

An Bord Pleanála  
64 Marlborough St.  
Dublin 1  
D01V902

Date/Dáta : 12-Jul-2022

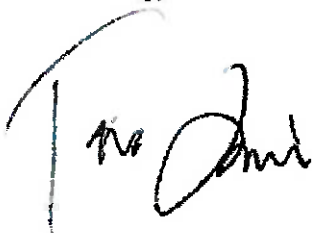
Re: Planning Ref.: 31401922

Applicant: STRATEGIC HOUSING DEVELOPMENT Dwyer Nolan Developments Ltd.

Dear Sir/Madam,

In the case of this planning application, Transport Infrastructure Ireland has no observations to make.  
Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

Yours faithfully,



on behalf of  
Land Use Planning Unit

*\*Note: In accordance with the provisions of section 13 of the Roads Act 2015, Transport Infrastructure Ireland (TII) is the operational name of the National Roads Authority with effect from 1 August 2015.*

*Due to continued restrictions associated with COVID-19 all planning application referral documentation, including applications, submission acknowledgments, further information notifications and decisions should be notified electronically to TII at [landuseplanning@tii.ie](mailto:landuseplanning@tii.ie). TII would appreciate your Authority's assistance on this matter.*

*Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
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**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.<sup>1</sup> 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.

<sup>1</sup> 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 *highly 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 28<sup>th</sup> 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 10<sup>th</sup> and 13<sup>th</sup> 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 air<sup>2</sup>. 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:

**NAME** Sheila Fields

**ADDRESS** 14 Santry Villas, Santry, Dublin 9

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

<sup>3</sup> 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

Santry Forum observation on the SHD application for the site at Chadwicks on the junction of Swords Road and Santry Avenue Dublin 9.

**The case reference is: TA29N.314019**

## Introduction

Santry Forum was constituted as an umbrella group for residents of the Santry area in 2019. Its aim is to represent the interests of the community. Since foundation, SF has engaged with the community, public representatives and DCC on the proposed rezoning of lands at Shanowen Road, supported a judicial review on the proposed Omni Living Development and is currently engaged in challenging the scale and massing of the proposed development at the site of Chadwick's. The group is not anti-development. What it seeks is meaningful community input into how our area is developed. We want to see a thriving and growing community in the area. Growing population should after all ensure a better mix of services and amenities for the benefit of all. We have strongly advocated for a local area development plan so that we are not subjected to piecemeal large scale SHD developments in an unstructured and unplanned fashion.

**Members of the community have identified the issues below to us:**

### **Public Transport**

- Existing transport is poor as buses often full by the time they reach Santry
- No bus service originating in Santry to ensure capacity for local population
- With this development, and assuming an occupancy of 1 person per bedroom, 66% will not be able to have a car parking space (or get public transport!)

### **Fire**

- Grenfell Tower showed the horror of high rise fire
- Capacity of Dublin Fire Brigade to deal with such fires

- Development in breach of National Planning Regulations

### **Environmental Impact**

- Air quality not monitored in the immediate area
- High rise development contributes to development of stagnant air
- Proximity to the M50 tunnel exit exacerbates this risk

### **Mental Health**

- Small apartments are stressful environments in which to live
- Apartments contribute to isolation through absence of shared space
- High rise apartment living contributes adversely to mental health - no supports proposed

### **Junction stress – Swords Road and Santry Avenue**

- Traffic already extends from Beaumont Shantalla to this junction at peak times
- Santry Avenue traffic extends to Aldi
- Coolock lane through to Santry Avenue is a main commuting route
- Addition of 209 car park spaces with other proposed and built new developments will create complete chaos at this junction
- Currently there is room on Santry Avenue to widen the road on the south side (as currently it is taken up with car parking spaces – no structures, close to road, as far west as the Aldi building) Should this development be approved the chance to widen this very busy road is gone.

### **Bats**

- Bats colony at St Pappan's church
- Flight path likely to be obstructed by development
- Comprehensive study needed

### **Water level**

- Swords Road from Santry Avenue to Magenta has a known history of flooding and remains evident today
- Underground river net work in the area means there is a high water base which has required pumps to be installed to prevent basement flooding
- Installing such mass at this site in aggregation with Swiss Cottage and Santry Place adds hugely to the water collection via rainfall and dispersion in a very small area



### **Infrastructure**

- No consideration to an overall plan for pedestrian and cycling movements within the area to access exiting amenities
- No library, GP capacity, swimming pool
- No provision for school places

### **Premature development**

- Omni centre should have been developed as a pedestrian focussed town centre around which higher density development then occurred
- The bus connects programme should be approved 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

### **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 fifth such development/proposed development in a small area completely changing the dynamic of the area without a plan and no accountability
- Not taking into account the other major developments happening just 2 KM up the road in Northwood/Gulliver's park.

### **Material contravention of a development plan**

- would be expected to be exceptional, in Santry it is in fact systemic
- in reality this is An Bord Pleanála's plan for the area

### **Aggregation**

- No reference in the proposal to the aggregate development in the area
- How can the proposed development be assessed without consideration of this
- This approach implies no limits on aggregate development in the area in terms of suburban density in a low rise environment

- No accounting to the population explosion in Northwood/Gullivers' park nearby that also rely on the limited services and amenities in the area

### **Community**

- 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 and the green at Santry Villas remain
- It is the moral duty of any statutory body to look after the best interest of the population in general, and neither overextending a settled community or allowing reduced standards of building and amenities/infrastructures to force new tenants into unhealthy situations are a good decision.

### **Planning**

- Mass and scaling and topography – the development is not the same as picture used of the proposed development
- This type of design has already been turned down as phase two of the Santry Place development
- 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

### **Conclusion**

- The community are at wits end to understand the thought process of bodies permitting these massive developments without
  - Insisting on amenities/facilities to accompany the developments
  - Ensuring the developments will not contribute to bad mental health of the occupants, as reported to be true by many and various reports
  - Understanding why the Towers in Ballymun – just up the road – were demolished
  - Insisting on sufficient living space and storage space that an average family require
  - Letting the developers make a profit while still giving future tenants/residents dignity in their environment

1000 1000 1000 1000

I have included the fee for an oral hearing on this matter. Please let me know the date for this oral hearing.

**Anne O' Rourke**

Secretary, Santry Forum

Santry Community Resource Centre, Dromville Court, Coolock Lane, Dublin 9

Email: 

Santry Community Assoc

Santry Community Resource Centre

Domville Court

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 have to travel to Aghlin for my son's doctor and cannot get one in Santry.~~
- 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 cause 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 Demense in 2019 , this is not the lake.



### Junction Stress

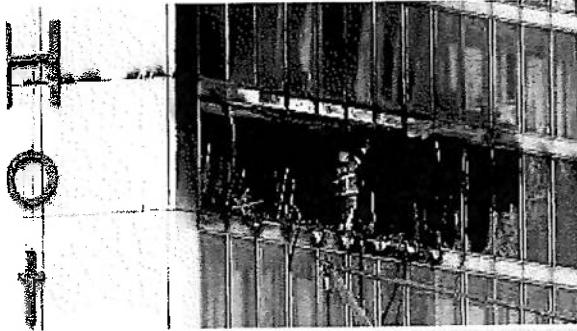
- Traffic already extends from Beaumont/ Shantalla to this junction at peak times
- Santry Avenue traffic extends beyond Aldi and from Coolock lane to this site coming from the M1.
- Bus connects intends to reduce this junction to one lane both ways instead of the one lane and slip road which is now 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 Giasov, Irina Giasova)
- In a recent study by Clean Air Santry came up as one 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.

## 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

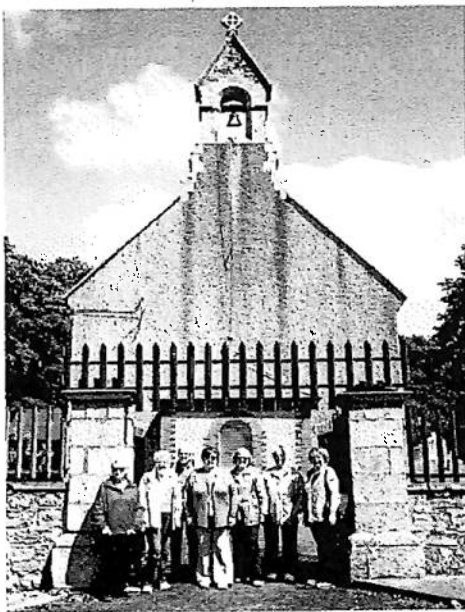
- Mass scaling and topography- the development is not the same as the picture used of the proposed development
- This type of design has already been turned down as phase two of Santry Place, DCC council refused planning permission for the 10 storey block in the middle of the development ref 2543/21
- 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

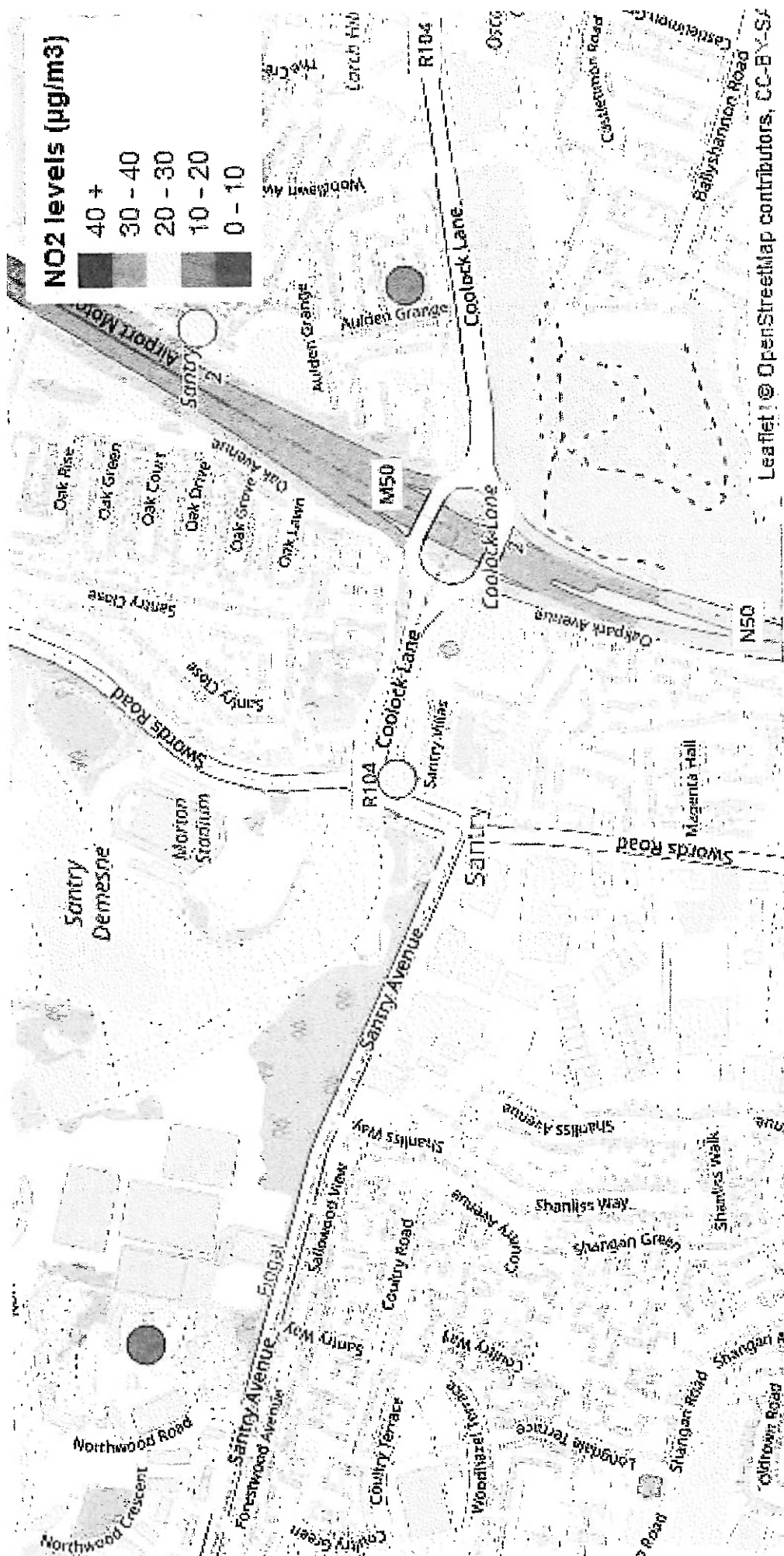
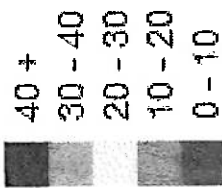
- The proposed development does not assist in building a community
- It is not part of an overall plan
- It diminishes the heritage of the area to the point that only St Pappan's Church the the green at Santry Villas remain.



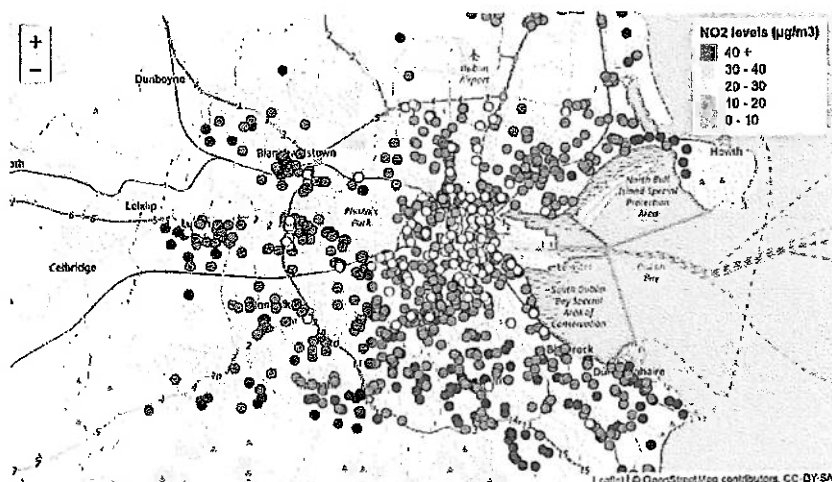
St Pappan's church of Ireland



# NO2 levels (µg/m3)



## Understanding Your Results



Your result is an indication of the level of NO<sub>2</sub> measured at your property over a 4-week period in October/November 2021. NO<sub>2</sub> levels can vary considerably over the year with changing traffic volumes and weather conditions. Therefore, it is best to view your results as a "snapshot", representative of the NO<sub>2</sub> levels near your property during that month and not a definitive measurement of NO<sub>2</sub>.

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.

Let's remember that **the lower the level of NO<sub>2</sub>, the better for everyone's health.** Fortunately, there are **many ongoing initiatives** in place to improve air quality in Dublin and there are actions you can take to help too!

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

The four Dublin Local Authorities, the EPA, and the government have adopted several policy measures including the Climate Action Plan (2021), Dublin's Air Quality Action Plan (2022), and the New National Investment Framework for Transport in Ireland (2021) which all comprise actions that will help reduce levels of NO<sub>2</sub> across the country.

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:

- 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.

I wish to object to the rezoning of the Santry Avenue SHD application (Case ref No:TA29N.314019) for the following reasons:

1. Current building density is being increased in the area with a lack of related physical infrastructure - cycle paths, footpaths, roads, schools and creches.

While this is a 'Strategic' Housing development there appears to be little strategy about developing the local community to go with it. This is the main reason for my objection.

I have no difficulty with increased housing but there has to be infrastructure to support the increased population in the area.

2. There is no plan for the provision of the required social infrastructure - community centre, scout hall, youth club, all weather sports facility, library etc.

3. The lack of employment opportunities in the area continues, as businesses are closed down in favour of residential development. This undermines the 15 min city concept promoted by the Council.

4. There appears to be no consideration of the impact on vehicular traffic in Santry that the increased population will inevitably have.

7. We need a Local Area Plan to integrate social and physical infrastructure with appropriate residential and commercial developments.

8. I am in favour of mixed and diverse housing solutions that form part of a self-sustaining community and support a 15 minute city.

Thank you,  
Robert Olwill,  
White Oaks,  
Swords Rd,  
Santry,  
Dublin 9  
D09 Y5X2

Observation on the application of development at Swords Road junction with Santry Avenue  
An Bord Pleanála case reference: TA29N 310910

Here are the points I want to make an observation on:

- Currently in Santry, and espically on Santry Avenue, the traffic is horrendous – implying it cannot take another potential 209 vehicles
- If this development goes ahead it rules out the possibility of widening Santry Avenue to the south
- Most buses passing through Santry are full at peak times and none start their journey in Santry
- Santry does not have any type of metro or dedicated bus service to cater for the influx of the increased population due to this development and all the others that have been approved or are pending.
- Nearby in recent years there was a fire in the a high rise building and the Fire Service did not have the capacity to deal with it. The capacity of the Fire Service in relation to fighting fires in developments this high has not changed.
- The occupants of a building of this height so close to Dublin Airport will surely be affected by aircraft fumes
- High rise living has been proven to contribute to adverse mental health
- Apartments (with long lonely corridors) contribute to isolation
- Bats use the Santry Demesne park – will they be affected by this development (i.e. have independent studies been carried out?)
- On the Swords Road section, at this site, there is often flooding
- Where will all these new residents work ? (any light industrial areas are going to residential developments)
- Will this contribute to the 15 minute city?
- The development needs not just a GP clinic but a clinic that could support many GPs - as there is a mass shortage and waiting lists in the locality
- Are there plans for a primary school in the near future as current schools are over subscribed?
- All of the facilities/amenities (schools, doctors, libraries, creches, youth clubs, community centers, etc.,) mentioned and required due to the MANY developments recently within 2 KM radius of this site
- It is shameful that the standards do not adhere to the Dublin City Development Plan.

- I would not like to have to reside in one of these high rise apartments, would you?? Just think of the implications of such high living
- There are many examples of sustainable developments of similar density without the need for 10 to 14 stories (the developers still are able to make their profit, and that is fine).
- I do not have any degrees in any aspect of town planning but I cannot see how this is good for any community, either the current residents of Santry or the future residents of Santry

Due to the above reasons and others, I respectfully request that this application be rejected until the citizens of Santry, Dublin City Council, Fingal Council and Government create a viable and sustainable plan for the area.

This is the same observation as a colloque submitted. As we both have the same views I did not see the point of editing to just look different.

Regards  
Pauline

Pauline Ebbs  
42 Oak Grove,  
Royal Oak,  
Santry  
Dublin 9

~~0800 123 456 789~~

Submission to the ABP

Aug 2022. **BORD PLEANÁLA**  
LDG- 053805-22  
ABP- \_\_\_\_\_  
02 AUG 2022  
Fee- € 20 Type: cancel  
Time: 15.05 By: hand

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin D01V902.

Re: Planning applications Reference APB 308093-20.  
Case reference TA29N.310910.

I Patrick Fagan, 16 Lorcan Drive, Santry, Dublin D09T384.

*I wish to make the following Submission/Observations, of Santry Avenue SHD application/Dwyer Nolan Developments Ltd.*

**Environmental Impact Assessment Report. (EIAR)**

1.1.4 To provide for and improve neighbourhood facilities.

**This is a aspirational statement;**

- (a) This development when completed will be under the control of a management agency.
- (b) There are already anti social behaviour in adjacent residential apartments, due to poor response from the management agency.
- (c) Insufficient space provided in the commercial/retail measurements to provide facilities, for quality of living in the proposed development.
- (d) It fails to take into account the lack of facilities in the Fingal County Council area of Northwood/Cedarwood/Swift Square, the lack of facilities in this area overflows into Santry. Dublin City Council. (DCC)

**2.2.11. Guidelines for Planning Authorities for Child Care facilities (2001)**

- (a) The measurements in the drawings are insufficient to provide 20 Childcare spaces for every 75 new residents dwellings. (page 39/40)
- (b) There is only 1 School that is within 15 minutes walking distance.(CDP)
- (c) There are no primary or secondary schools in Santry all the schools in the surrounding areas are full and are well over 15 minutes walking distance. (CDP)

**Policy QH1.** Dublin City Council refused to undertake a Local area development plan for Santry, without it, the sustainable residential development in Santry is flawed. (CDP)

**Policy QH6.** There are no Schools, no Library, no Health Clinic, no RailTransport, no Youth Centre, and no Civic Centre in Santry. The proposed development plan will diminish the realm of Saint Pappins Church and the Holy Well. (CDP)

**Policy QH9.** There is no Development Plan for Santry. therefore, agreed phasing programme to ensure that suitable physical social and community infrastructure is provided in tandem with residential development and that substantial infrastructure is available to initial occupiers. This policy cannot be implemented until there is a Local area Development Plan for Santry. (CDP)

**Policy SC10.** By removing Commercial/Industrial business and other key employments from Santry it contradicts the said policy as it fails to support the hierarchy of suburban urban villages.(CDP)

**Policy QH11.** To avoid Anti-Social behaviour, control of completed development must be given to Authorised Authorities and not to Management Agencies. (CDP)

### **3.10 Access & Egress.**

The Swords Road Egress/Access from the site/apartments is causing problems due to the lay-out at the entrance to Santry Place.

**Figure 3.8** Mobility Management Plan omit to indicate the junction at Santry Place, also fails to indicate the new development adjacent to it.

**3.4.2** Omits to recognise the dangers for pedestrians crossing the Coolock Roundabout on the Oscar Traynor Road, numerous accident occurred in this area.

### **Table 4.4 page 80.**

The recent census indicate, that the population in Santry has increased. If all the planning applications submitted to ABP for Santry is approved, the population of Santry would increase by 10,000, there are no facilities to cater for that growth in Santry.

#### **4.8 Interactions.**

The increase in population has result in increased traffic. Numerous reports of traffic congestion from the N1 at Whitehall Church onto the slip road to the R132 up to Coolock junction from Monday to Saturday between the hours of 08:30 to 10:30.

#### **Human Health. Page 87.**

***The impact will be negative, short-term, significant and localised.***

The health of adjacent residents in Burnside, Santry Villas and Magenta Crescent is being ignored in this report.

The high volume of HGVs servicing this development is concerning due to the particulates matter pm10 and pm 2.5 emitted from the HGVs.

#### **Human Health. Page 90.**

***The changes in the area will have a positive impact.***  
This statement is an aspiration.

#### **4.10. Cumulative Impacts.**

The impacts of the proposed development will have a devastating effect on the wildlife in Santry Demesne due to the height and spaces between the proposed buildings, the recent development of the Swiss Cottage and Dwyer Nolan buildings have created a wind tunnel, the effect can be felt when walking on the Swords Road.

The space between the proposed buildings and the direction there are arranged will create a wind funnel/vortex, it will effect the habitat in Santry Demesne which is only 25 meters from the proposed development.

The effects will also come from the lights and echoing noises emitted from the proposed development, it will effect also the flora and fauna in the Demesne.

The wind funnel/vortex created by the spaces between the buildings will effect the matured trees by scorching the leaves, eventually killing the trees and effecting the wildlife habitat.



The height of the buildings gives rise to be concerned, the height traps air pollutions.

