

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

Four Districts Woodland Habitat Group,
c/o Deirdre Tierney, Chair,
47 Coolamber Drive,
Rathcoole,
County Dublin.

Date 4th October 2022

With reference to:

SD22A/0347

Romeville Developments Limited

Land Use Planning & Transportation

04 OCT 2022

South Dublin County Council

2.9 hectare site, East of Stoney Hill Road, Rathcoole, Dublin

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.

To whom it may concern,

This submission is made by Four Districts Woodland Habitat Group. The Four Districts Woodland Habitat Group advocates for the preservation and conservation of Rathcoole Woodlands. Rathcoole Woodlands is a priority Annex Habitat 91EO Alluvial Woodland containing springs with an affinity to another protected habitat Tufa Springs. The integrity of both habitats depends on the existing hydrology that support them remaining intact.

We are very concerned about the planning application, **SD22A/0347**, which is phase 1 of a 4 phase development on Stoney Hill Lane adjacent to Rathcoole Woodlands. Phase 1 is the gateway development for the other 3 phases. If the 4 phases are developed, we consider, there is a high likelihood it will adversely affect Rathcoole Woodlands.

Our concern is for good environmental outcomes for Rathcoole Woodlands. This is achieved through good and appropriate planning with full consideration of all the environmental conditions necessary to ensure the integrity of Rathcoole Woodlands.

We are concerned that Phase 1 will be the start of the hydrological disruption that could lead to water being diverted away from Rathcoole Woodlands. We are particularly concerned that this will be the case as further phases come online given their proximity to Rathcoole Woodlands.

Rathcoole Woodlands has no formal designated protection and therefore, any entity proposing any kind of development within its vicinity may consider it appropriate to screen it out for Environmental Impact Assessment, as has been done in this application. The Council need to make it clear that this should not be the case for Rathcoole Woodlands.

No environmental safeguards have been devised for Rathcoole Woodlands. For example, a surrounding environmental protection buffer, to ensure Rathcoole Woodlands and the hydrology that supports it, is protected. The buffer needs to be evidence based and scientifically sound.

The County Development Plan 2022-2028 states:

“12.3.2 Ecological Protection

In order to comply with European and National legislation on nature conservation, and to ensure that areas of biodiversity value are adequately protected, an Ecological Impact Assessment will be required for development proposals that have the potential to impact on environmentally sensitive sites. This includes sites that are protected under EU and National Legislation; sites that may be in use by or contain protected species or habitats; or sites that are in proximity to significant watercourses....”

it further states

“Where it appears to the Planning Authority that a development proposal that falls below the thresholds set out in the Planning and Development Regulations would be likely to have a significant environmental effect, a subthreshold / discretionary EIA can be requested by the Planning Authority. All Planning applications will undergo EIA screening or preliminary assessment.”

It is certainly the case that any kind of development, including **SD22A/0347**, in the vicinity of Rathcoole Woodlands needs to have an Ecological Impact Assessment that includes the full consideration of Rathcoole Woodlands.

There is also a Judicial Review on an existing approved application, **ABP-307698-20** containing **SD22A/0347** and is ongoing. We believe the Judicial Review, which the Four Districts Woodland Group are party to because we want to ensure the protection of Rathcoole Woodlands, should be completed before any consideration is given to further planning applications for the land concerned. The outcome of the Judicial Review could have important implications for subsequent planning applications for the entire site.

We also consider that all reports would be better addressing the development of the entire landholding to ensure both good planning and good outcomes for nature and the environment, in particular our beloved Rathcoole Woodlands.

We are also advocating for nature and the environment, in particular site/s such as this with their connectivity to Rathcoole Woodlands, being an important element of Green Infrastructure and Blue infrastructure.

We consider that it is not appropriate at this time to approve any development within the bounds of the SHD lands until the Judicial Review is complete, and in the absence of scientifically sound evidence that shows that Rathcoole Woodlands and the supporting conditions it requires for its integrity will not be compromised, while also giving full consideration to other elements of the natural environment; including bats, hedgerows and water.

We hope the Council take on board all of the aforementioned and the observations below in making their decision.

We make the following observations:

1. SD22A/0347 is not a standalone application.

It is very clear from the *Application - Cover Letter-6609940*, and page 6 *Other Assessments-6609944 Architectural Design Statement*, which states:

“Proposed to deliver development for the overall site through a series of smaller planning applications with the current proposal being the first of Phase 1.”

