

5, Grangebrook Close,
Rathfarnham,
Dublin 16,
D16C8Y2.

3rd October 2021
Ph: 087 7838038

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.: T4/0/686637

To whom it may concern,

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

1. The main house of Palmyra has a functioning MAIN driveway further along the Whitechurch Road, to the south, on the western side of the Whitechurch road, which is regularly used - visible on www.landdirect.ie . This driveway is functional for access to the site for development in this application, negating the need for access through Grangebrook estate. The northern lane which runs parallel to graveyard, is proposed to be unsuitable for construction traffic due to historical monuments. However, the main access does not run past the historical monuments and thus is suitable for construction traffic. Also see Appendices 1, 2 and 3 for evidence.
2. Palmyra plan to develop their existing private dwelling, application no.SD21B/0372 - if the 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? We request that SDCC confirm the construction traffic relating to SD21B/0372 is not through Grangebrook estate.

3. Development of Palmyra, application no. SD21B/0372 includes a 2 storey flat-roofed rear extension. This was allowed subject to the fact that it would not be visible from the road. However, given the removal of trees for the proposed new development application SD21A/0246, this lack of visibility may not be the case. Many houses in Grangebrook may now be able to see the new extension of Palmyra due to the new proposed development SD21A/0246. Has there been an assessment of the suitability or impact of the extension to Palmyra, given that planning was approved on the assumption that the boundary with Grangebrook Avenue is as it is currently?
4. Development of Palmyra application no. SD21B/0372 includes the site that is now in application SD21A/0246. Given that the extension of Palmyra in SD21B/0372 was subject to the old sheds to the north of the property being demolished, which has subsequently been subject to a bat survey, can the development be granted/proceed given the site boundaries in SD21A/0246 seem to be within the area of the sheds, which are still subject to investigation/further information?
5. What is stated in the Deeds of Palmyra regarding their official boundaries? - see Appendix 1. On www.landdirect.ie, it appears the boundaries extend to the wall that has been built between Palmyra and Grangebrook, not beyond it. However, the proposed development appears to include green space, including many mature Lime trees, along the ascending Grangebrook Avenue, which is not within the boundaries of Palmyra. Application SD21A/0246 includes a Site Location Map - in these drawings, it includes grass verge/path outside of boundary walls/land ownership, but this is council land - was this agreed to be handed over at pre-planning?
6. There has been no attempt to consult with residents of Grangebrook or its Residents Association regarding the proposed development SD21A/0246 and therefore no formation of any relationship with Grangebrook residents.
7. The Conservation Assessment 11.0.3 and 12.0.3 both state "the site layout and individual houses have been designed to respect both Palmyra and Whitechurch Church". However, there has been no consideration given to 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, during construction and going forward.
8. There is no Traffic Impact Statement included in the application - we have huge concerns regarding the safety of construction traffic blocking access/egress for
 - a. residents at top of Grangebrook,
 - b. emergency vehicles,
 - c. waste management,
 - d. development works on other private homes within the estate etc.

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 ". 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, thus causing a massive safety concern.

There is existing concern about safety of traffic and pedestrians at the corners at the bottom of Grangebrook Avenue (see Appendix 6) and at 48 Grangebrook Avenue. Complaints/concerns have already been made to South Dublin County Council by residents. No action has been taken by South Dublin County Council and the situation has not changed.

9. 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. See Appendix 4 and 5.
10. The original deeds for Grangebrook houses state "the free passage and running to and from the Sold Land of the Services through the utilities which now or may be at any time within 21 years from the date hereof be in....". This document is dated 05/03/97. This document and its subsequent information is out of date and obsolete.
11. There is over-development of the proposed site in terms of the number of houses in the site. South Dublin County Council Development Plan 2016-2022 H3 SLO1 states 12 houses per hectare for low density housing, which for this development site size of 0.226 hectares, would equate to less than 3 houses for the proposed site.
12. The proposed development of Palmyra main house SD21B/0372 requested further information regarding the application, which included the request for a bat roost and survey. We note in this proposed development SD21A/0246, that it is stated that a bat survey was completed, but the survey was not provided with the online documentation, so it is not clear what time of year the survey was done and by whom. We require the derogation licence and the associated report from the said bat surveyor. Bat activity has been personally observed this summer at dusk. We are aware that there are several old sheds etc on site, which would serve as roost sites. The time of year for the bat survey is important, as this has an impact on whether bats were seen, due to the hibernating nature of this animal.
13. The above point also applies to otter activity. The Whitechurch river has huge otter presence as per the river review carried out in recent years in conjunction with South

Dublin County Council. With this in mind, and knowing that otters have a 5km range from their dens, please confirm that all wildlife surveys have been carried out to show with scientific certainty that reference species are not in the area - who carried out this report, time of year etc? Applicable also to kingfishers, herons and other important wildlife.