<https://doi.org/10.1051/03scort/20183301045>.

There is concerns for safety due to the proposed height of the buildings, which are adjacent to Runway 16/34 flight path and could be a hazard for aircrafts making their approach to land. Early in 1990 a Jumbo Jet crashed into a high building in Holland when attempting to land.

#### **5.1.1 Overview and Aims; Appropriate Assessment (AA) Proposed Natural Heritage Areas.**

The wind funnel/vortex created by the spaces in the buildings will encourage invasive Flora species seeds to get a foot hold.

#### **Office of Public Works.**

Storm water drains flow from the proposed site into the Santry River and onto Dublin Bay, the Wad River is the catchment for the area; both rivers requirer on going maintenance, which is subject to planning.

Santry Demesne was flooded in 2019, the area of the flooding is 50 meters from the proposed site.

October 2008 the R132 was flooded from the proposed site to the Swiss Cottage, Northwood Ave junction Swords Road, Santry Demesne entrance and M1 under the Whitehall flyover. To date after heavy rain water prevails in the area of the proposed site.

Santry River was assigned a Q Value of 2.3 (Poor status) in the most recent EPA monitoring survey carried out in 2019.

Santry Community Resources Centre which is 50 meters from the site required storm water to be pumped out of the basement in November 2002.

Historical Flood Events, Santry October 2011, July 2009, October 2004, November 2002.

## 2.2.2 Smart Travel.

Mobility Management Plan (MMP)

3.3.9 Page 24.

*The subject site benefits from excellent public transport System-Bus.*

**This is a misleading quote.**

The Bus service that operate through Santry, commence from Rush/swords.Dublin Airport/Skerries etc; Dublin Airport at its peak had 500,000 passengers a month, most of these use the Bus service, as Dublin Airport is not served with a Rail Link, the nearest Rail station is Malahide/Ashtown, there is no Bus terminal in Santry.

The proposed Metro Link nearest station will be at Northwood Ave Ballymun. The Mobility Management Plan (MMP) is based on Swords to City route, it fails to acknowledged the volume of travellers that use the bus from Dublin Airport through Santry.

## Fire Safety & Health.

The height of the proposed buildings is a concern, due to the experience with the fire in the Metro hotel Ballymun, when it was revealed that it was luck that the fire was not on the top floor, as fire fighting equipment was sparse.

The size of the proposed apartments and the space in the corridors of the buildings are a health concern which may give rise to the spread of covid and other related viruses.

## Saint Pappins Church & Holy Well.

Saint Pappins Church & Holy Well is the only remaining Historical and Ecclesiastical site left in Santry.

Built in 1709, reputedly built on the 12 Century parish church.

The height of the proposed development buildings, will cast a shadow over Saint Pappins Church and will destroy the realm of this historical and ecclesiastical site and graveyard.

page 5.

Signed.

Patrick Fagan— Patrick Fagan —————

Case reference: TA29N.314019 - Santry Avenue Strategic Housing Development

OBSERVATIONS Patrick Cosgrave - [REDACTED]

The scale and density of this development are too large for the site, particularly in the case of the 14 storey building which is sited on the corner of the site at the Santry Ave - Swords Road junction, which seems a particularly inappropriate location - it will detrimentally affect both traffic and the overall aesthetic aspect of the area, overpowering most local premises, including Santry Demesne park. The scale of the recent developments - Santry Place, Swiss Cottage is significantly less and more in keeping with the general area.

Traffic volumes in the area have been constantly increasing in recent years and Santry Avenue in particular is inadequate for the level of traffic that will ensue and during the construction phase particularly I believe will contribute greatly to traffic congestion going back to Coolock Lane and also as far as Shantalla Road. At weekends in particular, Santry Village from Omni Park to Santry Avenue is already badly congested. The development will significantly worsen this. Shanowen Road is a rat-run for commercial vehicles and will probably worsen as a result of this.

Infrastructure is inadequate for the volume of extra people in the area - schools, medical community centres, arts/entertainment centres, Beaumont Hospital is already at near capacity - what consideration has been given to resources there? - no mention of that evident in any planning or developer documents.

Santry residents have been seeking a Local Area Plan for a decade or more - there is not even a pretence of addressing this - this is a disgraceful example of democratic deficit and appear to be as calculated insult to the citizens of Santry and North Dublin generally by a Planning Board already mired in controversy and some members or former members apparently complicit in dubious practices.

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 area without a plan and no accountability

Material contravention of a development plan

- · would be expected to be exceptional
- · in Santry it is in fact systemic
- · in reality this is An Bord Planala's plan for the

Mental Health

- Small apartments are stressful environments in which to live
- Apartments contribute to isolation through absence of shared space
- High rise apartment living contributes adversely to mental health - \*2 no supports propose

**\*2 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**

<https://dublininquirer.com/2021/08/04/dublin-fire-brigade-not-equipped-or-trained-to-deal-with-fires-in-high-rises-says-firefighter>

This development has been refused once for valid reasons, widely welcomed by Santry Residents – please continue to recognise the view of the community and maintain the refusal of this unwelcome development – particularly the 14 Storey blocks- and significantly scaled down development would be more in keeping with the area and is likely to be more acceptable to residents of Santry, who I believe recognise the need for appropriate housing , serving the needs of the community and not that of developers and property speculators.

Mob: 999 7069321 Email: [adnan@adnanpk.com](mailto:adnan@adnanpk.com)

73 Swords Road

Santry

Dublin 9

Re: SHD application No 314019 - Former Heiton Buckley Site, Santry Avenue, Dublin 9

APB Reference: TA29N.314019

Dear Sirs

I wish to make the following observation on the above planning application.

It goes without saying that housing is badly needed in Dublin at the present time and housing development on former light industrial lands in suburban areas, such as Santry, is to be welcomed.

It has been highlighted by myself and many others that this area of Santry i.e. Swords Road from the junction with Santry Avenue to Omni Park shopping centre has been the subject of several new apartment developments which have had, in my opinion, a detrimental effect on the thoroughfare itself and the surrounding housing, due to the heights permitted, with new buildings causing overshadowing of adjoining residences. This application will further add to this 'tunnel' effect on Swords Road creating an urban canyon effect along this stretch. The proposed site is opposite a block of two story buildings, site of the former Santry forge and adjoining historic St. Pappin's Church. Consequently, I believe, the proposed height of fourteen block to the front of the development will be completely out of context of this suburban junction, contravenes the City Development Plan and will destroy the appearance of what remains of Santry Village. The highest building should be situated to the rear of the site and height of other blocks stepped down accordingly with the lowest height at the corner of the site facing onto Swords Road/Santry Avenue junction. This would make for a far more pleasing streetscape when entering the area from the north. This suburban site bounded by parkland, historic buildings and two story houses (Santry Villas) overlooking the original village green, is not the place for a 'landmark' building and would destroy what remains, visually, of Santry Village.

I would question the need for four commercial spaces. Omni Centre, to the south has been designated a Key Urban Village in the upcoming development plan so surely all retail outlets in the area should be located there? There are several empty former shops, which have been vacant for some years now, directly opposite this site which proves the difficulty of trading in this area.

I also note the lack of creche provision. At our presentation today the planner stated that a creche place assessment had been submitted – we did not have sight of the results of this placement but as this development brings to over 1200 the apartments built / being built along the stretch between this site and Omni Park, I would request that this issue be given due consideration. In terms of

school places, I would also note the stated low number of primary school places available locally and the comments of the Department of Education, in respect of another nearby development, in relation to this current lack of school provision to deal with the increased demand that the recent building developments in Santry will bring.

I note the positive addition of a medical suite but suggest that if a larger area could be made available, would there be scope, in conjunction with the HSE, to provide a much needed primary care centre?

There has been previous commentary on the inadequacy of Santry Avenue as an extremely busy cross city commuter route. It suffers from extremely heavy traffic congestion, not just at peak times, and the method of entry/egress onto it and Swords Road, which is also an extremely busy main arterial route should be taken into consideration. A 'no right turn' upon exiting from the development onto Santry could be of assistance to the traffic flow. Again, we had no sight of traffic reports at the SHD presentation.

As previously stated, Santry has been subjected to quite a significant amount of new developments over the past couple of years, and as noted above, there will be around 1200 new apartments built on this stretch of road alone when this is completed and adjacent light industrial land waiting to be rezoned. Yet each planning application has been looked at separately and no mention in any of SHDs how facilities in the surrounding area are going to be upgraded/ increased to cope with the increase in population. We have made this point at every SHD presentation but it has yet to be addressed. Before this or further developments in the area are granted permission, there should be an audit of school places, and all other public services to see if the needs of the increased population can be met.

Finally, as stated at the outset, I welcome much needed development on this site, but I believe that planning should not be granted for the fourteen story block due to excessive height and destruction of the visual amenity of a suburban village area.

Patricia Roe

Councillor Whitehall – Artane

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1



10<sup>th</sup> August 2022

Dún Scéine, Lána Fhearchair  
Baile Átha Cliath 2, D02 WT20

Dun Scéine, Harcourt Lane  
Dublin 2, D02 WT20

~~tel: 076 6300~~

~~www.nationaltransport.ie~~  
www.nationaltransport.ie

**RE: Planning Application File Reference 314019 – SHD at Santry**

Dear Sir / Madam,

The National Transport Authority (the "NTA") has reviewed the above referenced planning application and, based on the Transport Strategy for the Greater Dublin Area 2016-35 (the "Transport Strategy"), which is a consideration material to the planning process in the Greater Dublin Area, make the following observations and recommendations.

#### **1. BusConnects**

The proposed development interfaces with the BusConnects Swords CBC scheme. The CBC is provided for in the Transport Strategy and planning consent will be sought for same in the coming months. The NTA notes the provision of drawing no 200060-X-90-X-DTM-DR-DBFL-CE-1401 as part of the application and is of the view that it is likely that the development can proceed in a manner which facilitates BusConnects.

The detailed design of the CBC scheme, however, has progressed since that assumed in the material submitted and it will be necessary for the applicant to demonstrate that the interface between the proposed development and the final CBC design facilitates the NTA's scheme. This includes the detail of the access arrangements from Swords Road.

#### **Recommendation**

The NTA recommends that, in the event of a grant of permission, the applicant is required to liaise with the NTA in advance of and during construction in order to ensure that the proposed development, including the access arrangements, is undertaken in a manner which facilitates the BusConnects CBC scheme.

I trust that the views of the NTA will be taken into account in the assessment of the above planning application.

Yours sincerely,

---

Michael MacAree  
Head of Strategic Planning

An Bord Pleanála  
64 Marlborough Street  
Rotunda  
Dublin 1 D01 V902

Ref. TA29N.314019

AN BORD PLEANALA	
NO-	055963-22
GP-	
08 AUG 2022	
Re: 20	Typ: PML
Date: 13.00	By: hand

We Maura and John O'Grady, 59 Magenta Hall, Santry, Dublin D09 r667, are making the following OBSERVATIONS regarding the planning application TA29N.314019

#### Public Transport

The public transport is already very poor busses are often full when they get to Santry. There is no bus service originating in Santry to provide transport for locals.

#### Water

Water pressure is already bad since the development at Swiss Cottage and Santry Place.

#### Drainage

The drainage in the area cannot cope with what is all ready there. Swords road from Santry Avenue to Magenta is often flooded in wet weather. Given the development at Swiss Cottage and Santry Place to add this massive amount of High Rise would impact hugely to the water collection in this area.

#### Infrastructure

There is no overall plan for the area  
I.E No Library, no medical centre, G.Ps at capacity no provision for schools

#### Traffic

Traffic is already bumper to bumper at rush on the Swords Road, it can take 20 minutes to get out of Lorcan road or into the Omni shopping Centre. Traffic extends from Beaumont Shantalla to Santry Avenue and Santry Avenue traffic extends to Coolock lane another 200+ cars will create total chaos at these junctions and on the Swords Road and adjoining roads.

#### Environmental Impact

Air quality is not monitored in the area. High rise development contributes to stagnant air. Proximity to the M50 and Port tunnel exit exacerbates this risk.

1000 extra cannot people be catered for in Santry as the area is already overcrowded.



Louise Lowry, 65 Magenta Hall, Santry, Dublin 9

Observation APB 308093-20

Case Reference TA29N.310910

The area for this planning application (ABP 308093-20) was zoned as Z3 neighbour centre which allows for some housing. Planning permission is being sought for over 90%+ of the area for housing.

Following on from this the type of housing been proposed is not blending with the infrastructure in the Santry area (mainly 3 bed semi- detached houses).

Santry as an area is now becoming inundated with high rise, high density occupancy in a small area of the Swords Road. Omni Living has already been approved for 12-5 storeys (324 apartments) & a hotel. Beside that is Santry Place (which has been turned down for phase two of their development) and then next to that we will have the Dwyer Nolan Development.

There is no consideration in the plan for building any schools, medical facilities, creches & community facilities (swimming pool, sports facilities etc..) At present there is no schools in Santry and school age children have to travel to school which puts more demand on the public transport which mainly originates in Swords/Balbriggan/Skerries and full before it comes to Santry. This then leads to more cars been used and this adding to the already congested Swords Road/Santry Ave in Santry. Also the cars using Lorcan Drive/Road/Magenta Hall as a rat run will increase.

The majority of the apartments purposed for the development will be mainly one & two bed apartments which does not facilitate families and will bring in a transient population to the area. Also it can lead to excess people staying in an apartment (3/4 people in a one bed apartment) due to the high rents. In my employment I have seen this happening and have had to deal with this problem on an ongoing basis.

Apartment living can work if they are lower in size (3/4 storey's) have sufficient green area for the residents to relax in and a play area for children. Some complexes are building gyms and cinema rooms in the complexes which is a start and a very good idea but this is not the case with Dwyer Nolan.

Another concern I have for high density, high rise complexes is that rents are rising faster than incomes and as all of these apartment are built to rent that is very concerning on how people are going to afford these apartments on an on going basis and in the future will this turn the area into an unsafe area & then in the future the apartments have to be demolished and proper houses built (Have we learnt nothing from Ballymun which is only 1km from this proposed development) Will the apartment complex have a lot of vacant apartments as the younger generation/families cannot not afford to move in and are staying longer with parents.

It would be nice to see a development interact with the local community and all design a plan together for suitable housing in the area. I know this is probably a very nieve statement to make but residents of Santry are not opposed to new housing in the area but having one stretch of the Swords Road(less the .5km) totally destroyed with high rise apartments just beggars believe.

**Case Reference Number:** TA29N.314019

I wish to make an objection about the planned development at the Chadwicks/Buckley's site on Santry Avenue, case reference number above.

I live in Santry and have been dismayed to see the imbalance between new housing developments and new amenities. In the last number of years, there have been a very large number of new apartments built in Santry Village, for example Santry Place and the apartments built on the Swiss Cottage site. However, there has been no corresponding increase in local amenities and facilities, such as schools, doctors and so on. In addition, there has been a noticeable increase in traffic jams and tailbacks coming up the Swords Road towards Santry Village. The increased number of cars in the Village has a knock-on effect on traffic coming from Coolock Lane, leading to tailbacks and slow-moving traffic when trying to approach Santry Village from the North. The 231 new car parking spaces included in this proposed development will further exacerbate this problem. The increased number of commuters will also put pressure on an already busy bus system. A clear plan on how these issues will be addressed is required before proceeding with further housing developments in the area.

The proposed height of the building is a further cause for concern. Current proposals are for a 14 storey building. This is unreasonably high in a small residential village. Some of the recent developments have already dwarfed the existing buildings in Santry Village, and they are far below 14 storeys in height. This proposed apartment structure is almost as high as Liberty Hall – once the tallest building in Dublin – and would dramatically change the topography of the area, overshadowing the Village. In addition, Santry is very close to Dublin Airport, so there are undoubtedly risks to having such a high building in such proximity to the airport, in terms of aircraft flight paths.

In summary, my grounds for objection are that there has already been a large increase in the local population with no corresponding enhancement of available infrastructure, facilities, amenities and services, and a local community plan is required before any further approvals are given. In addition, the proposed height of this development is unfeasible for any small residential village, particularly one so close to Dublin Airport.

Louise Doyle

141 Parklands, Northwood, Santry, Dublin 9.

An Bórd Pleanála,  
64 Marlborough Street,  
Dublin 1

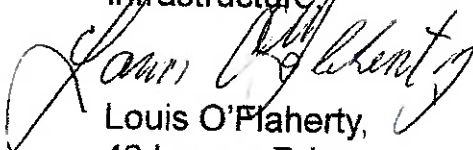
AN BORD PLEANÁLA	
LDG-	055922-22
ABP-	
05 AUG 2022	
Fee: €	50
Time:	3:43
By:	Land

Re Santry Avenue SHD Development

Case Reference TA29N.314019

As a long time resident of Santry I wish to object to the proposed development by Dwyer Nolan at the junction of Swords Road and Santry Avenue for the following reasons,

1. Over-Building: The scale and size of the proposed buildings are indicative of over-building when considered in any assessment of plot to site ratios as recognised by Dublin City Council. This is manifestly true when considered with the already completed Santry Place and Swiss Cottage developments and the proposed development at Omni Park.
2. Mass of Proposed Tower Block: I contend that a 14 storey tower block at this location will be particularly intrusive and it is my opinion that the computer generated images give a false impression of the size of the completed development.
3. In recent years Dublin City Council demolished seven twelve storey apartments in Ballymun. It now appears that that there is an intention to encourage high rise development in nearby Santry without any extra infrastructure



Louis O'Flaherty,  
43 Lorcan Drive,  
Santry,  
Dublin DO 9 WN 36

5th. August 2022

Encl. Cheque €20



Liam, Geraldine, Emma Mc Mullan  
87 Lorcan Drive  
Santry  
Dublin 9  
D09 A2A4

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

2 August 2022

**RE: Case reference number TA29N.314019 (Santry Avenue application – Dwyer Nolan Developments Ltd)**

Dear Sir/Madam,

I refer to the case number above and wish to express my objection to this development.

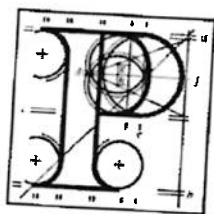
The proposal provides for 350 apartments in a 14 storey building and the Social and Community Infrastructure Assessment indicates that this development “caters for an appropriate range and variety of social & community infrastructure”. However, this has not been demonstrated within the report. The proposed facilities that are set out in section 8.0 are not exhaustive and do not appear sufficient to serve the needs of the residents of the development, nor the existing community within Santry. The facilities set out do not provide for childcare, extended medical care (e.g. mental health, physio, family planning), education, supports for an ageing community – these, amongst others are everyday facilities that are required within a community. Given that this development proposes to host a significant number of residents, all facilities that may be required within a community must be in place before development. It is not sufficient to rely on the existing facilities that are set out in section 7.0 of the report. These services are currently in use by existing residents with many on waiting lists and currently unable to avail of such services. I believe a statement within the Social and Community Infrastructure Assessment misrepresents the existing facilities and further supports my statement above that the existing facilities are not robust enough to support the proposed development. The report highlights that six of the 14 childcare facilities identified in the study area did not respond to queries regarding availability for their services. The report suggests that these facilities do have availability, however, given no response was received, it is inaccurate to indicate that these services are available. The inclusion of such inferences in this report raises questions in other areas of the assessment and ultimately undermines the accuracy of the details of the report given the demonstrated biases that are portrayed by the authors. As such, I believe that no positive decisions in respect of the development should be made on the basis of the report unless or until an audit of its contents is conducted and/or a social and community infrastructure assessment is undertaken by an independent party. It is imperative that non-residential developments are in place and operational before any further residential developments are approved in Santry.

As mentioned above, the proposal is for a 14 storey block of buildings. This is unprecedented in the area and surrounding areas and the proposal is not justified in why developments of such height is required. It is worth noting that only a couple of hundred meters away in Ballymun, buildings of 15 storeys were demolished over a number of years until 2015. The Ballymun flats were erected quickly without sufficient community supports being put in place. This created a number of social problems in the area and dealing with these issues came at the cost of the tax payer. This is the recent history of the surrounding area and residents do not wish for history to repeat itself. It should therefore be the responsibility of the developer of any residential area to ensure that appropriate facilities and supports are in place for future residents of the development. This is not the case in respect of the Santry Avenue SHD application. No new schools, hospitals, community areas (e.g. sports grounds, community centres etc) have been established to support an influx of residents to the area. Therefore, questions must be raised as to how this development will positively contribute to the existing community in Santry. New residential developments should not negatively impact the existing residents of Santry – it is a basic human need to feel safe in your community and this right should not be tampered with by developers.

In addition to developing appropriate facilities in the Santry area, further consideration is needed on the traffic and transport infrastructure currently in place and proposed in the future. At present, there are significant delays travelling through Santry which can largely be attributed to the recently developed Santry Place and Swiss Cottage Apartments. It is evident that no consideration of the impact of these residential developments on Santry Village was undertaken and that no measures were taken to address this problem. It is therefore highly inappropriate and morally irresponsible to approve a larger development beside Santry Place. This is not only a matter of traffic management but is also a health and safety matter as current traffic practices which include illegal turns and moves through lanes carry an increased risk to pedestrians and cyclists in particular. Another traffic related matter is parking. The proposal includes only 209 parking spaces for 350 apartments and retail units. While I understand not every apartment will have a car, some apartments will have more than one car. This raises questions as to where the additional cars will be parked. This will likely result in residents parking cars illegally or parking outside the homes of existing residents in Santry. Neither of these situations is appropriate and must be rectified by developers in advance of any residential and/or commercial units being considered for the area.

In light of the above, I sincerely hope that further consideration and questions will be raised in respect of the appropriateness of the Santry Avenue SHD application on both existing and future residents of Santry. The current proposal shows no signs of enhancing the community as everyday facilities as mentioned above that will be needed by any new community to the area have not been put in place. Until such time as appropriate healthcare, education and wellbeing facilities are established in Santry, new residential developments should not be approved. This is in the best interests of the existing community of Santry.

Yours sincerely,  
Liam, Geraldine, Emma Mc Mullan



An  
Bord  
Pleanála

## Observation on a Planning Appeal: Form.

### Your details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Kenneth Gavin Click or tap here to enter text.

(b) Address

267 Swords Road, Santry, Dublin 9. Eircode  
D09TD74

### Agent's details

#### 2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please also write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's address

Click or tap here to enter text.

