

1 Palmers Lawn
Palmerstown Manor
Dublin 20.

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902.

31st January, 2022.

AN BORD PLEANÁLA
LDG- 048693-22
ABP- _____
07 FEB 2022
Fee: € 20 Type: cheque
Time: _____ By: post

**Re: SHD3ABP-312430-22 – Planning Application for “AAI Palmerstown Limited” Development,
Units 64 and 65, Cherry Orchard Industrial Estate, Dublin 10**

Dear Sir/Madam,

I wish to make an observation on the above development at the junction of Cherry Orchard Industrial Estate, Dublin 10, and Kennelsfort Road, Dublin 20:

(1) There is no Letter of Consent from Argbandouagh Ltd. giving consent for development work to be carried out on their land. Argbandouagh Ltd. is described the owner of land on the southern and western edges of this proposed development. The map describes the land as “lands under applicant control”. No evidence of this is presented. How and where is this control evidenced and demonstrated? E.g. Letter of Consent, copy of lease, copy of relevant legal document(s), etc.

(2) there are a number of Material Contraventions of the South Dublin County Council County Development Plan 2016-2022. Each Material Contravention is a serious problem in its own right. The County Development Plan was meticulously crafted from Planning Experts in SDCC, the democratically elected Councillors on SDCC (including our local Councillors who live in the area) and consultation with the local residents, so it is no minor matter to have multiple Material Contraventions in a Planning Application for a development which we will be forced to live with long after the Cork-based developer has taken their profit and left the area. Material Contraventions in height, in distance from neighbouring houses, and the complete absence of 3-bed units in the development (which they partly use to justify no Childcare provision in the development!) make this proposal unacceptable in good Planning Practice, and as such militate against the principles of proper planning and development of the area,

(3) is An Bord Pleanála aware of the nearby “Palmers Gate” apartment development being built at the junction of Kennelsfort Road and the N4 / R148 at Palmerstown Village (the former “Vincent L. Byrne” site)? Or the application for a new high-rise apartment development 400 metres to the north of this site at the junction of Kennelsfort Road and Wheatfield Road (the current “Silver Granite” pub site) (Planning Ref. SD021A 0271)? “Palmers Gate” is now being built and will add to our already severe traffic congestion and Childcare / school place usage in the area. If the “Silver Granite” development is approved, that will lead to even further traffic congestion in the immediate vicinity of this proposed development. Exactly when will the Planning Authorities realise that traffic congestion in this area of South Palmerstown has already exceeded the physical capacity of the road network?

(4) the development is of excessive scale for the area, representing overdevelopment and excessive height on this site in this area, and as such militate against the principles of proper planning and development of the area,

(5) the height, form and scale of the proposed development is completely out of character with the local built form, which is mainly low rise in nature, mostly 2 storey houses, low rise industrial units and a low rise

local shopping centre. There is a step change from the 2 storey houses in Palmers Park and Palmers Crescent (not Palmerstown Crescent, as is incorrectly stated on one image) to a 9 storey apartment block, where the nearest 2 storey house is less than 35 metres from the 9 storey apartment block, and as such militate against the principles of proper planning and development of the area,

(6) the proposed development would be visually incongruous in the existing site context and would be out of character with the area due to its vastly excessive height and radically different external appearance as a Modernist building in an area dominated by mid- and late 20th century conventional housing in vernacular architecture, and as such militate against the principles of proper planning and development of the area,

(7) the height of the proposed development is far too high and excessive in such close proximity to existing 2 storey homes, which will be overshadowed at times of the day by the development, and as such militate against the principles of proper planning and development of the area,

(8) the cumulative impact on the community for both existing and new residents must be considered, in terms of mobility, transport, school places (primary and secondary), child care places, and the already very excessive traffic levels in the area,

(9) additional traffic in this area will contribute to the further severe traffic problems we already have to live with, and cannot be sustained by the existing road network there,

(10) are there enough car parking spaces established for the size of the proposed development? Or does the developer want residents to park their cars outside the existing industrial units in Cherry Orchard Industrial Estate (which is unlit at night – I know because I live here and I drive through it at night) or outside the existing houses in Palmerstown Manor estate? 1 bed apartments can have a couple living there, both of whom own cars. Similarly a 2 bed apartment could have up to two couples living there, each of whom own a car, giving 4 cars per apartment in those cases,

(11) there is clear Sunlight impact on houses in nearby Palmers Crescent and Palmers Park. Thus the height of the development is excessive,

(12) proposed working hours should finish at 7.00pm, not 8.00pm, and there should be no working there on Sundays or Bank Holidays.

The Material Contraventions alone should lead to this proposal being rejected fully. The other points made above should also lead to this proposal being rejected outright.

Overall, this proposed development is wholly excessive and inappropriate in its context, materially contravenes the County Development Plan and militates against the principles of proper planning and development for this area, and does not represent good planning for the area.

Please find enclosed a cheque for €20.00 for the fee.

Yours sincerely,

Neel Carr