

114 Parnell Road

Dublin 12

D12PX36

16th May 2022

To whom it may concern,

I make this submission in respect of the proposed Strategic Housing Development at White Heather Industrial Estate, Dublin 8.

I contend that insufficient justification has been given for the height of Block B3 in the planning documentation submitted.

The visual impact of the 8th and 9th storeys of Block B03 are made clear on verified photomontage views 01, 02, 03, 04, 08, 10, 12, 14, and 16. In several of these views these storeys are the only visual impact on the wider area.

The development height strategy to create a "tower" in the middle of the site does not take sufficient account of the proximity to existing houses on South Circular Road (its receiving context as described in the Development Plan). The taller element does not offer any urban design benefits apart from in one selective 3D view which presents it in a more favourable light by using a camera angle to obscure the western portion of the block and frame the tower carefully, using lower blocks in the foreground (Photomontage View 18). The taller element appears detrimental to the scheme's own urban design clarity when viewed from any other direction. In addition, the 8th and 9th floor plans show that these two storeys contribute only three apartments each to the scheme, six apartments in total – less than 2% of the overall development. The applicant seeks to rely on National Policy Objective 3a and 3b of Project Ireland 2040, but it is difficult to justify a density rationale for these two storeys on this basis, given how few apartments they contribute, and balanced against their disproportionate visual impact and overbearing impact on adjacent properties to the north. At three units per core in a core with two lift shafts, it would also appear to be highly economically disadvantageous for the developer themselves.

I hope the Board will take due account of these comments, which are intended constructively, to enhance the scheme and address some of its detrimental impacts on the locality.

Yours Sincerely,



Stephen Musiol


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