



ROISIN SHORTALL T.D.

314458: NW corner of Omni Park SC, Santry & Santry Hall Industrial Estate, Swords Rd, Dublin 9

Case type: Strategic Housing Development – Application

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

- Across the proposed development, apartment blocks would range from four to 12 storeys. That is a colossal height for a suburban area, and it would be in breach of the CDP if approved. The current CDP rightly recognised the “intrinsic quality of Dublin as a low-rise city” and set a building height cap of 16m, roughly five storeys, for developments in outer city locations. Although I accept that the *‘Urban Development and Building Height Guidelines for Planning Authorities’* (2018) allow for this scale of development, the Board should not view increased heights as the default objective.
- The long-term impacts of these ad hoc high-rise developments on Santry appears to be completely absent from the Board’s deliberations in respect of local SHD proposals. In the vicinity of this site, three other large-scale developments have been approved and a fourth is under consideration. If this latest proposal is approved, there will be at least over 1,100 new apartments in the small area that stretches from Omni Park Shopping Centre to Santry Avenue. When you look at what has been approved in the wider Santry/Whitehall area, that number more than doubles to over 2,300 apartments. If one were to include local sites earmarked for development and applications under consideration by the Board, Dublin City Council and Fingal City Council, the overall number of new apartments in the local area could be over 5,600. Given that so many of these apartments will be tiny “shoebox” units, completely unsuitable for the needs of families, and without the necessary investment in local infrastructure and amenities, one could only conclude that this level of development is completely unsustainable.
- Traffic congestion is a huge issue on the Swords Road, particularly at the Omni Park SC and Lorcan Road junction. Potentially adding 213 more cars, along with over 150 from the adjacent *‘Omni Living’* development, would seriously compound the existing tailbacks on Swords Road and congestion at the junction. The BusConnects project alone will not be enough to alleviate these concerns in view of the ever-increasing number of high-density developments along Swords Road.
- Also, there is some concern locally about the proposed reduction in car parking spaces in Omni Park SC. If this development is approved, 104 commercial car parking spaces will be lost, which is likely to have a major impact on local retailers and customers. As it stands, parking is at a premium in Omni Park SC, particularly at peak times. A further reduction in parking provision will only serve to exacerbate this issue.
- The proposed development would comprise of 457 apartments. Of this total figure, only 24 would be three-bed apartments. The remaining 433 would all be smaller units. Although this unit mix is permissible under SPPR1 and SPPR2 of *‘Sustainable Urban Housing: Design Standards for New Apartments’* (2020), issued under Section 28 of the Planning and Development Act 2000 (as amended), I do not believe it to be in line with good planning principles or sustainable development. Not only would this miniscule allocation of just 5%

three-bed units represent a material contravention of the Dublin City Development Plan (CDP), but it would also do little to address local housing need.

- While increased demand for one-bed units exists in some parts of the city, in my view there is no justification for approving a development in Santry where 48% of units would be one-beds. Demand for a large number of small units, priced way out of reach of ordinary workers, simply does not exist in suburban areas such as Santry. Inevitably this overconcentration of small units will be used for student accommodation and short-term lettings. Neither of these uses would help to foster a settled community, instead creating a transient population.
- The deficit in local infrastructure and amenities is an issue which urgently needs to be addressed before any further developments are approved. The Department of Education has already raised concerns regarding the inadequacy of school facilities in Santry. While there are plans to increase school places locally, these proposals are in their infancy. In respect of health, the availability of GP services locally is currently not adequate to meet the needs of future residents. These issues remain unresolved and will only be magnified by the scale of development occurring locally.
- It should also be noted that Santry is entirely dependent on bus services in the provision of public transport, with no rail or Luas services in the area. Planned public transport projects, such as BusConnects, are not sufficient grounds to grant permission, and they do not satisfy the requirements of SPPR3 (A) of the building height guidelines to justify a breach of building height caps set by the CDP. Developments of this size should only be approved in tandem with the necessary transport infrastructure in operation.

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

Kind regards,

Róisín Shortall TD

Dáil Éireann,

Leinster House,

Kildare Street,

Dublin 2