



ROISIN SHORTALL T.D.

9th August 2021

314019: At the junction of Santry Avenue & Swords Road, Santry, Dublin 9
Case type: Strategic Housing Development – Application

In relation to the above Strategic Housing Development, I wish to set out the following concerns:

- This is the second SHD application for this site. The Board's previous decision to refuse permission for application 310910 was made in respect of one aspect of the planning documents, however, I believe more thorough consideration is required in respect of this new application. It is my view that the Board failed to acknowledge that the height and scale of the previous proposal would have been excessive, and the unit mix unsuitable for the needs of the local area. Those same concerns apply in respect of this new SHD application.
- The newest iteration of this application, which is essentially the exact same as the previous proposal, is for 350 units. Of that total figure, a mere 6% would be three-bed units, while 32% would be one-beds. The City Development Plan requires that a minimum of 15% must be allocated to three- or more bed units. Therefore, this proposal contravenes the Development Plan and continues a trend towards prioritising small units on cramped sites in outer city sites. While I accept that the Design Standards for New Apartments 2018 allows for this type of development, strict adherence to these guidelines will not create sustainable mixed communities.
- Analysis undertaken by KPMG for the draft Dublin City Development Plan 2022-2028 showed that there was an "increased demand for two and three person households and declining demand regarding single person households and one bed units". This data should inform the Board's decision, not regressive apartment standards.
- While I accept that there is a demand for single occupancy units on the City Council's housing list, in my view local authorities should not be relying on the private sector to meet this need. I fear that if this application is approved, many of these units will lie idle and the City Council will enter long-term leasing deals in order to use up the empty stock, thereby subsidising private developers and paying a high price for social housing stock with no asset at the end of the lease.
- In relation to social housing, I am very concerned that all 35 Part V apartments would be located in one block. These residents will likely be the only permanent tenants in what is set to be a complex populated by transient occupants. Part V units should be dispersed throughout the proposed development and not siloed in one block on this site. This is certainly not best practise and good social mix throughout the development should be encouraged.
- In respect of height, across the proposed development blocks would range from 7 to 14 storeys. 14 storeys is completely out of sync with the traditionally low rise

character of the area and unsuitable for Santry. The Development Plan allows for a maximum of 16 metres high in outer city areas and a development in line with this provision would still provide housing on this brownfield site but without dominating the local skyline. Following the Boards decision to grant planning permission for the Omni SHD, reference number 307011, it now appears to be open season for tall buildings across Santry but the long-term effects of this must be considered.

Expensive high-rise apartment blocks which yield small units, particularly in the absence of proper infrastructure and amenities, will not meet local housing need or the needs of families.

- In a recent High Court ruling on the former Premier Dairies site SHD, reference number 305312, the court rejected the Board's decision to grant permission in view of the application materially contravening the Development Plan without satisfying certain requirements, such as the public transport criteria. The precedent set by the High Court applies to this application as it also contravenes the Development Plan in respect of height. Therefore, it is my view that this application should be rejected. This significant decision by the court upholds the primacy of development plans, which are adopted democratically by local authorities after a long process of public consultation.
- The requirement to justify a breach of building height caps set by the Development Plan, as per SPPR3 (A) of Urban Development and Building Height Guidelines for Planning Authorities (2018), has not been satisfied in my view. If SPPR3 of Building Height Guidelines is to apply to this application, then the site must be "well served by public transport with high capacity, frequent service and good links to other modes of public transport." According to the applicants Material Contravention Statement, the site is "well served by both existing and proposed public transport routes." However, it should be noted that plans for future public transport infrastructure do not satisfy SPPR3 criteria. The public transport development management criteria in the Building Height Guidelines is expressed in the present tense, clearly requiring that the site should be currently well served by modes of public transport.
- While Santry has a number of bus services, local residents are entirely dependant on this one mode of public transport. There is no Luas or Dart in the vicinity and existing local bus services have serious capacity issues during peak times and Swords Road experiences major traffic congestion.
- Another issue which must be considered is the provision of school places and health services in the local area. The Department of Education has already raised concern over the adequacy of school facilities in Santry. At present, the area simply cannot cater to a large increase in residents needing school places and this must be addressed first. While there are plans to increase school places locally, there proposals are in their infancy. In respect of health, the availability of GP services locally is not adequate to meet the needs of future residents.

In light of the above points, I strongly object to this Strategic Housing Development.

Kind regards,

Róisín Shortall TD