



Rathcoole Community Council CLG
Rathcoole Community Centre
Main Street, Rathcoole
Co. Dublin

September 13, 2022

The Planning Dept.
South Dublin County Council
County Hall, Tallaght ,
County Dublin,
Ireland.

REF. SD22A/0342

Applicant: Riverside Projects Limited

Location: Tay lane , Rathcoole, Co. Dublin.

Development:

Construction of a four-storey apartment block (4224 sq.m) consisting of 58 age friendly residential units comprising 20 one bedroom units and 38 two bedroom units with associated private balconies, associated lift and stair cores, entrance lobby, and circulation space; Provision of a community facility (99.3 sq.m) and ancillary accommodation including refuse store (26.9 sq.m), cycle store (36 sq.m), plant room (46.2 sq.m), sub-station (14 sq.m), switch room (16 sq.m), landscaped public open space (907.4 sq.m) and communal open space (1225.6 sq.m), and 30 car parking spaces and 80no. cycle parking spaces to serve the development; Vehicular access to the development will be provided via an upgraded entrance from Tay Lane with a minor pedestrian access provided from Eaton Drive to facilitate direct linkages to the town centre; Planning permission is also sought for all ancillary site and development works above and below ground to facilitate the development including the provision of internal access roads and pedestrian / cycle pathways and linkages, boundary treatment, public lighting, hard and soft landscaping, services, rooftop PV panels and associated signage.



Dear Sir/Madam,

On behalf of the Rathcoole Community Council, which is a local residents elected body for Rathcoole Town, we wish to lodge the following 3rd party observations in relation to the proposed development.

1. Rathcoole Community Council as a matter of policy are supportive of “back land” infill developments that enhance the village centre.
2. We welcome developments that will increase the accommodation options for Rathcoole senior citizens.
3. We welcome the effort that the developer has undertaken to understand the historical significance of this village centre site, the presence of St Bridget’s well which was part of the former Mary Mercer Girls Charter School site , and the requirements of a development in an architectural conservation area.
4. We are supportive of the Cluid housing association and their efforts in relation to improving the housing and accommodation stock in Ireland.
5. However, we strongly believe that no additional multi residential units should be permitted that will increase the peak traffic congestion on Rathcoole Main Street until such time as the recently promised transport and traffic study of our area is completed and a plan of action developed. ABP since June 22 has approved 386 units for the town land of Rathcoole ,SD21A/0087,SD21A0206,and SHD3ABP3/250/22 which when added to the 204 units approved under SHD3ABP30768 and other smaller developments will exceed the total projected development planned for the Rathcoole 2022-2028 horizon.
6. The accompanying design statement documentation does not address how this proposal is compatible with the 2022-2028 development plan for Rathcoole or the requirements for senior housing in Rathcoole based on Rathcoole Census data. Rathcoole now classified as a self-sustaining growth town with a population in excess of 5000 persons, had had rapid expansion in recent years with no expansion of infrastructure or transportation networks and a reduction of small retail and small office units on the Main Street which is incompatible with the vision of the “15 min village” aspired too.
7. We note that the Department of Defence has not been consulted or appropriate aviation impact study submitted with the application. The proposed development is located within the defined locations of Aviation Significance being below the take-off climb surface and approach surface to casement runway 04. High density 4 story accommodation permanent accommodation especially for seniors would be against best practice guidelines for such a location.
8. There is no noise survey submitted with the application to address the significant aviation noise that will result with this development being directly below the take-off climb surface from runway 04 and its location with the defined noise significant boundary for Casement military aerodrome. The recent Defence review report called for the purchase of modern F16 jet aircraft which have a know take off ground impact noise level in excess of 95 DB.
9. While there is a noise survey in relation to the traffic noise from the Adjacent N7, it focuses on the internal noise requirements and mitigation measures to achieve this, but



it ignores the requirement for Seniors to be able to use their balconies during the day as an alternative to a garden space. Some of the corner balconies will be beside and directly overlook the N7.