And the Planning Statement -6609975:

The layout and site strategy **mirror that as approved in the above referenced SHD** permission, in terms of street hierarchy and layout and in terms of open space. The layout allows for logical extension in to future phases of development on the overall landholding.

that **SD22A/0347** is not a standalone application.

These are just a few examples. The reason underlying the multi series of planning applications is given in point 2 below and has wider implications which are outlined in further points.

However, if subsequent phases are not approved, it will be a standalone estate.

2. Judicial Review is ongoing and concerns SD22A/0347

The proposed development, **SD22A/0347**, is Phase 1 of 4 phases, that combined, constitute the lands with planning approval from An Bord Pleanála, **Ref. ABP-307698-20**, which is the subject of a Judicial Review. The application is in effect an alternative approach to achieving development of the same land but without the needed environmental safeguards and full infrastructure assessments. The Judicial Review has a number of grounds, all of which apply to **SD22A/0347**.

The Judicial Review should be completed before any consideration is given to further planning application/s for the land concerned. The outcome of the Judicial Review could have important implications for subsequent planning application/s for the entire site.

3. Circumvention of Due Process.

In the Application Form - Part A-6609838, it asks:

Is the site of the proposal subject to a current appeal to An Bord Pleanála in respect of a similar development.

“No” is ticked, but it is very clear from the material supplied (see Point 1) that the intention is to develop the site as outlined in the SHD, that is subject to a Judicial Review. The multi phases approach to development of the overall site/landholding is in effect, delivery of the SHD application, **Ref. ABP-307698-20**, in another guise. The application clearly shows the four phases of the SHD (see appendix with map extracts) matching the four phases in **SD22A/0347** application.

The development mode adopted, of submitting multiple planning applications is to get around this clause. Multiple planning applications for a contiguous area is not good planning practice in the absence of an area plan and could lead to adverse effects on the natural environment.

4. An Approved Area Plan/Area Plan is required.

This application and indeed the entire landholding with its proposed phased developments require a local/approved area plan to achieve good environmental and planning outcomes, and is a requirement of RES N zoned lands according to the current County Development Plan 2022-2028:

“Zoning Objective RES-N: ‘To provide for new residential communities in accordance with approved area plans”

Material provided in In the Planning Statement-6609975, further underpins the need for a local/approved area plan, page 16:

In July 2009, ABP upheld a decision of SDCC to refuse planning permission for the proposed development, on the following 2 reasons:

- (1) *“Having regard to the central location of the development within lands zoned A1 - ‘to provide for new Residential Communities in accordance with Approved Area Plans’, it is considered that the proposed development of 54 number dwellings would be premature pending the preparation and approval of an area plan for these zoned lands. The proposed development would, therefore, materially contravene the zoning objective for these lands and be contrary to the proper planning and sustainable development of the area.*

The need for an Area Plan is also a point potentially subject to determination under the Judicial Review. No local/approved/ area plan is provided but it is needed.

5. An EIAR is required

Following on from point 1 and 4, an EIAR is required because **SD22A/0347** is part of a bigger plan that is adjacent to a priority annex habitat, Alluvial Woodland 91EO, Rathcoole Woodlands.

6. The conditions attached by ABP to the SHD development approval still apply and need to be addressed.

The conditions include:

2. No development shall take place under this permission until a detailed phasing programme for the approved development that has been agreed in writing with the Planning Authority. The applicant, owner or developer is advised to consult with the Planning Authority in advance of lodging the required programme.

Reason: In the interest of clarity and to provide for the orderly and sustainable development of the site and compliance with South Dublin County Council's Development Plan

4. No occupation of any of the proposed units or of the crèche facility shall take place in advance of the completion of the Tay Lane Pumping Station Upgrade Works. The application shall engage with Irish Water in relation to the upgrade works required and agree with Irish Water an appropriate contribution towards the cost of same.

In the interests of clarity, no temporary on-site storage of foul water is permitted as part of this permission.

Reason: In the interest of public health, the residential amenities of the area and in the interest of proper planning and sustainable development of the area.

5. Prior to commencement of development, a revised Flood Risk Assessment shall be submitted to, and agreed in writing with the Planning Authority detailing the following amendments: a. In the event of a failure of the surface water management proposals, a detailed appraisal of the residual flood risk to surrounding residential properties and details of appropriate mitigation measures to offset same, including details of flow paths.