## Postal address for letters

3. During the appeal process we will post information and items to you or to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the  
address in Part 1

☒

The agent at the address  
in Part 2

☐

## Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

(a) **Planning authority**

(for example: Ballytown City Council)

Dublin City Council

(b) **An Bord Pleanála appeal case number (if available)**

(for example: ABP-300000-19)

TA29N.314019

(c) **Planning authority register reference number**

(for example: 18/0123)

2713/17 & 2737/19

(d) **Location of proposed development**

Junction of Swords Road and Santry Avenue Dublin 9

I am a resident of Santry since November 1989



## Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

Regarding Case Reference TA29N.314019 (Santry Avenue SHD application-Dwyer Nolan Developments Ltd.) I wish to make the following observations

- 1) I object to the proposed density of the site with 350 apartments on 1.5Ha.
- 2) A 14 storey building on the site will cause additional hazards regarding fire safety as Dublin Fire Brigade are not sufficiently equipped to deal with fire above 8 stories high. As evidenced in the Metro Hotel Fire in March 2018 which took sixty firefighters, eight fire engines and two aerial appliance plus a supporting fire engine from Dublin Airport to bring the fire under control
- 3) The additional traffic with the provision of 231 car spaces will increase the traffic problems and pollution in the Santry Area. The Swords road from Northwood to the M1 Flyover has serious traffic issues and the resultant air pollution from stalling vehicles has now reached critical levels that it now is causing serious health issues to residents on the Swords Road.
- 4) The infrastructure in Santry has not developed with the additional apartments that have been built in Santry over the last 15 years. No additional schools have been added to the area. Our doctor surgeries are not able to cope with the additional population and doctors have not stopped accepting new patients.

Regards,

Kenneth Gavin

267 Swords Road, Santry, Dublin 9.

## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

## Fee

7. You **must** make sure that the correct **fee** is included with your observation. You can find out the correct fee to include in our **Fees and Charges Guide** on our website.

This document has been awarded a Plain English mark by NALA.  
Last updated: April 2019.

Observation on a Planning Appeal:  
Form - April 2019



## Observation Document

Ken Lyons  
38 Lorcan Road  
Santry  
Dublin 9  
D09TW32

Case #: 314019

Case Reference; TA29N.314019

The Santry area is in need of a well-considered, long-term development plan that supports the development of residential units that is in keeping with the existing character of this long-established area. In the absence of such a plan, we will continue to see applications, like this one, which do not support the goals of sustainable community development, availability of appropriate housing, availability of essential services, and availability of appropriate infrastructure.

In essence, Santry is not a suitable location for high rise living particularly when the application in question includes heights of up to 14 storeys. A simple observation of existing developments in the area, which unfortunately received approval (Santry Place, The Swiss Cottage) show how such developments are out of sync with the area and completely change, negatively, the character and aesthetic of a long-established residential area like Santry. The site in question would be suitable for the development of a residential area comprising of houses and not high rise apartments.


From a mobility perspective, the proposed number of car parking spaces signals that the already compromised infrastructure will be further compromised and lead to increased traffic congestion. A simple observation of traffic patterns along the Swords Road shows that the existing infrastructure is under immense pressure, which has led to Lorcan Road being used as a rat run, posing a danger to young and old residents and compromising the quality of life of residents in this area.

I implore you to realise the negative consequences of such a development and refuse planning permission.

Regards,

Ken Lyons

Kate Carroll  
9, Oakpark Avenue,  
Santry,  
Dublin 9  
D09TY79



7<sup>th</sup> August 2022

To whom it may concern,

***REF: CASE 314019 – CHADWICKS SITE – SANTRY AVENUE AND SWORDS ROAD***

I wish to lodge my objection to the above case. This case was rejected in November 2021. In my opinion there has been no change to the application and therefore should be rejected on the same observations which I lodged last year.

- To many apartments being built in the area which are not suitable for long term family living.
- Not enough schools being provided for.
- Public transport needs to be invested in first.
- There is a bat colony in the area.
- More doctors/dentists are required
- More amenities for the children of the area are required – Library, social club, safe play area etc.

Yours sincerely

Kate Carroll

Cllr John Lyons

Richard O'Carroll Room

City Hall

Cork Hill

Dublin 2

08/08/2020

I am making an observation on the SHD planning application TA29N.314019

At the junction of Santry Avenue and Swords Road, Santry Dublin 9 – occupying the site of the existing Chadwhick Builders Merchants.

I am requesting that this planning application is refused.

Santry is urgently in need of an overarching plan that can sensibly plan the future development of the area; sadly, in the absence of such a planning document that could guide all planning applications, the area is suffering from a number of separate planning applications, each of which has little regard to the needs of the existing and future communities and the wider area. The result to date is disjointed development, devoid of any community-building commitment. This planning application is, unfortunately, the latest one to feed into this very unsatisfactory process.

The heights of the apartment blocks, ranging from seven to ten to fourteen storeys high, not only materially contravene the current Dublin City Development Plan guidelines on heights but signify an absolute disregard on the part of the applicant for the area: such heights cannot be permitted if sensible planning is to prevail as they will add not enhance the area architecturally or aesthetically but rather symbolise the greed of the applicant to squeeze in as many profit-making apartments as possible and will do irreparable damage to the Santry is constructed.

The permeability of the development is dubious, and the open space provided for insufficient.

The Social and Community Infrastructure Assessment (SCIA) needs to be examined as the reasons for not including childcare facilities as part of the proposed development smack of penny-pinching. Indeed, the entire SCIA reads like one long excuse for not adding anything new to the social and community infrastructure of the area bar a small space for a GP practice and a community hub. Both of the latter would need to be significantly enlarged to have any meaningful and positive impact.

As a serving public representative for the area I am acutely aware of the urgent and dire need for affordable, high quality housing in Dublin: for far too long thousands of individuals, couples and families have been forced to struggle to secure homes for themselves and their families so any proposed residential development for the area must in the first instance be welcomed but then it must be critically assessed to ensure that the future residents of the development will have somewhere suitable, enjoyable and affordable to live, that the proposed development integrates well into existing community and indeed plays its part in the sustainable and sensible development of

the Santry area. Unfortunately, this current application fails on every point and therefore must be refused.



To: An Bord Pleanála  
64 Marlborough Street,  
Dublin 1.

BB/COC

27<sup>th</sup> July 2022

**Our Clients:** John Conway of 91 St. Nicholas Avenue, Dundalk, Co. Louth; and the Louth Environmental Group of 91 St. Nicholas Avenue, Dundalk, Co. Louth.

**Re:** Proposed Strategic Housing Development (Case No. 314019) Demolition of the existing building on site and construction of At the junction of Santry Avenue & Swords Road, Santry, Dublin 9 – occupying the site of the existing Chadwick Builders Merchants. The site is bounded to the north by Santry Avenue, to the east by Swords Road, Santry, Dublin 9. Demolition of the existing building on site i.e. the existing Chadwicks Builder Merchants, construction of 350 no. apartments and associated site works.

Dear Sirs,

On behalf of the above-named Clients, we wish to lodge the within written submissions/observations on the proposed Strategic Housing Development comprising the demolition of the existing building on site and construction of 350 no. apartments and associated site works at the junction of Santy Avenue and Swords Road, Santry, Dublin 9., pursuant to s.8 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The grounds and reasons for our submission/observations are detailed hereinafter.

**Planning and Development Act 2000, Section 28 of the Planning and Development Act 2000 (as amended) & Guidelines**

- (i) The Board should refuse to consider and cannot grant permission for the proposed development in circumstances where such grant would have to be justified by reference to the Guidelines for Planning Authorities on Urban Development and Building Height 2018 and the Apartment Guidelines,

252 Harold's Cross Road, Harold's Cross, Dublin 6W, Ireland, D6W T384  
t. +353 1 497 6877 | +353 1 497 6866 | +353 1 412 5989 f. +353 1 497 6865

www.bkcsolicitors.com  
info@bkcsolicitors.com

Principal - Brian Burns, Solicitor - Gwen McCool, Office Manager - Christine O'Connor

DX 222 004

dated December 2020. These Guidelines and the specific planning policy requirements contained therein are *ultra vires* and not authorised by section 28(1C) of Planning and Development Act 2000 (as amended). In the alternative, insofar as section 28(1C)) purports to authorise these Guidelines, including the specific planning policy requirements, such provision is unconstitutional/repugnant to the Constitution. The said Guidelines are also contrary to the SEA Directive, insofar as they purport to authorise contraventions of the development plan/local area plan, without an SEA being conducted, or a screening for SEA being conducted, on the variations being brought about to the development plan/local area plan as a result of same.

- (ii) The Developer has sought to rely on out of date Apartment Guidelines, 2018, as opposed to 2020 (see Material Contravention Statement conclusions) – as such any purported reliance on the Apartment Guidelines in the Material Contravention Statement and planning documentation is incorrect and not carried out in compliance with the requirements of the planning acts.
- (iii) The proposed development materially contravenes the requirements of the Development Plan in relation to unit mix and floor areas, which cannot be justified by reference to the Apartment Guidelines, SPPR 1 and SPPR 8 set out therein.
- (iv) The proposed development materially contravenes the requirements of the Development Plan in relation to building height. The proposed development includes for 4 no. buildings, sub-divided into 7 no. blocks (Blocks A-G), that range from c. 22.9m (7 storeys - Blocks B & G) to c. 48.3 meters (14 storeys - Block A). The proposed building heights are above the stated 16 metre height for the subject site's location, as stated in the CDP, and therefore, the exceedance of the proposed building heights in relation to the CDP height parameters may be deemed by the Board to constitute a material contravention of the CDP. The proposed development and documentation presented does not comply with the requirements of the Guidelines for Planning Authorities on Urban Development and Building Height 2018 ('the Height Guidelines'), including the SPPR's set out therein and the Criteria and Specific Assessments identified therein. The Board cannot grant permission for the proposed development in circumstances where the



relevant criterion under the Height Guidelines, which are mandatory in nature, cannot be satisfied. In this regard, reliance on SPPR1 of the Height Guidelines is misplaced (pg.13 of the Developer's Material Contravention Statement). The Developer's purported implementation of SPPR3 and the Specific Assessments detailed therein is flawed – in this regard it is noted that no assessment of bird impacts has been assessed.

- (v) The Board cannot grant planning permission for this development under Section 37(2)(b) of the Planning and Development Act 2000. The proposed development is not of strategic or national importance – the Developer has not adduced any objective basis for asserting that the proposed development is of strategic or national importance. Purported reliance in the definition of “*strategic housing development*” under the 2016 Act as a basis for asserting that the proposed development is of strategic or national is erroneous.
- (vi) Inadequate communal open space is provided having regard to the requirements of the Development Plan. The results of the Shadow/Sunlight Amenity submitted indicate that a significant portion of those areas of genuine communal open space are below the 2-hour requirement (2 hours of sunlight on the 21st March) in accordance with BRE Guidelines. The proposal is not in compliance with the said Guidelines.
- (vii) Inadequate consideration has been given to infrastructure to support the development, including rail services and schools.

#### **Environmental Impact Assessment Report (EIAR)**

Article 2(1) of Directive 2011/92 (as amended by Directive 2014/52/EU) governs the relationship between giving consent and the assessment of the environmental effects:

“Member States shall adopt all measures necessary to ensure that, before development consent is given, projects likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects on the environment...”

The EIAR, is inadequate and deficient and does not permit an assessment of the potential environmental impacts of the proposed development.

- (i) The process provided for under the 2016 Act contravenes the requirements of the EIA Directive and the public participation requirements set out at Art.6 in circumstances where the public concerned are deprived of the opportunity to view and consider relevant statutory reports and advices obtained by the Board, such as the report from the Planning Authority/Chief Executive (a statutory consultee under the 2016 Act), prior to the making of observations/submissions on the proposed development – which such reports contain relevant information in relation to EIAR.
- (ii) The Board lacks ecological and scientific expertise and/or does not appear (in light of the information available on the Board's website) to have access to such ecological/scientific expertise in order to examine the EIA Screening Report as required under Article 5(3)(b) of the EIA Directive, which states that in order to ensure the completeness and quality of the environmental impact assessment report, *inter alia*, "the competent authority shall ensure that it has, or has access as necessary to, sufficient expertise to examine the environmental impact assessment report."
- (iii) The Proposed Development, and documentation submitted, including the Planning Report, does not comply with the requirements of the Planning and Development Act 2000, the Planning and Development Regulations 2001, or the EIA Directive. The information submitted by the developer is insufficient and contrary to the requirements of the EIA Directive (Directive 2011/92/EU as amended by Directive 2014/52/EU) and the provisions of national law, including the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).
- (iv) The Population and Human Health chapter of the EIAR is inadequate in that it fails to assess the impact of an increased population in the area on services including schools, childcare and medical care.
- (v) The impact on biodiversity and human health arising from the proposed development, during both the construction and operational phases, is

inadequate and lacking in terms of detail – the EIAR is deficient in this regard.

- (vi) The EIAR does not consider the potential impact of the height of the proposed development on bird flight lines/paths and collision risks.
- (vii) Inadequate assessment has been carried out in relation to the potential hydrological connection between Santry Demesne pNHA, North Dublin Bay pNHA and the site via the Santry River.

#### **Screening for and/or Appropriate Assessment**

By way of general summary, the information presented by the Developer is insufficient, contains lacunae and is not based on appropriate scientific expertise – as such the Board cannot comply with the requirements of the Habitats Directive and relevant provisions of national law under the Planning and Development Act 2000. Under Article 6(3) of the Habitats Directive, an Appropriate Assessment of the implications of a plan or project for the site concerned implies that, before the plan or project is approved, all the aspects of the plan or project which can, either individually or in combination with other plans or projects, affect the conservation objectives of that site must be identified, in the light of the best scientific knowledge in the field. The competent national authorities are to authorise an activity on the protected site only if they have made certain that it will not adversely affect the integrity of that site. That is so when there is no reasonable scientific doubt as to the absence of such effects (see Case C-461/17, *Holohan & Ors v. An Bord Pleanála, Preliminary Reference*, 7 November 2018, para.33; see also Case C-243/15, *Lesoochránárske zoskupenie VLK*, 8 November 2016, para.42; *Commission v. Spain*, Case C-404/09, 24 November 2011, para. 99; and *Grüne Liga Sachsen and Others*, Case C-399/14, 14 January 2016, paras. 49 and 50). An Appropriate Assessment carried out under Article 6(3) may not have lacunae and must contain complete, precise and definitive findings and conclusions capable of dispelling all reasonable scientific doubt as to the effects of the proposed works on the protected area concerned.

- (i) The Proposed Development does not comply with the requirements of the Planning and Development Act 2000 (as amended) (*under Part XAB of the 2000 Act (ss.177R-177AE)*) and the Habitats Directive. Due to inadequacies and lacunae in the AA Screening Report and NIS prepared by the Developer

the Board does not have sufficient and/or adequate information before it to carry out a complete AA Screening and AA in relation to the proposed development.

- (ii) Inadequate information has been provided in the NIS to screen out the potential impact of the proposed development on birds – reference to generic statements is not a substitute for expert scientific opinion as to the potential impact of the proposed development, during both construction and operational phases on birds, including bird flight lines and collision risks.
- (iii) The AA Screening assessment, included in the NIS, does not provide sufficient reasons or findings, as required under Art.6(3) of the Habitats Directive and national law, to the requisite standard – the conclusions/statements made therein do not identify any clear methodology and no analysis is offered in respect of the AA Screening conclusions in respect of the protected sites “screened out” at the said AA Screening stage.
- (iv) The “Zone-of-Influence” referred to in the NIS is not reasoned or explained – it is unclear how such a zone was so determined – the criteria for determining a “zone-of-influence” has no basis in law. Furthermore, the limitation of the consideration of protected sites to a 15km radius is not explained and it is unclear how such a limitation was determined.
- (v) No regard and/or inadequate regard has been given to the cumulative effects of the proposed development, in combination with other development in the vicinity, on the protected sites.
- (vi) The Santry River is approximately 675m to the north of the Site and flows in a south-east direction into North Dublin Bay. The Santry River was assigned a Q-value of 2-3 (Poor Status) in the most recent EPA monitoring survey carried out (2019, station code: RS09S010300). This river is At Risk of not meeting its Water Framework Directive (WFD) status objectives
- (vii) Reliance on the Ringsend WWTP is flawed given the precarious status of same.
- (viii) It is impermissible to rely on mitigation measures/measures designed to negate the impact of a proposed development on the conservation status of



a protected site – see AA Screening Report consideration of the is a potential hydrological connection between the Site of the Proposed Development and North Dublin Bay SAC and North Bull Island SPA.

We also enclose herewith fee in the sum of €20.00.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Christine O'Connor', written over a horizontal dashed line.

Christine O' Connor  
BKC Solicitors

8<sup>th</sup> August 2022

Jimmy Scurry  
29 Oak Rise  
Royal Oak  
Santry  
D09 XP96

**Re: Case reference: TA29N.314019**

**To whom it may concern,**

I wish to make the following objection against planning permission for the Santry Avenue SHD application from Dwyer Nolan Developments


I feel our community is under constant threat from developers in their efforts to continue requesting planning permission for residential apartment developments in the Santry area. We, the residents, have to be extra vigilant to these applications. It is taking a huge amount of our time and finances, lodging objections, holding meetings, organising protests, to stave off these developers and yet here we are again with another planning request for a new development

We have already seen a number of developments built over the last 24 months. These have caused, and will continue to cause, numerous difficulties for the local residents and community. They will have a serious impact on our health and mental wellbeing, our safety, and that of our children and elders, our environment, our traffic management, our services, school admissions, health clinics etc etc etc. and now we have another request for residential development to add more pressures to an already overloaded area and community...

I am very much in favour of local development once it's done in consideration and collaboration with all stakeholders. We need to develop a local area plan together with full public consultation and local partnership. Local authority, local business and the local community representatives. So that together we can build a people friendly and sustainable model that we can all be proud of.

Therefore, I request that you please reject this planning application from Dwyer Nolan Developments

Yours in good faith

  
Jimmy Scurry  
Local resident

8th August 2022

Case Ref. No: TA29N.314019 Jean Brophy

Observations Re: Planning Application

Case Ref. No: TA29N.314019

- There is a lack of an overall strategic local area plan for housing, infrastructure and amenities development in the Santry area. This is a big oversight if the desire is to build a sustainable and cooperative community that is for the common good.
- The present transport service to the Santry area is inadequate for existing needs of people living in the area, in particular, at peak times when people are going to and coming from work and school to mention but two reasons for travel. Past promises of enhanced transport services have never been brought to fruition. Traffic gridlock is already a part of everyday life for many of us living in the area. This will only increase with this further development which will raise the population with added needs of transport. Because of the gridlock the Greenfield housing estate is presently used as a "rat run" from Santry Avenue to Collins Avenue and Ballymun Road to Swords Road by drivers trying to get to their destinations on time. This causes huge difficulties for residents in the estate to get to/from their work and getting children to/from school etc. It adds to danger on our estate roads with some cars speeding through the estate to make up time already lost at the various junctions. Further endangerment to residents comes in the guise of increased degradation of the air quality by car emissions pollution.
- The long promised Metro North which was to be in place or to have at least a nearer completion date was part of the conditions logic for planning permission for this site, will now, we are told, not be delivered until 2034 and going on past promises we, in this area have little faith in what we are told is planned and indeed if completed I believe will have little positive effect for those living in the Santry area due to its routed distance from the Santry Village area.
- The present provision of school places serving the area are outside Santry with no primary or secondary school sited actually in Santry which necessitates parents having to use public transport or cars to take children to and from schools, leading and adding to gridlock problems outlined above. This development will put further pressure on the schools in nearby areas with the resulting rise in class numbers that will impact on the quality of teaching and learning for our children. Planned extra school places in the Drumcondra/Whitehall area will not solve the problem for Santry families as they will still need to use either cars or public transport with the same gridlock problems.
- With the ongoing increase of population in the Santry area it can be assumed that there will be more who will choose cycling as a mode of transport. There is no provision of safe cordoned off cycle lanes in the area as have been installed in other areas of the city and indeed the lack of policing of those that do exist to keep them free for safe cycling use, shows a possible already inadequate policing resource in existence in the area. Without the development of a safe cycling infrastructure the present and future residents are not being provided with an important alternative safe and healthy travel choice. With cyclists, including those using motorised bicycles and motorised scooters, now preferring to use the

pavements where cycle lanes are inadequate walking has become increasingly hazardous for pedestrians, in particular, the elderly and children. I personally have had some very near misses and imagine it will not be if I get knocked down in one of these incidents but rather when it will happen. As an elderly person who likes to walk, [REDACTED] when walking in the Santry area. This is due to inadequate infrastructure and lack of policing of safe behaviour on pavements.

- It is quite obvious that existing cleaning and pavement maintenance services are already inadequate in the area, particularly in Greenfield Estate, presumably because those that exist are over stretched and are unable to provide the services needed to maintain the streets in a clean and safe way. This development will only lead to further call on and dilution of these services.
- As it stands there are not enough GP practices in Santry to cater for present residents with many having already to travel outside the area to access a GP. This puts a huge strain on our elderly population who rather than being able to go independently to their local GP now very often have to call on already busy family members to take them or take the gridlocked public transport. The quality of life for our older residents needs to be considered. This will only become a more acute problem with an increase in population brought as a result of these developments.
- The aggregate effect of this development along with other recently completed developments will have a negative effect on the quality of life for existing residents and new residents alike. Until there has been a negotiated local, life enhancing overall development plan put in place for Santry no further housing development should be undertaken.

Therefore taking my observations as outlined above into consideration, I would not like to have this to this new development as per case no. above go ahead.

Jean Brophy  
12 Oldtown Park  
Santry  
Dublin 9





Your Ref: ABP-314019-22  
Our Ref: CDS20003546

An Bord Pleanála,  
64 Marlborough Street,  
Dublin.

**Uisce Éireann**  
Bosca OP 6000  
Baile Átha Cliath 1  
Éire

**Irish Water**  
PO Box 6000  
Dublin 1  
Ireland

T: +353 1 89 25000  
F: +353 1 89 25001  
[www.water.ie](http://www.water.ie)

8<sup>th</sup> August 2022

Dear Sir/ Madam,

**Re:** Strategic Housing Development – Regarding the construction of 350 no. apartments and associated site works at the junction of Santry Avenue & Swords Road, Santry, Dublin 9

Irish Water has reviewed the plans and particulars submitted for this Strategic Housing Development Application and based on the details provided by the applicant to Irish Water as part of their Pre-Connection Enquiry, and on the capacity available in the local networks, Irish Water has the following observations:

**In respect of Water:**

A connection is feasible subject to infrastructure upgrade by Irish Water.

In order to accommodate the proposed connection to Irish Water water's network at the Premises the following works are required:

- Connection main – Approx. 20m of new 200mm ID pipe main has to be laid to connect to the stie development to the existing 12" CI Main.
- On site storage for the average day peak week demand rate of the commercial section for 24 hour period. This separate storage is required to supply this demand and will have a re-fill time of 12 hours.
- Irish Water currently does not have any plans to extend its network in this area. Should you wish to progress with the connection you will be required to fund this upgrades.

**In respect of Wastewater:**

A connection is feasible subject to infrastructure upgrade by Irish Water.

There are capacity constraints in the downstream network. In order to provide capacity for the development the Santry Pumping Station will need to be redirected to the North Fringe Sewer catchment via an already laid rising main on Northwood Ave.

This works are not on the Capital Investment Program and would need to be funded by the developer. If you wish to proceed please contact Irish Water to provide you a scope of the required works.

