrest.

We strongly support and urge the City in all its efforts to support initiatives like these. With consolidating DIT Educational facilities and accommodating its students so close to Smithfield, the results would greatly benefit the area by an enhanced footfall, necessity for additional new services and businesses and a general positive cultural atmosphere.

On the last note, we would like to encourage you to consider a development of a pedestrian root from Prussia St. through North Brunswick st. to Smithfield, in order to enhance the footfall from the potential DIT site to the area.

Sincerely yours

The Committee

The Old Irish Distillers Building, New Church street, Smithfield, Dublin 7

087 921 4156 laura@talentedminds.ie

Mary Walker, (private individual)

Transcribed from handwritten letter

To

Development Agency,

Following your request for suggestions regarding planning etc. I would like as much as possible shrubberies and trees to remain, to be as sympathetic to wildlife as possible. To leave it as natural as is practical.

Yours sincerely,

Mary Walsh

Dermot Walsh (private individual)

There are a number of errors in the historical section of the Draft concerning Grangegorman at 2.2. There were 283 patients in the Richmond Asylum (the predecessor of Grangegorman) on 31/3/1850 and not 600 as stated. The number in Grangegorman in the 1940s was not 3,500. This figure is inclusive of Portrane. In fact the numbers in Grangegorman never ran much over 2,000.

Dermot Walsh.

David Tuohy (Dept of the Environment)



Cornhshaal, Oidhreacht agus Rialtas Áitiúil
Environment, Heritage and Local Government



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23 NOV 2010

19th November 2010

Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7

Re: GDA Draft Strategic Plan 2010, SEA and AA

Our Ref: G2010/528

A chara,

I refer to your correspondence of 2nd and 10th November seeking observations in relation to the SEA of the above plan. Please find below the nature conservation recommendations of the Dept. of the Environment, Heritage and Local Government.

The strategic plan does not make much mention of how it will protect and enhance the natural heritage as stated in socio-economic aim 3, although we acknowledge that it is stated in the SEA that it is proposed that the GDA will cooperate with Dublin City Council in the implementation of their Biodiversity Action Plan.

It is stated in the SEA that several of the mature trees are potential bat roosts and that the GDA have undertaken to carry out a full bat survey of the site to ascertain the presence and location of bat species on the site. However it is stated in the Draft Strategic Plan in section 2.3.2.1 that a bat survey confirmed the presence of common pipistrelle bats on site. This would appear to be contradictory and needs to be clarified.

Section 5.2 of the SEA lists the environmental objectives, indicators and targets for biodiversity, flora and fauna. With regard to the last target re bats this target states that where bat roosting sites are impacted alternative roosting sites such as bat boxes will be provided. However this would be subject to a derogation licence and we refer you to Circular Letter NPWS 2/07 entitled Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences, which can be found on our website, www.npws.ie.

Kindly forward any further information to the following address:

The Manager,
Development Applications Unit,
Department of the Environment, Heritage and Local Government,
Newtown Road,

Please note – our new address for all correspondence is:
The Manager,
Development Applications Unit,
Department of the Environment, Heritage and Local Government,
Newtown Road,
Wexford

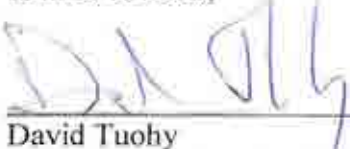


Wexford.

In addition, please acknowledge receipt of this submission and forward the relevant receipt to the above address.

Finally, the above observations and recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in his role as statutory consultee under the Planning and Development Act, 2000 as amended.

Is mise le meas,



David Tuohy
Development Applications Unit
053 9117380
David.tuohy@environ.ie

*Please note – our new address for all correspondence is:
The Manager,
Development Applications Unit,
Department of the Environment, Heritage and Local Government,
Newtown Road,
Wexford*

Brian Beckett - Inland Fisheries Ireland

Our comments on the above matter are as follows:

The separation of foul and surface water infrastructure on the site and the implementation of a SUDS approach is welcome. Whilst the provision of this separate system will result in the removal of a substantial volume of surface water from DCC's waste water treatment system it is important to note that hydraulic and biological loadings differ greatly in their impact on the wastewater treatment system. It should be noted that an increase in foul loading from 200m³ per day pre-development to 1,254m³ per day post-development is projected. It is essential that the receiving foul water infrastructure has adequate capacity to accept predicted volumes from this development with no negative repercussions for quality of treatment, final effluent quality and the quality of receiving waters. In this regard it should be highlighted that Tom Phillips and Associates concluded in their Appropriate Assessment Screening document that the implementation of appropriate mitigation measures in addition to upgraded operation of the Ringsend WWTP would be necessary to ensure the water quality of Natura 2000 sites would not be put at risk. It is of vital importance that any works will not cause a deleterious effect on aquatic life in any way. The River Liffey is exceptional among most rivers in the area in supporting significant populations of Atlantic salmon (*Salmo salar*, listed under Annex II and V of the EU Habitats Directive) and Sea trout in addition to resident Brown trout (both *Salmo trutta*) populations in addition to many other fish species. This highlights the sensitivity of local watercourses and the Liffey catchment in general.

Best regards,

Brian.

Brian Beckett
Fisheries Environmental Officer

Iascach Intíre Éireann
Inland Fisheries Ireland

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Web www.fisheriesireland.ie

15a Main Street, Blackrock, County Dublin, IRELAND.

Sonia Lennon - Phoenix Montessori School

Business Proposal

Phoenix Montessori School

Business Proposal

This submission is for the proposal of a Montessori pre-school class for September 2011. As qualified experienced Montessori teachers we are looking for a challenging opportunity. We feel that there is a gap in the pre-school market for this type of facility. With the new government ECCE scheme in place, this allows all children to attend pre-school for one year free of charge. Our aim is to set up a Montessori preschool class for children who will be attending National school following a year in the Montessori classroom. The basis behind the idea of setting up the Montessori pre-school class is to give children a basic foundation in education before progressing into primary education. To go about setting up the Montessori school we will be looking to rent adequate rooms and facilities within the Grange Gorman grounds.

The Montessori Method

The 'Montessori Method' recognizes each child as an individual with a unique personality and ability. The combination of quality care and loving attention in our 'prepared environment' encourages the natural rhythm of learning and development. Our preschool programme will further enrich the child's lives by providing a multitude of specially designed, developmentally appropriate activities for students within the Montessori curriculum. Favourable teacher-child ratios, small groups and a variety of learning materials will give children exciting opportunities for exploration, stimulating their curiosity and motivating them to learn. The programme attempts to cope with ethnic diversity within the Dublin region. This will be assessed on a yearly basis when each class is finished.

Curriculum Outlined

The Montessori Curriculum is a holistic approach to child education and development in that it covers all aspects of a child's development both physically and psychological. It is divided into the following modules, all of which are introduced in a 'Prepared Environment'.

Practical Life

This is an extension of a child's home environment and it aims to give the child confidence and independence. Indirectly it prepares the child for reading and writing by always working left to right. There are four distinct groups of Practical life exercises.

- Elementary Movements (opening, closing, spooning, transferring, balancing)
- Care of the person (buttoning, zipping, hand washing, tying etc)
- Care of the environment(cleaning, sweeping, gardening, pet care etc)

- Social skills Grace and Courtesy (greetings, serving, accepting, apologies, home environment and it aims to give the child confidence and independence. Indirectly it prepares the child for reading and writing by always working left to right.)

In the Montessori classroom, Practical life includes activities that prepare the child for daily living.

Sensorial

Children live in a world of senses, colour, size, dimension, shape, form, sound, touch, taste and smell. The sensorial Montessori materials enable them to clarify, classify and comprehend their world. They also provide a basis for the development of other skills such as music, mathematics and language.

Language

A multi-sensory approach that combines phonics, stories and language experiences to bring meaning to the learning of reading and writing. The Montessori Method does not require a child to learn by heart, but utilise his senses to help him read and write with proper understanding. Discovering language becomes interesting, fun and creative through activities in the Pink, Blue and Green Montessori language series.

Mathematics

An activity-based programme that allows a child to have 'hands on' experience in learning mathematical concepts. The programme develops through sensorial approach going from concrete activities to abstract until a stage where addition, subtraction, multiplication and division are introduced.

Culture

Through cultural activities, children gain a meaningful, involved acquaintance with:

- Plants
- Animals
- Music
- Basic science concepts
- Arts and crafts

Geography and earth science are introduced through appropriate materials which the child works with individually and in small groups.

- Jigsaw-puzzle maps
- Model land forms
- Water forms
- Cultural pictures

These help the child to gain a greater understanding of their surrounding and a respect for nature.

Business details

The running of the business will consist of a sessional Montessori in the morning (approx 3hour session) and another session in the afternoon. The Montessori would be ideal for a group of

approximately 20 children and will be available to children attending National school following a year in the Montessori pre-school class.

A second option would be one Montessori session in the morning and afterschool care for the Educate Together school also located in Grange Gorman grounds.

Key people details

Key person 1

Name: Sonia Lennon

Role: Montessori Teacher, after school carer and stakeholder in the business.

Qualifications: Diploma in Montessori and childcare 2 ½ to 6 years.

Key person 2

Name: Aoife O'Connor

Role: Montessori Teacher, after school carer and stakeholder in the business.

Qualifications: Diploma in Montessori and childcare 2 ½ to 6 years.

Diploma in Advance Montessori 6 to 12 years.

Please consider our proposal and we look forward to hearing from you. If there are any queries you have regarding the proposal please does not hesitate in contacting us. Thank you for taking the time to read our proposal.

Sonia Lennon

Aoife O'Connor

Owen Collumb - (Greater Dublin Independent Living)



MACRO Resource Centre
1 Green St.,
Dublin 7

01-8737039
E-mail: dublin7@dublincil.org

**Greater Dublin
Independent Living Ltd.**

**Submission
to**

Health Service Executive (HSE)

Ref:

Grangegorman Development Agency (GGDA)



Purpose of Submission:

To outline the areas of interest of

Greater Dublin Independent Living (GDIL)

To the proposed Grangegorman redevelopment.

Background to Greater Dublin Independent Living Ltd





The Greater Dublin Independent Living Ltd was established in 1993 and was then called the “Dublin 7 Centre for Independent Living”. As the city grew, so too did the number of people with disabilities who were actively engaging in mainstream life in Dublin and the board took a decision last year to broaden the scope of the company to include disabled people from all parts of Dublin, hence the new name “Greater Dublin Independent Living Ltd”.

The Independent Living movement is based on the principles of Empowerment, Rights, Options and Independence and believes that each disabled person should have control over their lives and the decisions that affect them.



(Microsoft)

The core activities of the organisation as laid out in the Articles of Association are:

-  To promote the empowerment of persons with disabilities through the development of an appropriate range of personal assistance services aimed at removing attitudinal and material restrictions that unnecessarily limit the lives of such persons.
-  To promote and develop the concept of independent living for persons with disabilities and in particular to engage in action research programmes aimed at developing services that achieve inclusion in society.
-  To develop training programmes that will assist in the empowerment of people with disabilities.
-  Educate and train both Personal Assistants and people with disabilities in the acquisition of positive attitudes and skills pertinent to the realisation of efficient services.

Our work is carried out within the social model of disability with an emphasis on the philosophy of Independent Living. This means that GDIL is run by people with disabilities for people with disabilities.

GDIL works from the premise that people with disabilities have control over their own lives and have all the information needed to make their own choices. The Independent Living movement aim to support people with disabilities in making those choices under the concept of **“Nothing about us – without us”**.

Vision Statement

According to the principles of Independent Living - Choices, Rights, Empowerment and Control - we, in all our diversity, will work in solidarity to realise justice, equality and respect across the whole spectrum of the lives of people with disabilities.

Mission Statement

The mission of Greater Dublin Independent Living is to bring about real change in the lives of people with disabilities in order to achieve true Independent Living. We will work to ensure that the principles of Independent Living, - Choices, Rights, Empowerment and Control - are intrinsically rooted in the thinking, policies, strategies and actions of all stakeholders.

Independent Living (IL)

The current status of IL and some of the challenges facing disabled people as they engage with independent living

In Dublin, a growing number of people with physical disabilities are living independently. There has been a desire for a move away from institutional and/or family accommodation and increasing availability of educational and job opportunities for disabled people have increased expectations and desires for equality of access.



To experience independent living, people with disabilities (who are referred to as Leaders) obtain services from the HSE and their agencies in the form of personal assistants (PA.) International best practice has seen people with disabilities manage their own service with personal budgets and access to independent living funds. Some people in Dublin access and arrange their own services, or are engaged in hiring their own staff with a service provider and directing their lives and support accordingly.

However GDIL have increasingly become aware of the lack of supports for people with disabilities to manage living independently. Many have attended mainstream school and university and have not met other people with disabilities who live independently; others have attended services which do not promote independence. There is a significant deficit in community/support work and ancillary services for adults with physical disabilities and many of these are not led by people with disabilities themselves and so do not come from a model of inclusion.

Many members report isolation and lack of support in their role as a manager of their services, difficulties in conflict resolution with staff and service providers and problems in the organisation of rosters and obtaining relief staff.

Other barriers towards independence include accessing information on the rental, purchase and adaptation of housing, mobility access problems, double discrimination due to ethnicity or race, gender, sexuality, marital status or socio-economic background. Also having significant disabilities means for many that they are unable to cook or perform household maintenance or manage financial affairs and would never have been shown how (everything would often have been done for them before) and so cannot direct their staff to do so.

There have also been requests for support and information on obtaining services from housing providers, FAS and education providers in supporting independence – resources are not currently available to provide this support.

People with disabilities who move from a family/residential setting to an independent setting often experience a sense of isolation and they often require personal development skills and confidence building skills in order to engage with the mainstream society. GDIL aims to provide the means through social interaction and Assistive technology to break down these isolating factors in the community, without the constraints of an institutional setting.

GDIL have been developing information and professional advocacy services for people with disabilities and have recently merged with the Dublin Leader Forum – a voluntary support group of leaders which provided social and information-sharing activities for people with disabilities living independently. The organisation also hosts a Citizens Information Board professional advocacy project – the **Dublin Leader Advocacy Service**. The advocacy service has identified an urgent need for support services for people with disabilities living independently.

Through the FAS (Community Employment) scheme we have developed a support role for people with disabilities in managing PA's they hire themselves or who are provided by other agencies.

GDIL are also in the process of establishing peer support groups in 4 locations around Dublin that will allow for this sharing of information, reduction of isolation, capacity building, identification of local service-gaps and individual & collective planning in order for people with disabilities to reach their potential in the community.

The other main activities of the GDIL organisation are:

- Provides information on how to achieve independence in society
- Peer support for its members

- Undertakes access audits of the built environment and advises on ways to improve accessibility.
- Provides advocacy for individuals and groups (through CIB funding)
- Lobbies for change to legislation to remove barriers to independence (e.g. Planning Laws)
- Provides a light maintenance scheme to provide support to disabled people in their homes to support their ability to remain in the community (through FAS Community Employment funding)
- Represents the interests of people with disabilities to various statutory & community fora.
- Organises seminars on Independent Living
- Continuous develop the existing programs and initiate new programs (Through HSE Funding)
- Publishes a newsletter on issues that affect the lives of disabled people.
- Provides employment for Disabled people where possible to carry out the above functions.



Owen Columb and James Brosnan – 2 of the Employees at GDIL
(with permission)

GDIL and Grangegorman

Recently, GDIL has expanded with the arrival of the “Dublin Leader Advocacy Service”. One of the challenges we face is the premium on appropriate office space and we would request that The HSE and Grangegorman Development Agency consider allocating some office space to our group.

We make the request with the following in mind:

- We have been based in the Dublin 7 area for the past 15 years
- We consistently strive to improve and develop our services so local disabled people and those in the wider Dublin area have access to appropriate and current information on Independent Living.
- We employ people with disabilities to perform the functions of our activities. We do this through a mainstream process, mindful of previous institutionalisation settings.
- We have engaged with all local agencies and community groups to promote rights for disabled people in mainstream society and have advised many on how they can make their spaces and services more accessible.
- Our Board members and employees are predominantly people with disabilities who, through peer advocacy are acutely aware of the requirements and challenges that face disabled people in the community.

We currently operate out of 3 locations in the city centre as the space in any one of the offices is not sufficient for our needs. These premises are located at:

1. MACRO Resource Centre, 1 Green St., D7
2. National League of the Blind of Ireland, 21 Hill St., Dublin 1
3. CIL Carmichael House, Dublin 7

Adding to that the cost of ground floor space requires that two of our locations are in accessible offices on floors above ground level. While the offices are accessible, the safety of our clients and employees means that we had to take the third premises which is a space borrowed from a sister agency – CIL Carmichael House – so that some disabled employees can have easy egress in the event of an evacuation.



Having our staff and services spread over 3 locations is not efficient and does not lend itself well to developing the best links possible between the services and staff. We require a space where we can all work under the one roof, towards the one goal of improving the lives of disabled people who live in mainstream society.






Having the staff so spread out means it is difficult for the manager to support each staff member appropriately and having everyone together will allow us to improve the efficiency, morale and productivity and ensure value for money for our funders.

With this in mind we would request that should our application for space be considered we would require a ground floor space to ensure we can safely and quickly get everyone out of the premises in the event of an evacuation.

An Outline of our Space Requirements:



We would require a space of between 1500 and 2000 sq. feet in order to bring the staff and services from the 3 current locations into one.

-  We have the means to pay rent, however we would request that you would take into consideration the nature of our business and the financial restrictions that come to bear on us as our resources are very limited.
-  We would like to be in an accessible part of the development where disabled staff, clients and guests can find the building easily.
-  We would request approx. 6 accessible parking spaces as close to the building as possible.
-  We would like if there were accessible toilet facilities within the space to avoid long journeys to communal facilities.
-  We would require the normal office facilities of power, water and phone line access.

We have always proven ourselves to be participatory tenants and have always endeavoured to feed into any discussion or forum for common objectives of the premises that we occupy and we would be pleased to have the opportunity to assist in the development of Grangegorman also.

In relation to the rest of the development we would ask that GGDA take into consideration

- The egress of disabled people is a challenge that we are currently engaging in with some local authority fora to ensure buildings are designed with safe egress for all people who use a building – staff, guests and clients. We would request that Grangegorman Development Agency procure elevators that can be used in the event of a fire.
- GGDA may also consider engaging an access consultant as there are many aids and appliances, signage and safety features that can be installed at the building stage which will make the building easier to navigate for disabled people as they get into, around and out of all of the buildings.
- GGDA should ensure all signage is disability proofed for colour, texture, shape and size to ensure it is useable by all.
- There should be ample accessible parking spaces dotted throughout the development.
- There should be accessible areas at reception desks for wheelchair users.

- There should be loop systems in place for people with hearing impairments for announcements and for dealing with the public reps of the development.

- The HR department should try to ensure there is provision made for employing local disabled people in order to reduce the unrepresentative number of unemployed disabled people.

- Any sports/recreation facilities should be inclusive of disabled participants.

- Any educational facilities should be accessible to disabled students.

- Doorways, corridors and turning spaces should allow for more modern motorised wheelchairs which require more space than the manual wheelchairs.

- There should be an accessible alternative to fire alarm noise such as strobe lighting, floor directional lighting or portable buzzer systems.

- Car Park entrances should allow for taller than normal vehicles that may be carrying wheelchair passengers.

- Promotional materials for the GGDA development should be produced in accessible formats.

- The floors and outside grounds should be constructed with appropriate tactile paving for people with visual impairments.

We feel that this development has enormous potential with regard to developing a community within the city that will show how all community groups and agencies can link together to improve the Dublin 7 area and greater Dublin city community and we want to help you to ensure that disabled people feel that this is their space as much as everyone else's.

We are available to meet to discuss this proposal at any time and if there are other ways that we can help in forming the future for the Grangegorman development we would be happy to feed into any of the processes.

We thank you for the opportunity of having a say in the development of the Grangegorman area hope that you look favourably on our submission.

For further correspondence please contact

Michael Ryan – michaelryan@dublincil.org
 Phone - 087-2371295

Cllr. Nial Ring

**Councillor Nial Ring BA, FCCA, LIB, Dip. FSL.
Certified Accountant**

70 Ballybough Road,
Ballybough,
Dublin 3
Ireland

RECEIVED
05 DEC 2010

Tel: + 353 1 823 0510 Mobile: + 353 87 248 9372 Email:
nialring@eircom.net

Ronan Doyle,
Communications Officer,
Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7.

2nd December 2010.

Dear Ronan,

Re: Submission on the Draft Strategic Plan for development of
lands at Grangegorman.

I welcome the publication of the GDA Draft Strategic Plan for
Grangegorman and detail hereunder my submission in respect of
same.

At the outset, let me put on record my absolute support for the proposed
development and also mention that, as a public representative of the
area, I am delighted with the level of information, consultation and
access given to both me and my constituents by the GDA as the process
has evolved. The development represents a wonderful opportunity for
quality development in the inner city and the creation of a new quarter in
the heart of the city. As someone born and reared in the North Inner
City, I am particularly excited by this development and the positive
impact it will have on the area and the local population.

There are three main areas on which I wish to comment:

PRIMARY HEALTH FACILITIES.

The recommendations of the Grangegorman Neighbourhood and Primary Care Area - Health Needs Assessment, completed and published in April last contain many Area Specific Recommendations and I would hope that many of the twenty four recommendations are implemented.

Specifically, I would like to submit a proposal that the proposed Primary Care Facility be upgraded to include a Rapid Injury Clinic/Accident and Emergency Dept. on the lines of that operating in Smithfield by the Mater Misericordiae University Hospital (the Mater). The provision of such a facility would enhance the proposed recommendations and the presence of what effectively would be a standalone Accident and Emergency Department (possibly aligned to and supported by the Mater) would be of immense benefit to the residents of the area as well as the student population on campus. The added benefits would include less dependence on transport services to the Mater, (Recommendation No. 10), less reliance on or need for a 24 hour D-Doc service (Recommendation No. 4) and, in light of the demographics of the area and its aging population, a level of comfort and security to the elderly of the area.

At the Dublin City Council Central Area Committee meeting of 13th July last, local councillors were give a presentation of the Grangegorman Project by Philip L'Estrange which was informative, thorough and professional. I raised the question of the possibility of a satellite Accident and Emergency Service on the HSE facility with Philip at that stage, and was encouraged that he thought that such a facility could be a possibility and could be considered. I remain convinced that the provision of such a facility would have a hugely positive effect for the area and for that reason I am including this in my submission.

Therefore, I submit that the Socio-economic Objectives, specifically Number 2, should include a specific reference to the provision of a Rapid Injury Clinic/ Satellite Accident & Emergency Department.

EDUCATIONAL OPPORTUNITIES.

Obviously the location of the DIT on campus is most welcome and I would submit that the Strategic Plan includes a strategic Socio-economic Objective which not only ensures educational opportunities for the sections of the community that have been unable to access third level education (Objective No. 1), but which specifies and promotes positive discrimination in the regard. In addition, the Social inclusion model vis a vis education as developed and implemented by the Dublin Docklands Development Authority (DDDA) should be examined as a possible best practice model to be adopted by the GDA.

LOCAL LABOUR.

I would submit that Socio-economic Objective number 4 and 5 be expanded to include specifically a Local Labour Charter whereby both at construction and operational stage GDA will adopt a policy whereby an agreed percentage of jobs created (say 20%) will on offer to residents of the area in the first instance and thereafter in its hinterland (to be defined). While it could be argued that such a policy may have legal ramifications, a precedent exists in the DDDA Master Plan 2008.

TRANSPORT.

I would submit that, in finalising the Strategic Plan, the GDA should expand on how the site will be served by public and private transport the links to bus routes. Also, the plan should detail how the provision of cycle ways will connect to the planned citywide network of cycle routes.

HISTORICAL CONTEXT.

I would submit that the Strategic Plan should also include specific reference to how the GDA proposes to identify, acknowledge and record local history, culture and uniqueness of the area.

I look forward to the completion of the Strategic Plan and request that the above points are considered as part of the finalisation process.

In conclusion, I wish to commend the GDA team on the production of such a high quality Draft Strategic Plan which augurs well for the quality, content and professionalism of the finalised document.

Many thanks for taking the time to read and evaluate my submissions and suggestions.

Kind regards,

Is mise le meas,

A handwritten signature in blue ink, appearing to be 'Nial Ring', written in a cursive style.

Cllr. NIAL RING P.C.



SUBMISSION

ON

GRANGEGORMAN DEVELOPMENT AGENCY

DRAFT STRATEGIC PLAN 2010

DECEMBER 2010

Rathdown Road and District Residents Association
Hon. Sec., 9 Charleville Road, Phibsborough, Dublin 7.
Email: rddras@gmail.com

Introduction.

The Rathdown Road and District Residents Association understands and appreciates the design concepts behind the Draft Strategic Plan, and congratulates Grangegorman Development Agency and Moore Ruble Yudell on the awards which the Masterplan has already received. The Association is prepared to welcome DIT to the neighbourhood, and to embrace the very significant changes that the development of the Grangegorman site will bring to our neighbourhood. It welcomes the upgrading of the HSE facilities on the site, and looks forward to the Educate Together Primary School having a permanent home in Grangegorman.

However, there are a number of issues relating the Draft Strategic Plan which are causing grave concern to the Association. They may be grouped under the following headings:

- A. Building heights and their relationships to adjacent houses.
- B. Transport, vehicular access to the Campus and car parking
- C. Vehicular traffic and access to the site during the construction phases.
- D. The provision of Student Housing.

A. Building heights and their relationships to surrounding houses.

There are grave concerns about the impact of the proposed Draft Strategic Plan on adjacent houses on Rathdown Road, Marne Villas, and Upper Grangegorman/Orchard Terrace. We understand that it is intended to use a Strategic Development Zone (STZ) procedure, which will determine the outline of the buildings as they will be constructed, setting their locations, footprints and heights. Individual buildings will then be the subject of subsequent Planning Applications. Once the Applications are within the parameters set in the STZ, permission will be granted, with no recourse possible to An Bórd Pleanála. It is essential, therefore, that the concerns of the local residents are addressed now and incorporated into the Strategic Plan.

There are particular concerns at the north-eastern corner of the site. The buildings here are shown as 4½ storeys (Academic Expansion), 5½ storeys (Engineering), 6 storeys (Academic Expansion) and 6½ storeys (Engineering). From approximately 20m from the boundary with Rathdown Road and Upper Grangegorman, the land falls away by some 3 to 4 metres, with the result that the floor levels of the existing houses are 3 to 4 metres below the ground on the Grangegorman site generally. Consequently, the proposed buildings at this part of the site are, in effect, 5½, 6½, 7 and 7½ storeys high, respectively, relative to the existing 2 storey houses, and at a distance at the nearest point of only 20m.

Two Site Sections have been prepared (Diagram 1), based on the Section shown on page 4.46 of the Draft Strategic Plan. They illustrate how the proposed buildings would tower over the adjacent houses, dominating them visually and seriously overshadowing them. Such a great disparity of scale is not acceptable and is not consistent with the proper planning and development of a Residential Conservation area. The disparity is all the more serious in that the larger buildings would be in educational use, i.e., non-residential, causing serious overlooking problems,

There are also concerns about the height of the 4 storey building on the corner of Rathdown Road and Marne Villas. A four storey building with a non-residential use is located due south of houses on Marne Villas, and only 26m away from them, causing an unacceptable level of overlooking and overshadowing.

A similar situation arises at the rear of Upper Grangegorman/Orchard Terrace, where there is a four-storey building at a distance of approximately 29m from the rear wall of the terrace of houses. The land on the GDA site in this area is higher by approximately 1.5 to 2 metres.

The consequential impact on the amenities of the adjacent houses is demonstrated by Diagrams 2-8, which illustrate the very serious overshadowing of the houses which would result from the construction of the buildings in their proposed form¹. The Diagrams prepared show the shadows cast by the proposed buildings² at 15.00, 17.00 and 18.00 on 21st of March and September; at 15.00 and 17.00 on 21st June;; and at 12.00 and 14.00 on 21st December³. The effect for intermediate times and dates can be interpolated from these samples.

It is clear from the diagrams that the impact on the adjacent houses is very considerable, and would probably be rejected by the Planning Authority as not being in the interests of the proper planning and development of a residential area. It is also worth noting that the existing layout results in the proposed Primary School and its grounds being overshadowed for significant parts of school-time.

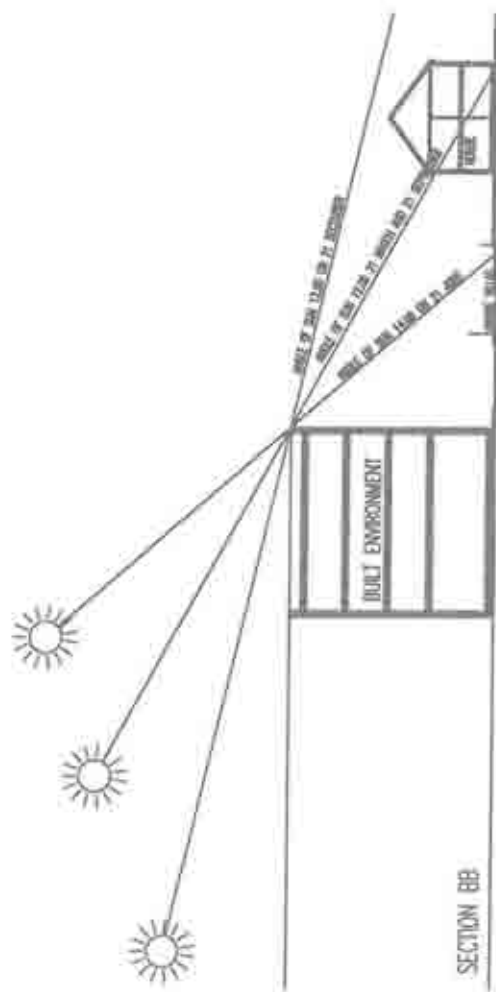
It is deeply disappointing that the Draft Strategic Plan, which repeatedly refers to taking the needs of the local community into account, was prepared apparently without taking into consideration that the adjacent houses are at a lower level than the GDA site generally, and that no importance was placed on the amenities of houses themselves. Either a study of the overshadowing of the existing houses was carried out, and the impact dismissed, or no such study was carried out. Either scenario is an indictment of the design process, and tends to undermine confidence in the GDA's repeated assertions of concern for its neighbours. Furthermore, the site is very large "extending to 30 hectares (73 acres)", offering the opportunity to locate taller buildings towards the centre of the site and of lowering the heights of those buildings near the perimeter in order to minimise the loss of amenity to the existing adjacent houses.

We submit that a major revision of the Draft Strategic Plan is essential, prior to its submission to Dublin City Council for Planning Permission. The rearrangement of the layout should provide for buildings that step down to no more than two stories near the north-eastern site boundary with Rathdown Road. Likewise, the proposed four storey building on Lower Grangegorman which adjoins the existing stone "Clocktower" building should step down to two stories at Marne Villas. The same applies to the four-storey building proposed to the south-west of Orchard Terrace.

¹ The shadows are based on the assumption of floor to floor heights of 3.5m, as shown on the Section on page 4.46 of the Draft Strategic Plan. However, elsewhere in the Plan, on page 4.59, it suggests that a floor to floor height of 4.0m is the norm for "general academic buildings" and "laboratory and research buildings", while page 4.63 shows a possible floor to floor height of 4.5m. If these floor-floor heights apply, the overshadowing and overlooking becomes significantly worse.

² Shadows shown are cast at the ground-floor level of the houses.

³ Sun elevations and azimuths are sourced from www.SunEarthTools.com.

