



ROISIN SHORTALL T.D.

30th July 2024

Bord Pleanála Case reference: LH29N.320106

Planning Authority Case Reference: LRD6044/24-S3A

Location: The junction of Santry Avenue and Swords Road, Santry, Dublin 9

To whom it may concern,

In relation to the above planning application, I wish to make the following points:

- While the applicant has marginally reduced the building height in this latest proposal, I would still argue that a building height of 13 storeys does not meet the key criteria of the Dublin City Development Plan 2022-2028 in respect of greater building heights.
- The criteria which must be satisfied to justify such heights includes proximity to high quality public transport connectivity, the provision of public amenities and an appropriate design response that considers the characteristics of the site and the prevailing local character.
- I believe these criteria have not been met. For example, in respect of public transport connectivity, the local area is entirely dependent on buses, and it is not in the vicinity of any key transport interchanges.
- Furthermore, in my view, the concerns expressed by the City Council in their LSRD pre-planning opinion in respect of bulk, massing, height, scale and layout have not been appropriately addressed by the applicant.
- I believe that the City Council's earlier assessment still applies to the revised design, i.e. that it constitutes a "blocky and inelegant corner proposal". It is disappointing that the City Council did not uphold this view in its final decision.
- The City Council also stated that the "opportunity to design this building from first principles, to an appropriate height, should not be ignored." In my opinion, a reduction of just one storey, from a maximum height of 14 to 13 storeys, represents an almost negligible revision given the scale.
- In relation to social housing, I am very concerned that all 32 Part V apartments would be located in one block. These residents will likely be the only permanent tenants in what is set to be a complex populated by transient occupants. Part V units should be dispersed throughout the proposed development and not siloed in one block on this site. The current proposal certainly does not represent best practise and good social mix throughout the development should be encouraged.
- Furthermore, if approved, a condition should be placed on this development which requires 50 per cent of the units, excluding the Part V allocation, to be put up for sale.
- Finally, it remains my firm belief that Santry needs a local area plan as there is a serious deficit of infrastructure and amenities locally. In the absence of a core strategy or vision, a number of large-scale developments have been granted planning permission in recent years, most of which have or will yield apartments that are priced out of reach of ordinary workers and local people.

I would urge the Board to give strong consideration to these matters.

Kind regards,

Róisín Shortall TD