**Design Acceptance:**

The applicant (including any designers/contractors or other related parties appointed by the applicant) is entirely responsible for the design and construction of all water and/or wastewater infrastructure within the Development redline boundary which is necessary to facilitate connection(s) from the boundary of the Development to Irish Water's network(s) (the "Self-Lay Works"), as reflected in the applicants Design Submission. A Statement of Design Acceptance was issued by Irish Water on 26<sup>th</sup> May 2021.

**Planning Recommendation:**

Irish Water respectfully requests the board condition(s) any grant as follows:

1. The applicant shall sign a connection agreement with Irish Water prior to any works commencing and connecting to the Irish Water network.
2. Irish Water does not permit any build over of its assets and separation distances as per Irish Waters Standards Codes and Practices shall be achieved.
  - (a) Any proposals by the applicant to build over/near or divert existing water or wastewater services subsequently occurs, the applicant shall submit details to Irish Water for assessment of feasibility and have written confirmation of feasibility of diversion(s) from Irish Water prior to connection agreement.

3. The applicant must identify and procure transfer to Irish Water of the arterial water and wastewater Infrastructure within the Third-Party Infrastructure.
4. The applicant must demonstrate that the arterial infrastructure is in compliance with requirements of Irish Water Code of Practice and Standard Details and in adequate condition and capacity to cater for additional load from the Development
5. All development shall be carried out in compliance with Irish Water Standards codes and practices.

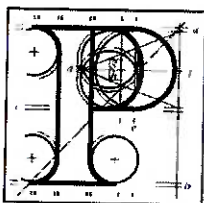
Queries relating to the observations above should be sent to [planning@water.ie](mailto:planning@water.ie)

PP. Ali Robinson

---

**Yvonne Harris**

Connections and Developer Services



## Observation on a Strategic Housing Development application

### Observer's details

#### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's  
name

Ian Croft

(b) Observer's  
postal address

2 Santry Close, Santry, Dublin 9

### Agent's details

#### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal  
address

Click or tap here to enter text.

## Postal address for letters

3. During the process to decide the application, we will post information and items to you **or** to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

☒

The agent at the postal address in Part 2

☐

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.
- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

SHD0014/22

- (b) **Name or description of proposed development**

Demolition of existing bldg. and construction of 350 apts, retail and comm.

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Junction of Santry Ave, Sword's Road

## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write. You can also insert photographs or images in this box.

(See part 6 – Supporting materials for more information.)

I wish to make an objection to the above planning application, for which the prescribed fee of €20 (Twenty Euro) has been paid.

This development as proposed is not in fitting with the current standard of design in the area. The appearance of this building is unsympathetic to the existing streetscape.

The adjacent Sword's Road which this site relies on for vehicular access and egress, is already at capacity during peak traffic times and the area cannot cope with increased traffic which could be expected should the applicant be granted permission. The existing design of the Santry Avenue / Sword's Road junction is extremely poor, and no efforts have been made to include any improvements in the new design proposed by Bus Connects. Additional filter lane to turn left from the Sword's Road is needed and a widening of the adjacent part of Santry Avenue (part adjacent to proposed development) is required, which is not included under existing Bus Connects proposal although I have made a recommendation to this extent during the Bus Connects public consultation period.

The number of parking spaces proposed in the application are completely inadequate and will underserve the site should the application get permission. The resulting overspill of cars into the community will increase the amount of haphazard parking in neighbouring estates which has already been taking place as the occupancy has increased in the other recently constructed adjacent high-density developments.

The adjacent road is a key piece of infrastructure and granting permission to the applicant for a development which is to be constructed tight to the boundary will hinder the possibility of enhancing this road or modifying the road layout to improve the junction and ease congestion in the future.

## 5. Grounds

The drainage in the area already under severe pressure and as a result there is a tendency to flood in the general area during times of heavy rain. Furthermore, there is substantial amounts surface water during heavy rain and in the event and the applicant is granted permission for high density unit is granted permission here, the drainage in the area will be under additional severe pressure which it will be unable to cope with. DCC are not servicing gullies in the area (contrary to their reports) and during rainfall the roads are constantly flooding. It is evident from Google Street view imagery that gullies in this area and surrounding the site in question, have not been serviced for several years.

The area is already underserved by buses as peak times and public transport is not available at the required level to accommodate for the existing community at large.

Currently school places are limited for both primary and secondary school students in the area and new facilities are needed in the area.

Statements from Dublin Fire Brigade unions state that crews are not equipped or trained to deal with fires in buildings above 8 stories and therefore, should the applicant be granted permission, there is a greater threat to the lives of those people in the units over 8 stories high.

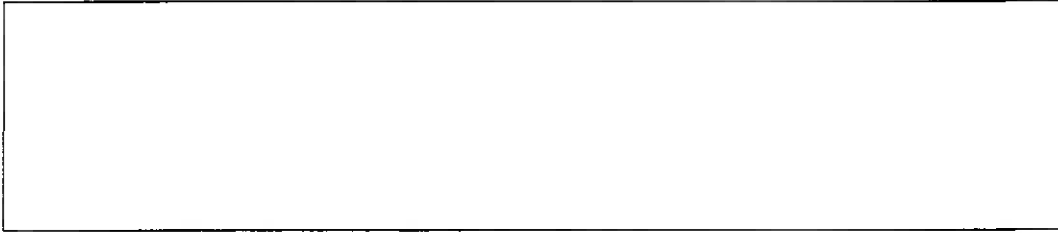
The lack of a local area plan is quite concerning given the number of large developments of late, and the LAP should be given priority as the area is being over developed.

The applicant failed to reinstate the area and grass embankment in the adjacent property, following on from the construction they completed there. They left the area in poor state throughout the entire construction process of Santry Place.

A left filter lane needs to be provided on the northbound side of Sword's Road, Santry ave junction. This area is a bottleneck which will be further congested should this application be granted permission.

Although there is merit in providing a small number of apartments at this site and there is potential to improve this location, I feel this application should be refused until issues outlined above have been addressed.

## 5. Grounds





## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

If your supporting materials are physical objects, **you must send** them together with your observation by post or deliver it in person to our office.

You cannot use the online uploader facility.

**Remember:** You can insert photographs and similar items in part 5 of this form – Observation details

## Fee

7. You **must** make sure that the correct fee is included with your observation.

**Observers (except prescribed bodies)**

- strategic housing observation **only** is €20.
- strategic housing observation **and** oral hearing request is €70

## Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☐

## Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020



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Initials		Initials	
Date		Date	

**Notes**

## Observations and submissions on the proposed Buckley/Chadwick's development by Dwyer Nolan.

Frank Keoghan,

25 Shanowen Crescent, Dublin 9.

Case reference: TA29N.314019.

Location: At the junction of Santry Avenue and Swords Road, Santry, Dublin 9.  
([www.santryavenueshd2.ie](http://www.santryavenueshd2.ie))

### Public transport.

"Urban Development and Building Height Guidelines 2018", enables increased building height and residential densities on sites adjacent to quality public transport routes and within existing urban areas. It is not possible at this point to determine whether Bus Connects will successfully run in the area. Metro North fell through over a decade ago after a lot of preparatory ground works had been completed. For this justification to be used, the Bus Connects would have to be operating successfully<sup>1</sup>.

If it does operate efficiently, then there will be increased uptake and as all buses serving Swords Rd in the vicinity of the development originate in towns in Fingal, they would be full – as they are at the moment, during rush - hour on reaching Santry –and would suffer delays on this stretch of road. See Appendix 3.

Swords according to the last census (2016), was the second fastest growing town in the country – after Saggart. A growing town has a predominantly younger population who are heavy users of public transport and as can be seen from the attached bus timetables, 41, 41c, 33 all pass through or are destined for Swords Village and are invariably full on reaching the stop at the proposed development. The 41b provides a single service at rush hour passing through Swords village. A large proportion of travellers on these routes between 8:00 and 9:00 are students of the various schools and colleges along the route south of Santry.

Even if there is an increase in capacity, the likely demographic in the proposed development, the adjacent Santry Place and the Omni site in development will put further pressure on that capacity. The 16 route from the airport can be expected to return to its crowded state when the pandemic regulations are relaxed. It was impossible to board that bus at Santry during rush hour and indeed – currently – after midday.<sup>2</sup>

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<sup>1</sup> From: **Coilin O'Reilly** (former DCC Local Area Manager) <[REDACTED]>

Date: Mon, Mar 8, 2021 at 9:22 AM

Subject: RE: Works in Santry

".....without knowing the final design of Bus Connects it is difficult for us to implement works as we fear we may be wasting limited resources in undertaking works that may be undone soon after."

<sup>2</sup> Despite Covid restrictions, this bus was full to capacity (all seating and standing room) on the three occasions I sought to use it after midday last week!!

The No 1 bus originates in the Shanard area, reaching the Swords Road at the Shanowen Road junction. This is the best option to ensure boarding a bus during rush hour but involves a walk of about 1Km and could not be considered 'adjacent' as expressed in the Guidelines but is the only bus originating in Santry. These statements can be verified by reference to the accompanying extracts from Dublin bus timetables which demonstrate a relatively high frequency (the applicant submits 'every ten minutes' and it should be noted that the Apartment Guidelines categorise these as 'reasonably frequent') at rush hour but in the experience of residents, a low capacity on reaching Santry Ave. and further south.

When addressing the issue of 'scale' the applicant makes the unsupported assertion that "The site is considered to be very well served by high capacity, frequent, public transport services, with excellent links to the wider Dublin area and therefore compliant with the above criteria. This can only be a personal opinion on the part of the applicant and would be contested vigorously by commuters and residents in the area.

No final decision has been made on Bus Connects; its eventual operation is currently thrown in doubt by a related industrial dispute and I submit that the consideration of permission for the development be postponed pending the initiation and operation of Bus Connects, as a major justification for the development and particularly for the conflict with DCC height guidelines, is the presence of a quality public transport route.

Neither is Santry close to a transport hub. If Metro North should eventually be built, the nearest station would be over 1.5km away, which couldn't be considered walking distance, particularly in inclement weather or in winter conditions along Santry Ave.

Splashing from passing trucks which use this as a peripheral route to the M1 and M50, threats of anti-social behaviour, the isolated nature of the route, particularly for women and the narrowness of the footpath all militate against the station being a transport option (hub) for residents in the proposed development. The 17a cross city service does provide a service every 20 mins during rush hour for part of the route to the proposed Metro station but the above caveats also apply to the remainder of the route.

Paragraph 3.2 of the Building Height Guidelines states that: "the site *is* well served by public transport *with high capacity*, frequent service *and* good links to other modes of public transport" (my emphasis). Thus, the site must currently be so served.

It should be noted that in the case of *Rita O'Neill Vs An Bord Pleanala*<sup>3</sup>, Judge Meenan stated; 'that the site must be currently well served by public transport' currently meaning 'present tense.' I submit that this crucial point made by the judge demonstrates that this proposed development contravenes the regulations as set for the SPPR3 height regulations.

This is supported by a similar judgement of Justice McDonald in [2020 No. 45 J.R.], "For this provision of paragraph 3.2 to be satisfied, I contend that the site must be currently well served by public transport as I note that the provision in paragraph 3.2 is expressed in the present tense."

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<sup>3</sup> <https://www.casemine.com/judgement/uk/5fa90b7b4653d019e70a17fb>

## **SPPR2.**

In addressing SPPR2 the applicant asserts that '[The CDP's vision for Z3 lands](#) seeks to develop such lands for the provision of local facilities, accessible via walking, with a limited range of services.'

Objective Z3 proposes in excess of twenty permissible uses, which I contend are presented as a range of desirable options, supported by a further number of 'open for consideration' options. Most of the foregoing, if provided, would create employment in the area and obviate the need for commutes. National Policy Objective 11 of the NPF states that - *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages,...."* This objective is addressed by the provision of five commercial (retail) units and a cafe at ground floor level in a development of 350 apartments with an average occupancy of 2.5. These six units could hardly be construed as providing a meaningful level of employment given the scale of the proposed development.

The applicant has opted for a minimalist approach that will not address the employment needs of the occupants nor of the area, does not satisfy Objective 11 and interprets Z3 to provide a veneer to justify excessive heights. The applicant states that: "It is therefore considered that the proposed development caters for an appropriate mix of uses, in compliance with SPPR 2 of the UD&BHG" The residential units provided are disproportionate to the services proposed in the development and the mix of uses so restricted as to render the term meaningless – though the proposed building heights are justified on this basis. I submit that the application should be rejected on this basis alone.

## **SPPR3.**

In addressing SPPR3, the applicant asserts that "The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport" and continues: "The subject site is also easily accessibility to the M50/M1 motorways, providing wider connectivity to other public transport options in the city". I have already dealt with the capacity issue but the applicants proposing that connectivity be achieved through use of the M50/M1 is not in accordance with National Policy Objective 64 of the NPF - *"...spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car,"* and suggests that this may be used as a selling point for the development should it be completed.

## **Height.**

At 3.2, the guidelines state that 'development proposals incorporating increased building height, ..... should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.' In the latter instance, the view south from Santry Demesne Public Park would be interrupted, if a 14 storey block were to be built on the edge of the proposed development while the block would be overbearing for motorists approaching uphill towards it from the north.

I submit that the development would not integrate into nor enhance the public realm in the area. The predominant housing type in the extended area is two-storey and while accepting that in the immediate vicinity, recent permissions have led to construction up to seven storeys, I submit that the heights on the



applicant's proposed development not exceed this and be of similar construction, (the applicant developed the adjacent site referred to) 'having regard to the topography'.

The applicant states on page 29/30 Statement of Consistency: The proposed mix of uses is considered to be appropriate and compliant with the Z3 zoning attached to the site which seeks to cater for a variety of convenience type units at ground floor level, with high density residential development above - seeking to place his own definition on Z3 zoning.

Z3 states: Neighbourhood centres may include an element of housing, particularly at higher densities, and above ground floor level. It is not prescriptive and refers to an element of housing, 'element' being defined by the OED as 'a necessary or typical part of something.' At no point is it suggested that housing be the dominant element even if it is clear that the intention is that housing be included 'at higher densities above ground floor.' These higher densities can only refer to; in excess of the predominant two storey housing in the area. Z3 is associated with the CDP which restricts height in neighbourhood centres to 16m.

It is worth recalling that during the last decade, similar tower blocks only a kilometre or so away in Ballymun were demolished as untenable, having given rise to multiple social problems. They were replaced by two/three storey residences. Serious mental health problems have been related to building height.<sup>4</sup> In an English study, mothers who lived in flats reported more depressive symptoms than those who lived in houses (Richman, 1974). Rates of mental illness rose with floor level in an English study (Goodman, 1974). Psychological symptoms were more often present in high rises (Hannay, 1979).

The original plans placed the 14 storey at the back centre of the site where its imposing height would have been somewhat attenuated by the surrounding 7 and 10 storeys. However, at the pre-planning consultation meeting of 03/12/20 the planning authority stated that it would be 'preferable' – without giving a reason – that it be located in the corner of the site at the road junction though they demanded a 'rationale' from the applicant if it were not placed there. Their rationale seems to be that it is a good site for a 'gateway' building. In the Planning Authority's Opinion 1/10/20 it was referred to as a 'landmark building signalling the entrance to DCC area and Santry village.' This concept was repeated in the Consultation Opinion and the Inspector's Report – no doubt, prompted by the Planning Authority.

The corner is at the junction of Santry Ave and Swords Road. The latter was formerly the main northerly route into the city but now is a main route only for busses and local traffic as the M1 is used by traffic from Swords and to the North and effectively is the entrance to DCC area from those regions. The boundary of DCC area is likely to change in the future and the vanity gateway project will be stranded. It is difficult to envisage how motorists will know it is DCC area and even locals disagree regarding the location of Santry village, the old village having been demolished. For these reasons alone, I submit that the 14 storey be scaled back as the reasons advanced by the Planning Authority

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<sup>4</sup> Professor Robert Gifford: "[The Consequences of Living in High-Rise Buildings](#)," in the journal *Architectural Science Review*. Dr. Gifford reviewed the literature on the psychological impacts of tall buildings on their occupants. His manuscript surveys nearly 100 studies that investigate whether high rises improve or diminish well-being and mental health.

are spurious and at best self – serving. And I would concur with the opinion of APB that the developer should consider “a reduction in height of Block A from 14 storeys to 11 storeys / maximum of 35 metres (with the top floor set back) - A reduction in height of Blocks D and E from 10 storeys to 7 storeys / maximum of 23 metres (with top floor set back)” while the taller building should be moved to the back of the site. However, the developer has ignored the APB request and made no attempt to comply.

This proposed development of 350 units, would join 120 at the Swiss Cottage, 200 at Santry Place, 324 at Omni Living; a total of 994 over a road frontage of less than 500m. With an average occupancy of 2.5 per unit, these developments would add just 2,500 people to this small area. The likely demographic suggests an increased pressure on schools, crèches and medical facilities, none of which are expanding near the location.

There is no primary school in Santry and the nearest boy’s secondary school is Aidan’s on Collins Ave. where you must have a sibling as a student if you are to gain admittance and Margaret Aylward on Thatch Rd for girls. In fact, there is no school with a Santry address! I am aware from a submission arising from a recent re-zoning application in the area that the Dept of Education is both aware of and concerned about this situation. Driving to schools merely adds to congestion at rush hour and parents in the development will have little choice given the present lamentable state of transport infrastructure – which I experience every day.

When the applicant got ‘no response’ from half the crèches contacted, it was left at that even though they may have gone out of business due to the current insurance pressures etc. I submit that the proposal to omit a creche from the development is not supported and should be rejected. This brings the whole community audit into question and I submit that it is not credible and should be rejected.

A holistic approach to development in the area requires an infrastructural plan to include transport and community facilities and though this is not the responsibility of ABP, its absence should be taken into consideration when assessing this application. **See Appendix 1**

At Santry Ave. density is proposed to be 233 Units per Hectare (UPH), in comparison to densities of 121 UPH in London, up to 150 UPH in Amsterdam, 200 UPH in Copenhagen and 225 UPH in Paris. (Dublin: 2.5 persons per dwelling 2016 census). Santry Ave. density is 650 people per hectare, compared to maximum slum densities of 450 people per hectare 2.47 acres) in Dublin in 1926.

The density of these buildings in the applicant’s proposed development presents a level of massing totally out of proportion to the adjoining recently completed development and also in relation to the surrounding area. It will present a canyon – like entrance to Santry with no continuity and conflicting designs.

#### **Traffic/parking.**



The Apartment Guidelines (2018) state: that for apartment developments *"the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances."*

The proposed development provides for 209 car parking spaces which results in a ratio of 0.6 spaces per dwelling, which the applicant considers to be appropriate given the locational context of the application site.

**Total new car parking spaces on this 458m of 2 lane road** - This proposed development 209; adjacent Dwyer Nolan development - 273; Omni Living - 162 and Swiss 32 **Total = 698**

I submit that in making a locational assessment, a holistic view of traffic and vehicle density in the area must be considered, aside from the fact that 0.6 spaces per dwelling seems high given what the applicant claims is a high frequency/capacity bus service at the location and where national policy favours elimination of car parking. The adjacent Dwyer Nolan development has 273, Omni Living 162 and Swiss Cottage 36. These when combined with this development's provision will result in a total of potentially, 698 extra cars on this 458 m of already congested road, perhaps twice a day. **See Appendix 4.**

The road reaches a single lane squeeze point – which will not be rectified if Bus Connects is implemented - at Shanowen Road traffic lights about 200 meters beyond Omni with traffic tailing back to the Omni traffic lights. Part of this tailback joins the tail-back from Shanowen Road traffic lights and often, the tail – back from Omni will reach the Santry Ave/Village junction causing problems for those coming off the motorway. This can be verified even through casual observation.

If we take the applicants figures of 140 (66% of possible maximum) arrivals and 160 (77%) departures at peak and extrapolate those proportions onto the 698 total for the location, the result in 448 arrivals and 514 departures. An additional 106 cars am peak and 114 at pm peak will be generated by the Omni Living development alone, which is about 300m away. These are the developers figures already accepted by ABP and may be found in **Appendix 2.**

Santry, and in particular the stretch of road from the junction of the R104 with the Swords Road down to the Flyover, cannot sustain this increase in traffic without infrastructural changes- given its current congested state, both North and South-bound. Major works are required on the Santry Ave junction and on Santry Ave itself – a narrow heavily trafficked road with heavy truck traffic off the M1/M50. This frequently results in traffic backup from the junction up to Aldi supermarket. The result is a rat-run through Shanliss/Shanard/ Shanowen down to Collins Ave. These cars travel very fast through the estate notwithstanding traffic calming and pose a traffic and pollution hazard. This situation can only be exacerbated by increased traffic generated by this development.

The Apartment Guidelines note that *"quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria".*

Furthermore, Section 16:38 of the CDP setting parking place standards (2016) explicitly states that they are ***"not intended to promote the use of the car within the city"***

If the applicant's claims regarding the availability of public transport are accepted, it is my contention that given the current locational traffic situation, that all car parking at the development be dispensed with as a condition of granting permission and if the applicants claims are correct, and I contend they aren't, then a condition demanding elimination of parking spaces would support the concept of a 15 minute city.

### **Fire safety**

**National Policy Objective 4 of the National Planning Framework seeks to:** *"Ensure the creation of ..... that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

According to Phil Murphy, co-author of [\*The Fire Risks of Purpose-Built Blocks of Flats\*](#) – one of many such studies, particularly in the wake of the Grenfell Towers disaster - says that it takes a fire brigade 20 minutes longer to begin to tackle blazes that break out at 20 storeys, than those on the ground floor. In England, the average time to get to the address is 7 minutes and 45 seconds. In Cork, fire brigades reach blazes within 10 minutes in just 40% of cases. Swords Road suffers from severe traffic congestion and Santry Avenue is even worse.

If we accept 10 minutes as a probable response time to a fire in the 14 storey or a 10 storey and another 15 mins to tackle the blaze, (in England, its 20 mins for a 20 storey) then if you are at the top of the block, you could be waiting up to 30 or more minutes after the fire has been notified. To compound this situation, the tallest ladders that the Dublin Fire Brigade has are 30 metres, which only allows them to rescue people at seven or eight storeys.

Dublin Fire Brigade has first to evacuate all apartment complexes because they cannot be certain that the building materials used were sufficiently fireproofed but if there are people trapped more than eight floors up; the highest ladder won't reach them.

Aerial appliances are machines with baskets that people can climb into. They are 33 metres tall and can rescue people from the eighth floor or below. There are only three in Dublin and only two are currently operational. The 14 storey would be 48.3m tall and therefore inaccessible using the equipment available to Dublin Fire Brigade. If engagement 'with the appropriate fire services authorities' was carried out as required, there is no evidence that this engagement is 'reflected in the design approach proposed.'

[The Fire Safety in Ireland](#) guidelines from the Department of Housing say that a crew of 11 to 13 fire fighters is needed for a high-rise fire with people inside. There would normally be 15 fire fighters at an ordinary house fire and high-rise fires are much more complex and labour-intensive.