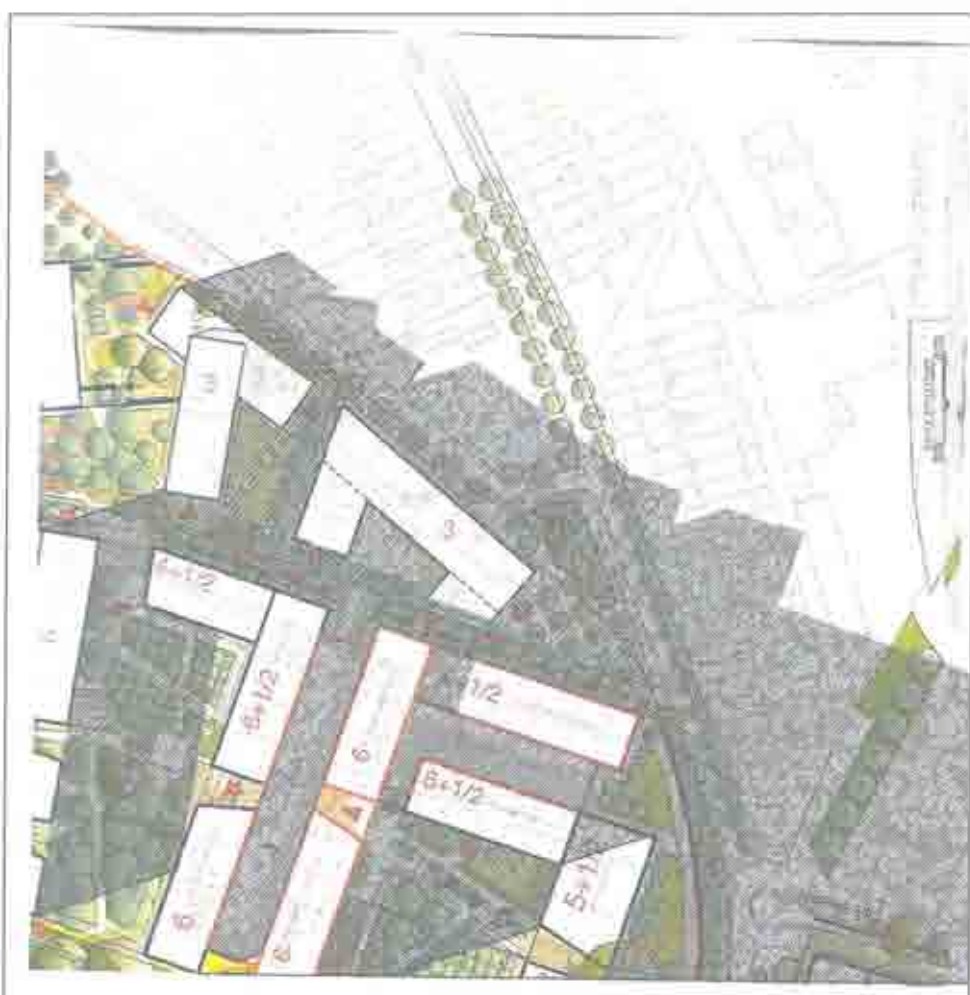


CRANKED SECTION AA BASED ON GDA DRAWING

SHADOW CAST
15.00 ON 21 MARCH, 21 SEPTEMBER



SHADOW CAST
17.00 ON 21 MARCH, 21 SEPTEMBER



WITH SHADOWS ON 1.5M PITCH TO 10.00M. SHADOWS IN THE PLAN ARE TO INDICATE AT THE SCALE

SHADOW CAST
18.00 ON 21 MARCH, 21 SEPTEMBER

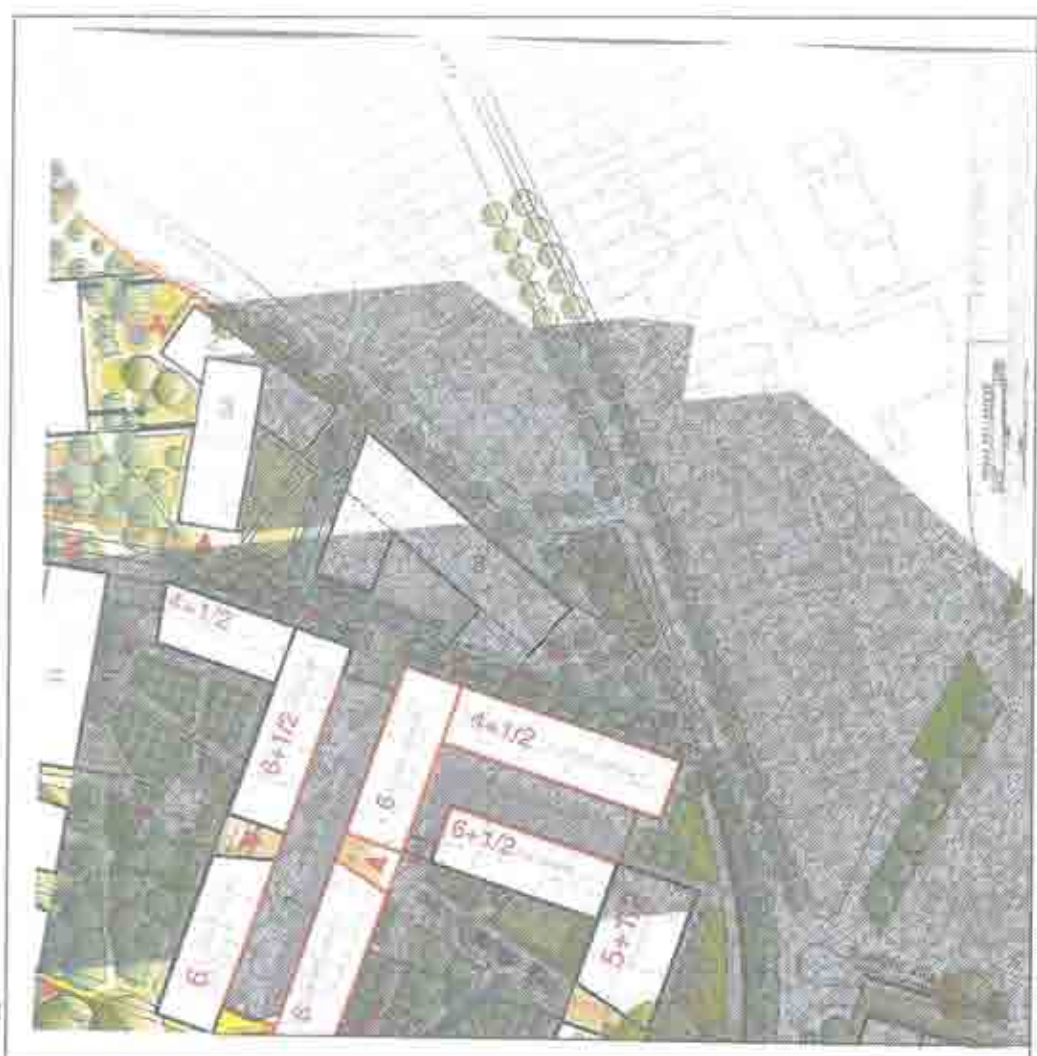


DIAGRAM 3

SHADOW CAST
15.00 ON 21 JUNE

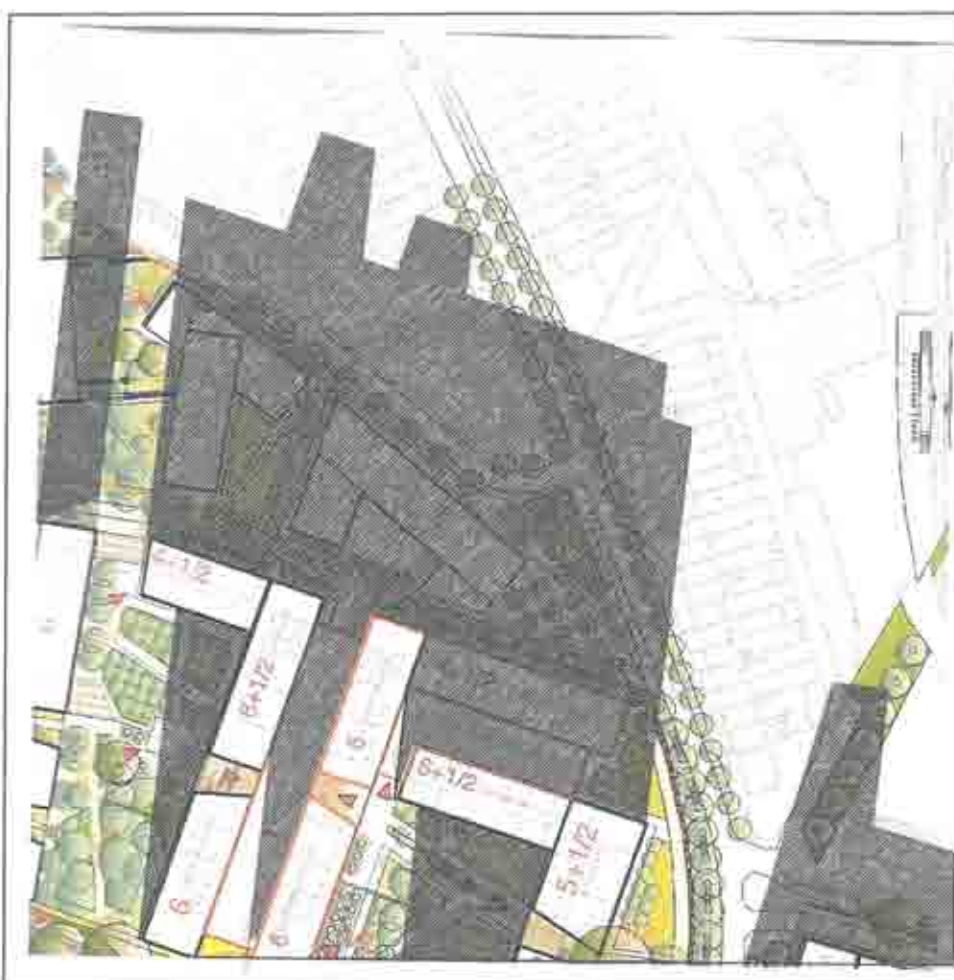


SHADOW CAST
17.00 ON 21 JUNE

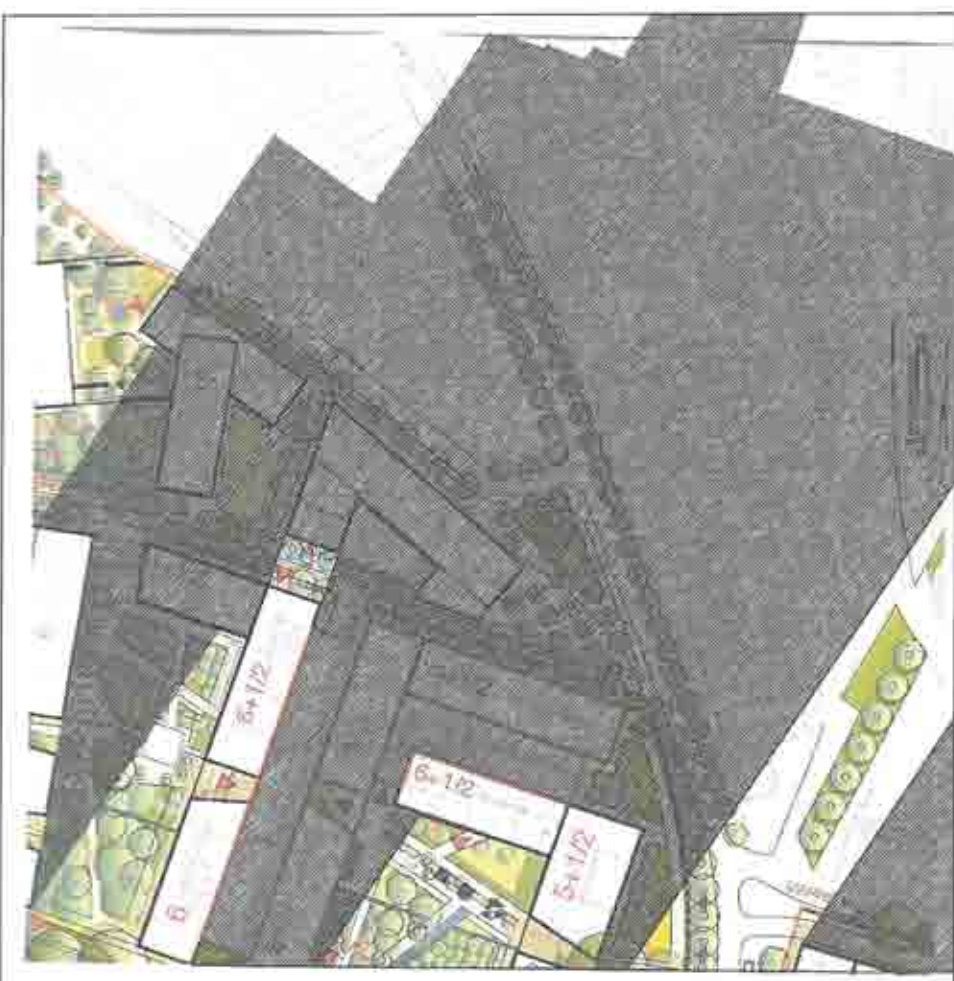


NOTE: SHEDS ON 3RD FLOOR TO FLOOR, ELSEWHERE IN THE PLAN, A.M. IS SUGGESTED AS THE NOW

SHADOW CAST
12.00 ON 21 DECEMBER



SHADOW CAST
14.00 ON 21 DECEMBER



NOTE: BASED ON 3.5M FLOOR TO FLOOR. ELSEWHERE IN THE PLAN, 4.0M IS SUGGESTED AS THE NORM

SHADOW CAST
15.00 ON 21 MARCH, 21 SEPTEMBER



SHADOW CAST
17.00 ON 21 MARCH, 21 SEPTEMBER



NOTE: BASED ON 0.5M FLOOR TO FLOOR. ELSEWHERE IN THE PLAN 4FM IS INDICATED AT THE WIDE

SHADOW CAST
15.00 ON 21 JUNE



SHADOW CAST
17.00 ON 21 JUNE



NOTE: BASED ON 3.0M FLOOR TO FLOOR, ELEVATIONS IN THE PLAN, 4.0M IS SUGGESTED AS THE MAX

SHADOW CAST
15.00 ON 21 DECEMBER



SHADOW CAST
17.00 ON 21 DECEMBER



NOTE: BASED ON 3.5M FLOOR TO FLOOR. ELSEWHERE IN THE PLAN, 4.2M IS SUGGESTED AS THE NORM

DIAGRAM 8

B. Transport, vehicular access to the Campus and carparking.

The Association supports Movement Aim 1 of the Draft Strategic Plan “To ensure the provision of the necessary infrastructure and services to facilitate the maximum usage of sustainable modes of transport, such as walking, cycling and public transport”. The provision of the Luas Line BXD is an essential component if this Aim is to be realised.

Movement Objective 2 of the Draft Strategic Plan states that “GDA will develop a Mobility Management Plan for the Quarter and a comprehensive review of local traffic impacts and mitigation measures”. It is surprising that such a Plan would not have formed part of the design of the overall Strategic Plan for the Grangegorman site, given the very large scale of the development, and the location of the site in a residential area. We submit that it should have been prepared in conjunction with the Draft Strategic Plan, and informed its development. An assessment of the traffic impact on the local community, both at the construction stage and on an ongoing basis, should have been central to the design process, if GDA was serious about its expressed interest in and concern for the local community. It is not indicated when the Mobility Management Plan will be developed, or whether it will form part of the Planning Application.

There are two major traffic arteries that serve the Grangegorman Development Agency site: North Circular Road and Constitution Hill. Vehicular access to the Campus, including both cars and service vehicles, should be predominantly from these arteries, with access from the minor residential roads such as Rathdown Road, Orchard Terrace, Upper Grangegorman and Lower Grangegorman restricted to emergency vehicles, in order to minimise damage to residential amenity.. Access Objective 1 states “GDA to secure a major public point of entry to the Quarter through CIE and Dublin City Council lands at Broadstone”. It is worrying that, at this late stage, that GDA does not have the agreement of third parties to allow vehicular access from Constitution Hill This vehicular access is essential to the project; without it the impact on the local residential streets would be intolerable.

Notwithstanding the lack of the Mobility Management Plan and the information about the type and number of vehicle movements per day that research for the Plan should have produced, the Environmental Report entitled “Evaluation of Significant Environmental Effects of the Grangegorman Strategic Plan” concludes that the impact of Movement and Transportation on Air Quality have a “Very positive/neutral impact”; on Climatic factors would have a “Positive impact; and on Population and Human Health have a “Positive impact”. There is no evidence put forward to back up these assertions. The Environmental Report makes no effort to assess the level of traffic that will result from locating DIT, HSE facilities and a primary School on the site, nor of the resultant loss of amenity to the adjacent houses..

The Draft Strategic Plan is unclear about the number of car parking spaces to be provided on the site. On page 4.77, the figure of 1,430 underground spaces is mentioned and shown on a diagram, while elsewhere on the same page it is stated that “a provision of around 1,150 car parking spaces is seen as appropriate”. The balance between provision of on-campus parking and the objective of reducing car use needs to be transparently debated in the context of the impact on the surrounding residential roads, were the majority of houses do not have on-curtilage parking and rely on the availability of spaces on the road.

The access points to the underground spaces (bearing in mind that access from Constitution Hill has not yet been secured) are shown on the diagram on page 4.77 as follows:

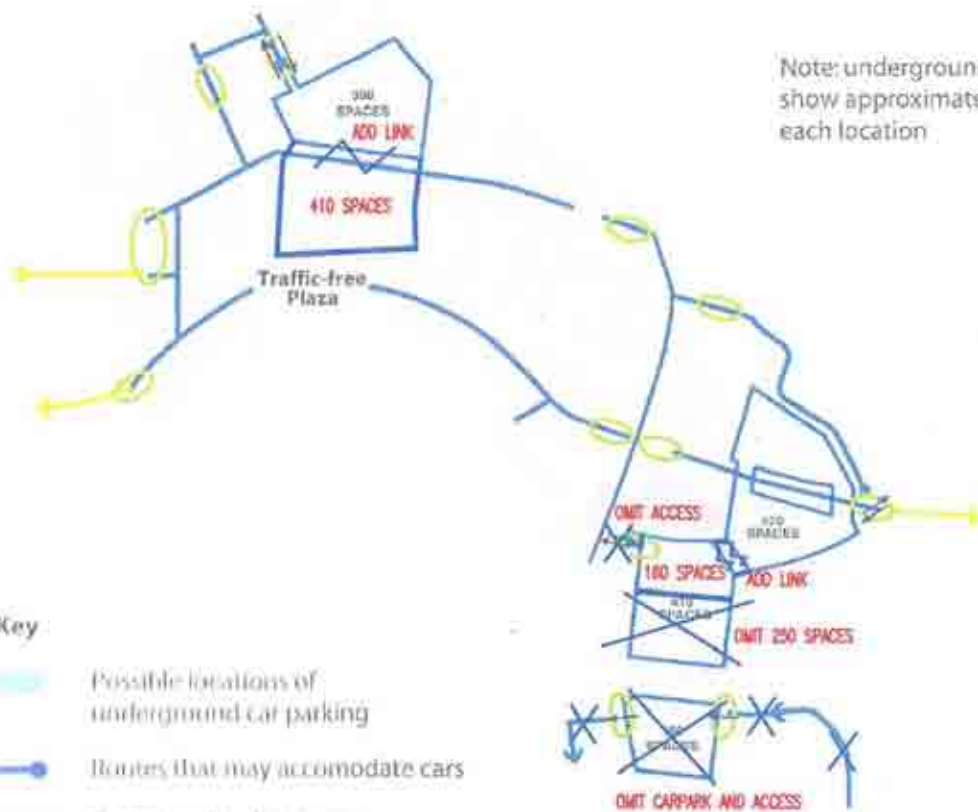
North Circular Road:	390
Constitution Hill:	470
Lower Grangegorman:	410
Morning Star Ave/Lr. Grangegorman:	<u>160</u>
	1,430

Thus 390 spaces of 1430 (29%) of the car parking spaces are located on, and are accessed from, the western portion of the site, which contains two-thirds of the accommodation for DIT and HSE. The car parking provision, and access to it, should reflect this proportion. Although it is not stated, it is obvious that a significant number of these 390 spaces with access from North Circular Road will be for use by the HSE facilities. Consequently, the car parking provision for DIT in the Draft Strategic Plan is minimal on this part of the site where the majority of the DIT buildings are located.

Furthermore, it is envisaged that DIT will occupy the site when Tranche 1 is completed. Tranche 1 provides only 390 car parking spaces (including the spaces allocated to HSE), the balance of 1010 spaces will not be complete at this stage because they are located in Tranche 2. This is a serious deficiency in the Plan, even if it only lasts for three or four years until Tranche 2 is completed. In the current economic environment there is doubt, to say the least, about the completion of any of Tranche 2. For these reasons, it is imperative that approximately 70% of the car parking spaces be located to the west of Lower Grangegorman, and they access should be from North Circular Road.

Diagram 9, based on the Vehicle Access Diagram on page 4.77 of the Draft Strategic Plan shows how a more reasonable and realistic disposition of car parking on the site:

- An enlarged carpark with 800 spaces is proposed on the western portion of the site, with access from North Circular Road. 410 spaces are transferred from the carpark on the eastern portion of the GDA site. Access barriers within the carpark could differentiate between spaces allocated to HSE and DIT.
- Access to the car parking spaces to the east of Lower Grangegorman would be from Constitution Hill. The 410 spaces in the centre carpark is reduced to 160, and it is linked to the 470-space carpark. Internal access barriers could differentiate between different users.
- The 160 spaces at the south east of the site would be eliminated.



Note: underground car parks show approximate figures at each location

Key

- Possible locations of underground car parking
- Routes that may accommodate cars
- Opportunities for access through 3rd party lands
- Control point

PROPOSED UNDERGROUND CAR PARKING

DIAGRAM 9

C. Vehicular Traffic and access to the site during the construction phases.

The proposed Construction Management Plan referred to in Delivery Objective 4 of the Draft Strategic Plan must address the crucial issue of construction traffic. An Taoiseach, Mr. Brian Cowan, stated at the recent launching of the Plan that 70% of the 22,000 DIT students would be on campus by 2016. It is realistic to assume, taking into account the planning process involved, that construction work will not commence before latter half of 2012. This indicates that the construction of 228,000sqm of buildings will be constructed in a 4-year period. The alternative of a longer, less intense, construction phase is equally daunting. The potential negative implications for the local residents, which include noise and vibration and hazards for pedestrians and motorists, need to be discussed at this stage, in conjunction with the preparation of the both the Construction Management Plan and the Mobility Management Plan. The Plans must form part of the Planning Application, so the local residents will have some recourse in the event that its terms are breached during construction.

The Construction Management Plan should deal with the following issues, among others:

- Specify the access routes for construction traffic, limiting them to North Circular Road and Constitution Hill, other than in exceptional circumstances.
- Address issues of phasing of construction so that difficulties do not arise in gaining access to specific building sites within the Campus, resulting in the necessity of using residential roads for access.
- Provide adequate on-site parking for construction staff working. Local residents recall that during the construction of the major development of Smithfield, construction staff regularly parked as far away as Lower Grangegorman.
- Specify permitted working hours and permissible noise levels.

It is difficult to understand how the Environmental Report could have been credibly prepared in the absence of the Mobility and Construction Management Plans and the information it would have provided, for example, about the number of truck movements per day. The Environmental Report makes reference to traffic noise on page 15 under the heading of Key Environmental Issues: "Traffic generation and the implications for noise and air quality as a result of the implementation of the Strategic Plan;". It goes on to acknowledge that "... there is potential for disturbance to neighbours during the construction and operational phases of the development" and that "the construction phase is the more significant in this regard" (Chapter 6, page 47). The Report does not quantify the implications and disturbance. The choice of Noise Measurement Locations (Chapter 6 page 47) is curious. While Location 3 at North Circular Road is an obvious one, the other two locations chosen defy logic. Kirwan Close may have a relevance for noise emanating from the site, although it is furthest away from building operations, being at the other side of the open space provision. However, it is irrelevant in relation to construction traffic accessing the site. Location 2 at Great Western Square is so far away from the site and nowhere near an access route as to be entirely irrelevant. Locations at Orchard Terrace, Rathdown Road and Upper and Lower Grangegorman would have been more appropriate.

The statement that "the main source of noise are building services and delivery operations within the site" fails to take into account the impact of heavy construction traffic would have on adjacent the residential amenities of the minor road which adjoin the site, i.e., Rathdown Road, Upper and Lower Grangegorman, Orchard Terrace and Marne Villas.

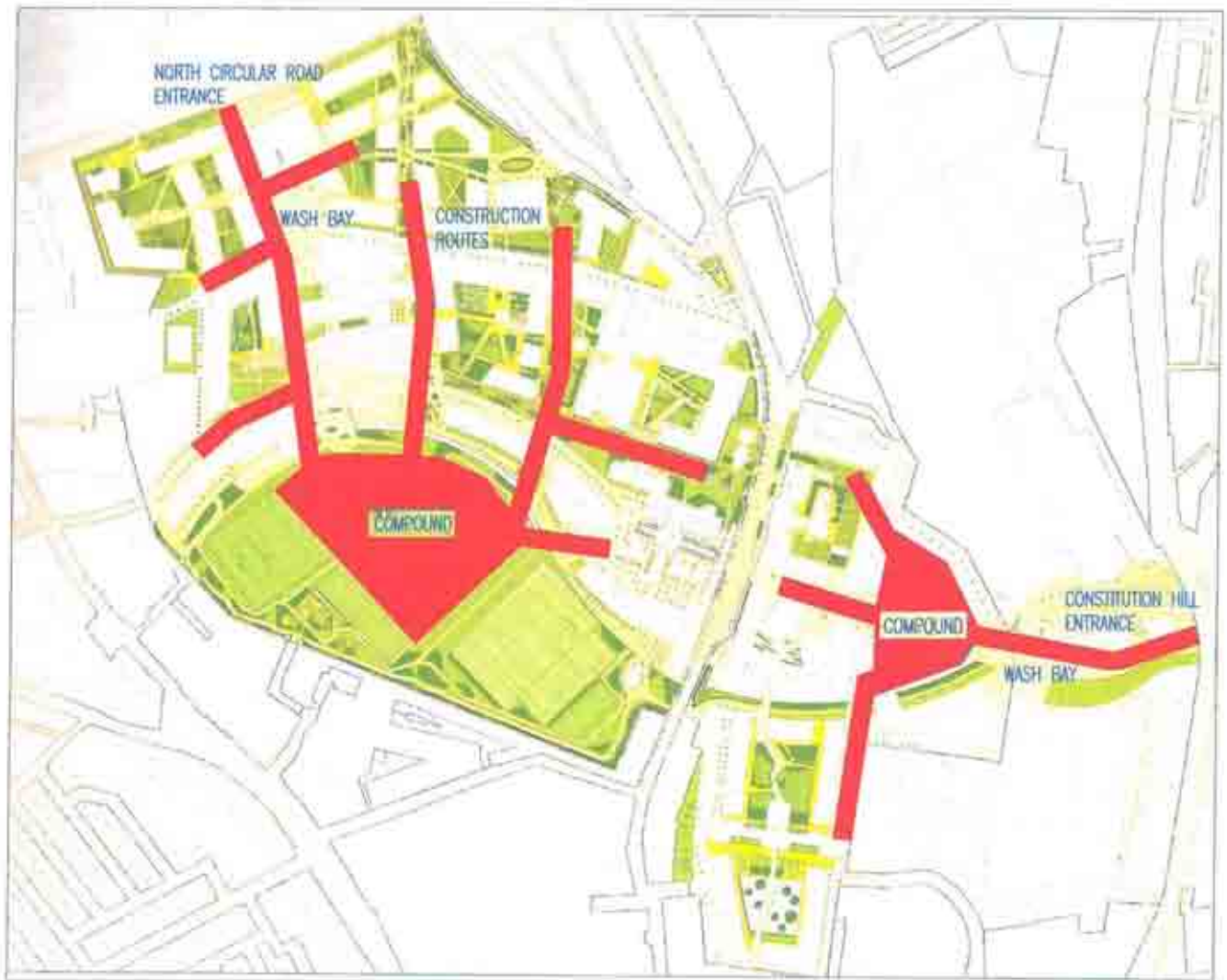
The following blithe conclusion is reached in the Environmental Report on the impact of the Development Delivery Plan on "Air Quality" is a "Neutral impact". There is no evidence put forward to back up this assertion. The Environmental Report makes no effort to assess the level

of construction traffic, including the number of truck movements per day, that will be necessary to implement the Draft Strategic Plan. There is no discussion of the impact noise and vibration on the local population and housing stock.

Restriction of construction traffic access to the two entrances at North Circular Road and Constitution Hill is essential for the following reasons:

- Very high levels of heavy construction traffic can be anticipated.
- The amenities of the residences on minor roads such as Rathdown Road, Orchard Terrace, Upper and Lower Grangegorman and Marne Villas would be protected from noise, vibration and hazard to pedestrians and motorists.
- There are two Primary Schools in the immediate vicinity of the GDA site, one at Kirwan Street and the other at Fitzwilliam Place off Lower Grangegorman. Significant pedestrian traffic of schoolchildren and parents occurs on these roads each weekday in the mornings and in the afternoons. Heavy construction traffic would present serious hazards to child and adult pedestrians alike.

Diagram 10 illustrates how construction traffic might operate and how the site might be organised during the construction phase, using the “hand motif”, which underpins the Draft Strategic Plan, as an organizational basis. Two compounds are proposed, one with access from North Circular Road which deals with Tranche 1, and the second with access from Constitution Hill which deals with Tranche 2. The proposal would lead to an orderly control and distribution of construction traffic, both around and within the site, and provide parking for construction staff, site offices and for materials storage areas. It would be easy to secure the compound.



CONSTRUCTION TRAFFIC MOBILITY PLAN

DIAGRAM 10

D. Provision of Student Housing.

Rathdown Road and District Residents Association welcomes the arrival of DIT and the new HSE facilities to Grangegorman. Access to the Campus and its facilities and grounds will be of benefit to the local community, and we welcome the energy and activity that DIT will bring.

The arrival of 22,000 students, together with approximately 2,600 teaching and ancillary staff, will have an enormous effect on the Grangegorman area, and particularly on the roads immediately adjacent to the campus. There are genuine and serious anxieties about the impact that student housing will have on the neighbourhood. The concerns are not centred on the student housing to be provided on Campus, which, we believe will be well managed. The problem arises with in relation to pressures which will develop on the existing housing stock in the neighbourhood of the Campus. Parts of the area around Grangegorman are defined as Residential Conservation Areas in the Development Plan.

At present, there are no planning restrictions on a house being let to any number of individuals. Problems have arisen with this type of letting to students in other cities in Ireland and the UK. Many of us are aware for the serious problems that have occurred in recent years around Queens University in Belfast. In these types of circumstances, it is easy for the educational institution to maintain that the problem is not theirs, as it is occurring outside the Campus. Research undertaken in areas of cities adjacent to third level educational institutions in the UK suggests that when the student population reaches 20% of a community, serious difficulties begin to arise, and that a proportion of 25% “challenges social cohesion”.⁴ In this respect, the data contained in the GDA Environmental Report is relevant. It establishes that the Grangegorman area is “characterised by a higher than average level of students” (p.4) which is shown in Figure 2 to be already approximately 13%. It is clear from this that special measures will have to be adopted early in the process of moving DIT to Grangegorman, in order to protect the local community. The problems reached such a serious level in UK that a licensing system was introduced in 2004 to control the letting of houses to students, and subsequently a planning use-class of a “House in Multiple Occupation (HMO)” was adopted requiring that Planning Permission be obtained for such a letting.

Neither the Draft Strategic Plan nor the Environmental Report even mention, let alone address, this potential population imbalance with its consequential damage to the social fabric of the local community. Nevertheless, the Environmental Report reaches the extraordinary and unsubstantiated conclusion that the “Social infrastructure” of the GDA Draft Strategic Plan would have a “Very positive impact” on Population and Health (Chapter 8, Page 9). A change of attitude to the local community on the part of GDA and DIT is required. A co-operative approach with the local community will be necessary, which will include lobbying for the introduction of a licensing system and a planning use-class for houses in multiple occupation, similar to those adopted in UK.

We note that the Strategic Brief prepared by DIT and published in the Appendices to the Draft Strategic Plan states the following: “Aim to provide accommodation for 20% of the fulltime student cohort” and to “Plan for expanding numbers and a further increase in on-campus living to 30% in balance with supply in surrounding communities” (p.92). However, The Draft Strategic Plan has lowered this figure to “...c. 2,000 bed spaces equating to a provision of approximately 15% of their fulltime students” (p.5.24), and does not appear to make provision for expansion. We submit that this lowering of the number of bed-spaces is misguided, and will

⁴ Balanced Communities and Studentification, Problems and Solutions, National HMO Lobby, 2008, p.9.

increase the pressures on the adjacent housing stock, tending to push the student population above the 20% threshold referred to above.

The phasing of the project as set out in the Draft Strategic Plan exacerbates this under-provision of student housing. As noted previously, the stated target is for 70% of the student population to be in place by 2106. However, the Plan provides for less than half the student accommodation to be constructed in Tranche 1. The response of GDA may well be that a shortfall of student housing for a few years will be of no consequence to the local community. This will not be the case. As soon as the DIT moves to Grangegorman, there will be an instant demand for student housing the locality, putting pressure on the local housing stock. The damage will have been done to the population balance, and it will not be reversed easily. We submit that student housing must be provided in the proportion of 20% of the cohort, and that it must be completed and ready for occupation as they arrive on the Campus. This will involve the construction of a greater proportion of the student bed-spaces in Tranche 1.

In addition to the under-provision of student housing, the Association has reason to be concerned that the provision of student housing on Campus is not a priority for GDA and DIT. The Draft Strategic Plan defines student housing as “Non-Core”, stating that: “In addition, DIT is planning that the following additional complementary facilities (labelled as “Non-Core” as defined in section 8.1.1) will be constructed on a phased basis as funding sources are secured.” The Table which follows includes “Student Residencies” under the sub-heading of “Additional Campus Facilities”. (p.2.11). The Association’s disquiet about the ambivalent attitude to the provision of adequate student accommodation in the Draft Strategic Plan is reinforced by the statement under the heading 4.6.5 “Academic uses in lieu of student accommodation along the serpentine walk” that “the current location of student accommodation may be suitable to serve academic uses”. This equivocation is unacceptable. The Strategic Plan must contain a clear commitment to provide sufficient student accommodation, in advance of the student cohort arriving on Campus, in order to mitigate the impact on the local community. There is “a further potential increase of 30% in the decades ahead” (page 2.9) in DIT student numbers. A similar requirement for student accommodation in advance of future buildings being occupied will be required, and the Strategic Plan should make allowance for this.

Our concern about the provision of an adequate number of student bed-spaces is heightened by the current difficulties being experienced in the development and construction sector, which will make procurement by way of “Commercial Joint Venture” more difficult to achieve.

We will be requesting the Planning Authority to append a Condition to the Planning Permission requiring that student housing to a level of 20% be available prior to the opening and use of the educational facilities on the Campus by DIT, and also that there will be a similar requirement for any future increase in student numbers.

SUMMARY.

A. Building heights and their relationship to adjacent houses.

- A significant redesign of the Campus layout is required before lodging a Planning Application in order to minimise the serious overshadowing and overlooking problems caused at Rathdown Road, Marne Villas and Orchard Terrace.
- Building heights need to be stepped down in the vicinity of existing houses.

B. Transport, car parking and vehicular access to the Campus.

- The Mobility Management Plan must be prepared prior to the Planning Application, and must form part of that Application.
- The Mobility Management Plan needs to address the issues of vehicular access and parking, including at the construction phase, taking into account the significant impact on the local community, and it must inform a redesign of the Strategic Plan
- Vehicular access to the Campus must be restricted to North Circular Road and Constitution Hill, except for emergency vehicles.

C. Vehicular traffic and access to the site during the construction phases.

- The Construction Management Plan must be prepared prior to the Planning Application, and must form part of that Application.
- The Construction Management Plan needs to address the issues of access for heavy vehicle and staff parking at the construction phase, taking into account the significant impact on the local community.
- Access to the site during the construction phase must be restricted to North Circular Road and Constitution Hill.

D. Student Housing.

- A commitment to a provision of student housing of 20% of the fulltime student cohort must be incorporated into the Strategic Plan.
- A commitment that the educational facilities will not be occupied until the student housing is available must be incorporated into the Strategic Plan. This could be done on a phased basis.

There may be reluctance on the part of GDA and its Consultants to spend the time to make the changes to the Draft Strategic Plan which this Submission demands. The Plan may have developed some inertia of its own by this stage, an inertia which must be overcome if the GDA is to honour its oft repeated commitment to a genuine consultative process, where the views expressed by the community are listened to and action taken to accommodate their genuine and clearly demonstrated concerns.

The timescale for considering Submissions from 7th December 2010 to 8th February 2011 when the Board of GDA intend to adopt the Plan (including as it does the Christmas and New Year periods), would appear to be too short to allow for any significant amendment of the Draft Strategic Plan,. We submit that the date for the adoption of the Plan needs to be moved out from the submission date, in order that the serious concerns and recommendations outlined in this Submission can be adequately evaluated and addressed By GDA and its Design Team.

We believe that the Planning Authority will take seriously the issues raised in this Submission. If these concerns are not addressed prior to the Strategic Plan being submitted to Dublin City Council for permission, Rathdown Road and District Residents Association will pursue them vigorously at the Planning Application and Planning Appeal stages.

CAMPBELL SPRAY

From: Campbell Spray
Sent: 06 December 2010 17:45
To: Ronan Doyle
Subject: Draft plan submssion

Hi, I couldn't get through to the address below.

However I would like to ask that the open space is able to be used by the local population asap. Even if it is curtailed somewhat by the building process it would help people too more easily identify with the whole project.

All the best,
Campbell Spray

Fingal Place Resident's Association

Nial Coffey, ARB, B. Arch, BA (Hons),

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Ballinteer,
Dublin 16.

Tel: 01 2166819

Mob: 0879176056

Email: nial_coffey@hotmail.com

Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7.

Email: communications@ggda.ie.

3rd December, 2010

**RE: Fingal Place Resident's Association Written Submission for the
statutory public consultation phase of the 2010 Draft Strategic
Plan for the development of lands at Grangegorman.**

Sirs,

Fingal Place Resident's Association are taking part in the statutory public consultation phase of the 2010 "Public Consultation on Strategic Plan and its Environmental Report for Development of Lands at Grangegorman, Dublin 7". I am writing on their behalf.

Fingal Place Resident's Association object to the fact that Fingal Place is still being considered as an access route to the Grangegorman Development after their concerns were raised in their 2008 submission.

They are disappointed with the dismissive and inadequate response

made by the Grangegorman Development Agency who have paid little attention to their concerns in 2008 or thereafter. They refer to this statement:

"Access from Prussia St/ Manor St/ Stoneybatter is very limited due to the existing urban structure. Fingal Place is one of the few possible accesses to the site. Permeability from this sector would greatly suffer if this access was to be removed from the Land Use plan. A major purpose of this access is to provide access for the local community to the sports and recreation areas. The GDA intends a controlled gated pedestrian access."

They are also deeply concerned with the following statement of the subsequent GDA Draft Strategic Plan 2010 (Para. 5.8.3.1) and find it totally unacceptable:

"The laneway at Fingal Place is a public road and leads to an existing gateway into the fields of Grangegorman. This access way would be suitable as a pedestrian point of entry but due to its relative seclusion would benefit from an appropriate regime of control – perhaps day-time access only. Opening this gateway would allow easy community access to the park landscape and play areas during the day and would also provide a link for staff and students of DIT to the Quality Bus network on Prussia St."

The proposal for an access route on their road is unsustainable development and would degrade the residential amenity of the area by being a bad neighbour. It would create far too many adverse impacts and no thought or concern at all whatsoever has been given to the existing problems that would be exasperated in Fingal Place should this route be allowed.

The basis of Fingal Place Resident's Association submission is outlined in the points listed below which will be diligently considered by the GDA.

Furthermore, due to the fact that Fingal Place is not within the confines of the Grangegorman zoning, but within the jurisdiction of Dublin City Council, all references are made to the Dublin City Council Development Plan Written Statement 2005-2011 (unless otherwise stated) because it takes priority to any other development plan or associated document that some people might think is appropriate.

1. **Car Parking and Transport.**

At present there are insufficient quantities of proper parking spaces in Fingal place and the adjacent Prussia Street. This causes illegal/ nuisance parking and road hazards on a regular basis. The proposed access route would only exasperate the problem and have an adverse impact on the health and safety of pedestrians, cyclists, due to additional unnecessary traffic, vehicles mounting kerbs, on street parking, and turning circles.

The ease of access of emergency and delivery vehicles will also be severely compromised and additional unnecessary damage to property and vehicles will also occur.

The adverse impacts will also spill over onto Prussia street and the QBC causing further disruption and danger when significant activity is taking place within the Grangegorman development due to commuters or sports day activities, etc.

At this point the road on Prussia Street and the QBC are intertwined giving a total width of about 6.0 metres. It falls short of the recommendations in the development plan written statement and should be 10.5m because an additional 4.5m is required for a bus lane (Para 7.5.0) however due to the physical constraints this is not possible.

Unnecessary inefficiencies due to potential blockages will occur and Fingal Place will suffer from overburdened parking, cars reversing on to Prussia Street, or cars Parking on Prussia Street due to sports days, commuter activity, etc.

The proposal should be dismissed because the following objective on Transportation in the written statement will not have been upheld:

"Measures to enhance the Quality Bus Network (QBN) and bus priority are considered essential to improve the efficiency, performance and attractiveness of buses and provide an expanded network with wider benefits throughout the city. This involves giving significant priority to buses in order to reduce both bus journey times and their variability" (Para. 7.3.0)

The effective further narrowing of Prussia Street and its Quality Bus Corridor due to unauthorised/ illegal parking will also have an

adverse impact on road safety to cyclists at this narrow busy road intersection. Due to the reasons described above the proposal should be dropped because the following summarised objectives of the written statement would be severely compromised:

"Bus lanes are to be 4.5m width where possible to allow enough room for buses to pass bikes safely" (Para. 7.5.0.)

and

"Existing junctions must be reviewed to make them cycle friendly" (Para. 7.5.0)

2. Pedestrians.

Due to the physical restrictions of Fingal Place, the overall existing dimensions are narrow and inadequate and already pose as an unnecessary risk to the public. There is an existing footpath of about 1.0m and a laneway which caters for traffic in both directions of about 2.3m. There are also several entrances to houses and property on the laneway.

The proposed access route will make matters worse and would have an adverse impact on the health and safety of pedestrians, cyclists, due to additional unnecessary traffic, vehicles mounting kerbs, on street parking, and turning circles.

In order to make the access way viable, a standard 1.8m footpath would be required together with road laneways of 2.4m in both directions and a rubbing kerb of 0.3m. This would make the gross total to be 6.3m which is impossible because Fingal Place is too narrow and therefore the proposed access way to the Grangegorman development must be dismissed.

3. Crime.

Fingal Place suffers from crime and vandalism because it is cut off from Prussia street due to the narrow lane entrance. This is further compounded by the fact that all of the laneway which is proposed to be an access way is not overlooked and cannot be

informally supervised by the residents of Fingal Place.

Prostitutes regularly take their clients to these areas of Fingal Place where they are not overlooked, together with unwanted alcohol-related juvenile behaviour. In recent years a taxi driver was kidnapped and held in the boot of his car on Fingal Place while armed gun men robbed the Post Office in the Park Shopping Centre on Prussia Street.

The proposed laneway will make the situation worse and contravenes the development plan written statement:

"Safety: Opportunities for vandalism and crime should be reduced to the greatest possible extent, by ensuring that areas used by the public (such as open spaces, footpaths and roads) are overlooked by housing." (Para. 15.9.1)

Due to the proposed increase in pedestrians and the proposed alternative exit, whatever is proposed by the Grangegorman development to overcome crime will be insufficient. The access way will never be overlooked and will always have an increased adverse impact on crime and vandalism on the property and vehicles of Fingal Place. The proposal is unfair and unreasonable and should be dropped from the Grangegorman development.

