

73 Swords Road

Whitehall

Dublin 9

27.09.2022

Re: SHD0019/22 Nth West Corner of Omni Park SC and Santry Hall Industrial Estate

I wish to make the following observations on the above proposed development:

Traffic & Transport

Currently there are traffic congestion issues along Swords Road and particularly in the vicinity of the entrance to Omni Park Shopping Centre / traffic light junction with Lorcan Road. The addition of 457 apartments at this site, with access and egress along the same access road, will add to the traffic congestion. While only 213 car parking spaces are provided for the development, there is no doubt that future residents, who do not purchase/are provided with a car space will use existing parking around the shopping centre or along the adjacent residential roads, in particular, Lorcan Road, Lorcan Drive, Shanrath Road and Shanvarna Road. Residents on Lorcan Road/Shanrath Road have long complained of rat-running by traffic coming from Swords Road northwards, and across the flyover bridge (R132), through their roads in order to avoid the static traffic, on Swords Road, from the flyover up to the entrance to Omni Park S.C. This rat-running will increase exponentially with this development, whether it is by traffic accessing the apartments or those residents who are car owners but have no option but to park in this area and walk across Swords Rd to access this development. The reduction of 104 existing public parking spaces will only add to the parking issues that will ensue for residents of these roads.

The ABP opinion notes that a Traffic and Transport Assessment should be prepared and I concur that this should address the issue of current and future traffic congestion at this junction, particularly in respect of Bus Connects on Swords Road, possible realignment of the junction and a possible other entrance /exit to this site and/or Omni Park Shopping Centre. The provision of only 22 EV charging points is in breach of the draft Development Plan.

Overshadowing

At the presentation given to DCC councillors, it was confirmed that the separation distances from Blocks A & B from the garden walls of houses on Shanliss Ave were between 4m– 6m where the regulations stipulate that this distance should be between 9-10m this is unacceptable and presents a clear case of overshadowing. A distance of 22m is required between opposing first floor windows of apartment blocks, it is noted that the shortest point between above in this development is 18.09m.

Height

The heights request in this application is justified, in part, from nearby developments that have been granted permission and/or built in the past couple of years. Granting of permission for this

development should not automatically follow because precedent exists. I would argue that the opposite is the case – such has been the intense development of similar height apartment blocks in the immediate vicinity (both sides of Swords Road between this site and Santry Ave) that a case can be made for lower heights and density level at this site.

Density & Plot Ratio

This area is zoned Z4 – District Centre, and it has been identified as a Key Urban Village, in the draft Development Plan. The proposed density for this site is just about double what is allowed in a KUV – 60-150 units per ha. Proposed density 295 units per ha. This is just unacceptable. The developer cites other examples in the Santry area of higher density (than is permitted under the Dev Plan) This is the issue that has been highlighted by Santry residents when making observations on SHD applications in the Santry area over the past few years. Each application is considered on its own merits. The stretch of roadway between this site and Santry Avenue, a distance of possible 500m, has had several SHD developments with upwards of 1000 new apartments provided without any corresponding increase, or indeed, audit of community requirements, school places, and top of the list, a traffic plan. Citing previous permissions granted in the immediate vicinity of this site should not provide a reason for granting approval, rather should be quite the opposite and give pause for thought – have we had enough development in this suburban area that has contravened the development plan guidelines on density. And because it has been granted before is this a carte blanche for granting permission to another development which is clearly at odds with the Development Plan and an overall strategic plan of how much development is too much?

Zoning

As stated the current zoning is Z4 which provides for mixed service facilities of a village centre / commercial district whereas this application is 99% residential. There are other Material Contraventions of the Development Plan but this one is key: can an area designated as a KUV to service the surrounding area plus developments with permissions granted not yet built, be changed to a residential development with consequent loss of provided commercial parking and increased congestion?

Patricia Roe
Councillor Artane-Whitehall