

60 Grangebrook Avenue
Rathfarnham
Dublin 16
D16X4A6

3rd October 2021

The Manager
SDCC
County Hall
Tallaght
Dublin 24

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

Proposed 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.

Cash Office Receipt No.: T4/0/686627

To whom it may concern,

We wish to lodge the following observations to the above development, as follows:

This planning objection is contrary to the following on many levels:

- South Dublin County Council Development plan 2016-2022
- Principles of proper planning
- Sustainable Development
- European Habitats Directive
- Water Framework Directive
- European Impact Assessment Directive

The following points also need to be noted:

Palmyra - Private Residence - Planning Application

- The main house of Palmyra has a functioning MAIN driveway further along the Whitechurch Road to the south, on the western side of the road, which is regularly used and is visible on www.landdirect.ie (see Appendix 2 and Appendix 3). This is a fully functional driveway, which would be perfectly suitable for access to the site for development in this application. This would negate the need for access through the Grangebrook estate. The Grangebrook residents have never observed any vehicular access through the northern lane, which runs parallel to the graveyard and which is proposed to be unsuitable for construction traffic due to historical monuments.
- Palmyra plan to develop their existing private dwelling, with this planning application having been lodged in July 2021. However, if as they state in this application, that northern lane is too narrow for access for the development in application SD21A/0246, then how/where do Palmyra plan to access their site for their private house renovations? This would NOT be through the Grangebrook estate.
- Development of Palmyra includes a 2 story flat-roofed rear extension. This was allowed subject to the fact that it would not be visible from the road. However, given the volume of trees they are planning to remove in relation to application SD21A/0246, this will not be the case, as many houses in Grangebrook would potentially be able to see the new Palmyra extension due to the new development. Has there been an assessment of the suitability or impact of the extension to Palmyra given that planning was approved on the assumption of existing tree cover and an unchanged boundary wall with Grangebrook Avenue?

Boundaries

- Please confirm the official boundaries of Palmyra as stated in the original Deeds of Palmyra regarding their official boundaries, (see Appendix 1) (bottom of document). On www.landdirect.ie, it appears the boundaries extend to the wall that has been built between Palmyra and Grangebrook, not beyond it. However that development proposes to include the green space, including many mature trees, along the ascending Grangebrook Avenue, which is not within the boundaries of Palmyra.

Consultation with and Inclusion of Local Residents

- There has been no consultation with residents of Grangebrook regarding the potential development and therefore no formation of any relationship with residents.

Conservation Assessment

- Conservation Assessment 11.0.3 and 12.0.3 states “the site layout and individual houses have been designed to respect both Palmyra and Whitechurch Church”. However, there has been no consideration of the residents of Grangebrook. Similarly, the Conservation Assessment 13.2 states that Palmyra House and Whitechurch will not be directly impacted by the proposed development. However, Grangebrook will be significantly impacted by this development.

Traffic

- A Traffic Management Assessment of the current traffic is needed. With an additional eight houses on a section of the estate with no clear line of sight on bends and corners, leading to cars moving in and out of additional driveways, together with visitor parking on an already narrow road.
- There is a substantial safety issue regarding construction traffic blocking access/egress to residents at top of Grangebrook. At present, emergency vehicles and waste management vehicles have problems accessing the estate, as do vehicles in relation to development works on other private homes within the estate.
- In the Urban Design Manual criteria, and the Planning and Design Statement, it refers to “traffic calming mitigation measures, adequate sightlines, speed limits, signage, and local road alignment creating a safe street environment “. Unfortunately, this is not the case. Grangebrook have been reporting traffic management and safety issues for years, to no avail. The proposed development will bring more cars to the road, and it is situated on an existing dangerous bend in Grangebrook Avenue. Increased cars and traffic along that section of the estate will only serve to reduce a clear line of sight for residents. There is existing concern about the safety at the corners at the bottom of Grangebrook Avenue and at 48 Grangebrook Avenue. Complaints/concerns have already been made to South Dublin County Council by residents.
- There is existing difficulty accessing and egressing Grangebrook Avenue due to on-street parking, which is in place due to the existing number of houses in Grangebrook estate. This causes difficulty with adequate sight lines and causes significant traffic hazards for residents. The Site analysis, Access and Parking, and in Planning and Design Statement, states “this can be successfully achieved for both access and egress ...etc...”. This is contrary to the current situation.