4. Land Use Zoning.

Fingal Place is located in a distinct area of Land Use Zoning Objective Z1 which is to protect, provide and improve residential amenities. The general objectives for primarily residential areas are:

"to provide a measure of protection from unsuitable new development or certain 'bad neighbour' developments that would either threaten or be incompatible with the overall residential function of the area." (Para. 14.4.1)

The proposed access route would be a bad neighbour for Fingal Place and a threat to the zoning objective for the following reasons:

- (i) The Grangegorman development as a whole has inadequate parking proposals and whatever is proposed by Dublin City Council and their Quality

Bus Corridors or the Development Agency will never deter commuter drivers; drivers who wish to use the development; and drivers who wish to use the sports fields (which incidentally is always a nuisance that is rarely controlled at other sporting locations).

- (ii) There will be significant adverse impact on adjacent bus lanes, transport infrastructure and street parking and would pose an adverse risk to the health and safety of pedestrians using Fingal Place .
- (iv) The proposed access way is not overlooked by Fingal Place and is cut off from Prussia street. It will exasperate the existing adverse impacts of crime and vandalism.

5. Permeability.

The proposed access route from Fingal Place is superfluous and unnecessary. To state that:

" Permeability from this sector would greatly suffer if this access was to be removed from the Land Use plan" (GDA 2008 submission response to the Fingal Place Residents Association.)

is incorrect and should be disregarded. If one were to stand at the entrance to Fingal Place, the extra over time required for access via the main entrance is only a matter of minutes and proves that the potential adverse additional impacts on nuisance parking, crime, adjoining transport infrastructure and the health and safety of pedestrians and cyclists is pointless and unnecessary.

6. Protected Structure

As stated previously, the proposal to make Fingal Place an access route is superfluous and therefore providing new

openings in the boundary wall of Grangegorman will be a needless destruction of the historic fabric of the demesne.

It will be out of character with the neighbourhood and will contravene Policy H2 of the development plan written statement.

"It is the policy of Dublin City Council to protect the curtilage of protected structures or proposed protected structures from any works which would cause loss of or damage to the special character of the protected structure and loss of or damage to, any structures of heritage value within the curtilage of the protected structure." (Para. 10.1.4)

7. Right of Way

The existing door at the end of Fingal Place on the boundary wall has been blocked up for more than 25 years and therefore the right of way must be considered extinguished.

The Grangegorman Development Agency have never submitted any evidence that they have the right of way which is disrespectful to the residents of Fingal Place and this should be furnished immediately.

Conclusion.

The GDA are mistaken in thinking that they can just simply take Fingal Place as an access way into their development. There are far too many ramifications and adverse impacts that the GDA have clearly paid no attention to.

To make Fingal Place an access way to the development is significant development that is either a change of use or a material alteration because there are too many significant adverse impacts which affect parking, transportation, cyclists, pedestrians, crime, and land-use zoning. Most importantly the health and safety of the public is significantly at risk because the existing road way dimensions are inadequate and inappropriate for such a major development.

This part of the development is outside of the demise Grangegorman

and is in the jurisdiction of Dublin City Council because it is zoned Z1. Fingal Place cannot be assumed to be part of a Special Development Zone or Framework Development Area and therefore to decide that the use of Fingal Place is to become an access way is beyond the remit of the Grangegorman Development Agency and the Grangegorman Development Act.

Due to the fact that the proposed access way is a bad-neighbour material alteration of residential zoning, it cannot be concluded with a dismissive response in the 2010 "Public Consultation on Strategic Plan and its Environmental Report for Development of Lands at Grangegorman, Dublin 7" and has to be taken up elsewhere to ensure that the matter is dropped once and for all.

Yours Faithfully,

A handwritten signature in dark ink, appearing to read 'Niall Coffey', with a stylized flourish at the end.

NIAL COFFEY , ARB, B. Arch, BA (Hons)
(on behalf of the Fingal Place Resident's Association.)

John Flannery - St. Brendan's Hockey Club

St Brendan's Hockey Club GDA Development Plan Submission

St Brendan's Hockey Club was founded in 1929 by the staff members and families of St Brendan's Hospital Grangegorman. The Club which is affiliated to the Leinster Branch of the Irish Hockey Association continue to play their home games in the grounds.

The Club attained Senior status in the 1970's and currently has four Men's Teams and two Ladies sides along with a Youths section. The men's side were successful last season winning the Irish Hockey Challenge Cup an All-Ireland competition.

Club membership is comprised of descendents of the founding members working with the HSE facility along with a strong association with the Grangegorman, Stoneybatter and Arbour Hill areas. In more recent times the Club amalgamated with nearby Phoenix Park Hockey Club and now draws membership from the wider areas of Navan Road, Blanchardstown and Clonsilla.

The club is part of the local community working with schools and parents to provide a safe and healthy environment for boys and girls to enjoy sport, be part of a team and make lifetime friendships. Hockey is played from the ages of seven to seventy by Men Women Boys and Girls. All levels of ability are catered for and it is an inclusive sport.

The Club members developed and maintained facilities in Grangegorman preparing the hockey pitch and providing changing rooms. It is the goal and ambition of the club to be part of the unique development in Grangegorman and to strengthen our relationship with the DIT and community to ensure that our unique sport will be played by future generations in Dublin 7.

The Club wish to work with the GDA in providing short term and long term facilities. It is the intention of the Club and the Hockey Administrators to assist the DIT to have hockey as one of its primary sports for students and staff.

The concerns that the Club have are

- : To ensure the continuation of the relationship with Grangegorman
- : The facilities offered are of a standard to provide for the sport
- : The range and use of facilities to replace the existing terms and conditions
- : To secure a legal entitlement commensurate with the current arrangements
- : The interim arrangements during the development phase

John Walsh - St. Brendan's GAA Club

St Brendans CLG Submission in respect of GGDA Draft Strategic Plan 2010

Background

St Brendans GAA club was established in 1920 by staff of the Psychiatric services in Grangegorman. Since then GAA games have been an integral part of the hospital site being a source of enjoyment for both staff and patients for many years. Today the club fields teams in gaelic football and hurling and boasts a membership of almost four hundred people.

The development of the site is viewed as a positive development by club members. Works already commenced have had an impact on the club with the loss of our tradition playing facility known as the top pitch. The club has engaged with both the GGDA and DIT to ensure that the transition to new facilities progresses in a positive manner. Also we consider ourselves to have a partnership with other users in the facilities to maximise the value that the proposed facilities can have for all involved.

Submission

4.2.2 and 4.2.15:- This section discusses making the site as pedestrian friendly as possible. What facility will there be for parking? Members will require easy access to a parking facility. We do not envisage having to pay a fee for this parking.

4.2.5:- Gateway provides address for HSE and DIT. Will there be signposts here? St Brendan's GAA request that signage be put in place here and in other central areas to aid visitors to the club having easy way finding. Signs should include club name in Irish and English and also club crest.

4.2.10:- "Residents will have shared access to the sports facilities on the DIT campus" With a number of interested parties what systems are planned to control usage to provide for existing users given that there will be only one GAA playing facility on site? GGDA and DIT are aware of the needs of St Brendans GAA from correspondence to date.

4.4.15:- St Brendans GAA has serious reservations regarding the potential capacity of a single GAA playing ground to meet the needs of both the club and DIT. We propose that consideration should be given to creating another facility of adequate size to field GAA teams. This space may not always be under the guise of a GAA size pitch but have the potential with movable goalposts etc to be used at times for GAA games. This may involve extending the space proposed for soccer/rugby for such an eventuality.

4.4.16:- The "Gallery Passage" should include a history of the St Brendans GAA club now on site for 90 years. This display to include memorabilia such as club history, photos and examples of medals etc presented over the years. Club administrators should have the scope to amend this section over time.

4.7.5:- The club would request that any artefacts recovered from archives related to the GAA history be returned to club officials or copies of such items be given to the club.

5.3:- St Brendans GAA club will require a formal ongoing feedback mechanism on progress particularly on the progress and funding availability for DIT Tranche 1 which has a direct impact on our well being as a club. The current mechanism via our meetings with the GGDA is acceptable but, meetings need to be planned and not on a needs basis. The club has misgivings, arguably unfounded, regarding the proposed schedule of completion in the current financial climate.

When major milestones are being met e.g. commencement of DIT Tranche 1 we require at least three months written notice of plans. This is in tandem with communications between club committee and GGDA/DIT.

Prior to St Brendans ceasing use on the current playing pitch clear documented evidence must be presented that work commencement is imminent and secure funding is available to complete the works.

5.3.4.1+2:- Package 2H has a delivery target of summer 2016 (DIT Tranche 1). This means that St Brendans GAA and other users of the site will be discommoded for several years. This may be longer given planning delays and funding issues etc. To date there has been no concrete alternative playing ground identified while facilities are absent from the Grangegorman site. As users of the site for over 90 years it is an expectation of St Brendans GAA that the GGDA identify and negotiate terms for use of a suitable facility for this time period. St Brendans GAA club view the coverage of costs in relation to this as responsibility of the GGDA or related parties. Club officials are happy to assist with this process in an advisory capacity.

6.2.4:- St Brendans GAA has serious reservations regarding the potential capacity of a single GAA playing ground to meet the needs of both the club and DIT. We propose that consideration should be given to creating another facility of adequate size to field GAA teams. This space may not always be under the guise of a GAA size pitch but have the potential with movable goalposts etc to be used at times for GAA games. This may involve extending the space proposed for soccer/rugby for such an eventuality.

Usage will be subject to booking procedures. In order to successfully run an active GAA club with an extensive season length and competitions on a number of fronts a long period of booking in advance will be required. We envisage that as long standing users of the Grangegorman facilities any arrangement with DIT regarding pitch use should give St Brendans equal priority in line with DIT clubs during the GAA season. We propose that an advanced arrangement be agreed prior to completion of DIT Tranche 1 which recognises the needs of St Brendans GAA club.

On site facilities currently provide dressing rooms and secure lock up facilities for club equipment etc. We are of the understanding that the dressing room facilities will be for generic use by a number of users. In the new sports facility we propose that a small lock up type facility be provided for St Brendans GAA for gear when out on field and equipment. This would be in the best interests of security of member's belongings. Access to this facility would be restricted to campus management and St Brendans GAA club officials. As mentioned above signage along main campus routes should include St Brendans CLG. We propose that St Brendans CLG crest be mounted in the concourse to the dressing room areas to acknowledge our partnership on usage as well as our long term existence on the site.

As users of the facilities St Brendans GAA are recognise the responsibility of care and maintenance of the pitches and ancillary areas.

As local existing users of the facilities we would envisage access to all new sporting areas swimming pool etc.

7.1:- St Brendans GAA club can play a role in achieving socio-economic aim 4 in the plan. The club provides a sporting and social outlet for the Grangegorman area and beyond. DIT graduates may also benefit from the availability of a GAA club in close proximity to Dublin city centre. Many will remain in the greater Dublin area after graduation and this amenity will provide a sporting, social and cultural outlet.

Conclusion

Many of St Brendans GAA club members are staff and former staff of the health services in Grangegorman. This provides an intricate connection for the club and the overall environment on the Grangegorman site. As a club we view the development as a very positive step for the surrounding area and see the knock on effects as very influential. The above submission addresses our concerns as a club but of course this is a two way process and the club will continue to work with the GGDA, DIT and other existing users to further enhance the experience for all involved.

Donnacha O'Briain (private individual)

Dear Sir/Madam,

I would like to make a submission related to the Draft Strategic Plan for the Grangegorman DIT site. I am a resident in the Dublin 7 area.

My submission relates to the section on Procurement, in which it is stated that the intention is to fund the development through a mixture of Public Private Partnerships (PPPs) and traditional funding methods.

I would like to register my opposition to the inclusion of PPPs as a funding mechanism for the Grangegorman site. Numerous reports have shown that PPPs do not represent value for money to citizens and taxpayers. I cite in this regard the 2003 report of the Comptroller and Auditor General. There have also been concerns raised internationally about the impact of PPPs on quality of service, as well as on workers rights and conditions of employment, particularly with regard to education.

I refer you to this 2009 report by Education International on the role of PPPs in education:

<http://download.ei-ie.org/docs/IRISDocuments/Research%20Website%20Documents/2009-00086-01-E.pdf>

Furthermore, in the case of Dublin city, PPPs have an extremely poor record in relation to delivery of public services - in the case of housing in places like O'Devaney Gardens, and St Michael's Estate, to mention a few examples. Indeed, such is the poor record of PPPs in Dublin city that the elected members of Dublin City Council recently insisted that all references to PPPs be deleted from the City Development Plan and were successful in achieving this. This makes it all the more baffling that PPPs would remain in the Grangegorman draft plan.

In light of the importance of education as a public service, I believe that the burden of proof lies with the Grangegorman Development Agency to show how PPPs would not adversely impact on the quality of education at DIT as well as on the ancilliary services and working conditions on which a publicly funded university campus depends.

Yours sincerely
Donnacha O Briain

Barry Doherty (private individual)

RECEIVED

07 DEC 2010

Barry Doherty
1 Marne Villas
Rathdown Road
Dublin 7
7 December 2010

Grangegorman Development Agency
St Brendan's Hospital
Rathdown Road
Dublin 7

Re: Draft Strategic Plan for the development of lands at Grangegorman, Dublin 7

Dear Sir or Madam,

I wish to make comments on the above strategic plan, which is currently open for public consultation. I received a letter from you dated 2 November 2010 which indicated that the deadline for such comments has been extended to today.

I am a member of the Rathdown Road and District Residents' Association and I have been involved in drawing up the submissions made by that organisation. On my own behalf, I endorse those submissions and this letter can be treated as if it incorporated those submissions in its text.

In addition, I wish to comment on the specific impact of the proposed development on my house.

Present situation

I live with my family on the corner of Marne Villas and Grangegorman. Our side of Marne Villas consists of terraced housing, two storeys high. Ours is the pink house shown in the picture below.



Fig. 1 – front of 1 Marne Villas (pink house to left)

Marne Villas is at right angles to Orchard View, a terrace of two-storey houses (currently empty) on Grangegorman Lower. Our house faces the side wall of 5

Orchard View. Apart from this house, the other side of Marne Villas is a boundary wall, about 7 or 8 feet high, which does not impede sunlight. The wall is illustrated on p. 4:71 of the Draft Strategic Plan



Fig. 2 – wall on south side of Marne Villas (taken from p. 4:71 of Draft Strategic Plan)

The side facade of 5 Orchard View is visible to the right of the picture



Fig. 3 – view from front garden of 1 Marne Villas showing the side of 5 Orchard View.



Fig. 4: view of corner of Marne Villas and Orchard View (taken around 1 p.m. on 6 December 2010). Note sunlight reaching facade of 1 Marne Villas (pink house on left).

Our house faces roughly south and gets good sunlight, even in winter, on the rooms facing onto the street. There is a small front garden, which also gets reasonable sunlight. In contrast, the back of the house faces north and gets virtually no direct

sunlight. There is a separate side entrance with a garden, which leads to a longer back garden. At present, sunlight reaches the back garden via the side entrance. Even in winter, there can be reasonable sunlight – see enclosed photographs.



Fig. 5: winter sunlight on garden to side of 1 Mame Villas (taken around 2 p.m. on 10 November 2010).



Fig. 6: winter sunlight on rear garden of 1 Mame Villas (taken around 2 p.m. on 10 November 2010).



Fig. 7: winter sunlight on front of 1 Mame Villas (taken around 12 p.m. on 6 December 2010). Note the shadow cast by the existing house at 5 Orchard View, which reaches the hedge but does not prevent sun entering the windows of 1 Mame Villas.

Proposed development

If the draft strategic plan is approved, there would be a complex of three- and four-storey buildings facing onto the two-storey houses in Marne Villas. These are marked as "Built Environment" in the top right of the plan on page 4:36 of the Draft Strategic Plan. The plan provides for a four-storey building on the corner of Grangegorman and Marne Villas (opposite my house). The side facing Marne Villas would be four storeys on the corner (closest to my house), dropping to three storeys further along Marne Villas.



Fig. 8: extract from p. 4:46 Draft Strategic Plan, showing proposed building heights at corner of Grangegorman and Marne Villas

Impact of the proposed development

This complex would be very bulky and loom over Marne Villas. The Draft Strategic Plan defines the location and heights of the proposed buildings but not their detailed design. It is therefore possible that the development along Marne Villas might be a single façade, perhaps with a blank wall for much of its length. This would emphasise the effect of bulk which is inherent in the proposal.

Our house, on the corner, would now be facing a four-storey building instead of a two-storey one. There would be considerably less sunlight reaching the front garden, the front rooms of the house and also the garden area to the side and rear of the house.

The submission from the Rathdown Road and District Residents' Association encloses shadow diagrams showing the effect of the proposed developments at various times on the four equinox and solstice dates (21 March, 21 June, 21 September, 21 December). As will be seen from those diagrams, our house would

be in shadow on all almost the dates chosen. At present, the house is never in shadow, even in winter when the sun is low in the sky. This would be a considerable loss of amenity. The diagrams indicate that this loss of amenity would also apply to the other houses closest to us on Marne Villas. See **annex**.

There seems no overwhelming need to have a four-storey building across from my house. It may stem from a desire to extend the roof line of the existing "clock tower" building (the former Richmond Penitentiary).

If extended, the roofline of the clock tower building would give a very high development, dwarfing the current buildings on Orchard View and Marne Villas.



Fig. 8: roofline of "clock tower" building in relation to Marne Villas (taken around 12 p.m. on 6 December 2010)

In fact, the proposed four-storey building proposed for the corner of Grangegorman and Marne Villas (facing my house) would be *higher* than the roof line of the "clock tower" building. See the artist's impression overleaf.



Fig. 9: extract from p. 4:37 of the Draft Strategic Plan, with artist's impression showing proposed building at corner of Grangegorman and Marne Villas, higher than current roof line of "clock tower" building

The photograph below has been marked with lines to show the approximate dimensions of the proposed four-storey building in relation to Marne Villas.



Fig. 10: photograph of current buildings (from fig. 8) with approximate dimensions of proposed building superimposed. Note the line extending the roofline of the current "clock tower" building.

It is inappropriate to locate such a tall building so close to a residential terrace, where it would block all light. There is ample space elsewhere on the campus for large buildings.

I would therefore request that the Draft Strategic Plan be modified so that the proposed buildings close to Marne Villas are reduced in size, or relocated, so that they do not reduce the existing levels of sunlight reaching Marne Villas.

If you wish to contact me, you can call me on 08 161 2103 or e-mail me at barrydoherty123@gmail.com.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Barry Doherty'.

Barry Doherty



ANNEX

SHADOW CAST
10.00 ON 21 MARCH, 21 SEPTEMBER



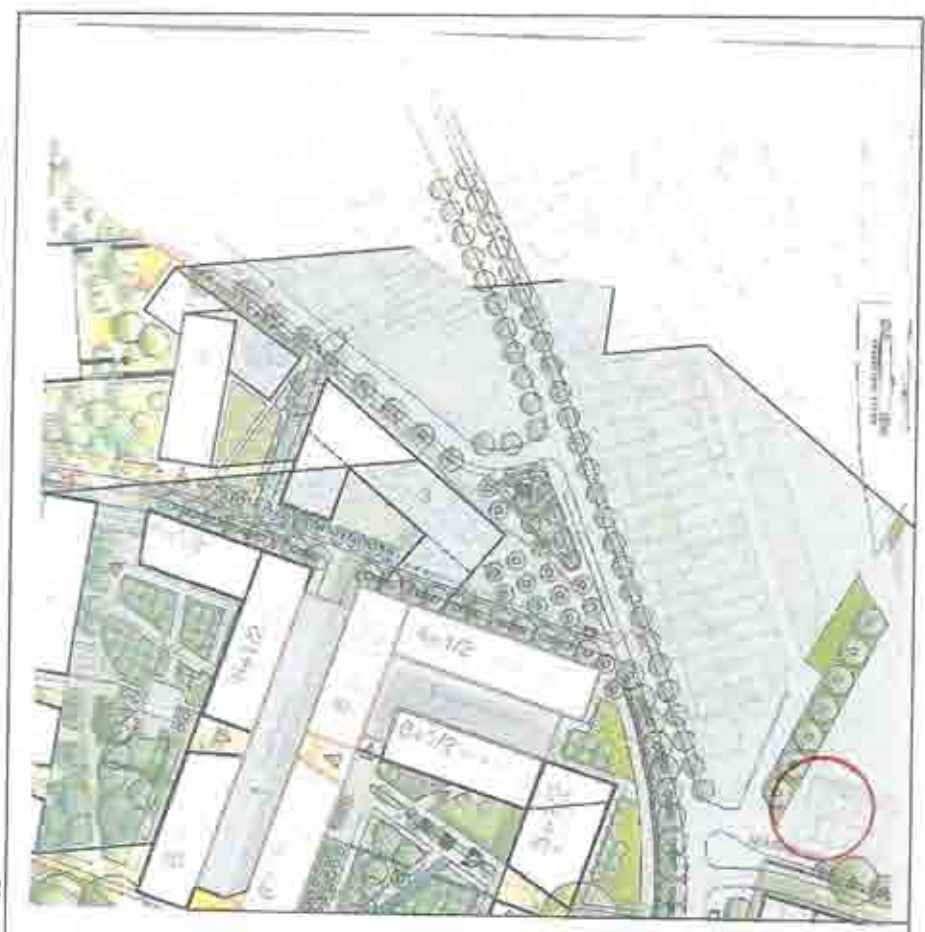
SHADOW CAST
17.00 ON 21 MARCH, 21 SEPTEMBER



NOTE: PLANS AND SHADOW CASTS ARE FOR INFORMATION ONLY AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.

OVERVIEW 2

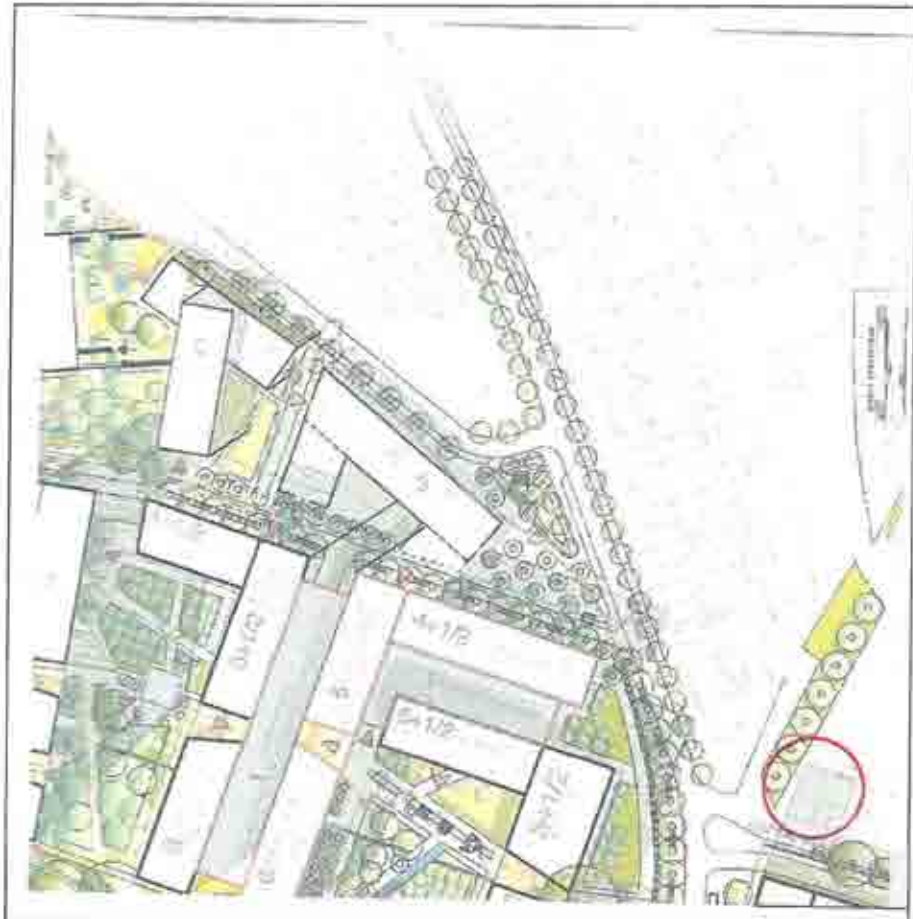
SHADOW CAST
18.00 ON 21 MARCH, 21 SEPTEMBER



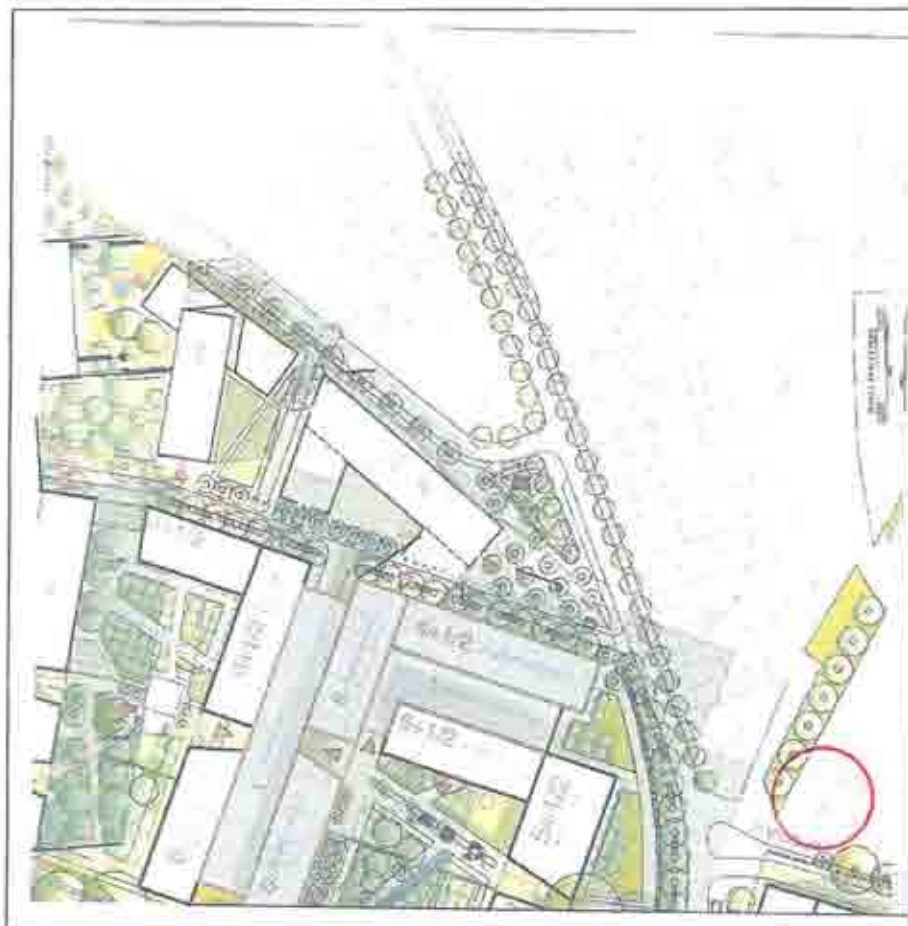
NOTE: BASED ON 3.5M FLOOR TO FLOOR ELSEWHERE IN THE PLAN, 4.5M IS SUGGESTED AS THE HEIGHT

DIAGRAM 3

SHADOW CAST
15.00 ON 21 JUNE



SHADOW CAST
17.00 ON 21 JUNE



NOTE: BASED ON 3.5M FLOOR TO FLOOR. ELSEWHERE IN THE PLAN, 4.0M IS SUGGESTED AS THE MIN

DIAGRAM 4

SHADOW CAST
12.00 ON 21 DECEMBER



SHADOW CAST
14.00 ON 21 DECEMBER



NOTE: BASED ON 33M FLOOR TO FLOOR. ELSEWHERE IN THE PLAN, 4.1M IS SUGGESTED AS THE RISE.

DIAGRAM 5

Fiona Fox (Private Individual)

Dear GGDA

Grangegorman Villas is a small row of residential houses.

The draft plan has ignored the impact that the proposed development will have on this small community.

It is proposed to place intensively occupied high rise student accommodation directly behind us, and the main car park entrance a few metres away to the front and side of us.

The car park will be in use day and night. This part of Grangegorman Lower is very narrow and can only accommodate single traffic. This huge car park being located on this narrow stretch of road will cause road congestion, noise and disruption. Our very limited parking we currently have will be targeted.

The student accommodation directly behind us will also create noise both day and night.

The plan sandwiches this small row of residential houses between student accommodation and intense use car parking. The prospect of this is intolerable. It will have a massively negative effect on the life of the occupants.

Please reconsider.

Yours Sincerely

Fionna Fox and Bernard McCabe

Raymond D'souza Parool Rajput (private individuals)

RAYMOND D'SOUZA

PAROOL RAJPUT

Architects, Planners, Interior Designers.

Grangegorman, Phibsborough, Dublin 7.

Tel: _____

Email

To

Grangegorman Development Agency

St Brendan's Hospital,

Grangegorman.

Dublin 7

6th December 2010

Ref: The Grangegorman Development Agency, Draft Strategic Plan

Dear Sir,

Please note we have previously submitted comments on the initial development proposal and we note that very few of our comments appear to have been taken on board and little has changed in the proposal since then. Following review of the GDA, Draft Strategic Plan, please find below some comments as follows most of our previous comments still stand:

There are grave concerns about the impact of the proposed Draft Strategic Plan on adjacent houses on Rathdown Road, Marne Villas, and Upper Grangegorman/Orchard Terrace. We understand that it is intended to use a Strategic Development Zone (STZ) procedure, which will determine the outline of the buildings, as they will be constructed, setting their locations, footprints and heights. Individual buildings will then be the subject of subsequent Planning Applications. Once the Applications are within the parameters set in the STZ, permission will be granted, with no recourse possible to An Bórd Pleanála. It is essential, therefore, that the concerns of the local residents are addressed now.

1. One of the objectives of the GDA strategic plan is "the development of the site in the context of the land usage in the vicinity and in a manner that is sympathetic with its urban setting". To put the surrounding areas and the site in perspective, in our opinion, primarily the urban setting within which the GDA development is proposed is generally low rise residential accommodation laid out along old rather narrow streets connecting the NCR to the centre of the city. Notably the development site is elevated and its surrounding areas gradually slope down towards the Liffey and the city centre.
 - The current proposal we believe is not sympathetic with its urban setting, the scale

of the buildings exceeding significantly the existing surrounding building fabric. In some areas along the boundary is particularly unsympathetic, overpowering and intrusive.

- It is our opinion that The site available is of a significant size to facilitate the concentration of the proposed high density buildings to be located in the centre of the site and progressively reducing the height of the buildings to the boundaries of the site with accommodation of reduced density and open spaces which are of least impact on the adjacent existing low rise buildings.

2. The proposal has most or all of the built-up area of the site located towards the north of the site. More that 80% of the proposed 60% built up ratio is located to the northern half of the site. This in our opinion makes the development unbalanced and puts greater pressure on the residential area adjacent to it, which consists of small two storey houses.

Development of this density will have a significant impact on the amenities of the small residential community there and ultimately the value of these properties.

- Please give details of economical impact analysis on the value of adjacent properties.
- Development needs to be better balanced so as to minimise the impact on a small section of the local community.

3. The Northern end of the development site is substantially higher elevation than the southern end; it is also significantly higher than the houses abutting the boundary in this area. Because of the higher elevation of the site the proposed multi-storey buildings on the GDA site will be significantly higher than the two storey residential units on the Grangegorman upper road and will be intrusive and obtrusive. They will cause over looking and over shadowing.

- There are particular concerns at the northeastern corner of the site. The buildings here are shown as 4 1/2 storeys (Academic Expansion), 5 1/2 storeys (Engineering), 6 storeys (Academic Expansion) and 6 1/2 storeys (Engineering). From approximately 20m from the boundary with Rathdown Road and Upper Grangegorman, the land falls away by some 3 to 4 metres, with the result that the floor levels of the existing houses are 3 to 4 metres below the ground on the Grangegorman site generally. Consequently, the proposed buildings at this part of the site are, in effect, 5, 6, 6 1/2 and 7 storeys high, respectively, relative to the existing 2 storey houses, and at a distance at the nearest point of only 20m. A similar situation arises at the rear of Upper Grangegorman/Orchard Terrace, where there is a four-storey building at a distance of approximately 29m from the rear wall of the terrace of houses. The land on the GDA site in this area is higher by

approximately 1.5 to 2 metres.

- Overall height of the proposed Buildings in these areas should not exceed the overall relative heights of the existing buildings, thus taking into account the difference in the ground levels. The buildings could then gradually rise to higher levels, as they get further away from the boundary.
 - Please include in Strategic Plan details of ground level survey and shadow studies of the individual areas at different times of the year such as December when the loss of light will be significant.
 - Please ensure that plantation on the boundary is kept low to avoid further overshadowing.
4. The proposal due to its greater density towards the NCR encourages greater movement of people from the NCR to the development. Currently this is the only boundary on which public transport to the site exists. The green fingers concept has most (three out of five) of the access routes directing people towards the NCR directly or via Rathdown road and Upper Grangegorman. The arrival of 22,000 students, together with approximately 2,600 teaching and ancillary staff, will have an enormous effect on the Grangegorman area, and particularly on the roads immediately adjacent to the campus.
- There will be unacceptable pressure on the residential community in this area to be faced with possibly 50-60% of the pedestrian and vehicular traffic on roads that are not designed for such use, in respect to their width of the roads in particular Grangegorman upper which in sections is barely wide enough for single way traffic and the pedestrian path is only 1000m wide.
 - Please give details of current and proposed vehicular and pedestrian traffic analysis and forecasts for these areas.
 - Please show detailed traffic management proposals for development of existing roads.
5. The proposal assumes the provision of additional public transport infrastructure on boundaries of the site, which currently the GDA do not even have ownership of or access to. Scheme is based on assumptions, such as the Luas and access to Constitution hill. If these were not to come to fruition the primary access to vehicular traffic and public transport for the site is from Grangegorman Upper and Rathdown road.
- Please give details of current and forecasted vehicular traffic and pedestrian traffic movement analysis for the different scenarios.
 - With at least two uncertainties with regards to transport provision and the history of the provision of public transport in this country it is not very reassuring to the residents of these areas. Therefore we recommend the occupation of site should

be restricted until the transport infrastructure is in place. Similar to Adams town and condition on development of the IKEA site.

6. The Environmental Report appears to have been prepared in the absence of the Mobility and Construction Management Plans and the information it would have provided, for example, about the number of truck movements per day. The Environmental Report makes reference to traffic noise on page 15 under the heading of Key Environmental Issues; "Traffic generation and the implications for noise and air quality as a result of the implementation of the Strategic Plan;" It goes on to acknowledge that "... there is potential for disturbance to neighbours during the construction and operational phases of the development" and that "the construction phase is the more significant in this regard". The Report does not quantify the implications and disturbance. The statement that "the main source of noise are building services and delivery operations within the site" fails to take into account the impact of heavy construction traffic would have on adjacent the residential amenities of the minor road which adjoin the site, i.e., Rathdown Road, Upper and Lower Grangegorman, Orchard Terrace and Marne Villas. The Environmental Report makes no effort to assess the level of construction traffic that will be necessary to implement the Draft Strategic Plan.

- o Restriction of construction traffic access to the two entrances at North Circular Road and Constitution Hill is essential for the following reasons:
 - Very high levels of heavy construction traffic can be anticipated.
 - The amenities of the residences on minor roads such as Rathdown Road, Orchard Terrace, Upper and Lower Grangegorman and Marne Villas would be protected from noise, vibration and hazard to pedestrians and motorists.
 - There are two Primary Schools in the immediate vicinity of the GDA site; significant pedestrian traffic of schoolchildren and parents occurs on these roads each weekday in the mornings and in the afternoons. Heavy construction traffic would present serious hazards to child and adult pedestrians alike.

Further listed are some continued specific concerns on the development proposed directly along the boundary wall/garden wall of the houses situated on Upper Grangegorman road.

1. Building height and density – revised proposal still appears to have 3/4 story buildings in this area. The level of site is significantly higher than adjacent properties effectively creating an additional storey to those proposed. The light in these areas will be directly affected due to overshadowing. Building heights need to be stepped down in the vicinity of

existing houses.

2. Proximity of buildings – The master plan shows the buildings very close to the boundary. There will be a significant loss of light and privacy to the rear of our houses and small gardens which are the only out door spaces since there are no front gardens and the street being too dangerous with cars driving up on the foot path as the road is too narrow for two way traffic. There will be significantly more pressure on the street with pedestrian and vehicular traffic generated by the proposed development and construction phase of Grangegorman, which further demands the need for the back gardens of these houses to be preserved in their present capacity.

- o Buildings backing on to boundary have open space on to inner side - The master plan shows a 'C' shaped building backing on to the boundary wall creating open spaces on the inside and leaving the area behind as a neglected area. This building has a serious over looking and overshadowing impact on the existing lower houses and small gardens.



- o We suggest the said building could be flipped over to create a courtyard facing the boundary thus moving the building away from the boundary wall thereby reducing the impact of overshadowing and over looking on the existing buildings as shown in the attached sketch below.



- The location of the utilities for each building needs to be clearly defined. Location of kitchens, plant rooms, open able windows etc need to be such that they are not facing on to the existing houses causing noise pollution.
3. Pedestrian path along boundary wall - The master plan shows a path along the boundary wall to the rear of proposed HSE accommodation and directly along our adjoining boundary wall/ our garden boundary wall. There will be a significant loss of privacy and security to the rear of our houses and a significant increase in noise. Also due the type of development proposed and the open access concept this path has the potential to be a continuous very busy thoroughfare for people going from the NCR to the DIT. As to current experience of back lanes with no surveillance there is potential for the area to be attractive to undesirable behaviour.
- Flipping the orientation of the 'C' shaped building as suggested above can also assist in providing passive surveillance on the access route.
 - Security on the site and adjacent areas needs to be addressed as there are a number of access points to the site which lead to quite neglected areas of the site which with out proper security can be prone to being nuisance areas and generate safety concerns to the adjacent properties.
4. Assuming 25,000 persons accessing the proposed development daily over a period of ten

hours a day and if less than 50% were to access the site off the NCR at least 1000 persons would travel to and from the direction of the NCR. If 50% were to be pedestrians there is possibility for over 500 persons an hour walking past the front door on a very narrow path. Security of houses and children is impacted along with significant additional noise and loss of privacy.

