

**Anne Marie Sheridan BSc. (Surv), MRUP,
Planning Consultant**

38 Ormond Road,
Rathmines,
D06N1F7.

6.10.2021

The Director of Services,
Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
D24 A3XC.

Re: Planning Application Ref: - SD21A/0246 – Planning permission sought for 8 x 2 storey houses on site at Palmyra, Whitechurch Road, with vehicular and pedestrian access from Grangebrook Avenue, Rathfarnham.

Dear Sir/Madam,

On behalf of my clients, The Grangebrook Resident's Association, c/o of No. 5, Grangebrook Avenue, Rathfarnham, Dublin 16, I wish to make a submission in relation to the above development proposal. The submission is accompanied by a receipt for the required fee of €20.00 (Receipt No. T4/0/686630). A list of local resident's signatures is also attached.

1.0 Introduction

My clients are the residents group representing the Grangebrook housing estate, a 1997 housing development comprising 137 houses. The houses in the estate are two storeys in height, and include a mix of terraced, semi-detached and detached types. The predominant external finish for the front façade of these houses is red brick.

My clients have a number of serious objections to the proposed development, including inter alia, the unsafe nature of the proposed access to the development through Grangebrook Avenue, the loss of trees from the site and adjoining area, and the incompatibility of the proposed design of the houses with those in the Grangebrook estate, each of which would detract seriously from the amenities and character of Grangebrook Avenue, contrary to the residential planning policies of South County Dublin Development Plan (2016-2022), and to the proper planning and development of the area.

The detailed grounds for objection to the proposal are set out in Par.2 below:

2.0 Planning Context

The current South Dublin Development Plan (2016-2022) is the primary planning reference in terms of relevant planning policy in respect of the proposal. There are a number of policies and objectives relevant to the proposed development, including those related to zoning, residential development, heritage and biodiversity. The relevant policies are referred to throughout this submission, as appropriate.

1. Zoning

The area of the proposed development is covered by the RES zoning objective: 'To protect and/or improve residential amenity'.

2. Heritage/Conservation

The proposed development is located in close proximity to the Whitechurch Church and Graveyard which is a Recorded National Monument (DU022-030), and a Protected Structure (334) in the current Development Plan. This denotes a particular sensitivity to the proposed development from a heritage viewpoint and requires the submission of an appropriate level of detail in relation to the relationship between the development and the Recorded Monument in order to assess the full implications of the proposal for the Monument. This issue is dealt with further in Par 3.00 below.

3.00 Objections to Proposed Development

3.1 Unsuitability of Grangebrook Avenue for Increased Vehicular Traffic

The proposal provides for an infill development of eight houses, on a site which forms part of the grounds of Palmyra, a mid-20th century house and grounds with established access from Whitechurch Road. The proposed access to the development is located on Grangebrook Avenue, to the west of the Palmyra lands.

There is a long history of access and safety issues on Grangebrook Avenue arising from a combination of the following characteristics;

1) Length, Winding Form and Number of Houses Served by Grangebrook Avenue

Grangebrook Avenue is the main access road in the Grangebrook estate, running north-south from the entrance road at Grangebrook Park to a cul-de-sac at the southern end of the estate.

The road is c.0.5 km in length and incorporates a number of winding sections and tight bends, including along the frontage to the subject site, and further south at the junctions with Grangebrook Close and the terminating cul-de-sac.

The road provides an access to c.120 houses (including those on Grangebrook Close).

2) Reduced width of the carriageway owing to on-street parking

The width of the carriageway on Grangebrook Avenue is c.7m. However, the operational width of the carriageway is reduced for significant stretches of the road to c.3m in width owing to extensive on-street car parking on both sides of the road. The use of the road for car parking arises from the original design of the estate which provided for only one off-street car parking space per house unit. (See Photos 1, 2 and 3 in Appendix)

The combination of the above characteristics makes Grangebrook Avenue a tortuous and unsafe road for vehicles and their drivers and gives rise to on-going problems for the safe and efficient movement of traffic using the road, with regular incidents of congestion and damage to parked vehicles being experienced by residents. The reduced width of the road is particularly challenging for larger vehicles including larger vans, lorries and emergency vehicles.

The proposed development will increase the number of cars and traffic movements on Grangebrook Avenue, and it is considered that the generation of additional traffic on Grangebrook Avenue will exacerbate the existing problems related to the inefficient and unsafe movement of traffic being experienced by local residents and road users and will detract further from the residential amenities of the area.