Design & Planning

- The design of the proposed houses in application SD21A/0246 is **not** in keeping with the existing Grangebrook houses.
- The Planning and Design Statement, under the heading “Design and Layout” states “the general design of the proposed houses are in keeping with the finishes, height, scale, bulk and massing of that of the established pattern and style of the existing houses, thus ensuring architectural integration with the surrounding built form”. This wording is also mentioned in the Site Analysis under the Neighbourhood/Local Context. However, if you look at the existing houses and the proposed houses, this is very clearly not the case. The proposed houses do not look anything like the current Grangebrook houses.
- CGM views as contained in the Planning Application do not represent Grangebrook houses.
- In the Residential Amenity Section of the Planning and Design statement it states “design mitigation measures as previously referred, avoiding direct overlooking at 1st floor level have been employed”. This only applies to Palmyra with no reference made to the existing houses within Grangebrook in any report.
- In the Standards of Accommodation section of the Planning and Design statement, it states “to avoid direct over-looking of the property to the rear (Palmyra), the only windows located in the rear first floor elevation of houses No. 1 and 2, comprise solely of landing and bathroom windows of modest size and fitted with permanent obscure glazing”. There has been no reference made showing the same consideration for the relevant affected Grangebrook residents.
- We also see no reference to a Shadow Survey relating to the houses in close proximity to the proposed development eg: No. 31 Grangebrook Avenue and No. 33-45 Grangebrook Avenue.

Site Access

- Please advise the proposed location of the site access and compound area. The Arboricultural report, Section 2 states a compound cannot be put on any green space within the estate. The green spaces in the estate are used multiple times a day by all residents, their children and their animals.
- If the developers are planning to place a compound on any green areas within the estate it would render them unusable and unsafe negatively impacting the residents on an unimaginable scale.
- No Construction Management Survey has been provided. Please provide same.

Green Space

- No additional green space has been mentioned in any of the reports to be provided to the additional houses.

Certificate of Confirmation

- Certificate of confirmation letter TIC/4965/2019 - WHAT and WHERE is this?? Please provide this together with the consultants pre-planning documentation.

Site Location Map

- The Site Location Map includes a grass verge and path outside of the boundary walls and land ownership. However, this is council land. Did South Dublin County Council agree to this at pre-planning?

House Ratio

- South Dublin County Council Development Plan 2016-2022, states only 12 houses per hectare. This development is only 0.226 ha, yet has 8 houses proposed. Please advise how the number of houses was arrived at by South Dublin County Council at pre-planning, when a number of local planning applications were rejected as there were too many houses proposed relevant to the size of the land. The same reasoning should apply to this application.
- Analysis of proposal in respect of trees (arboricultural Report) 6.8 - site access and compound area - hasn't been designed yet but sufficient space available throughout site to avoid any unnecessary impacts to retained trees..... However

Trees

- It is proposed to remove 63 trees/groups of trees for the proposed development. This leaves 1.5% of the trees in the site proposed to be developed. This is contrary to the South Dublin County Council Tree Management "Living with Trees" Policy, which states that 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. This is not apparent in any sense.
- How will the developers ensure that the tree canopies and root structure are effectively protected with large amounts of construction occurring?
- How will construction access each site in-between trees on the Avenue without damaging the trees?
- Trees will have to be pruned significantly to access each individual house site, which will add to the removal of vast amounts of canopy within the site, and thus will remove roosting sites and ecological habitats.
- Arboricultural Report - 6.9 states no special measures of construction are required. The nature of construction involves heavy machinery that is likely to affect the RPA's of these trees T750-T758.

