

Caroline Molloy

19 Oak Green,

Royal Oak,

Santry,

Dublin 9

<https://www.pleanala.ie/en-ie/case/310910-21>

I am writing an observation to the O'Dwyer Nolan Planning Application

APB-310910-21 at Buckley's Site at Santry Lane/Swords Road, I believe this planning application should not go ahead on the following grounds.

#### Public Transport

- No existing public transport originates in Santry, all buses that go through Santry come from Skerries/Swords/Dublin Airport and are mostly full or with standing room only by the time they reach Santry. My son has to be at the bus stop at Northwood by 7.30am in order to be in work by 9am, if he leaves any later the buses are full with school children.
- Sppr3 states that an SHD can be built where an existing efficient transport system is in place at the time of building, such as Dart/Luas. The Swords/Santry bus corridor due to be implemented by TFI is still in the planning process. Mr Justice Denis McDonald refused planning permission for the SHD at Glenhill because there was no proper public transport link in place.

#### Infrastructure

- The application lists 19 practices in health and wellbeing of these 19 only 4 are Doctors and all have a waiting list. I [REDACTED] have to travel to Ardara to [REDACTED]
- There are 10 Post Primary Schools listed none have an address in Santry and for the Majority you have to put your child's name down when they start primary school in order to secure a place. This has also a serious impact on the traffic and transport system as all of these children have to be driven or get the bus to school.

- There are no youth services as Santry Community Resource Centre (self-funded by the community) is at full capacity and has no room for anymore activities.
- When DCC were trying to rezone the Shanowen and Santry Lands the Department of education wrote to DCC to say there was no plan to build schools in Santry but that other schools in the immediate area were full.

### Water Level

- Santry is well known for flooding over the years especially the area in front of the proposed new building. Santry Demesne was a flood plain and all the building in recent times has caused the water to disperse elsewhere.
- In 2017 DCC had to install water pumps in the basement of Santry Community Resource Centre as it had a serious flood because of all the building going on in the area.
- Below is a picture of a flood in Santry Demesne in 2019, this is not the lake.

