

**Observation on proposed Dwyer Nolan SHD development at Santry Avenue, Dublin 9
(Original Planning Reference: APB 308093-20; Case Reference TA29N.310910)**

This Strategic Housing Development proposes the demolition of the existing building on the site at the junction of Santry Avenue and Swords Road, Dublin 9 and the construction of 350 apartments and associated site works.

I would like to raise an objection on several grounds, as follows:

Premature development

There is lack of forward planning with regard to this, and other developments in the area; an integrated plan for the entire area should have been developed in advance, giving due consideration to the population increase, and the nature of this, to ensure there is a known services requirement for the area. The *Bus Connects* programme should have been approved, funded and substantially completed before any proposed development. The main services amenity, the Omni Centre, should have been developed as a pedestrian-focused town centre around which higher density development then occurred.

Planning

No consideration has been given to mass and scaling and topography and there are huge implications with regard to environmental and visual impact. The design is misleading, and the application pictures do not accurately reflect the proposed development. Furthermore, this type of design has already been turned down as phase two of the Santry Place development, where concerns were expressed about overdevelopment and close proximity to recently-completed residential development.¹ The proposed development is adjacent to Santry Place and surely will have an overbearing effect on neighbouring residential units. Furthermore, the proposed development makes use of the Santry Place exit; this could not have been part of the original planning grant and it would seem a sleight of hand to use it for this development.

¹ Reason 1

Having regard to the proposed height, scale and bulk of Block F, its architectural articulation of long and uninterrupted walls of glazing and metal panels, its orientation and close proximity to recently-completed residential development immediately adjoining to the east in Santry Place and the backland location of the application site, it has not been satisfactorily demonstrated to the planning authority that the proposed development would make a positive contribution to the urban neighbourhood or successfully integrate into the area. The proposed development would provide for a poor outlook from residential units in Block D and would have an overbearing effect on these proposed residential units and on those newly-completed residential units in Santry Place. The proposal constitutes overdevelopment of the site, would provide for a substandard quality of residential amenity for future occupiers of the scheme and would seriously injure the visual and residential amenities of properties in the vicinity. The proposal would therefore, be contrary to Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) and to the proper planning and sustainable development of the area.

Reason 2

Having regard to the height, scale and massing of the proposed blocks enclosing the communal amenity courtyard, the architectural articulation of long and uninterrupted walls of glazing and metal panels on Block E and F, coupled with the limited separation distances between the blocks and the resulting constrained width of the communal amenity courtyard, the proposed development would not provide for quality communal amenity space for the benefit of future occupiers of the proposed scheme by reason of overbearing effect of the blocks, poor outlook from the courtyard and potential for excessive overshadowing of the amenity courtyard. The proposed development would, therefore, be contrary to the Design Standards for New Apartments - Guidelines for Planning Authorities (December 2020) and to the proper planning and sustainable development of the area.

Zoning

The area is zoned Z3 (neighbourhood centre which allows for *some* housing). This development is 90%+ housing which is completely out of kilter with its zoning. This is the fourth such development in a small area, completely changing the dynamic of the locality without a plan and with no accountability. As such, there is material contravention of a development plan; while a development instance like this would be expected to be exceptional; in Santry it is in fact systemic. In March 2020 Dublin City Council Managers withdrew the proposal to rezone two industrial lands in Santry. The site on Santry Avenue which is adjacent to the proposed development and a site on Shanowen Rd. During the public consultation process councillors and local residents raised concerns over the transport infrastructure not being able to sustainably more residents and the capacity of the local schools and local services such as GP's and Crèche's. The Department of Education in their submission noted that the rezoning could potentially generate a significant educational requirement in Santry area and as such an assessment would need to be taken on the capacity of existing schools.

Density

I have concerns relating to the density of building on the site (350 apartments on 1.6Ha, including a 14-storey building which is almost as high as Liberty Hall and bulkier). A development of this nature will result in an increase in population, with resultant impacts on traffic and the environment.

Environmental and Visual Impact

The proposed development will comprise 4 buildings ranging from seven to 14 storeys high. The corner building, closest to Santry Villas is the 14-storey building, which is described in the application as a *gateway building which announces the entrance to the city* and provides a *positive contribution to the city's skyline*. I would argue that, conversely, it represents an eyesore that towers above the nearby houses. The upper floors will most definitely create a visual intrusion above the existing trees along Santry Road, Santry Demesne and the green at top of Santry Villas. An Environmental Impact Assessment Report submitted by Armstrong Fenton Associates as part of the development application considers this impact to be *moderate, negative and long term*. I would argue that the impact will in fact be *high) negative and permanent* from the point of view of Santry Villas residents, particularly those residents whose houses face the green. A building of this height cannot be disguised by the planting of trees and is not in keeping with the local landscape.

2-3 years ago, this part of Santry was a low-rise area, but with other developments at Swiss Cottage, and Santry Place, and additional proposals further down the road beside the Omni, the character and look of the neighbourhood is changing beyond recognition. It is planned to add four more high-rise buildings in an area already overcrowded with new apartment complexes. This application should not be considered in isolation; thought must also be given to the overall impact of multiple developments in this area, which together will have negative and irreversible repercussions for Santry Village.