While I understand that adherence to the fire regulations is not within the remit of ABP, ensuring compliance with the National Planning Framework is, and I therefore submit that given the current fire – fighting capabilities of Dublin Fire Brigade, the well – being of the future residents living above eight storeys cannot be assured and the requirement of National Policy Objective 4 is not satisfied.

### **Floods.**

During the last week there has been flooding on Swords Rd and Santry Ave. The proposed development is on a raised site relative to the Swords Rd but not currently towards Santry Avenue. A number of premises in the area including the Community Resource Centre across the road required water pumps to be fitted in their basements. This suggests that the water table is high and there are culverted/underground rivers in the area. The Naniken originates in the industrial area south of Santry Ave., before crossing the Swords Rd under the site of the old Garda Station to skirt the north boundary of Magenta and Burnside. This route is in close proximity to the southern boundary of the proposed development.

No evaluation of the effect of runoff in this context seems to have been undertaken - notwithstanding the use of passive alleviation measures - which would be significant from this site and would exacerbate the current situation. It is proposed to replace the existing 225mm diameter public surface water sewer located on the Swords Road with a new one of the same diameter originally designed to service the adjacent development. The intention is to 'share' this facility with the proposed development. I submit that this plan be rigorously evaluated in the context of the foregoing, prior to consideration of the application, as the area from Santry Ave to Magenta is frequently subjected to flooding, overflowing onto Santry Ave. The location is precisely in the area of this river. *See Appendix 5.*

### **Size mix**

The initial application for permission for this development was rejected because – amongst other issues - the apartment size mix did not meet requirements. The developer has made no effort to address this issue and seems to rely on ABP to overturn the decision.

### **Heat mitigation**

Global warming has been a recurrent feature of discourse during the past years as record – breaking temperatures have become a feature of our summers. [This article](#) from *Urban Climate* and particularly the map on pages 13/14 suggest that the site is within an area of high risk. Though there are many factors involved such as education level etc and these proposed buildings are oriented roughly N-S, the development could, under settled conditions, become a heat island. The developer should address the issue and it should become a requirement as part of the EIA for all future developments.

### **The bat survey.**

<https://www.batconservationireland.org/irish-bats/lifecycle> states that

‘An Irish bat typically becomes active in late spring and early summer.’

Met Eireann at: <https://www.met.ie/climate/climate-of-ireland> states that:

‘.. seasons are regarded as three – month periods as follows: December to February – winter, March to May – spring, June to August – summer and September to November – autumn. This is a common grouping in the meteorological practice of many countries in the middle and northern latitudes.’ It is reasonable to expect that the term ‘late’ in a chronological or a meteorological context would indicate sometime in May for the commencement of bat activity. We also experienced a ‘late spring’ in 2021- by a number of weeks - and this would not have been conducive to the emergence of bats.

However, a bat survey of the site of the proposed development was undertaken by Ash Ecology and Environmental on the 28th of April 2021, which I would contend provides a marginal opportunity to observe bat activity. The Assessor quotes a manual [published in 2006](#) as reference, which states that: 'Bat activity and emergence surveys are best carried out from mid-March .....' i.e. early spring – at variance with the position of Bat Conservation Ireland!

The last official survey of which I am aware identified three species of bat in the adjacent Santry Demesne and bat roosting boxes are still to be seen on trees there. [http://www.fingalbiodiversity.ie/resources/fingal\\_countryside/2006%20Woodland%20Mammals.pdf](http://www.fingalbiodiversity.ie/resources/fingal_countryside/2006%20Woodland%20Mammals.pdf) – the year in which the Assessor's reference manual was published. This was not identified in the desktop survey conducted by Ash ecology.

It suggests the likelihood of the presence of bats in close proximity to the site – if not on the site. The landscape suitability index of 25.89 just inside the northern boundary of the site and the Assessor's opinion under the heading General Activity Survey that: "it is a live retain site which would discourage most bats" but not all bats, would seem to support this likelihood. This is supported by the applicant's statement of consistency: *It is therefore concluded that the overall impact on bats, arising from the proposed development, will be most likely negligible if the general recommendations and specific lighting mitigation measures are implemented.*

The implication is that there may be bats that would be impacted.

The website ([www.nbdc.ie](http://www.nbdc.ie)) was accessed on 22/04/2021 to establish any previous bat records. This records the presence of bats in a 10km<sup>2</sup> Grid Square – a huge area relative to the area under consideration.

Evidence of bat activity to the immediate north; Santry Villas, emanating from the area of St Pappin's Church and derelict sack factory and immediately south of the site at the northern perimeter of Magenta Hall Estate, has been observed during the past week. This suggests that flight paths could be disrupted by the proposed development – in contravention of the EU Habitats Directive. These observers, whom I have spoken to, are willing to engage with ABP on the issue.

While not qualified to question the competency of Assessor, the discrepancies noted here coupled with evidence proffered by locals regarding the presence of bats, suggests that a single visit to the site only provided evidence that bats were not present on that night, which despite the temperature parameters being optimal, may not, in general be the case. A more comprehensive study is required to establish flight paths and verify or discount the local evidence and I submit that consideration of the application be postponed until this is completed.

### **Conclusion:**

In view of the foregoing observations, I submit that this application be rejected.

**Five Appendices are attached below.**

## **Appendix 1.**

**Current and pending developments within less than 2km of the proposed development – the distance used for the community audit.**

Swiss Cottage	112	336
Dwyer Nolan - opposite Swiss	207	621
Circle social housing - Coolock Lane - Mulhalls	32	96
Shanowen road - Milners Sq	147	441
Former Auto Glass site - Coolock Lane	5	15
Royal Oak - Lilmar site	53	159
Omni Living	324	972

Totals based on an occupancy of three per apartment

Total apartments - 880. Total extra residents -2640.

In Northwood, there is extensive development nearing completion

Bridgetown	216	648
Cedarview	104	312
Northwood Avenue	55	165
Westhill	198	594
Metro	608	1824
Northwood Green - houses	32	96
Northwood - Santry Avenue	332	996

Total apartments - 1545. Total extra residents @3 per unit - 4635.

These developments are within 2km of the proposed development and will add a potential ca. 7,000 residents to this small area centred on the junction of Swords Rd. And Santry Ave.

To this must be added the planned development of 1,000 units on the Oscar Traynor lands just around the corner, bringing another ca 3,000. A recent rejected rezoning of Shanowen lands @14Ha would have resulted in a huge number of additional new residents to the area with no additional infrastructural development. These are just some of the developments in Santry and I submit that the decision regarding the permission for the proposed development should be taken in this context, adopting a holistic perspective, as well as on the merits of the application itself

## Appendix 2

**Table 3.1: TRICS Data Summary, 324 Apartments - Proposed Scheme**

324 Apartments Network Hour	Car Arrivals		Car Departures		Total 2-Way Car Traffic Generated
	Per Unit	324 Units	Per Unit	324 Units	
Weekday AM Peak Hr	0.048	16	0.193	63	78
Weekday PM Peak Hr	0.175	57	0.063	20	77

**Table 3.2: TRICS Data Summary, 175m<sup>2</sup> GFA Restaurant/Café - Proposed Scheme**

175m <sup>2</sup> GFA Café Network Hour	Car Arrivals		Car Departures		Total 2-Way Car Traffic Generated
	Per 100m <sup>2</sup>	175m <sup>2</sup> GFA	Per 100m <sup>2</sup>	175m <sup>2</sup> GFA	
Weekday AM Peak Hr	0.000	0	0.000	0	0
Weekday PM Peak Hr	1.753	3	0.862	2	5

**Table 3.3: TRICS Data Summary, 260m<sup>2</sup> GFA Crèche - Proposed Scheme**

260m <sup>2</sup> GFA Crèche Network Hour	Car Arrivals		Car Departures		Total 2-Way Car Traffic Generated
	Per 100m <sup>2</sup>	260m <sup>2</sup> GFA	Per 100m <sup>2</sup>	260m <sup>2</sup> GFA	
Weekday AM Peak Hr	3.270	9	2.513	7	15
Weekday PM Peak Hr	2.326	6	2.842	7	12

**Table 3.4: TRICS Data Summary, 81 Room Apart-Hotel - Proposed Scheme**

81 Bed Apart-Hotel Network Hour	Car Arrivals		Car Departures		Total 2-Way Car Traffic Generated
	Per Unit	81 Units	Per Unit	81 Units	
Weekday AM Peak Hr	0.115	9	0.168	14	23
Weekday PM Peak Hr	0.136	11	0.106	9	20

Their traffic survey revealed that Swords Rd is relatively heavily trafficked; with a weekday AM Peak Hour Traffic Flow of 1,595 Passenger Car Units (PCUs) and a weekday PM Peak Hour Traffic Flow of 1,596 PCUs. This, on a two - lane road prior to the influx of traffic from Dwyer Nolan's development; Swiss development; Omni living and this Santry Ave. development.



## Appendix 3

### All busses passing the site leave from Swords or further north.

**41** – 8 busses pass the site during peak morning – Four of those during a 30 min period. (7:00 -9:00)

Times given are times leaving Swords.

#### Monday - Friday

07:00 07:05

d

07:15 07:30 07:40 07:50

d a d

08:05 08:20

d

#### Route Variations

a Via Glen Ellen not serving Dublin Airport (Route 41a)

f From Dublin Airport

d Does not serve Dublin Airport

**38 Mins to Omni**

Swords Manor >> 12mins >> Swords Village >> 16mins >> Dublin Airport >> 10mins >> Omni Shopping

Centre >> 15mins >> Drumcondra Rail Station >> 12mins >> Upr. Gardiner St. >> 3mins >> Lwr. Abbey St.

## 41C

#### Monday to Friday

07:00

c

07:15 07:25 07:45 08:12

c c c c

**Five busses pass the site during morning peak – four during a 45 min period.**

#### Route Variations

c From CBS school via River Valley -

**33** -two pass the site during morning peak hours (7:00 -9:00)

Journey time from Balbriggan – 1Hr 45Mins: Balbriggan » 15mins » Skerries » 15mins » Rush » 10mins » Lusk » 20mins » Swords Village » 10mins » Airport Roundabout » 10mins » Omni Shopping Centre » 15mins »

Buses leave terminus at

#### Monday to Friday

Balbriggan

04:45 06:35

**16** –Dublin Airport >> 10mins >> Santry >> 10mins >> Skylon Hotel >> 10mins >> Drumcondra Rail Station >> 10mins >> O'Connell St. >> 12mins >> Kelly's Corner >> 12mins >> Harold's Cross >> 12mins >> Terenure >> 12mins >> Grange Rd. >> 12mins >> Ballinteer (Kingston)

### Route Variations 16

**Five busses pass the site during peak morning (7:00 -9:00) Three of those during a period of 20 mins. Thereafter; one during a one hour period.**

#### Monday - Friday

07:00

s

~~07:10~~ 07:20 07:30 07:40

f s f s

~~07:50~~ 08:00 08:00 08:00

a h s

~~08:10~~ 08:20 08:20 08:30

f s

~~08:40~~ 08:40

### Route Variations 16

s From Shanard Road via Swords Rd. (Whitehall Church) Does not pass site

f From Collins Avenue via Beaumont Rd. and Shantalla Rd. to Ballinteer as 16 Does not pass site

h From Larkhill Does not pass site

b To City Centre only Does not pass site

a From Collins Avenue via Beaumont Rd. and Shantalla Rd. to City Centre as 16c Does not pass site

c From Larkhill to City Centre as 16c Does not pass site

d From Dublin Airport, departs O'Connell St.at 23:30



#### Appendix 4:



These pictures are from Google maps and were taken by an unbiased source with no interest in exaggerating the traffic situation. They were taken in 2020 presumably at a random time of day and prior to any development on the west side of Swords Road, as evidenced by the photo on bottom left.

## **Appendix 5**



**Flooding on Santry Ave.**







**Another day opposite the proposed development**





Eddie Bryce  
9, Lorcan Drive  
Santry  
Dublin  
D09PW86

**Original application :**

**Case Ref: TA29N.314019**

To An Bord Pleanala.

I have lived in the Whitehall / Santry area for the last 75 years and have watched various developments take place over the years not all that suitable and now I see a major housing development is planned at the Swords road / Santry Avenue junction.

Santry village infrastructure has not changed to any degree in my time, from the flyover to Santry Avenue only minimal road changes have taken place however on to this small stretch of road traffic from  
Shanowen Road, /Ave/Park/Drive, Oldtown Ave/Drive  
Shanliss road/,Walk/Drive/Ave/Grove  
Santry Way  
Shanard Ave/Road  
Shanowen Grove/Road/Park/Hall  
Shangan Rd/Ave/Gdns/Grove/Crescent/Green/Drive  
Santry Close/Villas  
Shanvarna Road  
Lorcan Road/Drive  
Majenta Hall/ Crescent. Schoolhouse Lane / Burnside

These are most of the old Residencies. Now, we add in all the later Residencies.  
Oak Park/ Green/Lawn,/Grove/Drive

Up in Northwood there are: Apartments

Lymewood Mews/The Beechs/The Alders/Carrington Park/  
The Elms/Parklands/Templecourt

Then in Gullivers we have: Apartments  
Cedars/Cedars View/Blackwood Square/Bridgefield/Little Harvard

Future on down we have Swiss Cottage Apartments / Santry Place Apartments  
Due are: Omni Apartments

We also on Shanowen Road have a large amount of Apartments under construction at the moment.

These are about 80% of the population who are been squeezed onto the same stretch of road that existed for the last 50 years

At the moment there is a rat run down and up Lorcan Road and Lorcan Drive as people try to avoid the traffic lights on Swords road. Our Bus service is under

intense pressure to cope at the moment what will it be like with all the extra people who will need public transport when schools reopen and when Covid restrictions are lifted.

All this has a knock on effect further on down the line.

Traffic from :Coolock, Beaumont, Whitehall, Santry all link up at the Collins Ave / Swords Road crossing and form a huge backlog of traffic which continues as far as Clonliffe Road before it starts to thin out.

Ballymun flats were demolished for many reasons one of them been the area without the proper infrastructure was too densely populated, therefore, moving the intense population from one end of Santry Avenue to the other is no answer.

I would appeal to you to send someone with expertise in traffic density out of the office and go and visually see the volume of traffic that is there at present and than in a couple of weeks when schools and colleges are back to check again and see the problem that people trying to get to work and people of my age have trying to get to hospital appointments on public transport, appointment times which are set by the hospitals. This highlights the huge problem that Dublin Fire Brigade and the Ambulance Service face when an emergency call has to be answered if someone has a heart attack or sudden illness, road or construction accident, fire, we should **never** forget what happened at **Grenfell**. Looking at plans only from the comfort of the office does not tell the true story.

I will just briefly touch on the stress that parents face trying to get children to school and than they are trying to battle traffic to get to their own employment. If we are to cope with increased population apart from the traffic concerns we must also think of our young children and our youth and give them proper and sufficient facilities that they can partake in and enjoy, it will be most unfair, unkind and unhealthy to expect them to stay in an apartment in their free time.

Please be guided by past mistakes, as I outlined we have enough problems at the moment to sort out, please do not exacerbate the problem by granting planning permission to this project but understand our existing problems and reject the application.

At present since the opening of the Swiss Cottage apartments it has become a regular occurrence for cars to park on the footpath at the apartments sometimes blocking the ramps specifically designed to assist wheelchair users and people with prams or buggies. I know this is not your problem but it illustrates that at present there is not sufficient car parking spots, without new developments adding to the problem

Yours Truly

Eddie Bryce



daa cuideachta phoiblí theoranta

Príomhoifig: Aerfort Átha Cliath, Co. Bhaile Átha Cliath, Éire  
daa public limited company

Head Office: Dublin Airport, Co Dublin, Ireland

T: 353-1-814-1111 | F: 353-1-814-4120 | W: www.daa.ie

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Date: 28 July 2022

Dear Sir/Madam,

**Reference Number: TA29N.314019**

**Site Location:** At the junction of Santry Avenue & Swords Road, Santry, Dublin 9 – occupying the site of the existing Chadwick Builders Merchants. The site is bounded to the north by Santry Avenue, to the east by Swords Road, Santry, Dublin 9. [www.santryavenueshd2.ie](http://www.santryavenueshd2.ie)

**Development description:** *Demolition of the existing building on site i.e. the existing Chadwicks Builders Merchants, construction of 350 no. apartments and associated site works.*

daa, Head Office, Dublin Airport, Co. Dublin, in its capacity as a statutory consultee under Article 28(1)(i) of the Planning and Development Regulations 2001 (SI No. 600 of 2001), makes the following observation with regard to the above proposed development.

#### Obstacle Limitation Surfaces

The site is located within the Obstacle Limitation Surface for Dublin Airport. As such, daa would recommend that no structure on site should exceed 112m above Ordnance Survey Datum (mean sea level, Malin Head). Furthermore, this requirement extends to any kind of rooftop development such as proposed plant or rooftop equipment, flues, chimneys, masts, antennae, parapet etc. and also applies to crane use (whether mobile or tower) during the construction phase.

#### Crane Use

The proximity of the proposal to the airport means the operation of cranes during construction may cause concerns in relation to air safety, and at a minimum, requires further detailed assessment in relation to flight procedures at Dublin Airport. daa requests that a condition is attached to any grant of permission, requiring the developer to agree any proposals for crane operations (whether mobile or tower crane) in advance of construction with daa and with the Irish Aviation Authority.

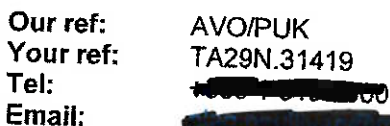
Should you have any questions or queries, please do contact us.

Yours Sincerely,

A handwritten signature in black ink that reads "Gary Mackin". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

**Gary Mackin**  
**Statutory Planner**





AN BORD PLEANÁLA

LDG: 055874-22

ASP: \_\_\_\_\_

04 AUG 2022 air

Fee: € 20 Type: cash

Time: 16:00 By: hazel

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

4 August 2022

Dear Sir/Madam

**Our client: Chadwicks Group Limited**  
**Re: Proposed SHD Development at Junction of Santry Avenue and Swords Road, Santry,**  
**Dublin 9 by Dwyer Nolan Developments Limited**  
**ABP Case Reference: TA29N.314019**

We refer to the proposed SHD development referenced above (the **"Proposed Development"**) by the applicant Dwyer Nolan Developments Limited (the **"Applicant"**).

We are instructed by our client, namely Chadwicks Group Limited, to make the following submission in respect of the Proposed Development.

## Introduction

As will be referred to in more detail below, our client operates a highly successful, large and essential builders' merchants and retail business premises that is located on the property which is the subject matter of the Proposed Development (the "**Premises**").

The Premises has been established for decades and on a continuous basis for in or around 34 years. The trade that throughout this period of time has been conducted from the Premises, serves the local community in Santry as well as the entirety of the North Dublin area.

We note that in summary and from information in the public domain, it appears that the Proposed Development relates to the construction of 350 apartments in four tower blocks at the junction of Santry Avenue and Swords Road, with the tallest such tower block being a proposed fourteen storey building. Among other things, the Proposed Development would include:

Among other things, the Proposed Development by the Applicant, as expressly stated at paragraph (1) of the Site Notice published by the Applicant, would involve the demolition of the Premises. It should be noted that (i) the

It should be noted that the Proposed Development, if it is permitted to go ahead, would result in not just the demolition of the Premises, but also the total destruction of the viable and thriving business that has been conducted from the Premises for decades and which serves the North Dublin area while also providing much needed long-term sustainable employment for the local community.

**Maples and Calder (Ireland) LLP**

75 St. Stephen's Green Dublin 2 D02 FR60 Ireland

Tel +353 1 619 2000 Fax +353 1 619 2001 Dlx13 Dublin [maples.com](http://maples.com)

Partners: Donna Ager, Elizabeth Bradley Nicholls, Butcher, Cathrina Carty, Stephen Carty, Brian Clarke, Ian Clark, N. Lynn Clamer, Robert Coenen, Fearghal De Pels, Adam Donoghue, Andrew Doyle, Mary Durnin, William Eganry, Sarah Francis, John Gallagher, Jonathan Green, Kevin Harrell, Philip Keegan, Margaret Kennedy, Craig Kennedy, Aislinn Kilgala, Dendie MacCarthy, Desmond Mawer, Donal McGinnis, Barry McGlothin, Dendie McGlothin, Stephen McGlothin, Edward McKeown, Clasp Monaghan, Aaron Mulcahy, Eimear O'Dwyer, Eoin O'Dwyer, Mary O'Neil, Niamh O'Shea, Aislinn O'Sullivan, Aislinn O'Sullivan, Patrick O'Sullivan, Andrew Quinn, Clare Pafferty, Lorna Smith, Peter Stapleton.

Our client also wishes to highlight that despite the catastrophic and indeed fatal effect that the Proposed Development would have on the Premises if it is permitted to go ahead, the Applicant has not attempted to consult or engage with our client in any meaningful way in respect of the Proposed Development.

It is also relevant to note that the Applicant purchased the Premises on or about 6 November 2019, and therefore has at all material times been on notice of (a) the Premises, (b) the business that is conducted by our client from the Premises, and (c) the long lease that is held by our client in respect of the Premises.

### **Summary of trading business conducted at Premises for over 30 years**

A builder's merchant business has operated from the Premises on a continuous basis for 34 years, and our client has owned and controlled the said business for in or around 28 years since 1994 pursuant to a long lease. The Premises occupies an area of approximately 3.48 acres and consists of an outdoor area that is used for trading purposes and a sales warehouse building with a floor area of 4374 square metres. The entirety of this area is integral to the business that is conducted from the Premises, insofar as the Premises (including outdoor area) is used for external storage requirements, servicing our client's collected business (as opposed to delivered), loading and safe circulation/operation. The Premises is one of the largest builder's merchants in North Dublin.

The principal business and customer base at the Premises is the sale of building materials and products to large scheme construction businesses and small to medium size builders. The Premises also operates on a retail basis to individual customers for DIY purposes.

The Premises has 22 full time staff with a high percentage having been employed at the location for over 20 years.

A large part of the enduring viability of the Premises is due to the convenient location and size of the Premises. This enables our client to hold high levels of stock which means that materials are readily available to customers without delay. The Premises has a high level of collected business, and stocks a wide range of products at the location and is well known for its product range and service. In particular the Premises serves small and medium size builders who carry out RMI work (Repair, Maintenance and Improvement) in the surrounding area. Again the location and high stock holding due to the size of the Premises, means that materials are readily available at the convenience of customers and without delay.

From a retail perspective, the Premises provides a wide range of goods and services that are sold to the customer base within the local community and the greater North Dublin area, including bathroom showrooms, doors and floors, a hire centre as well as an extensive range of hardware, paints and other DIY accessories.

The builders division at the Premises stocks key building components including timber, cement, block, brick and steel together with a wide range of heating and plumbing products.

The local community and housing developments in Santry were predominantly built and established between 1950 to 1970. Similarly, the business that has been conducted from the Premises for decades is also uniquely placed to support the large scale retro fit work that is required to take place in the local area over the next decade. This is also a key factor in supporting the State in meeting its sustainability targets and climate change obligations within that timeframe.