It is important to note that the existing lane access off Whitechurch Road is not the only established access to the Palmyra property; there is another access to that property located to the south of the laneway on Whitechurch Road, (see Photo 5 in Appendix), which is capable of facilitating independent access to the site within the grounds of Palmyra off the Whitechurch Road. The applicants have made no mention of this alternative access in the details submitted with the application. It is considered that this access could more reasonably and more safely accommodate access to the proposed development.

Grangebrook Avenue, by reason of its length, form, reduced width and extent of traffic using it, is not capable of safely accommodating the further traffic associated with the proposal. The proposal will generate an unacceptable level of additional traffic in the Grangebrook estate, and will greatly exacerbate traffic movement and safety issues currently being experienced in the Grangebrook estate.

In addition, the accesses to the proposed houses, by reason of their location on an acute bend, at a point on Grangebrook Avenue with a steep gradient in a southerly direction, do not have adequate sight lines to ensure the safety of associated traffic movements accessing and egressing the sites, and that of passing traffic on Grangebrook Avenue.

As such the proposed development would endanger public safety by reason of traffic hazard and obstruction of road users and would detract seriously from the residential amenities of the area, contrary to the residential zoning objective for the area.

2.2 Extensive Loss of Trees - Damage to Visual Amenities of Grangebrook Avenue and to Palmyra and Biodiversity in the Area

The site of the proposed development forms a substantial part of the large gardens of Palmyra, a private 2 storey house dating from c.1825, with access from Whitechurch Road to the east of the subject site. The site contains a large number of semi-mature and mature trees which are significant features of the local landscape and make an important contribution to the visual and environmental amenities of the Grangebrook estate, the Palmyra property and to the area in the general.

In the case of the Grangebrook estate, the trees on the Palmyra site border the eastern side of the mid-section of Grangebrook Avenue, and provide an attractive visual link between the lower and upper sections of the estate, and are an important feature of the estate's character. This feature of the estate is complemented by a row of Lime trees planted on either side of Grangebrook Avenue to the west of the development site. (See Photo 4. in Appendix)

In the case of Palmyra, the trees on the subject site are a significant part of the landscape setting and contribute to the amenities of the house and its garden.

For the local area the trees provide a valuable green lung which makes an important contribution to the environmental quality and biodiversity of the area.

The proposed development will necessitate the removal of the majority of the trees on the site (c. 64 trees). The Grangebrook residents have serious concerns about the proposed removal of the trees from the subject site for the following reasons;

1) Damage to Character of Grangebrook Estate

The removal of the trees from this link section of Grangebrook Avenue will detract from the appearance and character of the estate and will represent a serious diminution in the amenities of the estate, and would be contrary to the RES zoning objective of the area which seeks 'To protect and/or improve to residential amenity'.

2) Damage to Character of Palmyra

The residents of Grangebrook consider that the removal of the trees from the Palmyra garden will detract from the landscape setting of this attractive mid-19th century property, and will therefore detract from the visual and architectural amenities of the property.

This aspect of the proposal is contrary to the Planning Authority's stated policy in relation the preservation of houses that date from the late 19th century and early to mid-20th century which contribute to the historic character and visual setting of a place, as set out in Section 9.1.4 of the Plan. HCL5 Objective 2 of that section in particular is considered to be relevant to the case in point: *To ensure that the redevelopment of older buildings, including extensions and renovation works do not compromise or erode the architectural interest, character or visual setting of such*

buildings including surrounding housing estates or streetscapes. It is considered that the proposal would erode the visual setting of Palmyra.

NB. It should be noted that the details submitted with the application do not include any illustrations of the eastern boundary of the subject site before and after the proposed development. These details should be requested by the Planning Authority by way of additional information.

3) Damage to Biodiversity of Area

The site of the proposed development, together with the remainder of the lands at Palmyra, constitutes a significant 'green lung' for the area, and natural habitat for wildlife in the area.

The details in the Ecological Report submitted with the proposal indicate that the site provides habitats for 30 species of breeding birds, and references other wildlife including, otter, bat, deer and fox .

The proposal will result in a significant reduction in the green/natural infrastructure of the area and will pose a threat to the safety of the established wildlife habitats, particularly of birds. It is noted that despite the fact that damage to birdlife habitats is specifically listed as a potential outcome of the proposal in the ecological report submitted with the application, there are no mitigation measures proposed in the report to ameliorate the potential impacts of the proposed development on the bird habitats.

The proposal to remove c.0.2ha of landscaped garden, including c.64 trees from the area, will detract seriously from the green infrastructure in the area and would result in the loss of local wildlife habitats to the detriment of the biodiversity of the area. As such, it would be contrary to the stated policy of the Planning Authority in this regard, and in particular to the following policies and objectives of the current Development Plan (2016-2022):

1. Section 8.5.0 - Green Infrastructure within Urban Areas

It is the policy of the Council to support the protection and enhancement of Green Infrastructure in all new development in urban areas, to strengthen Green Infrastructure linkage across the wider urban network and to achieve the highest standards of living and working environments.

