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PEACE COMMISSIONER

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A Chara,

Observations re Silver Granite Proposed Development Ref SD21A/0271

I wish to exercise my right as an Elected Public Representative for the Palmerstown Fonthill Electoral Area, to make the following observations in respect of the proposed development at the Silver Granite Palmerstown Ref SD21A/0371, on behalf of many constituents who have contacted me on the matter.

1. This is a very important location and there is a real opportunity to enhance this part of the Palmerstown Community. There has been a Public House on this site for several generations and the local communities have grown up around it. There are some anomalies which I will go into further on, but this Planning Application needs to be looked at more in terms of Community Development than in Commercial terms. A lot of the arguments made by the proposers of the project supports this proposition.
2. The detailed reports filed with the planning application puts forward arguments as to why this is a good development for this area. It quotes National and Regional policies, but these have to be applied locally and I provide below a narrative that gives a view based on the lived experience of many local residents, so that these guidelines can actually deliver for communities as intended..
3. Our main contention is that the scale of this proposed development is way in excess of what the community of Palmerstown, especially the immediate residents, can absorb. As proposed it represent bad planning.
4. In its present form this development represents the worst of bad planning, would compound previous bas planning, and must be rejected.
5. The earlier Palmerstown settlement along Kennelsfort, Wheatfield, Turret and other roads as well as Palmerstown Ave were built pre 1963 and subsequent planning acts. These roads consist of terraced houses with large gardens but no public space. A number of subsequent poor planning decisions has aggravated the situation as set out in 6,7,8 and 9 below. While the current planning application can not be expected to correct previous bad planning, it should not make matters worse but alleviate their effects in as far as possible.
6. Previous planning decisions that now limit the options for new development include the decision, in the 1970s, to build the N4 so that it divides the community rather than the alternative route to the South through the California Hills, through what is now Cherry Orchard Industrial Estate and on through Palmers Manor.

7. Next, in the 1980s came the decision not to realign Kennelsfort Road upper from entrance to Woodfarm Acres Estate along a line to the West of what is now the Palmerstown Shopping Centre, through Palmerstown Court Estate, linking up with Cloverhill Road and the Coldcut.
8. Both these decisions mean that Kennelsfort Road is not just a service road for the estates and roads off it, but it is congested daily in both directions with obvious knock-on effects for any development at the Silver Granite. In addition, traffic rat running in both directions from the (now) R148 at the Oval to the Kennelsfort/Wheatfield junction at the Silver Granite makes life hell for residents on these and all roads in between.
9. Finally, in planning the Palmerstown Shopping Centre (now the major component of the District Centre) in the late 1970s, instead of it incorporating the Silver Granite and Circle K site, by locating in what is now Oak Court Estate it divided the site for the now proposed development, by developing to the West of the now saturated Kennelsfort Road. Were the site for the present proposed development situated to the section of the District Centre to the West of Kennelsfort Road, it could be viewed in a totally different light.
10. In short, the District Centre on which the present proposal is based is 95% to the West of Kennelsfort Road leaving only the Silver Granite and Circle K to the East. The footprint of the proposed development will occupy all the ground formerly occupied by the Silver Granite building as well as most of the current car parking/circulation area. If approved, this will create a very unsafe situation given its proximity to both the Kennelsfort and Wheatfield roads and junction. While technically the proposed site is in a District Centre, in reality due its location and road network with their level of traffic, it is at best more like a Neighbourhood Centre,
11. The Silver Granite, situated in a quite residential area of Palmerstown, was a thriving family Pub with a function room, two lounges and a bar, and, for a period it served bar food and was patronised by residents for family occasions and social gatherings. Later it functioned as a music venue, and I got a lot of complaints about local disturbance due to loud music both inside and outside the pub. In more recent times it added a type of Casino which also led to many complaints and even before the Pandemic there was a drop off in trade for the Public House.
12. There is acceptance locally that change is needed. However, while accepting the need for change there is serious concern that the development as proposed will seriously undermine the residential quality of the area. The accepted principle is that any development at this site should at the very least have a neutral impact on the immediate residential community.
13. The proposal for a five-storey development at this location is totally unacceptable and absolutely out of place in a community where all the adjacent buildings are two storeys. When one adds in the roof garden, this amounts to an effective six storey development. Totally out of place and is evident from the mock-up vestiges included with the planning application.
14. Despite the modelling provided with the planning application, the sheer height, bulk and dominance of a five/six storey building at this location will totally dominate the skyline and seriously undermine the quality of life for residents in the surrounding homes .
15. If the development goes ahead as proposed it will seriously undermine the value of residential property in the immediate vicinity.
16. Despite efforts to try and prove the contrary in the written submission from the proposers, a five/six storey development at this location will seriously damage both the sense of privacy and the actual privacy enjoyed by residents of homes in the surrounding roads and estates.
17. The proposal for fifty apartments at this location and on this site does not represent good planning. Even with the proposed individual balconies, the density is far too high and amounts to cramming the maximum number of people into a very small and tight space with only minimal circulation areas.
18. Given the number of one bed apartments currently under construction at Palmers Gate in Palmerstown Village only 800 metres away, the Palmerstown community does not need any more one bed apartments. Any apartments provided on the site of the Silver Granite should be two and three bed apartments, which would help address the housing needs in the area and beyond. This would complement and enhance the settled nature of the Palmerstown community and is in line with National and Regional policies.