10. The Upgrade of Tay Lane sewage pumping station is needed to cater for any additional demand. This has been stated repeatedly by Irish Water in submissions to SDCC and has been a primary reason for refusal of other recent development applications, we note that the documentation submitted in this regard stated that it will Q1 2026 before the new pumping station will be built to accommodate additional development in Rathcoole.
11. We note that a non-committal letter from Cluid is attached to the submission however there is no assessment as to whether the proposed development is in conformance with Cluid design guidelines [Cluid Design-Guide 2017_web-1.pdf \(cluid.ie\)](#).
12. While it is stated that the building will be senior friendly it does not say what level of need for assistance formed the basis of the design. It is our understanding that design should be informed by the Universal Design Guidelines for Homes in Ireland, published by the Centre for Excellence in Universal Design for the National Disability Authority <http://universaldesign.ie> and the National Disability Authority's Building for Everyone series. Some of our concerns re this proposal for seniors for us would be the need to insure the two lifts in the design could be kept operational in the event of a power outage or maintenance issue to avoid seniors being marooned in their apartments. Apartment units should have sit down bathing facilities and the lack of a second bedroom with double bed would restrict families visiting elderly relatives. Drawing do not show how apartments can be adapted to disabled requirements should this become necessary as occupants age.
13. The fire risk assessment report does not discuss the specific building and equipment needs of seniors or people with disabilities to achieve a safe and effective exit from the building during emergency evacuation.
14. The mobility report is quite confusing, on the one hand it argues that this facility is similar to a nursing home with a large non-working population to justify the less than one parking space per unit. But then does not mention that there is only one 69 bus per hour during off peak with no plan to increase its frequency, or that the walking distance to the Luas Terminus in Saggart is approx. 40 mins from that location. Expecting elderly and frail seniors to walk that distance in inclement weather is unrealistic, as are comments relating to the long-term options dependent on new road infrastructure. Much is made of the large provision for parking bicycles however Rathcoole's Main Street is highly congested during working hours without cycle lanes, making it hazardous for cycling a provision for storage of 4 wheel electric mobility scooters would be much more sensible.
15. The design statement states the 4 story block building reflects the precedent architectural design established by the adjacent Eaton apartment complex, and that of the Aparthotel that was originally approved for the Mercer Charter school/Glebe site. However we would argue that the SDCC decision to allow the Eaton apartment complex development and approve the Aparthotel development design development, which RCC opposed at the time, degraded significantly the overall low level varied



historical architectural references of the ACA area with the Eaton street front block form modernistic design, and should not be used a precedent for other developments.

16. Access to the development is proposed via Tay Lane, Tay Lane is currently a discrete short Cul de sac with entrances only to Tuath housing association development and the recently constructed St Bridget's women's refuge. Currently the minimal vehicular traffic facilitates external security surveillance. The social and security needs of user of both facilities would need to be considered in any plan to expand vehicular use of this access lane. There is no evidence in the submission that other users of Tay Lane have been consulted.

17. It would be Rathcoole Community Council's view that the design and scale of the development should be revisited to reduce it to a two story structure with additional trees at Northern edge added to improve noise mitigation. It would also be our preference that SDCC work with the developers of both sites to develop an updated master plan for the overall Mercer School/Glebe site, to insure an integrated development for this key historical village centre site, and that the overall site facilitates small retail, medical, community and business activities to insure a vibrant town centre and the Main Street ACA is maintained..

Regards,

Alan Fairman C. Eng.

RATHCOOLE COMMUNITY COUNCIL

Alan Fairman,
Rathcoole Community Centre
Main Street
Rathcoole
D24X039

Date: 13-Sep-2022

Dear Sir/Madam,

Register Ref: SD22A/0342
Development: Construction of a four-storey apartment block (4224 sq.m) consisting of 58 age friendly residential units comprising 20 one bedroom units and 38 two bedroom units with associated private balconies, associated lift and stair cores, entrance lobby, and circulation space; Provision of a community facility (99.3 sq.m) and ancillary accommodation including refuse store (26.9 sq.m), cycle store (36 sq.m), plant room (46.2 sq.m), sub-station (14 sq.m), switch room (16 sq.m), landscaped public open space (907.4 sq.m) and communal open space (1225.6 sq.m), and 30 car parking spaces and 80no. cycle parking spaces to serve the development; Vehicular access to the development will be provided via an upgraded entrance from Tay Lane with a minor pedestrian access provided from Eaton Drive to facilitate direct linkages to the town centre; Planning permission is also sought for all ancillary site and development works above and below ground to facilitate the development including the provision of internal access roads and pedestrian / cycle pathways and linkages, boundary treatment, public lighting, hard and soft landscaping, services, rooftop PV panels and associated signage.

Location: Lands located to the east of Tay Lane, Newcastle Road, Rathcoole, Dublin 24

Applicant: Riverside Projects Limited
Application Type: Permission
Date Rec'd: 23-Aug-2022

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.sdublincoco.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**