From a local community perspective, our client has also actively supported local causes and groups over the years. Most recently, our client was a main sponsor on the RTE DIY SOS show which renovated properties for those in need in the area.

As highlighted above, in the event that the Proposed Development is permitted to proceed, this will inevitably lead to the complete destruction and cessation of an essential business in the North Dublin area.

For the avoidance of doubt, in an attempt to mitigate its position and as a contingency, and strictly without prejudice to all of our client's rights and entitlements in respect of the long lease that it holds in relation to the Premises, our client has conducted exhaustive searches for a similar premises that could

service the same customer base and business that is conducted from the Premises. All of these searches have been unsuccessful. Put simply, there is no suitable alternative premises available.

Our client is therefore fortified in its view that if as a result of the Proposed Development, our client is required to close the Premises, this will quite simply result in the immediate and complete unavailability of all of the products and range of services that are carried out by our client at the Premises.

### **Specific Issues**

In addition to all of the foregoing, our client has been advised by counsel that the Proposed Development breaches the principles of proper planning and sustainable development in a number of important respects, including the following non-exhaustive list of matters.

1. There is a 'letter of consent' provided with the application, from Zoltorn Limited of Stonebridge House, Stonebridge Close, Shankill, County Dublin, dated 12 July 2021. It is not stated in the letter in what capacity Zoltorn Limited is providing the letter of consent. In particular, it is not clarified whether the said letter of consent is provided by Zoltorn Limited as the owner or controller of lands comprising, adjoining or affecting the Proposed Development and, if the latter, in what manner does the purported consent affect or relate to the Proposed Development? It is also unclear whether the signatory of the purported letter of consent is authorised by the company concerned, or in what capacity the signatory signs the letter of consent on behalf of the said company.
2. There is no evident confirmation of feasibility from Irish Water in respect of the Proposed Development, contrary to the requirements of the Planning and Development Regulations.
3. The Proposed Development is of excessive density, accommodating 350 residential units on a very limited site of c.1.5 hectares, or just over 233 dwellings per hectare. This is considerably in excess of usual development norms of 50 units per hectare. Moreover the Proposed Development is at a location that is already subject to heavy traffic in all directions and manifestly unsuitable for this quantum of residential development which will be located at a significant remove from the urban core.
4. The buildings are of excessive height relative to existing or proposed buildings at the location, which range from two to seven storeys in height, which will be matched and indeed greatly exceeded by the Proposed Development where the proposed blocks will range from 7 to 14 storeys, in what is identified by the Applicant as an "Outer City" location. In this regard, the Proposed Development will create an unacceptable precedent for future years in respect of development in the locality. The maximum building height permitted in such locations is 16 metres and the Proposed Development breaches this on a wholesale basis with building heights ranging from a (minimum) of some 22.9 metres up to some 48.3 metres.
5. The unit mix of the Proposed Development appears to be contrary to section 16.10.1 of the Dublin City Development Plan (2016-2022), which requires that a minimum of 15% of the units being provided are three or more beds. The proposed provision in the Proposed Development is a total of 19 units out of a total of 350 units, or just over 5.4%, well below the requirement of 15%. The number of one bed apartments is 113 out of a total of 350 units, or 32.3% of the overall, which is in breach of section 16.10.1, which requires a maximum of 25-30% of one bed apartments as part of a development.
6. There is inadequate separation distance between the blocks of the Proposed Development – see Blocks A and B, Blocks C and D, Blocks E & F and Block G which appear to have significantly less than the required 22 metres of separation between the respective blocks.
7. There is inadequate public and communal space provision, especially in terms of quantum which cannot be justified by any other consideration, including the availability of open space at Santry Demesne, which is available only by crossing a very busy main road, and especially is not suitable or accessible for spontaneous, unplanned, play by children residing at the proposed development.

The overall quality of purported open space provided is very poor, limited, fragmented and is not linked or contiguous to other areas of open space. The availability of open space on roof terraces on the seventh storey of three apartment blocks is an inadequate substitute for proper provision of open space at street level.

8. There appears to be very poor lighting availability at some of the floors on the proposed apartment blocks, reflecting the density and height of the proposed development. There is an open acknowledgment of non-compliance by the Applicant insofar as its application expressly states that *"We accept that some balconies and living rooms may not meet the BRE recommendations for sun lighting in certain locations at the lower levels of the development"*.
9. There is a significant under-provision of car parking - a total of 209 spaces, for an apartment complex with 350 units - at the proposed development which is purportedly justified by reference to the frequency of public transport (at the existing quality bus corridor) and proposed future Bus Connects developments, as well as the site location notwithstanding the express admission by the Applicant that the Proposed Development is at an Outer City location. There is no assessment of the adequacy of existing bus capacity to accommodate the likely number of residents at the Proposed Development, nor is there any consideration of the impact on existing transport capacity of the likely usage by residents of the adjoining permitted development, nor an assessment of the adequacy of public transport capacity to accommodate the combined demand of both such developments.
10. The assessment of social and community infrastructure is largely theoretical and unjustifiably favours "desk" research based on theoretical models of needs and place availability over the simple expedient of contacting local schools or GP practices to establish actual place availability. It does not consider the expected demand for childcare places, school places or medical infrastructure of other permitted developments (yet to be built) in the locality as well as those of the Proposed Development. This casts a serious doubt over the adequacy and credibility of the Applicant's entire analysis. It is also noted that the analysis was prepared on the basis of 2016 Census data, and one would expect that proper planning would require this analysis to be updated to take proper account of the most recent demographic data available from the 2022 Census.
11. The level of traffic analysis is very poor. The TRICS data relied upon appears to be unrepresentative and bears no relationship to the reality of traffic on the ground with which we are all very familiar. The traffic on the adjoining road network at the morning peak (in particular) is at a standstill, with similar traffic congestion at the weekends particularly for access to the nearby Omni shopping centre. There is no evidence proffered by the Applicant to suggest that the surrounding road network can bear the additional traffic generated by a Proposed Development and particularly a development at the impermissible level of density that is proposed by the Applicant.

### Conclusion

Our client is firmly of the view that, in accordance with the established and accepted practice and procedure, permission should be refused for any unsuitable development at a clearly unsuitable location, such as that which is proposed by the Applicant.

Our client believes that the above points will be of assistance to you in your consideration of the application for the Proposed Development and our client is prepared to expand on any of these matters should you so require.

Yours faithfully

*Maples and Calder (Ireland) LLP*

Maples and Calder (Ireland) LLP

**Case Reference Number: TA29N.314019**

I wish to make an objection about the planned development at the Chadwicks/Buckley's site on Santry Avenue, case reference number above.

I live in Santry and have been dismayed to see the imbalance between new housing developments and new amenities. In the last number of years, there have been a very large number of new apartments built in Santry Village, for example Santry Place and the apartments built on the Swiss Cottage site. However, there has been no corresponding increase in local amenities and facilities, such as schools, doctors, and so on. In addition, there has been a noticeable increase in traffic jams and tailbacks coming up the Swords Road towards Santry Village. The increased number of cars in the Village has a knock-on effect on traffic coming from Coolock Lane, leading to tailbacks and slow-moving traffic when trying to approach Santry Village from the North. The 231 new car parking spaces included in this proposed development will further exacerbate this problem. The increased number of commuters will also put pressure on an already busy bus system. A clear plan on how these issues will be addressed is required before proceeding with further housing developments in the area.

The proposed height of the building is a further cause for concern. Current proposals are for a 14 storey building. This is unreasonably high in a small residential village. Some of the recent developments have already dwarfed the existing buildings in Santry Village, and they are far below 14 storeys in height. This proposed apartment structure is almost as high as Liberty Hall – once the tallest building in Dublin – and would dramatically change the topography of the area, overshadowing the Village. In addition, Santry is very close to Dublin Airport, so there are undoubtedly risks to having such a high building in such proximity to the airport, in terms of aircraft flight paths.

In summary, my grounds for objection are that there has already been a large increase in the local population with no corresponding enhancement of available infrastructure, facilities, amenities and services, and a local community plan is required before any further approvals are given. In addition, the proposed height of this development is unfeasible for any small residential village, particularly one so close to Dublin Airport.

Catherine Doyle

17 Santry Close, Santry, Dublin 9.

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

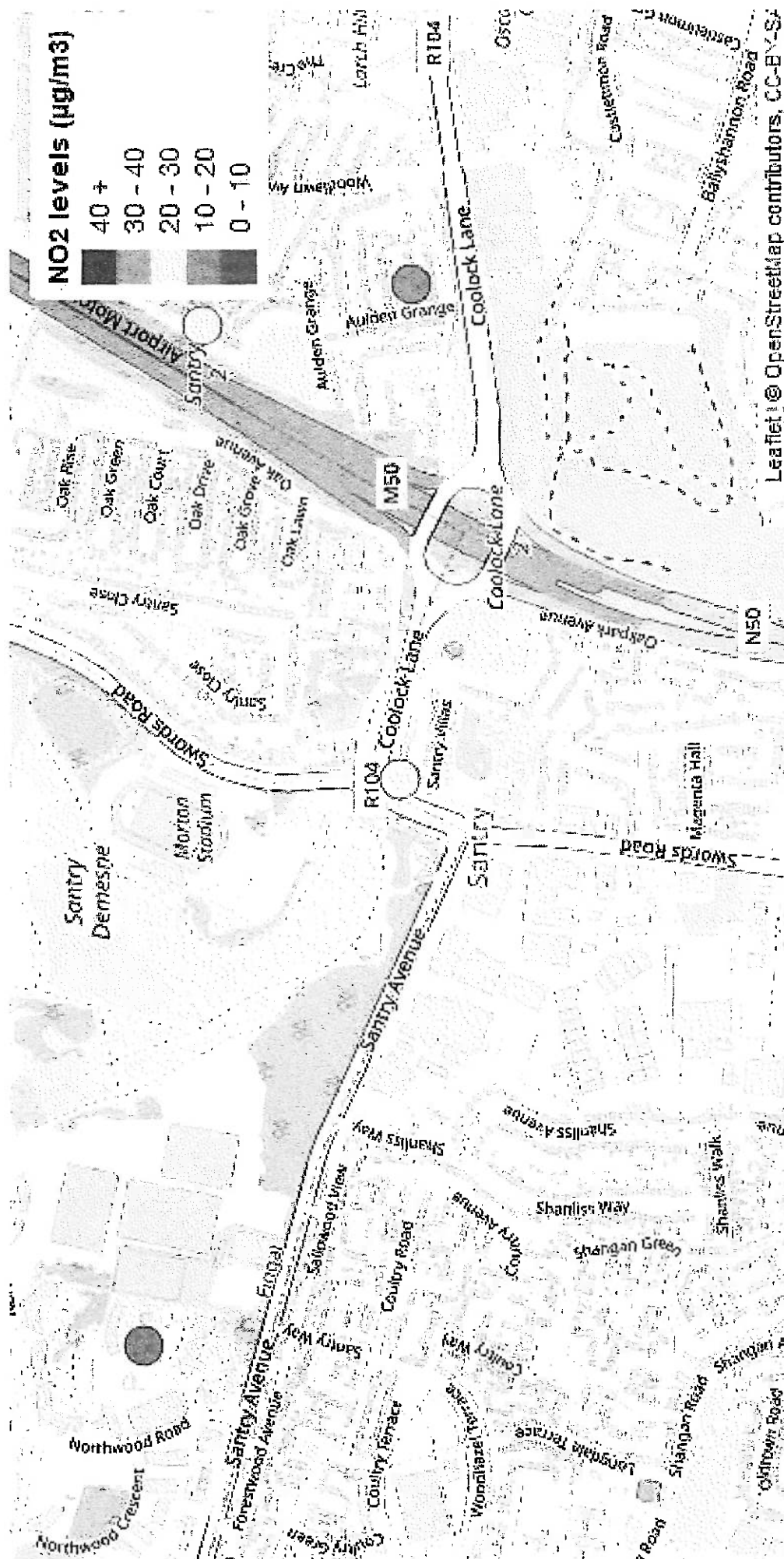
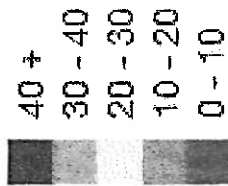
- Traffic already extends from Beaumont/ Shantalla to this junction at peak times
- Santry Avenue traffic extends beyond Aldi and from Coolock lane to this site coming from the M1.
- Bus connects intends to reduce this junction to one lane both ways instead of the one lane and slip road which is now 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.



# NO2 levels (µg/m3)





[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.

... everyone's health.

**What is being done and what can be done to reduce  $\text{NO}_2$ ?**

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>.

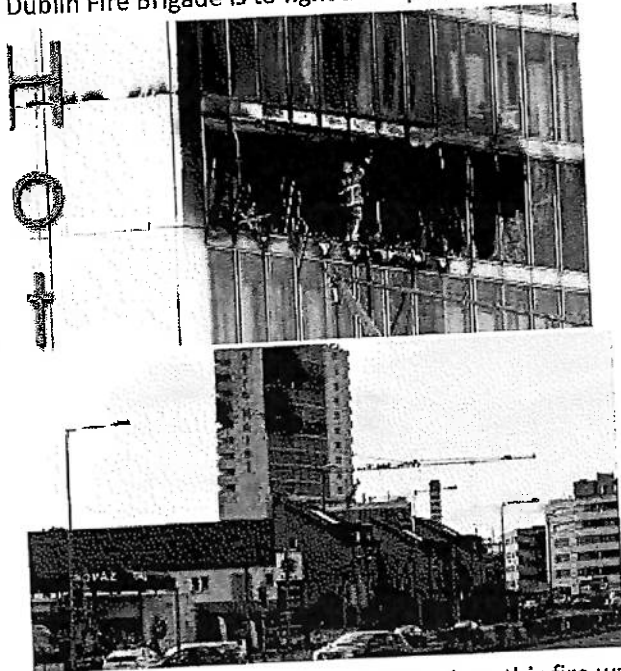
**YOU can** make an immediate difference by:  
 1. **Check the tires** before taking the car.

- U can** make an immediate difference by:
- 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

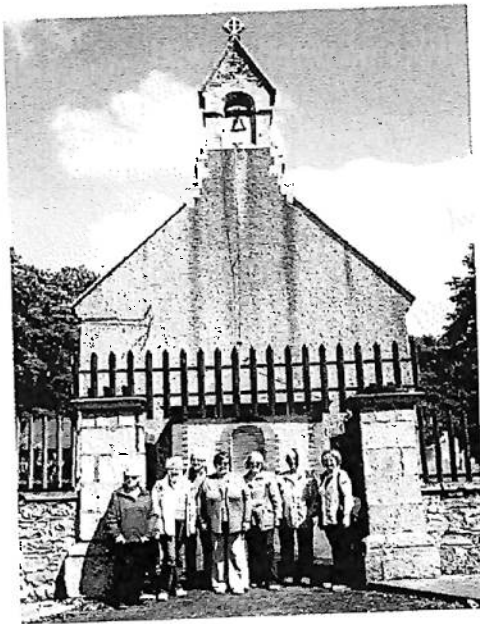
- Mass scaling and topography- the development is not the same as the picture used of the proposed development
- This type of design has already been turned down as phase two of Santry Place, DCC council refused planning permission for the 10 storey block in the middle of the development ref 2543/21
- 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

Barbara Lee  
9, Oakpark Avenue,  
Santry,  
Dublin 9  
D09TY79

  
7<sup>th</sup> August 2022

To whom it may concern,

***REF: CASE 314019 – CHADWICKS SITE – SANTRY AVENUE AND SWORDS ROAD***

I wish to lodge my objection to the above case. This case was rejected in November 2021. In my opinion there has been no change to the application and therefore should be rejected on the same observations which I lodged last year.

- To many apartments being built in the area which are not suitable for long term family living.
- Not enough schools being provided for.
- Public transport needs to be invested in first.
- There is a bat colony in the area.
- More doctors/dentists are required
- More amenities for the children of the area are required – Library, social club, safe play area etc.

Yours sincerely

Barbara Lee

Observation on the application of development at Swords Road junction with Santry Avenue

An Bord Pleanála case reference: TA29N 310910

Here are the points I want to make an observation on:

- Currently in Santry, and especially on Santry Avenue, the traffic is horrendous – implying it cannot take another potential 209 vehicles
- If this development goes ahead it rules out the possibility of widening Santry Avenue to the south
- Most buses passing through Santry are full at peak times and none start their journey in Santry
- Santry does not have any type of metro or dedicated bus service to cater for the influx of the increased population due to this development and all the others that have been approved or are pending.
- Nearby in recent years there was a fire in the a high rise building and the Fire Service did not have the capacity to deal with it. The capacity of the Fire Service in relation to fighting fires in developments this high has not changed.
- The occupants of a building of this height so close to Dublin Airport will surely be affected by aircraft fumes
- High rise living has been proven to contribute to adverse mental health
- Apartments (with long lonely corridors) contribute to isolation
- Bats use the Santry Demesne park – will they be affected by this development (i.e. have independent studies been carried out?)
- On the Swords Road section, at this site, there is often flooding
- Where will all these new residents work ? (any light industrial areas are going to residential developments)
- Will this contribute to the 15 minute city?
- The development needs not just a GP clinic but a clinic that could support many GPs - as there is a mass shortage and waiting lists in the locality
- Are there plans for a primary school in the near future as current schools are over subscribed?
- All of the facilities/amenities (schools, doctors, libraries, creches, youth clubs, community centers, etc.,) mentioned and required due to the MANY developments recently within 2 KM radius of this site
- It is shameful that the standards do not adhere to the Dublin City Development Plan.

- I would not like to have to reside in one of these high rise apartments, would you?? Just think of the implications of such high living
- There are many examples of sustainable developments of similar density without the need for 10 to 14 stories (the developers still are able to make their profit, and that is fine).
- I do not have any degrees in any aspect of town planning but I cannot see how this is good for any community, either the current residents of Santry or the future residents of Santry

Due to the above reasons and others, I respectfully request that this application be rejected until the citizens of Santry, Dublin City Council, Fingal Council and Government create a viable and sustainable plan for the area.

Regards  
Anne

Anne O' Rourke  
303 Swords Road,  
Santry  
Dublin 9



Ashgrove  
Coolock Lane  
Santry  
Dublin 17  
D17 T622

August 2022

The Secretary,  
An Bord Pleanála,  
64 Marlborough St.  
Dublin 1  
D01 V902

**Re: Case reference: TA29N.314019: At the junction of Santry Avenue and Swords Road, Santry, Dublin 9. ([www.santryavenueshd2.ie](http://www.santryavenueshd2.ie))**

**The proposed development provides for 350 no. apartments, comprised of 113 no. 1 bed, 218 no. 2 bed, & 19 no. 3 bed dwellings, in 4 no. seven to fourteen storey buildings, over basement level, with 4 no. retail / commercial units, a medical suite / GP Practice unit and a community use unit located at ground floor level facing onto Santry Avenue and Swords Road. A one storey residential amenity unit, facing onto Santry Avenue, is also provided for between Blocks A & D.**

**Dublin City Council Area-Strategic Housing Development Application**

**Dwyer Nolan Developments Limited (Applicant)**

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Dear Sir/Madam,

I wish to make the following observations on the above case. I make this observation in the context of the post construction experience of other related developments and or proposed developments with extant planning approvals, in the Dublin City Council area of the original Santry Village at the north end of Santry and its environs.

The context of this application should also include the associated existing developments/proposed developments in the SHD and non SHD process, or those with extant planning approval in the adjacent Local Authority Area of Fingal. The Fingal developments are concentrated in Northwood which is inextricably and historically part of Santry and the original Santry Village nexus and its environs.

This application should also be taken in context with the major DCC housing project contained in the Dublin City Development Plan 2016-2022 at the so-called Oscar Traynor Road Site which is also known as the Lawrence Lands and situated on the road shown on maps as Coolock Lane or the R104. This is the main route between Santry Village and Coolock. This is a major artery in terms of traffic if not in size. It is subject to major traffic congestion for large parts of each day and features on daily traffic reports. Santry Avenue is a continuation of this route also being part of the R104.

The Oscar Traynor development will be a major residential development of 600 -800 houses and apartments which will rely on the same infrastructure as the rest of Santry as despite its name (Oscar Traynor), it is part of the original lands of Santry and is historically and for practical purposes part of the hinterland of the original village and wider locality of Santry. I live on the original Coolock Lane east of the M1 interchange which has always been designated as part of Santry and was in fact in Dublin 9 for many years. There are several large residential estates in this area such as Aulden Grange and Woodlawn and Santry Court which are very much a part of the Santry community and gravitate towards the facilities and services of Santry. For the developer to disregard this portion of Santry in the narrative of the application and Architectural Design Statement and Community Audit etc is lacking in transparency and disingenuous in providing the full context.

## **UNSUSTAINABLE OVERDEVELOPMENT IN SANTRY**

### **Santry's Fourth Large Development in Material Contravention of the Development Plan**

#### **(4) Santry Avenue-current application - 350 apartments, 5 retail/commercial units**

The proposed development if permitted will be the fourth large apartment development either built or with existing planning permission and awaiting construction, all sited in a very small area of Santry. All four developments are on an approximately 450 metre stretch of the Swords Road between the Omni Shopping Centre and the junction of Santry Avenue and Swords Road. The site of this current



application is located at what remains of the oldest part of Santry Village, at the Santry Avenue/Swords Road intersection. It is right on the City Council boundary with Fingal County Council.

It is the fourth development, which, if granted permission, will be in Material Contravention of the Dublin City Development Plan in terms of

- Zoning
- Height
- Density

As with the three earlier development applications, this SHD application is also seeking to exceed the building height for the area as laid down in the current Dublin City Development Plan 2016-2022. This is a clear demonstration that material contraventions are systemic in the Planning and Development system and are being used to drive a coach and four through the democratic and considered process of the statutory Development Plan process.

Most importantly, this creeping undermining of the Dublin City Development Plan is not producing sustainable holistic communities. This is most acutely the case in both the Dublin City Council controlled part of Santry Village and in the Fingal Local Authority part of Santry Village in Northwood. The SHD process is permitting An Bord Pleanála to approve multiple applications for SHDs in both locations without proper consideration of the true needs of existing and future residents of both parts of Santry Village. It is total developer led planning and the people of Santry are merely incidental to the whole process. Developers are taking advantage of the unusual amount of light industrial sites in the village and the private ownership of a large part of the original Santry Demesne, to pack the area with mostly rental apartment blocks with no matching proper infrastructure that caters for Santry Village proper and the ever-increasing population. It is most indicative of the flawed process that the large existing residential population, a number of nursing homes, the Santry Sports Clinic and the Gulliver Retail Park within Northwood which are there for some considerable decades, have no public bus service within its privately owned part of the lands previously within Santry Demesne.