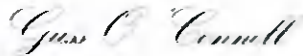
19. Given the location of the site at the junction of Kennelsfort Road and Wheatfield Road and its proximity to two storey homes in Oak Court Estate especially the Oak Court Close, Wheatfield Road, Palmerstown Avenue, Turret Road, Kennelsfort Road and Palmerstown Court and the topography of the landscape, a three-storey 2/3 bedroom development above basement, tastefully and sensitively designed, could be tolerated. This is in keeping with the policy as stated in the 2016 – 2022 South Dublin County Development Plan and meets National and Regional guidelines.
20. Even before the Pandemic, there was a belief that the days of the large Pub were numbered. Or at least fewer are required. This has become more apparent as the Country sought to adjust to a new normal. Given the popularity of coffee shops and cafes, it is questionable if even a Gastropub is sustainable at this location. There is quite a choice of restaurants close by in the Liffey Valley Shopping Centre offering a wide range of culinary options to meet everyone's taste. There are also the well-established Palmerstown House and The West County Hotel both very popular and patronised by Palmerstown people.
21. Given the provision for out-door dining at the ground floor level in the proposed development (which is sensible in any such development given our experience during the Pandemic), there are well grounded fears, given the provision also for the separate Pub, that late night drinking will be a source of ongoing disruption for existing neighbouring residents as well as for future residents of the proposed development.
22. There are Off-Licences located in the SuperValu Supermarket and the Circle K Petrol Station, both of which are located within the District Centre, and there is an Off-Licence adjacent to Palmerstown House only 800 metres away, which means that there is no need for an additional Off-Licence as proposed. It will only undermine the residential ambience of the proposed development and be a source of serious disturbance to the existing residential areas. The illegal consumption of alcohol in the laneway to the rear of the existing Silver Granite is already a serious public nuisance.
23. There can be no case for a Spar retail outlet in the proposed development. The area is already well served with the SuperValu Supermarket, the Lidl Store close by in the Cherry Orchard Estate and Tesco in the Liffey Valley Shopping Centre which is within walking distance of the proposed development.
24. There is also the neighbourhood late night convenience store in Circle K and several retail and convenience stores on Manor Road less than 400 metres away. Any convenience store in the proposed development will seriously undermine traders on Manor Road and the Circle K which shares the same site as the proposed development.
25. If granted planning permission, Spar convenience stores tend to operate late closing hours which will lead to unwarranted traffic in and through what is a residential area. Out of hours shoppers will be attracted from a relatively wide catchment area and the absence of onsite parking facilities will lead to illegal parking in nearby residential areas.
26. The area is already well served by Pharmacies with one in Manor Road, 400 metres away, and another in Palmerstown Shopping Centre in the same District Centre as the proposed development, and which is currently expanding its floor space. There is not any need for another Pharmacy at this location.
27. There is a total lack of adequate provision for delivery vehicles to serve the proposed Gastropub and retail outlets were they to go ahead. This will lead to serious disruption to traffic in the area and will have an adverse impact on the immediate residential area.
28. The proposal in the planning for the disposal of household waste is very vague and as described will add to the traffic problems for local and future residents.
29. In any development at the Silver Granite, the proposal for a roof garden must be replaced by Solar Panels of a type to maximise the generation of power for the new development.
30. The Transportation Assessment prepared by NRB Consulting Engineers, a desk exercise due to the Pandemic, cannot be taken seriously when it states that Wheatfield Road and Kennelsfort are only lightly and moderately trafficked respectably.