In summary to clarify the above-mentioned issues and concerns we request the GDA to consider the following

- Please give and include in strategic plan details of ground survey levels and shadow studies formally for discussion.
- Please submit details of traffic forecasts for each street.
- Please give details of economic impact statement for specific areas.
- We would insist that development adjacent to existing single storey and two storey houses along Grangegorman upper is kept to a maximum of one story with roof/attic accommodation if required to be in sympathy and keeping with the adjacent urban setting.
- We would insist that the development if any is set back a minimum of 20m from the site boundary and suitable low level native trees are planted. Planting should be carried out as soon as plans are agreed and prior to any devolvement to ensure growth of the planting is in time with the development also providing a level of screening through out the development/construction process.
- We would insist that any path if required towards the northern corner of the site is set back and separated from the boundary wall by a minimum of 10m of open space and then 10m of tree planting to minimise impact.
- An offer from the GDA of rear access to the gardens of these houses and the potential for provision of parking at the rear from the internal path would be desirable in compensation for the loss of privacy both front and back in what is currently a quite residential area, due to a substantial increase in noise, traffic, difficulties with on street parking and additional negative health and safety risk from increased volumes of traffic on the Grangegorman upper. The rear access can act as a buffer against the proposed GDA development to the back of the houses.
- Proposed buildings on the boundary should have the open space facing on to the boundary wall thus creating a safer more secure environment and also maintaining a more expectable set back between the proposed buildings and the existing houses.
- Look at Lansdowne road compensation scheme for residents.
- Construction traffic management plan needs to be considered.
- Rats need to be exterminated on site prior to the construction work.

- In the revised road usage proposals Grangegorman Upper should be designated as assess only or one-way.
- Finishes for the buildings on the site must be in sympathy with the surrounding urban area and community. There must be a standard palate of finishes for all the buildings to work from.

It is deeply disappointing that the Draft Strategic Plan, which repeatedly refers to taking the needs of the local community into account, was prepared apparently without taking into consideration that the adjacent houses are at a lower level than the GDA site generally, and that no importance was placed on the amenities of houses themselves. Either a study of the overshadowing of the existing houses was carried out, and the impact dismissed, or no such study was carried out. Either scenario is an indictment of the design process, and tends to undermine confidence in the GDA's repeated assertions of concern for its neighbours. Furthermore, the site is very large "extending to 30 hectares (73 acres)", offering the opportunity to locate taller buildings towards the centre of the site and of lowering the heights of those buildings near the perimeter in order to minimise the loss of amenity to the existing adjacent houses.

This is an initial draft of the some of the issues that are of great concern to the residents of Grangegorman Upper, my family and I. We do believe that development must happen but not at the cost of the community and the environment which we have consciously decided to be part of. We submit that a major revision of the Draft Strategic Plan is essential, prior to its submission to Dublin City Council for Planning Permission..

We look forward to meeting with you to discuss the above-mentioned issues at your earliest convenience.

Kind regards

Parool Rajput & Raymond Dsouza

■ Upper Grangegorman

And on behalf of

Christina Casey & Damien Morgan

■ Upper Grangegorman.

Colette Casey

■ Upper Grangegorman.

North West Inner City Community Health Forum

Proposal for

**Childcare & Family Support
Initiative**

to be established as part of the

**Proposal for
Childcare & Family Support
Initiative**

to be established as part of the

Grangegorman Development

**North West Inner City Community Health Forum
NWIC Network,
117 North King Street,
Dublin 7**

December 2010

The Area

The North West Inner City refers to the area from North Circular Road to the Liffey Quays and Infirmary Road to Capel Street. It encompasses the areas more commonly known as 'Stoneybatter' and 'the Markets'. The Housing Stock in the NWIC is mixed including local authority flat complexes, social housing complexes (Focus Housing), private rented and home ownership – although this is only 35% in the area compared to 73% nationally. The 2006 Census indicates that the population for this area has changed significantly in the decade up to 2006 – increasing overall by 5,800 or 22%. The NWIC also forms part of one of the 25 areas included in the RAPID initiative.

The 2006 Census also indicates a number of key issues for the NWIC:

- There is a higher than average proportion of lone parents of 44% compared to the national figure of 21%
- In some parts of the area (Inns Quay C and Arran Quay D) the rate is as high as 60%
- The unemployment rate is higher than the State as whole – ranging from 9% in some ED's to 20% in others – compared to 8.5% nationally
- Approx 16% of the population are under the age of 20years
- There is a wide variation in education levels with just under 18% of the population with either no formal education or primary education only
- The area contains a range of 'special needs' accommodation – for people who are homeless or who are in the care of HSE Mental Health Services
- Social housing accounts for over 20% of housing stock, compared to the national rate of 12%
- In some areas where there are local authority flats the rates are over 30%
- Private rented housing accounts for 31% - significantly higher than for the State as whole where the figure is 10%
- Seven of the ten ED's in the area are below the national average as regards disadvantage - three of which are significantly below the average and one (Inns Quay C) classified as 'very disadvantaged'
- There is a more diverse population in terms of nationality than the state as a whole

Developments in Early Childhood Services in the NWIC

Over the last number of years there have been significant developments in Early Childhood Services and a range of facilities have been developed. They have been developed in response to identified need by people living and working in the area and mainly using a community development approach. They have been primarily based on the needs of children and promote the benefits of early childhood services particularly in a disadvantaged area such as the NWIC – which have been well researched and show how Early Childhood Services can:-

- Promote the social and educational development of children, particularly in areas of disadvantage, thus giving them an equal early start in life
- Alleviate family stress and social isolation
- Facilitate parents to return to education, training and employment

In addition a number of 'Children & Family' Projects have also been developed which focus on the needs of primary school aged children - (Aosog Children & Family Project, Stoneybatter area and Step By Step Project, Markets area). The benefits of these initiatives – particularly for vulnerable families – have been exceptional and are now an established aspect of Family Support in the NWIC.

The Policy Context

All the above mentioned services in the NWIC have been developed and are governed by various legislative provisions including:-

- The Child Care Act 1991
- The Children's Act 2001
- The Domestic Violence Act 1996
- The Education (Welfare) Act 2000

In addition this work occurs within the overall context of a wide range of key strategies, policies, guidelines and frameworks – primarily the Children First National Guidelines for the Protection and Welfare of Children (1999), The National Children's Strategy (2000), The Agenda for Children's Service: A Policy Handbook (2007) and Primary Care – A New Direction (2001)

The Proposal

The proposal is to develop a new service for children 0 – 15 years and their families in the NWIC on-site as part of the Grangegorman Development, which can incorporate both Early Childhood and Family Support Initiatives modelled on the above mentioned services.

The Rationale

The need for such a service has been continually identified over a number of years by people living and working in the area:-

1. A research project carried out in the NWIC on behalf of the HSE *“Day-care provision for children 0 – 5yrs in the NWIC” (2001).*
2. NWIC Network Area Action Plan 2006 – 2010
3. NWIC Health Forum – *Health Needs Assessment 2009*

In particular more recently whilst carrying out the Health Needs Assessment, the need for adequate childcare provision through day centres, nurseries, crèches and playgroups were identified yet again. It was suggested that the range of childcare services in the NWIC needs to be broadened and expanded through the provision of greater support for existing providers and the development of full day-care services which would enable parents to access full-time jobs, training programmes and educational courses. In addition the expansion of childcare services was also seen, as a vital mechanism for providing much needed family support for the general area.

In relation to the formal education system, there is a higher than average number of young people from this area who leave school without any formal education. . As a result many people from the area have ‘lost out’ on formal education. Statistics from the 2006 Census would suggest that the levels of educational attainment in the NWIC are less than the average for the rest of Dublin. Therefore, the provision of a Children & Family Initiative, with a clear focus on family support and educational and social supports for vulnerable families is a key strategy to tackling poverty and disadvantage in the NWIC.

Benefits of such a service

The development of such an initiative in the NWIC could

- Promote and practice an integrated response to child poverty and disadvantage in the NWIC
- Provide a range of Family Support services for some of the most vulnerable families in the NWIC
- Operate an open, transparent and flexible resource for the local community in the NWIC
- Guaranteed access to affordable childcare 'on site' for local students
- Provide accredited Childcare/Social Care training for local people interested in pursuing a career in childcare
- Provide a range of afterschools activities – promoting educational and social programmes and thus supporting children to attend and remain in the educational system
- Work in conjunction with local educational providers to eliminate early school leaving
- Ongoing collaboration with DIT Childcare Training College and local providers to guarantee local access to expertise, advice and information
- Provision of part-time courses in Childcare/Social Care – particularly for local childcare providers
- Close collaboration with local childcare providers – particularly for 'College Placements' for trainee Childcare/Social Care students
- Provision of workshops/seminars for Childcare Workers to up-date skills & expertise



Fidelma Bonass, Senior Practitioner, Community Development Worker, HSE

Response from North West Inner City Community Health Forum

Response from North West Inner City Health Forum

The North West inner City Health forum is a group comprising of representatives from HSE and local community groups. It was established in 2006 and aims to develop a collaborative local health strategy between community groups and the HSE to ensure effective community participation in developing a range of primary and community health care facilities for the North West inner City area, in particular those planned on the Grangegorman site.

The Forum notes and welcomes the planned services for a range of care groups, including replacement mental health facilities, a health and social care network centre, older persons, disabilities, addiction, children and families. The forum strongly advocates for these basic services, acknowledging the lack of services in the area and poor infrastructure for existing services overall. The forum refers to the publication of the *“Grangegorman Neighbourhood and Primary Care Area: Health Needs Assessment”* (2010), which details many of the health and social needs of the local community, and asks that it provide a blueprint for the development of such services in the future.

The forum notes and welcomes the inclusion of a range of sports, leisure and recreational facilities, and asks that cognisance is given to local groups and clubs who should be allowed access such state of the art facilities in the area.

The North West Inner City area has in sufficient facilities for children, including childcare day spaces and play areas. The Forum would like to see designated play areas on the campus for local children and their families to use. We note that on Page 39 of the strategic plan, specific mention is given to crèche facilities for DIT staff and students. The provision of accessible, affordable childcare is a necessity in the local community must be considered. The *“Grangegorman Neighbourhood and Primary Care Area: Health Needs Assessment”* (2010) highlights the need for a child and family support service in the area. The planned redevelopment provides an ideal opportunity for such a centre.

Fidelma – do you want to insert your piece here?

The forum welcomes the suggestion of a public library on the campus, which is open and accessible to all in the community.

Glenbeigh Area Residents Association



*The Glenbeigh Area Residents Association - Cumann Áitritheoirí Cheantair Ghleann Beithe
c/o 11 Glenbeigh Road, Dublin 7
Email: paulinegildea@eircom.net
Tel: 087 9406122*

Re.: Grangegorman Development Agency: Masterplan – Observations of Glenbeigh Area Residents' Association

The Glenbeigh Area Residents' Association welcomes the announcement and publication of the Strategic Masterplan for the development of the grounds of St. Brendan's Hospital for Educational and Health uses and the consolidation of all DIT campus buildings on this site. We envisage that this plan will greatly enhance the area and will provide a much needed development anchor for the social and economic uplift for the North West Inner City of Dublin.

The Residents' Association represents a community of 185 homes located off the Old Cabra Road. The area, while outside the planning area of the Strategic Plan, is directly adjacent to the Cabra East C Neighbourhood Area of the plan, and borders the Phoenix Park railway line. In view of the close proximity of the Glenbeigh Area to the site and its Neighbourhood Areas, it is felt the Glenbeigh Area Residents' Association should be included in the list of local community groups to be consulted into the future.

The Residents' Association has reviewed the Masterplan and would like to make the following comments and observations:

1. Construction Phase

Noise, Dirt and Site Management: The Association would like to express its concern about the potential disruption and public inconvenience caused by large scale development works on the site and adjoining areas. It would suggest that a management plan is put in place in order to minimise the impact of construction noise, dirt and potential disruption to water, electricity, gas and other public utilities during the construction phase.

Traffic Management: The Association would like to express its concern about the potential impact of large plant machinery to local traffic flow and would suggest that a site traffic management plan is established during the construction phase.

Local Employment: The Association would welcome and envisage that the Grangegorman Development Agency could put in place a local employment plan for the construction phase of the project and consult with relevant agencies in the area (FAS, Social Welfare) with a view to identifying matching skills and employment status of those living in the catchment area, as a priority. The Association would like to propose that a percentage local employment allocation be included in all tender specification documents, subject to approval by the relevant state agencies.

Sustainable Reuse of Existing Building Materials: The Association would envisage and support the development of a resource efficient construction phase, making sure that any materials that can be reused from existing buildings on site are used in newly constructed buildings. It recommends that a plan for the sustainable reuse of existing building materials is put in place.

2. Design

Building Height and Lighting: The Association would like to express its concern about the potential impact of new large scale buildings on the adjacent neighbourhoods. It recommends the use of Shadow Cast Analysis during the planning phase to ensure the public are made fully aware of the impact of new buildings on houses, public open spaces and adjacent buildings on the site. Final building design should maximise light and reduce overshadowing. The Association would like to express its concern about the potential impact of lighting, including night lighting of sports pitches, on the general amenity of the area.

Accessibility and Permeability: The Association would envisage that the site is laid out so as to maximise its connectivity with the local community and neighbouring areas. In this regard, The Association would like to propose that the agency survey existing movement (*desire lines*) and access points between the site and Stoneybatter/North Circular Road/Broadstone. It should also ensure that the site has a fully integrated network of cycle and footpaths.

Open Space: The Association envisages that any landscaping proposals for the provision of 20% Open Space for residential elements of the plan will include adequate and safe sit out spaces for the elderly and young families. The Association envisages that any public Open Space provision will contain the necessary play spaces and equipment for children, teenagers and adults (of all ages).

Primary School: Many of the local children from the Glenbeigh Area are pupils of the Dublin 7 Educate Together School currently sited on the Grangegorman grounds (beside the Grange Pub). The Association notes the plan positions the school directly adjacent to the social and supported housing blocks of the HSE/St. Brendan's. ("HSE Support Space" and "HSE Supported Housing" and "HSE Health Care & Supported Housing" - Ch: 5 Implementation: Diagram 5.3d – Packages and Buildings Layout).

It also notes that the school is sited at some distance from green areas in the plan.

The Association suggests the GDA should consult with the Board of Management of the School prior to any finalisation of plans for the relocation of the school to a new build on the site. The school should also be consulted with regard to allocation of sufficient land adjacent to it to make provision for a school market garden.

3. Community Gain/Social Infrastructure

Social Infrastructure & Facilities: The Association notes that the Masterplan makes reference to “Social Infrastructure Projects”, in particular 25 social housing units, a Primary School and a local public library. The Association would also support other community gain elements to be included in the plan, for example:

- A campus Community/ Further/Adult Education Centre for early school leavers (given that the Fas Training Centre in Cabra will cease to operate from 24th December, 2010).
- A campus Community IT centre, to provide for full IT hardware/software for the local community and small businesses.
- A campus Enterprise Hub for local business start-ups and entrepreneurs.
- A campus based Sports centre with swimming pool with privileged access for the local community and residents.
- A Civic Centre, with meeting rooms, hall and crèche facilities for the community (in addition to any proposed facilities for students or staff i.e. staff crèche on site)
- Social housing above the 25 units specified, to cater for young single family units, particularly students.
- A Community Growing area designated within the green zones of the plan.
- A Community Park with seating and play areas designed for the elderly, young children and teenagers. In addition, the Community Park should be landscaped to enhance local biodiversity.

4. Transport and Mobility

Mobility Management Plan: The Association notes that an MMP is to be devised for the site and that parking provision will be catered for by means of underground parking. In view of the proximity of the site to the Glenbeigh neighbourhood, residents have expressed particular concern about the potential impact of increased traffic and congestion in the locality. Residents

have also expressed concern about increased pressure for parking on roads adjacent to the GDA site. While there is emphasis on reduction in the use of the car for access to the site, it is necessary to make adequate provision for parking to ease pressure on adjoining roads. The Association would suggest that a traffic impact assessment is conducted for all phases of the plan and that adequate car and sheltered cycle parking is provided on site.

The Association welcomes the decision to advance the plans for the consolidation of the DIT on the Grangegorman site and to make provision for modern day facilities for the patients and staff of St. Brendan's Hospital. The above observations have been made in order to assist the GDA in advancing the plan and improving it for the benefit of all users.

We look forward to receiving a response to our observations and proposals, and to being fully consulted on any changes to the Masterplan or proposals at planning stage in the future.

Prepared by Deirdre Joyce on behalf of The Glenbeigh Area Residents' Association.

7th December, 2010

Chairperson: Dave Little; Caragh Road; Secretary: Pauline Gildea; Glenbeigh Road; Treasurer: Declan Moore; Glenbeigh Road. Committee Members: Margaret Conroy; Jim Fenton; Deirdre Joyce; Margaret McGarry; Tommy Murray; Sean Scanlon.

Railway Procurement Agency

38

Grangegorman Development Agency,
St. Brendan's Hospital,
Former Nurses Education Centre,
Grangegorman,
Dublin 7



Railway Procurement Agency

Perkgate Business Centre,
Perkgate Street,
Dublin 6, Ireland.

Phone: +353 (0) 1 406 3400
Fax: +353 (0) 1 406 3400
www.rpa.ie

Seán Ó Súilleabháin

are 11/11/10

11/11/10 11:11 AM
Grangegorman Development Agency,
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Phone: +353 (0) 1 406 3400
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www.rpa.ie

RECEIVED
08 DEC 2010
by Post + Email

7th December 2010

Re: Grangegorman Development Agency Draft Strategy Plan

Dear Sir,

RPA welcomes the opportunity to comment on the Draft Strategy Plan for Grangegorman Lands. We appreciate being a part of the consultation process and hope to make a positive contribution to the final strategy document. Following our review of the draft strategy we have the following comments:

RPA commend the agency for designing the campus to promote and encourage the use of sustainable transport among other aims. In particular, we welcome the full integration of the nearby Luas Broombridge stops (proposed Broadstone-DIT stop and the possible future Grangegorman stop) as main pedestrian access points to the campus. We also welcome the consideration of access to the site from various stops on the existing Luas Red Line.

The opening of the possible future Grangegorman stop is dependent on the further development of Grangegorman and Broadstone lands. Delivery Aim 4 of the plan is "to move a minimum of 50% of the DIT student body into the new campus in a single first relocation from existing DIT accommodations...". RPA propose to continue consultation with GDA with regard to the timing of future stop opening.



transport21
progress in motion

LUAS

METRO

Integrated
Ticketing
System

In the movement and transport section the Luas Broombridge stops close to the campus are identified as Broadstone South and Broadstone North. Please note that these stops should be named Broadstone-DIT and Grangegorman respectively.

We hope you find these comments useful and look forward to our continuing participation in the process. If you have any further questions/comments please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "David King". The signature is written in a cursive style with a long, sweeping underline.

David King

Transport Planning Manager RPA

CC. Jim Kilfeather Project Manager Luas Broombridge

James and Evelyn Hannon and Mary Pope (Private Individuals)

RECEIVED

07 DEC 2010

6th December, 2010

Grangegorman Development Agency,
St. Brendan's Hospital
Grangegorman,
Dublin 7.

Re: DRAFT STRATEGIC PLAN ETC. RE LANDS AT GRANGEGORMAN

We wish to make the following observations:

1. All reference to **North Circular Road** houses indicate they are **three to four floors**. Our homes are two of six **two storey** semi detached houses which face the entrance to HSE Conolly Norman House/St. Dymphna's. We are concerned about some of the **excessive heights** proposed within the plan.
2. **Bradoogue River**: Flooding where Rathdown Road joins Grangegorman Upper is often evident to different degrees. Similar effects are also evident where Annamoe Terrace joins New Cabra Road – also in the path of the river which “.....once ran through site of Grangegorman but has been culverted for public drainage with a branch running down the Grangegorman Road and a second branch running through the hospital”. With so many hard surfaces introduced to the area in recent times, plus what is proposed, flooding is major concern.
3. **Population**: Circumstances have greatly altered over the years on this road. Many houses were converted to hostels and institutions (including Simon, Rehabilitation of Women Prisoners etc.). Very many different types of supported accommodation, high support and sheltered accommodation have been added including Health Board / now HSE administered institutions. In addition, flats and bedsits became a feature of many of the large houses on the North Circular Road. Unfortunately many families, long time owner/ residents, moved away.

During the last decade, the region became multicultural during the building boom, with a very transitory population. Ref. Environmental Report -Age Profile – Population Trends – tables 6.2 and 6.3. **Table 6.4 indicates GDA area with 55.9 % Irish whereas Dublin had 82.8 % and the State 85.8% - year 2006.** So many units in the region are not appropriate for family living and the proposal to build student accommodation may create oversupply. The supply of more family friendly units would help to create a more stable and balanced community.

4. The site zoned under **Dublin City Development Plan, 2005/2011 as Z 12,** this zoning requires that minimum of 20% of site be retained as accessible public

open space incorporating landscape features and retaining the essential open character of the site.

Possible changes to the air quality, reduction of the "green lung", potential increase to the already high noise levels, the vibrations and the effect on our properties during building work plus dust and dirt associated with any construction are our concerns. We trust the development will become a major improvement to the region.

5. With a bus serving the Phoenix Park/ Zoo etc. via North Circular Road, we trust **Tourism** will become a feature of the development. Additional spending power in this new centre, the use of restaurants, shops and other facilities, together with the **Museum featuring the Archaeology and Local Heritage** should help local employment. The region surrounding Grangegorman is steeped in history.

We have already contributed to the consultations to date and we appreciated the opportunity to do so. We would welcome meeting with the Grangegorman Development Agency prior to the commencement of the HSE building within the complex for reassurance and we thank you in anticipation.

St. James,
[redacted] North Circular Road,
Dublin 7.

James Hannon, Evelyn Hannon (PP)

James and Evelyn Hannon

Ardrum,
[redacted] North Circular Road,
Dublin 7.

Mary E. Pope

Mary E. Pope

John and Maria Dunne

RECEIVED

17 DEC 2010

■ Rathdown Road
Phibsborough
Dublin 7

7th December, 2010

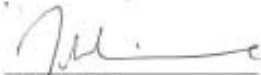
Submission on Grangegorman Development Agency Draft Strategic Plan

We, John and Maria Dunne, are homeowners resident at the above address. We understand that our property will be adversely affected by the proposed development of the Grangegorman site, in that parts of it will be deprived of natural light and sunshine at certain times of each day in winter, due to the shadow cast by certain buildings in the proposed development.

The impact of that shadow-fall on our rear garden and on our home is illustrated in the submission made by the Rathdown Road and District Residents' Association submission – see especially diagrams 2, 3 and 5 of their submission.

We are also concerned about the impact that the proposed plan will have during the construction phase and later, when the site is a fully functional educational facility, on what is designated a Residential Conservation area by increased traffic flow and the influx of thousands of students to the campus.

We are not opposed to the ordered development of the site but wish to state as individual home owners who are resident on Rathdown Road that we support the submission made by the Rathdown Road and District Residents' Association. We suggest that the Draft Strategic Plan for the Grangegorman site be amended in line with those proposals made by the Association in their submission.


John Dunne
Maria Dunne

Helen Doyle

RECEIVED

07 DEC 2010

■ Rathdown Road
Phibsborough
Dublin 7

7th December, 2010

Submission on Grangegorman Development Agency Draft Strategic Plan

I, Helen Doyle, am a homeowner resident at the above address. I understand that my property will be adversely affected by the proposed development of the Grangegorman site, in that parts of it will be deprived of natural light and sunshine at certain times of each day in winter, due to the shadow cast by certain buildings in the proposed development.

The impact of that shadow-fall on my rear garden and on my home is illustrated in the submission made by the Rathdown Road and District Residents' Association submission – see especially diagrams 2, 3 and 5 of their submission.

I am also concerned about the impact that the proposed plan will have during the construction phase and later, when the site is a fully functional educational facility, on what is designated a Residential Conservation area by increased traffic flow and the influx of thousands of students to the campus.

I am not opposed to the ordered development of the site but wish to state as an individual home owner who is resident on Rathdown Road that I support the submission made by the Rathdown Road and District Residents' Association. I suggest that the Draft Strategic Plan for the Grangegorman site be amended in line with those proposals made by the Association in their submission.


Helen Doyle

Brian and Rita O'Hagan

RECEIVED

07 DEC 2010

■ Rathdown Road
Phibsborough
Dublin 7

7th December, 2010

Submission on Grangegorman Development Agency Draft Strategic Plan

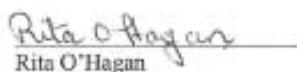
We, Brian and Rita O'Hagan, are homeowners resident at the above address. We understand that our property will be adversely affected by the proposed development of the Grangegorman site, in that parts of it will be deprived of natural light and sunshine at certain times of each day in winter, due to the shadow cast by certain buildings in the proposed development.

The impact of that shadow-fall on our rear garden and on our home is illustrated in the submission made by the Rathdown Road and District Residents' Association submission – see especially diagrams 2, 3 and 5 of their submission.

We are also concerned about the impact that the proposed plan will have during the construction phase and later, when the site is a fully functional educational facility, on what is designated a Residential Conservation area by increased traffic flow and the influx of thousands of students to the campus.

We are not opposed to the ordered development of the site but wish to state as individual home owners who are resident on Rathdown Road that we support the submission made by the Rathdown Road and District Residents' Association. We suggest that the Draft Strategic Plan for the Grangegorman site be amended in line with those proposals made by the Association in their submission.


Brian O'Hagan


Rita O'Hagan

Owen Feeney

Dear Ronan,

Thank you for your e-mail. Please see my observations on the plan below.

Kind regards,

Owen

Observations on the draft Strategic Plan for the redevelopment of the Grangegorman site

- The redevelopment of the Grangegorman site has the potential to greatly enhance the neighbourhood.
- However, the redevelopment must ensure that the neighbourhood remains an attractive community for existing residents.
- The over-concentration of multi-storey, student residential accommodation next to existing low-rise homes should be avoided.
- Short-term, rented accommodation for students and summer visitors should not include balconies or windows over-looking existing homes and gardens.
- A plan for the phased integration of large numbers of students to the neighbourhood should be put in place.
- Existing residents should have access to new facilities, including parks and sports facilities.

Navan Road Community Council

NAVAN ROAD COMMUNITY COUNCIL

7th December, 2010

Re: Proposed development at Grangegorman.

Dear Sir/Madam,

We are an umbrella organisation, representing residents associations throughout the area, on both sides of Navan Road, from Ashtown to Skreen Road. Due to illness of both our Chairwoman and Secretary over past 2 weeks, we are submitting a shortened version of what we had hoped to send you on this important matter. We attended at most meetings on this matter over past 2 years.

Traffic

Our route into the City transcends the surrounds of the proposed development, as in fact does the route of all residents from outer Dublin 15, which directly meets our area at Ashtown. We are concerned that the extra traffic generated from the proposed development will slow or hinder our direct access to the City. It may also undo the benefits to be expected from the Quality Bus Corridor for Navan Road, currently in pre-planning stages of discussion.

Arrangements be put in place to ensure that parking throughout the surrounding roads will not become a problem/encroachment to the local residents.

Open Space/Trees

The existing open green areas be maintained, especially to offset any extra density of building, and all mature trees be listed and protected. Some space be allocated for allotments, to encourage students and locals to grow food for use in the college canteens, and for sale to locals, at say, week-end markets. All leaf fall be gathered to create compost for such use, and sale on to locals.

Sporting facilities

All sporting facilities be open to the public, and particularly for young people in the immediate surrounds, who should be encouraged to use it. Local primary/secondary schools be encouraged to use them, to encourage involvement and discourage anti-social behaviour.

Library facilities

Special areas be created within the Library facilities for use by the public, particularly young people in the immediate surrounds, and local primary/secondary schools be kept informed of this, and their students encouraged to participate - so that they will be guided towards future enrollment in the Educational development itself.

Heights & densities

Buildings are too high (up to 15 stories) within an historical area of 2/3 stories - such extreme heights will overwhelm protected buildings within the compound. Of particular concern are the towers proposed. These towers are located on an escarpment, and will dominate the skyline of the historic North Inner City. They will forever dominate the setting of Kings Inns - by far the most important protected structure in this area. Their height should be limited to no more than 32m.

Historic Area

The proposed development is close to Henrietta Street, Bolton Street College, Fruit & Vegetable Market building, Four Courts and Incorporated Law Society of Ireland, leading directly on to National Museum Collins Barracks and Heuston Station. These important buildings should provide a guideline to encourage sensitive and intelligent development, and retain the importance of this catchment area within the historic North Inner City.

Yours faithfully,

Pat Allison (Ms.) Public relations officer,
Navan Road Community Council,
4 Martin Savage Park,
Ashtown,
D. 15.

Ph. 8383330 087 2175334

National Transport Authority



Floor 3, Block 6/7, Irish Life Centre
Lower Abbey Street, Dublin 1

Ullár 3, Bloc 6/7, Ionad Irish Life, Sráid na
Meiriceánach, Baile Átha Cliath 1

tel: 01 879 8300

fax: 01 879 8333

email: info@nationaltransport.ie

web: www.nationaltransport.ie

Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7.

7th December 2010

Re. Grangegorman Draft Strategic Plan 2010

Dear Sir/Madam,

The NTA strongly supports the development of the Grangegorman site, as proposed in the Grangegorman Strategic Plan, on the basis of the following high level policy objectives implicit in the National Transport Authority's Draft Transport Strategy:

- It facilitates the consolidation of future population and employment growth into the Metropolitan Area,
- It complements existing and proposed investments in public transport,
- It allows for the achievement of development intensification within an Inner City location and within the local walking catchment of the proposed Broombridge Luas stops of Broadstone DIT and Grangegorman,
- It demonstrates a high quality of urban design, and
- It presents an opportunity to deliver a high quality public domain within the Plan area and associated with this:
 - higher levels of permeability within the Strategic Plan area and good connections to the surrounding area, and
 - the potential to achieve a high mode share for cycling and walking.

It is recommended that a wider Transport Impact Assessment¹ is undertaken prior to any significant new development taking place. This will need to deal with the impact of developments proposed in the Strategic Plan area and will need to address a broad range of transport issues. This would include car parking provision and management and the external pedestrian environment. This would support the implementation of the Strategic Plan's *project vision* and *movement objectives*.

The NTA will support the Grangegorman Development Agency in the production of the Transport Impact Assessment.

¹ If the site were designated as a Strategic Development Zone, a Transport Impact Assessment would need to be prepared.

Car Parking Provision

The NTA favours limited car parking provision due to the high level of accessibility by walking, cycling and public transport and the need to minimise discretionary car-based trips. The NTA recommends that the proposed level of car parking be informed by a Transport Impact Assessment relating to the Strategic Plan area and its environs. This should address the following:

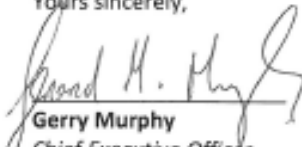
- Phasing and quantum of car parking, related to the phasing of development across the Strategic Plan area;
- Design for a flexibility in the location and quantum of car parking facilities that allows for a possible reduction of car parking over time;
- Management of car parking in the campus;
- Requirements for mobility impaired and operational car parking;
- Maximising accessibility to public transport services; and
- Maximising accessibility by walking and cycling within and in the environs of the Strategic Plan area.

Pedestrian environment

The NTA supports the walking objectives in the Strategic Plan. However, it is necessary that this is complemented by a high quality pedestrian environment in the vicinity of the Strategic Plan area, taking into account the anticipated increase in the level of pedestrian activity and the need to encourage the use of this mode. The Transport Impact Assessment should, therefore, focus on measures to improve the level of service for pedestrians around:

- local bus stops serving the Strategic Plan area;
- proposed Luas stops;
- pedestrian access points and access routes from local road network;
- all junctions in the vicinity of the Strategic Plan area.

Yours sincerely,



Gerry Murphy
Chief Executive Officer

Emer Reynolds

To: GDA

Date: 7th December 2010

Dear Sir/Madam

Grangegorman Villas is a small row of residential houses.

The draft plan has ignored the impact that the proposed development will have on this small community.

It is proposed to place intensively occupied high rise student accommodation directly behind us, and the main car park entrance a few metres from the end of our terrace.

The car park will be in use day and night. This part of Grangegorman Lower is very narrow and can only accommodate single traffic. This huge car park being located on this narrow stretch of road will cause road congestion, noise and disruption. It is our concern that the very limited parking we currently have will be targeted.

The student accommodation directly behind us will also create noise both day and night. We have put our not insignificant concerns on this matter on the record many times.

The plan sandwiches this small row of residential houses between student accommodation and intense use car parking. As stakeholders, we find the prospect of this intolerable. The proposed plans by the GDA will have a massively negative effect on the lives of the occupants of Grangegorman Villas.

Please reconsider.

Yours Sincerely

Emer Reynolds
Tony Cranstoun

Kevin Duff, Irish National Trust

Mr. Ronan Doyle
Grangegorman Development Agency
St. Brendan's Hospital
Grangegorman
Dublin 7

Re: Draft Strategic Plan for lands at Grangegorman, Dublin 7

Dear Mr. Doyle,

Thank you for referral of the Draft Strategic Plan offering opportunity for comment. We wish to comment as follows.

Impact on historic designed landscape

The methodology used for the planning of the new buildings at the Grangegorman lands fails to recognise the importance of the site as one of the city's ancient open spaces and one of its most important urban designed landscapes comparable to the St Stephen's Green, Phoenix Park and Dublin Castle complexes. Before deciding on the location, layout, scale and form of new blocks, a full appraisal of the evolution of the designed landscape should take place and the important features identified and carefully incorporated in the planned design. An Taisce is concerned that the current proposal has not sufficiently researched the evolution of the site and the importance of the surviving structures standing on the site.

The lands which are the subject of the Draft Strategic Plan are the only remaining unbuilt-upon part of the roughly triangular Oxmantown Green which was given to the citizens of Dublin by the medieval royal charters of the city, as well as St Stephen's Green on the south side. It was used for grazing, for the drilling of the militia and the harvesting of timber. It was from here that the army of the Duke of Ormonde went to battle in the wars of the confederacy and also the forces of King James before the battle of the Boyne. Like at St Stephen's Green, the Corporation laid out lots for building around the edges in the late 17th century. The Royal Barracks - now the National Museum - was built on its south-west river front and the Blue Coat Hospital - now the Incorporated Law Society – on its south-east corner in the 18th century. Near its northern apex on the Grangegorman Demesne, the House of Industry was established by 1770 when the Surveyor General Francis Johnston built the extant structure. Subsequent Surveyor Generals continued to build impressive buildings and influence the layout of the site. The Grangegorman lands are therefore of national and international heritage importance as a complex of buildings set in a designed landscape. Future development should respect, restore and enhance this remarkable heritage whilst providing for its regeneration.

It is recommended that a full appraisal study of the evolution of the historic designed landscape needs to be carried out.

Impact on Protected Structures and historic buildings

As currently provided for in the Draft Strategic Plan, the character and special interest of Protected Structures within the Grangegorman lands would be seriously damaged and undermined by the scale, bulk, layout and proximity of new development. There are many historic buildings and groups of buildings of significant architectural and cultural value on the lands which are Protected Structures. This affords a considerable degree of protection to their 'character and special interest', including their setting. Under the Draft Plan, new development blocks would inappropriately dominate and overwhelm Protected Structures, undermining their relationship to each other and to their surrounds. This would be contrary to the provisions of the Architectural Heritage Guidelines for Planning Authorities 2005 (sections 13.5 to 13.7) and the Dublin City Development Plan 2005-11 (section 10.1.4), and would be contrary to best international conservation practice for development in historic settings.

The Grangegorman complex is composed of modestly-scaled institutional buildings of the 18th to 20th centuries set in the historic landscape. The physical and visual impact of siting numerous large blocks close to and beside what are mainly one- to three-storied groups of historic buildings has not been adequately assessed in the Draft Strategic Plan. The character of Protected Structures and other features of the historic lands need to be taken as the starting point for its development. The shoehorning of modern blocks close to and up tight against Protected Structures as proposed in several instances does not protect their character, special interest or setting including views and prospects.

For example, the siting of a block running between the Church of Ireland chapel and the group of historic buildings to the north - the Male Infirmary, Female Infirmary and Roman Catholic Church - would intrusively and inappropriately impact on the setting of this group of Protected Structures and would be contrary to section 13.7.2 (c) of the Architectural Heritage Guidelines which requires consideration as to whether "a new building erected between a structure and a feature within the attendant grounds [eg. another historic building] will alter the character of both", and wherein the significance of historic settings generally and the need for careful scrutiny of development proposals, is outlined. Likewise, the Male Ward building is inappropriately hemmed in on all sides, failing to retain any sense of its setting and amenity.

It is recommended that significant revision to the Draft Strategic Plan is required in respect of the setting of all historic buildings within the lands. Mitigation of significant adverse impacts of blocks on Protected Structures, in terms of their scale and proximity, is needed.

Clock Tower building

This building is clearly of significance not just for its classical limestone and granite elevation onto the street but as a central identifying landmark or pivot within the Grangegorman lands (as evidenced in the use of its cupola as the GDA's logo). However, under the Draft Plan, the building would be emasculated by excessively large and bulky blocks adjoining immediately to the north and south. This would fail to retain an appropriate setting for the building and would therefore be seriously at variance with the policies contained in the Dublin City Development Plan 2005-11 as they relate to development within the curtilage and setting of Protected Structures (section 17.10.2) and the provisions of the Architectural Heritage Guidelines for Planning Authorities 2005. The aim should be to maintain the primacy and landmark presence of this building as currently exists.

Former Nurses' Home

The Draft Strategic Plan provides for demolition of the 1930s former Nurses' Home to the south alongside the Clock Tower building. This is a perfectly good building of its period which can be upgraded to meet modern energy requirements. Its neo-Georgian style in wine-coloured brick perfectly complements the adjoining limestone Clock Tower building. Buildings from this period are increasingly rare and represent a valuable layer of the city's architectural heritage. They were also robustly constructed and are readily adaptable for various uses. The environmental concerns in relation to demolition of existing buildings are acknowledged in the Draft Dublin City Development Plan 2011-17. Section 16.1.11 of the plan states: "To minimise the waste of embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new-build". It is recommended that the Draft Strategic Plan is revised to provide for retention, rehabilitation and incorporation of this building.

