To: Municipal Executive (Mayor and Aldermen) of the Municipality of Eindhoven
To: Foolen & Reijs Vastgoed

Subject: Paradise City II, Paradijslaan 20-24 - residents' response to the proposed development of the inner courtyard

Dear Members of the Municipal Executive, Dear Sir/Madam,

As immediate neighbours, we have become aware of the proposal to construct a new residential building with approximately 84 homes on the current car park behind Paradise City. The proposed new building in the inner courtyard will be higher than the existing building in front of it (25.8 versus 20.3 metres; 8 versus 6 storeys) and will result in a substantial deterioration of the residential and living environment for immediate neighbours.

Based on the information currently available, we cannot support the necessity or desirability of development at this location. In our view, it must be convincingly demonstrated that further densification at this particular location is spatially and socially acceptable. Eindhoven's housing challenge does not automatically mean that every available space in the existing city centre is suitable for housing development.

Value of the existing inner courtyard
The current car park forms a small open space within a densely built urban block. Even this limited openness is significant to immediate neighbours: it provides distance between buildings, light, air, privacy and tranquillity. Development would permanently alter this character and considerably intensify the use of the inner courtyard.

The municipal TIRA advice cites, among other arguments for development, that the rear site would have little added value for the city and that surface-level parking does not fit with current mobility ambitions. We consider this approach too limited.

Open inner courtyards in compact urban areas are important for spatial quality, climate adaptation, water retention and limiting heat stress. In the documents available to us, we do not see a clear assessment of these aspects or of the consequences that development would have for these functions.

It is striking that the same municipal advice states that the expected impact of the development is not very significant, "except for the immediate neighbours". For this group in particular, the impact is therefore acknowledged as relevant. Moreover, a substantial number of residents live directly around the inner courtyard. In our view, this observation cannot be dismissed as a limited exception; it requires a careful and full consideration of the interests of and consequences for all immediate neighbours.

Why this location in particular? From the documents, we understand that the need for housing and the possibility of adding homes relatively quickly on privately owned land are important arguments for this development. We understand the municipality's ambition to add housing within the existing urban area. A general need for housing, however, is not in itself a location-specific justification for why this particular inner courtyard, behind existing homes and in

the middle of an already intensively used inner-city environment, is suitable for further densification. We consider it important that the reasons why this specific location is deemed suitable for further densification are made clear, together with how the interests of the existing residential environment have been weighed in that assessment.

Cumulative pressure on the neighbourhood
Paradise City II does not stand alone. The municipality itself also identifies several developments that have recently taken place, are currently taking place or are already planned in the immediate vicinity (within a radius of 50 metres). Examples include Nieuw Bergen, Sebas on Grote Berg, the TD Building, the subdivision of properties into multiple dwellings on Don Boscostraat, and the conversion of Paradise City I from commercial premises to residential use.

Each of these developments has its own effects on the surrounding area, but together they lead to a further increase in the number of residents, traffic movements and use of public space. Parking pressure and building intensity also increase as a result. For residents, it is precisely this cumulative effect that matters, particularly in a neighbourhood where quality of life is already under pressure.

We therefore believe that Paradise City II cannot be assessed solely as an isolated development. We ask the municipality to identify which existing, permitted and proposed developments in the immediate area are relevant, how their combined effects on quality of life, traffic, parking pressure and public space are taken into account, and what criteria are used to determine whether the cumulative burden on the area remains acceptable.

Non-representative participation
We have concerns about the way participation has been organised to date. On the one hand, the participation plan states that the immediate neighbourhood may actively contribute ideas and that residents' interests will be taken into account. On the other hand, it explicitly states that important matters have already been fixed and are no longer open for discussion, including the building volume within the spatial planning framework.

As a result, participation appears to focus primarily on the further elaboration of a development for which the most important choices have already been made. Residents may, for example, still discuss the design of the green outdoor areas, the experience of the inner courtyard and the roof gardens, but no longer the fundamental question of whether development should take place here and, if so, on what scale.

We believe this leaves insufficient scope for an open assessment of the necessity, desirability and scale of the development. These aspects have major consequences for the immediate residential environment and should therefore form part of a genuine balancing of interests.

An initial participation meeting took place on 27 May, and we subsequently received the minutes. Although there are aspects of the record of our concerns and objections with which we do not fully identify, we did not respond to the minutes separately at the time. We waited for the continuation of the participation process and an announced follow-up, but a second participation meeting has not taken place to date. The absence of a response after the first meeting must therefore not be interpreted as agreement with the plan or as an absence of objections.

We also question to what extent earlier participation (which apparently took place without the knowledge of most local residents) provided a representative picture of the immediate neighbours. The participation plan (which we found among the documents disclosed under the Dutch Open Government Act, Woo) refers to a positive response from a "Luciferstraat resident". From the documents, we understand that this response came from one resident who had been approached separately earlier in the process. In our view, one such response cannot establish that it represents the views or interests of the immediate neighbours. We therefore ask for transparency about how many immediate neighbours have been reached to date, how many responses have been received and how differing views are reflected in the reporting and subsequent decision-making.

Next steps and further assessment
We assume that the interests of current residents will not be considered solely during the further elaboration of the plan, but will explicitly form part of the assessment of whether development at this location is spatially acceptable and, if so, under what conditions.

This letter is intended to set out our main objections and points of concern at this early stage. At this time, we have deliberately chosen not to address every substantive aspect of the proposed design in detail. This expressly does not mean that we agree with those aspects. We reserve the right to supplement our objections at a later stage and, if our concerns are not adequately addressed, to have these objections reviewed by the administrative court.

We request that you add this letter to the participation and project file and send us written confirmation that this has been done. We would also appreciate a substantive response to the points and questions raised in this letter.

Yours faithfully,

Name:
Address:
Email address:
Date:
Signature: