

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

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

**Patrick & Angela Flood
68, Grangebrook Avenue
Rathfarnham
Dublin 16
D16X2R4**

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**

Patrick & Angela Flood
68 Grangebrook Avenue
Rathfarnham
Dublin 16, D16 X2R4
4, October 2021

Planning Department
South Dublin County Council
County Hall Tallaght
Dublin 24

RE: Application SD21A/0246

A Chara,

I am writing in relation to the planning application submitted by Beckett Developments Ltd. for residential development on lands to the rear of Palmyra, Whitechurch Road, Rathfarnham, Dublin 16. To this end, I enclose the required fee of €20 (Receipt Number: T4/O/686293).

I object in the strongest possible terms to the proposal to build eight residential dwellings on the site for the following reasons:

Impact to the character of Grangebrook

- The stretch between houses numbered 48 and 50 on Grangebrook Ave beautifully displays the sylvan character of our homes. To develop adjacent to this area could have nothing but a negative impact on this space.

Over-development in the area

- **FLOODING RISK:** The Glin River runs through Palmyra and the Grangebrook estate. I have a concern that further development in this area could lead to flooding and geo-technical risks in the area and further down-stream.
- **GREEN SPACES:** The SDCC Development plan 2016-22 dictates the numbers of houses that should be built in any green space. This proposed development will alter the balance of houses to green areas and will distort the permission that allowed Grangebrook to be built in the first place.

- **PREVIOUSLY REJECTED APPLICATIONS:** It should also be noted that planning permission for housing further down Whitechurch Road has been rejected in the past due to the risk of flooding and the effect on the river of proposed housing developments.

Impact to the 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.

Impact to the views surrounding Palmyra and the graveyard

- This land has had little done to it since the house was built in 1840, and rightly so. I truly believe that the owners of protected buildings and sites should act as their custodians and should therefore protect the unique nature of the property for future generations. This should be the case for Palmyra.
- With the removal of trees required to develop these eight houses, the backdrop of the graveyard would be ruined.

Increased traffic and parking demands

- The parking spaces available to residents is stretched as it is. Additional houses in the area would result in further resident and visitor parking requirements. This could lead to illegal or dangerous parking in the estate.
- The knock-on impact would be an increased risk to pedestrians, children playing, cyclists, and motorists.

Impact to wildlife and trees

Our area boasts a wealth of wildlife activity including birds, squirrels, otters, and bats.

- **BATS:** Bats are known to live in the old sheds on Palmyra and feed amongst the mature trees in the area. Having contacted the National Parks & Wildlife Service I learned that bats can only be disturbed if you have a Derogation License. As there is no Derogation License mentioned in this planning application, I would query what consideration has been given to this matter.
- **TREES:** This development cannot go ahead without the removal of several mature trees from the site.
 - I believe that a number of inaccuracies exist within the submitted Tree Survey including the fact that the trees behind house numbers 33-45 on Grangebrook Avenue are not shown. For me, such an omission would cast doubt over the entirety of the Tree Survey which has been submitted.

- The Arboricultural Report states that 63 trees will be impacted, including the complete removal of 58 trees. I ask, how can there be no impact to wildlife or to the character of Grangebrook (and indeed Palmyra) if this many trees are to be removed. I also dispute the claim in point 6.3 of the Arboricultural Report (page 14), as this development would not maintain the character and appearance of Grangebrook Avenue.

Palmyra's access to Grangebrook

- Original GB deeds state 21 years access for maintenance of Palmyra. Document dated 05/03/97 (page 10) would suggest that this right of access expired in March of 2018.

Existing access to the Palmyra estate

- Palmyra has two functioning access driveways along Whitechurch Road which are visible on Google Earth, on www.landdirect.ie, and from the footpath on Whitechurch Road. If this development was to go ahead, logic would dictate that the one of the existing access points is used and the boundary wall between Palmyra and Grangebrook remains untouched.
- If this lane way is suitable for Palmyra's other application (SD21B/0372) then surely it can be used for this proposed development.

Design of the houses

- The design of these houses is not in keeping with the character of Grangebrook. Aside from the face of the houses being different (which I can understand due to modern designs/tastes), the brick chosen on these houses is yellow, and not red like the houses already in the estate.

I appeal to the Board to consider this proposal in the overall context of Grangebrook, Palmyra, the Graveyard site, and the surrounding biosphere, and refuse it outright.

Sincerely,

Patrick & Angela Flood