Former Richmond Lunatic Asylum

The monumental early-19th century elevation of the former Richmond Lunatic Asylum (Protected Structure) is an important example of the work of architect Francis Johnson (see attached entry from 1995 Dublin Civic Trust buildings at risk list, 'Wasting Assets'). It is the only part of a massive quadrangular complex to remain, the other ranges having been demolished in the 1980s. Despite this, the open space to the front of the building has had the fortune to survive to date, and is a designated Conservation Area in view of its importance to the Johnson building. It is not appropriate to build on this space as the Draft Strategic Plan proposes. The existing green space is a formal setting for the classical building and should be maintained free of development. This is in line with best international practice for development in historic settings and the protected status of the building. We recommend that the Plan is revised in this regard.

Impact on residential amenity of areas adjoining the site

There is extensive existing residential development adjoining the site, primarily on Grangegorman Upper and North Circular Road. These areas are zoned Z1 (To protect, provide and improve residential amenities" and Z2 ("To protect and/or improve the amenities of residential conservation areas"). The scale and layout of blocks on the Grangegorman lands must carefully integrate with these residential areas and ensure their amenities are protected as per the site zoning. It should prevent against overlooking, overshadowing and visual obtrusiveness and be generally in line with the policies of the Dublin City Development Plan 2005-11 and new Draft Plan 2011-17.

High buildings

The siting of high buildings at Grangegorman is unnecessary and unjustified in urban design terms. The dominant buildings in the area are and should remain the Clock Tower (former Penitentiary) building on Grangegorman and the nearby former Richmond Lunatic Asylum. The Grangegorman lands are elevated in relation to the city basin. The aforementioned classical historic buildings are eminently capable of performing a landmark function in the area. The proposal for the siting of high buildings is further inappropriate in light of the existing built environment adjacent to the Grangegorman lands which is defined by a two- and three-storied residential development scale, and also the numerous Protected Structures and other features within the historic landscape itself.

Impact on ecology

According to the plans, the last ecological assessment of the site was carried out in 2007. An up-to-

date ecological assessment needs to be carried out, and in greater detail. No decision should be made without the results and proposed mitigation measures of the Bat survey.

The invasive species of Giant Hogweed and Japanese Knotweed are to be removed from the site. On page 20 of the Environmental report it states: "The plant material removed will be disposed of in such a manner so as to ensure that these species are not spread to other locations". How the plant material will be treated, disposed of, and not spread should be detailed within the report.

The three proposed alternatives should include more measures to enhance the on-site habitats. For example, where the dry meadow grassland exists, these should be actively preserved and enhanced, similarly with the existing woodlands. As part of mitigating against the proposed development, there is potential to improve diversity and habitat significance within the site. This has not been adequately addressed within the SEA.

Yours sincerely,

Kevin Duff
Dublin City Association Planning sub-Committee

An Taisce
The Tailors' Hall
Back Lane
Dublin 8

Tel. 00353 1 707 70 62

Encl. Entry from 1995 Dublin Civic Trust buildings at risk list, 'Wasting Assets' concerning former Richmond Lunatic Asylum

DUBLIN CIVIC TRUST: Buildings at Risk List

ADDRESS: Former Richmond Asylum, St. Brendan's Hospital, Grangeegorman

Dublin 7 REF:



OWNER: Eastern Health Board

PLANNING: Unlisted portions of building demolished under planning exemption.

DUBLIN CURRENT LISTING:

CORPORATION: List 2 surviving front block

NATIONAL

MONUMENTS

REGISTER:

DERELICT

SITES ACT:

RECOMMENDED LISTING:

List 2

Section 8

IMPORTANCE: Front range of what was originally massive quadrangular structure which is one of the largest buildings in Dublin with an elevation almost as long as the Custom House. Designed by Francis Johnson during the vice-royalty of the Duke of Richmond, it is an impressive example of the severe institutional style of the early 19th C. with a massive central block recessed flanking wings & projecting end pavilions with pediments. The Duke of Richmond's coat of arms are superbly executed in granite above the main entrance & the whole building, built otherwise of rubble palpit limestone, bears a most severe & impressive appearance.

CURRENT STATUS: Although the front range of the building along with the 3 other rear ranges were given new roofs circa 1980, they were vacated by them mid 1980's as unsuitable for modern use. Following years of dereliction with massive break-ins & theft of timber floor boards & floor joists, the side & rear ranges were demolished in 1994 with the front range remaining because of its listed status, however the major part of this range is no more than a shell, though because of the thickness of the walls a massively sound one. To the front is a large green space of potentially great amenity value to the area.

RECOMMENDATIONS: The feasibility of finding an appropriate use for the building should be investigated. In view of its severe & monumental character, it would probably be inappropriate for housing. The best use would be enterprise units on the lines of the nearby SPADE project in the former St. Paul's Church in North King Street.

Grangegorman Residents Alliance, Pirooz Daneshmandi

Submission on the Draft Strategic Plan for Grangegorman

This submission is in two parts. Part I is concerned with planning aspects and Part II is concerned with movement and transport.

PART I

Of crucial significance in the drawing up of the Draft Strategic Plan for Grangegorman ('Draft Grangegorman Plan') is the requirement for it to comply with the Dublin City Development Plan, which, given the passage of time, will now be the Dublin City Development Plan 2011-2017 ('City Plan '11-17').

The Planning and Development Act 2000 (as amended) makes no provision for plans such as the Draft Grangegorman Plan to breach the provisions of the extant Development Plan. The City Plan '11-17 provides for a Plan to be drawn up for all areas which are identified for mid or high rise buildings.

Grangegorman is identified as an area for mid-rise buildings i.e. up to 50m. This does not, however, imply that any provisions of the City Plan '11-17 may be disregarded. The higher buildings must be designed and sited in a manner which complies with the policies and standards of the City Plan '11-17.

The Draft Grangegorman Plan fails to observe the policies, objectives and standards of the City Plan '11-17 and it conflicts with the conservation policies and objectives of the Department of the Environment, Heritage and Local Government (DoEHLG) Architectural Heritage Protection - Guidelines for Planning Authorities 2004 ('Architectural Guidelines') in regard to which, Policy FC26A of the City Plan '11-17 states:

"It is the policy of Dublin City Council: To continue to protect our built heritage, and development proposals affecting the built heritage will be assessed in accordance with the DoEHLG document 'Architectural Heritage Protection Guidelines for Planning Authorities, 2004'."

It also fails to meet its own objectives. At Sec.2.3.3 "Key Environment Considerations", the Draft Grangegorman Plan states:

"A special emphasis will be placed on the creation of an appropriate urban landscape which maximises the positive features of the existing landscape and in particular the architectural heritage on the Grangegorman site and the existing public open spaces and amenities".

Far from creating "an appropriate urban landscape" and maximising "the positive features of the existing landscape" and "architectural heritage" of the site (which, it cannot be disputed, are considerable), the Draft Grangegorman Plan succeeds in destroying many of the most valuable features of the site and in so doing creates a highly inappropriate urban landscape.

The Grangegorman Strategic Plan is seriously problematic in many respects. The fundamental and overriding difficulty is the excessive intensity of development envisaged for the site. It is bad planning on a number of grounds to endeavour to accommodate such a volume of development on a site of this size.

While the site is large and covers an area of 29.4 hectares, apart from three playing fields much of the site is to be occupied by a huge volume of development. The Plan provides for gross overdevelopment of the site.

DENSITY

As already stated any Plan drawn up for the subject site must comply with the City Plan '11-17. At Par. 17.3, the City Plan '11-17 specifies that densities will have to comply with the Department of the Environment, Heritage and Local Government Guidelines on Sustainable Residential Development in Urban Areas ('SRDUA').

SRDUA states in 'Appendix A: Measuring residential density', that:

"Density assumptions play an important part in estimating the development land requirements arising from a new dwelling requirement/forecast. Indeed, without the assumption about how many units can be accommodated in a given area, it would be impossible to move from forecast demand to an estimate of how much land will be needed."

The density of the proposed development on the site is not specified in the Plan. We are not told what plot ratio/site coverage will be considered suitable or what residential density will apply. It is of great concern that the densities resulting from the envisaged scale of development are likely to exceed the SRDUA recommended densities for a site such as this.

Section 5.10 of SRDUA refers to Institutional Lands (which this site clearly is) and states:

"in the development of such lands, average net densities at least in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in selected parts (say up to 70 dph)."

While the residential component of the site varies in accommodation type (student, social inclusion housing, hostel etc), the guideline provided in SRDUA is the standard to which the development should have regard.

Par. 5.10 of SRDUA goes on to state:

"The preparation of local area plans setting out targets for density yields, should be considered in advance of development".

Appendix A of SRDUA provides for the identification of densities in development of the type proposed for the subject site and states:

"Occupancy rates, such as persons or bed spaces per hectare, can be of use when an assessment of the numbers likely to live within a given area is important, e.g. in calculating open space requirements, or where special dwelling sizes – such as housing for the elderly – are likely to be involved."

SRDUA further states at Appendix A that:

"A net density is the most commonly used approach in allocating housing land within Local Area Plans..... It is also appropriate where phased development is taking place in a major development area (perhaps spanning different plan periods) and individual housing areas have been identified."

It is clear then that the Draft Grangegorman Plan fails to address this most important aspect of the development of the site and in doing so, is likely to lead to a contravention of the City Plan '11-17, with which any Plan for the Grangegorman site must comply on adoption.

HEIGHTS

The heights proposed for the area are excessive and utterly fail to have regard to the constraints of the site i.e.

- The topography of the site which would result in development as envisaged having a significant impact on a huge area of the city.
- The presence on the site of 11 Protected Structures as well as the boundary walls and gates.
- The residential context of the adjoining predominantly 2/3 storey houses.

Any one of these factors would require that the site be developed in a sensitive manner. The combination of the three factors on the site must surely dictate that great care must be taken to ensure that any possible negative impact on any one of them is minimised.

The Draft Grangegorman Plan, as drawn up, does the opposite in that it pays scant regard to any of these matters. In fact, it virtually disregards the impact of the proposed development on all three. In this regard, the Plan breaches several provisions of the City Plan '11-17.

Impact on historic city

Sec.4.3.7 'Building Heights' in the Draft Grangegorman Plan refers to building heights and states:

"The massing strategy for the building heights is shaped by the needs of DIT and HSE, the response to sunlight and wind conditions, and by the relationship with the neighbouring buildings on the edges of the site."

This statement is extraordinary, given the valuable built heritage located on the site and the imperative to protect it and its setting. Any consideration of development on the site must consider its impact on the Protected Structures as a priority, but very clearly in this instance they were disregarded.

Obviously, the first item listed i.e. the needs of DIT and HSE, took precedence over all others in determining the building heights and this is the fundamental weakness in the Draft Grangegorman Plan.

It has been policy of Dublin City Council for decades to protect the skyline of the Inner City and Policy SC16 of the City Plan '11-17 states:

"It is the policy of Dublin City Council: To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and site principles set out in the development Standards Section. In particular all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and Quays, Trinity College, the Cathedrals, Dublin Castle, the historic squares and the city canals."

When we look at the heights proposed for the site, we note that the 'Campanile' is to be 15 storeys high, development at the Broadstone Gate area is to be between 5 and 12 storeys high and the student accommodation between 4 and 8 storeys.

These heights on a site which is already at a considerable height relative to other sites in the city would be visible from an extensive area and have a significant impact on the skyline and on areas even at considerable distance from the site.

Development of the site with buildings of the scale and heights proposed would neither protect nor enhance the historic skyline of the inner city and would be likely to have a significantly detrimental impact on vistas from many sensitive areas of the city.

Impact on Protected Structures

Obviously, in drawing up the Draft Grangegorman Plan, Par.17.10.2 of the City Plan '11-17 was completely disregarded. Par 17.10.2 relates to matters that must be considered in assessing development within the curtilage of Protected Structures.

While the subject document does not comprise an application for development, it is a document which will inform the assessment of proposed development and consequently must not in any way allow for development which would be considered to contravene the City Plan '11-17. In that context it is important that Par.17.10.2 be observed.

It states that development within the curtilage of Protected Structures shall have regard to the following:

- *"The protected status of the structure and the need to protect its special character*
- *The various elements of the structure which give the protected structure its special character and how these would be impacted on by the proposed development*
- *Proximity of any new development to the main protected structure and any other buildings of heritage value*
- *The design of the new development, which should relate to and complement the special character of the protected structure."*

The Grangegorman Plan as it relates to the Protected Structures on the site utterly disregards Par.17.10.2. It is evident that, in drawing up the Plan, no regard was had to the setting or character of the protected structures on site.

Impact on Residential Areas

The City Plan '11 states at Par.17.9, that:

"The provision and protection of residential amenities is a primary concern of Dublin City Council. This will be achieved through the relevant objectives of the City Development Plan".

Many residential areas lie directly adjacent to the Grangegorman site. The specific residential zoning designations are Z1 and Z2 (residential conservation). The most significant objective in relation to residential use is the zoning objective.

The Z1 objective *“to protect, provide and improve residential amenities”* and Z2 *“to protect and/or improve the amenities of residential conservation areas”* couldn’t possibly be met as is required, if development of the site were to proceed as is envisaged in the Grangegorman Plan.

In fact, the heights envisaged for the site, as well as the intensity of use, would impact on residential amenities at a considerable distance from the site. Par.15.9 of the City Plan ’11-17 is relevant in this regard.

It relates to transitional zones and states:

“While the zoning objectives and development control standards indicate the different uses permitted in each zone, it is important to avoid abrupt transitions in scale and use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid developments which would be detrimental to the amenities of the more environmentally sensitive zone. For instance, in zones abutting residential development within predominantly mixed use zones, particular attention must be paid to the use, scale, density and design of development proposals and to landscaping and screening proposals in order to protect the amenities of residential properties.”

Due to the scale and density envisaged on the site, the amenities of residential properties in the area will not be protected as required, but rather, that they will in fact be greatly diminished. Another aspect of the Plan that is of serious concern is the failure to ensure that new buildings on the site harmonise in design and materials with the Protected Structures on site.

The Draft Grangegorman Plan states at Sec.4.3.2 Design Principles:

“Cohesiveness is aimed at promoting visual consistency among architecture and landscapes within the masterplanner’s control over the course of development of the Grangegorman Urban Quarter. Collectively, adjacent buildings maintain similarity by abiding to a prescribed massing and basic vertical organisation.”

It is a failing of the Draft Grangegorman Plan that it contains no indication that regard is to be had to the most significant buildings on site or that they would inform the design of the modern structures as should be the case.

IMPORTANT CONSIDERATIONS

Two aspects of the Draft Grangegorman Plan need to be addressed in greater detail: the proposed heights of buildings and the treatment of the Protected Structures on site.

HEIGHT

We all know that connections made in the past between the need to increase densities and the construction of high buildings, is now acknowledged as being without foundation. It is being increasingly recognised that heights over 6 storeys are found to be undesirable socially, environmentally and economically.

Socially, the oppressive impact of high rise on established communities and neighbourhoods is significant. Environmentally it has been found that heights over 6 storeys are less sustainable in terms of energy consumption and there is mounting global concern at the resource consumption (steel etc)

of high rise in a world of mounting energy cost. They have disproportionately higher heating and cooling costs as well as requiring the extensive use of lifts.

The paper prepared by Dublin City Council ('DCC') entitled "A review of the Discussion Document Maximising the City's Potential: A Strategy for Intensification and Height and Recommendations for Way Forward" September 2008 ('DCC Recommendations for Way Forward') on page 9, states:

"The construction of tall buildings will have, like any building process, environmental impacts associated with natural resource extraction for materials and the manufacturing of building materials. Taller buildings are also dependent on energy resources such as lifts, which utilise 5%-10% of overall electrical load and lighting which can use 10%-25%. There is also the burden of delivering water at height and handling the removal of waste. Wind funnelling at ground level can prove to be a significant problem with many tall buildings and indoor micro-climatic conditions can create overheating on the southern elevations."

In fact, arguments against tall buildings are actually stronger than stated above. Susan Roaf in her book 'Adapting Buildings and Cities for Climate Change' (Oxford, Architectural Press, 2005) tells us that building costs increase per square metre because of increased structure and construction specifications required to make them fire- and weather-proof and because of increased systems needed to operate the building – lifts, escalators, water pumping, heating systems.

This would appear to be verified by the DEGW Study, which on page 47, tells us that with high-rise buildings:

"Construction costs: Can be 75% more expensive than a low rise."

The environmental impacts are many. Taller buildings create higher wind speeds at street level – studies by the Building Research Establishment found that wind speeds in areas with high buildings regularly exceeded those in areas with low buildings. The problem of wind speeds will only increase with global warming.

Tall buildings are colder in winter and hotter in summer than regular buildings and so require more heating and more cooling. This is particularly true of modern 'glass' towers. In fact, Roaf states that tall buildings by their very nature can use twice as much energy as equivalent low buildings – to raise people, goods, water etc. and that lifts alone can account for between 5% and 15% of the running costs of a high building.

It is not a coincidence that in the current economic climate, the 3 highest buildings that have been granted permission by Dublin City Council have all been put 'on hold' – the O2 Tower, the Watch Tower and the Eircom Tower at Kilmainham.

Rationale for higher buildings

The reasons now being put forward for high buildings focus mainly on economics and identity. The DCC Recommendations for Way Forward referred to earlier, states:

"The reasons for height are much fewer than those for density and focus mainly on identity/place-making and economics."

The DCC Review of Densities which formed part of the documentation studied in preparation for the Issues Paper which initiated the Development Plan process, indicates at pg 5 that a 5 storey block at a plot ratio of 1.5:1 will produce a density of 165 units /dwellings per ha.

This density grossly exceeds the 70 dwellings per hectare which SRDUA sets out as a MAXIMUM on Institutional lands referred to earlier (Par. 5.10) which states:

“In the development of such lands, average net densities at least in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in selected parts (say up to 70dph).” (this section relates specifically to Institutional lands in cities and larger towns).

It is also very important to note that the “Review of Residential Schemes in the Dublin Area” prepared for DCC by Barnes Consulting dated March 2007 concludes that:

“There was no evident link between developments over 6 storeys and higher densities or plot ratios”.

With this in mind, it is very difficult to understand the heights (from 4 to 15 storeys) envisaged in the Draft Grangegorman Plan and the massive scale of overdevelopment being proposed for the site is obvious.

Street to height ratio

The open space environment created by the excessively tall buildings and their proximity to each other is likely to be highly unsatisfactory with excessive shadow and loss of sunlight as well as the wind tunnel effects referred to earlier.

The Liberties Local Area Plan has a suggested street to building height width of 1:1.5 for sites such as the subject site where no street condition exists. This ratio should also pertain on the Grangegorman site – as a maximum ratio.

CONSERVATION

The target set in relation to architectural heritage on the site in the Strategic Environmental Assessment accompanying the Draft Grangegorman Plan is:

“No adverse impact on all protected structures on site”.

It is difficult to understand how a Plan could be drawn up that would demonstrate such disregard for those same structures. It is of great concern that the Architectural Guidelines issued by the DoEHLG are not being complied with in the Draft Grangegorman Plan.

The Architectural Guidelines echo the Planning and Development Act 2000 in stating at Par.2.1.1 that a Protected Structure is one which is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The Grangegorman site is particularly rich in architectural heritage in that 11 buildings within the site are listed on the Protected Structure Register as are the walls and the gates.

The Dublin City Development Plan 2011-2017 Policy FC26A states:

“It is the policy of Dublin City Council: To continue to protect our built heritage, and development proposals affecting the built heritage will be assessed in accordance with the DoEHLG document “Architectural Heritage Protection Guidelines for Planning Authorities, 2004”.

The said Architectural Guidelines in accordance with which development proposals will be assessed, provide guidance on the treatment and care of Protected Structures as well as guidance on the

treatment of the curtilage and the attendant grounds of the Protected Structures. The provisions relating to the curtilage of Protected Structures are particularly relevant in this instance.

Par. 13.5.1 states:

“Proposals for new development within the curtilage of a protected structure should be carefully scrutinised by the planning authority, as inappropriate development will be detrimental to the character of the structure.”

It is further stated at Par.13.7 that:

“It is essential to understand the character of a site before development proposals can be considered.”

The negative impact of the proposed buildings on the Protected Structures on the site is alarming. The proposed buildings are of such a scale, mass and bulk that they overwhelm the Protected Structures. This is of course, contrary to best conservation practice which dictates that the setting of a Protected Structure should not be negatively impacted.

Par. 13.8.2 of the Architectural Guidelines state:

“New development both adjacent to, and at a distance from, a protected structure can affect its character and special interest and impact on it in a variety of ways..... A new development could also have an impact even when it is detached from the protected structure and outside the curtilage and attendant grounds but is visible in an important view of or from the protected structure.”

Again, at Par. 13.8.3 it states:

“Large buildings, sometimes at a considerable distance, can alter views to or from the protected structure or ACA and thus affect their character. Proposals should not have an adverse effect on the special interest of the protected structure....”

The heights of the proposed new buildings as set out in the Draft Grangegorman Plan would have a significant and detrimental effect on the character of the Protected Structures both within the setting of the site, in the immediate vicinity (such as St. Dymphna’s) and at a distance from the site.

Indeed, the richness of the architectural heritage of this area is reflected in the many Protected Structures in the vicinity, some as notable as King’s Inns. It is inevitable that the heights of buildings proposed for the site will negatively impact on many of these important structures.

When referring to built heritage in Par.7.5.2.5 the City Plan ’11-17 sets out as a policy (FC28):

“To maintain and enhance the potential of protected structures and other buildings of architectural/historical merit to contribute to the cultural character and identity of the place....”

It is obvious that the setting of many Protected Structures would be severely compromised by the scale and proximity of the proposed buildings, that the conservation policies and objectives of the City Plan ’11-17 as well as the provisions of the Architectural Guidelines could not be met due to the overwhelming impact of the scale and location vis-à-vis the Protected Structures.

In this context, Par. 13.8.1 the Architectural Guidelines are worth noting with regard to the strength of the imperative to protect the character of Protected Structures:

“When dealing with applications for works outside the curtilage and attendant grounds of a protected structure or outside an ACA which have the potential to impact upon their character, similar consideration should be given as for proposed development within the attendant grounds.”

It is abundantly clear that inadequate consideration has been given to the setting of many of the Protected Structures on the site. It is evident that rather than being granted a position of deference as is their due, the Protected Structures are completely swamped by the proposed buildings both in scale and by location.

A look at any of the images presented in the Draft Grangegorman Plan and a closer examination of the setting of the Protected Structures will illustrate this clearly.

- The Richmond Lunatic Asylum dating from 1810 (No.11 pg4.70) is a three-storey finely proportioned building of significant scale. The proposal is to construct student accommodation blocks in such close proximity to, and directly in front of the building in a manner which effectively cuts off both wings from view. The setting of the Protected Structure is further diminished by the awkward juxtaposition of one of the student accommodation blocks arranged at an angle. It is obvious that if the Protected Structure were treated in accordance with the Architectural Guidelines, such development in the vicinity could not be contemplated. The entire area to the front of the Protected Structure as far as the boundary of the site is designated a Conservation Area which renders Par.7.2.5.3 of the City Plan '11-17 relevant.

It states:

“The special value of conservation areas lies in the architectural design and scale of these areas and it is of sufficient importance to require care in dealing with development proposals and works by the private and public sector alike. Dublin City Council will thus seek to ensure that development proposals within all conservation areas complement the character of the area, including the setting of protected structures, and comply with development standards.”

The buildings proposed to be constructed within the Conservation Area immediately to the front of the Protected Structure in this instance, rising from 4 to 6 storeys, utterly fail to complement the character or the setting of the Protected Structure and so must not be considered.

- The scale of buildings adjoining the Clock Tower building, dating from 1814, fails to have due regard to the setting and character of the Protected Structure and so is not in compliance with the Architectural Guidelines or the conservation provisions of the City Plan '11-17.
- The group of buildings comprising the Mortuary, the Female House, the Male Infirmary, the Roman Catholic Church and the Female Infirmary, are predominantly two-storey and all date from the Victorian period with the exception of the Mortuary which is an Edwardian structure. All of these Protected Structures would be overwhelmed by the scale of development envisaged (4, 5, and 6 storey buildings) in the immediate vicinity.

Also, the interventions to the front façade of the Female House are inappropriate and contrary to best conservation practice. Its integrity should be retained so that the contextual relationship with the Male Infirmary, Catholic Church and Female Infirmary is not interfered with.

- The interjection of development between the Church of Ireland chapel and the Male Infirmary, Female Infirmary and Roman Catholic Church is extremely intrusive and damaging to the setting of these four Protected Structures and should not be contemplated.

- The single storey Laundry Building, dating from 1895 is similarly overwhelmed by surrounding buildings.

DEMOLITION

The demolition of the neo-Georgian style Nurses' Home dating from 1938, which very satisfactorily compliments the adjoining clock-tower building in scale and design, is highly objectionable. It is a solid structure of high grade materials which is of architectural merit (as acknowledged in the previous architectural appraisals).

In this regard, its demolition would fail to comply with Par.7.2.5.1 of the City Plan '11-17, which states:

"The retention, rehabilitation and reuse of older buildings can play a pivotal role in the sustainable development of the city. In many cases they make a positive contribution to both streetscape and sense of place."

Par.17.10.5 of the City Plan '11-17 makes the point more strongly:

"The reuse of older buildings of significance is a central element in the conservation of the built heritage of the city and important to the achievement of sustainability. In assessing applications to demolish older buildings which are not protected, the Planning Authority will actively seek the retention and re-use of buildings/structures of historic, architectural, cultural, artistic and/or local interest or buildings which make a positive contribution to the character and identity of streetscapes and the sustainable development of the city."

There is little doubt that the building in question fits the above description of buildings whose reuse is a "central element" in the conservation of the built heritage of the city.

The demolition of this building would also directly conflict with Par.16.1.11 of the City Plan '11-17, which states:

"To minimise the waste of embodied energy in existing structures, the re-use of existing buildings should always be considered as a first option in preference to demolition and new-build."

TREES

The felling of mature trees of quality as is indicated at 4:66 'Design Objective 10' is highly objectionable:

"GDA will seek to retain a substantial majority of the existing mature trees of quality ..."

Every effort should be made to ensure the retention of ALL healthy mature trees on site and any attempt to remove trees of quality should be opposed. In fact, given the very significant contribution made to the quality of the landscape by the mature trees, a key objective in drawing up the Plan should have been the conservation of as many mature trees as possible.

Given the degree to which the Draft Grangegorman Plan fails to comply with provisions of the City Plan '11-17 and with the DoEHLG Architectural Guidelines, as well as the degree to which it fails to reflect the views of members of the public expressed repeatedly at meetings, the Plan must be revised in such a manner as to ensure compliance with the aforementioned, as is required.

The need for the sheer scale of the buildings in this plan is highly questionable. The floor space in this plan more than doubles the current floor space occupied by DIT currently. However, even DIT are not forecasting anything approaching a doubling of student numbers.

There are no figures supplied for the rate of occupancy of the existing classrooms, no doubt any addition to the students numbers can be accommodated by a better use of the current building levels. Furthermore, there are some current DIT buildings as well as other suitable buildings close enough to Grangegorman to be incorporated into the campus that would obviate the need for so many new buildings on site and thereby eliminating many of the problems listed elsewhere in this submission.

Documents mentioned above:

Title	Author/Publisher	Year
Draft Strategic Plan for Grangegorman	Grangegorman Development Agency	2010
Dublin City Development Plan 2011 – 2017	Dublin City Council	2010
Architectural Heritage Protection Guidelines for Planning Authorities	Department Of Environment, Heritage and Local Government	2004
Sustainable Residential Development in Urban Areas	Department Of Environment, Heritage and Local Government	May 2009
A Review of the Discussion Document Maximising the City's Potential: A Strategy for Intensification and Height and Recommendations for Way Forward	Dublin City Council	September 2008
Adapting Buildings and Cities for Climate Change	Susan Roaf (Published by Oxford Architectural Press)	2005
Managing Intensification and Change: A Strategy for Dublin Building Height, DEGW	Dublin City Council	2000
Review of Residential Schemes in the Dublin Area	Barnes Consulting for Dublin City Council	March 2007

PART II

Introduction

General

This report was prepared on behalf of the Grangegorman Residents Alliance to address transport and related matters.

The Alliance has concerns about the proposed development of the Grangegorman site and the inability, within the framework of the proposed Strategic Plan, of the surrounding transport systems to

handle the associated loading. Of note, within the documents, there is a substantial and under-appreciated link between land use and transport. While it is proposed to move 20,000-30,000 people to the site, there is little improvement proposed to the transport systems, which already have difficulty accommodating existing users.

Further, the proposed “Big bang”, with many DIT departments moving to Grangegorman in a single year is undesirable and poses potential risks that have not been addressed, which may lead to technical, resource, financial, social and academic difficulties, e.g. limited consideration seems to have been given to the provision of a mobile phone system to handle a large shift in population to a very dense site.

Within the documents there are matters that are over-stated and incorrect assertions are made, e.g. Luas Line BXD is consistently shown on the wrong streets, the site is stated to be with 1 km of the city centre, green corridors are exaggerated and access routes are shown across third party lands that may not be available. On some drawings, scale is severely distorted, with people shown as tall as double deck buses. There is a lack of consistency across the documents as to the total amount of buildings to be built with various totals varying between 200,000 and 400,000m². While potential elevations of buildings are shown, these do not necessarily reconcile with the plans shown. The overall impression of the proposed Strategic Plan is one of aspiration and not specification. In light of the recession, it may be difficult to fund the works without recourse to significant exchequer funds, as the value of the existing DIT properties may have dropped 50%, while construction prices have only dropped 30%.

Importantly, in the absence of the currently unfunded Luas Line BXD the development fails to put any rail or Luas stop within a 12-minute (1 km) isochrone of the centre of the site, which means the site will almost exclusively rely on road transport.

The lack of a glossary associated with the documents associated with the public consultation is a hindrance, e.g. in common planning and transport usage “GDA” refers to the Greater Dublin Area, but in those documents refers to the Grangegorman Development Area / Agency. A limited glossary has been attached to this report.

Statutory position (Grangegorman Development Agency Act 2005)

Sections 9 and 12 of the act set out several responsibilities for the Grangegorman Development Agency.

“9.-(1) The functions of the Agency shall be to-

...

(j) consult with the relevant organisations to address the issue of providing adequate public transport to service the Grangegorman site,

12.-(1) The Agency shall, as soon as may be after its establishment, prepare a plan (which is in this Act referred to as a “strategic plan”) for the strategic development of the Grangegorman site in consultation with the Dublin Institute of Technology, the Health Service Executive, the Minister and the Minister for Health and Children.

(2) The strategic plan shall consist of a written statement and a plan indicating the objectives for the development of the Grangegorman site, including-

(a) the provision for the needs of the Minister, the Minister for Health and Children, the Dublin Institute of Technology, the Health Service Executive and the Grangegorman neighbourhood,

(b) the provision of services (for example, roads, water, transport on site),

(c) public transport requirements,

...”

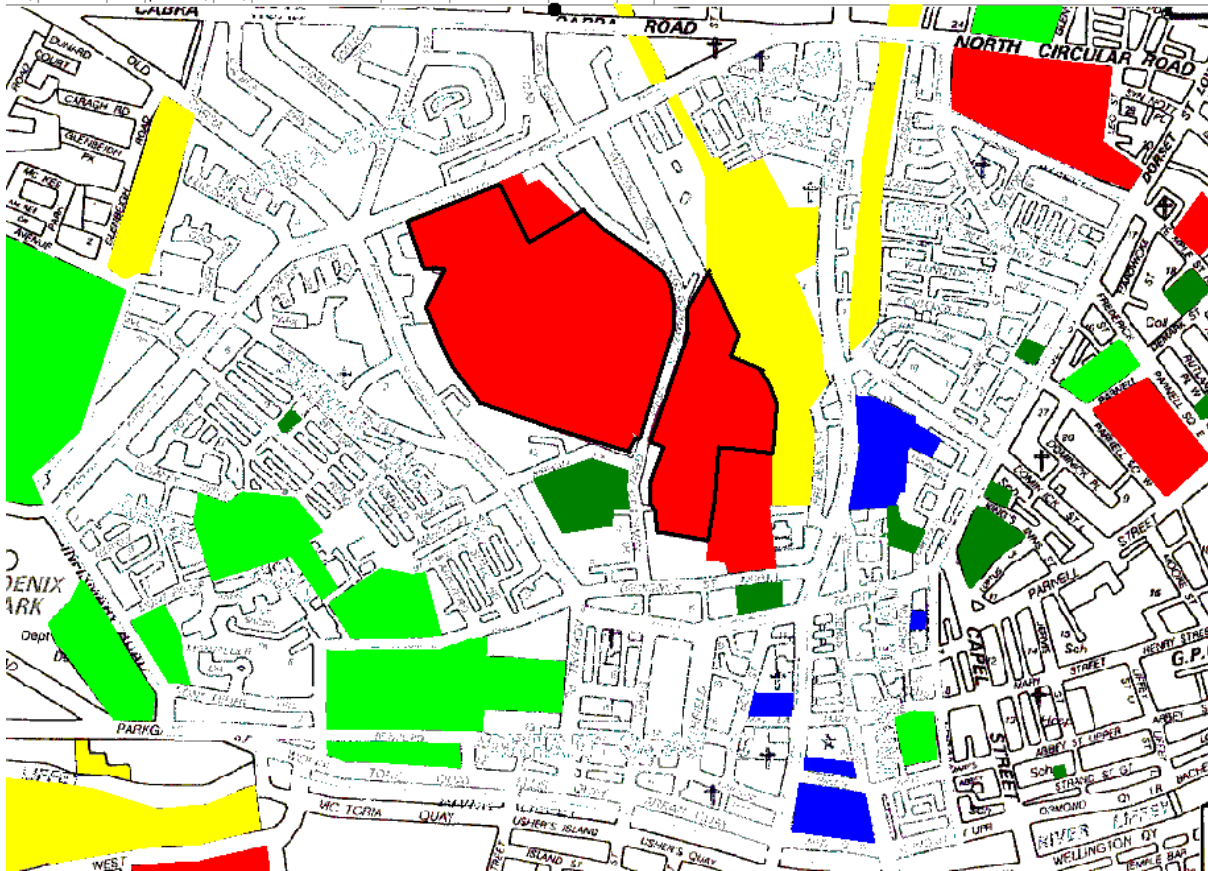
In relation to transport and related matters, there is a relative absence of detail and the natural conclusion of this is that there has also been a relative absence of planning.

Notably, the agency is relying on the proposed Luas Line BXD to provide the bulk of the transport to the site. Not only is the line not funded under the changes to Transport 21 in the revised Programme for Government or under the National Recovery Plan 2011-2014. Further, the reliance on bus transport to deliver much of the balance of commuting needs is less than ideal as, like Luas Line BXD, it does so at the periphery of the site, making it less desirable.

Understanding of the Current Status

Historical Land Use

The historical land uses in the Grangegorman Neighbourhood (GGN) and surrounding areas were dominated by transport, institutional, government and civic uses. The city's central business district lay to the east and south east of the GGN.



Map: Historical institutional and similar and uses – institutional / health (red), transport (yellow), law (navy), government / civic (light green), education (dark green)

Transport: The Grand Canal (Broadstone Branch and Blessington Street and Broadstone basins) and Midland Great Western Railway (MGWR) station, works and line at Broadstone. These gradually declined in usefulness, as they were perceived to be away from the commercial core and as their systems were extended to connect east of the city centre with other railways and Dublin Port.

The Great Southern & Western Railway (GSRW) station and yard at Heuston Station. The GSRW system was extended first to Glasnevin and then to Connolly Station and Dublin Port and sidings were built at Cabra to serve the cattle market at Drumalee Road. Dublin's tram system, even at its height in the early 20th century failed to serve Broadstone station and the GGN other than with lines on the Liffey quays, North Circular Road and Bolton Street-Dorset Street axis.

The River Liffey provided a limited transport route for barges between the Guinness Brewery at St. James's Gate and Dublin Port.

Institutional: The hospital complexes on either side of Grangegorman including the Richmond Lunatic Asylum, Richmond District Lunatic Asylum, Richmond Hospital, Hardwicke Fever Hospital and Whitworth Hospital. The Mater Misericordiae Hospital, Children's University Hospital (Temple Street), Rotunda Hospital, Dr. Steevens' Hospital and St. Patrick's Hospital are just outside the GGN. Further

the North Union Workhouse, Richmond Penitentiary and St. Mary's Industrial Training School were at Grangegorman and a "Female Orphan House" at Hanlon's Corner.

Government: Military uses in the GGN and immediate surrounds were at Collins Barracks, McKee Barracks, Clancy Barracks, Linenhall Barracks, the Magazine Fort, Arbour Hill Prison, St. Brigid's Hospital, Royal Hospital, Royal Military Infirmary and the Isolation Hospital at Infirmary Road and military stores at Infirmary Road and Wolfe Tone Quay.

Legal uses were at the Four Courts, Chancery Street Courthouse, Chancery Place Courthouse, Green Street Court House, Public Records Building, Kings Inns, Law Society, Garda Headquarters (initially at the Royal Hospital and then Phoenix Park in the former Dublin Metropolitan Police Depot), the Bridewell and Mountjoy Garda stations and Mountjoy, New Gate and Arbour Hill prisons.

Education uses at the existing DIT Bolton Street / Linenhall Campus, Kings Inns, Law Society and a variety of primary and secondary schools serving local needs.

Civic: Dublin City Council owns a variety of properties including council yards and stores, Phibsborough Fire Station, Phibsborough Library and a variety of wholesale markets. The museum and gallery at Parnell Square are just outside the GGN area.

Other Uses: The balance of the area was made up of mixed commercial and industrial/warehouse uses in the vicinity of Smithfield and the Four Courts with residential areas broken up and isolated by the other land uses. While housing east of the Church Street-Phibsborough Road axis was initially first class in nature, this gradually declined initially as their wealthy residents moved south of the Liffey in the 18th & 19th centuries and then as they moved from the city in the 19th & 20th centuries.

