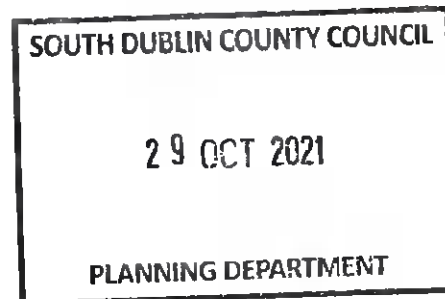


10 Oak Court Grove,
Palmerstown
D20 E791

South Dublin County Council
County Hall
Tallaght
Dublin 24
D24 A3XC

27th October 2021



Attention of The Planning Department

Reference: SD21A/0271

Description: Demolition of the existing building on site and the construction of a 5-storey over partial basement, mixed-use development comprising a gastro pub/restaurant with off-licence, 2 retail units, associated bin stores, bike stores, 1 ESB sub-station, all at ground floor level; a small plant room at basement level; a total of 50 apartments (25 one beds and 25 two beds) on the upper floors, all provided with private balconies/terraces; communal roof gardens; car parking; motorcycle parking; bicycle parking; landscaping and upgrades to public realm including upgrades to existing pedestrian crossing on Kennelsfort Road Upper, and all associated engineering and site works necessary to facilitate the development on lands at The Silver Granite pub, junction of Kennelsfort Road Upper and Wheatfield Road, and at The Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park)

Applicant: Hollyville Investments Ltd.

Dear Sir / Madam

I wish to lodge an objection to the proposed development at the 'Silver Granite' site as described above at Palmerstown, Dublin 20 on the following grounds:

I own and reside at No. 10 Oak Court Grove, a two-storey house located to the south east of the site, approximately 15m from the site boundary. My house is a private dwellinghouse as are the houses within the estate in which I live, I have a number of windows on the rear of my house that enjoy privacy and seclusion at present. The proposal to construct a 5-storey development within this location is not acceptable, my house will suffer from the shadow of the development and will be seriously overlooked, the apartments proposed on the second, third and fourth floor plan will be able to look directly in the windows to the rear of my house and directly into my garden space. The garden space proposed on the development at fourth floor level will directly overlook my private amenity space.

South Dublin County Council Development Plan 2016 – 2022

Section 11.2.7. states The appropriate maximum or minimum building height of any building will be determined by:

➤ ***The prevailing building height in the surrounding area***

The prevailing building height in the area is 2 storeys, there are 2 storey houses to the north, east and south east of the site, a circle K garage to the south and a 2-storey commercial structure to the west, this does increase to a 3-storey structure along Palmerstown Park but is a stepped design from the predominantly 2 storey structure

➤ ***The proximity of existing housing – new residential development that adjoins existing one and / or two storey housing (backs or sides onto or faces) shall be no more than 2 storeys in height, unless a separation distance of 35 meters or greater is achieved***

There are numerous 2 storey houses located within a 35m radius of the site, No. 1, 5 and 7 Wheatfield Road, 170 & 172 Kennelsfort Road Upper, 215A, 215, 213 & 211 Palmerstown Avenue and 8, 9, 10, 11, 12, 13, 14 & 15 Oak Court Grove. All of these houses are within 35m of the site and therefore a development in excess of 2 storeys in height is a direct contravention of the County Councils Development Plan

➤ ***The formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to the width of the street, or area of open space***

The development proposed is not a cohesive streetscape pattern, the proposed contiguous elevations shown on drawing No. PL-005 shows a variation in heights on Kennelsfort Road Upper from existing ridge level of house 8.337m, proposed development 18.1m and Circle K garage 5.343m, i.e., the proposed structure will be almost 10m higher than the adjoining house and almost 13m higher than the adjoining garage canopy

On Wheatfield road the house ridge level on the closest site is 8m, proposed development of 18.1m and the Palmerstown Centre across the road is 11.9m.

The contiguous Elevations show that the proposed development is not in accordance with a cohesive street pattern or streetscape in any manner and in fact is an over scaled proposed development to make economic benefit for the developer, way in excess of the suitable development for the site in accordance with the County Development Plan.