31. Wheatfield Road is a residential area and not designed for the purpose NRB Consulting apportion it. It, and adjacent roads, have a higher-than-average percentage of older and very young children. It already serves two large national schools and three creches. It can not support 50 Apartments, a Gastropub, a Spar and a Pharmacy and be the main access and egress for all deliveries and all traffic in and out of the proposed development. Wheatfield Road is not traffic calmed as claimed by the NRB Consultants but has one ramp close to its junction with Kennelsfort Road.
32. Kennelsfort Road Upper is congested in both directions at least three times every day: Morning, Noon and Evening. This is a sub-urban residential road not designed to carry the type and volume of traffic it already does. How do the Consultants believe that the proposed development with 50 Apartments, a Gastropub, a Spar Convenience Store and a Pharmacy will not have an impact? The Silver Granite, which has seen a big decline in patronage hence the current development proposal, would not have generated anything like the traffic the proposed development will generate. Kennelsfort Road and its residents should not be expected to shoulder the burden of additional traffic from the proposed development.
33. Much is made of the provision of cycle parking for both residents and visitors in the proposed development. However, the NRB Consultants failed to identify that the two cycle ways on Kennelsfort Road are shared cycleways. Due to the heavy volumes of traffic, and excessively heavy vehicles who persistently ignore the weight restriction, these are extremely dangerous cycleways and are not to be recommended.
34. The proposed "upgrading" of the pedestrian crossing at the junction of Kennelsfort Road/Wheatfield Road to a raised platform and a Toucan crossing is minimalist to say the least. This is already a very dangerous location and the Pedestrian Lights for this controlled crossing were only erected after the local community had raised the funds through events and voluntary subscriptions.
35. Pedestrians are in danger from traffic approaching from Wheatfield Road and turning left when they can be unaware of either a pedestrian crossing or the fact that the lights may be against them. There have been a number of near misses at this junction.
36. Any development at the Silver Granite must include a fully controlled Kennelsfort Road/Wheatfield Road junction incorporating an integrated Toucan crossing.
37. The current plans for the Silver Granite development propose to use the Shopping Centre car park and to have access and egress at the current entrance, The NRB Consultants state that this is acceptable. It is not acceptable and is bad planning. This entrance, and the junction with Kennelsfort Road, is already way beyond capacity and local traders have to physically control traffic there at certain times, which are becoming more and more frequent. This junction is the only access point for Palmerstown Cemetery, the two adjacent residential estates and the Palmerstown Shopping Centre. It cannot absorb the additional traffic even from a much-reduced Silver Granite development.
38. Any proposed development at the Silver Granite that includes an intention to avail of car parking on the Western side of Kennelsfort Road must correct the current unmanageable situation. The barrier at the official "entrance" to the Silver Granite car park (portion of the Palmerstown Shopping Centre Car Park) clearly market "Silver Granite Car Park" is perpetually closed. This "entrance" should be abolished and moved further up the road to the right opposite the Wheatfield Road exit. The newly created junction of Wheatfield Road/Kennelsfort Road/Silver Granite(Palmerstown Shopping Centre Carp Park) must then be controlled by a full set of traffic lights that incorporate the Toucan Pedestrian crossing.
39. As is clearly shown in the Report submitted by the proposers of the development, pre-planning consultations have taken place, as is their right, with the planners and other sections of the Council going back as far as 2018. The proposers of the development state that these consultations influenced their final plans, However, no such consultations took place with the local community or local public representatives, If they had taken place, then a more suitable set of plans could have emerged that would address the needs of all stakeholders and result in better planning.

40. Taken the points, raised above, into account and the stated objectives of the current proposers of the development, to address the need for housing, would it not make sense to turn the whole development over to housing. This is reinforced by the fact as set out above, that the east side of Kennelsfort Road is residential except for the Circle K Service Station and the Silver Granite. There is an expressed need across the Palmerstown Community for "right size" accommodation. Not surprising, given the current demographics and settlement pattern of the Palmerstown community down the years, many now want to move from a 3/4 bedroom dwelling to a smaller unit while remaining in the community. The Silver Granite site is one of the very few possible locations for such a development.
41. The site would lend itself to a mixed residential development of 2/3 bedrooms (as Fr Scully House in Gardiner St) no higher than three storeys, where the ground floor be given over to over 55s for independent living and the upper floors to couples and families as starter homes. The provision of suitable indoor and outdoor social areas would promote integration and solidarity.
42. Or the whole development could be designed for 2/3-bedroom units to meet the needs of families that find it difficult to get their feet on the housing ladder. All of this could be done in an environmental and economically viable manner, and certainly be more socially viable.

The present Planning Permission Ref SD21A/0271 should be rejected as it does not represent good and proper planning for the area.

Yours truly



Councillor Guss O'Connell PC
4th November 2021