

SCANNED

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

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**Annette Costello  
18, Grangebrook Avenue  
Dublin 16**

**Date: 29-Sep-2021**

Dear Sir/Madam,

**Register Ref:** SD21A/0246  
**Development:** Construction of 8 houses comprising of 1 three bedroom two storey detached, Type B1 (c. 122sq.m) Site 1, 1 four bedroom 2 storey detached type B2 (c.134sq.m) Site 2, 6 four bedroom 2 storey semi-detached Type A1 (c.148sq.m) Sites 3-8 inclusive, all associated on and off site development works ,landscaping ,boundary treatments, removal of existing street boundary screen wall and the provision of vehicular and pedestrian access to Grangebrook Avenue on infill site of circa 0.226 ha.  
**Location:** Palmyra, Whitechurch Road, Rathfarnham, Dublin 16  
**Applicant:** Beckett Developments Ltd  
**Application Type:** Permission  
**Date Rec'd:** 03-Sep-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](http://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](http://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 email address.

**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

To Whom it Concerns

I am the owner of 18 Grangebrook Avenue, Rathfarnham, Dublin 16 and strenuously object to the approval of planning permission for 8 No 2 Storey Dwellings on Infill Site on lands at Palmyra, Whitechurch Road, with vehicular and pedestrian access from Grangebrook Avenue, Rathfarnham, Dublin 16 - Application SD21A/0246 and SD21B/0372

I have several concerns regarding the proposed construction of 8 new houses, but my predominant concern is based on health and safety. There is only one point of entry and exit to Grangebrook and Grangebrook Avenue is already subject to traffic congestion. Construction traffic would add to an already dangerous situation and pose an undue risk of injury to pedestrians trying to cross the road as there are several blind bends in Grangebrook. In addition, there is no continuous footpath at the front green and again pedestrians would have to be extra vigilant with construction traffic. In the event of emergency vehicles requiring access to the Avenue, there would be an increased risk of this not being possible due to the existing on street parking on both sides of the Avenue and any additional traffic. The traffic management measures detailed in the urban design manual material reflect aspirations for a completed project but do not consider the very real risks to residents and property in Grangebrook during any construction. The design criteria states that traffic speed control mitigation has been considered but it fails to acknowledge that a number of these measures were introduced by the Grangebrook Residents Association in response to current traffic management concerns

I am very concerned regarding the safety of residents with reduced mobility in the context of construction vehicles travelling up and down Grangebrook. The construction of Grangebrook was completed over 20 years ago and I and most residents regarded the completion of construction as a benefit to residing in this beautiful estate

The proposed design of the new houses is not in keeping with the current houses in Grangebrook. Despite the statements in the urban design manual material that form part of the documentation submitted with the application process, I fail to see how the new houses will complement the existing surrounding built form as their design has a very specific identify as a new modern and contemporary infill development. The proposed new houses will not provide a quality addition by the creation of an active streetscape that will support and contribute to the character of the area. The new houses will not be easily absorbed into the established patterns of development in the immediate vicinity. There is already over-development of Grangebrook in terms of the number of houses in the area.

It is my understanding that original planning permission for Grangebrook was granted based on a set number of dwellings with a proportionate area of open green space within the development. The proposal of an additional 8 dwellings without additional green space distorts the basis and balance of the original planning permission. The original Grangebrook deeds provided for 21 years access for maintenance of Palmyra, and this has now passed. There was no consultation with residents of Grangebrook regarding the potential development, opinions and this has now led to unnecessary worry, stress and expense in taking the time and effort to research and submit this objection

Regarding the Site Location Map, this includes grass verge/path outside of the boundary walls/land ownership. I believe that this is council land and would like to know if SDCC gave ownership to Palmyra and if so, please send me details of the transaction details and related governance of same

The planning application gives consideration to Palmyra such that it is not overlooked. However, there is no reference in any documentation that the same consideration has been given to Grangebrook residents. Palmyra has a functioning second access driveway further along Whitechurch Road, south entrance on western side of Whitechurch Road, which is regularly used - visible on [www.landdirect.ie](http://www.landdirect.ie). I have never seen vehicular access through the northern lane which runs parallel to graveyard. I would also refer to access to Palmyra and the development of the main house and query if the lane is too narrow for access for development of 8 houses, then how do Palmyra plan to access their site for their

work as it most definitely should not be through Grangebrook access. The development of Palmyra includes 2 storey flat-roofed rear extension. I believe that this was permitted as it would not be visible from the road. However, given the amount of removal of trees for the new development of houses, this will not be the case, as many houses in Grangebrook will now be able to see the new extension. Assessment of the suitability or impact of the extension to Palmyra had been considered on the assumption that the boundary with Grangebrook Avenue is as it is currently but this will not be the case.