Section 5.1.5

Policy UC6 Objective 1 states ' *To encourage varied building heights in town, district, village, local and regeneration areas to support compact urban form, sense of place, urban legibility and visual diversity while maintaining a general restriction on the development of tall buildings adjacent to two storey housing*'

It is clear that the proposed development does not take account of the adjacent two storey structures and indeed totally overlooks same.

Deliveries and Refuse

It is proposed to have internal refuse storage within the centre of the development, refuse from 50 apartments will require substantial storage areas which are not provided, there is also a commercial bin storage area which is inadequate to service 3 commercial properties, I am seriously concerned that the alley way adjacent to my house and the houses of Oak Court Grove will become an alleyway full of bins and a haven for vermin and anti-social behaviour.

The developer's intention is to use this alleyway purely for servicing the development and deliveries etc, yet the design statement shows this area is a pedestrian connection, there are no proposals for limiting delivery times or numbers of units in order to maintain the laneway clear for pedestrians.

It is likely that deliveries will be brought to the commercial units from early morning to late night, particularly as one of the proposed units is a bar and off licence, staff will no doubt be putting out bottles after clean up and this will create substantial noise nuisance on our properties. Delivery vans will have to reverse to the delivery doors along the laneway, these vans and lorries can easily view the rears of our properties as the wall adjoining the rear garden of our houses is circa 1500mm high, most delivery drivers will be sitting above this height, this is a severe invasion of our privacy.

Delivery vans and lorries will access the laneway from Wheatfield road, most will need to reverse into the laneway off the public road or alternatively reverse onto the public road from the laneway. This junction is already a busy junction and traffic congestion is the norm, the proposed use of the laneway for deliveries will create a traffic hazard on a busy junction.

The vans and lorries have no sightline in an easterly direction as it is blocked by the vegetation of the adjoining residential gardens, the vans will have to traverse the public footpath to get a sightline, this is extremely dangerous for pedestrians.

Appendix C of South Dublin County Council's waste plan states '*Sufficient access and egress must be provided to enable bins to be moved easily from the storage area to an appropriate collection point on the public street nearby*'. In this design the bins must be removed from the building into a corridor accessed by all the above mentioned and then brought to the street for collection. There is no designated area for washing the bins and presumably this will also occur on the laneway.

Sustainable Housing Design Standards for new apartments states '*Sufficient communal storage area to satisfy the three-bin system for the collection of mixed dry recyclables, organic waste and residual waste*' – there are 10 bins proposed servicing 50 apartments with no proposals for segregation of waste, there will not be sufficient space for the three-bin proposal system.

Parking and pull in areas

The development includes 4 parking spaces and sufficient space for 2 cars to pull in, all spaces are on the Wheatfield Road with no pull in area on the Kennelsfort Road Upper, all other spaces are across the road and are highly unlikely to be used when pedestrians must cross a busy public road. At the front of the site adjoining the Kennelsfort Road Upper a cycle lane commences at the site, there are traffic lights for a pedestrian crossing and a bus stop. It is inevitable that the lack of pull in areas or parking bays on the same side of the road as the development will cause congestion and disruption to the existing lanes when cars pull in across the bus lane and the cycle lane to run into the shop, betting shop or off licence.

Given the close proximity of Palmerstown Community School it is inevitable that there will be high numbers of children pedestrians in the location and every proposal should consider same, a lack of pull in areas creates illegal parking and in turn blocks drivers sightlines behind illegally parked vehicles, it also encourages parking on public walkways often leading to children walking outside the car on the public roadway, no consideration has been given to this critical safety factor of the design.

Ownership

The proposed development is partially contained on Folio DN5245 with Registered owner listed at Graham Kenny, there is no letter of consent on file from Graham Kenny to give permission to include the laneway as part of the development site

Quality of Design

The ground floor plan shows many features that are not feasible, for example the staff and patrons of the shop & pharmacy / bookmakers must share sanitary facilities with the kitchen staff from the gastropub, the toilets are accessed off the corridor that is used to bring the refuse from the residential units to presumably the rear laneway for collection, the corridor is also used for food deliveries for the kitchen, and all other deliveries, the corridor will also presumably provide a fire escape from the kitchen and the second means of escape from the pharmacy. From a sanitary and health point of view this design must be changed, the plan shows little regard for practical use of the site.