Reason: To minimise flood risk and in the interest of proper planning and sustainable development of the area.

7. The development contravenes the County Development Plan Objectives.

Zoning: An area to the south west of the development currently with **Zoning Objective RU** is proposed as an open area amenity. This can only happen in areas zoned **Zoning Objective OS** – To preserve and provide for open space and recreational amenities. This area is currently zoned **Zoning Objective RU** – To protect and improve rural amenity and to provide for the development of agriculture. A change in zoning can only be achieved through proposing a variation to the County Development Plan and not through the planning process. It is noted that Open Space is permitted in principle under **Zoning Objective RU** but the proposed use goes against the spirit of the zoning.

8. Insufficient consideration of surface waters and groundwaters, potential for flooding and hydrogeological features in reports.

The only watercourse considered close to the site in the **Other Assessments-6610068 – Ecological Impact Assessment Report for proposed residential development at Stoney Hill Road, Rathcoole County Dublin. Prepared by Enviroguide Consulting** “is the Crockshane Stream, approximately 240 m to the southeast”. Yet the same report mentions “the surface water drainage network surrounding the site drains to the River Griffeen” with no specifications of what that water drainage network is while on page 19 it states:

“No pooling, ditches or wet grassland type habitats present”.

Yet the **Other Assessments-6610008 Proposed Residential Development in Stoney Hill Road, Rathcoole, Co. Dublin. Strategic Flood Risk Assessment**, places the Crockshane stream (referred to as the Coolmine stream in the report) as 323 m from the site.



Figure 4.3: Distance of Coolmine Stream to the Proposed Site

Confusion over naming of streams has been highlighted in the Hydrologist's report:
rathcoolewoodlands.org/wp-content/uploads/2022/06/Hydrological-Impact-Assessment-Envirologic-April22.pdf

There are two streams on the whole landholding and near the current proposed development site. See the 1912 Third Edition Six Inch Maps on South Dublin County Council Website:

<http://sdublincoco.maps.arcgis.com/apps/webappviewer/index.html?id=e0c5595b033341dea7661e248d2e9ee9>

One of the first order streams (Tributary of the Camac, the Coolmine Stream) has been diverted from its original course and is highly likely to revert to its original course towards Rathcoole in periods of excessive flow. The other stream (Tributary of the Griffeen, No name) starts to the south of this 1st phase. Its source is as a result of flow accumulation and flows towards Rathcoole at the back of the houses in Rathcoole Park and through to a small underground pipe at Mulally's Lane and from there under Rathcoole.

There is also a culverted stream running under and along Stoney Lane. This is downhill of the site to the north. Culverted streams can and do surface in times of excessive flow.

The full picture of the surface water bodies near this phase 1 proposal has not been fully captured. There is insufficient consideration of the impact of **SD22A/0347** on the hydrology of culverted and diverted rivers and the potential for floods. All of the aforementioned are more likely to impact existing houses downhill of the development and will be exacerbated by the proposed development and the proposed management of surface water. Climate change is resulting in rainfall of increased intensity, duration and frequency.

Most worryingly, in the **Other Assessments-6610068 (FRA)** (setting aside that it seems this report was intended for ABP, (page 5) and reviewed the Wicklow Development Plan (page 10)):

1. It uses the SFRA from the previous County Development Plan and therefore is out of date. Even so, the SFRA is a high level document and does not capture local conditions at field level nor does it adequately capture first order streams and therefore may not accurately reflect conditions on the ground at the level of granularity necessary for housing developments. It is all first order streams in the vicinity of this phase 1 development.
2. No FRA Stage 3 was carried out which requires (a) potential flood risk to the development (b) impact on flooding elsewhere and (c) effectiveness of any proposed mitigation measures:

This report addresses the requirements of a Stage 1 and 2 Site Specific Flood Risk Assessment.

3. There is nothing available on pluvial flooding:

The CFRAM maps did not develop a study for the subject area for pluvial flooding for the Rathcoole area. However, the pluvial flood risk will be mitigated through an effective surface water network and SuDS strategy.

4. A large attenuation tank is indicated as part of the flood mitigation measures, which is less than ideal.
5. No Local knowledge was sought on further evidence of flooding during the 2011 rain event when a "river" flowed down Stoney Lane, flooding the roundabout and entrance at Peyton Estate and Main Street, Rathcoole.

