

**Our Case Number:** ABP-318607-23



Residents of Park West Point (incl. The Academy, The Crescent, The Concert)  
c/o Tracy O'Brien  
93 The Academy  
Park West Pointe  
Dublin 12  
D12 N122

**Date:** 2nd February 2024

**Re:** Proposed construction of a residential led mixed use scheme across 16 blocks within 9 buildings ranging in height from 4 to 15 storeys  
Lands at Park West Avenue, Cherry Orchard Dublin 10. Bound by Cloverhill Road to the north, Cedar Brook Avenue and Park West Avenue to the east, Park West Cherry Orchard Rail Station to the southeast & the M50 to the west

Dear Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

JA02

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

# Objections- Cherry Orchard Point LDA plan

## Prioritise Infrastructure and Low-Rise Housing in Cherry Orchard Point LDA Plans

**To:** An Bord Pleanála  
64 Marlborough Street, D1

**From:** Residents of Park West Pointe including The Academy, The Crescent and The Concert Buildings

**Contact Name:** Tracy O'Brien

**Address:** 93 The Academy, Park West Pointe, D12 N122

**Email:** parkwestneighbours@gmail.com

**Phone:** [REDACTED]

**Case:** 318607

**Development:** Cherry Orchard Point

**Fee paid:** €50

**Date of online submission:** 27<sup>th</sup> January 2024

This observation is being made on behalf of residents of Park West Pointe Apartments comprised of 3 buildings: The Academy, The Crescent and The Concert which are adjacent to the proposed development of Cherry Orchard Point - Case: 318607.

We have serious concerns about the current version of the LDA proposal and believe the plan in its current design would result in a piecemeal and fragmented development with a lack of appropriate infrastructure & amenities being prioritised.

The current plan greatly lacks a plan for coherent integration with the current housing developments in the area and we believe without amendments it will have a hugely negative impact on the current residents of Park West Pointe, Cedarbrook & Cherry Orchard.

Below we detail our concerns in line with the below plans and published reports:

<https://cherryorchardpointphase1partx.ie/application-documentation/>

<https://cherryorchardpointphase1partx.ie/application-drawings/>

<https://lda.ie/uploads/images/Cherry-Orchard-Public-Feedback-PDF-FINAL-June-2023.pdf>

<https://lda.ie/uploads/images/Community-Stakeholder-Engagement-Report-Cherry-Orchard-Point-Nov23.pdf>

### **Height and massing of proposed residential buildings**

The LDA state (Community & Stakeholder Engagement Report November 2023 Prepared by: KPMG Future Analytics Cherry Orchard Point):

*"This designation followed on from the Dublin City Development Plan 2016–2022 statement that locations close to the rail station and M50 within the LAP area were suitable for landmark focus points owing to their potential to act as placemakers and to enhance the identity of the area. It is notable that a precedent for higher buildings in the area was established with the 2021 approval of a Strategic Housing Development (SHD) at Park West Avenue and Park West Road which features a 46m high, 15-storey building. The proposed 15-storey landmark building with a building height of c. 52m is significantly lower than the maximum building height allowed at this location and is considered to be consistent with the established environment. The Phase 1 proposal is designed with a combination of 'High Density' and 'Medium Density units.'"*

- Large scale blocks of apartments at 15 storeys high are not conducive to cohesive community living. The excessive height, bulk, massing of the proposed buildings, would result in the over development of the site and would constitute an overly dominant, overbearing form of development.
- The proposed "landmark" 15 storey building is completely excessive in scale and incongruous to the existing Park West and Cedarbrook complex's. 15 stories building combined with the proposed medium density buildings both adjacent and directly across from this will have an adverse effect on the light and compromise optimum exposure to daylight for the apartments in parts of Park West Pointe and Cedarbrook.
- Blocking and Obstruction of light for properties facing the new development will substantially reduce their Building Energy Rating and force excessive use of levels of heating and artificial light. This will disproportionately affect people both financially and from a mental health point of view.
- The proposed development would have a significant detrimental impact on visual amenity and would fail to successfully integrate into the existing surrounding area.
- There is no precedent for buildings that height in the area and the proposed height is not "consistent with the established environment". The closest apartments/building of significant height are 6 floors high. Anything over 7 stories has been proven to have a hugely negative impact on mental health. <https://www.mdpi.com/2078-1547/10/2/34> and <https://www.housingagency.ie/sites/default/files/publications/36.%20Design%20for%20Mental%20Health%20Housing-Design-Guidance-MAY-2017.pdf> This is an area with a significant number of social problems and this height of building will only potentially add to it.
- We need a combination of duplex housing and varied level apartments to enhance this area, making it more appealing to potential buyers and hence diversifying the social fabric of Park West / Cedarbrook / Cherry Orchard.