**There is a private bus service from the hotels just inside the main entrance to Northwood. It is telling that the long-term residents of Northwood are forced to trek all the way to the Swords Road for a bus service or out to the Ballymun exit to walk to the nearest bus service. This demonstrates the complete neglect of proper planning and infrastructural services when things are left entirely in the hands of a developer led process. There can be little confidence that this process can or will deliver integrated proper development for communities. The interests of communities must be defended and moulded by proper planning decisions that**

**do not compound an already failing oversight of proper necessary development both residential and infrastructural.**

**(1) Swiss Cottage – completed -120 apartments and 5 small retail units-Build to Rent Development**

**The Swiss Cottage** site was granted permission for 120 apartments and 4/5 small units on the ground floor for retail use. The development is one of the least intrusive of those either built or proposed for Santry. The retail units are right on the Swords Road at street level. Even so, only one of the retail units has been occupied 2 plus years after the development was completed.

The occupied unit is a coffee shop. The fact that the units are still largely unoccupied after 2 plus years, raises questions as to whether the typical high-flown rhetoric about the benefits of such developments creating a vibrant street level ambience are mere ticking of boxes for the planners. I would argue that the generic model of mid to high rise apartment blocks with a few retail units at ground level is a failed model of development and does nothing to build vibrant and sustainable communities. This is especially true of the development that has taken place in Santry Village to date. More of the same is not what Santry needs and is not conducive to the ambition of the City planners to build to the concept of a “15 minute city”.

**(2) Santry Place-completed 207 apartments, creche, community space, office/retail units-(Blocks A, B and C) -Build to Rent Development**

**Blocks D, E and F to be constructed yet. Further planning application with DCC to increase apartment number by 48 plus other amendments to Office Space permitted.**

**Previous application to DCC to amend remaining permission was refused on the grounds of it being inappropriate in scale and massing etc**

**The Santry Place** development was granted permission for 207 apartments, a creche, a community space and 5 retail/office units in Blocks A, B and C. This part of the overall development is complete and has been marketed but the retail units on the block along the Swords Road elevation are unoccupied some considerable time after completion. Again, this demonstrates that the model of development approved is not working and does not successfully incorporate the buildings into the area of the Swords Road for pedestrians and does not provide a place making function. On the contrary it does quite the opposite. The large bulk of the building is oppressive and does not retain or complement existing settlement patterns of the village. At various times in the day it obscures the solar gain for walkers and creates a canyon effect is

unpleasant for the public in contrast with the human and open scale of previous development there.

It should be noted that there is an existing and as yet unused planning permission for 3 further blocks D, E and F for Santry Place. There is currently a further planning application with Dublin City Council seeking to add 48 further apartments and to make other changes to the existing permission. This will if permitted increase density on that site and in combination with the Santry Avenue SHD site if permitted. Again, there is no increase in necessary infrastructure in the area.

### **(3) Omni Living -approved and pending development -324 apartments, 81 bed aparthotel and creche**

**The Omni Living SHD** was granted permission for 324 apartments, an 81 bed Aparthotel and a creche. The commencement of this development is pending. This development was granted with a Material Contravention of the Dublin City Development Plan 2016-2022 regarding height. It is zoned Z6 District Centre, nonetheless it was granted permission although it is a predominantly residential development which is not consistent with the obvious intent of the Z6 zoning. This proposed development has been given permission for a 12 story building on the Swords Road. Again it was posited as a landmark building as justification for the height and as a gateway building. How many landmark and gateway buildings does a suburban village on the extreme edge of the Dublin City Council boundary need? Planning authorities really need to consider the whole picture and prevent strategic takeovers of such villages by inappropriate piecemeal construction by developers in serial breach of the Dublin City Development Plan 2016-2022 for the area in respect of Zoning, Height and Density. Even one applies the 2018 Apartment Height criteria the transport measure SPPR3 was not met and the same is true for the current application at Santry Avenue and for Santry Place and the Swiss Cottage.

**(4) Santry Avenue SHD 2** is seeking permission for 350 apartments, 5 retail/commercial units and a community use building for residents. It is seeking a Material Contravention in relation to height and is clearly not in alignment with the intended type of development under a zoning Z3 and to the intelligent layman or woman in contravention of the intention of the existing zoning in the Dublin City Development Plan.

### **CUMULATIVE INAPPROPRIATE SCALE AND DENSITY**

The cumulative scale and density of these developments is oppressive and inappropriate in the small footprint of 450 metres length of the Swords Road. The massing scale and density of the combined developments dwarfs and overshadows

/will overshadow the village of Santry from Santry Avenue to the Omni Shopping Centre. The combined developments do not form a coherent, well planned whole. Those built so far are out of scale with the receiving environment and are monolithic in their cumulative effect. These already built developments together with the Omni development when built and the proposed Santry Avenue development if permitted, will have destroyed the character of the village. They do not pay any regard to the context, the established building pattern and scale of the existing dwellings in the old village area ie on the Swords Road opposite the Demesne section, Santry Villas and its green together with the village Church of St Pappan, the retail section of the road which contains the last Swiss Cottage building which characterised the original village, the houses in Schoolhouse Lane, the Magenta estate and onwards to the rest of Santry along the Swords Road. They have already and will further diminish the amenity of the established residential areas.

The existing buildings are already overbearing and detract from the light and sun in the village. The approved Omni SHD and this current development if permitted, will become even more overbearing and form a complete wall of incongruous, incoherent, and over densified buildings. The microclimate effects are already being felt by pedestrians on that stretch of road and it is no longer a pleasant and sunny place to walk or wait for a bus or cycle through. This wall of SHDs and other apartment blocks approved pre SHD in contravention of the DCC Development Plan re height is also creating a stretch of road which is not conducive to a feeling of security particularly at night as there is no connection to the buildings at street level which would could give some sense of security. This is in a directly opposite effect than was put forward by the developers when applying for permission for these developments. Much talk of providing linkages, bringing movement and placemaking etc. The developments have failed to provide any of these.

The retail elements of the Swiss Cottage apartments are vacant except for one unit. The retail units supposed to form a connection between Santry Place and the Swords Road are also still vacant. If these units are still vacant after a number of years why would it be a reasonable expectation that Santry Avenue SHD2 will succeed where the others have failed? This model does not work in practice and has been demonstrated not to work.

It is also surely relevant that an application for a development of the owner's lands at Santry Place in place of the already existing permission for blocks D, E and F, was recently refused as not being consistent with good planning. The full text of the decision is attached to this submission. I submit that the broadly similar considerations given for this refusal should apply to this present application which is arguably even more intrusive to the only remaining area of Santry Village that reflects its long and interesting heritage which has unfortunately been destroyed by extremely poor planning decisions or lack of a proper plan for the village. Santry Villas is the only

remaining element to reflect the heritage of Santry, apart from St Pappans Church which is a protected structure and the Pharmacy building which is the last of the Swiss Cottages that were a feature of Santry.

The design and pattern of Santry Villas and the Village Green in front of the estate reflects in its design the original rooflines and building a line of the original Swiss Cottages. This development would dwarf this pleasant estate and green space and the mature and valuable chestnut tree which gives it character. The residents of Santry have expressed a strong wish that the unsightly and now semi-derelict warehouses in front of St Pappans and beside Santry Villas could be re-developed by the Council into a more fitting public space for the village that would encompass elements that would represent the valuable lost built heritage.

To permit such as discordant and oversized development at the edge of the county and city boundary in such an unsympathetic manner would be crass and not represent good planning or respect for the existing residents and the context of the area. The development as a whole and a 14 storey or even an 11 story building as requested by the Planning Authority at the pre planning application consultation with the PA and ABP, will loom over the Park, the Village and the approach road to Santry in a jarring manner. Rather than being a landmark it will be an eyesore. I note that the applicant has ignored the request at the pre application consultation, to reduce the 14 storey building proposed to 11 storeys. This part of the Swords Road and Santry has been bypassed long ago and does not need a landmark building to announce the arrival at the city limits!

The gradual transition along the Swords Road at the Northern end of what was the full Demesne and its lands marking the progress from county to city is clearly enough signalled by the increase in residential property gradually increasing in density as one travels south to the city.

The Swords Road through Santry is not a main artery to the city any longer. It was bypassed for a reason-capacity was limited and the already increased density of housing made the capacity issue more pressing.

The lack of capacity for more traffic is demonstrated by the fact that many of the long-standing houses between the Omni Shopping Centre and the flyover at the NI junction at Shantalla Road, are to lose parts of their front gardens by CPO to facilitate the Bus Connects project. These CPOs will only marginally improve the situation and will likely be negated by more traffic generation by over densification of the Northern end of Santry Village. The East West congestion on the R104 will also worsen if this development is permitted whatever the submitted reports say. The applicant's Architectural Design Statement acknowledges the traffic filled nature of the roads right at the point they wish to develop. They can't have things both ways. They push

the excellent road links to the M1/M50 and Port Tunnel and Dublin Airport but downplay the existing and very real on the ground problems of traffic congestion in all directions, poor road infrastructure, poor public transport links and capacity. In point of fact, to access the Port Tunnel one has to drive north on the M1, negotiate a major interchange over the motorway to come back southwards to enter the tunnel! Hardly easily accessible for residents who wish to access it from Santry.

The development as planned is completely out of place at this part of the village. It will dwarf the last remaining part of the village's character at a sensitive location. Building heights and densities at this point where Santry Demesne marks the transition from the DCC area to the Fingal Council area are characterized by open space, parkland and low density and height along the Swords Road. The development planned is jarring and insensitive in design in terms of height, density, overall design and placement. Taken with all the other development on that part of the village the cumulative effect is of a solid wall of large blocks of buildings with no demonstratable gain to the village in terms of placemaking in the true sense of the term in the planning context.

Other brief comments:

- Injurious to the preservation of the heritage nature of the adjacent COI Church of St Pappan.
- Santry Villas could also be considered as one of the oldest parts of Santry Village in terms of its built heritage. The Villas have echoes of the original Swiss Cottages in their design and placement. The green space in front of Santry Villas serves as a type of Village Green space with a very large very mature Chestnut Tree.
- Santry Residents are anxious to have the derelict warehouses near the church removed and a more sympathetic use of the space in keeping with the heritage nature of the church and St Pappan's well which has been hidden by the ugly and now vacant and derelict warehouses. That the warehouses were permitted there at all is a planning aberration in itself and should never have been permitted.

## **ROAD AND TRANSPORT INFRASTRUCTURE & BUS CONNECTS**

The necessary road and transport infrastructure are not and will not be enhanced by a further oversized development at one of the most sensitive points in the old village. Traffic is already a problem on the Swords Road which is a Regional category road and not a National category road. The proposed Bus Connects plan if fully implemented will worsen the traffic situation and the cumulative effect of the additional traffic from the Omni, Santry Place and Santry Avenue developments will compound the situation with all the adverse consequences. Indeed, the road is so inadequate in places in width that Bus Connects will have to CPO front gardens of houses to make way for bus lanes and cycle lanes. At one point the cycle lane will divert into Lorcan Estate as there is not enough space to fit lanes in safely. Bus Connects has also proposed that the filter lane turning left from Santry Avenue onto the Swords Road heading North should be removed. This will exacerbate the traffic build ups and delays for traffic on Santry Avenue which already has serious congestion issues much of the day. Santry Avenue is essentially a two-lane regional road which dates from the time of much lighter volumes of traffic. It is not built to carry the present volumes, let alone the extra volumes from Santry Place, Omni SHD, Swiss Cottage and the Applicant's development should it proceed. There are no bus lanes on Santry Avenue except for a very short one near the Ballymun end of the avenue which is the R104. There is no apparent scope to widen this narrow road.

I have previously (with the first Santry Avenue SHD application observations) enclosed a disc with screenshots taken pre pandemic from the version of Google Street View available at the time Swiss Cottage development was about to commence building. The hoarding can be seen in one of the screenshots. As can be seen there was already a regular build up of traffic on the R132 Swords Road from Santry Avenue junction to the Omni Centre and beyond to the Swords Road at the proposed Hartfield SHD at the Collins Avenue/Swords Road junction. Google street view usually operates when the traffic is lighter, so this volume is a mild version of peak times. The weather is dry and sunny. During wet weather traffic volumes increase and traffic is much more congested. To say there are good links to other transport links is inaccurate if you factor in the distance to the nearest railway link in Drumcondra 4 k away per the Applicant. There is a pinch point at the bridge over the N1 which has little scope for widening if any. The N1/Swords Road are always very heavily trafficked and the access to this section of the road to the City Centre is difficult and slow. In any event the Applicant cannot rely on the proposed Bus Connects development as it is still at the planning stage. Nor can the applicant rely on the contention that the proposed development fulfils the criteria laid down in the Section 28 Guidelines on Building Heights and in particular the criteria that-

*“the site is well served by public transport with **high capacity, frequent service and good links to other modes of transport**”.*

The High Court has upheld this point in the case of Rita O'Neill v ABP and Ruirside Developments Ltd High Court 2020 No 45 JR Judgement of Justice Denis McDonald on 22 July 2020.

The learned Judge held that the Applicant was required to and failed to demonstrate that this criterion was met. There was no readily accessible rail link or links to other modes of public transport at the time of the application in Ruirside's case and they did not meet the SPPR 3 criteria satisfactorily. Thus, under the guidelines the applicant's site must be **currently** well served by public transport with high frequency and high capacity and must, **currently** have good links to another form of transport. There is no Luas or Dart in Santry or nearby/readily accessible. There is no readily accessible rail link. The proposed Metro North has already been delayed/shelved twice and is deferred again. It does not exist, and it may never exist. Even if it is built it will be in Ballymun and in the Applicant's own report with the first SHD application puts the nearest proposed stations at 1.4k and 1.6k distance and walking time of 19/20 minute. This is an optimistic estimate of the walking time unless you are young, fit and unencumbered by children in buggies and/or on foot or you are otherwise unable to obtain the briskest pace.

Cycling is not an option for many people for many, not least the aged, disabled, or wheelchair users. Indeed, bicycle thefts have been a frequent and real hazard in the district and especially around the nearest proposed station at the Ballymun end of Northwood in Santry Demesne. It is a frequent occurrence at present that adult fit males are relieved of their bicycles by gangs in and around Santry Demesne. There is little or no Garda presence to deter such activity.

Regarding existing bus services, it is true there are several routes which pass through Santry to the City Centre and across from Kilbarrack to Finglas Village where **a bus change is now required to bring users to Blanchardstown**. Previously before new routes under Bus Connects this bus change was not required. None of the routes originates in Santry and it is a normal feature that buses are full by the time they reach Santry. This is particularly the case as many of the routes emanate from specific estates in Swords or from the Airport or from places as far as Skerries and Rolestown. It has always been the case that when buses reach Santry they are full or almost full and have **limited capacity**. The Applicant has not factored in the large residential population of Northwood which is also part of the general Santry Village catchment area right beside the proposed development, in any consideration of capacity of the public transport service. Frequently many passengers can board at the bus stop across from the main Northwood entrance which is opposite Santry Close. As buses serve the Airport there are larger bays for luggage in the Airport bus route. This also reduces



capacity for passengers boarding at Santry. Northwood is still growing in terms of developments in progress and applications for planning permission for SHD and other residential developments. None of this has been factored into the application. The Applicant has however seen fit to use Northwood Census data to demonstrate the reducing level of potential car ownership in Santry! This is disingenuous and frankly lacking in transparency and is cherry picking to suit the case. The Applicant has not factored in any of the potential or ongoing developments in Northwood or indeed the existing population there in any other assessments as far as I was able to ascertain from the copious documents submitted to the planners. On the other hand, there is more cherry picking from “facilities” in Northwood to bolster the Community and other audits/reports. The non-existent Metro North is also used by the applicant though it is still unclear when if ever it will exist.

It is worth making the point that the R132 through Santry is no longer a main route to the city having been bypassed by the Santry bypass and the N1 / M1. Indeed the Planners and City Council had the foresight to set aside land for this bypass decades in advance when the earliest private developments were taking place. The estate of Lorcan is bisected by the bypass. It surely is incumbent on those assessing current planning applications to have equal consideration and foresight on Santry’s current and future needs and not cede everything piecemeal to private development with no provision made for housing for the elderly, road infrastructure, school infrastructure, HSE primary care centre, library, cultural community needs such as exist in Ballymun,

### **ACCESS TO FINAL DEVELOPMENT**

The developer states that there will be access to Swords Road via the Santry Place access point. This is surely not permitted without explicit and distinct planning permission. The extant permission to access Swords Road applies to the Santry Place development only. This is a sleight of hand avoiding a proper consideration of the suitability of using this access point in a transparent manner.

### **FLOODING**

Santry has a long history of flooding which still occurs. Any further major development is likely to put further pressure on an already problematic drainage system in the Village. I previously enclosed a disc with links to Videos of severe flooding and articles in relation to regular major flooding events in Santry that are not mentioned by the applicant in the Planning documents. The videos and articles speak for themselves. They were easily found with a quick google search and should have been discovered by the applicant and disclosed. The disc was submitted in observations to the first Santry Avenue SHD application.

## **MICROCLIMATE ASSESMENT**

I note that an assessment has now been submitted with this second application. It is interesting to note that this has only now been provided when the issue was raised in my previous observations on the initial failed application. This is yet another example of the cynical attitude of the developers towards the whole planning process. If this application was for South Dublin or similar areas a hugely detailed report on this topic and all other relevant issues would be submitted as standard. It seems that anything is good enough for Santry in the developers views and there is no equality of expertise on behalf of the current residents or future residents who may live in developments in the area.

## **BATS**

Local residents have confirmed that they regularly see bats in the are of the St Pappans Church. Their flight paths take them across to Santry Avenue and the edge of the Demesne and the general area of the Heiton Buckley site. The applicant has failed to disclose this if aware of it. The author of the Bat Survey while stating that there was no evidence of Bats in the building to be demolished, does not appear to have been aware of the existence and regular flight paths and foraging areas which must be affected by such a large development. A more comprehensive study is needed. I may be mistaken but I think the original survey has been resubmitted and is dated 2021.

## **INDUSTRIAL HERITAGE BUILDING**

As has been noted by the DCC Inspector in the first SHD application for this site, there is an attractive Industrial Building on the site which is due to be demolished. This building is of Industrial Heritage value and should be retained and re-purposed for a cultural or community use that would enhance Heritage history of the Village. If the warehouses at the Church were sensitively replaced by a suitable building such as a library or other cultural use it would enhance and retain some of the rich history of the area and complement the Santry Demesne history. The site is right at the location where the small amount of the original village heritage remains. As such every effort should be made to incorporate the building on site and it should not be demolished.

## **DEFICITS**

Santry has no Public Library.

No Primary Care Medical Centre  
Insufficient GP capacity

No Public Swimming Pool

No Cultural facilities such as exhibition area or theatre/performance areas which would facilitate local drama groups and performers and other entertainment media. A multiplex cinema is not sufficient cultural provision for the full range of the population of the area.

No provision of school places in Santry

## **CAR PARKING**

The reduction in available car parking within the development is problematic for the residents of the development and for residents of the roads and estates adjacent to the development and in the general Santry area. It is the case that already, residents of Swiss Cottage Apartments are overspill parking in Magenta Crescent and other roads and location to the detriment of residents. This is a common complaint throughout Santry and Northwood. Overspill parking is a real hazard when it blocks access for emergency vehicles, ambul

ance or other transport for residents who have disabled or mobility impaired family members who need ready access to their homes. This is a real issue, and it has been raised by residents in previous submissions on the Omni and other planning applications. When the Swiss Cottage and Santry Place developments were ongoing the workers on the developments were parking all over the Santry village area and further afield causing nuisance and difficulties of access etc for residents. I note that the workers on the current application if permitted are to park onsite only and forbidden to park elsewhere. This demonstrates that parking overspill is a real planning consideration which must be addressed in balancing any decision. It is a regular issue on the Northwood facebook page where residents are regularly looking for parking spaces to rent in Northwood. Planners must plan for what is necessary for residents old and new to live in a reasonable and predictable environment.

## **GENERAL** **INFRASTRUCTURE DEFICITS**

On the one hand the applicant and government policy and planners point out how these proposed developments are adjacent to the M50 and Port Tunnel and then fail to face the realities of the necessity of car ownership and use for many to commute to work, schools, medical facilities after school activities all based outside the Santry area! With the best will in the world inadequate social infrastructure and transport will not lead to the desired reduction in car traffic and parking needs. Time poor parents

and carers of elderly or mobility impaired family simply cannot travel everywhere by bus. All of the schools and many essential services such as doctors and medical services are insufficient to the present needs of the population in the immediate and slightly wider Santry area. The only school to have been established for Santry in Santry is the Gaelscoil which is at the very edge of Santry across from where I live. At the risk of being flippant and disrespectful which I do not intend, I believe that the Gaelscoil may be the only school established in Santry since the Santry Charter School in the days of Ascendency, a considerable time before the founding of the State. To get to the school on foot or bike children and their parents must cross the M1 interchange with no pedestrian crossing or effective traffic calming measures on traffic exiting and entering the M1 and M50. There has been no apparent infrastructure audit by the planners on the needs of Santry residents. The planners are required to be proactive in this regard under the terms of the Development Plan. Incidentally the Gaelscoil is beside the land earmarked for a major DCC development known as the Oscar Traynor SDRA which is planned to accommodate some 600 housing units if it ever happens. This development as planned was in fact a model of the type of balanced development that should be happening in Santry Village. It was to have a mix of housing types and ownership and varied building heights. Unfortunately, the designers of this masterplan have not been deployed in Santry Village.

## **MATERIAL CONTRAVENTIONS-CURRENT APPLICATION**

- 1 The proposed development if approved would be in Material Contravention of the Dublin City Development Plan 2016-2022 in relation to the proposed height and density of the development. The justification case by the Applicant for such a Material Contravention is not valid.
- 2 The proposed development if approved would also be in Material Contravention of the Dublin City Development Plan 2016-2022 in relation to the proposed development which is primarily a residential development and **not a development appropriate to the zoning of the site as Z3 Neighbourhood Centre.**
- 3 However, it is clear from the any ordinary reading of the text of the City Development Plan that the Z3 zoning is not intended to be for a substantial and primarily residential development. **Residential elements if present in applications for planning permission in areas of Z3 zonings are clearly intended to be only an element** of any permitted development and not the principal and very substantial element of the size and nature of an SHD development. SHDs must be a minimum of 100 residential units. I would argue

that, even if the proposed development was for 350 two story houses, with 5 small retail units it would still be in breach of the specified Z3 zoning. This development is for 350 apartments and the only non-residential elements are 5 retail units. The development is overwhelmingly residential (90%).

- 4 This application in a Z3 zone could be described very much as the tail wagging the dog. Put another way it reminds one of the much criticised ad campaign by Saatchi and Saatchi in the UK for the V&A Museum which had the tag line : “an ace caff with quite a nice museum attached” . An adapted version would be an ace neighbourhood centre with a nice SHD attached.

The zoning signals the nature and appropriate use of any site designated under the City Development Plan. The zoning does not designate the height limits of a piece of land.