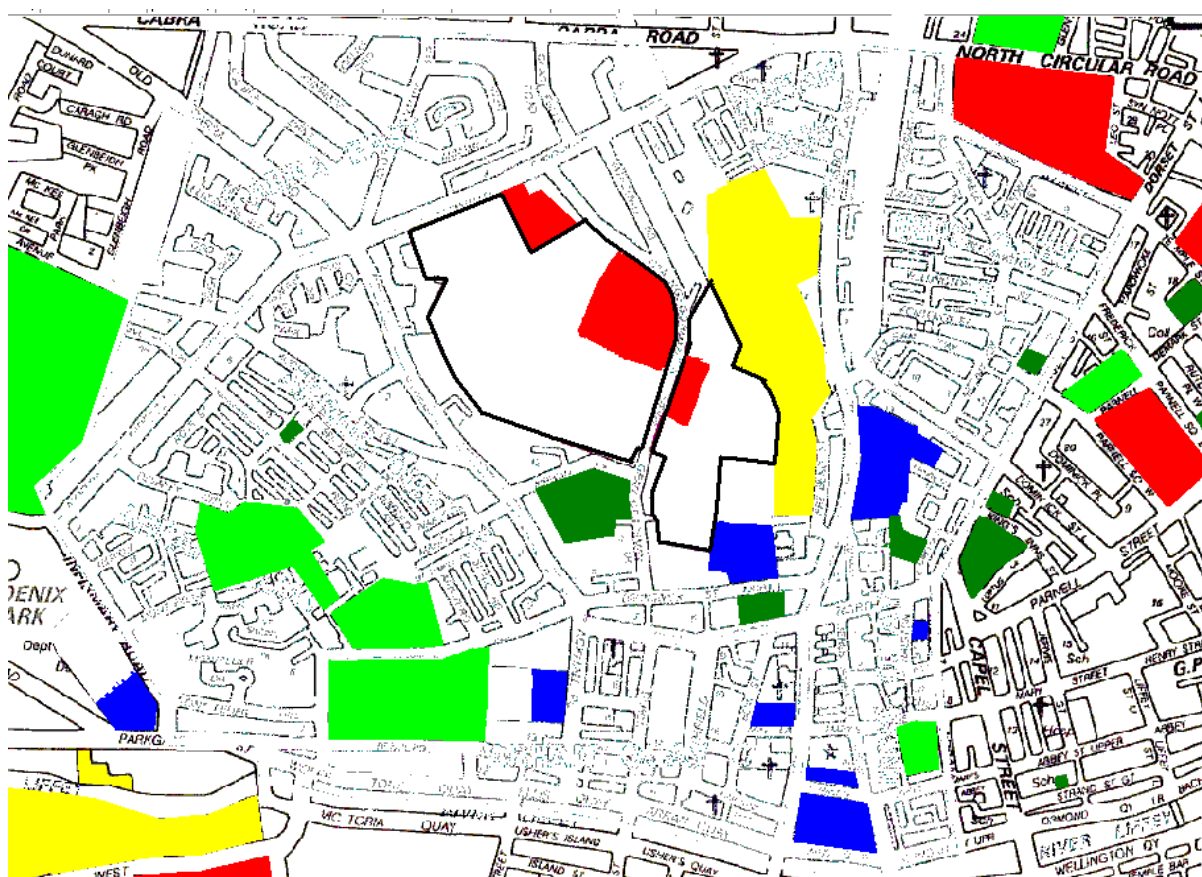
Current and Evolving Land Uses

The current and evolving land uses in the GGN and surrounding areas remain dominated by transport, institutional, civic and government uses. The city's central business district lies to the east and south east of the GGN and while it has expanded, the focal point continues the centuries-long pattern of moving further east.

Transport: The Grand Canal and MGWR are gone from Broadstone, with the former railway lands used as bus depots for Bus Éireann and Dublin Bus. However, the railway corridor is largely intact. Heuston Station now has a predominantly passenger focus, while the Cabra Sidings have been sold off and the cattle market was redeveloped as housing.

In the early to mid 20th century, trams were gradually replaced with buses. However, trams were re-introduced with the opening of the Luas in 2004, which has gradually expanded. Importantly for the GGN, Luas Line BXD is proposed to extend from the St. Stephen's Green along the O'Connell Street axis to Broadstone and along the former railway line to Liffey Junction and Broombridge.

The Guinness Brewery remains the most important industrial enterprise in the city centre, but all transport is now road based.



Map: Current institutional and similar and uses – institutional / health (red), transport (yellow), law (navy), government / civic (light green), education (dark green)

Institutional: Of the institutional properties at Grangegorman essentially only St. Brendan's and the Legion of Mary Hostel remain, with many buildings having been cleared while some have been converted to other uses. The bulk of the Grangegorman lands are expected to be redeveloped as a single campus for DIT, HSE and community with ancillary uses.

Government: Many of the military lands have changed use, with Collins Barracks becoming part of the National Museum in an as yet incomplete project, Clancy Barracks is being redeveloped as a residential and commercial area, Linenhall Barracks was destroyed in 1916 and redeveloped as housing, the Magazine Fort is derelict, while Arbour Hill Prison has been civilianised and the Royal Hospital was initially Garda Headquarters and now the Irish Museum of Modern Art. The Department of Defence is in the process of being relocated, while other sites have been consolidated with some land sales.

Criminal law cases have moved to the Courts of Criminal Justice, which have recently been developed, on the former Garda vehicle pound at Parkgate Street and part of the Department of Defence site. With the Four Courts freed up, there is likely to be some consolidation of Courts Service properties in Dublin, which are predominantly in the GGN at sites including Smithfield, Phoenix Street and East Essex Street (Temple Bar). The Richmond Courthouse has been developed at the former Richmond Hospital building. The Mountjoy Prison site is expected to be sold when Thornton Hall is developed. The Probation Service has office at Smithfield.

Most of the lands used for education and civic uses remain so used although the markets are expected to be redeveloped.

Other Uses: Industrial/warehouse use has all but disappeared from the GGN with many sites having gone through dereliction to mostly being redeveloped for residential and limited commercial development.

Some mixed commercial use exists in the vicinity of Smithfield and the Four Courts, along the Liffey Quays. Local and district services are provided at Prussia Street-Stoneybatter, Parkgate Street and Phibsborough.

Many of the traditional residential areas declined through 18-19th century ghettofication and urban decay and later 19-20th century suburbanisation and 20th century re-housing programmes.

Future Land Use

While delayed by the current recession, the dominant changes that can be expected in the next 10-20 years are the development of the Grangegorman and Broadstone sites and infill development on smaller underused or derelict sites.

There is a risk that, in implementing a "big bang" approach that there will be unexpected and/or undesirable impacts on the neighbouring communities. As the DIT is currently spread across approximately 30-40 buildings in four main clusters, primarily in the city centre and Rathmines and the effect of any one building or cluster is diluted.



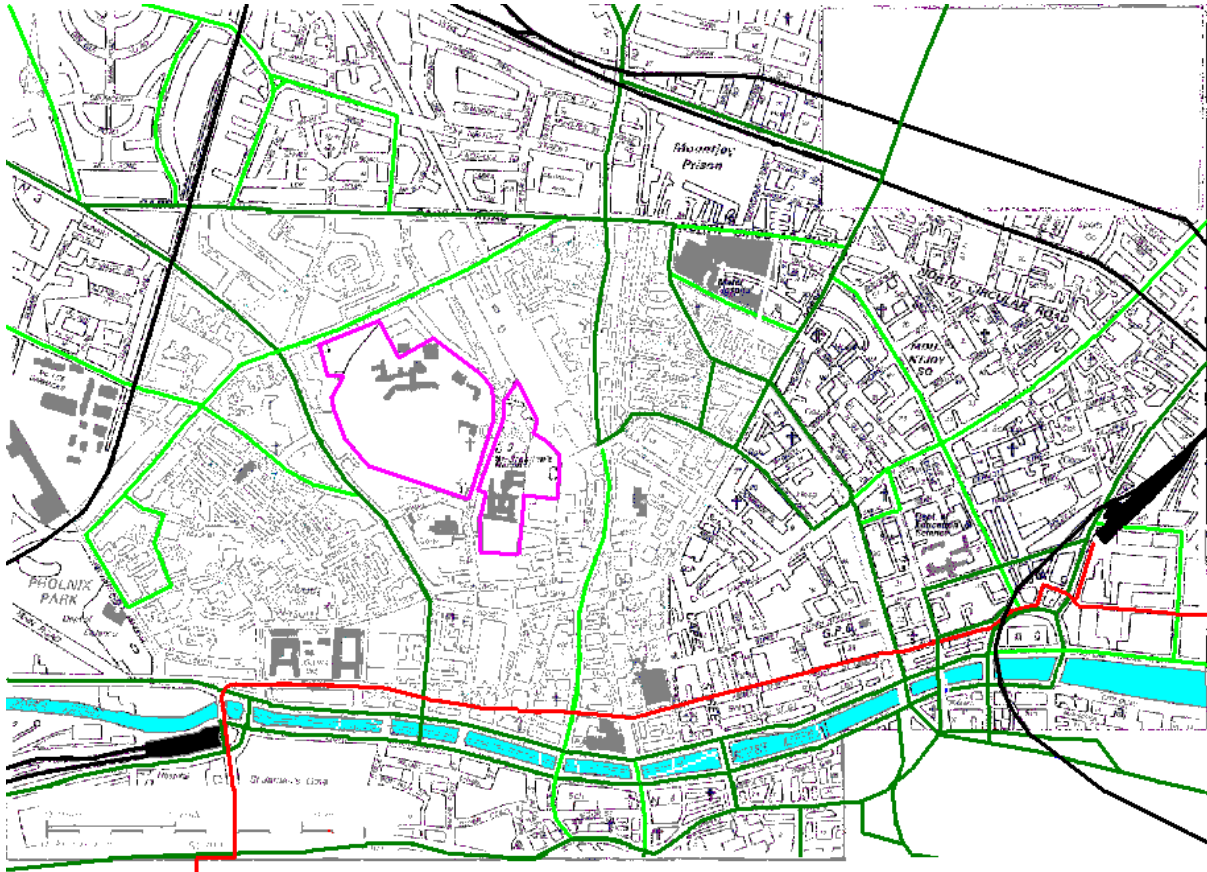
Map: Existing DIT sites. From dit.ie Base map Google.

Existing Transport

The existing transport system in the GGN is dominated by a road system developed in the period up to the 18-19th century when the North Circular Road was built as a means of avoiding travel via the city centre. The routes follow historical patterns along the Liffey quays and radially from the historic core that formed around Oxmanstown and Christchurch and a modern route structure is absent. A grid system exists in a limited area around Smithfield and the Four Courts, although this is fractured by poor junctions, variable road width and a general lack of continuity. The

rest of the road layout is in 18-19th century terraced streets and 20th century housing estates with limited permeability to non-pedestrian traffic.

Traffic on these roads is dominated by commuter through-traffic, primarily by car, but bus is also important. Local transport within the GGN is dominated by public transport and pedestrian means.



Map: Existing Transport - City Centre. Major bus route (multiple routes - dark green), minor bus route (light green), Luas (red), Irish Rail (black)

Bus services within the GGN are primarily routes to and from the city centre, although services are additionally provided to Heuston Station and the Dublin Bus route 46a (formerly route 10/10a) provides a semi-circular route on the O'Connell Street axis and North Circular Road. Only those services on the North Circular Road and Prussia Street can be considered to serve the Grangegorman Development Agency Area (GGDAA).

While four rail corridors exist on the boundaries of the GGN, only the Luas Red Line currently provides any meaningful passengers services. However, the line is remote from and does not adequately serve the GGDAA.



Map:

Existing Transport - From Grangegorman site to the wider city. Bus route data mkmap.com/dublin Base mapping Google

Proposed Transport

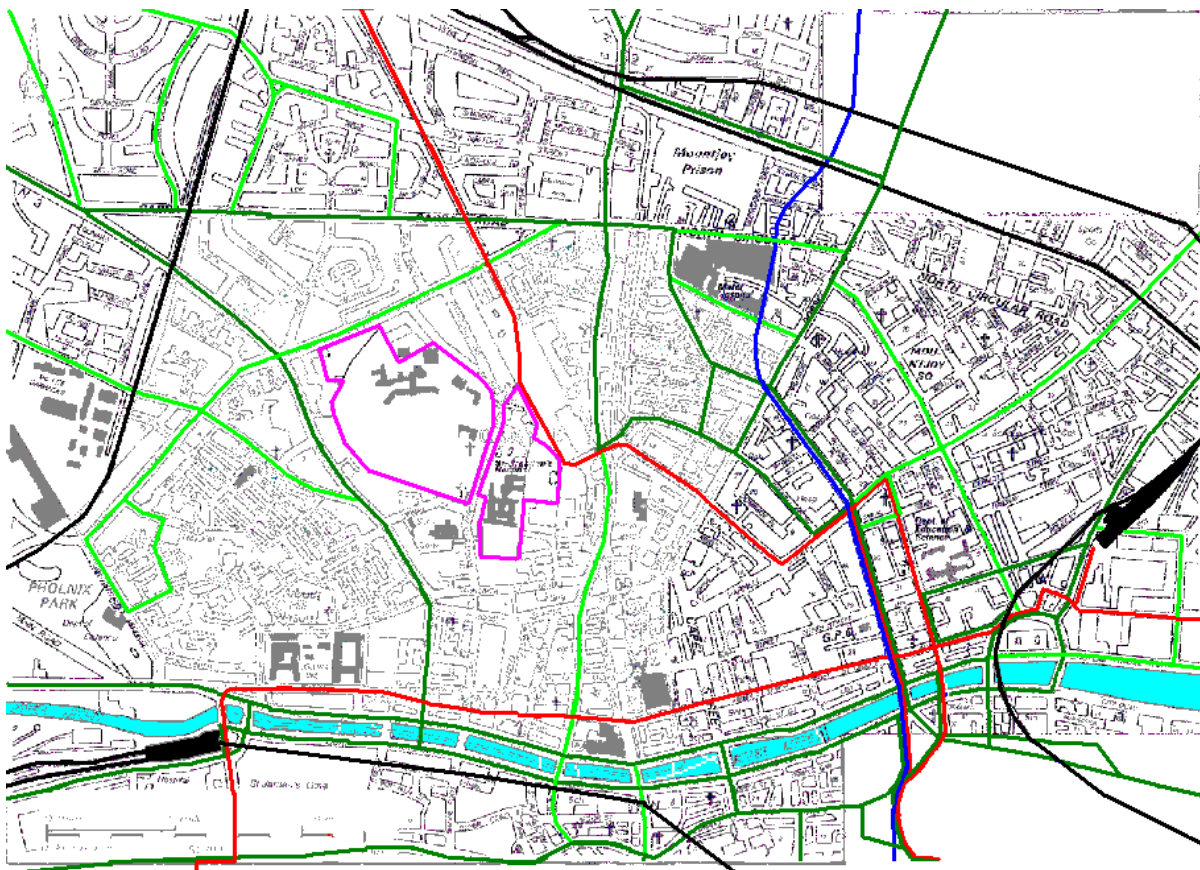
In the immediate short term, the main change in transport for the area will be the implementation of the Dublin Bus Network Direct project, which will see the rationalisation and amalgamation of routes, the provision of so-called clock face timetables on many of those routes and the relocation of some termini and bus stands away from the very city centre. Overall, the intention is to provide a more legible and more frequent service with higher passenger numbers and lower net cost.

The first two phases of Network Direct has seen the reorganisation of route on the Stillorgan and Blanchardstown corridors, many of which affect the GGN. The next phase is expected to be with routes on the Lucan corridor, which will affect routes along the Liffey Quays.

Metro North and DART Underground are two large rail projects that are expected to provide rail services to the existing business core in Dublin City.

Metro North will pass along the eastern edge of the GGN on its journey from St. Stephen's Green to Swords via Dublin Airport. There will be a short section of tunnel passing through the GGN, but no station will be within the GGN and the stations at O'Connell Bridge, Parnell Square and the Mater Hospital will each be more than 1km from the GGDAA. While Metro North will provide some links to the GGDAA, these will need connections to provide a meaningful level of service.

The DART Underground project will, via the Interconnector tunnel, provide services from Drogheda to Hazelhatch via stations at Docklands, St. Stephen's Green, Christchurch, Heuston Station and Inchicore. Again, all the stations are outside the GGN and connecting services will be required to serve the GGDAA.



Map: Proposed Transport - City Centre. Major bus route (multiple routes - dark green), minor bus route (light green), Luas (red), Irish Rail (black), Metro North (navy)

DART Underground will see a re-configuration of the existing DART with Bray services heading towards Maynooth via Connolly Station and Drumcondra. There is potential to provide a station at Phibsborough / Glasnevin although this is not specifically planned. While this would bring DART closer to the northern boundary of the GGN, again the potential to serve the GGDA is limited.

CIÉ have indicated that there is potential to put a station or stations on the currently under-used line from Heuston station to Glasnevin. The line is along the western boundary of the GGN. While this would provide a station or stations relatively close to the GGDA, the development of the line provides less meaningful connections to the rest of the city and is low on the hierarchy of possible developments.

While Luas Line BXD is proposed to extend the Luas Green line from St. Stephen's Green via the O'Connell Street axis to Broadstone and along the former railway line to Liffey Junction and Broombridge, this project is outside the remit of the GGDA and CIÉ. A railway order has been applied for. However, in Transport 21 under the revised Programme for Government and The National Recovery Plan 2011-2014 the project is unfunded and not seen as a priority.

Overall, despite being a new "city quarter", Grangegorman risks having no rail service. Further, even if Luas Line BXD is developed, it will be through the Broadstone lands and while it will serve the high-density development proposed in that section of the GGDA, it will not meaningfully serve the western end of the GGDA or GGN.

Existing Socio-Economic Situation

Total Population

The existing population of the GGN is listed at 24,500 in the 2006 census with 3,692 being the population of the Arran Quay B Electoral Division (ED), which contains the GGDA. While the ED was

broken into four Enumeration Areas, it was partly linked to the Cabra East C ED and only limited information has been published.

The population of the GGDA is not readily determinable for the data, but the enumerated population is like to primarily comprise of the patients and staff of St. Brendan's Hospital that were present on census night. A limited number of private households are within the GGDA.

The *2006 Census** enumerated the population of the Dublin region as 1,187,176 and *Population and Migration Estimates*** (CSO, April 2010) is estimated at 1,207,300 which represents an increase of approximately 1.7%. However, this increase will not have been distributed equally. While a new census will take place in April 2011 and preliminary data will be available a few months later, it is difficult to determine what the current populations of the GGN and GGDA are. However, it is unlikely that the population of the GGN has dramatically changed, although there are likely to have been population increases in the Arran Quay C ED, which includes the redeveloped areas around Smithfield.

*<http://www.cso.ie/census/documents/Amended%20Final%20Principal%20Demographic%20Results%202006.pdf>

** http://www.cso.ie/releasespublications/documents/population/2010/popmig_2010.pdf

Population Density



Map: Population density in the Grangegorman area.

The population density of the GGN and surrounding EDs varies widely with a population density of approximately 19,500 persons per square kilometre in Rotunda A to 5,100 in Arran Quay B (Grangegorman) to 200 persons per square km in the Phoenix Park ED. Arran Quay B is peculiar, in that while much of the ED is open space, the balance is very densely populated, resulting in an overall medium density.

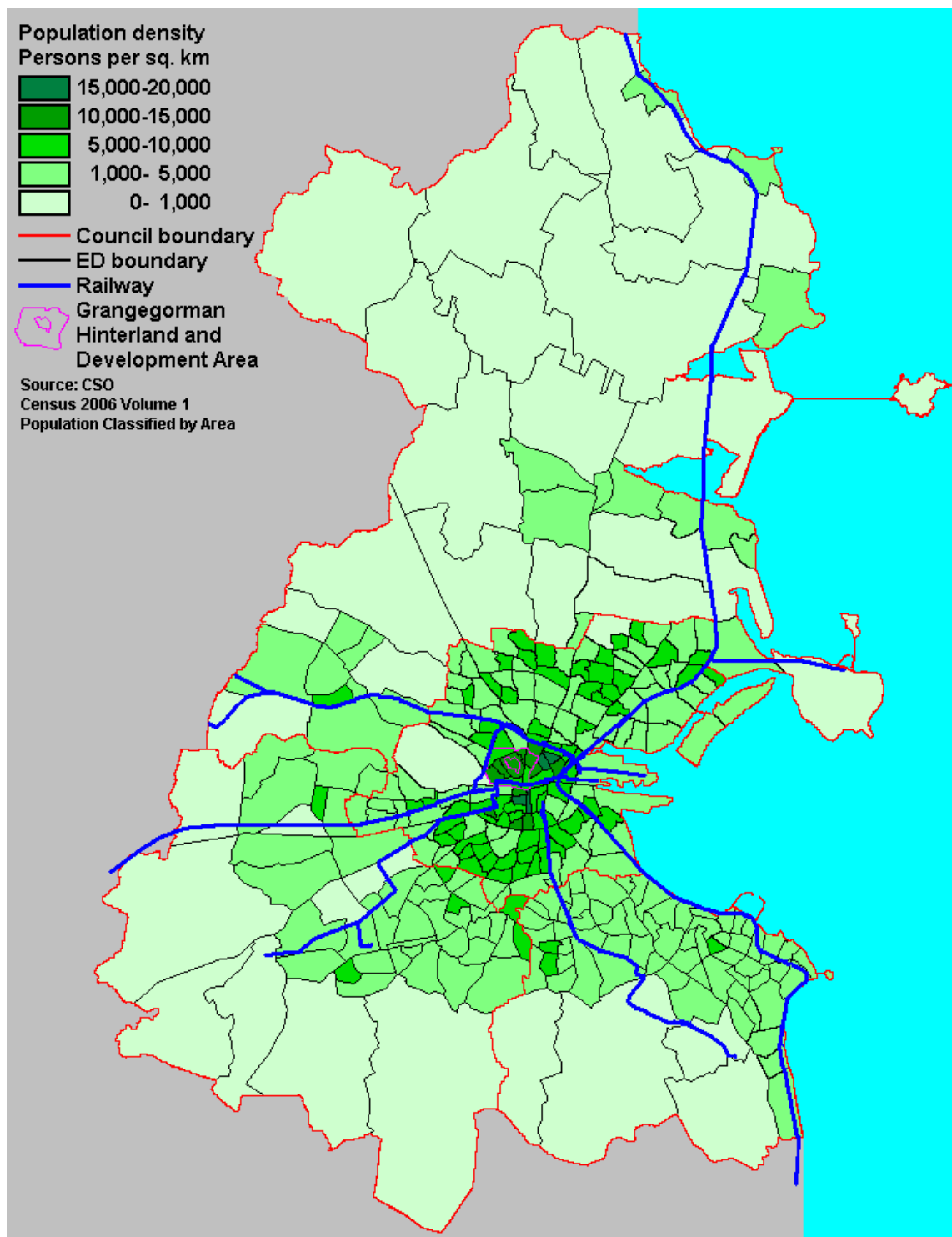
Census 2006 Volume 1 - Population Classified by Area Table 6 - Population and area of each Province, County, City, urban area, rural area and Electoral Division, 2002 and 2006

Geographic Area	Persons 2006	Area * (hectares)	Density
<i>Dublin County and City</i>	1,187,176	92,066	1,289
<i>Dublin Electoral Divisions</i>	1,187,176	92,066	1,289
<i>Dublin City</i>	506,211	11,761	4,304
<i>Dublin City North</i>	294,529	7,474	3,941
<i>001 Arran Quay A</i>	1,502	14	10,729
<i>002 Arran Quay B</i>	3,692	72	5,128
<i>003 Arran Quay C</i>	3,714	38	9,774
<i>004 Arran Quay D</i>	3,600	34	10,588
<i>005 Arran Quay E</i>	2,889	26	11,112
<i>009 Ballybough A</i>	3,624	37	9,795
<i>010 Ballybough B</i>	3,215	34	9,456
<i>030 Cabra East A</i>	5,366	141	3,806
<i>031 Cabra East B</i>	3,542	44	8,050
<i>032 Cabra East C</i>	3,352	46	7,287
<i>033 Cabra West A</i>	1,564	49	3,192
<i>034 Cabra West B</i>	2,644	43	6,149
<i>035 Cabra West C</i>	2,865	57	5,026
<i>036 Cabra West D</i>	2,815	60	4,692
<i>066 Inns Quay A</i>	3,715	32	11,609
<i>067 Inns Quay B</i>	3,113	28	11,118
<i>068 Inns Quay C</i>	2,672	28	9,543
<i>073 Mountjoy A</i>	3,760	29	12,966
<i>074 Mountjoy B</i>	3,446	23	14,983
<i>075 North City</i>	3,867	56	6,905
<i>079 Phoenix Park</i>	1,568	739	212
<i>088 Rotunda A</i>	4,672	24	19,467
<i>089 Rotunda B</i>	2,137	21	10,176
<i>144 Royal Exchange A</i>	3,602	44	8,186
<i>145 Royal Exchange B</i>	2,020	22	9,182
<i>152 Ushers A</i>	1,928	71	2,715
<i>153 Ushers B</i>	1,255	26	4,827
<i>154 Ushers C</i>	3,089	38	8,129
<i>155 Ushers D</i>	1,658	14	11,843
<i>156 Ushers E</i>	1,934	21	9,210
<i>157 Ushers F</i>	3,237	50	6,474
<i>161 Wood Quay A</i>	2,743	17	16,135
<i>162 Wood Quay B</i>	3,507	30	11,690

* Area details provided by Ordnance Survey.

Source: Central Statistics Office

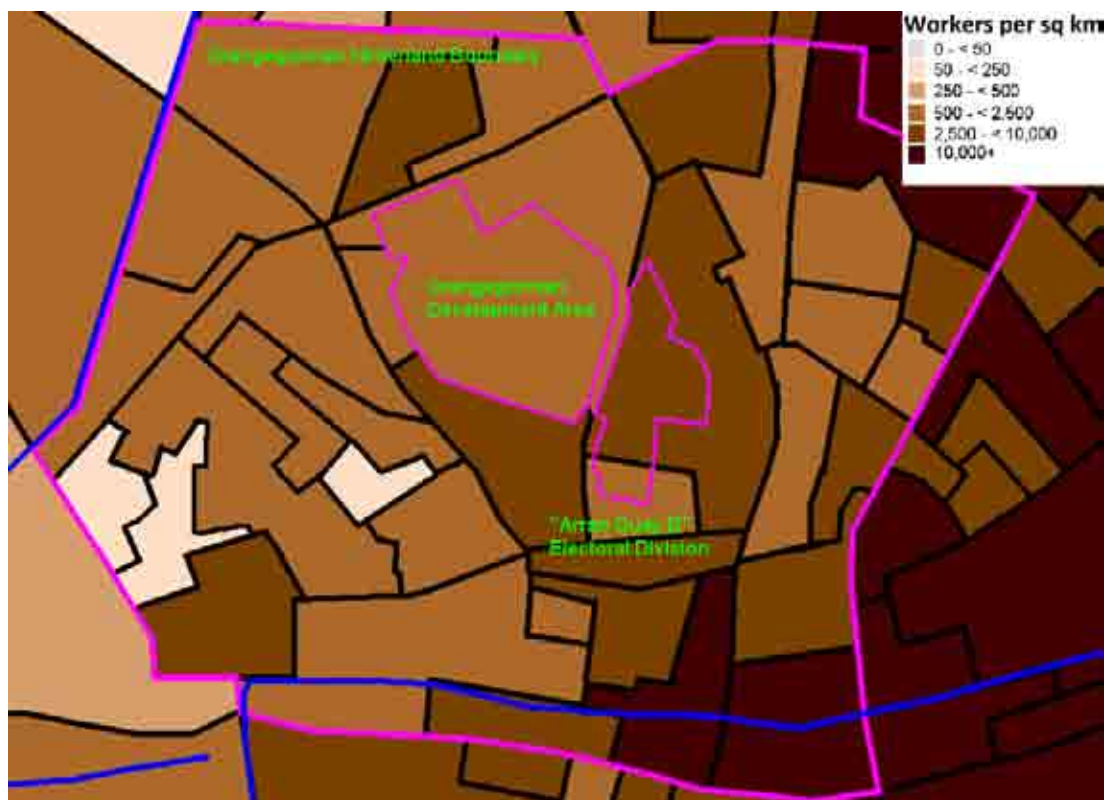
http://www.cso.ie/census/documents/census2006_volume_1_pop_classified_by_area.pdf (Revised)



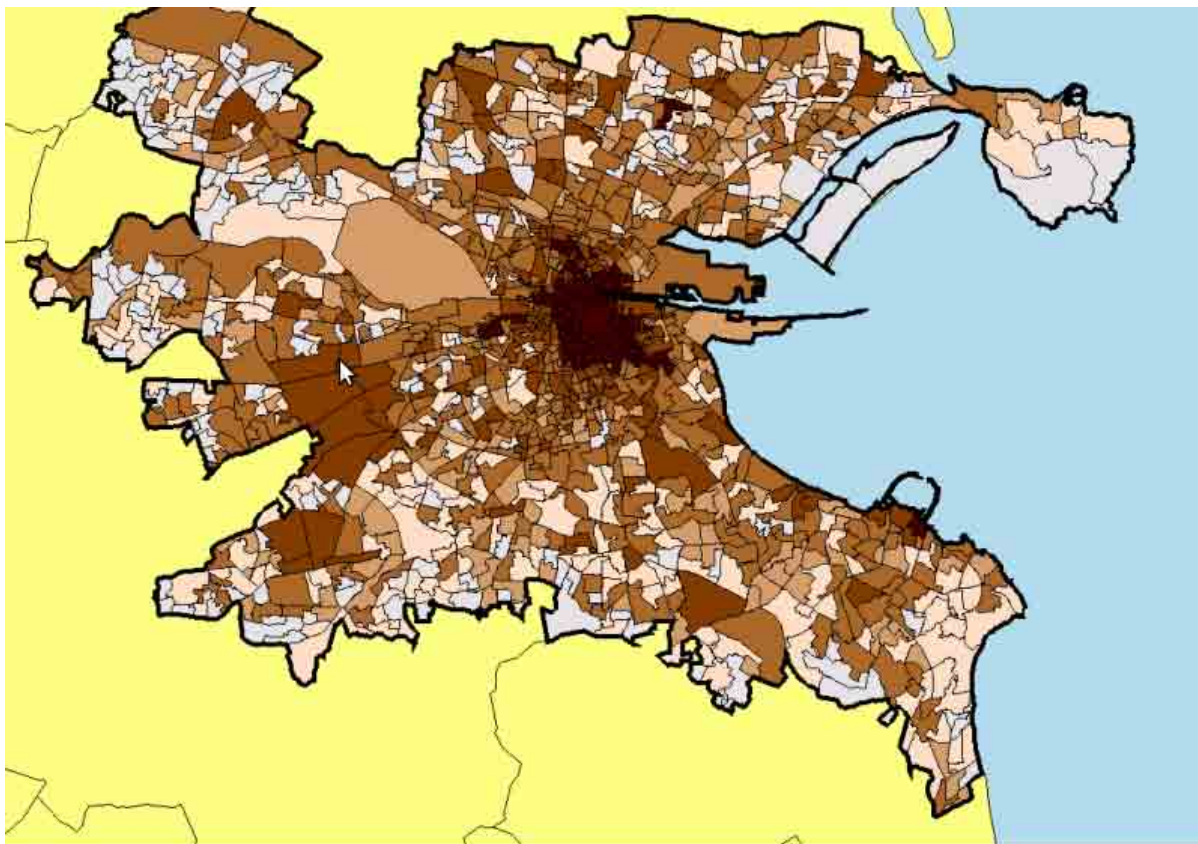
Map: Population density in the Dublin area.

Employment Density

Other than in the Smithfield / Four Courts and Mater Hospital areas, there are few major employers present in the GGN. Lesser employment centres exist at Parkgate Street and Hanlon's Corner (North Circular Road/Prussia Street). The high employment density that exists in Dublin 1 & 2 and to a lesser degree in Dublin 8 is largely absent from the GGN. This is largely due to the residential and low density institutional and transport uses that dominate the area.



Map: Employment density in the Grangegorman area.



Map: Employment Density in the Dublin area. Source: Central Statistics Office

<http://www.cso.ie/census/documents/A%20Profile%20of%20the%20Working%20Population%20of%20Large%20Towns.pdf>

While the Defence Forces formerly had a large number of personnel present, reorganisation and disposal of lands has resulted in a much-reduced presence with personnel moved to McKee Barracks (just outside the GGN) and The Curragh (Kildare). The dominant employments in the GGN are in law, health, transport and local mixed services. Within Grangegorman and Broadstone employment is almost exclusively with Bus Éireann, Dublin Bus and St. Brendan's Hospital. There is a substantial absence of the higher order employments (office, manufacturing, comparison retail, hotels &

restaurants, entertainment, banking & financial services, professional services, public administration, primary health services and third level education) that are present in the central business district with the associated spending power and demand for supporting businesses and employment.

Fundamentally, the GGN performs an inner suburban and not a civic core function. Those employments that do exist, especially those in law and health are likely to draw a disproportionate percentage of their employees from outside the GGN.

Socio-Economic Composition of Population

The population of the GGN includes a variety of vulnerable groups, including working class backgrounds, students, migrant workers, immigrants, the elderly and young families. There is a relative absence of a (resident) middle class and established families. There is a disproportionate percentage of rented dwellings of older stock, much of which doesn't meet modern standards.

In proposing to move DIT to the GGN, there is a risk of the existing balance of residents being upset, with the likely inflow of students and to a lesser degree staff causing unintended economic eviction of existing residents from their current neighbourhoods and dismantling their social supports. There is likely to be a strong shift in the age profile, marital status, household composition, socio-economic status and ethnic make-up of the area. Properties in the area are likely to be under-occupied during non-term times and let to summer students, migrant workers and tourists. Overall there will be a negative effect on an already fragile quality of life in the area, especially if a "big-bang" approach is taken to move the bulk of DIT staff and students to Grangegorman in a single move.

Dublin City Development Plan 2011-2017

The Grangegorman site is primarily zoned Z12 "To ensure the existing environmental amenities are protected in any future use of these lands." with a limited area adjacent to the Park Shopping Centre zoned Z4 "To provide for and improve mixed services facilities". Adjacent zonings include Z1/Z2 (residential), Z5 (central area), Z6 (employment) and Z10a (consolidate inner city). Of note, within the list of Permissible Uses for Z12, it states ".... Education (excluding night-time uses) ...". Unless this is amended, this may impair some proposals for the Grangegorman site.

"15.10.13 Institutional Land (Future Development Potential) – Zone Z12

Land Use Zoning Objective Z12:

To ensure the existing environmental amenities are protected in any future use of these lands.

These are lands no longer in institutional use and could possibly be developed for other uses.

The principles, as set out in section 15.10.11, will apply to any development proposals on these lands, in particular the requirement for 20% public open space. In the Development Plan all references to Z10B zoning will apply to Z12 zoning.

Zoning Objective Z12:

Permissible Uses

ATM, Bed and breakfast, Buildings for the health, safety and welfare of the public, Caravan park/Camp site (holiday), Childcare facility, Community facility, Conference centre, Cultural/recreational building and uses, Education (excluding night-time uses) Embassy, Enterprise centre, Garden centre, Golf course and clubhouse, Guest house, Halting site, Hostel, Hotel, Media recording and general media-associated uses, Medical and related consultants, Open space, Place of public worship, Public service installation, Residential institution, Residential, Restaurant, Science and technology-based industry, Training centre.

Open for Consideration Uses

Boarding kennel, Car park, Civic and amenity/recycling centre, Funeral home, Industry (light), Municipal Golf Course, Nightclub, Office, Outdoor poster advertising, Part off-licence, Shop (neighbourhood)."

Further, the following policies and objectives apply to the Grangegorman area

4.4 POLICIES AND OBJECTIVES

It is the policy of Dublin City Council:

SC1 To consolidate and enhance the inner city by linking the critical mass of existing and emerging clusters and communities such as Docklands, Heuston Quarter, Grangegorman, Digital Hub, Parnell Square, the Ship Street Area and Smithfield with each other and to regeneration areas SC2 To develop the city's character by cherishing

It is an objective of Dublin City Council

SCO3 To implement a series of key urban spaces and pedestrian focussed initiatives as identified in the Legible Dublin Study in the lifetime of this plan (See fig 5) and to incorporate additions to the network as identified in adjacent Plans e.g. Liberties Local Area Plan, Phibsborough Local Area Plan, Grangegorman Masterplan, and the Docklands Masterplan

In addition, Grangegorman / Phibsborough is listed as a "Key Developing Area" and a "Strategic Development and Regeneration Area" (SDRA 8)

"15.10.14 Strategic Development and Regeneration Areas – Zone Z14

Land Use Zoning Objective Z14:

To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and "Z6" would be the predominant uses.

These are areas, including large-scale public housing areas, where proposals for comprehensive development or redevelopment have been, or are in the process of being prepared. These areas also have the capacity for a substantial amount of development in Developing Areas in the inner and

outer city. A number of the Z14 areas relate to public housing important regeneration areas and in the case of each, a number of development principles to guide the development of each area have been identified. These development principles are set out in the Guiding Principles for Strategic Development and Regeneration Areas (See Chapter 16.3).

It should be noted that not all of the identified Strategic Development and Regeneration Areas are zoned Z14 in their entirety. Ballymun has different zoning objectives and uses; the relevant zoning objective for each area shall be applied to any development proposals. Grangegorman is zoned Z12.

These are areas capable of significant mix-use development; therefore, developments must include proposals for additional physical and social infrastructure/facilities.

The development principles, the relevant land use zoning objectives and development standards should be complied with in the making of development proposals.

The following areas have been identified as Strategic Development and Regeneration Areas in the Plan:

*...
SDRA 8. Grangegorman
..."*

The following principals apply to SDRA 8:

"16.3 PRINCIPLES FOR STRATEGIC DEVELOPMENT AND REGENERATION AREAS

This set of guiding principles relates primarily to former strategic Z14 sites and the former strategic Z13 sites which are now combined.