- While the location is close to the M50 there is no direct access and subsequently it takes an approx. 7-minute drive (depending on traffic levels) to get to the M50

We request that the following is considered, as while housing, especially low cost is badly needed in the country and we support that in our area, we do not support the mass and height of this proposed development and the potential impact on:

- Right to light and the impact on current residents of the area due to the imposing height of the proposed landmark building
- The lack of amenities and infrastructure in phase 1 of the plan – the area already has very few amenities and badly needs: shops, a park, community areas, green space and we believe there should be a plan in place to front end these facilities for the area as adding more residents to an area that has so few amenities already without a clear plan and timeline for adding the required amenities
- The potential for over development of the area is extremely concerning for residents and the LDA Planning does not appear to take into account additional developments in the area which really must also be taken into consideration when analysing the effect of the overbuilding and density in the area:
  - The existing Clondalkin and Ballyfermot areas, Cherry Orchard, Cedarbrook, Bernvill, Cloverhill road, Parkwest and all surrounding areas
  - The new Park West development, which was granted planning permission – 750 units (case 312290 - link provided below).
    - [https://www.pleanala.ie/en-  
ie/case/312290?fbclid=IwAR2Q0hfhZyISGP9wf8g8ewVEfXEnYTKViuSc  
ytwsogZauql7QH8RRUgnEGI](https://www.pleanala.ie/en-<br/>ie/case/312290?fbclid=IwAR2Q0hfhZyISGP9wf8g8ewVEfXEnYTKViuSc<br/>ytwsogZauql7QH8RRUgnEGI)
  - The new plan for development near Cherry Orchard hospital – 172 dwellings
    - <https://consultation.dublincity.ie/housing/cherry-orchard-part-8/>
  - The remaining three stages of Cherry Orchard Point 1,100 units in stage 1 only (case 318607)
  - Any other upcoming development case in the local area (e.g. 315216 – 1,087 units)
  - The new developments going on in Clondalkin area near the train station – 11,000 new units.
    - [https://www.sdcc.ie/en/devplan2022/neighbourhood-  
areas/clondalkin-clonburris-grange-castle/clondalkin.pdf](https://www.sdcc.ie/en/devplan2022/neighbourhood-<br/>areas/clondalkin-clonburris-grange-castle/clondalkin.pdf)
    - [https://suretybonds.ie/tuath-housing-park-west-plaza-office-to-  
residential-conversionharcourt-fit-out-or-refurbishment-e5m-to-  
e30m/](https://suretybonds.ie/tuath-housing-park-west-plaza-office-to-<br/>residential-conversionharcourt-fit-out-or-refurbishment-e5m-to-<br/>e30m/)

## **Security, Policing & Emergency Services**

The LDA state(Community & Stakeholder Engagement Report November 2023 Prepared by: KPMG Future Analytics Cherry Orchard Point):

*“The LDA will continue to engage with Dublin City Council and other stakeholders including An Garda Síochána with respect to wider social issues experienced in Cherry Orchard. It is notable that the Minister for Justice has established an Implementation Board involving all relevant State Agencies to help address the wider social issues facing the residents of Cherry Orchard which the LDA have had the opportunity to present the scheme proposals to and receive feedback on.”*

- Through our connection working with An Garda Síochána in specifically Ballyfermot Gardai in conjunction with the Park West Pointe Neighbourhood Watch residents of Park West are aware that they have not been consulted by the LDA and are not on the list of bodies that the LDA must consult to gain planning permission on the current proposal.
- Current experience of Park West Pointe residents is that the wider social issues in the area have not begun to be addressed by the Minister of Justice and in fact there has been an increase in vehicle theft and vandalism from the Park West Pointe apartments underground carpark and our apartment buildings continue to be vandalised at great cost. We have a huge concern that the LDA proposal does not address any of the issues in the area and that there is a sticking plaster approach to finding a solution to the housing crisis whilst not front ending amenities for the area in phase 1.
- The LDA did not actively consult with residents of Park West or Cedarbrook who are already directly impacted on the social issues in the area. The area historically and currently has a huge problem with anti-social behaviour, theft, and vandalism. Ballyfermot Garda station is already hugely under resourced, and there is nothing in the proposal that mentions increased Garda resource for the area with 1,131 additional residences.
- Potential for increased ASB and vandalism in the landmark building and public spaces; something that residents of Park West Pointe suffer with frequently in buildings of a much smaller scale. Our buildings that are constantly targeted by teens coming into the area intent on vandalism and theft. We have had to create a Neighbourhood Watch in conjunction with Ballyfermot Gardai and have had to spend a huge amount of increased security measures including reinforced building entrance doors, a GSM system for our underground carpark to combat consistent targeting by teens of vehicle theft and vandalism and additional CCTV camera. This is in addition to the huge costs incurred related to remedial works to fix the building damage we have suffered and continue to deal with on a daily basis.



