

To whom it may concern,

Please find below submission in respect of the proposed Strategic Housing Development on the grounds of White Heather Industrial Estate

This submission is on behalf of the Tenters Residents Association.

We have largely used the content of a separate submission made by Rebecca Moynihan and Darragh Moriarty of the Labour party, whose submission we support.

At present the proposals for the site are for the construction of 335 Build-to-Rent residential units on the site, including 328 Build-to-Rent apartments and 7 3-storey, 3-bed townhouses. The selection of the 10-storey block to go at the northern end of the development rather than the south side of facing onto water, with south facing balconies for new residents isn't the optimum 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. As per the pre application with ABP 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" The Part V social housing component of the development is on two outer ends of the development. Best practice for integration would say that these housing units need to be pepperpotted throughout the development to ensure that the residents do not suffer social exclusion and have the same and equal access to the amenities of the development as their privately-renting neighbours. Apart from the townhouses, the development provides for exclusively Build-to-Rent apartment units. 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 overconcentration and overdominance 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.

If we are to ensure a quality long term supply of accommodation coming on stream, we believe that the standards between BTR and general apartments need to be harmonised internally to ensure that the housing stock- which takes a significant amount of carbon to produce- can be flexible and adapted for housing need in the future. In particular, the storage space available in this and other BTR developments is insufficient for people who will live in this accommodation long-term. 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 try and justify that VSC levels of 10-15% are acceptable – we believe they are not. There are significant concerns in relation to sunlight and overlooking for residents in Priestfield and St. James's Terrace arising out of this development, which the ABP inspector also noted in their report at pre-planning stage. A number of local residents will see their sunlight 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 for a condition for a greater setback from existing properties be imposed to protect the privacy of residents. The inspectors reports also note 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 that

“adverse” alterations for daylight for residents in the surrounding area and conditions need to be attached to mitigate this. Overall, we welcome development of this site and would ask that the Board take into consideration our points raised above as a constructive effort to enhance the quality of the scheme.

Regards,

Robert Gleeson

On Behalf of the Tenters Residents Association

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