



Cllr Alison Gilliland 37 Maryfield Drive Artane D05K153

4 August 2022

Submission with regard to SHD0014/22 - ABP Reference: TA29N.314019 at junction of Santry Avenue and Swords Road, Santry, Dublin 9 (Chadwicks Builders' Providers) for 350 apartments, retail/commercial/GP use and community uses in 4 no. buildings of 7 to 14 storeys over basement parking.

A chara,

I have serious reservations about the sustainability of the proposed development detailed in this application for 350 apartments, retail/commercial/GP use and community uses in 4 no. buildings of 7 to 14 storeys over basement parking at the junction of Santry Avenue and Swords Road, Santry, Dublin 9, the current Chadwicks Builders' Providers. By sustainability I mean the ability of current Santry social infrastructure to support the significant growth in residential development in both the immediate area and the wider Santry area.

#### Zoning

This site is zoned Z3 to provide and improve neighbourhood facilities. Indeed most of the Z3 zoning in this immediate area has been used for residential use with only ground level units being used for what would be deemed neighbourhood facilities - primarily commercial units. While this application includes commercial units and a small GP facility with 4 treatment rooms it could have responded more favourably to the actual neighbourhood needs particularly with regard to health and education facilities - a more creative architectural design could have incorporated a much needed 8 teacher single stream primary school and a primary care health centre into this proposal.

The business on the site, Chadwicks, currently employs 24 persons and serves local builders and construction businesses. While these persons will probably be relocated to the Chadwicks providers in Coolock and Glasnevin the closing of this business does constitute a loss of a particular type of employment opportunities and business footfall in the local area. While the commercial units and GP rooms will provide an equivalent number of long term employment opportunities I would argue that given the Z3 zoning and the need to support a sustainable neighbourhood the proposal should include a greater number of units dedicated to a diversity of employment opportunities - an enterprise centre is allowable under Z3 while office space and a veterinary surgery are open for consideration.

I would argue that an over concentration of high density residential units on the entirety of this site is a missed opportunity to more appropriately maximise the Z3 zoning and support sustainable development needs in the Santry area.

## Height

As indicated on the planning application the proposed development materially contravenes the current Dublin City Development Plan which supports heights up to 16m - heights in this application range from 22.9m (7 storeys/ Blocks B & G) to 48.3m (14 storeys / Block A). The scale of these heights are completely out of character with the local community. Nearby built developments are of 7 storeys in height whereas this development increases that to 10 and 14 storeys high. Rather than a feature, the 14 storey gateway/landmark building overwhelms the entrance to Santry, which is technically a village. I also question the impact the higher blocks will have on access to light for units on the ground and lower levels around them and on both the light into and the views from the more internal blocks (C/D & E/F). Overall the heights in question will detract from the sense of community and place making as opposed to contributing to them and will visually impinge on and disrupt the aesthetic as one enters Santry from the north.

## Social infrastructure

As noted above there is a significant lack of health and education facilities in the Santry area to support the growing number of residents in the immediate and wider Santry area. This proposal brings to a total of 999 new residential units in the immediate area (ie within a radius of 250m) within the last 3/4 years. Therefore, a minimum of 2,000 and a possible 3,000 new residents including a possible 1,000 children are moving into a village area that has not gained any additional health, education or employment amenities or road/rail/cycling infrastructure in the last 20 years.

Bus connects will provide more frequent bus north/south connectivity between Swords and the city centre within the next 5/6 years along with a similar enhancement in north/south cycling infrastructure. However, there are no plans at present for the widening of Santry Avenue, a heavily congested, single carriageway with no safe cycling infrastructure and one connecting bus route, the N6 from Donaghmede to Finglas. The Northwood Metro North stop is at least a 15 minute walk through Santry Park but is many years away.

# Sustainable climate friendly development

The upcoming Dublin City Development Plan 2022 - 2028 places a key focus on the concept of the 15 minute city - whereby key essential services and amenities, including community amenities are accessible within a 15 minute walk, cycle or public transport and therefore allow the private car to be parked, carbon emissions to reduce and air quality to improve.

This is not the case for the individuals and families that would live in this development. Of particular note is the lack of primary school places or primary care for the majority of new residents - basically any new primary school age child to the local area, a possible 200 - 500 in this development along with a possible additional 600 in this immediate area, will have to travel out of Santry by car to go to school as will the majority of those seeking medical help. This goes against the Dublin climate action plan of adaptation and mitigation and negatively impacts on our ability to reach our climate targets as well as negatively impacting on the quality of life and place making opportunities for new and existing Santry residents.

### Conclusion

It is my view that this application in its current form should be rejected:

- it fails to contribute to the employment and significant education and primary care needs of the local community allowable under Z3 zoning
- it fails to assimilate into the local character given its excessive height;
- · it overwhelms the local community aspect physically and visually in its mass and height;
- it overloads the social infrastructure and amenities and will not provide a high quality of living for its future residents and dilute access to current amenities for current residents

Kind Regards,

Cllr Alison Gilliland