The LDA also state (Community & Stakeholder Engagement Report November 2023 Prepared by: KPMG Future Analytics Cherry Orchard Point):

*"Management structures designated for Cherry Orchard Point will share responsibility in helping to safeguard the community from anti-social behaviour."*

*"All developments are designed with inclusivity, universal design, safety, and passive surveillance in mind."*

*"The Neighbourhood Park in the heart of the scheme is a car-free, high amenity park which will be accessible to all, both new and existing residents from the wider area. Residential buildings on either side will overlook the park helping to ensure the park is a safe and secure place for residents and the wider public to enjoy."*

*"Each block has its own secure and communal amenity space for the sole use of the residents of that block. Play space for younger children plus seating for parents and guardians has been proposed within each of the residential communal courtyards."*

- There is no detail on how they will encourage "passive surveillance" something that we can confirm does not happen without a wide-ranging campaign and buy in from residents.
- There is no detail of how the "management structures designated for Cherry Orchard Point will help safeguard the community from anti-social behaviour" – the area currently has huge issues with ASB with not enough Garda resources or planning and support from DCC to combat. There needs to be much more research, discussions and assigned resources including funding to the entire area to ensure that Cherry Orchard Point is well maintained, that there is a determined and clear plan on how DCC and An Gard Siochana will be resourced to combat current and potential ASB.
- We are concerned about the ownership of maintenance of the communal amenity space & play space as we really do not want to end up in a position with badly vandalised amenities that then bring more ASB to the area.

#### **Parks, sports and recreation facilities:**

These are badly needed in the area already and would be very much welcomed. There is no park, green space or in the Park West or Ceadarbrook area. We would request that these facilities be front ended to Phase 1 as residents of Park West have already had a negative experience where:

- When Park West Pointe got original planning permission for this development it was based on plans that had a park and green space - neither were developed as the developer "ran out of money." The areas that were designated has now been given

planning permission under Case 312290 for housing, again without any thought to green space or play facilities for children.

- Children in the area have very few areas where they can play and burn off energy and teens have nowhere to go.
- It is imperative that parks, sports and recreational facilities are part of any actual development and not just on the plans to get planning permission. It is also important they are built and open in any proposed phase 1.

### **Childcare & Schooling**

The LDA state (Community & Stakeholder Engagement Report November 2023 Prepared by: KPMG Future Analytics Cherry Orchard Point): *In terms of school places, the LAP acknowledges the existing limitation in the level of schools within the Cherry Orchard local area, specifically a need for a new primary school to serve the existing and future development of the Park West area. In addressing this need, the LAP has designated a suitable location for the provision of a new Primary School, which has been identified as a portion on the southeast corner of Key Development Site No. 6 toward Park West Road. The school development is expected to be delivered as part of a later phase on the LAP Site 6 to be managed by DCC. In addition, the LAP supports the expansion of the existing St Ultan's National School and/or the provision of an additional primary school, within the lands surrounding the existing school."*

- The LDA are stating that there is currently a limitation in the level of schools in the area yet they are not front ending this vital facility and are suggesting *"The school development is expected to be delivered as part of a later phase on the LAP Site 6 to be managed by DCC"* – we need a firm plan for increased school places within the area and it needs to be prioritised.
- The Ballyfermot area has already had school closures this year, there are currently not enough places for the children already living in the area to go to school in the local area. If half the proposed residences have an average of 2 children each that is an extra 566 children to find school places for.
- The plan mentions sustainability throughout, but 566 children having to travel outside the area to be educated is not sustainable in any sense of the word.
- Some of the schools mentioned in the proposal are DEIS schools and it is concerning that the LDA proposal believes this is the best way to build & develop a sustainable community.

There is a need for more schools and kindergartens for the children, who already live in the area. At present the spaces are insufficient to serve the current needs. The proposed plan has one kindergarten with only 90 spaces.

According to the proposed plans, the report says that stage 1 only will have a minimum of **2,219 people** living in the area. Potentially **831** of them will be children.