6. Therefore, the risk of flooding to the site, adjacent estates and Rathcoole Village is unknown and an assumption is made that the mitigation measures will work for an unquantified factor. No explanation is provided as to how the flood mitigation measures work. The management of flooding is entirely based on an unproven mitigation design solely for within the development with no reference to overland flow from outside the development or management for impacts on estates lower down should the measures fail.

This is supported by (**Infrastructure Report-6610005**):

Key Item to Note

The SHD application did not proposed a strategy for dealing with the overland flow coming from the south, that currently drains across the land and likely infiltrates to a degree.

We have seen on a few recent projects, particularly with Wicklow County Council, the requirement to provide an upstream catchment analysis and overland flow strategy that includes attenuation, to deal with these flows to ensure that the development does not create issues elsewhere. For example, in the case, the flows ending up out on Stoney Hill Road.

Examination of the groundwater recharge map on GSI viewer show low recharge coefficient (<25%) and as low as 15% on parts of the site where the start of one river (Griffeen Tributary) which means most rain fall remains as over land flow and does not go to groundwater. See:

<https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228>

The risk of flood to the site and to Rathcoole, and the unintended consequences from hydrological disruption because of the site location is underestimated or not estimated at all. Application **SD22A/0347** has not sufficiently considered surface water in (a) the design, (b) environmental impacts and (c) flood risk to and from development.

Rathcoole Woodlands, is close to the site with a clear flood mitigation function and biodiversity importance. Its existence is dependent on the hydrological connectivity with the catchment of the Camac Tributary. But it is also dependent on subsurface flows which have not been examined. Disruption of the hydrological cycle could have an adverse impact on its integrity.

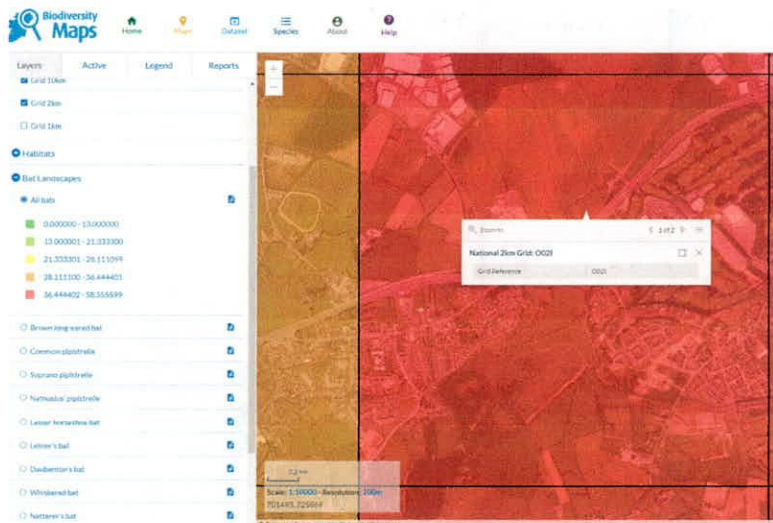
9. Poor consideration of bats

Other Assessments-6610068 – Ecological Impact Assessment Report for proposed residential development at Stoney Hill Road, Rathcoole County Dublin. Prepared by Enviroguide Consulting gives the impression that the 2 km Grid square, O021, within which application **SD22A/0347** sits is low scoring in terms of habitat suitability for bats:

5.3.1.3 Bats

There are 3 bat species recorded within the 2km grid square associated with the Site (O021), namely Brown Long-eared Bat (*Plecotus auritus*), Pipistrelle (*Pipistrellus pipistrellus sensu lato*), and Soprano Pipistrelle (*Pipistrellus pygmaeus*). The NBDC maps landscape suitability for bats based on Lundy et al. (2011). The index ranges from 0 to 100 with 0 being least favourable and 100 most favourable for bats. The overall habitat suitability index for bats in the area is 39.67. The species with the highest individual suitability scores for the area

A check of the National Biodiversity Data Centre Website shows no grid scores of 100, and indeed even within the high scoring zones, it is extremely challenging to find red 2 km grid square that score above 40:



It is a very high scoring grid and this is supported by the record of bat species for one outing. Five bat species were recorded in one outing, covering the area of all four proposed phases of the development. This is a very high number given that there are 11 species of bat recorded in Ireland. Eight of the nine resident species have been recorded on the East Coast. Five of the eight resident East Coast bat species have been recorded over Rathcoole Woodlands, rewilding areas and Rathcoole Park. **Five of the eight resident East Coast bat species have been recorded on this site in one night.** The accompanying map shows that the majority of the records were associated with hedgerows.