Section 6.13 of Sustainable Urban Housing Design Standards for New Apartments states ' Accordingly, planning applications for apartment development shall include a building lifecycle report which in turn includes an assessment of long term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered by the proposer to effectively manage and reduce costs for the benefit of residents.' The Building lifecycle report was omitted from the application and indeed the total disregard for building carbon energy and use was displayed in the total lack of intention to recycle any of the building materials during the demolition process.

Lighting and services

The lighting of the development has not been evaluated or modelled, its impacts on adjoining residential properties has not been considered

Services from the kitchen and 50 apartments has not been considered for example where is it proposed to bring the extract fans from the cooking area, there is a children's playground proposed on top of this area and surely, they cannot discharge onto a boundary wall, will they be brought 5 storeys high and if so, what is the visual impact of this.

Where will the extract fans from the refuse areas be situated, will they also be brought five stories high or will the fumes be extracted at ground floor level and filtrate into the upper storey windows.

Fire Safety

The apartments located on the eastern side of the building, Apartments 8 to 11, 22 to 25 and 36 to 39 inclusive are all accessed through a lift lobby that extends to the plant room in the basement, in the event of a fire in the basement the lift shaft is open through floors and provides a smoke chimney to all upper floor levels, thus leaving the escape route from all these apartments inaccessible.

Conclusion

Based on the above reasons I respectfully request that South Dublin County Council refuses planning permission as:

- (i) The proposed development would, having regard to the height and scale, and the use of materials, have an unduly overbearing relationship with adjoining properties and would seriously injure the visual amenities of the area.
- (ii) Notwithstanding the proposal to develop an existing commercial site for largely residential use, the proposed development would, having regard to its height, scale and design, be excessive in scale and form. The design of the proposed development shows insufficient regard for the sensitive and prominent nature of the site by reason of visual intrusion and overbearing design.
- (iii) The proposed development would be at variance with the pattern of development in the area and would seriously injure the visual amenities of the area.
- (iv) The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area and would set an undesirable precedent for unsuitable development contrary to the Development Plan.

I enclose the required submission fee of €20

Yours Sincerely,



JOAN SHEAHAN

Ms. Joan Sheahan

**An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department**

Telephone: 01 4149000 Fax: 01 4149104 Email: planning.dept@sdblincoco.ie

**Joan Sheahan
10, Oakcourt Grove
Dublin 20**

Date: 02-Nov-2021

Dear Sir/Madam,

Register Ref: SD21A/0271

Development: Demolition of the existing building on site and the construction of a 5-storey over partial basement, mixed-use development comprising a gastro pub/restaurant with off-licence, 2 retail units, associated bin stores, bike stores. 1 ESB sub-station, all at ground floor level; a small plant room at basement level; a total of 50 apartments (25 one beds and 25 two beds) on the upper floors, all provided with private balconies/terraces; communal roof gardens; car parking; motorcycle parking; bicycle parking; landscaping and upgrades to public realm including upgrades to existing pedestrian crossing on Kennelsfort Road Upper; and all associated engineering and site works necessary to facilitate the development on lands at The Silver Granite pub, junction of Kennelsfort Road Upper and Wheatfield Road, and at The Silver Granite car park adjoining Palmerstown Shopping Centre car park (accessed from Kennelsfort Road Upper via Palmerstown Park).

Location: Lands at the Silver Granite pub, Palmerstown, Dublin 20

Applicant: Hollyville Investments Ltd.

Application Type: Permission

Date Rec'd: 01-Oct-2021

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanála if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, www.sdblincoco.ie.

You may wish to avail of the Planning Departments email notification system on our website. When in the **Planning Applications** part of the Council website, www.sdblincoco.ie, and when viewing an application on which a decision has not been made, you can input your email address into the box named **"Notify me of changes"** and click on **"Subscribe"**. You should automatically

receive an email notification when the decision is made. Please ensure that you submit a valid

Please note: If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full contents of a planning application.

Yours faithfully,

M. Furney
for **Senior Planner**