

Observations and submission on a proposed Strategic Housing Development (SHD) planning application.

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SHD Reg. Ref: SHD0019/22

ABP Reference: TA29N.314458

Applicant: Serendale Limited

Location: Site at North West Corner of the Omni Shopping Centre, Santry and Santry Hall Industrial Estate, Swords Road, Santry.

The proposed development is located in KUV 11. KUVs are not considered in the 2016 Development plan but are treated in some depth in the 2022 – 28 Plan. KUV principles as set out in Chapter 14 include:

- 1. Mixed Use: Promote an increased density of mixed-use development including residential development with diversity in unit types and tenures capable of establishing long-term integrated communities.***

The majority of units (221 no. 1-bed apartments) do not contribute to the establishment of a long-term integrated community and it is doubtful whether 2-beds do either. The former points to a predominantly transient community that will not integrate as the development is shoe-horned into the corner of what will remain a car park almost enclosed in a horse shoe by a large shopping centre whose only outlet is a busy road that is destined to get busier.

The “Plaza” elements are miniscule in relation to the development itself and while good for PR, provide open ready access to the residential blocks, thus compromising the security of residents. Integration with current residents is hardly possible when the majority arrive by car and are unlikely to walk to the “Plaza” to mingle with residents of the development.

The smaller “Plaza” exits onto Swords Rd., which currently is a congested road with no incentive to walk unless absolutely necessary and, other than the Comet pub, no social facilities that might assist in community integration.

The proposed development continues a trend in the area to build 1-bed apartments and developing social problems are leading to a flight of long-term residents – particularly from the Shanliss area, where ‘for sale’ signs currently proliferate.

The developer proposes a creche and two retail units of an indeterminate nature - they might be retail but are not specified as social facilities, i.e. restaurants, which are only suggested. It is hard to envisage how residents in the new development might develop an integrated community within themselves in these circumstances much less with the greater Santry community. I submit that this is not a mixed – use development with a diversity of unit types.

At 16.10.1 of the current City development plan, under Mix of Residential Units it states:

Each apartment development shall contain:

- A maximum of 25-30% one-bedroom units
- A minimum of 15% three- or more bedroom units

It is clear that this criterion is not met in this development and that as a result it does not accord with KUV principles or with the existing development plan. I contend that on these grounds alone, the application should be rejected.

2. Density: Ensure the establishment of higher density development capable of sustaining quality public transport systems and supporting local services and activities. Encourage the development/re-development of under-utilised sites and intensification of underutilised areas such as surface parking. Opportunity should be taken to use the levels above ground level for additional commercial/retail/services or residential use.

Unfortunately, there is not a quality public transport service in Santry and a number of High Court cases have been specific in stating that they must be in place prior to the development commencing. The latest decision being re. Shannon Homes in Ballyboden where the judge found that the board had failed to take public transport capacity for the area properly into account when arriving at its decision to give the proposed development the go-ahead. This would require a public transport audit to be carried out by the developer.

“Urban Development and Building Height Guidelines 2018”, enables increased building height and residential densities on sites adjacent to quality public transport routes and within existing urban areas. It is not possible at this point to determine whether Bus Connects will successfully run in the area. Metro North fell through over a decade ago after a lot of preparatory ground works had been completed. For this justification to be used, the Bus Connects would have to be operating successfully.

Neither is Santry close to a transport hub. If Metro North should eventually be built, the nearest station would be over 1.5km away.

If it does operate efficiently, then there will be increased uptake and as all buses serving Swords Rd in the vicinity of the development originate in towns in Fingal, they would be full – as they are at the moment, during rush - hour on reaching Santry –and would suffer delays on this stretch of road. I submit that the consideration of permission be postponed pending the initiation of Bus Connects, as a major justification for the development is the presence of a quality public transport route.

The site is 2.5ha in size according to the site notice. At 183 Units per hectare for the site (which includes the two Plazas and surface parking) it compares unfavourably with the nearby Swiss cottage development at 85.3 units

I understood that developments in excess of 2ha should be accompanied by appropriate master planning exercises and local planning frameworks to deal with movement,

public realm, design and other issues but find nothing in relation to this site that suggests that these have been undertaken.