2. G6 Objective 1: To protect and enhance existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design process.

3. Section 11.5.5 specifically relates to development implementation.

All development proposals should seek to enhance biodiversity and avoid or minimise loss of existing local habitats and wildlife corridors.

4) Specific Concerns Regarding Protection of Existing Lime Trees on Grangebrook Avenue

The row of Lime trees along Grangebrook Avenue to the west of the development site are an important landscape feature in the Grangebrook estate, and are valued highly by the residents as part of the amenities of the estate.

It is clear from the Arboriculture Report submitted with the application that the retention of these trees will be seriously threatened by the proposal. This would result in a serious loss of amenity to the area and would not be consistent with the residential zoning objective for the area, and as such would be contrary to the proper planning and development of the area.

2.3 Design not in Keeping with Grangebrook Estate

1) Existing House Types/Established Urban Design Context

The predominant house type in the vicinity of the subject site on Grangebrook Avenue is a two storey semi-detached structure of c. 100sq.m with a hipped roof. The established height and width of the houses is c.8m. and c.5m respectively. The external finish to the front façade is red brick; there is a canopy running the full width of the front elevation at ground level which incorporates a pediment above the entrance.

The predominance of one house type, repeated along both sides of the entire length of Grangebrook Avenue, creates a visually distinctive and unified streetscape in the vicinity of the proposed development, and provides the architectural and urban design context for the proposed development.

2) Proposed House Types/Not Consistent or Complementary to Established Built Form

There are three different house types included in the proposed eight house scheme - a semi-detached (Type A1(4)) and two detached (Type B1(1) and B2(1)). The external finish for each house type is a combination of smooth render and light coloured brick.

House Type A1 is c.148sq.m in area, and c.9.48m and 6.9m in height and width respectively, with a hipped roof. House Type B1 is c.122sq.m in area, and c.8.13m and 11m in height and width respectively. House Type B2 is c.143sq.m in area, and c.8.13m and 11.6m in height and width respectively. Both House Types B1 a B2 have full pitched roofs.

The drawings submitted with the proposal show the proposed houses in the context of the existing houses in Grangebrook Avenue. It is clear that the proposed houses by reason of their varying sizes, heights, widths, external finish and roof types, are distinctly different in character to the houses in the Grangebrook estate, and particularly those on Grangebrook Avenue.

Policy 11.3.2 of The South Dublin Development Plan requires that in developments of 'approximately 0.5 hectares or less a degree of architectural integration with the surrounding built form will be

required, through density, features such as roof forms, fenestration patterns and materials and finishes'.

It is clear from the details submitted with the application that the proposed houses will not be successfully integrated into the established built form in the immediate area. The proposal will therefore detract from the visual cohesion and amenities of the Grangebrook estate, contrary to the stated policy of South Dublin County Council in this regard.

2.4 Proximity of Development to Recorded Monument

The proposed development, and the northern portion in particular (Site of proposed Houses 1 and 2), is in close proximity to the Whitechurch Church and Graveyard which is a Recorded National Monument (DU022-030), and a Protected Structure(334) in the current Development Plan.

The proposal, and House Nos. 1 and 2 in particular, present a real threat to the integrity of the archaeological remains in the area. The details submitted with the planning application does not provide adequate detail in relation to the relationship between the northern section of the site and the adjoining graveyard; a number of cross sections through the adjoining sites should have been included in the application to illustrate the precise nature of the relationship between the proposed development (and House No 1 and 2 in particular) and the Protected Monument.

The Archaeological Assessment submitted with the application recommends that, given the proximity of the northern section of the site to the graveyard associated with Whitechurch Church, that archaeological monitoring of the excavation groundworks associated with the proposed development should be required. However, given the absence of critical information in respect of the relationship between the proposed development and the graveyard included in the planning application, the application remains inadequate. Further information in this regard is required to enable a comprehensive assessment of this aspect of the proposal.

2.5 Issues with Sewage Infrastructure in Grangebrook Estate

The Grangebrook estate has experienced incidences of sewage overflow after heavy rain, from the main sewer which runs through the Grangebrook estate. South Dublin County Council have been alerted to this problem and on at least one occasion the Drainage Department was required to pump raw sewage from Grangebrook Green. It is clear that there is an issue with the sewage system in the area.

The proposal will increase the load on the established sewage system in the area, and will exacerbate the problems already being experienced with foul drainage in the area. As such, the proposal would not be consistent with the proper planning and development of the area.