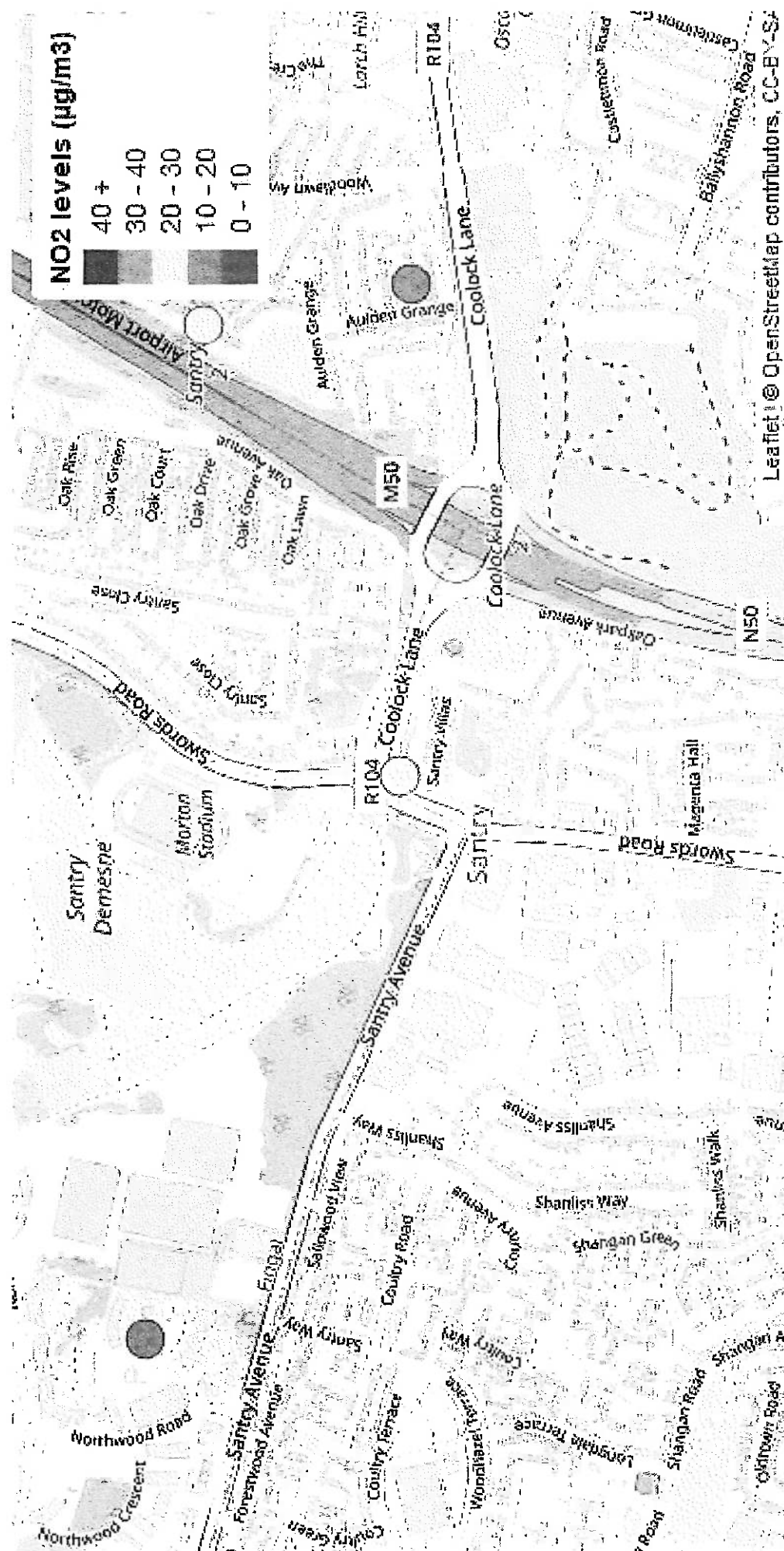


### Junction Stress

- Traffic already extends from Beaumont/ Shantalla to this junction at peak times
- Santry Avenue traffic extends beyond Aldi and from Coolock lane to this site coming from the M1.
- Bus connects intends to reduce this junction to one lane both ways instead of the one lane and slip road which is now in place. This junction up as far as Aldi needs to be widened and now if this development goes ahead it will add another 200 cars to this route which is at breaking point at this stage.

### Environmental Impact

- With proximity to the Port tunnel exit and Dublin Airport, Santry's air quality is already very poor.
- High rise development contributes to the development of Stagnant air (the impact of High-Rise building on the living environment Botir Giyasov, Irina Giyasova)
- In a recent study by Clean Air Santry came up as one of the areas of the city with the most NO2 levels in the city. Please see attached study at end of observation
- The recent developments at Santry Place, Swiss cottage and Milliners square have added to the dust and noise levels.



[illegible]

and not a definitive measurement of NO<sub>2</sub>.

**NO<sub>2</sub> levels (µg/m<sup>3</sup>)**

|         |
|---------|
| 40 +    |
| 30 - 40 |
| 20 - 30 |
| 10 - 20 |
| 0 - 10  |

For this reason, the result cannot be compared directly with the EU Air Quality Directive's NO<sub>2</sub> annual average limit of 40 µg/m<sup>3</sup> or the recently updated World Health Organisation's recommendation that NO<sub>2</sub> levels do not exceed an average of 10 µg/m<sup>3</sup> annually. However, the recommended values in these guidelines can be kept in mind as indicators as to where your result lies.

**What is being done and what can be done to reduce NO<sub>2</sub>?**

These actions include:

- Building more and safer cycle lanes and footpaths
- Investing in clean public transport, and exploring low emission zones.
- Plans to implement more examples of the 15-minute city development concept<sup>1</sup>.

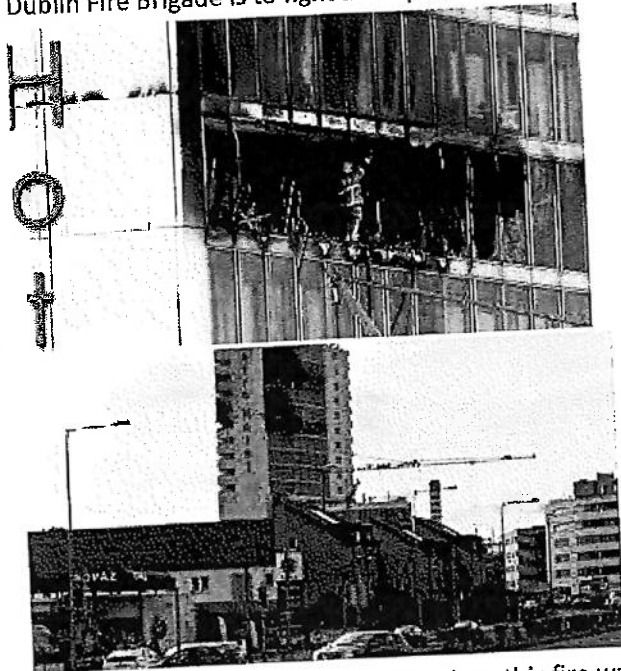
**YOU can** make an immediate difference by:  
 1. **Check the tires** before taking the car.

- Thinking twice before taking the car. One less car journey a day or week can make a big difference!
- Using public transport more often and walking or cycling when possible.
- Supporting Local Authority efforts to build more cycle lanes and low-emission zones.

<sup>1</sup> A 15-minute city/neighbourhood is a neighbourhood in which you can access all of your most basic, day-to-day needs within a 15-minute walk of your home. It is also sometimes called a complete neighbourhood.

## Fire

- The Grenfell fire showed the horror of high rise fire
- But also the Metro Hotel fire in March 2018 showed us how unprepared and ill equipped Dublin Fire Brigade is to fight a fire past the height of an 8 story building.



- Both of these pictures show how serious this fire was and how lucky the community below the high-rise building were.

## Zoning

- The area is zoned Z3 neighbourhood centre which allows for some housing
- This development is for 90% + housing which is completely off kilter with its zoning
- This is the forth such development in the area completely changing the dynamic of the area with a plan and no accountability.
- Material contravention of a development plan would be expected to be exceptional, in Santry it is in fact systemic and in reality it is An Bord Planala's plan for the area

## Premature development

- Omni centre should have been developed as a pedestrian focussed town centre around which higher density development the occurred
- The bus connects programme should be approved and funded and substantially completed before the proposed development
- An integrated plan for the entire area should be developed including all contemplated population increase and the nature of this to ensure there is a known services requirement for the area

## Planning

- Mass scaling and topography- the development is not the same as the picture used of the proposed development
- This type of design has already been turned down as phase two of Santry Place, DCC council refused planning permission for the 10 storey block in the middle of the development ref 2543/21
- The use of Santry Place exit for the proposed development surely this was not part of the original planning grant,- sleight of hand to use it for this development



Buildings at Santry Place

## Community

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



St Pappan's church of Ireland