

Cllr Alison Gilliland
37 Maryfield Drive,
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29 Sept 2022

Submission on ABP Reference: TA29N.314458 on site at North West Corner of the Omni Shopping Centre, Santry and Santry Hall Industrial Estate, Swords Road.

Proposal: The demolition of existing buildings (including 2 no. ESB sub stations) and the construction of a mixed use residential (457 apartments) and commercial development ranging in height from 4 to 12 storeys over basement in four blocks, with internal residential amenity space, childcare facility, community building and two retail/café/restaurant units.

Website: www.omniplazashd.ie

A chara,

I have very serious reservations about this particular proposal both in terms of its conforming with the site zoning, the material contraventions to our almost signed off on Development Plan, the impact on the local community and in terms of the quality of life of any future resident should this proposal be realised. I summarise my concerns below:

- **The proposal does not conform to the Z4 zoning** 'to provide for and improve mixed services facilities' - this is predominantly a residential proposal and the services integrated in to it area designed to serve the large future residential community so contributes nothing to improve the services and amenities in the area. Under the 15 minute concept that will permeate the new Dublin Development Plan 2022 - 2028, additional services and facilities will be required in Santry to realise this ambition, therefore the Z4 zoning use needs to be protected to deliver much needed services.
- **Local impact 1: The proposal will have a detrimental impact on the quality of life of the local residents along Shanliss Avenue**, particularly odd Nos 51 - 89/91 from a significant overlook and significant loss of privacy and use of their enjoyment of their back gardens - it is most notable and indeed disingenuous that the CGI of the development from the perspective of Shanliss Ave is from quite a distance and there is no image of the development from the perspective of the homes closest to the development ie odd Nos 51 - 89/91
- **Local impact 2: The local community cannot provide sufficient services to support the additional local residents** - while the Local Community Audit argues sufficient services, taken in a broader context of numerous current applications for housing units the

local area cannot cumulatively provide for all, particularly when there are no plans for additional schools or community health facilities

- **The proposed residential development is not conducive to a good quality of life for future residents:** it is set in a backland area that is predominantly a very busy carpark and retail area to the south and east and overlooks an industrial area to the north. Access compromises future residents safety particularly those who cycle. There is no street or green area frontage. there is no segregation between the public plaza open space and the communal/residential areas which raises child safety issues and the inability of parents to safely allow their children out to play independently.
- **The proposed development materially contravenes upcoming Dublin Development Plan 2022 - 2028** with regard to density, plot ratio and site coverage, provision of cultural/ community space, unit size, layout and universal design, the provision of EV charging points and separation distances as follows:

1. **Density:** The site is within the proposed 'Key Urban Village' as per the draft Development Plan with permitted densities are between 60 -150 units per ha. The proposed density of this development is stated as 295 units per ha. While the applicant has submitted a justification in the context of the NPF 2040, and included examples in the local area of higher density developments permitted, I would argue that this justification is not valid given the lack of social and community amenities and services, underdeveloped active travel infrastructure required for access to the site and the overall demands of residential developments in the last 5 years that have cumulatively significantly increased the local KUV density average.

2. **Plot Ration and site coverage** – the draft plan specifies an indicative plot ratio of 1.0- 2.0 for outer employment and residential areas, and a site coverage of 45% -60%. The applicant has noted the development has a plot ration of 2.6 and site coverage of 28% respectively. While the applicant has submitted a justification that the site is capable of higher plot ration due to the QBC and as above has also included examples in the local area of higher density developments permitted, I would argue that the future QBC and infra-strucrture cite that will be build over the next 10 years is not sufficient justification particularly given that this QBC only dominated by one single xis ie Swords to City Centre

3. **Cultural and Community Floor Space** –the new Development Plan cites a requirement for *'all new regeneration areas (SDRA's) and large scale developments above 10000sqm in total area must provide 5% community, arts and cultural and artist workspaces internal floor space as part of their development'*. This application does not provide 5% community/arts/cultural space – the applicant notes the amenity spaces provided for **residential amenity**, community, crèche and retail units. There is no evidence to support how the community amenity will be made available to the wider community if at all. There is one small community centre within 10 minutes walking

distance of this development but it does not meet the requirements of current local residents.

4. **Contravention of objective QHSN010** - The application does not meet the requirement '*to ensure 50% of apartments in any development are required to be in excess of minimum sizes - designed to be suitable for older people / mobility impaired people*'. The development is stated to fully accord with the requirements of at least 10% greater than the minimum size, all units are noted to comply with Part M of the Building Regs & Apartment Guidelines 2020. The upcoming Development Plan goes beyond these basic requirements recognising that our older citizens are increasing in number and in more advanced years. We are therefore pre-empting equality of access to appropriate accommodation.

5. **EV charging** – to support the realisation of the national Climate Action Plan 2021 with regard to a transition to electric vehicles, the Draft Plan requires 50% of all car parking spaces to be equipped with fully functioning EV charging points. The proposed development proposes 22 no. EV charging spaces (10.3%).

6. **Separation distances** – The Draft Plan requires 22m distance between opposing first floor windows. The proposed development has a 18.09m separation between blocks at the narrowest point. While the applicant notes that mitigation measures have been included in the design where this occurs taken the scale and height of Blocks A & B and their over shadowing impact and their over looking down in to the private back gardens of those residential dwellings along Shanliss Avenue, a 22m separation should be the bare minimum standard upheld.

Given these significant impacts and contraventions I would propose that the application in its current form be declined and that a recommendation to develop the site in such a way that adheres to the Z4 zoning of the site and responds to the actual service and amenity needs of the community.

Kind Regards,

Alison

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