



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

September 21, 2022

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

**REF. SD22A/0347**

**Applicant:** Romeville Developments Ltd.

**Location:** East of Stoney Hill Road , Rathcoole, Co. Dublin.

**Development:** Demolition of 1 residential property and 1 ancillary outbuilding. Construction of a residential development of 42 three-bedroom dwellings in a mix of terraced and semi-detached units. The proposed will comprise of 2 typologies: typology F (21 dwellings) and typology L (21 dwellings) both 2 storey with typology F having a 2nd floor loft accommodation with front dormer windows. Total residential gross floorspace is 5622sqm. Development includes 84 in curtilage surface car parking spaces (3281sqm). Public open spaces in an eastern park and a western park (including proposed play equipment), an additional large parkland to the south of the site (11797sqm) comprising the first phase of linear park. Private domestic gardens. landscaping, boundary treatments, drainage and engineering works and all other associated and ancillary development works. A new vehicular, pedestrian and cycle



entrance from Stoney Hill road. An internal road network, including footpaths/cycleways. 3 refuse/bin stores, public lighting,

**Dear Sir/Madam,**

On behalf of the Rathcoole Community Council, which is a resident's elected body for Rathcoole Town, we wish to lodge the following 3<sup>rd</sup> party observations in relation to the proposed development.

1. Rathcoole Community Council support the 2022-2028 SDCC development plan with Rathcoole being classified as a "self-sustaining growth town" where residential development will take place on a phased incremental basis, in line with the needs of the town's community, and the provision of infrastructure to support such development. We therefore in principle support gradual housing development in the designated Res N areas identified in the 2022-2028 development plan and in the Res N designated portion of this planning application.
2. We share the disappointment of the length of time it is taken for the Judicial Review in relation to the previous SHD planning permission for this overall site as stated in Romeville submission. However, we fully support the members of our community who initiated the judicial review as we believe that there were highly significant process flaws that need to be addressed in relation to proper town planning and the environment. It is our understanding that the ongoing judicial review may result in significant changes being required to the overall development of these Res N lands. We therefore believe it is premature to decide if a part-development of the SHD lands as proposed by Romeville should be approved in advance of the Judicial review determinations.
3. We welcome the significant reduction in the density of the development and the revision of house type to suit a transitional area at an edge of town rural interface. However, it is our policy 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.
4. We are extremely concerned with statements included with the submission that indicate that rather than this being a standalone development is but a "phase one" of a greater overall development of the area with no indication by means of an "area plan" as to what the final overall layout will consist of and how this initial development will insure proper optimal development of the overall Res N lands.
5. Romeville state in their submission that there is an urgent need to bring new houses to market, however no analysis of Rathcoole's town population requirements vs existing housing, type of house required based on demographics, etc. are included to justify this assertion. ABP since June 22 has approved 386 units for the townlands of Rathcoole, SD21A/0087, SD21A/0206, and SHD3ABP31250122. All of which will impact on the already chronic peak traffic delays entering and exiting the Main street. None of these were considered as part of the traffic assessment. It is also our view that the level of



housing now proceeding to construction in Rathcoole more than addresses the immediate needs of our area.

6. Irish water in their letter re foul pipework infrastructure that is attached to the Aecom utilities report indicate that the required upgrade to the Tay Lane pumping station will not take place before Q1 2026 and given that any potential available capacity would go toward developments that are already proceeding to construction stage we believe that approval of this revised partial development of the site is premature and unnecessary at this time.
7. We strongly disagree with the proposed treatment of surface water flows on the site and believe that the site analysis works undertaken are inadequate in that they failed to address the overall hillside location of the site. The site is at the lower end of a hill side slope, elevations are around 125-142 mOD from here land rises gradually south towards Lugg Hill (300 mOD), continuing to rise to Saggart Hills. Good practice requires the establishment of the depth of the soils above the bedrock (believed to be greywacke slate) and the horizontal subsurface flows that may be occurring downwards across the site. We also strongly disagree with the proposed solutions directing water flows westwards towards Stoney Lane Road and the use of sub surface geo cellular storage system. We believe that a fully natural SUDS solution is possible in the context of the overall land holding by capitalizing on the existing land topography and hydrology and diverting ground water eastwards with appropriate surface filtration techniques towards the adjacent existing streams that feed Rathole woodland and park. It is worth noting two significant comments in the summary Hydrological Impact Assessment report for the adjacent Rathcoole woodlands site by Envirologic in April 2022

