

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

Rosanna Bravar
2 St. James's Terrace
Dolphin's Barn
Dublin 8
D08X4Y1

14th May 2022

Re: Planning & Development Act 2000 and the Statutory Regulations made thereunder (as amended). Observation in relation to Strategic Housing Development for the demolition of the existing industrial buildings within the site, the change of use of No. 307/307a South Circular Road from residential to shared workspace/office space, construction of a build to rent development including 335 no. residential units, creche, café and all associated site development works at White Heather Industrial Estate, South Circular Road, Dublin 8, a residential dwelling at No. 307/307a, South Circular Road, Dublin 8 and an industrial building at 12a St James's Terrace, Dublin 8.
An Bord Pleanála Ref. ABP-TA29S.313278

Date of application: 11th April 2022

Five week period for observations ends: on or before end of 16th May 2022

Dear Sir / Madam

As owner occupier of 2 St. James's Terrace, I am providing my observation to An Bord Pleanála in respect of this Strategic Housing Development (SHD) application for approval lodged by U and I (White Heather) Limited (the applicant), for the above described development.

In accordance with the statutory regulations, I have paid to An Bord Pleanála for the appropriate statutory observation fee of €20.

I confirm that the submission is made within the statutory five week period in accordance with the Planning and Development Regulations 2001.

I have attempted to review the masses of documentation provided for this application by the developers through their website and note no attempts were made to directly communicate this information to me, or any members of our community here in St. James's Terrace.

1. Overview

I understand that the land in question is zoned as Z1 (residential) and Z9 (recreational land - along the Grand Canal edge) and is considered a SHD or strategic housing development.

It is clear that this land is a prime location for much needed housing development in Dublin 8 and has the potential to make a valuable contribution to solving the chronic housing crisis in Dublin and Ireland. However, we feel that in the wider context of huge developments all around us in Player Wills, Bailey Gibson, St. Teresa's Gardens, Securicor/ Herbeton Rd and so on, there is a rush to flood the area with high-rise, high-density developments which will have a huge cumulative detrimental effect on the area, and existing services will struggle to support.

The dominance of "Build to Rent" units in all these developments is to maximise investment fund profit and any contribution to solving the housing crisis feels incidental. This community needs a better blend of social housing, affordable housing, rental properties and private family homes to actually address the housing crisis. This development seems to be about maximising housing density and developer profits to detriment of all other aspects of life here in Dolphins Barn and Dublin 8 in general.

2. Concerns:

2.1 Impacts on privacy

To date our back garden of 2 St. James's Terrace has been an oasis of calm and quiet near to one of the busiest roads in the country, the R110. We understand that development must happen to meet the demands posed by the housing crisis, but now I will see 3 storey townhouses, whose walls will be less than five metres from our home. The windows of blocks 2 and 3 will be overlooking our home office/studio, garden and our bedrooms and kitchen. In addition, we will have the balconies of the three upper stories of block 2b's northwest corner looking over us, plus the upper floors of balconies on block 3b's west side and block 3's 4th and 5th floor balconies on its northern side, all within 50m of our back door directly overlooking us. In addition most windows on the western and northern sides of blocks 2 and 3 will overlook my family home.

This is a huge invasion of my family's privacy, and from what I can see the situation is worse for our neighbours further up the terrace. Privacy will be a thing of the past at the rear of our house and our gardens. I bought our house specifically because of the privacy it could provide us. If the proposed development goes ahead as planned their will no privacy and this will have a hugely negative psychological effect on my family and large effect on the value of my property.

2.2 Noise

The peace of my back garden will be shattered by the noise of such a dense development, with residents having balcony access way above us. It is hard to even imagine the disruption this will cause. This for a terrace that already has considerable traffic noise on the Dolphin's Barn Side from the R110.

2.3 Sunlight

The light in St. James's Terrace will be seriously affected, blocks 2 and 3 at current planned height will cause a marked deterioration in light in our house during the winter months, however this will be nothing compared to the effects on numbers 12 and 13 on the terrace under current plans for block 1.

The three houses in Grand Canal View at the end of our terrace have a solar power system in service. The size of block 1 threatens the efficiency and yield of their system. In the current political landscape of climate change and fuel independence such systems should be encouraged and facilitated and not impeded.

2.4 Cycling and pedestrian safety

The proposed main vehicular entrance to the development is on my children's commute to school. We are genuinely scared to think how dangerous this junction will be and feel the developers have not considered their proximity to the bailey Gibson site on the other side. This junction will be very dangerous for cyclists and pedestrians, and I fear for the safety of my kids on the way to school.

