

**White Heather Industrial Estate , Dublin 8**  
**DCC REF- SHD0009/22 and An Bord Pleanála ref- ABP-313278**

Plans to develop this site for much needed housing which is most welcome.

I have numbered below pertinent points for consideration by ABP;

1. Major concern that it's a B2R development in an area that has a significant concentration of proposals/applications for this type of accommodation.
2. While it is not presently contained within the City Development plan- it is proposed to significantly limit B2R in the 2023-2028 City Plan- attempting to dilute the negative impact and the failure to address local housing needs. B2R skews housing availability and affordability in the area.
3. B2R complexes provide for a more transient community as do the proposed 198 one bed apartments. It is substandard accommodation that deters long term dwelling and decreases the stability of the community.
4. While images of the height imposition on the area are provided , they seem intentionally selective and fail to display how the residential homes at St James Tce and Priestfield Cottages are impacted upon. The developer hasn't demonstrated or given consideration to the proximity to these homes, and has conveniently ignored the many home extensions that further increase the proximity of this development.
5. Ratio of occupants to car park spaces is limited to 106 spaces for a potential population of 1000k people. It will generate overspill onto adjacent residential streets already at capacity in terms of on-street parking. The developer has failed to demonstrate that this limited provision will not have a negative impact on the surrounding local road network already congested and with limited parking facilities. The proposed large neighbouring developments like Player Wills and Teresa's Gardens also depend on exterior car parking which must be taken into consideration.
6. Height, scale and density must be reduced to prevent altering the Victorian streetscape and reduce the loss of light to this long established community. The scheme is overbearing and will also have a significant impact on the skyline.
7. Need to demonstrate the amount of units planned for universal design.
8. Low water pressure already a problem. This needs addressed.
9. The impact on the canal and its leisure open space amenity - the height, scale and proximity will create shadowing on this Blue and Green space. Waterways Ireland have advanced plans to develop this as an important amenity for Dubliners the developer should adequately address concerns that it will compromise these plans.

Le meas,

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