*"There is a high likelihood that any development works within, and in the immediate vicinity of, the woodland will disrupt the local hydrological and hydrogeological regime, thereby having a detrimental impact on the conditions currently supporting woodland habitat. "*  
and

*"Clearly, permanent drainage works are done with the intention of lowering groundwater levels in the long-term and this activity is perhaps the biggest threat to woodland conditions. The impact of drainage on the woodland will not only depend on proximity but position with respect to groundwater flow direction and orientation. Particular emphasis is placed in this regard on the upgradient area to the south where any drainage will intercept flows from the relatively long groundwater flow paths. Aside from removing groundwater that currently has a flushing effect, this intercepted groundwater would be transferred to surface waters which can have a knock-on effect of increasing flood risk to downstream receptors. "*

8. We would like to draw attention to the letter enclosed with the Romeville submission indicating that Bittermill Ltd are the beneficial owners of the red lined site, and the drawings attached to the Aecom infrastructure report section 1.1 indicate that a significant portion of Stoney Lane Road remains in Bittermill Ltd. ownership. It was our understanding following correspondence between SDCC roads Dept, Local councillors, Peyton residents and ourselves that the failure by Bittermill to return the road to public ownership was a breach of the Peyton planning conditions. If what we are assuming is



correct ,noncompliance by Bittermill ltd with previous planning permissions should be considered as part of this planning application.

9. Lastly in relation to the offer to turn the rural zoned portion of the site into a linear park , its value is limited in stepping stone terms of tree growth ,wildlife etc or use for playground , given the wayleave access and development restrictions required over the route of 3 large Irish Water infrastructure pipelines that traverse the south of the site in this location. Given that use and planting of the green space above the geo cellular storage system will also be restricted we would suggest that the quantity of green space and its location need to be revisited.

Regards,

Alan Fairman C. Eng.

RATHCOOLE COMMUNITY COUNCIL

Rathcoole Community Council  
c/o Alan Fairman  
Rathcoole Community Centre  
Main Street  
Rathcoole  
D24X039

Date: 28-Sep-2022

Dear Sir/Madam,

**Register Ref:** SD22A/0347  
**Development:** Demolition of 1 residential property and 1 ancillary outbuilding. Construction of a residential development of 42 three-bedroom dwellings in a mix of terraced and semi-detached units. The proposed will comprise of 2 typologies: typology F (21 dwellings) and typology L (21 dwellings) both 2 storey with typology F having a 2nd floor loft accommodation with front dormer windows. Total residential gross floorspace is 5622sqm. Development includes 84 in curtilage surface car parking spaces (3281sqm). Public open spaces in an eastern park and a western park (including proposed play equipment), an additional large parkland to the south of the site (11797sqm) comprising the first phase of linear park. Private domestic gardens. A new vehicular, pedestrian and cycle entrance from Stoney Hill road. An internal road network, including footpaths/cycleways. 3 refuse/bin stores, public lighting, landscaping, boundary treatments, drainage and engineering works and all other associated and ancillary development works.

**Location:** 2.9 hectare site, East of Stoney Hill Road, Rathcoole, Dublin  
**Applicant:** Romeville Developments Limited  
**Application Type:** Permission  
**Date Rec'd:** 01-Sep-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.sdublincoco.ie](http://www.sdublincoco.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](http://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

**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. Crowley  
for **Senior Planner**