3.0 Absence of Consultation with Residents

The residents of Grangebrook were aggrieved that, given that the applicants are proposing to develop within the Grangebrook estate, no attempts to contact the resident group was made by, or on behalf of applicant during the course of the preparation of the application. In the event that such a courtesy had been afforded to them, they would have welcomed the opportunity to discuss the proposal in order to obviate or ameliorate the issues of concern to them.

4.0 Conclusion

The Grangebrook Resident's Association, have a number of serious objections to the proposed development, as detailed above, and request that the proposal be refused planning permission for the following reasons:

1. The proposed development would give rise to an increase in traffic on Grangebrook Avenue, which owing to its limited width, alignment and extent of use, already experiences significant issues in relation to traffic congestion and traffic safety, and is not capable of facilitating further vehicular movements. (The location of an access to the development off Whitechurch Road, e.g. the established access to Palmyra located to the south of the laneway on Whitechurch Road, (see Photo 5 in Appendix), would facilitate a safer and more efficient access to the site through the Palmyra property than that currently proposed.)

In addition, the accesses to the proposed houses, by reason of their location on an acute bend, at a point on Grangebrook Avenue with a steep gradient in a southerly direction, do not have adequate sight lines to ensure the safety of associated traffic movements accessing and egressing the sites, and that of passing traffic on Grangebrook Avenue.

As such the proposed development would endanger public safety by reason of traffic hazard and obstruction of road users and would detract seriously from the residential amenities of the area, contrary to the residential zoning objective for the area.

2. The proposed development would result in the extensive removal of trees which form part of the amenities and character of the Grangebrook estate and of the Palmyra property, and are an important component of the area's biodiversity. The proposal would therefore detract from the amenities and character of the Grangebrook estate and of the Palmyra property, and would seriously deplete the biodiversity infrastructure in the area. As such the proposal would be contrary to the residential zoning objective for the area, and to the stated policies of the planning authority in respect of heritage and biodiversity protection in the current Development Plan.
3. The design of the proposal, by reason of the size, height, width and external finish of the proposed houses, is not complementary to the established built form in the Grangebrook estate. This is contrary to the stated policy of the Planning Authority in respect of infill developments as set out in Policy 11.3.2 of the current Development Plan (20016-2022), and is contrary to the residential zoning objective to protect the residential amenities of the area.
4. Owing to the proximity of the proposal to the graveyard attached to Whitechurch Church and Graveyard which is a Recorded National Monument (DU022-030), and a Protected Structure (334) in the current Development Plan, and to the absence of adequate information in respect of the relationship between the proposed houses and that graveyard, the proposal does not make adequate provision for the protection of the monument and would be contrary to the objectives in respect of Heritage and Protected Structures as set out in the current Development Plan.
5. The proposal will increase the load on the established sewage system in the area and will to exacerbate the problems already being experienced in the area in this regard. As such, the proposal would not be consistent with the proper planning and development of the area.

Yours sincerely,

Anne Marie Sheridan

On Behalf of the Grangebrook Residents Association

Appendix – Photographs



Photo 1 – General View of Grangebrook Road Illustrating Existing On-Street Car parking



Photo 2 – Refuse Truck Negotiating Parked Cars on Grangebrook Avenue



Photo 3 – Congestion Caused by Service Vehicles (Refuse Truck)



Photo 4 – View of Western Boundary to Proposed Development on Grangebrook Avenue Showing Lime Trees Lining both sides of Grangebrook Avenue and Palmyra Site Trees in Background



Photo 5 – Established Alternative Access to Palmyra, south of Existing Lane Entrance to Property on Whitechurch Road.