### **Calculations:**

Unit Type	# units	# people	Adults	Kids	Total people
Studio	28	1	1	0	28
1 bed	263	2	2	0	526
2 bed (3 persons)	52	3	2	1	156
2 bed (4 persons)	316	4	2	2	1264
3 bed (5 persons)	49	5	2	3	245
<b>Total</b>	<b>708</b>	<b>2219</b>	<b>1388</b>	<b>831</b>	<b>2219</b>

The figures are based on the Childcare demand report figures in table 1.1. which can be found in the link below.

<https://cherryorchardpointphase1partx.ie/wp-content/uploads/2023/11/2-1225-Cherry-Orchard-Schools-and-Childcare-Demand-Assessment-V5.0.pdf>

Table 1.1 Breakdown of the Residential Units Proposed

Unit Types	Total units	% Total
Studio	28	4%
1-Bedroom	263	37%
2-Bedroom (3 persons)	52	7%
2-Bedroom (4 persons)	316	45%
3-Bedroom (5 person)	49	7%
<b>Total</b>	<b>708</b>	<b>100%</b>

## Primary School

In the observations report in 2.7 (page 10) of the report it states: "The Local Area Plan 2019 identifies St Ultan's Primary School as the only primary school located within the Park West Cherry Orchard Local Area."

As shown in the report St. Ultan's and the other nearby schools don't have any places available for new students and a very long waiting list for kids in the area.

Table 4.1 Recorded Enrolments for Primary Schools

Roll No.	School	Female enrolment	Male enrolment	Total enrolment (2022/23)	Available Capacity (phone and email surveys)
20092T	St Ultans N S	191	175	366	NA
19575J	St Marys Junior N S	91	98	189	NA
19647I	St Marys Sen N S	103	108	211	20
19624V	St. Peter the Apostle JNS	130	143	273	NA
<b>Total</b>				<b>1,039</b>	<b>20</b>

St. Mary's is too far at 25 minutes walking distance or 10-minute drive from Cherry Orchard Point. If parents/guardians need to drive to school every day this will add to the traffic congestions already present in the area. It has **20 places only**, which also need to serve the needs for the children living in the nearby areas.

## Secondary school

- In Ballyfermot St Johns College, Caritas College, St Dominics College and St Setons have had to merge, increasing class sizes



## College and further education

There is only one college in the area, which only has the capacity to accommodate 660 students.

Table 4.2: Recorded Enrolments for Post-Primary Schools

Roll No.	School	Female enrolment	Male enrolment	Total enrolment (2022/23)	Available Capacity (phone and email surveys)
70041J	Collinstown Park Community College	271	310	581	Can accommodate 660 students - Minor availability for 2nd to 5th year.
Total				581	-

## Traffic Congestion

We are located close to the M50 and as such all adjacent roads in the area suffer from high volume traffic, noise pollution, and environmental degradation. This is not just at peak hours but consistently throughout the day. Any further development must be mindful of these existing challenges and incorporate sustainable solutions:

- We urge for infrastructure to be put in place before any additional development is undertaken.
- A new M50 (exit 8) to be opened prior the building project starts.
- With a high presence of Children already living in the area, we need additional Traffic Calming Measures to be put in place to slow down traffic in and around Cedarbrook area.
- The through road to Cherry Orchard Hospital (By the Community Garden Centre) to be opened.
- Trees be planted to reduce road noise adjacent to roads and the train station

## Public Transport

The LDA state (Community & Stakeholder Engagement Report November 2023 Prepared by: KPMG Future Analytics Cherry Orchard Point):

*"The site is well served by road, bus connects and rail infrastructure. The plans for DART+ and BusConnects upgrade to the immediate area will significantly enhance public transport provision and help to reduce car dependency in the area. The current LDA plans provide for the integration of DART+ and BusConnects into the development b means of safe, well-overlooked routes to the station and bus stops.*

*The mobility hub proposed is designed to prioritise pedestrians and cyclists and reduce reliance on private vehicle use. There is secure, sheltered bicycle parking in proximity to the train station, cargo bike parking, new bus stops to avail of the planned new Bus Connects*

*routes, e-bike parking and charging, taxi drop off, car club parking and charging, plus private e-car charging.”*

Public transport within the area is extremely lacking in terms of connections to neighbouring areas and facilities. We would specifically request that:

- The public transport network must be improved prior to adding additional housing. Presently there is no direct connection from Cedarbrook/Park West to Liffey Valley shopping centre and other key neighbouring areas.
- Train connections are increased as the existing schedule to and from the City Centre is extremely restricted in the evening at the weekend.
- The Luas line is extended from Long Mile Road over to Park West/ Cedarbrook and then on to Liffey Valley to improve connectivity and reduce high volume traffic.
- Electrification of the line to facilitate Dart + has not even begun, likewise improvements & reconstruction to bridges is also yet to commence <https://www.dartplus.ie/getattachment/b66e8b95-f95e-47f7-a101-ec6e2f83f82a/Preliminary-Options-Selection-Report-Executive-Summary.pdf>
- Based on the experience we have currently in Park West where a number of apartments are 2 car households and have to make use of overflow parking near the offices, the plan to reduce car dependency takes a huge amount of infrastructure improvements including designated bike lanes for safety and secure bike parking – “A total of 2,964 bikes were reported as stolen between January 1 and August 28, 2023. Over 70pc of these thefts were in the capital, with 2,124 bikes stolen in Dublin, according to gardaí. <https://www.independent.ie/regionals/dublin/dublin-news/over-2100-bikes-stolen-in-dublin-in-first-eight-months-of-last-year/a1024893579.html> and education of the overall benefits of replacing cars with bikes, without this people will not opt for more sustainable options. We would request this is revisited and a more defined plan and increased carparking spaces are added to the plan.
- With regards the proposed “car club parking” we previously had Go Car available in Park West but the car was removed due to vandalism. The proposed facilities sound fantastic on paper but the reality of introducing same into the area without a proper plan for security, CCTV and increased Garda resources is a huge concern that this will result in further incidents of ASB – the entire plan needs to be re-evaluated in line with the plan to increase Gardaí and for the LDA and DCC to take full responsibility for security of the area including a plan for CCTV coverage and monitoring of same.

### **Commercial Units within new Development**

The LDA state (Community & Stakeholder Engagement Report November 2023 Prepared by: KPMG Future Analytics Cherry Orchard Point):

*“The development design includes the provision of a convenience retail supermarket and 7 no. independent and co-located retail / commercial units located within a high-density area adjacent to the Park West Cherry Orchard rail station, in accordance with the LAP requirements. The leasing or sale of these commercial units for any possible future*

*businesses will be planned post the construction stage and will be flexible to accommodate the required uses / facilities for the area. The final uses will respond to market conditions and local requirements at the time of sale or lease"*

and...

**Phase 4:** 18,000 sqm of commercial/enterprise buildings along the M50, from 1 to 8 storeys high.

- It is a huge concern that commercial units are being left to phase 4 when the area currently badly needs retail and social facilities, we would hope that the phasing is reviewed, and retail and social facilities are front ended.
- While front ending may be a concern for the LDA, it is an ideal opportunity to provide low rent options to retailers and enhance the area.
- It is a concern that with the focus on sustainable travel & not providing carparking spaces for each residential dwelling in the proposal that retail and social facilities are not being front ended.
- We have significant concerns over this plan, as it has the potential to leave empty commercial spaces, reminiscent of the current situation in Park West when these spaces are now planned to revert to housing. Empty buildings lead to vandalism and further ASB.
- We need commitments from Dublin City Council that the community will have input into what commercial enterprises can operate, we have no desire to see business that will bring no community substance to the area.
- The proposal does not state any plan for the LDA to encourage social enterprise in the area with stabilised rent. We would like assurances that the retail space will be used for businesses that will add positively to the area with a strong focus on social enterprise & supporting new business ideas.
- At least one commercial property should be managed permanently by Dublin City Council and offered for shared use to local groups.

### **Project Management and Contacts**

As this is due to be a long-standing project (with multiple stages), which will specifically impact all residents within the area, we would request that proper channels are established to deal with all issues ranging from day-to-day inconveniences to more extreme events. Specifically:

- The measures that will be in place to prevent Vermin, Dust, Noise, Anti-Social Behaviour over the lifespan of the project, including
  - Confirmation of planned displaced vermin management and control
  - Confirmation of planned construction traffic, dust and noise management
  - Confirmation of security for the construction site to prevent ASB
- The findings of any Environmental Impact Study taken before the project begins and when will this be made available?
- The establishment of a community engagement individual who can liaise with the residents of Park West and Cedarbrook

- Details of who the Project Manager is and how we contact them?
- Information of where the Project Site Office is going to be located.
- Details of how we contact: D.C.C appointed Road Works Control Inspectors.
- Detailed explanation of what Direction/Control Ballyfermot Civic Office will have on this Project?
- The name of the Company who has the Tender to begin Construction.
- Information regarding how changes to the above personnel be communicated as the project moves within its own lifecycle and from phase to phase.