14. The Arboricultural report 6.8 states "the proposed site access and compound area have not yet been designed" yet within other documentation, it states the site compound will not be within the current site boundaries. This is a large inconsistency within documentation.
15. No construction management survey has been provided. Please provide same.
16. Certificate of confirmation letter TIC/4965/2019 referred to in documentation - what and where is this? Please provide this.
17. Pre-planning consultation documentation PP013/20 not supplied in online documentation associated with the application SD21A/0246. Only an outline - full pre-planning consultation documents needed for review.
18. 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 - same needs to be provided. The Rathfarnham Historical Society has advised that Palmyra contains the important remnants and footprint of a Cistercian Monastery from which Whitechurch got its name.
19. No additional green space has been mentioned in any of the reports to be provided to the additional houses.
20. The design of the proposed houses in application SD21A/0246 are not in keeping with current Grangebrook houses.
 - Planning and design statement, 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 is also mentioned in Site Analysis, Neighbourhood/Local Context. However, this is not the case - proposed houses do not look like current Grangebrook houses. CGM views as contained in the planning application do not show similarity to existing Grangebrook houses.
 - In the Planning and Design statement, Residential Amenity section, it states "design mitigation measures as previously referred, avoiding direct overlooking at 1st floor level have been employed". This only applies to Palmyra and NO reference has been made to existing houses within Grangebrook in any report, specifically numbers 33-45 Grangebrook Avenue.

- In the Planning and Design statement, Standards of Accommodation section, it states "to avoid direct overlooking of the property to the rear (Palmyra), the only windows located in the rear 1st floor elevation of houses no. 1 and 2, comprised 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.

21. Trees:

- It is proposed to remove 63 trees/groups of trees for the proposed development. This leaves **1.5%** of trees in the site proposed to be developed. This is contrary to the South Dublin County Council Tree Management Policy "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 Avenue without damage?? Trees will have to be pruned significantly to access each individual house site, and so this will add to the removal of vast amounts of canopy within the site, and thus will further 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". Retention of trees will not be a priority over construction, 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.
- The 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 an important source of diverse ecology. It also removes a significant number of trees from the immediate environs of Grangebrook, and what creates the character and atmosphere of the estate - it is wasteful to remove what is beautiful, essential to wildlife and creates the essence and 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 throughout the year is due to the current number of mature trees within the estate and its surroundings 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 subsequently risk 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 proposed new development, application no.: 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 tree survey done in 2019 - this lopping/management in summer 2020 is not represented in the documentation.

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

We, the residents of 5, Grangebrook Close, take great pride in our estate and local area and we hope that our observations will be given due consideration prior to Planning Authorities making a final decision on this application.

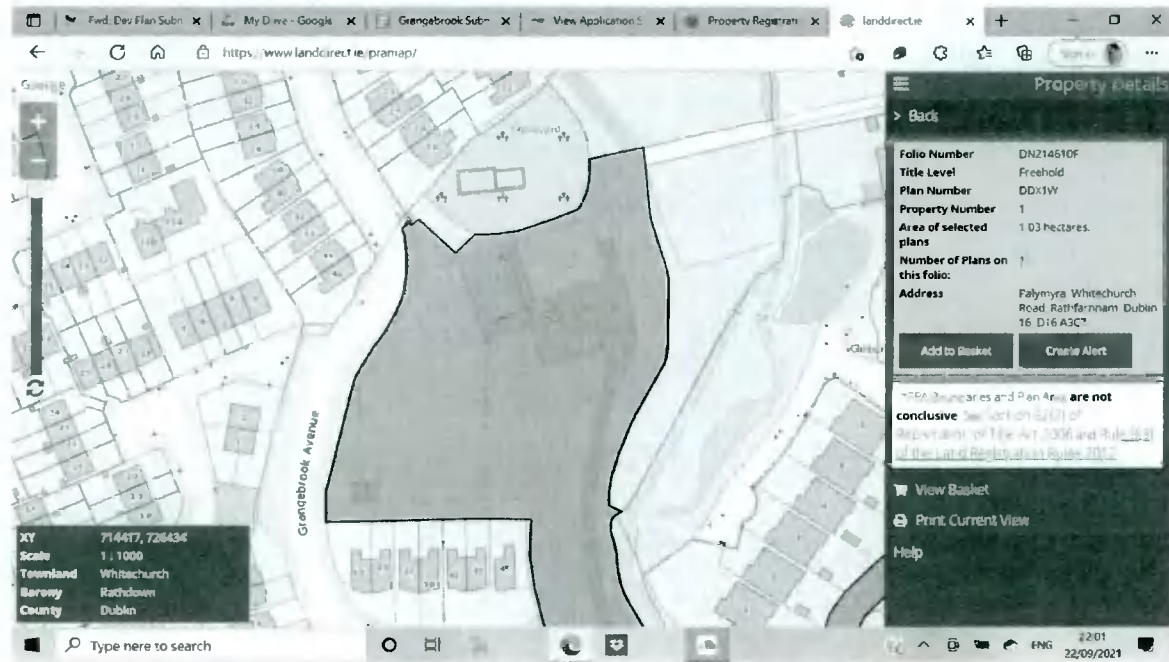
Should further clarification be required, please do not hesitate to contact us directly.