There are many pressures on bats including:

- urbanized areas (e.g., light pollution);
- removal of hedges, scrub, forestry;
- other pollution and human impacts (e.g., renovation of dwellings with roosts);
- infillings of ditches, dykes, ponds, pools and marshes;
- communication routes: roads;

Critically, while the vegetation on site was considered not to “offer bat roosting potential”, the house and its outhouse proposed for demolition in **SD22A/0347** were not assessed for bat roosts. Naturally, the wider landholding offers much more in terms of bat roost potential given the other houses and outhouses, but there was no mention of these.

The report also clearly indicates there will be negative permanent impacts on bats in both the construction and operation phase. Effectively, bat foraging will be curtailed by loss of habitat and urbanisation. The report also clearly states that the cumulative impacts could lead to higher levels of significance specifically mentioning bats:

“If the Proposed Development and existing or proposed projects (clearly indicated elsewhere there are 3 more phases to be proposed) impact on the same KERs,”

Yet this contradicts the conclusion where it states the impact for bats will be negligible if the mitigation measures i.e., trees and treelines/hedgerows are retained, yet it is unclear what is being retained and how connected the remaining hedgerow will be, seemingly from the maps, not all that connected. In addition, the report recommends a bat emergence survey and

internal assessment of the buildings are undertaken when vacant. This further underlining that the bat roost survey is needed, indeed it can be done while the buildings are occupied because the bats are either roosting in the attic or under the eaves of the house, or they are not.

10. Unclear how much hedgerow will be removed

Other Assessments-6610068 – Ecological Impact Assessment Report for proposed residential development at Stoney Hill Road, Rathcoole County Dublin. Prepared by Enviroguide Consulting indicates that:

6.1 Construction Phase

6.1.1 Impacts on habitats

The majority of the hedgerow habitat within the east of the Site will be removed during the Construction Phase to facilitate the Proposed Development. In the absence of suitable mitigation, the removal of this linear vegetation, and fragmentation of an ecological corridor, will have a *negative, permanent, moderate* impact.

However, there is no indication of how much hedgerow will be removed.

In **Other Assessments-6610072 Arboricultural Assessment:**

5.6.2 **So in summary**, 1No. of the individually tagged trees included within this assessment area along with c.181m from the c.424m of hedging that falls within this site areas red line boundary along with three small shrub borders are required to be removed to facilitate the proposed development works.

The loss of the above tree and hedge vegetation is to be militated against within the landscaping of this completed development with the use of trees, shrubs, herbaceous plants, bulbs and hedging. See project landscape architects plans and schedules for detail on this replanting.

In the **Planning Statement-6609975** in Page 9, hedge removal inferred from the figure provided. There is a map that shows where the hedgerows are removed in the **Tree protection Plan-6610075**. It is evident from this map that hedgerow will be fragmented. It would be much better if more or all hedgerow was retained to provide continuous connected green corridors for bats and other wildlife and to other areas within the Green Infrastructure network, in particular Rathcoole Woodlands.

11. Ancillary Observations

- **Traffic Impact Reports-6610010** - Pointless given its phase 1 of 4
- Waste water management remains as per condition set out in **Ref. ABP-307698-20** and basically the units cannot be occupied until Tay Lane is upgraded in 2026.
- It is worth noting that **Infrastructure Report-6610005** states that SUDs features are “incompatible with the topography of the site and the nature of the proposed development”. The nature of the site, i.e. the slope is too steep to position features properly and function. And the nature of the development seems to mean “there is no room for verges along the proposed roads where swales could be proposed”. The former suggests that may be the site is not particularly suitable for the development proposed, and that the design layout needed to give more consideration to accomodating SUDs features. This does not bode well for future phases.

