

5th October 2021

44 Grangebrook Avenue

Rathfarnham

Dublin 16

Planning Department

South Dublin County Council

County Hall Tallaght

Dublin 24

Ref: SD21A/0246

Cash Office Receipt Number: T4/0/687188

To Whom it May Concern

We wish to submit the following observations on the planning application reference SD21A/0246.
We wish to object to the proposed development.

This planning objection is contrary to the following:

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

We also have the following to note:

Concern over Traffic Management / Health and Safety Risks

A number of complaints have been made to SDCC by residents about the current traffic management problems in Grangebrook, particularly at the bottom of the Avenue and on the corner outside No. 48. There are two very dangerous bends here which pose a significant health and safety risk. This is further impacted by the large volume of cars that are required to park on the road. Currently a traffic management assessment is needed with the volume of traffic. Bringing additional traffic into the estate only increases the health and safety risk. The traffic management measures detailed in the urban design manual material do not consider the very real risks to residents in

Grangebrook during any construction. The urban design manual refers to traffic mitigation measures, but they do not reflect the reality of the situation.

Arboreal Impact

The removal of a significant number of trees will take away from the character of this section of the estate. As residents we have concerns about the following aspects:

- o Disturbance of large numbers of birds of varying breeds roost in the canopies - see ecological survey
 - o Replacement of existing **ESTABLISHED** trees removes multiple habitats
 - o How will construction access each site in-between trees on Avenue without damage?
 - o 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. Leylandia Management since tree survey done in 2019 - further management since (lopping/management in summer 2020 not represented)
 - iii. Why remove native species of tree, naturally grown and replace with new trees
 - iv. Tree line at back of houses - "minimising impact of existing vegetation" - just leave existing vegetation instead of removing it all
 - v. Arboriculture 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"
 - vi. Arboriculture Report - 6.3 - how can character of the Avenue be maintained by removing 95% of trees?
 - vii. Arboriculture Report - 6.4 - not appropriate - we don't want trees removed from GB and replaced ELSEWHERE. GB is a self-contained estate - pointless removing what looks beautiful, useful to wildlife and adds to character of GB Avenue and re-plant trees etc elsewhere
 - viii. Arboriculture Report - 6.6 - T749-T758 Located OFF SITE. Written permission needed to prune these trees. How much pruning?
 - ix. Arboriculture Report - 6.9 - how is there no need for special construction if trees are to be protected?
 - x. AR - 6.12 - Lime tree's roots vulnerable to damage with construction of footpath/excavation works
 - xi. AR - 6.13 - reducing canopy/replacing trees - how is this going to maintain the character of GB Avenue
 - xii. AR - 7.2 - "positive visual impact on proposed development" - but it's taking away from the character by removing all the existing large trees
 - xiii. AR - 8.9 - taking out natural selection of diverse trees already
 - xiv. Large amounts of trees and hedging provide a HUGE amount of ecological value

- xv. In planning application Ref: SD19A/0105 on 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 here.
- xvi. Arboriculture Report - Local Planning policy 4.2 Living with Trees - Tree Management Policy: states 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 represented in any documentation provided by developers.
- xvii. How is it that this development could be considered when it is dependent on every tree bar 1 on Palmyras land is being removed?

Further environmental concerns:

- Bats were observed in summer 2021 around the old sheds on the site, therefore a bat survey needs to be carried out similar to request made from council in relation to SD21B/0372.
- Please confirm that all wildlife surveys have been carried out to show scientific certainty that reference species are not in the area. Please give details of who carried out the report and when.
- Whitechurch/ Gin river has huge Otter presence as per river review carried out in recent years in conjunction with SDCC.
- Habitat of Herons and other birds along the river
- Deer regularly visit green spaces using the river for access.

Design Integration

- SDCC Development Plan 2016-2022 states only 12 houses per hectare can be built, however 8 houses are proposed in a development of 0.226 ha.
- No additional green space has been mentioned in any of the reports to be provided to the additional houses.
- The proposed design of the new houses is not in keeping with the current houses in Grangebrook.

It is our belief that the proposed development does not constitute a proper or sustainable development at this location, and we urge you to refuse planning permission.

Yours sincerely

Michelle & Aidan Dooley

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

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

**Michelle & Aidan Dooley
44, Grangebrook Avenue
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**