

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

Telephone: 01 4149000 Fax: 01 4149104 Email: planning.dept@sdblincoco.ie

**Ian Smalley & Nikki Good
37, Grangebrook Avenue
Dublin 16**

Date: 05-Oct-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.

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, 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

Planning Ref SD21A/0246. Location: Palmyra, Whitechurch Road, Dublin 16. Applicant: Beckett Developments Ltd

Dear Sirs

We wish to make a submission in relation to the above planning application.

Trees

The tree survey submitted (Drawing D1194-1-05) does not accurately depict the number of trees which are to be destroyed to facilitate this development. For example, the line of mature trees immediately adjacent to the rear garden walls of numbers 33-45 Grangebrook Avenue - and on the site to be developed - are not shown on the survey. It also appears that the full extent of the tree coverage on the entire site is not accurately represented on the survey, thereby giving a misleading impression as to the number of trees that will disappear.

We also note that the topographical survey (Drawing 1194-1-02) submitted shows plenty of trees in the vicinity of Palmyra, but depicts no trees at all on the site in question, with the exception of the 9 trees along Grangebrook Avenue which are scheduled for retention.

The application is unclear in relation to these trees to be retained, which, we note, are not situated on land within the ownership of the applicant. The legend of D1194-1-05 indicates that 8 trees are to be retained, yet the drawing itself has 9 trees so indicated.

Tree T 676 (in the garden of proposed house 3) is indicated on drawing 191013-PD-12 as being retained, but this is not reflected on drawing D1194-1-05.

With the aforementioned inaccuracies, it is therefore difficult to know whether the "Tree Removals Plan" is an accurate depiction of what is to happen.

If the residents of Grangebrook are to be confronted with this development and see the sylvan nature of the estate disrupted, we don't feel that it is unreasonable for the developer to be required to submit accurate drawings which fully depict the consequences of the building, should permission be granted.

Likewise, there are concerns over the Arboricultural Report, prepared following a two-day visit in October/November 2019 - nearly two years ago. This report is inaccurate in relation to the Leyland Cypress trees (Section 3.4) which have undergone some management since the site visit. Again, with this known inaccuracy, how can the reader be sure there are not further inaccuracies contained within, due to the passage of time since the site visit was carried out?

The Arboricultural Report itself refers to the fact that "tree removals are required to facilitate the development" (Section 1.3). That is only true if the developer insists on squeezing 8 houses onto this site. How the "new high-quality tree planting elsewhere in the surrounding area" (Section 6.4) as suggested is of benefit to the residents of Grangebrook - i.e. those who will be at loss with the removal of these trees - is hard to fathom.

The report also states that "the retention of more trees on site was explored, however, from a design perspective, this was not considered feasible, as the proposal maintains the character and appearance of Grangebrook Avenue" (Section 6.3). This is illogical. How can the developer claim to be maintaining the character and appearance of Grangebrook Avenue, when the trees which form the backdrop to that stretch of the Avenue, and comprise its "character and appearance" are to be destroyed and replaced with houses?

Indeed, it is contradicted by the subsequent paragraph, which states that "the loss of trees will have an impact on the visual appearance and canopy cover in the immediate surrounding area" (Section 6.4)

As you turn into the Avenue and climb the slope you are greeted in the distance with an impressive canopy of trees. The vast majority of this will disappear, if this application is approved in its current format.

The policy stated under the South Dublin County Council Tree Management Policy 2015-20 is: "The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites"

The Council's *Green Infrastructure Policy and Heritage, Conservation and Landscape Policies* speak of preserving and protecting existing trees. There is little evidence of this in this application.

If every developer was to rely on the assessment that "generally, the surrounding area has large areas of private and public green space", (Section 3.3), will they all be permitted to remove trees from their sites, without replacement, and leave the surrounding area bare of trees except for the named "private and public green space"?

No trees on the site within the ownership of the applicant appear to be scheduled for retention, but, as previously stated, the position is unclear. From the documents submitted, a single tree on the land owned by the applicant may be scheduled for retention.

If the developer is sincere in maintaining the character and appearance of Grangebrook Avenue, they would submit a development with fewer houses which retains more than 8-10 trees.

Design

Quoting again from Section 6.3 of the Arboricultural report, if it is the intention of the developer to maintain the "character and appearance of Grangebrook Avenue", they should be requested to submit finishes to the houses which match those already on site. The existing houses were built in the mid to late 1990s, so I don't think anyone could be accused of "pastiche" if they were to do so, and it would appear to better serve their aim, as stated by their Arboriculturalist.

Each house should be provided with a driveway that can hold at least two cars. The lower portion of Grangebrook Avenue suffers greatly with the proliferation of cars within the estate and the lack of off-road parking. With the best will in the world, plenty of families with keen cyclists still have at least two cars.

Conditions should be attached to any grant of permission requiring the contractors to ensure that any houses are built strictly in accordance with the planning permission and any drawings submitted. If the current application is to be granted, particular attention should be given to ensuring that House No 8 is built no closer to the rear garden walls of nos 33-39 Grangebrook Avenue than indicated on the submitted drawings.

Conditions should be attached to any grant of permission requiring the contractors to ensure that the root systems of those trees to be retained along the Avenue are not damaged by the construction of the entrances to the houses or the footpath to the front of the houses, along the western side of the Avenue.

Density

We note that in the 2004-10 County Development Plan the lands of Whitechurch Lodge and Palmyra had a Specific Local Objective limiting development on the site to 8 houses. We have already seen the recent development of 10 houses on the site of Whitechurch Lodge, not including the 2 houses into which the Lodge itself has been converted. Little did we think when the SLO was removed that we might be seeing 21 houses on the site, rather than the previous 2.

Surely this is a case of overdevelopment?

We were a little surprised that the applicant has included the verge to the west of the Avenue within the site. They acknowledge in the site location map (drawing D1194-1-01) that it is not within their ownership. Do they have the permission of the owner, presumably South Dublin County Council, to do so?

Noise/Disruption

There is mention of a bat survey in the Ecological Impact Assessment report. It doesn't appear to be particularly thorough - compared to the surveys for birds and non-flying mammals - with little detail as to how the survey was conducted. Is this adequate?

Should the planning authority see fit to grant permission for this development, we request that effective conditions are attached to the grant of permission requiring the builders to adhere to strict hours of construction. We have all experienced builders in the vicinity who play fast and loose with these times. It will not be tolerated on what is already sure to be a disruptive experience for us all.

The contractors should also be conditioned to ensure that the road is kept clean of the dirt and debris which will inevitably arise from the construction site.

In summary, we feel that, if the planning authority feels that development at this location is appropriate, the developers should be requested to re-think their design, allowing for the retention of more than 8-10 trees on the site and providing natural screening between the development and the rear of Nos 33-39 on the Avenue. A development of fewer houses, with more trees would be a more sensitive proposal, and go some way to preserving the character and appearance of Grangebrook Avenue.

Yours sincerely

Ian Smalley & Nikki Good

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Rathfarnham
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