12. Rathcoole Woodlands

There are limited references to Rathcoole Woodlands in **SD22A/0347** and no assessments of impact or otherwise:

Other Assessments-6610068 – Ecological Impact Assessment Report for proposed residential development at Stoney Hill Road, Rathcoole County Dublin. Prepared by Enviroguide Consulting

The v2.9 ha site is 170 m west of Four Districts Woodlands (Rathcoole Woodlands)

In reference to Bats:

linear habitat provides potential commuting and foraging habitat, as does the grassland on Site. This hedgerow also acts as an ecological corridor, connecting the Site to the Four Districts Woodlands.

Other Assessments-6610070 EIA Screening Report Housing Development Malone O'Regan

4 RECEIVING ENVIRONMENT

This section describes the existing conditions at the Site. The land to the immediate north, west and east of the Site comprises existing residential developments. Further east comprises greenfield sites and further west comprises Rathcoole Woodlands. To the south of the Site are greenfield sites.

(iii) the marine environment; mountain and forest areas,	(iii) The Site is located ca. 300m from Rathcoole woodlands which currently does not have any formal protected designation.
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The reports and assessments supplied, are solely focussed on, and limited to the 2.9 ha of area subject of the planning with no consideration of future phases and the wider environment except for impacts on NATURA 2000 sites which does not consider Rathcoole Woodlands because, although a protected habitat, it is not within a NATURA 2000 site. Of grave concern is presenting the lack of statutory protection for Rathcoole Woodlands, as a reason not to carry out an Environmental Impact Assessment. This is contrary to *“paying particular attention to.....(v) areas classified or protected under legislation...”*. Rathcoole Woodlands is protected under legislation, the Habitats Directive and the Environmental Liability Directive, in the event of imminent threat of or actual damage to it. This makes Rathcoole Woodlands extremely vulnerable not only to the current development phase, and the phases to follow, but any development in its proximity. We strongly believe an Environmental Impact Assessment should be carried out.

County Development Plan 2022-2028

“Wildlife networks and areas located outside of protected sites can also host a diverse and rich variety of rare, protected and vulnerable habitats and species....”

NCBH2 Objective 3:

To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as ‘stepping stones’ for the purposes of green infrastructure and Article 10 of the Habitats Directive.

and

“A number of habitats and species listed in Annex 1 and Annex 2 of the Habitats Directive are also known to occur at locations outside of protected sites. Strict protection is afforded under Annex IV of the Habitats Directive to some of these species, for example all bat species and otter. The planning process will seek to protect rare and threatened species, including species protected by law and their habitats. Applicants must demonstrate that proposals will not have a significant adverse impact on such species and their habitats. The Planning Authority will take account of the views of the Prescribed Bodies and any licensing requirements in relation to protected species....”

“Wildlife habitats that are not nationally designated may still be important at a County level by acting as Green Infrastructure stepping-stones within the wider ecological network. This is encapsulated by Article 10 of the Habitats Directive which encourages the management of features of the landscape which are of major importance for wild plant (flora) and animals....”

*“Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas
Protect and promote the conservation of biodiversity outside of designated areas and....”*

Rathcoole Woodlands is part of the Green Infrastructure Network and as such connectivity to it needs to be maintained if the network is to function. Current plans for the hedgerows indicate otherwise.

We are concerned that Phase 1 will be the start of the hydrological disruption that could lead to water being diverted away from Rathcoole Woodlands. We are particularly concerned that this will be the case as further phases come online given their proximity to Rathcoole Woodlands. Geological and hydrological evidence certainly suggest the hydrology is complex. The understanding of the hydrology and the interaction of this Phase 1 and subsequent phases with it, is seriously lacking.

It is evident that the at the southern end of the development, flow changes towards the woodlands, with a more west to east direction compared to the northern end of the development where flow veers more towards the Stoney Hill Road and Main Street.

The engineer does suggest that:

Key Item to Note
The SHD application did not proposed a strategy for dealing with the overland flow coming from the south, that currently drains across the land and likely infiltrates to a degree.

We have seen on a few recent projects, particularly with Wicklow County Council, the requirement to provide an upstream catchment analysis and overland flow strategy that includes attenuation, to deal with these flows to ensure that the development does not create issues elsewhere. For example, in the case, the flows ending up out on Stoney Hill Road.

Our concerns are well founded.

There are two very significant (geological) faults that intersect just at edge of Rathcoole Woodlands. These have not been referenced. Water tends to rise from or be channelled along faults. There are also 3 different rock formations under the proposed 4 phases of development This suggest quite a complex water flow/hydrology. See [Geological Survey Ireland Spatial Resources \(arcgis.com\)](https://www.arcgis.com):



In addition, the following reports each highlight the importance of an intact and undisturbed hydrology for maintaining the integrity and condition of Rathcoole Woodlands.