Rosemary Maher	23	Grangebrook Ave	John Maher
KEN MAHER	21	"	John Maher
Laura McElroy	21	"	John Maher
TOM JENNER	19	Grangebrook Close	S. Smith
Frank & Nell	19	Grangebrook Close	Clara McCord
Caroline Bryant	29	Grangebrook Ave	Ed. Smith
Susan McDavid	27	Grangebrook Ave	Ed. Smith
Susan Smith	25	Grangebrook Ave	Ed. Smith
Maureen McEgan	21	Grangebrook Ave	Ed. Smith
Arthur McEgan	5	Grangebrook Ave	Ed. Smith
Ger. Kelly	11	Grangebrook Ave	Ed. Smith
John Bolton	15	Grangebrook Ave	Ed. Smith
Susan McEgan	13	Grangebrook Ave	Ed. Smith
ESTHER McEgan	9	Grangebrook Ave	Ed. Smith
THOMAS DUFFY	7	Grangebrook Ave	Ed. Smith
Diana Duffy	7	Grangebrook Ave	Ed. Smith
Conor Duany	5	Grangebrook Ave	Ed. Smith
Brendan Hogan	3	Grangebrook Ave	Ed. Smith
CATHERINE ROOPE	76	Grangebrook Ave	Ed. Smith
Margaret Crowley	39	Grangebrook Ave	Ed. Smith
Beatrice McEgan	39	Grangebrook Ave	Ed. Smith
Paul Flanagan	51	Grangebrook Ave	Ed. Smith
Maureen McEgan	51	Grangebrook Ave	Ed. Smith
Diana McEgan	19	Grangebrook Ave	Ed. Smith
Shirley McEgan	18	Grangebrook Ave	Ed. Smith
ANNETTE COSTELLO	8	Grangebrook Ave	Ed. Smith
GARY HANNEY	✓	✓	Ed. Smith
ELANOR HANNEY	98	Grangebrook Ave	Ed. Smith
Mary Gallagher	14	Grangebrook Ave	Ed. Smith
Julie Hill	78	Grangebrook Ave	Ed. Smith
Paul Ryan	78	Grangebrook Ave	Ed. Smith
Susan Ryan	81	Grangebrook Ave	Ed. Smith
David Johnson	81	Grangebrook Ave	Ed. Smith

NAME	ADDRESS	SIGNATURE
Susan Leahy	78 Grangebrook Ave	Susan Leahy
Helen Kelly	80 Grangebrook Ave	Helen Kelly
Haley Leahy	82 Grangebrook Ave	Haley Leahy
Maura Walsh	84 Grangebrook Ave	Maura Walsh
Eve Higgins	86 Grangebrook Ave	Eve Higgins
SEAN LANE	88 GRANGEBROOK AVE	SEAN LANE
PAUL MCCORMON	96 GRANGEBROOK AVE	PAUL MCCORMON
Grangebrook	89 Grangebrook Ave	Grangebrook
Andrew Jaworski	85 Grangebrook Ave	Andrew Jaworski
Sinead Berry	100 Grangebrook Ave	Sinead Berry
Christina McSwish	83 Grangebrook Ave	Christina McSwish
Janet Brunick	75 Grangebrook Ave	Janet Brunick
Lisa Hogan	73 Grangebrook Ave	Lisa Hogan
Emer O'Mahony	73 Grangebrook Ave	Emer O'Mahony
Liz Keating	71 Grangebrook Ave	Liz Keating
Liam Kenny	71 Grangebrook Ave	Liam Kenny
Edward O'Connell	57 Grangebrook Ave	Edward O'Connell
Mary McCallis	57 Grangebrook Ave	Mary McCallis
Dan Leahy	55 Grangebrook Ave	DAN LEAHY
Brian Leahy	" "	Brian Leahy
Aine Hayes	53 Grangebrook Ave	Aine Hayes
Adrian Rowe	53 Grangebrook Ave	Adrian Rowe
DECK LANE	49 Grangebrook Ave	DECK LANE
CAIRONE PATRICK	49 GRANGEBROOK AVE	CAIRONE PATRICK
GERT + EMMA O'Donnell	47 GRANGEBROOK AVE	GERT + EMMA O'DONNELL
Elizabeth Flanagan	72 G.B. AVE.	Elizabeth Flanagan
Paula Flanagan	68 Grangebrook Ave	Paula Flanagan
David	68 Grangebrook Ave	David
William Miller	66 Grangebrook Ave	William Miller
Steve Leahy	66 Grangebrook Ave	Steve Leahy
Shane Leahy	11 Grangebrook Close	Shane Leahy
Sarah O'Donnell	62 Grangebrook Ave	Sarah O'Donnell

Michelle Flanagan	" "	Michelle Flanagan
Arthur G... ..	5 Grangebrook Park	Arthur G... ..
Michael G... ..	5 Grangebrook Park	Michael G... ..
Tony Bowler	94 GRANGEBROOK AVE	Tony Bowler
Catherine Power	94 GRANGEBROOK AVE	Catherine Power
Seamus Wall	4 Grangebrook Park	Seamus Wall
James		
Cathie Deane	16 Grangebrook Avenue	Cathie Deane
Kern O'Riordan	87 GRANGEBROOK AVENUE	Kern O'Riordan
Yvonne Healy	11 Grangebrook Vale	Yvonne Healy
JEFF FITZSIMONS	5 GRANGEBROOK CLOSE	JEFF FITZSIMONS

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

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

**Grangebrook Residents Association
38, Ormond Road,
Rathmines,
Dublin 6**

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**