The site notice was erected before the date on the submission to SDCC and with a degree of underhandedness put up in area where half of the residents in Grangebrook cannot see it including the residents in the bottom half of the estate that will be most affected by construction traffic, The drawing was not available for 10 days post lodgement of application, which stalled our observations. It appears to me that this planning application is a tick the box exercise and the developer is confident of a successful outcome which is completely against the purpose of the rules and procedures for a planning application

The developer's cover letter refers to A Certificate of Exemption, Planning and Development Act 2000 (as amended) Register Reference CE20/0042 was issued to the applicant on 23 October 2020. Please explain why the exemption was granted

With regard to the environmental aspects of the proposed 8 new houses, how will the developer protect the canopies and root structure effectively with large amounts of construction occurring. I noted that a very detailed ecological impact report from Forest, Environmental Research and Services Ltd was submitted with the planning application. As a resident, I have very legitimate concerns about:

- Disturbance of large numbers of birds of varying breeds roost in the canopies - see ecological survey
- Replacement of existing established trees removes multiple habitats
- How will construction access each site in-between trees on Grangebrook Avenue without damage??
- Inaccurate representation of trees on submitted documentation
  - Trees behind no. 33-45 not shown
  - D1194-1-05, 9 or 8 trees?
  - D1195-1-05, Tree no. 676
  - Leylandia Management since tree survey done in 2019 - further management since (lopping in 2020/2021 not represented)
  - Why remove native species of tree, naturally grown and replace with new trees
  - Tree line at back of houses - "minimising impact of existing vegetation" - just leave existing vegetation instead of removing it all
  - Arboriculture Report - 6.3 - how can character of the Avenue be maintained by removing 95% of trees?
  - Arboriculture Report - 6.4 - not appropriate - we don't want trees removed from GB and replaced ELSEWHERE. GB is a self-contained estate - POINTLESS removing what looks beautiful and useful to wildlife in OUR estate to re-plant elsewhere
  - Arboriculture Report - 6.6 - T749-T758 Located OFF SITE. Written permission needed to remove these trees
  - Arboriculture Report - 6.9 - how is there no need for special construction if trees are to be protected?
  - AR - 6.12 - Lime tree roots vulnerable to damage with construction of footpath/excavation works
  - AR - 6.13 - reducing canopy/replacing trees - how is this going to maintain the character of GB Avenue
  - AR - 7.2 - "positive visual impact on proposed development" - but it's taking away from the character by removing all the existing large trees

- AR - 8.9 - taking out natural selection of diverse trees already
- A Bat survey needed as bat activity observed during summer 2021. There are several old sheds etc on site, I understand that an ecological survey was completed in 2019 and an updated survey is required now
- It is contradictory to state that the character of Grangebrook will be maintained with removal of trees
- The SDCC Tree Management Plan provides for a maximum retention of trees. Residents in Grangebrook are trying to increase the trees in the estate and our residents association contacted Sean Lombard in SDCC regarding this specific matter earlier in 2021, prior to this planning application being submitted
- Removal of such a significant number of trees will have an adverse effect on the substructure of the soil and damage the integrity of the river, leading to damage downstream of Whitechurch Stream/River - page 23 of SDCC 2022-2028 Strategic Flood Risk Assessment Plan
- The habitat of herons and other birds along river will also be disturbed
- Deer regularly visit green spaces in Grangebrook
- Will foul drainage access works affect residents at both ends of Grangebrook? What level of engagement will existing residents have to have with their connections to Irish Water?
- No Roundup is planned in Grangebrook for weed control and I note the adverse effects to insect life, dangerous for children, animals (residential and wild)

In conclusion, it is my opinion that the proposed development of any additional houses in Grangebrook would seriously injure the residential or visual amenities of the area and is not appropriate or acceptable in terms of pedestrian or traffic safety and would not constitute an appropriate form of development at this location. It is not a proper or sustainable development in the area known as Grangebrook. I am pleading with SDCC to refuse planning permission

Yours sincerely

Annette Costello