- It is stated in the Arboricultural report 6.13 that management options include “reducing the canopy of the tree or completely removing and replacing the tree with a similar species in the same location”. This is a “get-out-of-jail-free card” for the developers. Retention of trees will not be a priority, meaning a mature Lime tree will likely be damaged and then replaced by an immature tree of unknown health, further impacting the removal of mature trees, impacting both ecology and the character of the estate.
- Removal of 98.5% of established trees and woodland will see a detrimental amount of disturbance to varying bird species that roost in the canopies, and multiple other fauna that live in the ecology of the site.
- Arboricultural Report 6.4 proposes to re-plant the removed native trees in the local area - this is a waste of existing trees, many of which are mature and a source of diverse ecology, and removes a significant number of trees from the immediate area of Grangebrook. Grangebrook is a self-contained estate and it is pointless removing what looks beautiful, essential to wildlife and creates the character of Grangebrook Avenue and re-plant these trees and woodland elsewhere.
- The Arboricultural Report - 7.1 states “the proposal has been designed so it is within the local character of Grangebrook Avenue”, and 7.2 states the “new tree and shrub planting.....can have a positive visual impact on proposed development”. The existing character of Grangebrook estate is due to the number of trees within the estate as one ascends the Avenue.
- Removal of such a significant number of trees from this site 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.
- Arboricultural Report 6.2 - states that “3 off-site 3rd party owned Sycamore trees (T715, T716, T717) are removed to facilitate the pedestrian footpath proposed along GB Avenue”. These are not the property of the developers. Grangebrook is actively looking to **increase** the number of trees within our estate, not decrease them.
- Arboricultural Report - 6.3 - how can the character of Grangebrook Avenue be maintained by removing 98.5% of trees that give it its character as one ascends the Avenue?
- The Arboricultural Report - 8.9 states “new tree planting should take into consideration the character of the local landscape”. However, this would not be necessary if the natural selection of diverse trees already growing on site were not removed.
- In planning application Ref: SD19A/0105 on the Whitechurch Road, “the design fails to take sufficient account of the number of the existing green infrastructure onsite including extensive trees, hedgerows and woodlands, a high proportion of which is proposed to be removed”. If this was one of the reasons this development was rejected, the same should apply to the application SD21A/0246.

- There has been an inaccurate representation of trees on submitted documentation
 - i. Trees behind no. 33-45 not shown (point iv. below also strengthens this argument re maintenance)
 - ii. D1194-1-05, 9 or 8 trees?
 - iii. D1195-1-05, Tree no. 676 (pine tree).
 - iv. There has been Leylandia management since the Tree Survey was carried out in 2019. This lopping/management took place in the summer of 2020 and is not represented in the documentation.

Access

- The original Grangebrook Deeds and sale documentation (page 10) state that Palmyra may have subsequent access to Grangebrook for maintenance for up to a period of 21 years from the date of the documentation, which was 5th March 1997. This time period has passed.

Overdevelopment

- It has been stated in Deeds relating to the land now referred to Glibury and Palmyra that up to 12 houses could be developed relevant to the size of the land. However, Between Glibury and the proposed additional houses, this amounts to approximately 20 houses.

Bats

- A completed Bat Survey is needed, as bat activity has been observed this summer, 2021.
- There are a number of old sheds/out buildings on the site. An Ecological survey was done in 2019. However, please advise what time of year the survey was completed, as this has an impact on whether bats were seen or not. A Derogation licence is required to complete a survey as the animals may be disturbed. Please provide a copy of this licence showing the date and licence reference number, together with a copy of the survey and details of the individual/company who completed same.

Otters

- The Whitechurch/Glin river has a huge otter presence as per the River Review carried out in recent years in conjunction with South Dublin County Council. Was any survey completed to show any impact on the otter population.

Birds

- The Whitechurch/Glin river has a large habitat of Herons and other birds along river. Please confirm if any survey was carried out in relation to the potential impact on the bird population and environment.

Deer

- Deer regularly visit the green spaces within the estate, using the river for access. Please confirm if any survey was carried out in relation to the potential impact on the deer population and environment.

Wildlife Surveys

- Please confirm that all wildlife surveys have been carried out to show scientific certainty that referenced species are not in the area. Please provide a copy of all relevant surveys together with details of when it/they were completed and the name of the individual or company who completed same.

Archaeology

- The archaeological significance of the site has been evaluated through a fragmented lens. The group archaeological significance has not been fully established.
- We can see no reference to a LIDAR report, which needs to be provided.
- The Rathfarnham Historical Society has advised that Palmyra contains important remnants and the footprint of a Cistercian Monastery from which Whitechurch got its name.

