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An Bord Pleanála

Planning Reference: 313278/22

Strategic Housing Development at White Heather Industrial Estate

To whom it may concern,

We make this submission in respect of the proposed Strategic Housing Development on the grounds of White Heather Industrial Estate.

Building Heights

The maximum building height on the site should be 8 stories with other building heights reduced accordingly to provide for a stepping of heights from the perimeter.

These reduced heights will still allow the creation of a high density residential development on the site which we support.

Build-to-Rent Apartments

The proposed residential mix and tenure type proposed in the SHD application does not represent sustainable development, as defined by Dublin City Council, and will have a long-term negative impact on the surrounding area, and will negatively impact on the diversity and growth of the residential community at a local level.

Developments consisting entirely of Build-to-Rent apartment types are unsustainable, both for the new development and the surrounding area, and will negatively impact on the diversity of the residential community at a local level. The proposals must allow for a broad range of household types and sizes, which is required to facilitate the sustainable affordable development of homes in our area.

The cumulative negative impact of Build-to-Rent must be considered in conjunction with the adjoining Bailey Gibson and Player Wills sites, which are also proposed to be exclusively Build-to-Rent. The lower standards of Build-to-Rent apartments will have a significant long term negative impact on the housing needs of the city.

Social Housing / Part V Development

We feel that An Bord Pleanála can begin to take the lead on ensuring that there is a suitable distribution of residents from mixed backgrounds, tenures and incomes across all future residential developments in the city. This should be done by way of condition on all residential schemes in excess of 100 units.

The social housing requirement of this development should not be provided on the site solely in two blocks but should be distributed across the blocks. This ensures 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.

Daylighting Standards

The Daylighting report submitted with the application points to a number of areas that are below the standard required for a development of this scale and quality.

With a site of this size, there is no reason why the overall massing and building layout cannot result in a development that exceeds, and at the very least meets, the daylighting levels required for the public spaces, adjoining neighbours and apartments.

We support the comments of Senator Rebecca Moynihan and Cllr Darragh Moriarty in their submission in relation to Daylighting Standards;

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.