The majority of these sites are important components of the Key Developing Areas set out in the Core Strategy. However, some of the former social regeneration sites do not fall within the Key Developing Areas. However, all of these sites can deliver significant quantum of mixed-uses to create synergies to regenerate their respective areas.

16.3.1 Strategic Development and Regeneration Areas

SDRA 8 Grangegorman/Broadstone

- 1. To ensure that the development framework for Grangegorman/Broadstone provides for a high quality character area/urban district with strong physical linkage to the H.A.R.P. Area/Smithfield, Phibsborough, Manor Street and to the City Centre through Henrietta Street.*
- 2. To create a highly sustainable urban campus at Grangegorman as a new home for Dublin Institute of Technology with the capacity to develop strong links with other knowledge sector engines located elsewhere in the inner city.*
- 3. To develop a legible, attractive spatial and urban character which marries the provision of new urban space with high quality contemporary architecture and with the integration and re-use of protected historic structures and other buildings of architectural/artistic merit.*
- 4. To ensure that the existing open space is developed both for the benefit of the new campus and for adjacent existing communities.*
- 5. To co-operate with existing stakeholders in Broadstone to promote the development of a range of higher value economic uses that would be complementary to the campus uses at Grangegorman*

6. To provide for the physical integration of Grangegorman and Broadstone with each other and the city centre through the development of a series of physical connections including pedestrian and cycle linkages and new transport infrastructure.
7. To ensure that the requirements of the North Area Health Board in the provision of health care facilities shall be accommodated in any future development of Grangegorman.
8. To examine in conjunction with the relevant educational agencies including Educate Together the primary and secondary education uses to support this third level campus.
9. To have regard to the physical integration and regeneration potential of Manor Street/Stoneybatter as important streets / radial routes in the redevelopment proposals for this area.

Given the low level of student accommodation proposed, necessitating high levels of commuting, and in the absence of Luas Line BXD and with only peripheral bus services, it can be considered that the proposed development is not in accordance with principle 2

Additional principles apply:

“16.4.2 KEY DEVELOPMENT PRINCIPLES FOR EACH AREA

7. Grangegorman/ Broadstone (see Draft Grangegorman Masterplan)

- To create a high quality educational campus and healthcare facilities at Grangegorman, with strong linkages to Phibsborough, Manor Street and the City Centre through Henrietta Street.
- **To promote the physical integration of Grangegorman and Broadstone with each other and to the City Centre.**
 - To promote the identity and character of this new educational campus by the location of an elegant mid-rise building towards the centre of the main site on elevated ground overlooking a large open space and the city.
 - To signify the main gateway to the campus by the use of 1 or 2 mid-rise buildings on the proposed main entrance from Constitution Hill/ Broadstone.”

In the proposed Strategic Plan there appears to be no solid proposal to connect to Manor Street (as opposed to Prussia Street). The proposal for a single, pedestrian-only route via Broadstone to the city, cannot be considered as “integrating” Grangegorman and the city centre.

It is normal practice if medium-high density, mid-rise buildings are to be used, these should be located at transport hubs, as not only is there horizontal travel distance to be consider, but also vertical distance. That a mid-rise building is proposed for the centre of the main site conflicts with the fact that it is not a transport hub.

“17.6.1 Areas Identified as Appropriate for High Buildings

Proposals for high buildings will only be considered in each of the areas identified as appropriate for height and must comply with the specified height category for each identified area as follows (see also Fig 21).

...

Areas with Potential for up to 50m

Phibsborough

*Grangegorman **

****Low-rise pending LAP/SDZ/Schematic Masterplan (See 17.6.2 below)”***

“17.6.2 Definition of a High Building

The definition of height for various areas in the Dublin context is as follows – unless otherwise approved in a Local Area Plan or Schematic Masterplan to be agreed by the Local Area Committee.

Category	Area	Storeys Res/Office	Height (m)
<i>Mid – rise</i>	<i>Inner City Phibsborough Grangegorman * Digital Hub</i>	<i>Up to 16 res / Up to 12 office</i>	<i>Up to 50m</i>

(See Guiding Principles for each potential mid to high rise area: Chapter 16.4)

** For the avoidance of doubt;*

- Grangegorman will be treated as a low rise area within the Inner City. No height greater than that specified for the Inner City category will apply until a Local Area Plan or an SDZ is adopted.*
- ...”*

While proposals for a cycle network are in the development plan and are welcome, there is a need for a holistic approach, with appropriate priority, junction treatments, parking provision and where suitable ancillary provision such as bicycle hire, bicycle & accessory sales / repairs and suitable changing facilities.

“APPENDIX 7 STRATEGIC CYCLE NETWORK

Dublin City’s Strategic Cycle Network has been subdivided into an indicative list under the following subdivisions:

- Routes outside inner city (Suburban)*
- Inner-city cycle routes*
- Recreational routes*
- Quality Bus Corridor/cycle routes and Quality Bus Network (QBN) routes*

The following indicative list includes routes which will not be implemented within the life of the Plan, existing routes, proposed routes, and routes under construction. In some cases e.g. where significant traffic calming measures have been implemented or are proposed cycle routes may be signposted rather than marked. In other cases e.g. along important routes where insufficient widths for cycle tracks exists, safety/accessibility improvements will be incorporated wherever feasible. Existing routes have been included as in many cases they will be upgraded during the lifetime of the Plan. Investigation of lower speed limits on some routes will take place to reduce speed differential between cyclists.

Section A: Routes outside Inner City (Suburban)

...

Northside

...

- Phibsborough Road, Connaught Street, St Peter's Road, part of Faussagh Road and part of St. Eithne Road*

...

- North Circular Road onto Cabra Road, and will then connect with the Old Cabra Road.*

...

Rathdown Road, Grangegorman Upper & Lower, Brunswick St,

...

Section B: Inner City Cycle Routes

All cycle routes in the inner city, generally not associated with QBCs or QBN, are listed under this heading 'Inner City Cycle Routes'

Primary Priority (not in priority order)

...

- *Phibsborough Road - Chancery Place*

...

- *North Circular Road*

Secondary Priority (not in priority order)

...

- *Grangegorman - Queen Street*

Existing /Under Construction/Design Stage

...

- *Old Cabra Road – Prussia Street - Manor Street – Stoneybatter - Blackhall Place*

...

- *North King Street - Bolton Street*
- *Capel Street Bolton Street to Parnell Street"*

While these routes provide a basis for a network within the GGN, there are no firm proposals for a network within the GGDA. Importantly, there is clarity as to whether pedestrian and vehicular routes will permit or be suitable for cycle use.

Existing DIT Campus Advantages and Disadvantages

The DIT is currently spread across approximately 30-40 buildings in four main clusters, primarily in the city centre and Rathmines and the effect of any one building or cluster is diluted. This has the advantage of spreading transport, housing and other service demands across much of the city. Being located in the city centre and along major transport routes means that students and staff can live in diverse locations, with Ranelagh, Rathmines, South Circular Road and Cork Street areas being popular with Kevin Street and Aungier Street members of the college community and Smithfield, Phibsborough, Drumcondra and other parts of the north inner suburbs being popular with Bolton Street and Cathal Brugha Street members of the college community. However, DIT provides education to residents of the entire Dublin region and in the case of some courses nationally, with many students commuting long distance to study.

The advantages of having diverse campuses include:

- The effect of the college is spread across a larger part of the city, with the demand of ancillary services spread across a larger area, e.g. the transport system isn't overloaded by delivering all staff and students to a single point within the city within a narrow time frame.
- Any incident of disruption, e.g. a power cut, fire or severe traffic disruption is unlikely to affect more than a portion of activities across DIT.
- Knowledge of DIT is spread to a wider part of the population, including inner city residents who

may not otherwise attend.

The disadvantages of having diverse campuses include:

- Higher cost of support services including administration, maintenance, security, catering.
- Lower ability to provide niche modules in study courses. There is little difference in the cost between proving a lecture to 30 or 300 students, other than size of lecture space. However, in any one campus, there may not be demand from 300 students for that module and it may not be economic or practical to repeat niche modules across each campus.
- Lower ability to provide niche ancillary services, e.g. providing a full-time student medical service with a range of specialists (dental, mental health, physiotherapy) is more practical with a larger student body in a single location.
- Absence or loss of collective identity and possibly prestige.
- The cross-fertilisation of ideas is impaired.

Understanding of the Proposed Development

It is understood that the main objectives of the development are to provide for a substantial expansion of DIT, especially in the provision of post-graduate and enterprise services, while providing the HSE with the ability to deliver modern mental health and primary care facilities. While there will be a net capital cost to the exchequer, this is necessary to provide for updated and expanded services. It is expected that there will be savings in current costs in administration, maintenance, security, etc. and the potential for enhanced quality of services delivered. Ancillary services including catering, retail, student accommodation, sport facilities and other student services will also be provided.

It is understood that the HSE (two tranches) and DIT (two tranches) facilities will each be provided in a number of phases, with each tranche delivered in a number of separate, but parallel packages. The HSE and DIT sites have space for planned and expected expansion. Such expansion may take place within the first-built building clusters and not at the perimeter. Non-DIT / non-HSE facilities are expected to include a primary school, a public library and a performing space.

While a number of infrastructure projects will take place within the GGDA and surrounding streets, including internal roads, electricity, gas, water and drainage, it would appear that any transport improvements are outside the scope of the development and will be delivered on an ad-hoc basis by third parties to points on the perimeter of the site. While Luas Line BXD and the existing bus depots at Broadstone provide potential for high quality transport, no specific proposals are brought forward in the Strategic Plan.

Problems with the Proposed Development

Phasing

It is proposed to develop the HSE and DIT portions of the site in two large tranches each. This is likely to require a larger temporary construction workforce and more frequent deliveries than would be the case where more gradually phasing would be involved, with a consequent impact on neighbouring areas.

Land use

The existing site use at Grangegorman puts very little pressure on the area. The proposal is to radically change the land use in the GGDA, which will also have an effect on the GGN. This will result in existing infrastructure and social structures, which are already at capacity, being put under further strain.

The main difficulty is the preponderance of daytime uses by commuters, which will result in strong tidal flows, predominantly in the morning and evening peaks. While some of this commuting will be against the peak flow, others will be cross-city, thereby straining peak services.

Transport / Access

The existing transport network is historic in nature, congested and unable to handle the burdens proposed for it without substantial change. Given that the network is primarily of two lane roads, it is susceptible to disruption through congestion, road works, breakdown or other cause. The proposals make no provision for improving the access routes to the site, despite placing a substantial burden on them.

Related to land use, a change to provide additional night-time uses, e.g. increased student or other housing (and the possible retention of some of the existing DIT campuses away from the Grangegorman site), providing additional social or recreational opportunities would make these flows more sustainable.

The likely absence of Luas Line BXD and the lack of provision of a central passenger transport hub or axis within the GGDA are the greatest transport weaknesses in the development.

Characteristics of Desirable Transport System

On the table (below) a variety of characteristics of a desirable transport system are shown. While the table is orientated towards a macro transport system, e.g. a railway system, many of the same principles also apply to micro transport system, e.g. pedestrian walkways on a single site.

Category	Description	Grangegorman performance
<i>Affordability</i>	<i>The cost of providing transit access is greatly affected by the need for pedestrian bridges, underpasses, and other significant infrastructure</i>	<i>Good – close to city centre, good public transport potential.</i>
<i>Aesthetics</i>	<i>The aesthetics of the pedestrian access area encompasses the attractiveness of the walkway, the street furniture, and the congruence between street design and local architecture.</i>	<i>Potentially good – modern buildings and routes built within a consistent masterplan.</i>
<i>Comfort</i>	<i>Issues of “comfort” include steepness of inclines, weather protection, condition of walking surface, and protection from noise and air pollution.</i>	<i>Mixed – the campus will have a variety of individual buildings with no covered access</i>
<i>Directness and connectivity</i>	<i>“Directness” involves a pedestrian path that minimises the distance travelled to access the transit station. Connectivity refers to the ability of pedestrians to readily access a broader network of destinations.</i>	<i>Poor – large block size, erratic building shape, lack of a transport hub or axis</i>
<i>Legibility</i>	<i>The legibility of an area refers to the ease in understanding the street environment. The availability of maps and signage can help legibility.</i>	<i>Poor – identical building style, erratic building shape, limited sight lines due to curved streets</i>
<i>Safety</i>	<i>A “safe” pedestrian pathway implies that pedestrians are well protected from road hazards such as vehicles.</i>	<i>Very good – pedestrians are for the most part separated from vehicular traffic</i>
<i>Security</i>	<i>“Security” refers to providing an environment where pedestrians are not susceptible to robberies or other crimes.</i>	<i>Average – there is no particular reason to believe that the site will be any safer or less safe than any other.</i>

These qualities are not necessarily always mutually compatible.

Table: Extract from “Evaluation Framework For Transit Access” (Safe routes to transit in developing cities - Michael King / Lloyd Wright) – note that the right hand column is not included in the original.

Additional factors, not addressed by King & Lloyd, include:

Category	Description	Grangegorman performance
Accessibility	That all members of society are capable to accessing both the site and individual buildings. This includes people with disabilities, the elderly, people caring for young children and those with luggage or sports equipment. Dublin Bus estimates 25% of their passengers have some mobility impairment.	Poor (site) – the lack of a transport hub or axis on site makes access more difficult for all. Average (buildings) – assuming modern building standards are implemented, there is no reason to expect buildings to be any more or less accessible than others.
Certainty	That any particular journey is of a reasonably determinable in duration, effort and cost and not subject to disruption and in the event of disruption, a variety of desirable alternatives should be available.	Poor – there is a risk of delays due to the constricted nature of the surrounding roads, resulting in potential delays. As there is no transport hub or axis, there is less availability of alternative transport services, e.g. there is no focal point available that would warrant a taxi rank and no location with a variety of bus routes.
Convenience	That the system is readily accessible with a minimum of fuss, planning or preparation	Poor – access to public transport will require substantial walks
Attractiveness (visually / socially) and active frontages	Attractive routes, with sufficient line of sight, lighting and suitable hard and soft landscaping, with activity inside and outside frontages are more likely to be used than those that are less visually attractive or lack activity or passive supervision	Average - assuming modern building standards are implemented, there is no reason to expect buildings to be any more or less attractive than others. However, masterplan-based sites risk monotony and under-active frontages / locations.
Locally distinctive	A factor of legibility is the provision of distinctive features in each area, so as to aid navigation, identity and description, e.g. the tall blue building	Poor – there is a risk that all the buildings will look similar, making it difficult to distinguish one’s exact location.

A number of these points are addressed below.

Legibility

Legibility of routes refers to the ability of a person to determine their starting point, finishing point and to instinctively determine the most appropriate route and any intermediate landmarks. This is especially important to new users and in situations where there are route disruptions, e.g. a diversion due to road works. The proposed campus layout, with curving and zig-zag streets renders potential routes less legible than they would otherwise be. In designing individual routes and buildings, appropriate attention needs to be given to identifying locality, e.g. by the use of major landmarks or a common theme amongst buildings and precise location, e.g. by using unique building names and numbers.

While way-finding systems assist users in determining a route, they are often designed by those who are already familiar with the area and fail to appreciate the needs of the new user. One example of this is already present, even before the development has started on the ground is the similarity between the name St. Brendan's Hospital and the suggested name of Brendan Behan Way for the main route through the site. Such similarities are inappropriate and likely to cause confusion, for both the new user and the less aware and result in such corruptions as "St. Brendan Behan" and "St. Brendan's Way". This in a city that already has an identified problem with many name corruptions and the repeated use of similar names e.g. there are four streets called "Liffey Street" (Liffey Street Upper, Liffey Street Lower (both at Abbey Street), Liffey Street West (Collins Barracks) and Liffey Street South (between Kilmainham and Chapelizod)).

Similarly, the often absent route direction and street name signs and "directions by pub" nature of travel in Ireland, especially Dublin, is particularly difficult for new users.

Directness of routes

Directness of route has a strong bearing on overall journey time. The current large block sizes prevent this in many cases. It is important that the strategic routes in the GGN and local routes in the GGDA are designed such that users can travel between their points of origin and destination as directly as possible, taking into account intervening buildings, sports grounds and private property. This needs to take into account that certain routes may not be available at all times or on all days, e.g. if the King's Inns grounds are closed, access to the Bolton Street campus is less direct. Similarly, not all routes within the campus may be available at all times, e.g. routes across the playing fields may be closed at night, but it might be possible to provide exit only gates.

Total journey time on any given route and certainty

Two main factors are important to users on a route - average journey time and the certainty of that journey time. Average journey time will need to take into account distance, travel speed, normal delays at crossing points & congested areas and typical waiting times for public transport.

Certainty of that journey time is largely determined by the presence or absence of congested areas, typical occupancy levels and the availability of alternative routes or other recovery strategy and may be affected by frequency of public transport. For example, many people are unwilling to rely on a slow, low frequency train service on a single-track route that has many level crossings, especially if that system is overcrowded and there are no alternative routes. There are simply too many things that can go wrong and a low possibility of recovery. While such an example is extreme and the specifics don't apply in the Grangegorman case, if the development relies on existing bus routes to provide the bulk of its transport, difficulties may arise. A single vehicle breaking down or an accident, fire or other congestion can close any of Stoneybatter, NCR or Phibsborough Road to all but a trickle of traffic and it would be difficult to recover promptly from the situation as there are few or no suitable alternative routes. While there are three potential access routes, each is beyond the perimeter of the GGDAA and each fails to deliver users to the core of the campus.

Safety & security and attractiveness

It will be important to ensure that internal routes and access to external transport are designed in such a way that un-trafficked spaces and loiter-spots that lack passive supervision are avoided. As the campus will be somewhat open, there is an inability to close off much of the campus during the night. This may permit anti-social behaviour and the risk of more serious crime.

While the use of primarily pedestrian routes through the campus reduces the risk of traffic injuries, appropriate means will be required for crossing the adjacent streets, many of which are busy with traffic. In particular, a combined pedestrian-Luas bridge across Phibsborough road at Broadstone should be investigated.

Alternative Transport Options

Avoiding commuting

It would be useful for the student accommodation element of the development to be expanded, such that a larger proportion of the college community lives on or near the campus. This can be achieved through a shift in the allocation of space within the campus towards student residences from either education or from the reserved expansion space. If necessary, the Bolton Street/Linenhall campus could be retained.

In particular, there should be sufficient accommodation to allow all first year and international students the option to live on campus. While there typically won't be full up-take from these groups, the balance of the accommodation can be used by other students. It would be useful for the residences to account for more than the typical 17-23 year old, single student and provide an appropriate proportion of bed spaces suited to couples, young families, mature students and those with disabilities (using broad criteria) or mobility issues. It would be important to strike a balance between providing for those groups and not ghettoising them.

With these measures, not only would there be a reduction in commuting to and from Grangegorman, but the allocation to car parking could be revised as there would be an overall reduced demand.

Walking and cycling

As an alternative to on-site accommodation, satellite residences could be provided within walking or cycling distance of the campus, similar to the Trinity Hall residences in Dartry used by Trinity College. Trinity Hall has ready access to the main TCD campus via the almost door-to-door Dublin Bus route 128 and to a lesser degree the Luas Green Line. Trinity College has sought expressions of interests from developers for similar such residences. For Grangegorman, potential sites are at the former railway sidings at Cabra Road, McKee Barracks or other former Department of Defence properties, Broadstone, or a variety of infill sites in Cabra, Phibsborough, Smithfield, Heuston Station or indeed in certain current DIT properties, subject to them being suited to conversion.

However, it is fundamentally important that the current fractured road network in the GGN be improved in the creation of the Grangegorman development. The current block size of the Grangegorman and Broadstone sites is unprecedented in the city centre, comparable only to the Royal Hospital Kilmainham and the railway yard at Heuston station, both of which typically have low demand for pedestrian or vehicular access (while Heuston station has car parking, a majority of rail passengers arrive or depart by public transport which is focused on the station concourse). It is important that both members of the college community and the residents of the GGN benefit from these improvements. The most important factors are given in section 5.0.

Both DIT and the residents of the GGN (some of which will be members of the college community) need access through each other's areas. Access through the DIT lands will provide the residents of Stoneybatter with better access to the HSE development on the NCR and from Prussia Street / Aughrim Street to Phibsborough Road / Parnell Square areas. Access through currently privately owned, third party lands would improve the directness of trips from parts of the GGDA to Hanlon's Corner, Smithfield (including the Luas stop), similar to the proposed access via Broadstone. However, while a route is indicated from Blessington Street Basin to the vicinity of Marne Villas, no indication is given as to how this will be achieved through the working bus depot.

Importantly from DIT's perspective, such access improvements could considerably improve both service vehicle and public transport possibilities.

Public Transport

It is likely that that in the absence of Luas Line BXD, that the site will rely, primarily on bus services to provide public transport. Even if Metro North and the DART Underground proceed, both they and the existing Luas Red Line will be too remote from the Grangegorman site and commuters will need to rely on interchange in the majority of cases. Travel distances to major transport hubs are too long to walk, but longer than would create economic bus services.

In comparison, the main TCD campus (and outlying buildings from College Green to Grand Canal Dock) can avail of approximately:

- 100 bus city routes,
- The full range of Bus Éireann regional and long-distance buses from Busáras and private operators
- Three existing train stations (Grand Canal Dock, Pearse and Tara Street) on the DART line,
- Two stops on the Luas Red Line (Abbey Street and Spencer Dock),
- St. Stephen's Green stop on the Luas Green Line and
- Connections from the main railways termini at Heuston, Connolly and Docklands Stations.

If Metro North and the DART Underground proceed, TCD will be able to benefit at stops at O'Connell Bridge, St. Stephen's Green and Pearse.

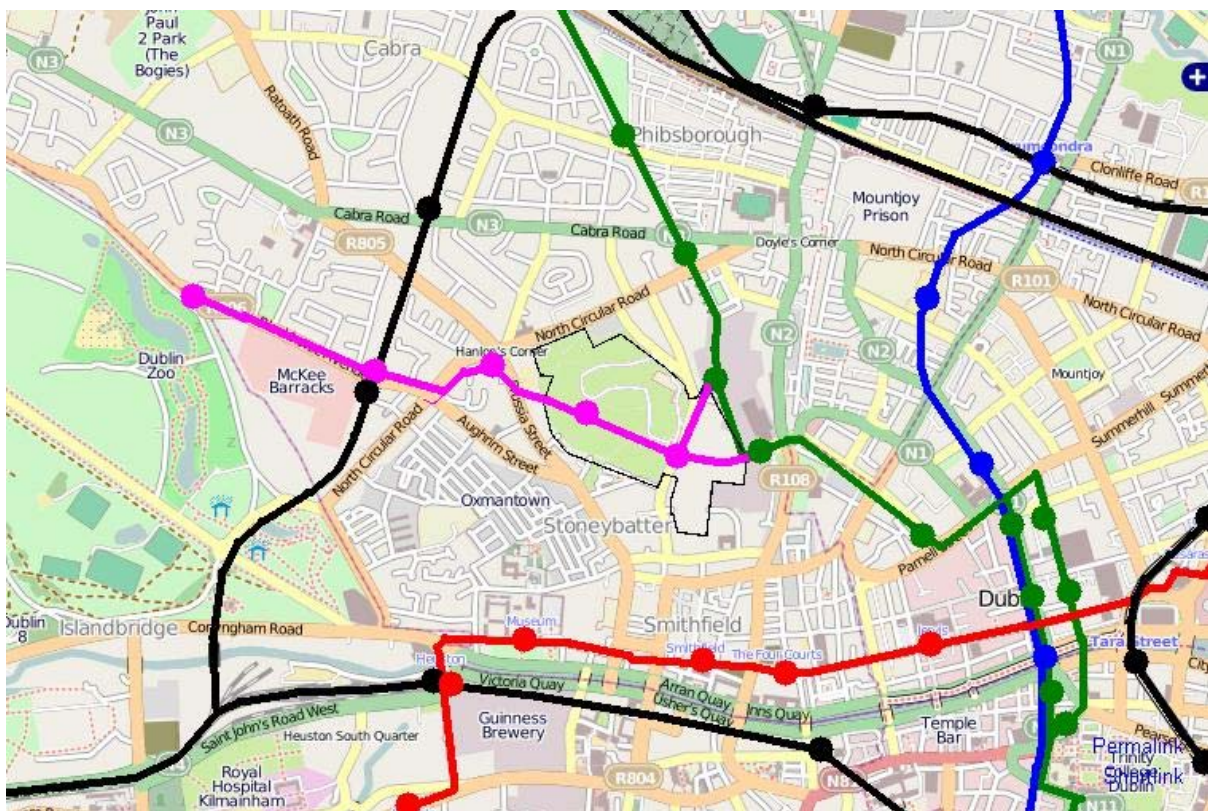
In the case of UCD and DCU, both can draw on established student neighbourhoods*, with a suitable range of accommodation and services within walking distance and existing substantial bus services (and DART / Luas in the case of UCD). Nevertheless, both are under severe pressure from car commuting and parking, something that the Grangegorman site cannot absorb.

* These neighbourhoods have evolved over decades, in contrast with the “big bang” proposal for Grangegorman.

Internal Transport

It would be useful to design routes such that they provide direct access to the core of the campus and that the core would contain the busiest building uses, e.g. lecture theatres, public offices, restaurants and retail services and that lower priority be assigned to private offices, stores, workshops and other low density uses. Notably the current core is focused on the lowest intensity use on site – the playing fields.

It may be useful to provide public transport services along either the main axis to the site or along the service road. This could deliver commuters directly to the campus core, without the need for an extended walk and would dramatically improve access for those with mobility impairments. Further, as this route would be uncongested, it would substantially reduce travel times and deliver a service on par with a bus rapid transit service. An alternative would be to extend Luas Line BXD west through the site as far as the Park Shopping or even further west to McKee Barracks.



Map: Alternative Luas option – Potential westward extension of Luas Line BXD through Grangegorman (pink), Luas Green Line and BXD (green), Luas Red Line (red), Metro North (blue), Irish Rail including DART Underground (black). Base mapping openstreetmap.org This map may be shared under the Creative Commons Attribution-ShareAlike 2.0 licence.

Of the issues raised by King & Lloyd (expanded list at 5.0 above), there would be a substantial improvement for the following categories:

- Comfort,
- Directness and connectivity,
- Legibility,
- Safety,
- Security,
- Accessibility,
- Certainty,
- Convenience,
- Attractiveness (visually / socially) and active frontages,
- Locally distinctive.

There may be a more modest improvement in Affordability / value for money and a possible modest negative effect on Aesthetics – there may be a tram or bus passing along the main axis every few minutes or alternatively if the services road is used, this may not be as visually attractive as the main axis. However, overall there would be a substantial improvement in service both to the members of the college community and those availing of the public transport options that pass the campus. In removing some bus routes from Cabra Road and Prussia Street / Manor Street / Stoneybatter, service speed could be dramatically improved, with those time savings reinvested in a better, more frequent service, including local services if appropriate, e.g. a service that connects Grangegorman to Heuston Station or other parts of the south west inner city without travelling via the city centre or the extension of some routes that currently terminate in the city centre to Grangegorman.

Construction Traffic

An appropriate site traffic management plan (STMP) will be required to manage construction deliveries, work vehicles and the parking of personal vehicles by contractor's staff. It would be useful to make it mandatory for all contractors to provide season (weekly, monthly, annual) tickets to staff and to ensure that staff use them and to take the maximum possible measures to prevent commuter parking in residential areas.

As certain works (primarily services connections) will extend onto the public road, it will be necessary to manage these works carefully, to minimise the impact on traffic and residents.

Most of the potential expansion sites are within clusters of buildings that will be built in the early phases. This would appear to be contrary to good planning as it increases disruption to existing building users and makes access more difficult, reducing design options and increasing costs

Conclusion

The historic and existing land uses in the Grangegorman Neighbourhood have been predominantly of a low impact nature, with self-contained institutional, government transport and residential uses and a relative absence of interaction with the surrounding city and a lack of high order land uses.

The transport systems in the Grangegorman Neighbourhood never developed as well as those in the Dublin 1, 2 & 8 areas and are designed primarily for through traffic and are underdeveloped with regard to delivering commuters to the Grangegorman Development Agency Area. There is no firm proposal in the Strategic Plan to improve these systems. In addition, other economic support infrastructure never developed as well as those in the Dublin 1, 2 & 8 areas as there was a low employment density in the Grangegorman Neighbourhood and those employments that did exist were largely self contained.

The cumulative effect of a single campus in Grangegorman will be much greater than the dispersed effect of the existing campuses.

The Strategic Plan requires:

- Revision and correction to deal with over-stated & incorrect assertions and situations where developments outside the Grangegorman Development Agency Area have been clarified, e.g. Luas Line BXD routing via Dominick Street Upper & Lower.
- Fewer aspirational statements and greater specification of the development, including indicative building footprints and heights, finishes, etc.
- Reconciliation with the Dublin City Council Development Plan 2011-2017.
- Greater detail on communication between buildings and the way they each interact within the site.
- Greater detail on internal cycling routes.
- Possible reallocation of space between accommodation, academic and office uses.
- Revision of the transport strategy, so as to deliver commuters to the core of the site, using a high quality transport facility, in line with the agency's statutory obligations.
- Revision to consider a transport hub or axis through the site.
- Consideration as to whether Luas Line BXD, as proposed, could be revised to provide a stop closer to the centre of the campus, e.g. in the vicinity of the clock tower.

In conclusion, the Strategic Plan as proposed is deficient and needs revision.

Glossary

Note on names: The current, popular names are generally used. The legal, formal and/or historical names may be different.

CIÉ	Córas Iompair Éireann, the owner of Dublin Bus, Bus Éireann, Irish Rail and the Broadstone bus depots. CIÉ provides central services to its subsidiaries including administration, property, pensions and associated services.
DART	Dublin Area Rapid Transit. The existing electrified railway from Greystones to Howth / Malahide.
DART Underground	The expansion of the DART system with the electrification of the Northern (to Drogheda), Maynooth and Kildare lines (to Hazelhatch initially) and the construction of the Interconnector tunnel from the Docklands to Inchicore.
DIT	Dublin Institute of Technology
Network Direct	Dublin Bus programme to revise the city's bus network with consolidated routes
ED	Electoral Division
GGDAA	Grangegorman Development Agency Area
GGN	Grangegorman Neighbourhood
GSWR	Great Southern & Western Railway
Hanlon's Corner	The junction of North Circular Road and Prussia Street
HSE	The Health Service Executive. The agency charged with the delivery of health services in Ireland and the former owner of the Grangegorman site.
Luas Line BXD	This is the proposed extension of the existing Luas Green Line from St. Stephen's Green along the O'Connell Street axis to Broadstone and along the former railway line to Liffey Junction and Broombridge.
Metro North	The proposed underground railway from St. Stephen's Green along the O'Connell Street axis to the airport and Swords
MGWR	Midland Great Western Railway

Yours sincerely

Pirooz Daneshmandi
Chairperson
Grangegorman Residents Alliance (GRÁ)
3 Marne Villas
Rathdown Road
Dublin 7

Environmental Protection Agency

Grangegorman Development Agency Draft Strategic Plan SCP091001.2 EPA Submission 07.12.2010 1

Grangegorman Development Agency

St. Brendan's Hospital

(Former Nurses Education Centre)

Grangegorman

Dublin 7

7th December 2010 Our Ref: SCP091001.2

Re: Grangegorman Development Agency Draft Strategic Plan and SEA Environmental Report - EPA submission

Dear Sir/ Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 5th November 2010, regarding the above. Please find attached the Environmental Protection Agency's submission in relation to the Grangegorman Development Agency Draft Strategic Plan, the Plan and SEA Environmental Report.

We refer you to Annex 1 of Directive 2001/42/EC (SEA Directive) and Schedule 2B of European Communities of S.I. No. 436 of 2004- Planning and Development (Strategic Environmental Assessment) Regulations, 2004, the SEA Regulations, for "Information to be contained in an Environmental Report".

The EPA is a statutory environmental authority under the SEA Regulations. In its function as a statutory SEA environmental authority, the EPA does not approve the Plan. The main purpose of this submission is to promote the full integration of the key findings (mitigation measures and recommendations) set out in the SEA ER, in a transparent manner in the Plan. Suggestions are put forward for consideration with a view to addressing the integration of a number of additional environmental considerations within the Plan.

The Plan reflects a proactive and positive approach towards integrating environmental considerations and promoting the principles of sustainable development. The delivery of the Policies and Objectives set out in the Plan will be dependent on the full implementation of the challenging and proactive aims and objectives set out in the Plan.

In assessing the likely significant effects of the Plan, the full range of effects, as set out in Annex I of the SEA Directive - "secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative effects", should be assessed and reported. In particular, the potential for cumulative effects in combination with other relevant, Plans, Programmes and projects within and adjoining the Plan area should be assessed. Grangegorman Development Agency Draft Strategic Plan SCP091001.2 EPA Submission 07.12.2010 2

The *Mitigation Measures* and *Monitoring proposals* in the SEA ER should be linked with the relevant *Key Significant Environmental Issues* identified in the *Baseline Data and Environmental Issues Chapter* of the SEA ER. The Plan implementation monitoring should also be linked with the relevant aspects of the SEA related monitoring.

Amendments to the Draft Plan

You are reminded that it is a matter for the Competent Authority to determine whether or not the implementation of any proposed amendments to the Draft Strategic Plan likely to arise from consultation would be likely to have significant effects on the environment.

This assessment should take account of the SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004) and should be subject to the same method of assessment as undertaken in the “environmental assessment” of the Plan. Screening should also be undertaken of any proposed amendments, for Habitats Directive Assessment requirements where appropriate.

SEA Statement

You are also referred to the requirement to prepare an *SEA Statement* outlining “*Information on the Decision*” as required by the SEA Regulations. This should summarise the following:

How environmental considerations have been integrated in the Plan;

How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;

The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,

The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact Tadhg O’Mahony - SEA Section EPA- t.omahony@epa.ie.

Yours sincerely

Tadhg O’Mahony
Senior Scientific Officer
SEA Section -Office of Environmental Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

Grangegorman Development Agency EPA Submission 07.12.2010 Draft Strategic Plan and Environmental Report 1 of 19

Grangegorman Development Agency Draft Strategic Plan 2010 Strategic Environmental Assessment (SEA) Environmental Report Environmental Protection Agency Submission 7th of December 2010 SECTION 1: INTEGRATION OF ENVIRONMENTAL CONSIDERATIONS IN THE LAND USE PLANS

The comments below relate to the integration of the environmental considerations and recommendations that have been set out in the Environmental Report(ER), as well as the additional information highlighted by the EPA, within the Strategic Plan. Suggestions are put forward for consideration with a view to addressing the integration of a number of key environmental considerations within the Plan.

The EPA is a statutory Environmental Authority under the SEA Regulations. The EPA’s role in SEA in relation to Land Use Plans focuses on promoting full integration of the findings of the Environmental Assessment into the Plan. It is not the function of the EPA to either approve or enforce Land Use Plans.

The *Mitigation Measures* and *Monitoring proposals* in the SEA ER should be linked with the relevant *Key Significant Environmental Issues* identified in the *Baseline Data and Environmental Issues* Chapter of the SEA ER. The Plan implementation monitoring should also be linked with the relevant aspects of the SEA related monitoring.

1 WATER

1.1 Water Framework Directive

The Plan should promote the protection of water resources and associated habitats and species. Provisions should be made in the Plan for the incorporation of the specific relevant objectives and measures for individual water bodies set out in the relevant River Basin Management Plan (RBMP) and associated Programme of Measures (POM). The Plan should not hinder, and where possible promote the achievement of these specific objectives at water body level. In addition the plan should outline the current water quality status and the status to be achieved by 2015 in any receiving waters covered by the plan.

You are in particular referred to the Water Maps GIS Tool within this weblink:

<http://www.wfdireland.ie/maps.html>

You are also referred to the full range of Protected Areas within each of the River Basin Districts (RBDs) as set out in Annex IV 1(i) – (v) inclusive of the Water Framework Directive. These should be taken into account in the drafting of the Plan.

The Plan should refer to and incorporate the recent Surface Water legislation „*Environmental Objectives (Surface Waters) Regulations 2009*“ 2009 (S.I. No 272 of 2009), where relevant and appropriate. You are referred to the Legislation at:

<http://www.environ.ie/en/Environment/Water/WaterQuality/EnvironmentalObjectivesSurfaceWatersRegulations2009/>

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The Plan should refer to the recent „*Water Quality in Ireland 2007 – 2008, Key Indicators of the Aquatic Environment*“ (EPA, 2009) as appropriate and relevant. You are referred to the Report at: <http://www.epa.ie/downloads/pubs/water/waterqua/>

1.2 Drinking Water/Water Supply

The SEA and Plan making processes should address drinking water supply capacity, **conservation and leakage** (in particular) and quality in the Plan area. Future predicted increases in population and demand should be taken into consideration in the context of current drinking water supply and future requirements.

The Plan should implement the European Communities (Drinking Water)(No.2) Regulations 2007 and should implement and include, as appropriate, the relevant recommendations set out in *The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007-2008, (Office of Environment Enforcement- EPA, 2009)*. You are referred to this Report at:

<http://www.epa.ie/downloads/pubs/water/drinking/>

The Plan should refer to the EPA guidance handbook on the *Implementation of the Regulations for Water Services Authorities for Public Water Supplies* that has been prepared under the European Communities (Drinking Water) (No.2) Regulations 2007. This guidance is available at <http://www.epa.ie/downloads/pubs/water/drinking/>. It contains guidance for local authorities on the implementation of the Drinking Water Regulations, including statutory and binding guidance on certain issues as is required under the Regulations.

The Plan should include, where applicable, specific objectives for the improvement of any water supplies in the Plan area, in particular the Plan should address the specific objectives to be achieved where these water supplies are included on the EPA’s Remedial Action List. This list can be found at:

<http://www.epa.ie/downloads/data/water/>. Guidance has also been published by the EPA on the Remedial Action List and is available in the Drinking Water Handbook mentioned above at

<http://www.epa.ie/downloads/pubs/water/drinking/>.

