

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

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

**David & Barbara Jordan
55, 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

Application SD21A/0246

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.

David & Barbara Jordan
55 Grangebrook Ave
Whitechurch Rd
Dublin 16

We wish to make the following observations to the above planning application.

Observation No 1

Traffic safety. There is already severe traffic congestion on Grangebrook Avenue. There are also issues with speeding and reckless driving which have been reported. The bend in the road at the northern end of the proposed development is a blind bend of less than 7m width and there has already been a number of near misses. Adding more houses at this point would only add to this danger.

It should also be noted that there is no space available for a footpath at the ESB Sub-station on this bend so anybody using the footpath in front of the proposed houses would need to cross the road at a blind bend to continue their journey.

The introduction of driveway to roadway movements of vehicles on this stretch of road with limited visibility will also add to an already dangerous situation.

Observation No 2

The SDCC Development plan 2016-22. This states that there should be only 12 houses per hectare. Yet this development proposes eight houses on a 0.226 ha site with no additional green areas anywhere. This will alter the balance of houses to green areas that already exist within the Grangebrook estate and distort the basis of the original planning permission.

There was also only to be eight extra houses to be built between Whitechurch Lodge and Palmyra. There has already been a further eight houses built in the grounds of Whitechurch Lodge (now called Glinbury) so any further development would represent a gross over development. It should be noted that other applications for planning permission further up Whitechurch Road have also been rejected on the basis that they would represent an over development of the area.

Observation No 3

Effect on nature/wildlife. The proposed development will involve the destruction of a derelict where bats are known to roost. This shed is located at 53° 16' 30' N 6° 17' 04' W. These were seen at late as summer 2021. The removal of a large number of established trees and shrubs is at odds with Local Planning Aims of retaining as many trees as possible. These trees also provide nesting for a large number of birds in the area. No mention is made of what efforts will be take to protect the roots and canopies of any trees that are to be retained or what penalties ate the developers to be subject to if they breach these conditions. Mention of a financial contribution to improve the area are meaningless in relation to Grangebrook which has already reached the stage of mature landscaping.

Also of concern is the extra water run off to the Glin River as a result of removal of this vegetation and its' replacement with housing. It should also be noted that planning permission for housing further down Whitechurch Road has be rejected in the past due to the risk of flooding and the effect

on the river of the housing.

In planning application SD21B/0372 Palmyra was allowed the construction of a flat roofed two storey extension partly on the basis that it would not be visible from Whitechurch Road. This might no longer be the case with the removal of these trees. The proposed extension of Palmyra will be visible from the proposed new housing in this application with the removal of these trees.

Observation No 4

The design of the houses is not in keeping with the current houses in Grangebrook. They will in effect stick out like a sore thumb. The Planning and Design statement states that windows to the rear will be designed to avoid overlooking the property to the rear, i.e. Palmyra. There is no mention of not overlooking existing houses in Grangebrook. Indeed existing topography means that it is very likely that properties will overlook each other.

Observation No 5

Impact on the nature of the estate. Grangebrook is divided to two distinct areas each at different elevations. The gap between No.s 48 and 50 where the development is proposed forms a natural physical and visual break. It's a stretch of the estate with no housing and a tree lined transition. To alter it in the way proposed will cause the area to suffer a negative impact on the residential amenity and not be in keeping with sustainable development.

Observation No 6

Effect on ecclesiastical site. As outlined in the submission by Stephen Kelly and Lisa Battersby the applications S98A/0479 and S97A/0412 were rejected on the basis that they would affect the ecclesiastical site adjacent to Palmyra. This reasoning still holds.

Observation No 7

The proposed development would necessitate the destruction of a wall which is not the property of the developer. Also it involves taking over a green area which is in the charge of SDCC. Has any of this been agreed with SDCC prior to planning permission being applied for and does the terms and conditions under which SDCC took the lands in charge allow for this?

Observation No 8

Access to site and location of site compound. Construction traffic will only add to an already dangerous situation on Grangebrook Avenue. The deeds of houses in Grangebrook only allowed for access via Grangebrook Avenue to Palmyra for maintenance only for a period of 21 years. That period expired in March 2018. The alternative lane-way that was proposed as unsuitable has never been seen to be in use by residents of Grangebrook. Palmyra has a second access from Whitechurch Road which is regularly used and visible on www.landdirect.ie. Indeed this would be the access to be used for the development of Palmyra in planning permission SD21B/0372. If it is suitable for Palmyra's development then it can be used for this proposed development. No mention is made of where the site compound will be located. The only possible area in Grangebrook is the upper green on Grangebrook Avenue but this is in daily use by residents. Also no mention is made of where construction traffic would park. The proposed site is as previously mentioned on a blind bend and also on a steep incline.