<http://rathcoolewoodlands.org/wp-content/uploads/2021/12/Rory-Hodd-Report-on-Rathcoole-Habitats-Aug-2021.pdf>

"This Priority Annex I habitat is a water dependant habitat; therefore, any activity (within or adjacent to the site) that alters site hydrology could negatively impact the woodland (e.g., species composition change). The presence of this Priority Annex I habitat has implications for any future developments within or adjacent to the Rathcoole woodland site..."

rathcoolewoodlands.org/wp-content/uploads/2022/06/Hydrological-Impact-Assessment-Envirologic-April22.pdf

Within Rathcoole Woodlands is a large area of nationally important habitat that is wholly dependent upon local hydrology and hydrogeology.

As the study has revealed that the woodland ecology is controlled by local hydrology and hydrogeology it follows that any alterations to same are likely to have a detrimental impact to the woodland.

Though by no means exhaustive the woodland is likely to be extremely sensitive to some or all of the following activities, with reference to specific areas where works have potential to have a higher degree of impact

"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. "

Signed Deirdre Tierney

Date 4th October 2022

Appendix: Figures from the current planning application:

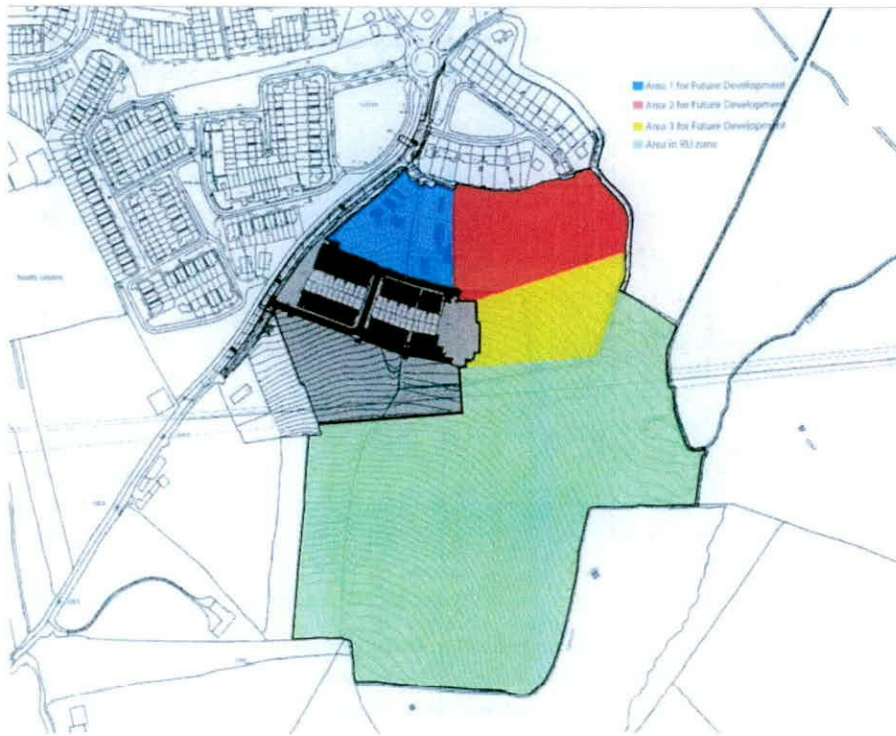
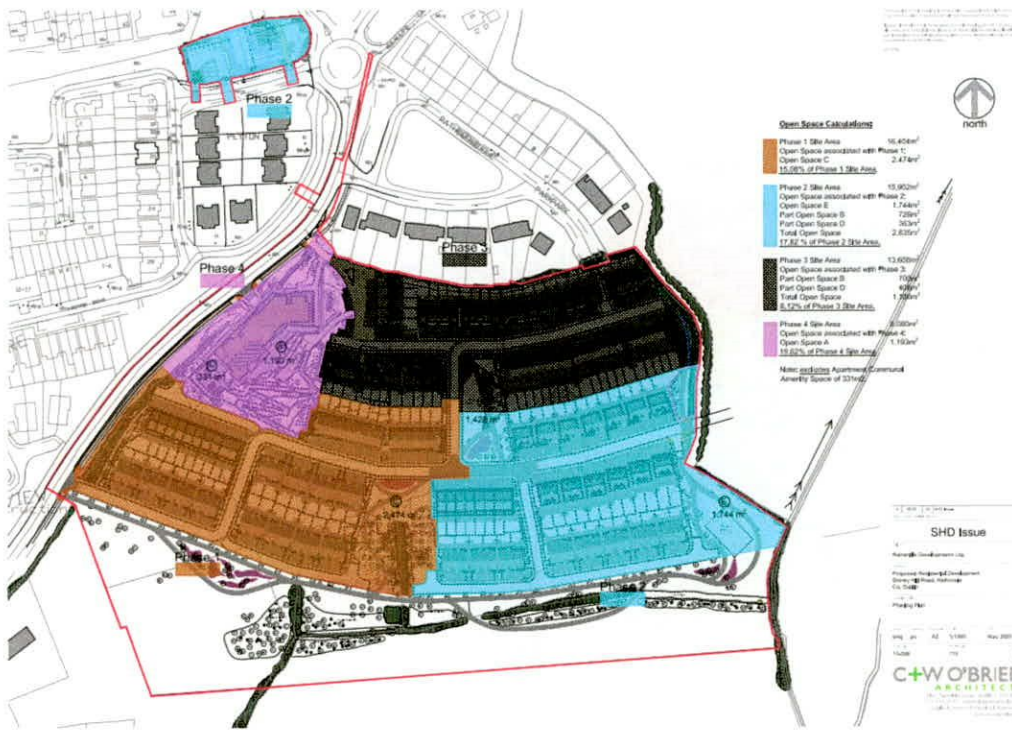


