

27<sup>th</sup> September, 2022

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

**Re: Planning application - apartment complex at Swords Road, Santry, Dublin 9.**

**Ref No. 314458 – Observations.**

The application for planning regarding the proposed apartment complex at the north-west corner of the Omni Park Shopping Centre and Santry Hall Industrial Estate should be rejected because:

- The local built environment has been hugely impacted by the recent development of high-density housing blocks; 120 x apartments at Swiss Cottage site, 200 apartments at Santry Place, 324 apartments at Omni Living plus the Heiton Buckley site (Swords Road /Santry Avenue junction) proposed development of 350 apartments. This totals 994 new apartments in strip development of approx. 500m stretching from the Heiton Buckley site to Omni Centre with no associated infra-structural or amenity developments.
- On-going development of 3 to 7 storey blocks of apartments and student residences on Shanowen Road has further impacted on local infrastructure.
- All of these developments in a small area are changing the dynamic of the community without a plan, accountability or democratic local stakeholder input. In the absence of a Local Area Plan, strip development has been permitted without any feasibility study regarding the long-term environmental, social and economic impact for the community.
- The additional public transport requirements for population growth in Santry cannot be met by the current services. There is no link to Dart or Luas services. Census 2016 identified that public transport was unable to sustain the then local population at peak times.
- There are regular, severe traffic delays throughout the day on the roads leading to /from Omni Park Shopping Centre and Swords Road. Congestion on Swords Road extending to Shanowen Road and /or Shanliss Road and Coolock Lane from traffic queuing for Omni Park Shopping Centre has been further exacerbated by traffic from new developments at Santry Place, Swiss Cottage and Shanowen Road sites.
- The development of high-density sites in the area in recent years has led to over-population without additional infra-structure and resources:

- There are no primary or second level schools in Santry. Residents are served by schools in the neighbouring Larkhill, Whitehall and Beaumont suburbs. The Department of Education and Skills has expressed serious concerns re meeting future education needs for the area.
  - Travel to schools outside the area impacts on numbers travelling by over-subscribed public transport to schools not within walking distance.
  - There is no Public Health Centre in Santry. Local medical surgeries are over-subscribed and impacted upon by the aging population residing in the community.
  - There is no Public Library in Santry.
  - There are no community youth facilities in Santry.
  - Residents are fortunate to have Northwood Demense managed by Fingal County Council for recreational purposes. However, recent building developments at the Gulliver's Retail end of Northwood has impacted on the park and current facilities such as car-parking and public toilets are inadequate to support residents of further proposed large scale developments.
- Santry is not listed in the current Draft Dublin City Plan 2022-2028 for proposed Local Environmental Plans despite its proximity to the Port Tunnel. Environmental pollution is already impacted by recent developments in the area. This will be further exacerbated by the impact of the proposed Oscar Traynor SDRA at Oscar Traynor Road and the M1 interchange.
  - The development of high-density housing during the 1960s /70s in the neighbouring community of Ballymun was an environmental, social and economic disaster for the north Dublin city area due to the lack of infra-structural supports and amenities being in place in advance of the housing development. Costly lessons should be learned!
  - The Draft Dublin City Development Plan 2022-2028 (chapter 15) recommends that build to rent developments should be confined to inside Dublin city canals, within 500m of significant employment and transport hubs. Santry does not meet these criteria.
  - We support the delivery of sustainable residential development for our community. There was large scale development in the Santry area during the late 1950s through to the mid-1960s resulting in a current sizeable cohort of aging residents in the community, including we, who, if suitable and affordable mixed housing developments were available in the area, could consider downsizing to free up 3 and 4 bed houses to facilitate younger /larger families.
  - Build to rent developments will not sustain a flourishing, resilient and vibrant mixed-dwelling community for current and future Santry residents. That principle can only be achieved if innovative, coherent, democratic and thoughtful planning is advanced in the form of a Local Area Plan with a stay on further building development in the area until the LAP is in place.
  - Application ref. no. 314458 does not contribute to or enhance long-term planning for the Santry area and should be rejected by An Bord Pleanála.

Barry & Christine Carroll  
 31 Shanliss Way  
 Santry

## Dublin 9

- The development of a sustainable and resilient community to support current and future residents of the Santry area can only be achieved via stakeholder consultation followed by the publication of a Local Area Plan (LAP) for Santry. Santry is not listed for priority LAP in the timeframe of the proposed Draft Plan.