

**AN BORD PLEANÁLA**  
LDG- 049/40.22  
ABP- \_\_\_\_\_  
14 FEB 2022  
Fee: € 20 - Type: PLW  
Time: \_\_\_\_\_ By: Post

Keith Palmer and Laura Doyle  
23 Palmers Crescent,  
Palmerstown Manor,  
Dublin 20

Re: AAI Palmerstown Limited application for permission for a strategic housing development at Units 64 & 65, Cherry Orchard Industrial Estate, Palmerstown, Dublin 10 Reference: SHD 3ABP - 312430 - 22

A chara,

We wish to submit an objection to the proposed application for the Orchard Gate SHD development at the Cherry Orchard Industrial Estate/Kennelsfort Road junction in Palmerstown Dublin 10.

At the outset we want to make it clear that we are objecting to this proposed development as it does not represent good or proper planning for this area of South Dublin. Our objections are based purely on planning grounds.

The current road infrastructure of Kennelsfort Road as it stands is barely able to accommodate the level of traffic that utilises the road on a daily basis prior to any additional development.

The proposed development in Cherry Orchard Industrial Estate to which we are objecting will compound the issue turning Palmerstown effectively into a car park. It is also important to consider the already anticipated higher traffic volumes in Palmerstown in the near future resulting from other recently approved developments in the area and this is prior to any development at the Cherry Orchard Industrial Estate site. The other developments include:

- The apartments at the Silver Granite (50)
- Palmerstown Retail Park development (Randalwood) in the Village (274)

Furthermore, the impression created of Kennelsfort Road by the artistic illustrations accompanying the plans for the proposed development is of a wide boulevard – this is totally incorrect and completely misleading. Despite the images in the Orchard Gate presentation, Kennelsfort Rd is barely wide enough to cater for a single line of traffic in each direction and two bicycle lanes with no room for overtaking. The traffic levels at peak times can currently cause huge backlog on Kennelsfort Rd. The congestion caused by the additional traffic generated by the proposed development has the potential to significantly increase these delays to unacceptable levels and negatively impact the lives of existing inhabitants.

It is our view that the road will not be able to cater for the increased traffic levels resulting from the already approved projects before we even consider the Orchard Gate developments.



The traffic issues will be further exacerbated by the latest news that there will be only one entrance/exit point at the Palmerstown Retail Park development, which is adjacent to the N4 intersection. To grant planning permission to the Cherry Orchard development would be irresponsible and considerably damage the quality of life of existing residents.

Another existing issue that will be compounded if the Cherry Orchard Industrial Estate development is granted permission is public transport. The radial bus service in Palmerstown is inadequate as it currently stands and the No.26 bus service cannot cater for the current number of users. If the already approved developments are factored in the bus service will be completely strained and this is before the Cherry Orchard Industrial Estate development is considered.

While the need for additional housing in Dublin is acknowledged, any proposed housing development at Cherry Orchard should be conventional housing only i.e. two story semi-detached. The arguments being made by the Cherry Orchard Industrial Estate developers that additional housing is being developed and made available is not valid as the proposed development will not provide sustainable family housing, but rather buy to let housing which is not an appropriate solution to the housing crisis and not keeping with the character of Palmerstown.

If the proposed development is granted permission it will further compound the housing issue in the area as land that could be used to enhance the Palmerstown community is lost to profiteering developers who do not care about the area but are simply trying to maximise profits by developing as many dwellings as possible without any real consideration being given to the locality, its inhabitants or the impact of the proposed development which I reiterate is completely contrary to sound planning practices. An appropriate development in keeping with the existing locality is required.

In addition to the points raised above, there is insufficient educational infrastructure in place to accommodate the existing residence of Palmerstown before adding additional demand from the Orchard Gate development and the other developments that have been granted permission. There are long waiting lists for creches, primary and secondary schools. If children move into these proposed cramped developments where are they going to go to school?

Another key consideration is the negative impact on property prices. Given the height, bulk and scale on such a relatively small area, the proposed development at Cherry Orchard Industrial Estate will seriously devalue our home and contravenes the South County Dublin Development Plan 2016 -2022 in the following areas:

- H7 Objective 1: To ensure that residential development contributes to the creation of sustainable communities.
- H7 Objective 4: That any future development of both residential and/or commercial developments in Palmerstown Village and the greater Palmerstown Area shall not be higher than or in excess of three stories in height.
- H8 Objective 4: To support proposals for more intensive enterprise and/or residential led development within areas designated with Zoning Objective 'REGEN' (To facilitate enterprise and/or residential led regeneration), subject to appropriate design safeguards and based on traditional urban forms that adhere to urban design criteria.



- H9 Objective 2: To ensure that higher buildings in established areas respect the surrounding context
- H9 Objective 3: To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing
- H9 Objective 4: To direct tall buildings that exceed five storeys in height to strategic and landmark locations in Town Centres, Mixed Use zones and Strategic Development Zones and subject to an approved Local Area Plan or Planning Scheme. (AN AREA PLAN GAD NOT BEEN PREPARED FOR THE CHERRY ORCHARD REGENERATION ZONE THEREFORE THIS APPLICATION IS PREMATURE).

While accepting that due consideration must be given to Section 8 (1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, where the proposed development materially contravenes the County Development plan, other than in relation to the zoning of the land, indicating why permission should nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000, selective consideration only has been given in the report when referring to the South Dublin County Development Plan 2016 -2122 objectives pertaining to the proposed development and planning application. No account has been taken of the traditional residential area where Orchard Gate is located.

We are specifically concerned that the 9-storey development in contravening the current development plan, in that the height is not consistent with the current two-storey housing structures in the area, will set a precedent that will totally destroy the quality of life for existing and future residents. We do not believe that this planning application is in keeping with the intention in the South County Dublin Development Plan 2016-2022 to rezone the lands at Cherry Orchard to Regeneration.

In summary, the Palmerstown area cannot tolerate the latest proposed development for another 144 apartments, with 65 parking spaces at the Orchard Gate SHD development. This proposed development is totally out of place in the residential area of Palmerstown. Furthermore, as the land has been rezoned, this removes commercial space which could bring further employment into the area which is another significant drawback of the proposed development.

Therefore, it is our view that the application should be refused, and the proposed development should not proceed on the grounds that it does not represent good or proper planning for the area.

Please find enclosed the required €20 fee.

Yours sincerely,

*Keith Palmer*

*Kevin Dwyer*