This development would have a negative effect on the estate, the local residents, the local environment, wildlife and our archaeological heritage. It is a piece-meal parasitic development and should not be granted planning for all the reasons outlined in this letter.

Kind regards

Hazel Ennis

Appendix 1

Browser tabs: Fwd. Dev. Plan Subm, My Drive - Google, Grangebrook Subm, View Application S, Property Registrat, landdirectie

URL: https://www.landdirectie/pramap/

Map Labels: Gbally, Grangebrook Avenue, Planes 11.1, 11.2

Property Details:

- Back
- Folio Number: DN214610F
- Title Level: Freehold
- Plan Number: DDx1W
- Property Number: 1
- Area of selected plans: 1.03 hectares.
- Number of Plans on this folio: 1
- Address: Palmyra, Whitechurch Road, Rathfarnham, Dublin 16, D16 A3C7
- Buttons: Add to Basket, Create Alert

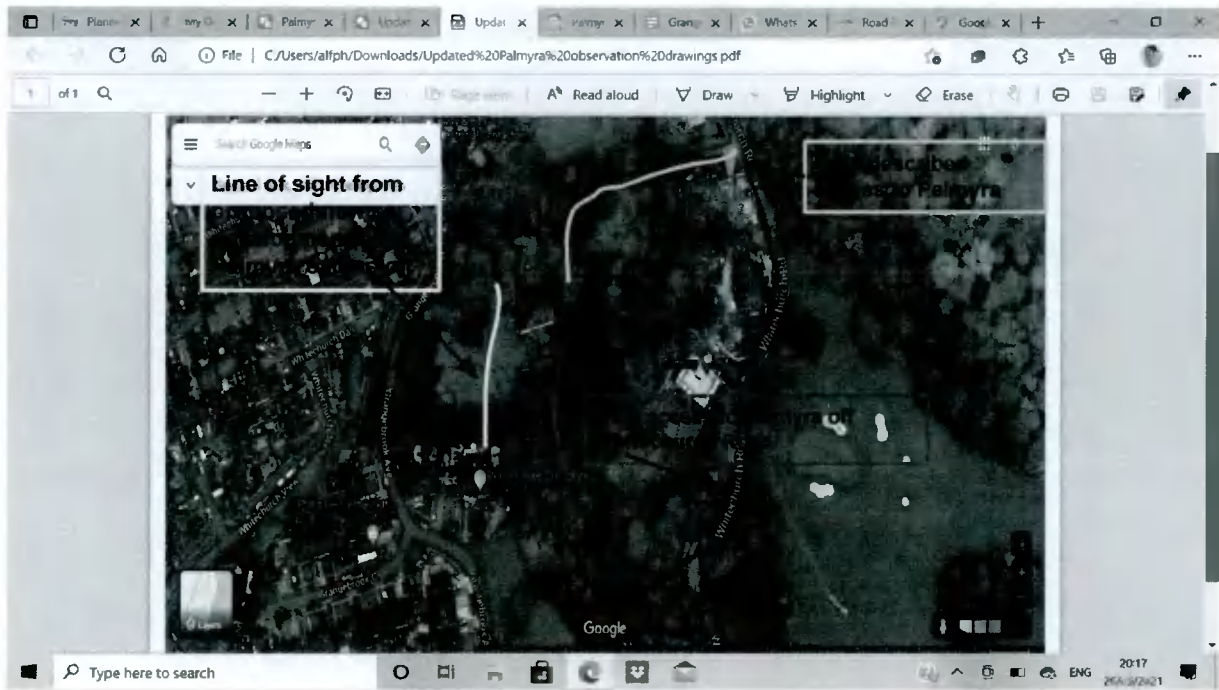
Warning: *PRA Boundaries and Plan Area are not conclusive. See Section 62(2) of Registration of Title Act 2006 and Rule 8(3) of the Land Registration Rules 2014.

Map Info:

- XY: 714417, 726434
- Scale: 1 : 1000
- Townland: Whitechurch
- Barony: Rathdown
- County: Dublin

Taskbar: Type here to search, ENG, 22/09/2021

Appendix 2



Appendix 3



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**

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

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

**Hazel Ennis
60, Grangebrook Avenue
Rathfarnham
Dublin 16**

Date: 07-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.