- 3 *Transport: Ensure provision is made for quality public transport systems. Provide improved access to these systems and incorporate travel plans, which prioritise the primacy of pedestrian and cyclist movement and address the issue of parking facilities and parking overflow. Ensure that enhanced connectivity and permeability is promoted.***

Material Alteration Reference Number 8.16 of the development plan 2022-28 states that: **Permission for major development (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken. There would appear to be still the possibility of a walking – cycle route linking Santry Demesne Park, DCU and Albert College Park. This is not considered in the audit and the possibility will be lost if the development does not include provision for the establishment of the route.**

- 4. *Employment: Encourage the provision of employment uses incorporating office, work hub, live-work units, professional and financial services and the creation of small start-up units.***

No element of this criterion is satisfied by the proposed development, which is situated in a KUV which satisfies mainly only two criteria: a few office units and a medical unit. The proposed development does not add to the pool of employment uses or to their diversity and therefore does not satisfy this criterion. SPPR2 is specific in this regard. The lack of employment opportunities associated with recent developments in Santry is contrary to the spirit of and detrimental to the plan for a 15 minute city. This Z4 site is, in fact being developed as a Z1 and I submit that the application be refused on this ground.

At the scale of district/ neighbourhood/ street: The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape. (National Planning Guidelines 3.2)

The height, dominance of plane surfaces and monolithic form of the buildings overlooking – particularly Shanliss Rd – two storey houses and gardens makes a negative contribution. The photos provided by the developer of views from various streets are disingenuous in that they skilfully use street-side trees to mask the massing of the buildings and entirely neglects to show the overlooking of portion of Shanliss Rd.

Santry is a low – rise area, so, where a site has a pre-existing height over 16m, a building of the same number of storeys may be permitted, subject to assessment against the standards set out elsewhere in the development plan. These are outlined in the assessment criteria. (P. 320. Dublin City Development Plan, 2016–2022: Written Statement). Among them is an ‘Evaluation of providing a similar level of density in an alternative urban form’. The developer has not provided such an assessment.

One of the laudable objectives of the Dublin City Development Plan 2016–2022: Written Statement QH3: (i) To secure the implementation of the Dublin City Council Housing Strategy in accordance with the provision of national legislation. In this regard, 10

percent of the land zoned for residential uses, or for a mixture of residential and other uses, shall be reserved for the provision of social and/or affordable housing in order to promote tenure diversity and a socially inclusive city. (Appendix 2A - P23) I can find no provision for social or affordable housing in this proposal and I submit that in this regard, it is in breach of the Development Plan.

Population growth rate in Santry as indicated by the 2016 Census is above the growth rate in the state but the figures do not reflect the current reality and it is reasonable to assume that the population has increased at the same or a greater rate during the period 2016 – 2022. That would place the current population at +17,000 within the area – almost double with no extra facilities provided. Current developments in train will add up to +7,000 – the proposed development adding a possible 1,500 at an average occupancy of 3 per unit.

Northwood or Santry Close/Royal Oak – both parts of Santry but in the Fingal area - with a significant population that uses the facilities and amenities in Santry, is outside the developer's survey area and current large-scale residential development merely adds to the pressure in the area through adding thousands of more residents.

It is disingenuous not to include these significant residential areas and new approved developments in Santry in the Community Audit as they also contribute to traffic congestion and pressure on the limited facilities available in Santry. Again, the concept of the 15 minute city promoted by the Council is not served if infrastructural development does not accompany individual developments but instead occurs piecemeal over an extended period – if at all.

I could not locate a City Council standard for EV charging points. However the provision of 22 EV charging points for 225 parking spaces in the basement with no obvious provision for an extension of that provision – knowing that CO2 emitting vehicles will be phased out over the next decade or so, is inadequate. It potentially represents less than 10% availability

The proposed development materially contravenes Dublin City Development Plan 2022 - 2028 with regard to:

Density: 15.5.5: 'New development should achieve a density that is appropriate to the site conditions and surrounding neighbourhood. The density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity.' The development will dwarf neighbouring houses and is totally out of character.

It is the policy of Dublin City Council as outlined in the Development Plan under:

12.5.1 CU4 Cultural Resources

'To support the development of new and expanded cultural resources and facilities within the city that enrich the lives of citizens and visitors, provide new opportunities for engagement and celebrate aspects of our history and culture.'

And

CU 12: Cultural Spaces and Facilities

‘To grow the range of cultural spaces and facilities in tandem with all new developments and across existing developments to meet the needs of an increased population within the city.’ AND Section 12.5.3 (CUO 22) of the 2016 Plan.

Only an internal communal residential amenity is proposed, which clearly indicates that there will be no public access.

For all of the above reasons, I submit that the application be rejected.