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February 14, 2022
The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1. D01V902
Ireland,

Ref. SHD3ABP-312501-22

Applicant: Tetrarch Residential Ltd.

Location: Mill Road , Saggart /Rathcoole, Co. Dublin.

Development: Demolition of existing single storey dwelling and the construction of 274 units on a 4.62 ha (net) site (density 60 units per hectare). It will comprise of 51 houses, 38 duplex units and 185 apartments. The height of the proposed scheme will range from two storey houses and three storey duplexes to 5 storey and part 8 storey apartment blocks. The proposed residential mix will comprise of: 17 2-bed houses, 27 3-bed houses and 7 4-bed houses, 2 1-bed duplex, 17 2-bed duplex and 19 3-bed duplex units, 62 1-bed apartments, 119 2-bed apartments and 4 3-bed apartments. A 4-classroom crèche of c. 276 sq.m and 2 substations are also included in the proposed development. 276 car parking spaces and 634 bicycle spaces are provided. A planted woodland berm will be developed along the northern boundary with the N7 to provide a sound barrier and amenity open space. There are a number of green spaces located in the centre of the site and on the south east and west of the site with natural play and SUDS elements as well as a large open communal space for the two apartment blocks to the south. Vehicle, pedestrian and cycle access to the site will be from the Mill Road. A new road will be constructed running east west at the southern boundary of the site. The residential element of the site will have two access points off the proposed new road. This new route will extend eastwards to provide cycling and pedestrian connections through neighbouring Citywest lands and to the Saggart LUAS light rail terminus.



Summary

Dear Sir/Madam,

On behalf of the Rathcoole Community Council, which is a local resident's elected body for Rathcoole Town we wish to lodge the following submission in relation to the Strategic Housing Development ref **SHD3ABP-312501-22**

We do not oppose the long-term development of res-n zoned lands in principle and recognize the pressing need to meet the varied housing needs of the growing SDCC community. However we believe that the granting of permission for this particular SHD development would be premature, and that any review of development of these lands should be delayed until the after the 2022-2028 SDCC development plan is approved, and an approved Area Development Plan is put in place for Rathcoole town.

We also believe this application is flawed in that while it is acknowledged that the lands on Mill Road are part of the Rathcoole townlands and the address is Rathcoole, it is not acknowledged in the project justifications that it is part of Rathcoole from a Census , electoral area and parish perspective or expansion of housing justified on the basis of the needs of Rathcoole, now recognized by SDCC as a Self Sustaining town.

This SHD application should also be considered premature on the grounds that the Clients Master Plan proposal submitted as part of the package for the adjacent City West hotel lands , which is an integral part of this development, and associated road infrastructure design, has not gone through the planning process with community consultation phase nor approval of proposed rezoning of the gold course lands.

Regarding infrastructure this SHD application is also premature, in that, because of the Financial Economic Crash in 2010 many of the planned SDCC and Irish Water infrastructure improvements projects to support additional housing in Rathcoole did not take place. Rathcoole has become one of the fastest expanding small towns in Ireland putting strain on our original infrastructure, reducing the quality of life of all its inhabitants. Additional infrastructure must be put in place prior to approval of additional large-scale housing projects such as proposed.

We believe that Rathcoole Town's Development Plan is a special SDCC case from a town planning and regional planning perspective given that Rathcoole town is outside of the Dublin Metropolitan Region. In the current SDCC county development plan (recently revised to align with the National Planning Framework (NPF) 2018 and the Regional Spatial Economic Strategy (RSES) 2019), Rathcoole remains defined as a small rural town of under 5000 population clearly



separated from the Saggart. Its separation is defined by an narrow green belt that consists of SDCC owned lands and the lands of this developer and others. Ad hoc development in this green belt, such as this SHD, would prejudice the future existence of Rathcoole as a distinct historical town entity. We therefore feel that a proper formal Local Area Plan is a prerequisite to this SHD development.

3

Planning Context

Rathcoole Town is an ancient historical town with a single main through street, first established as a fortification of the Pale in Norman times and has for many centuries served a postal town and coaching stop for travellers to the south. A large portion of the main street is zoned VC. Although now bypassed it has retained significant visitor related industry and employment, with a large Avoca retail and restaurant complex, several well-known long-established public houses/restaurants and vehicle repair businesses. The town supports a well-established equine industry in its hinterland and additional local employment is provided by the Greenogue Industrial Estate, and adjacent businesses located in Citywest and Tallaght and Naas Road. From a planning perspective it remains a functioning small town with a large element of local employment, the current development plan recognised this and stated that land- zoned housing development should be development to meet the local population needs. Rathcoole underwent a 27% increase in population in the years 2011 to 2016 to 4315 and is forecast to reach 5703 by the year 2022. Total housing capacity was stated to be 1062 in 2016 census analysis, since 2016 approximately 300 houses have been completed, our secondary school on the Killeel Road and the National school on our main street both have planning approval for expansions. It is in this context we would like to make the following observations in relation to the Tetrarch Residential SHD submission for Mill road which are largely similar to the community observations in relation to a similar large housing development proposal on the Killeel road .



Traffic and Transport Planning Concerns

1. There is inadequate road infrastructure to cater for existing traffic, We believe further housing development on Saggart or Rathcoole lands should not take place until plans for the Dublin Western Orbital Route are finalised.
2. Location of the SHD development is adjacent to existing developments of Millrace, Spring Bank and Avoca retail complex, with main entrance and exit proposed being close to the main N7 Exit Roundabout entrance to both Rathcoole and Saggart . We believe this would significantly exacerbate traffic congestion during peak commute times. We note that a traffic impact study was not included as part of the package.
3. There is a lack of public transport serving Rathcoole. Bus Connect have no plan to increase frequency of the 69 bus services from once per hour from Rathcoole to the city centre and have yet to implement the planned local 242 route to Saggart, leading to more car use.
4. Traffic delays on Mill road ,Main Street Rathcoole and Fitzmaurice Road must be resolved before this new development proceeds and mobility plans should be developed for the secondary school, the two existing primary schools and the planned new primary school to try to minimise the school induced traffic loading on Mill road and Rathcoole main street at peak traffic times.

Air safety concerns

5. The proposed development will take place adjacent to Main runway of Casement Aerodrome and the restricted flight envelope, the proposed housing density and height of the buildings particularly the proposed 8 story building overlooking the runway would cause both safety and security concerns. We note that Dept. of Defence does not appear to have been consulted with the proposal.

Residential Amenity



General

6. The existing schools in Rathcoole are under pressure to cater for existing increased demand and it will be some time before plans for additional school places are realized, confirming again, that further expansion of housing development at this time would be premature.

7. The proposed apartment block at prominent location at front of the development beside established housing on Mill Road is out of context, considering the areas location at edge of small town adjacent to a rural area.

8. The rapid growth of population since 2010 and the inflows of people from outside the local area, will increase further if this SHD Development and the proposed SDCC development proceed. This growth has put enormous strain on the community and its volunteer ethos, trying to integrate such a large number of newcomers into the social, communal, and sporting structures that have made Rathcoole such a desirable place to live in. The rate of change needs to be measured against the small population base of Rathcoole and the finite human resources available to coordinate integration .

Regards

Alan Fairman

Director