

Submission to the ABP

Aug 2022	
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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 —————