Bats

I note that a Bat Survey Report was undertaken on the development site at the junction of Santry Avenue and Swords Road on April 28th 2021 which did not detect bat activity on site. However, there is local knowledge of at least one bat colony nearby - across the junction on Church Lane in the trees in the churchyard of St. Pappan's Church. Myself and other neighbours on Santry Villas have sighted them on several occasions, and I would be concerned about the impact on the bats arising from the proposed development - their flight path is likely to be obstructed by the development and it is my opinion that a more comprehensive study is needed.

Community

The proposed development does not assist in building a community. It is not part of an overall plan for the area, and it diminishes the local heritage of the area to the point that only St Pappan's Church and the green at Santry Villas remain.

Infrastructure

There are not enough facilities or amenities in Santry to adequately serve the proposed development - for example there is no medical centre, and GP capacity would be affected by a surge in the local population. There has been no provision for additional school places which will result from the proposed development. Most primary schools are at capacity at the moment - where will the children attend school? While there is a park, there is a lack of other leisure facilities such as a library or swimming pool.

Transport & Traffic

The proposed development will create an untenable strain on existing transport and travel. 350 apartments are proposed in this development, which will result in an increase in the local population of more than 1,000 people. Whether residents have cars or use the bus, there will be an impact on traffic and transport for locals.

- **Buses**

Existing transport is poor as it stands. There is no bus service originating in Santry and as a result, buses are often full by the time they reach Santry. I work in town and had to stop taking the bus as it was too unreliable at peak times. I needed to be in work for 9am but was constantly frustrated with buses not stopping due to fact that they were already full - buses on the route originate in Skerries, Swords or Dublin Airport and were often full by the time they got to Santry. At this time of day, passengers are mostly made up of people going into town for work or travelling to school in Whitehall and Drumcondra (e.g. Margaret Aylward, Dominican College, Scoil Chaitriona, St. Aidan's and Clonturk Community College are just some of the secondary schools on the bus route, and there are numerous primary schools on top of this.)

- **Traffic Congestion**

As it is, traffic is regularly congested in the local area, with particular junction stress at Swords Road and Santry Avenue. In the mornings, traffic coming down Santry Avenue has tailbacks to Aldi, and in the evenings, traffic coming out of town extends from Beaumont Shantalla to this junction. At weekends, the junction is clogged up with traffic heading to and from the Omni Shopping Centre. The proposed development is along a main commuting route (Coolock Lane through to Santry Avenue) - already cars turn into Church Lane at the top of Santry Villas to try to skip the long queue at the traffic lights; the addition of 200+ car park spaces with other proposed and built new developments will result in more local traffic, Worsening the already bad traffic conditions and creating complete chaos at this junction. Pedestrians and cyclists In addition, no consideration has been given to an overall plan for pedestrian and cycling movements within the area to access existing amenities.

Water level and Flooding

There is a known history of flooding in the area (Swords Road from Santry Avenue to Magenta). An underground river network in the area means there is a high water base which has required pumps to be installed to prevent basement flooding. Furthermore, installing additional high-rise buildings at the Heaton Buckley site in aggregation with Swiss Cottage and Santry Place will add hugely to the water collection via rainfall and dispersion in a very small area. This will only exacerbate the existing problems.

Other concerns regarding high-rise buildings

I have several other concerns in relation to this type of development, as follows:

- **Fire hazard**
High-rise buildings represent a fire hazard, as demonstrated through the horror of the Grenfell high-rise fire. The Dublin Fire brigade is not accustomed to working in a predominantly high-rise environment and I would be concerned about the safety of the fire fighters and also the capacity of Dublin Fire Brigade to deal with such fires. There was a fire in the Metro Hotel at the other end of Santry Avenue in March 2018, and the hotel and apartment building was forced to close after the 10th and 13th floors were gutted by fire. I do not want the worry of a similar occurrence at this end of the Avenue.
- **Air Quality**
High-rise development contributes to development of stagnant air². To my knowledge, air quality is not monitored in the immediate area, even though there are already quality concerns because of proximity to the MSO tunnel exit. Another high-rise development will exacerbate this risk.
- **Mental Health**
The proposed development consists of small apartments for the most part - of the 350 apartments, only 19 will be 3-bed. There will be 113 1-bed and 218 2-bed apartments. These apartments will be too small for buyers/renters hoping to raise a family, which means that many residents will have to move on and won't be able to have a permanent home here. High-rise apartment living has been known to contribute adversely to mental health! - small apartments are stressful environments in which to live and cramped conditions contribute to isolation through absence of shared space.

I hope you will consider the above observations/objections and refuse the proposed development.

Submitted by:

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² The Impact of High-Rise Buildings on the living Environment: Botir Giyasov , Irina Giyasova

³ High-Rise Apartments and Urban Mental Health-Historical and Contemporary Views by Danica-Lea Larcombe, Eddie van Etten, Alan Logan, Susan L. Prescott and Pierre Horwitz