The proposed pedestrian and cyclist entrance on James Terrace will cause a big increase in bicycle and pedestrian traffic on our street and I am concerned that there will be accidents due to the proximity to several vehicular exits on our street.

2.5 Parking

The proposal states there will be 106 parking spaces to serve approximately 1000 residents as part of the development. This will mean a flood of extra cars consuming our parking spots on James's Terrace. Given its proximity to the Coombe and James's Hospitals it is already difficult enough to park on our own street, the situation will deteriorate

2.6 Construction safety

The current warehouse structures in the White Heather Industrial Estate have asbestos roofs. The risks associated with the demolition of these warehouses is of great concern to all residents. If this is not done safely clouds of carcinogenic asbestos dust could be released near our houses.

I am concerned about dust and pollution in general during construction. I understand that there may be significant dust and dirt kicked up by construction and that our houses, cars and gardens will be covered in clouds of dust for a period of up to 4 years.

The construction will require significant digging and pile driving will be done to the site as per standard high rise construction practice. Our terrace has houses dating back to the 19th century. Such destructive methods will potentially damage the foundations of our houses as has occurred in the Ceannt Fort estate during digging phases of the new Children's Hospital.

The volume of construction vehicles turning into White Heather and Bailey Gibson construction sites will make that stretch of the South Circular road very hazardous to pedestrians and cyclists including my own children on their way to school. There have been cyclist fatalities at similar construction site entrances for the children's hospital.

2.7 Security

Dolphins Barn has had its issues with anti-social behaviour over the years. My rear garden is adjacent to an industrial park that is shut at night and I rarely have any concerns for intrusion or burglary as a result. Now I find that the rear of property will be openly accessible from the streets at any time. From what I understand of the current plans the rear of the townhouses will form a secluded corner between the northeast most town house and the rear of number 3 St James's terrace. I am concerned that this will attract anti-social behaviour, putting us at risk of theft and intimidation.

2.8 Provision of social housing as part of the development

The developers have opted for the cheapest option in providing social housing, that is to confine all social housing to both blocks 1 and 5 for the sake of reducing management costs. This goes against best practice for mixed type developments where social housing should be "pepper potted" throughout the development to encourage integration and community building. These plans are divisive and anti-community and may lead to future anti-social behaviour.

The build to rent prevalence seems to encourage "vulture fund" ownership of housing in our country. This encourages profiteering at the expense of decent housing. Our fear is that build to rent will be used in the future as a mechanism to outsource social housing. These small 1 bed apartments are designed to maximise profit and are not designed to build communities and to provide the vulnerable, be they those in need of social housing, or young 'transient' workers trying to make ends meet, with their housing needs. I fear that such a high-density development will provide a poor-quality experience to all concerned.

2.9 Effects on existing services

The water pressure on my street and in most parts of Dublin 8 is already notably low and with so many new developments, water pressure will become an even bigger problem for my family and all residents current and new.

Drainage is also problematic on our street with the city council drain regularly blocking in the past. The effects of 300+ units will compound problems for our antiquated drainage system.

3 Request for consideration

3.1 Detailed plans for asbestos removal

I would like to see detailed plans on what asbestos is present and how and when it will be removed. I feel that my health and the health of my young children is at serious risk.

3.2 Reduction of high rise

We would like the max tower sizes here to be reduced to 5 stories and pushed towards the Canal edge where the negative effects on privacy and light can be minimised. This will also preserve solar yield on the roofs of the 3 grand canal terrace houses and allow us to continue with plans to go solar in the near future.

3.3 Removal of overlooking balconies

Orientation of balconies should be altered to avoid overlooking the back of the houses and gardens of St. James's Terrace. This will minimise effects on our privacy.

3.4 I would like the town houses near St. James's Terrace to be shifted further away from the boundary wall of the back garden of number 3 and the main boundary wall of numbers 4-13.

I note a contradiction in the drawings where floor plans show a 6m gap from the townhouse to the rear of the St. James's Terrace back-gardens and the elevations showing a gap of 11m. An additional 5m would be a huge improvement to the privacy and noise impacts on the Terrace. Ideally, I'd like to see a wider gap between the walls of the back garden of number 3 and the end of the north-eastern most Terrace house, currently proposed for 1.5m, a larger gap would have a big positive effect on noise and privacy in our gardens.

3.5 Changes to the mix of housing types

I would like to see change to the mix of housing types to include affordable housing, private family homes and minimal "built to rent". This would have a very positive effect on the future of the development and the community.

3.6 Pepper Potting of social housing throughout development to facilitate community building and not segregation

We all want community and not division. Social housing should not be confined to two blocks so that vulture funds can save money on their minimal societal obligations for management of social housing units.

Yours Sincerely

Rosanna Bravar