Fig 4.1.3 – Image showing potential future phases



Figure 1 – Site(s) Location
Source: Google Maps

Figures from SHD application



Taken from SHD application, document Other Assessments-6410706 showing the proposed phases

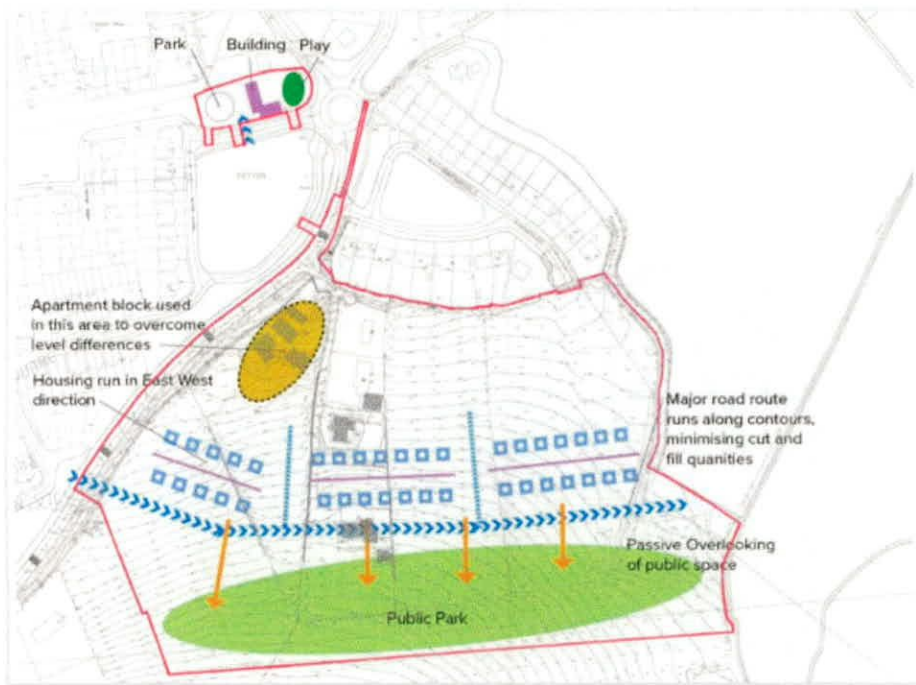


Figure 4: Conceptual diagram of preferred site layout arrangement
Source: C+W O'Brien Architects

Extract from Statement of consistency with Planning Policy

Four Districts Woodland Habitat Group
C/o Deirdre Tierney,
Chairperson
47, Coolamber Drive
Rathcoole
Co. Dublin.

Date: 07-Oct-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.

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**

