

Daniel Hegarty & Tanya Doyle

356 Sth Circular Rd • Dublin • D08 PP9Y • Ireland

Tel. [REDACTED]

16th May 2022

White Heather ABP 313278/22

Dear Madams, Dear Sirs,

We make this submission in respect of the proposed Strategic Housing Development on the grounds of White Heather Industrial Estate. Generally speaking we have no objection to development of the site however it is critical to note that quality housing including homes for families and quality public open space is lacking in the area and is urgently required. We outline our observations as follows:

'Build to Rent'

The Build-to-Rent report highlights that the development intends to provide *"for a vibrant and diverse community, while delivering a connected residential neighborhood"*, however the opposite is true as the development fails to provide suitable accommodation for families. Apart from the 7 townhouses, the development provides for exclusively Build-to-Rent apartment units. This type of development will polarize the existing community with tenants who have no long-term vested interest in the area and create a gated and disconnected community. Rental accommodation is vital in our city and we, like the majority of our generation, rented for a long time before being able to purchase our home on the South Circular Road, therefore we do not regard renters as lesser or second-class citizens. With the unfettered proliferation of Build-to-Rent developments in the city, renters are becoming the majority of residents in Dublin City Centre and as such must be protected through sustainable, long-term planning. Dublin urgently needs more housing but we need better housing. As the Board will be aware, there is a significant number of planning applications and grants of planning permission for Build-to-Rent units in the Greater Dublin Area, such that the Chief Executive of Dublin City Council has recently noted that there has been an over concentration and over dominance of this type of accommodation and lack of balance in providing housing throughout the City. Build-to-Rent apartments are built to a lower standard in respect of size and balconies than general apartment developments, reducing the quality of accommodation for future residents. Given the huge number of Build-to-Rent units proposed in the Player Wills / St Teresa's Gardens development and the multiple student accommodation developments lining Cork Street there is grave concern that there is an over intensification of Build-to-Rent and Student Housing in the area which do not lend to the creation of sustainable communities. If we are to ensure a quality long-term supply of family and community friendly accommodation in our city, we believe that the standards for Build-to-Rent accommodation must be brought up to the level of general apartments to ensure that the city's housing stock can be flexible and adaptable for housing need in the future. As Dubliners who have had the experience of renting for many years we note that in particular, the storage space available in this and other Build-to-Rent developments is insufficient for people who will live in this accommodation long-term. Given the current and timely focus on environmental sustainability and carbon mitigation we note that it will take a significant amount of carbon to develop and build these apartments and this carbon impact cannot be considered to be mitigated over the long-term if these apartments are not flexible and suitable for accommodation for many decades into the future.

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Scale, Height and Massing

We have grave concern at the scale and height of the proposed development given that the site is not a landmark site, not fronting onto any prominent corners and/or addressing any public open space. The significant height of 10 stories is excessive given the surrounding context of 2 story houses and will have a significant visual impact on the surrounding context. As per the pre application with An Bord Pleanála inspectors, the inspector notes *"while the site is considered suitable for high density development, this is subject to the provision of a high quality scheme, which protects the residential and visual amenities of the wider area. - have serious concerns regarding the visual impact, due to the height and scale. - 10 storey Block B03 should be reconsidered having regard to urban context"* It is difficult to assess the height with the information submitted and it would have been beneficial to have a physical model to assess the impact on our home and street however the selection of the 10-storey block positioned at the northern end of the development rather the south side facing onto water, with south facing balconies for new residents is a sub-optimal design. Providing for the relocation on the site of the higher density accommodation would also reduce any potential for overlooking and would be more beneficial for the future residents.

Daylight & Sunlight Analysis and Privacy

We are of the view that the scale and height of the development is excessive and will impact on the daylighting of our home as well as on our privacy. Considerable information has been submitted on the Daylight and Sunlight analysis in Section 14 of the Environmental Impact Assessment and Section 14.6 of the Appendices, while the impact appears to be small on our home the document is very technical and difficult to assess, a shadow analysis diagram indicating the impact on our property should have been submitted to allow us to visually assess the impact. The BRE guidelines recommend that a target value of 27% Vertical Sky Component should be obtained to achieve reasonable levels of daylight, however, the developer in this instance has commissioned a consultant to justify that Vertical Sky Component levels of 10-15% are acceptable – we believe they are not. We have significant concerns in relation to sunlight and loss of privacy from overlooking arising from this development, which we see the An Bord Pleanála inspector also noted in their report at pre-planning stage. A number of our neighbours will see sunlight to their properties reduced by more than 1/3, and in some cases as much as 40%. These concerns haven't been addressed in the final application and we would appeal that a condition for a greater setback from existing properties be imposed to protect our privacy and that of our neighbours. The inspector's reports also noted a "concern of overshadowing of public open spaces" in this development, which is vital to ensure livability in this high density development for the future residents. The report provided by the developer notes "adverse" alterations for daylight for residents in the surrounding area and we request that conditions be attached to mitigate this.

Part V

The Part V social housing accommodation is marginalized to the fringes and is not integrated into the scheme, our concern is that these units are not properly integrated into the development creating at best a two-tier community or worse still two separate communities. Best practice for integration says that

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these housing units should be “pepper potted” throughout the development to ensure that social & affordable residents do not suffer social exclusion and have the same and equal access to the amenities of the development as their privately-renting neighbours. This marginalization will have a negative impact on the adjoining community and neighborhood but more importantly it will have a negative, “ghettoizing” effect on those residents who will live in these social housing apartments.

Access To Amenities

We are committed to sustainable city living and have made a conscious and deliberate decision to buy a home in the city centre of our home town. For us clever, high density living in any city makes viable and sustainable many important public and private services. We note with enthusiasm that the plans set out 7 “distinct character areas” making up approx. 2,960m² linking through Canal Square, a pedestrian priority street between residential blocks to a publicly accessible landscaped Linear Park along the Grand Canal to enhance the integration of this development into the community. We also note the provision of amenities in this development such as a gym, event suite, crèche, workshop/co-working space and cinema/media room however these amenities appear to be restricted to residents only. We request that a condition be added to any permission mandating these amenities be open to the whole local community as we believe this will enhance the integration of the development and its residents into the local community.

As

residents and homeowners we enthusiastically welcome sustainable and considered development in our community. We would ask that the Board take into consideration our observations as a constructive contribution to enhance the quality, sustainability and fairness of our neighbourhood.

Sincerely,

Daniel Hegarty & Tanya Doyle
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