The Ministerial Guidelines under Section 28 of the Planning and Development Acts as amended are relied on by the applicant in relation to the height of proposed developments. The guidelines do not entitle An Bord Pleanála or any other body to disregard the zoning of a site completely and systematically, in contravention of the zoning designated under the Statutory Development Plan. Any change of zoning is a reserved function of the Councillors of Dublin City Council and as such the zoning may only be changed by the Councillors. For An Bord Pleanála, or any other body, to permit a development that is so clearly in contravention of the Statutory zoning, is I contend, “*ultra vires*”. To do so four times in succession, for four separate developments in a 450-metre stretch of the Swords Road at Santry Village, is a systemic disregard for a Statutory City Development Plan and an abuse of what I understand is meant to be an exceptional use of Material Contravention.

To illustrate my point, in March 2020, the CEO of Dublin City Council brought a series of proposals for variations to the zonings of many sites, across all areas of Dublin, to the Councillors of Dublin City Council for approval. Two of the sites for consideration were in Santry. Both sites were proposed to be rezoned to Z1 Residential from their current zonings of industrial use designations. If the CEO of DCC felt that there was no problem with permitting residential use or developments on lands that were not zoned Z1 why go to the trouble of seeking to have the zonings varied? It is presumably open to the owners of the lands the subject of this planning application and others like it to seek to have the zonings changed to Z1 Residential to permit an orderly and transparent process which would be subject to public consultation and the consent of a majority of the Councillors. To simply ignore the obvious intent of the existing zoning as designated in the Development Plan is not in accordance with good planning and sustainable development processes. It appears to be a systemic back door

process to subvert the democratically legislated zoning processes. For it to happen so frequently, especially in one small area is not good practice or transparent.

I submit these observations for your full and considered attention please and enclose my fee of €20

Yours sincerely,

---

Anne O'Neill

**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.<sup>1</sup> 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.

<sup>1</sup> 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 28<sup>th</sup> 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 Clontarf 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 10<sup>th</sup> and 13<sup>th</sup> 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 air<sup>2</sup>. 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:

**NAME** Angela Hayden

**ADDRESS** 6 Santry Villas, Santry, Dublin 9

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

<sup>3</sup> 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



**AN BORD PLEANÁLA**  
LDG- 05606 7-22  
ABP- \_\_\_\_\_  
09 AUG 2022  
Fee: € 20 Type: Carol  
Time: 14:20 By: hannah

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.

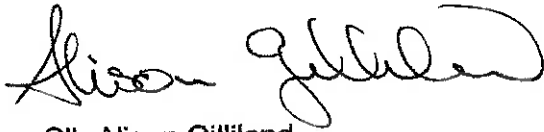
This is not the case for the individuals and families that would live in this development. Of particular note is the lack of primary school places or primary care for the majority of new residents - basically any new primary school age child to the local area, a possible 200 - 500 in this development 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,

A handwritten signature in black ink, appearing to read 'Alison Gilliland', with a stylized, cursive script.

Cllr Alison Gilliland

36 Oakpark Ave

Santry,,

Dublin 9

3.8.22

Ref; 314019 Heiton/Buckley Site Santry

To whom it may concern;

I wish to strongly object to the above mentioned proposed development. To this end I enclose the required fee of €20.

The reasons for this objection are many, but to name what I feel are most important.

To date, this area has already been extremely over developed with and in fact if all the proposals were to go forward, we would have a population on par with Co. Kilkenny. To date, so many older people have had to move out of the area because they felt completely overwhelmed with the impact the apartment blocks have made. Some of these people were actually born and raised here in Santry

This area has not, structurally changed since the days of horse and cart. They are still the original roadways.

The infrastructure has not grown in line with the developments to include, schools, crèches, and medical facilities.

Visually, fourteen stories in this village will seem incongruous, not to mention depressing, as it will fail to integrate or enhance the character of the surrounding area

With the demolition of the Heiton/Buckley builder providers, this will take a lot of employment from the area, which cannot be replaced.

This business is very much utilised by locals, so when it is gone it inevitably means more travelling by car on already congested roads, which will in turn contravene the present 'Climate Change' agenda.

I believe the building of these multi storey apartments, contravene current climate change agendas, as most new apartments have no alternative but to use dryers, although given the energy prices, people will also dry clothes on radiators, which in turn lead to health problems.

It is well documented that this type of high rise buildings are not fit for proper quality of life, as was proven during the 'Ballymun Towers' era.

I cannot stress enough how strongly I feel about this objection and hope you can honestly give this the attention it merits.

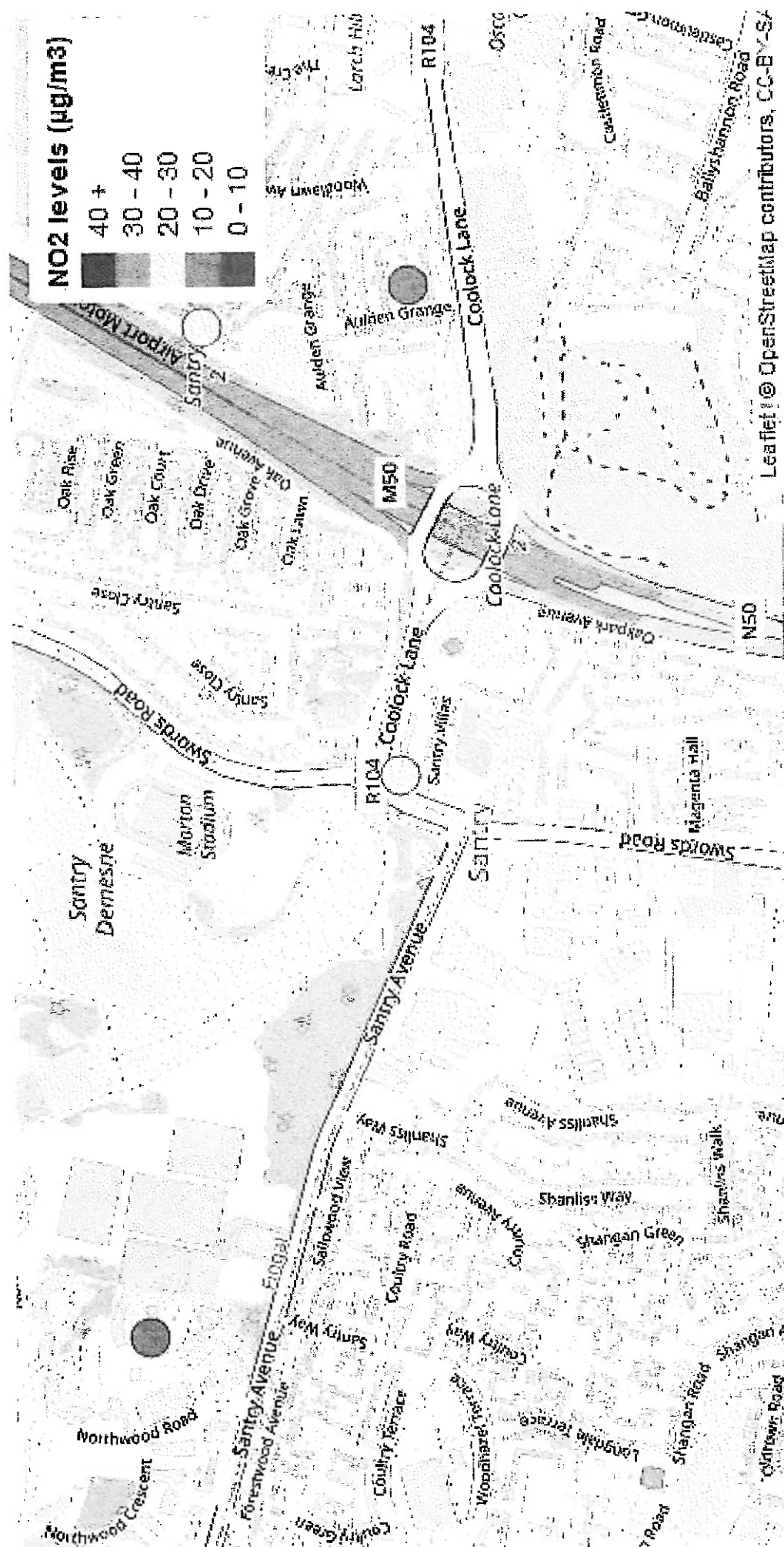
I have lived here for almost forty years and would never have envisaged the beautiful little village being destroyed the way it has. I cannot afford to move out and also don't feel like I should have to. I have worked hard and paid taxes all my life and quite frankly could do without all this.

Just to reiterate I have no objection to building houses for people but am totally opposed to this monstrosities

Yours sincerely

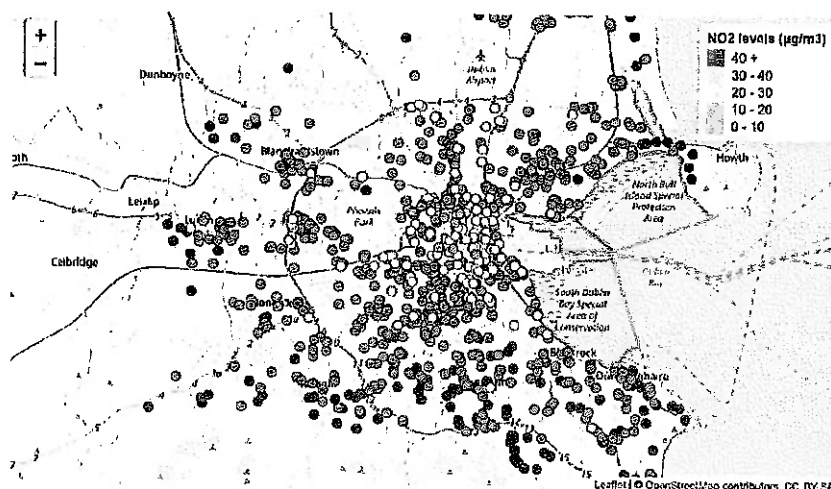
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Dolores Hanlon

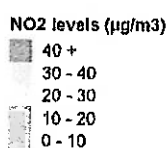




## Understanding Your Results



Your result is an indication of the level of NO<sub>2</sub> measured at your property over a 4-week period in October/November 2021. NO<sub>2</sub> levels can vary considerably over the year with changing traffic volumes and weather conditions. Therefore, it is best to view your results as a "snapshot", representative of the NO<sub>2</sub> levels near your property during that month and not a definitive measurement of NO<sub>2</sub>.



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.

Let's remember that **the lower the level of NO<sub>2</sub>, the better for everyone's health.** Fortunately, there are **many ongoing initiatives** in place to improve air quality in Dublin and there are actions you can take to help too!

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

The four Dublin Local Authorities, the EPA, and the government have adopted several policy measures including the Climate Action Plan (2021), Dublin's Air Quality Action Plan (2022), and the New National Investment Framework for Transport in Ireland (2021) which all comprise actions that will help reduce levels of NO<sub>2</sub> across the country.

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:

- 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.

Objection to: Plan No

314019 SHD

Herton / Buckley Site

STEPHANIE ANDREWS  
1 OAK PARK GROVE  
SANTRY  
D9

PAUL DOYLE  
8 OAK PARK GROVE  
SANTRY, D9

Andrea Smith 7 OAK PARK GROVE

Teresa Taylor 4 OAK PARK GROVE

Trishia Penrose 1 OAK PARK DRIVE  
Caroline Dotts 6 Oak Park Drive, D9.

Opama Carr 7a Oakpark Drive.

Maria Hickey 10 OAK PARK

Nicole Keane (Dodd) 11 OAK PARK DRIVE

Miriam Keane 11 OAK PARK AV.

JOHN FITZPATRICK

Suzanne McLaughlin 43 Oak Park Ave

Sean O'Reilly 45 Oak Park Ave

George McAllister 51 OAK PARK AVE SANTRY

Colleen Burke 54 Oakpark Ave Santry

Laura Degan 56 Oakpark Ave Santry

Bridget Cluskey 34 Oak Park Ave

Jan Cluskey 34 Oak Park Ave

David Cluskey 34 Oak Park Ave

Dan Cluskey 34 Oak Park Ave

Lee Cluskey 34 Oak Park Ave

Chris Durrant

2 Oak Park Grove

Marie Bonner 29 Oak Ave

ANN Lynch. 3 Oak Park Drive Santary

Devinh Kegg 24 Oak Park Ave

George O'Brien 32 Oak Park Dr No

Enneen Brennan 31

Caroline Moran 20, Oak Park Drive 9

Theresa Fitzpatrick 21 Oak Park Drive Santary D 9

Paddy Smith 25 Oak Park Drive Santary D 9

Darrell J. Moley 26 Oak Park Drive Santary D 9

R. Monks 28 " " " " "

Dessie Knepper 11 " " "

Benny Hylton 29 Oak Park Drive Santary D 9

Lili Lili 33 Oak Park Drive Santary D 9

Bernie Thompson 35 OAK PARK DR

Martina Ashmore 52 Oak Park Ave

Nick Gong 33 Oak Park Ave Santary D 9

Brenda Dawson 26 Oak Park Avenue Santary

Marvin Flynn 23 Oak Park Ave Santary

Mark Duignan 18 Oak Park Ave Santary

Margaret Preston 18 Oak Park Ave Santary

Rose Duignan 21 Santary Villages Santary D 9

Therese Nymme 19 Oak Park Santary D 9

Rebecca Kelly 16A Oak Park Santary D 9

Paul Kelly 16A OAK PARK AVE

Barbara Lee 9 " "

DJ	Dara	Gryl	30	OAK PARK AVE
Christine	Frage			SANTRY D.9
tharon	goeman		21	OAK PARK AVE
Stephanie	Kewmanagh		6	"Santry"
MARION	Kelly		16	OAKPARK AVE SANTRY
LINDA	HAMILTON		15	OAKPARK AVE SANTRY
FLOREEN	MAC GONNAN		14	OAKPARK AVE SANTRY
Dani	Kinsella		6	" " " "
Katie	Curran		9	" " " "

20 Oakpark Ave

Santry,

Dublin 9

3.8.22

**Ref; 314019 Heiton/Buckley Site Santry**

To whom it may concern;

I wish to strongly object to the above mentioned proposed development. To this end I enclose the required fee of €20.

The reasons for this objection are many, but to name what I feel are most important.

To date, this area has already been extremely over developed with and in fact if all the proposals were to go forward, we would have a population on par with Co. Kilkenny. To date, so many older people have had to move out of the area because they felt completely overwhelmed with the impact the apartment blocks have made. Some of these people were actually born and raised here in Santry

This area has not, structurally changed since the days of horse and cart. They are still the original roadways.

The infrastructure has not grown in line with the developments to include, schools, crèches, and medical facilities. I personally, have been unable to secure an immediate GP visit while being extremely sick, sometimes having to wait for over a week for an appointment.

Visually, fourteen stories in this village will seem incongruous, not to mention depressing, as it will fail to integrate or enhance the character of the surrounding area

I believe the building of these multi storey apartments, contravene current climate change agendas, as most new apartments have no alternative but to use dryers, although given the energy prices, people will also dry clothes on radiators, which in turn lead to health problems.

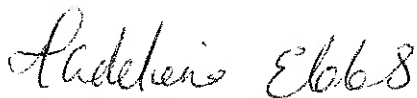
it is well documented that this type of high rise buildings are not fit for proper quality of life, as was proven during the 'Ballymun Towers' era.

I cannot stress enough how strongly I feel about this objection and hope you can honestly give this the attention it merits.

I have lived here for almost forty years and would never have envisaged the beautiful little village being destroyed the way it has. I cannot afford to move out and also don't feel like I should have to. I have worked hard and paid taxes all my life and quite frankly could do without all this.

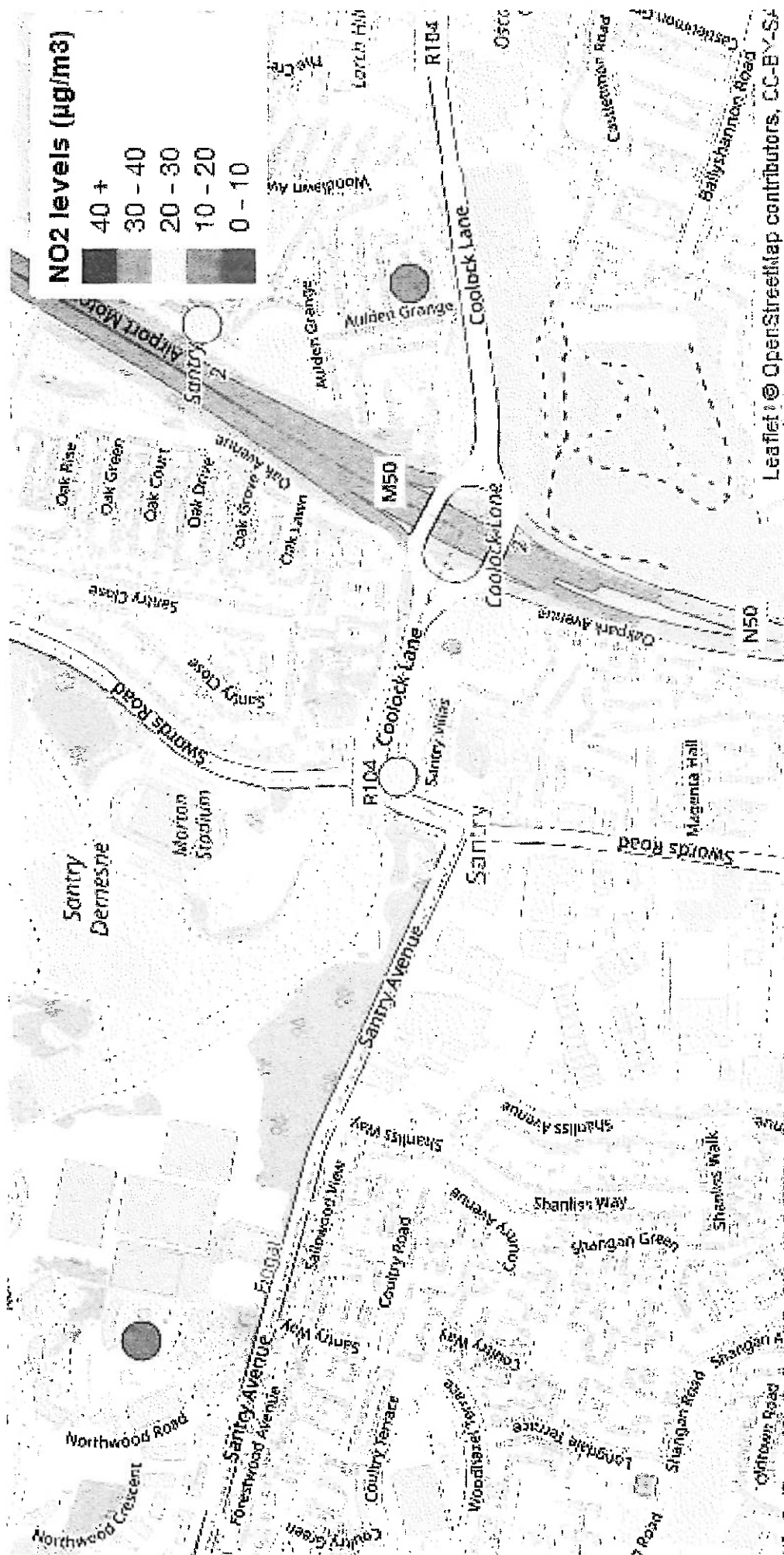
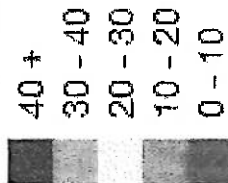
Just to reiterate I have no objection to building houses for people but am totally opposed to this monstrosities

Yours sincerely

A handwritten signature in cursive script that reads "Madeleine Ebbs".

Madeleine Ebbs

# NO2 levels (µg/m3)



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

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

Map labels: Dunboyne, Blanchardstown, Rathfriland, Coleridge, Fench, North End Urban Renewal Protection Area, South Dublin Local Authority Area of Environmental Control, River Liffey, Dublin Airport.

<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.



Objection to: Plan No

314019 SHD

Heaton / Buckley Site

STEPHANIE ANDREWS  
1 OAK PARK GROVE  
SANTRY  
D9

PAUL DOYLE  
8 OAK PARK GROVE

SANTRY, D9

ALLIAN SMITH 7 OAK PARK GROVE

TERESA TAYLOR 4 OAK PARK GROVE

TRISHIA PENROSE 1 OAK PARK DRIVE  
CAROLINE DUFF 6 OAK PARK DRIVE, D. 9.

OPUNIA CORR 7a Oakpark Drive.

MARIE HICKY 10 OAK PARK

NICOLA KEANE (Hood) 11 OAK PARK DRIVE

MIRIAM KEANE 11 OAK PARK AV.

JOHN FITZPATRICK

SUZANNE M'CHUGH 43 OAK PARK AVE

SEAN O'KEILLY 45 OAK PARK AVE

GEORGE M'ALLISTER 51 OAK PARK AVE SANTRY

COLLEEN BURKE 54 OAK PARK AVE SANTRY

Laura Degan 56 Oakpark Ave Santry

Bridget Cluskey 34 Oak Park Ave

IAN Cluskey 34 Oak Park Ave

DAVID Cluskey 34 Oak Park Ave

DAN Cluskey 34 Oak Park Ave

LEE Cluskey 34 Oak Park Ave

Chris Durrant

2 Oak Park Grove.

Marie Bonner, 29 Oak Ave.

ANN Lynch. 3 Oak Park Drive Santy

Dennis Kessell Oak Park Ave

George O'BRIEN 32 OAK PARK DR 10

Enneen Brennan 31

Carlisle Mann 20, Oak Park Ave 9

Theresa Fitzpatrick 21 Oak Park Ave Santy D9

Paddy Smith 25 OAK PARK Drive Santy D9

Dorothy J. Meller 26 Oak Park Drive Santy D9

K. Monks 28 " " " " "

Dessie K. K. 11 " " "

Betty Hylton 29 Oak Park Drive Santy D9

Lili Liu 33 Oak Park Drive Santy D9

Bernie Thompson 35 OAK PARK DR

Martina Ashmore 52 Oak Park Ave

Nick Gong 33 Oak Park Ave Santy D9

Renda Dawson 26 OAK PARK Avenue Santy

Marvin Flynn 23 OAK PARK Ave Santy

Mark Duignan 18 OAK PARK Ave Santy

Margaret Presan 18 Oak Park Ave Santy

Rose Duignan 21 Santy Villa Santy D9.

Therese Lynne 19 Oak Park Santy D9.

Rebecca Kelly 16a Oak Park Santy D9.

Paul Kelly 16a OAK PARK AVE

Barbara Lee 9 " "

DJ	Darren	Gryx	30	OAK BRK AVE
Christine	Jrge			SANTRY D.9
tharon	gorman		21	OAK PARK AVE
Stephanie	Kewenagh		6	"Santry"
Horion	Kelly		16	OAKPARK AVE SANTRY
LINDA	HAMILTON		15	OAKPARK AVE SANTRY
FLOREEN	MAC GUNNAN		14	OAKPARK AVE SANTRY
Daryl	Kinsella		6	" " " "
Kate			9	" " " "