The EPA has also published a series of Drinking Water Advice Notes, which cover the following areas:

- Advice Note No. 1: Lead Compliance Monitoring and Surveys
- Advice Note No. 2: Action programmes to restore the quality of drinking water impacted by lead pipes and lead plumbing
- Advice Note No. 3: E.coli in Drinking Water
- Advice Note No. 4: Disinfection By-Products in Drinking Water
- Advice Note No. 5: Turbidity in Drinking Water
- Advice Note No. 6: Restoring Public Water Supplies Affected by Flooding

These can be found at: <http://www.epa.ie/downloads/pubs/water/drinking/>

These Advice Notes set out EPA guidance on the actions that are necessary following exceedances of these parameters and also the preventative measures that should be taken to improve the security of the supply to prevent a repeat failure in the future. This is provided in the context of the EPA recommended approach to managing a drinking water supply i.e. the Water Safety Plan Approach. Please be aware that EPA Lead Guidance Circulars No.s 1 and 2 have been reissued as Advice Notes No.s 1 and 2 though there has been no change to the text of these documents. **Grangegorman**

As set out in the recommendations referred to above, the Local Authority must develop appropriate solutions that may involve abandoning or replacing drinking water sources, upgrading the treatment facilities or improving management and operational practices.

The Plan should take account of any Groundwater Protection Schemes and Groundwater Source Protection Zones data available at the Geological Survey of Ireland: <http://www.gsi.ie>

1.3 Waste Water Treatment

Where the introduction of additional lands for development is being proposed within the Plan area, relevant Policies/objectives should be included in the Plan, and as appropriate, to promote assessment of the adequacy of the existing wastewater treatment facility (ies) in terms of both capacity and performance and the potential risk to human health and water quality. Where relevant, the potential impact on habitats and species of ecological importance should be addressed.

The Plan should include as appropriate measures to ensure that trade effluent in the area covered by the Plan is managed properly and discharged to sewer in accordance with relevant discharge licences where appropriate.

1.4 Groundwater Protection

The Plan should include clear Policy and Objective for the protection of groundwater resources and associated habitats and species. The Plan should make reference to the requirements of the Groundwater Directive (2006/118/EC) on the protection of groundwater against pollution and deterioration, which came into force on the 12th December 2006.

This Directive addresses the main elements of groundwater protection as required by Article 17 of the WFD. It establishes underground water quality standards and introduces measures to prevent or limit inputs of pollutants into groundwater. You are referred to the following recent legislation *European Communities Environmental Objectives (Groundwater) Regulations 2010* (S.I.9 of 2010) at:

<http://www.environ.ie/en/Environment/Water/WaterQuality/GroundwaterRegulations2010/>

Where not already available, the Plan should promote the development of a Groundwater Protection Scheme for the relevant local authority areas covered by the Plan.

Consideration should also be given, where relevant and appropriate, to promotion of the inclusion of Policies and Objectives in the Plan for the following:

Enforcement of Planning Conditions related to installation, operation and maintenance of on-site wastewater treatment / septic tank systems.

Connection of all remaining houses within Town Boundary to the Wastewater Treatment Plant.

The development of a wastewater leak detection programme. The use of a strategic metering system to aid in leak detection should be considered

The implementation and enforcement of the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009.

1.5 Water Conservation

The Plan should include a stronger emphasis/ commitment measures to promote conservation of water. In this context, the development of a Water Conservation Strategy should be *Grangegorman Development Agency EPA Submission 07.12.2010 Draft Strategic Plan and Environmental Report 4 of*

considered, and where relevant addressed in combination with adjoining local authorities. The Strategy should address new and existing developments within the Plan area. Where such a Strategy is being developed, specific timescales should be assigned to its preparation with clear responsibilities and timescales for its implementation.

1.6 Water Services Act 2007- Strategic Water Services Plans

The Plan should include promote support proper planning and sustainable development including sustainable use of water resources.

1.7 Flood Prevention and Management

The Plan should promote the appropriate zoning of lands and restriction of use in areas liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas. A specific Policy should be included to provide for/promote appropriate flood risk assessments to be undertaken, where development(s) and zoning are being proposed in the Plan area where there is risk of flooding.

The Plan should make reference to the E.U Directive (2007/60/EC) on the assessment and management of flood risks entered into force on 12 December 2007. The provisions of this Directive include the development of flood risk management plans.

The Flood Risk Management approach as adopted by the Office of Public Works (OPW) should be promoted, as appropriate, in consultation with the OPW where there is potential risk of flooding in the Plan area. You are referred to the Planning Guidelines on flooding in *“The Planning System and Flood Risk Management - Guidelines for Planning Authorities (Environment, Heritage and Local Government – OPW, November 2009* which can be consulted at:

<http://www.environ.ie/en/Publications/DevelopmentandHousing/Planning/NationalSpatialStrategy/Flood%20Risk%20Management/>

The Plan should promote the development, where appropriate, of adaptation measures to account for the likely increased risk of flooding due to Climate Change within the Plan area.

1.8 Integration of infrastructure, zoning and development

Zoning for development within the Plan area should be linked to availability and adequacy of water supply/waste water treatment infrastructure and capacity. A strong commitment to the provision of adequate and appropriate infrastructure in advance of development within the Plan area should be promoted through the Plan.

The implications of Flood Risk likely to be associated with already zoned and undeveloped lands in the Plan area should also be considered. This should be considered in the context of possible rezoning options as appropriate.

The above requirements should be promoted in the Plan and as appropriate should be reflected in relevant Policies/Objectives associated with relevant Land Use and other relevant Plans within the Plan area.

2 BIODIVERSITY

2.1 EU Protected Habitats and Species in Ireland

The Plan should include a clear Policy to protect all designated habitats and species within the area. It is noted that particular emphasis is placed in the SEA ER on the occurrence of *Grangegorman*
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bats within the Plan area. Refer to the Water Framework Directive Register of Protected Areas in particular those relating to biodiversity.

The Plan should include Policies/Objectives to ensure that the local authority, in fulfilling its responsibilities in the supply of services, zoning of lands and authorisation of development, addresses the threatened habitats and species identified in the National Parks and Wildlife Service Report *“The Status of EU Protected Habitats and Species in Ireland”*, (NPWS, Department of the Environment, Heritage and Local Government, 2008) which occur within or adjoining the LA areas.

<http://www.npws.ie/en/media/Media,6440,en.pdf>

In addition, provisions should be made in the Plan to deliver insofar as is possible, and as appropriate, the requirement Article 10 to *“improve the ecological coherence of Natura 2000 by maintaining, and where appropriate developing, features of the landscape which are of major importance for wild fauna and flora”*,) Further, the Plan should include a Policy/ Objective to reflect the provisions of Article 3, Paragraph 3 of the Habitats Directive, to *“endeavour, where they consider it necessary, in their land-use planning and development policies, and in particular, with a view to improving the ecological coherence of the Natura 2000 Network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora”* as referred to in Article 10, namely *“Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.”*

The Plan should include any sites listed on the Water Framework Directive Register of Protected Areas in particular those relating to biodiversity, occurring in the Plan area. Any such sites should also be addressed in the SEA/ER as appropriate.

National Biodiversity Data Centre (NBDC)

The National Biodiversity Data Centre has recently launched a new website.

<http://www.biodiversityireland.ie/>. This website is to be used as a national resource, presenting data and information on all aspects of biodiversity. It also serves as a link between the NBDC knowledgebase and the provision of high quality information to improve decision making. Key features of the website include:

Easy access to over 1 million observations of Ireland’s Wildlife

Provisional distribution maps of 8545 Irish species presented on national Biodiversity Maps available here: <http://maps.biodiversityireland.ie/>

A latest news feature to highlight any new developments in wildlife recording and surveying in Ireland

Annex I/ Annex II /Annex IV Habitats Directive

The Plan should also refer to the protection of Annex I and Annex II - Natural Habitats Animal and Plant Species respectively of Community Interest whose conservation requires the designation of Special Areas of Conservation and Annex IV –Animal and Plant Species of Community Interest in need of Strict Protection of “Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora” which occur within and adjoining the Plan area. Grangegorman Development Agency EPA Submission 07.12.2010 Draft Strategic Plan and Environmental Report 6 of 19

Management Plans for Designated Areas

The availability and status of Management Plans for the Natura 2000/ European sites within the Plan area, required in accordance with the Habitats Directive, should be determined. Where available, the Plan should include a specific Policy/Objective in local authority land use Plans to take into account the objectives and management practices proposed in the available Management Plans.

Appropriate Assessment

The Plan should include, where relevant, a clear Policy/Objective that sets out a requirement for Appropriate Assessment Screening for new/reviewed/amended Plans or proposed projects, being prepared by the local authority for the Plan area that may have the potential to impact on Natura 2000 sites. Consideration should be given to carrying out an Appropriate Assessment screening to determine the potential for likely significant effects on Natura 2000 sites within and in the zone of influence of the plan area. Potential for cumulative / in-combination effects associated with other relevant Plans/ Programmes / Projects should also be determined.

A determination for the requirement for an Appropriate Assessment of all Land Use Plans and related variations should be made in consultation with the Department of Environment, Heritage and Local Government - National Parks and Wildlife Service, and this should be highlighted in the Plan.

The Plan should promote the application of the Guidance set out in the recent DoEHLG Publication „Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities (2009)“.

<http://www.npws.ie/en/media/NPWS/Publications/CodesofPractice/AA%20Guidance.pdf>

The Plan, should promote the setting up of procedures to ensure compliance with the requirement of Article 6 of the Habitats Directive.

2.2 Non-Designated Habitats and Species

The Plan should promote the protection non-designated habitats, species and local biodiversity features including rivers, wetlands, hedgerows, individual trees, streams, grassland, coastal areas, etc. The provision of appropriate buffer zones between local biodiversity features and areas zoned for development should be considered. The Plan should provide for the promotion of protection of linkages between local biodiversity features and ecological networks e.g. hedgerows, watercourses etc. Opportunities for enhancement of local biodiversity features should be promoted where appropriate. The ER should include an assessment of the impact of the Plan on non-designated sites and species (e.g. the number of trees and actual to be removed should be identified and mapped. In addition, habitats of local value within and adjoining the Plan area should be surveyed and mapped. This should then inform an Integrated Landscape /Habitat Plan for the Plan area).

The Plan should support / acknowledge existing Local Heritage / Biodiversity Plans and should promote the implementation of key actions set out in these Plans. Where not already prepared and adopted through County Development Plans, the Plan should promote the preparation of County and where relevant and appropriate Local Heritage/ Biodiversity Plans.

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2.3 Habitat Mapping

The Plan should promote the inclusion of a Policy/Objective, as appropriate, for phased and co-ordinated Habitat Mapping (including wetlands) within the Plan area.

This Habitat Mapping should be undertaken at an appropriate scale and in accordance with agreed national Habitat Mapping Methodology. This mapping should be undertaken on a phased basis and should have specific timescales assigned.

The scope of this mapping should be agreed in consultation with the National Parks and Wildlife Service – Department of the Environment, Heritage and Local Government, the Heritage Council, the relevant Regional Fisheries Board and other relevant statutory and non statutory nature conservation interest groups.

2.4 Alien species and Noxious Weeds

The Plan should promote more strongly the implementation of measures to control and manage alien/invasive species (e.g. Japanese knotweed, Giant Hogweed, Zebra Mussel etc.) and noxious weeds (e.g. Ragwort, thistle, dock etc.) within the Plan area.

Invasive Species Action Plans are available for a number of species on the Invasive Species Ireland website. Information on invasive species can be found at:

<http://www.invasivespeciesireland.com/>

The National Roads Authority has produced a report entitled the “Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads” which can be found at:

<http://www.nra.ie/Publications/DownloadableDocumentation/Environment/file,16172,en.pdf>

The measures set out in these documents should be applied at a Plan level where appropriate and could control further spread of these species at city and local level.

3 AIR, NOISE AND CLIMATIC FACTORS

3.1 Noise

The Plan should include reference to and, as appropriate, promote the implementation of Noise Directive and associated national regulations as well as the specific “measures”/ “actions” set out in or due to be set out in a proposed “ Noise Action Plans” for the relevant local authority area within the Plan area.

3.2 Air & Climatic Factors

Consideration should be given to promoting specific Policies / Objectives in the Plan for the protection and improvement, as appropriate, of air quality within the Plan area, particularly in areas zoned for increased urban and transport related development.

The Plan should promote specific Policies/Objectives and associated provisions for the development and promotion of appropriate climate change adaptation and mitigation measures that can be implemented through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc.

The Plan should also promote the inclusion of specific Policies within local authority land use plans, which promote the integration of the implications of Climate Change at a regional and

local level, in land use planning within the Plan area. In particular the Plan should refer to *Ireland's National Climate Strategy 2007 – 2012*. This is available at:

<http://www.environ.ie/en/Environment/Atmosphere/ClimateChange/>

The Plan should also address how climate change might impact on the implementation of land use plans in the Plan area. In this regard you are referred to the potential impact of climate change on “increased risk of flooding” and possible “increased occurrence of drought conditions”

You are referred to *Air Quality in Ireland 2008– Key Indicators of Ambient Air Quality*, (EPA, 2009) “, which sets out the most recent status in each of the four air quality zones in Ireland. You are referred to this report at: <http://www.epa.ie/downloads/pubs/air/quality/>

The objectives of EU and Irish air quality legislation is “to avoid, prevent or reduce harmful effects on human health and the environment as a whole”, and the relevant local authorities, where appropriate, “shall promote the preservation of best ambient air quality compatible with sustainable development.” To this effect the Plan should include as appropriate a Policy/ Objective to ensure this requirement is complied with.

Consideration should be given to promoting specific Policies / Objectives in the Plan for the protection and improvement, as appropriate, of air quality within the Plan area, particularly in areas zoned for increased urban and transport related development.

3.3 Radon

The Plan should consider concentrations of radon, which may occur within the Plan area. In this context, you are referred to available Radon Maps provided by the Radiological Protection Institute of Ireland (www.rpii.ie) with regard to assessing the risk of radon, which should be integrated as appropriate into the Plan.

4 LANDSCAPE CHARACTER ASSESSMENT

The Plan should promote the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of regional, county and local value.

Consideration should also be given to promoting the requirement for an appropriate “Visual Impact Assessment” for proposed development with potential to impact adversely on significant landscape features within the Plan area. The Plan should promote the application of standard impact assessment methodology for all such development.

Consideration should also be given to the promotion of the designation, and use of, agreed and appropriate viewing points for these assessments. The scope of each assessment should be agreed in consultation with the relevant Planning Department staff.

The Plan should promote the recognition of visual linkages between established landmarks and landscape features and views which should be taken into account when land is being zoned and when individual development proposals are being assessed / considered within the Plan area. A provision should be included in the Plan to identify key views which should be protected.

5 HUMAN HEALTH / QUALITY OF LIFE

In preparing the Plan, there would be merits in exploring current practice and opportunities with respect to promoting the protection and, as appropriate, improvement of “Quality of Life”. Where relevant, the application of existing “Quality of Life Indices” would be considered in consultation with relevant statutory and non-statutory bodies/organisations.

You are also referred the relevant aspects already referred to above under water, biodiversity, air, energy.

6 INFRASTRUCTURE PLANNING

The Plan should promote the integrated planning for adequate and appropriate infrastructure to service any development proposed and authorised during the lifetime of the individual land use plans within the Plan area. *SEIA1* should be amended to provide a stronger commitment to infrastructure planning/ provisions within the Plan area.

In particular, the Plan should promote the provision of adequate and appropriate wastewater treatment, water supply, surface and storm water drainage, transport, waste management, community services and amenities etc. on planned and phased basis to address any current problems and/or deficits and to reflect predicted increases in population during the life of individual plans adopted within Plan area.

7 URBAN WASTE WATER DISCHARGE LICENSING

The Plan should refer to the requirement under The Waste Water Discharge (Authorisation) Regulations, (highlighted above in Section 1.3) for all for all wastewater discharges, including storm water discharges which come within the scope of these Regulations to be licensed. The EPA is currently in the process of licensing discharges from wastewater treatment facilities.

8 WASTE MANAGEMENT

The Plan should promote the integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity. Priority should be given to provision of adequate and appropriate waste related infrastructure in advance of any development. It is noted and welcomed that *SEIA2* requires the provision of a sustainable waste management system.

The Plan should seek to incorporate relevant guidance and legislation to address issues such as Waste Prevention, Food Wastes, Identification of Historic Landfill Sites, Backyard Burning, Illegal Dumping, Brown Field Development etc

The Plan should promote and incorporate the information, and any recommendations, in the following EPA reports:

The Nature and Extent of Unauthorised Waste Activity in Ireland (Sep 2005) - This report sets out the findings of a nationwide investigation by the EPA’s Office of Environmental *Enforcement* (OEE) on unauthorised waste activities in Ireland and sets out an Action Plan to deal with the issue. You are referred to the report at:

<http://www.epa.ie/downloads/pubs/waste/unauthorisedwaste>

National Waste Report 2008 – you are referred to this Report at:

<http://www.epa.ie/downloads/pubs/waste/stats/>

National Hazardous Waste Management Plan 2008 – 2012 – available at
<http://www.epa.ie/downloads/pubs/waste/haz/>

Ireland "s Environment 2008 – State of the Environment report - This fourth state of the environment report evaluates the state of the environment across a number of themes including, water quality, air quality and emissions, waste, chemicals, land and soil. You are referred to this report at:

<http://www.epa.ie/downloads/pubs/other/indicators/irlenv/>.

9 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

The Plan should highlight that under the EIA and Planning and Development Regulations certain projects that may arise during the implementation of the Plan may require an Environmental Impact Assessment. A clearer section on EIA and as appropriate an objective highlighting the requirement for EIA, should be considered for inclusion in the Plan. There are also requirements with regard to EIA for sub-threshold development. In this regard, you are referred to the following Publications:

"Guidelines on Information to be contained in Environmental Impact Statements" EPA, 2002.

"Advice Notes on Current Practice in the preparation of Environmental Impact Statements", EPA 2003.

In addition to the above, you are referred to the Department of the Environment, Heritage and Local Government"s Publication:

"Environmental Impact Assessment (EIA) Guidance for consent Authorities regarding sub-threshold development", DoEH&LG, 2003.

These documents can be downloaded at: <http://www.epa.ie/downloads/advice/ea/guidelines/>

It should be noted that the Projects would also be required to be screened with respect to the requirement for Habitats Directive Assessment/Appropriate Assessment as required by Article 6 of the Habitats Directive.

You are also referred to the recently published DoEHLG guidance available in relation to Appropriate Assessment „*Appropriate Assessment of Plans and Projects in Ireland* „(DoEHLG, 2009) at:

<http://www.npws.ie/en/media/NPWS/Publications/CodesofPractice/AA%20Guidance.pdf>

10 STRATEGIC ENVIRONMENTAL ASSESSMENT(SEA)

Consideration should be given to the inclusion of a specific Policy/Objective in the Plan to ensure full compliance, with the requirements of *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment* – The SEA Directive and the associated *Planning and Development (Strategic Environmental Assessment) Regulations, 2004*.

The Authority need to be cognisant of their responsibilities with respect to the SEA Directive and related SEA Regulations through the Plan. Consideration should be given to the inclusion of a Policy/Objective clearly setting out the requirements of the SEA and EIA

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Directives in the context of the plan and any future updates, reviews etc, and development which will arise during the implementation of the Plan.

The Plan should promote the development and implementation of Procedures to ensure compliance with the requirements of the SEA Directive and related SEA Regulations for all Land Use Plans within the Plan area.

11 Environmental Management Plan (EMP) /Environmental Management System

The Plan should include a Policy/ Objective which provides a commitment to the preparation and implementation of an Environmental Management Plan/ Environmental Management System(s) for the phases of development (including site preparation, construction, operation and maintenance associated with the Strategic Plan. Individual contractors should be required to comply with the relevant aspects of the EMP/EMS as part of their specific conditions of contract conditions.

12 OBLIGATIONS WITH RESPECT TO NATIONAL PLANS AND POLICIES AND EU ENVIRONMENTAL LEGISLATION

The Plan should refer to the LA's responsibilities and obligations in accordance with all national and EU environmental legislation. It is a matter for the Local authorities to ensure that, when undertaking and fulfilling their statutory responsibilities, they are at all times compliant with the requirements of national and EU environmental legislation.

Environmental Liabilities Directive

As outlined in DoEHLG Circular Ref: EPS/01/09, the LA should be cognisant of the Environmental Liability Directive (2004/35/CE), (ELD), which enforces the Polluter Pays Principle and has been transposed and is now in force in Ireland. In many aspects of their work local authorities are considered "operators" under the legislation and are now liable for any Environmental Damage (damage to water; soil; and species and habitats as defined in the legislation) which they commit. The EPA has been designated as the competent authority for the ELD and has obligations to pursue remediation in cases where Environmental Damage has occurred; or seek preventative measures where an imminent threat of Environmental Damage is posed due to the actions of any operator, whether they are public or private sector.

The EPA will be publishing comprehensive guidance on the Environmental Liability Directive in 2010. More information on the directive is currently available at www.epa.ie and the Environmental Liability Unit of the Agency can be contacted at eluinfo@epa.ie

13 EPA REPORT: IRELAND'S ENVIRONMENT 2008 "MAIN ENVIRONMENTAL CHALLENGES"

The Plan should include relevant Policies and Objectives are included, to address, where appropriate, the "Main Environmental Challenges" for Ireland as set out in Chapter 16 – "Main Environmental Challenges" of EPA Ireland's Environment 2008 (EPA, October 2008). These are as follows:

Limiting and Adapting to Climate Change

1. Mitigating the causes and effects of climate change
2. Adapting to climate change impacts
3. Improving our understanding of climate change

Reversing Environmental Degradation

1. Preventing eutrophication and other water pollution
2. Protecting natural habitats and species populations
3. Remediation of contaminated land

Complying with Environmental Legislation and Agreements

1. Building of a culture of compliance
2. Enforcement of legislation at national and local levels
3. Meeting EU and other international obligations

Mainstreaming of Environmental Considerations

1. Incorporating environmental considerations into policies and plans
2. Ensuring environmentally responsible businesses

3. Changing behaviours

This Chapter can be downloaded at:

<http://www.epa.ie/downloads/pubs/other/indicators/irlenv/43366%20epa%20report%20chap%2016.pdf>

The LA in implementing the Plan and in fulfilling its responsibilities should ensure Plan –making authorities take into account and address, where appropriate, the relevant Environmental Challenges” set out above. Grangegorman Development Agency EPA Submission 07.12.2010 Draft Strategic Plan and Environmental Report 13 of 19

14 SUMMARY OF KEY ENVIRONMENTAL ISSUES AND KEY RECOMMENDATIONS

Water Quality

The need to better address water quality considerations.

Recommendations

More specific information should be provided in relation to the WFD such as current quality status, risk assessment, conservation objectives, protected areas, as well as flood risk, aquifer vulnerability, etc. The protection of these resources and areas should be embedded into the Strategic Plan's Aims/Objectives (including measures to ensure adequate waste water treatment capacity).

Ken McCue on behalf of NGO Insaka Ireland

SUBMISSION FROM KEN MC CUE ON BEHALF OF NGO INSAKA-IRELAND OF SMITHFIELD

Please note that this submission, which is based on a number of conditions, is largely informed by a series of position papers previously submitted to GDA and GCG and the Report 'Joining up the Dots' from the Grangegorman Community Forum via the elected representatives of the Community Stakeholders.

Introduction

In order to develop a World class 'Village of Learning' with full democratic participation of the community of the constituency (as defined in the Act), we believe that the following conditions would have to be applied to the project.

Conditions

1. Extension of the 'five fingers' planning concept to incorporate the following axes, Bolton Street, Smithfield and Gravel Walk
2. Develop Royal Canal Bank Walkway (Carnegie Library to Broadstone) in line with New Walk in City of Leicester and to be called after locally born writer Iris Murdoch 'Walk of Memory'
3. Reopen Broadstone Station as Light Rail and Tram hub and called after local scientist Sir William Rowan Hamilton
4. All buildings on Campus to be 'low rise' only
5. Carparks to be underground with a maximum of 500 cars managed by DITSU and Community Enterprise Coop Trust joint venture
6. Bolton St. and Linenhall complex to be retained in DIT property portfolio, converted to student accommodation and managed by DITSU/Community Enterprise Coop Trust (as Berkeley Student Coop, California, USA)
7. Location of Childcare facilities to accommodate 500 children with Montessori Nursery and Creches (this to be subsidised by car park levy and funds transferred from the wage roll of redundant religious chaplains). This for children of students, staff and local community alike and managed by joint venture coop
8. Location of new mixed gender, non denominational 200 place second level school, managed by CDVEC and incorporating Junior Science Park, Arts Centre and Sports Academy in line with programme of Millfield School, Somerset, UK and based on teaching principles of Harlem High School, New York, USA. This school to be called after the local writer, Austin Clarke
9. Adopt Intercultural Policy and Practice in line with norm at De Montfort University, Leicester, UK and declare the Campus a 'Racist Free Zone'
10. Adopt 'Good Neighbour' principles in line with the norm at Dublin City University
11. Adopt a targeted local student access programme and commence 'War on Illiteracy' (ref: recent OECD report)

12. Adopt a Sports driven 'Fit not Fat' slow food programme working with local 'Hall of Healing' HSE Centre, Sports Academy and Campus food centres
13. Sports facilities to be extended to incorporate proposed John Giles Football Academy at Old Fish Market site and Garda Grounds at Phoenix Park
14. Develop the Ivor Browne Arts Therapy Centre in former Laundry Building
15. Develop the Hospital Museum to incorporate a DIT museum and interpretative centre on North Dublin Union and Workhouse including memorial to female deportees to Australia
16. Convert former Richmond Hospital to Joint-use Library (based on library at Fort Lauderdale, Florida, USA) to be named after George Berkeley (associated with St. Paul's Church, North King St.)
17. Develop a non-denominational campus and facilitate inter-faith dialogue in the constituency
18. Develop Childrens Science Centre at Smithfield
19. Develop Artists and multimedia studios at Smithfield, Markets Area, Phibsborough and Cabra
20. Develop Youth Theatre using 'per cent for art' scheme in the name of local actor, Sir. Michael Gambon
21. Adopt Fairtrade Campus in line with recommendations of Dublin City Council
22. Adopt 'Total Access' policy for people with disabilities
23. Adopt Anti-Child Labour Policy in line with International Labour Office Directives
24. Locate Garda Sub-Station as per 'Campus Cop' in UK

RIAI - Representing Irish Architects



Sustainability task force, RIAI, 8 Merrion Square, Dublin 2

e-mail communications@gada.ie

Grangegorman Development Agency,
St. Brendan's Hospital,
Grangegorman,
Dublin 7.

7th Dec. '10

Re. Observations on draft Strategic Plan and Environmental Report

The Strategic Plan is an ambitious project to convert an insular city site into a unified DIT campus, connected to its neighbours beyond the wall, and the city.

It has the potential to inform and initiate economic and social development in the area – providing viable connections to adjacent areas, and beyond, are provided in tandem with the developing project.

While we would be slow to criticise in any substantial way for a number of reasons, including the fact that the proposal won an architectural competition, these comments are in response to the public consultation on the draft Strategic Plan and Environmental Report:

- a) The strategic plan offers the benefit of maintaining a large portion of the available open space currently existing on the Grangegorman, and not available to the public in its current use. The open space is utilised in the form of a defined 'public realm' with the provision of sporting facilities and public spaces of varying scale and intensity. The extent of open space provided is welcome, albeit at the expense of intensive development at the northern flank of the campus. There is a danger that the public space promised may, under economic constraints, be implemented solely as infrastructure - without the quality and detail necessary to sustain such a significant public realm. Such a reduction in intent should be avoided at all costs.

It is of paramount importance that the sustainable principles that inform the project at this stage are imbedded in the detail design and execution of the project as it unfolds – it is of particular importance that the ongoing cost of running the campus is minimized, and that the environment created by the campus provides for the long term quality of public realm to sustain its use and enjoyment by the multiplicity of users envisaged.

b) The project has, if not a dependency, a reliance on the success of related infrastructural implementation and land use. The adjacent development of the Broadstone site, adjacent land, provision of a LUAS line and access from the lands to the west all bear heavily on the ultimate success of the project. It remains to be seen if such developments will share the vision and clarity of Grangegorman with timely implementation and co-operation.

Access to the site is very restricted with long walking routes from public transport, limited by the number of entrances through the boundary wall:
eg through Broadstone (not part of site or in same ownership)
or a residential cul-de-sac at the NW end of Stoneybatter:

As explored further, at (d) below; mixed use development is unlikely to proceed immediately, either retail or offices, making residential buildings even more isolated from facilities or amenities.

c) In detail, the strategic plan presents a number of problems to be resolved by the future design teams that will implement the campus design-

- providing a sustainable environment to the narrow intermediate spaces between some of the campus buildings, particularly at the high points identified in the proposal.
- managing the narrow access corridors to the existing site, particularly if adjacent development and land consolidation does not progress.
- maintaining unity of purpose and response.
- ensuring a unified installation and common standard for running the campus at zero carbon, the anticipated standard required as the first campus buildings will near completion.

We note that, unfortunately, HEIGHTS & MASSING are much higher than stated in the summary, in several locations. Hence, the report makes statements about the impact of the development on the neighbourhood, which don't stand up to scrutiny:
eg. "Buildings are mostly four to six storeys",

As an alternative, high-profile development, such as in Smithfield, is currently mostly vacant, and may make a good alternative location, at least in the interim?

There may be another procurement model which should, at least, be explored.

In conclusion, The 'Grangegorman Strategic Plan' must be welcomed as providing an important template for the development of the project, one that must be implemented in the same considered manner as the strategy outlined in this consultation proposal.

Alec Darragh

To: GDA

Date: 7th December 2010

From:

10.5 Grangegorman Villas Grangegorman Lower

Dear Sir/Madam

Grangegorman Villas is a small row of residential houses.

The draft plan has ignored the impact that the proposed development will have on this small community.

It is proposed to place intensively occupied high rise student accommodation directly behind us, and the main car park entrance a few metres from the end of our terrace.

The car park will be in use day and night. This part of Grangegorman Lower is very narrow and can only accommodate single traffic. This huge car park being located on this narrow stretch of road will cause road congestion, noise and disruption. It is our concern that the very limited parking we currently have will be targeted.

The student accommodation directly behind us will also create noise both day and night.

We have put our concerns on this matter on the record.

The plan sandwiches this small row of residential houses between student accommodation and intense use car parking. As stakeholders, we find the prospect of this intolerable. The proposed plans by the GDA will have a massively negative effect on the lives of the occupants of Grangegorman Villas.

Please reconsider.

Yours Sincerely

Alec Darragh

Marianne Lee and Justin Furlong

To: GDA

Date: 7th December 2010

From:

7 Grangegorman Villas Grangegorman Lower

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Please reconsider.

Yours Sincerely

Marianne Lee

Justin Furlong

Pat Fitzpatrick (Fitzpatrick catering Ltd.)

Dear Sirs.

Having seen the plans for the development of the Grangegorman facility I wish to commend the proposed regeneration of the area.

As a past resident of Phibsborough I feel it can only be extremely beneficial to the Dublin 7 area and also indeed to the entire city of Dublin.

The lands concerned are currently totally underutilized whilst a lot of the buildings on the Grangegorman campus are dated, derelict, ugly and a reminder of a part of our past I personally would rather forget.

The vision, as I perceive it, of the Grangegorman Development Agency is one of a modern, contemporary educational quarter of our city geared towards developing a hub that would be recognized both within our country and internationally as a testament to what we Irish can achieve, even in the midst of our greatest ever economically challenging period.

The jobs that would be created during the construction phase of the project and beyond that, would obviously be of tremendous benefit to the people of the local area and would give a massive boost to the local economy.

Although a large investment would be required for the construction of the campus, I feel it would be money very well spent and would in time, give a healthy return on funds invested.

I wish the GGDA every good fortune with the proposed project and sincerely hope that the plan comes to fruition in its entirety.

Kind Regards
Pat Fitzpatrick

Fitzpatrick Catering Ltd.
Cafe Haven
Unit 10 Rosemount Business Park
Ballycoolin
Dublin 11
email caterpat@synergy.ie Phone 01 8242020/8242550 Fax 01 8242039
Mob. 0872593885

Nicholas Fitzgerald (Private Individual)

Dear Ronan,

I will be presenting two submissions.

They are completely different in both scale and purpose.

I have been speaking and emailing Laurie Schoeman Managing Executive Director of New York Sun Works who are involved heavily in urban agriculture in New York.

What I am proposing is the building of a hydroponic rooftop greenhouse for growing of fruit, vegetables, lettuces, herbs and more. To understand more about hydroponic growing, I recommend you watch this video <http://www.vimeo.com/9829221> It shows clearly how hydroponics works as well as the impact for an urban farming space.

Benefits

The growth of fresh produce for the new college to use in classes and for food for the college population.
Innovation - This type of facility has never been seen in Ireland let alone on any scale.

Usage of dead roof space.

Capture of rain water for use within the urban farm.

Insulation increased to whole building due to greenhouse on roof.

It would become a part of various different programmes and modules within the college. Huge beneficial implications for all culinary based modules.

Carbon neutral, the project would be run from renewable energies such as wind, solar as primary sources and diesel generator powered by vegetable oil as secondary.

The project as a whole is very green and sustainable and would integrate organically with the college.

Yesterday New York Sun Works opened a brand new greenhouse on top of Manhattan School for Children (MSC)

Here are a few articles that have been published about the opening:

<http://www.theepochtimes.com/n2/content/view/47075/>

<http://www.dnainfo.com/20101206/upper-west-side/rooftop-greenhouse-at-upper-west-side-school-will-provide-cafeteria-food-science-lessons> <<http://www.dnainfo.com/20101206/upper-west-side/rooftop-greenhouse-at-upper-west-side-school-will-provide-cafeteria-food-science-lessons>>

[http://www.foodandtechconnect.com/site/2010/12/scott-stringer-helps-launch-nycs-first-rooftop-greenhouse-science-laboratory-at-manhattan-school-for-children/?utm_source=feedburner&utm_medium=twitter&utm_campaign=Feed:+foodtechconnect+\(Food%2BTech+Connect\)](http://www.foodandtechconnect.com/site/2010/12/scott-stringer-helps-launch-nycs-first-rooftop-greenhouse-science-laboratory-at-manhattan-school-for-children/?utm_source=feedburner&utm_medium=twitter&utm_campaign=Feed:+foodtechconnect+(Food%2BTech+Connect)) <[http://www.foodandtechconnect.com/site/2010/12/scott-stringer-helps-launch-nycs-first-rooftop-greenhouse-science-laboratory-at-manhattan-school-for-](http://www.foodandtechconnect.com/site/2010/12/scott-stringer-helps-launch-nycs-first-rooftop-greenhouse-science-laboratory-at-manhattan-school-for-children/?utm_source=feedburner&utm_medium=twitter&utm_campaign=Feed:+foodtechconnect+(Food%2BTech+Connect))

[children/?utm_source=feedburner&utm_medium=twitter&utm_campaign=Feed:+foodtechconnect+\(Food%2BTech+Connect\)>](http://children/?utm_source=feedburner&utm_medium=twitter&utm_campaign=Feed:+foodtechconnect+(Food%2BTech+Connect)>)

The 1500sq ft green house that was recently built cost \$700,000 (€525,000 roughly) which grows 8000 pounds or 3630 kilos of fresh organic produce every year(I will find out how much that would save/make the college based on a greenhouse of this size). The total rooftop space in Grangegorman will be much bigger sq footage than 1500 so the potential for this idea to expand and possibly making the buying of produce into the college obsolete for classes and canteens is very realistic.

This project would integrate D.I.T. further into the green corridor that connects D.C.U. , D.I.T. , The Dublin Airport Authority, Ballymun regeneration as well as other major bodies. The initiative is based on sustainable green innovation which would gain D.I.T. substantial acknowledgement and credit for leading in this field.

<http://www.thegreenway.ie/thegreenway/>

Let me know what you think,

Ps. This has been very rushed to get this in on time as I am working a lot in my new job. I will be getting further information very soon to add and build on the submission.

If you have any questions please do not hesitate to ask.

This project would be spearheaded by myself as I am planning to live in New York and work with Laurie and New York Sun Works.

Regards,

Nicholas

--Second submission--

Based on a conversation and email with you about doing a time lapse video of the college being built, I got in contact with a producer in DCTV (Dublin City Television) about how much it would cost and the logistics of carrying it out. You recommended that as a pilot it might be a good idea to carry one out on the new health center. These are the projected costs involved in two cameras taking three photos a day:

1 x Canon 5D MKII with kit lens - £2300 http://www.onestop-digital.com/index.php?dispatch=products.view&product_id=33350

1x Canon 5D MKII - £1600 http://www.onestop-digital.com/index.php?dispatch=products.view&product_id=333491

1 x Wide Angle Lens - £294 http://www.onestop-digital.com/index.php?dispatch=products.view&product_id=33334

2 x Battery Grips - £338 http://www.onestop-digital.com/index.php?dispatch=products.view&product_id=33286

2 x Timers - \$300 <http://www.amazon.com/Canon-TC80N3-Remote-Control-Cameras/dp/B00009XVA3>

2 x Manfrotto Tripods \$260 http://www.amazon.com/Manfrotto-7302YB-M-Y-Tripod-Ball/dp/B001TK3EJE/ref=sr_1_3?s=electronics&ie=UTF8&qid=1291684046&sr=1-3

8 x 16gb CF Cards \$400 http://www.amazon.com/SanDisk-Memory-SDCFH-016G-A11-Retail-Package/dp/B002TXJUI8/ref=sr_1_4?s=electronics&ie=UTF8&qid=1291684189&sr=1-4

Parts and Labour to get huts built around cameras - Around 500 Euro

1 x 1.5 teradrive - \$160 - <http://www.lacie.com/products/product.htm?pid=11377>

This project would be a great way of recording a substantial part of Irish history in education. #

Please let me know what you think, these costs are based on a low/mid range set up.

This project if allowed to go ahead would be supervised mainly by John Breslin who is a producer in DCTV and has carried out projects like these before but on a smaller scale

--

Nicholas P. FitzGerald