Yours sincerely,

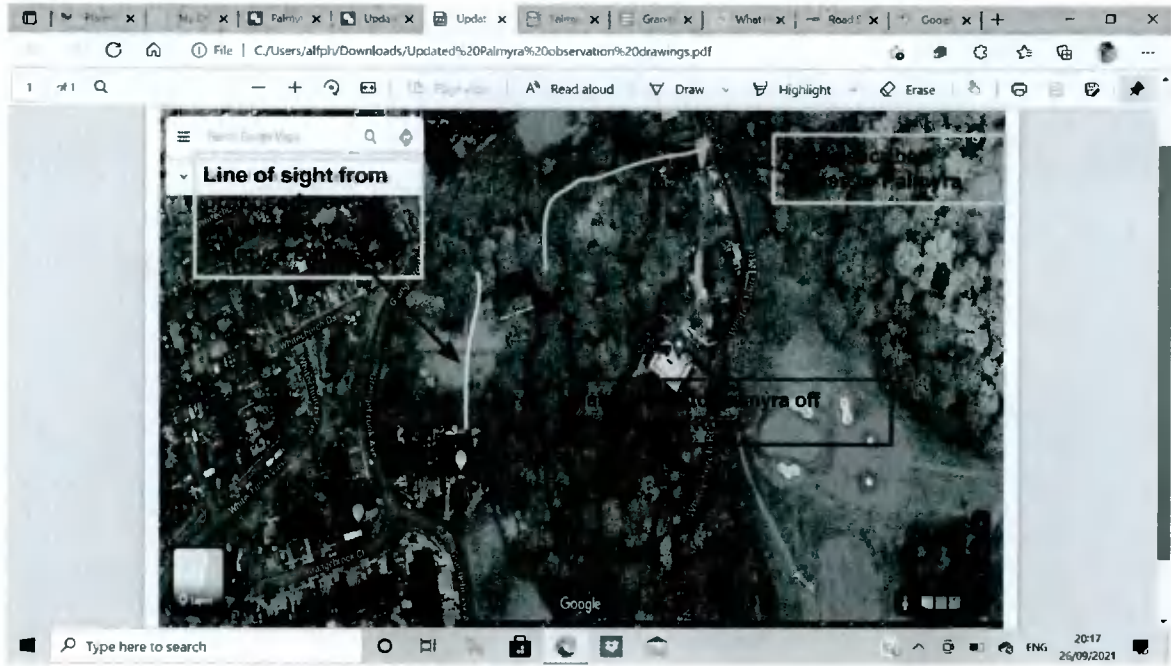
Aoibheann Leeney

Jeff Fitzsimons

Appendix 1 - www.landdirect.ie Palmyra



Appendix 2 - satellite view of Palmyra access



Appendix 3 - Main gateway to access Palmyra, along Whitechurch Road to the south



Appendix 4 - waste management truck egressing estate



Appendix 5 - traffic build up behind waste management truck



Appendix 6 - 90 degree corner at bottom of Grangebrook Avenue - blind corner



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

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

**Aoibheann Leeney & Jeff Fitzsimons
5, Grangebrook Close
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.

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**