

**95 Woodfield  
Scholarstown Road  
Rathfarnham  
Dublin D16H2Y6**

**28 November 2022**

**Planning Department  
South Dublin County Council  
County Hall Tallaght  
Dublin D24 A3XC**

**planningsubmissions@sdublincoco.ie**

**Reference Planning Application by Emmaville Limited for the development at the site of  
Scholarstown House, Scholarstown Road, Dublin 16, D16 E2H9 – RPS Ref 322  
Reg Ref SD22A/0401**

**Dear Sir/Madam**

I am writing to express our concerns with the above referenced planning application for the proposed development at the site at Scholarstown House, Scholarstown Road, Dublin 16, D16 E2H9 .

These proposals seek to develop a large scale, bulky and high density development on the Scholarstown House lands and to make significant alterations to the interior of the protected structure – Scholarstown House.

In this regard, I wish to submit the following observations.

### **Scale, Bulk, Density, Height**

The planning application proposes the construction of 74 apartments, in an apartment block ranging in height from 3 to 5 stories in height.

This density, when taken with the Two Oaks “buy-to-let” development in progress on the former “Cosgrove” lands fronting on Scholarstown Road, is unsupported by the current infrastructure in the locality.

The proposed building is considerably higher than the adjoining housing developments in Orlagh Estate and Woodfield Estates which both comprise two story single family dwellings. It is also in excess of the Ros Mor View development on the opposite side of the Orlagh Roundabout, which is a 4 storey building, with the top floor recessed. The density of Ros Mor View of 35 apartments is considerably less than the proposed density of the 5 story development - Ros Mor and Scholarstown House have footprints of similar size but the Scholarstown House proposal is for more than twice as many apartments.

The height of the proposed development represents an overbearing presence to the houses in the adjoining Woodfield and Orlagh estates. Image 17 of the photo montages included with the application demonstrates the stark, dreary aspect of the development.

## Proximity to St Colmcilles Community School

I also note the proximity of St Colmcilles school to the proposed development. The site is directly adjacent to the school grounds. This proximity together with the excessive height of the development will mean that, depending on their aspect, apartments and any balconies in the higher stories would overlook the school, its grounds and playing fields. This raises concerns for the privacy of the children as well as child protection/safety issues.

In addition, these apartments are adjacent to the school astro pitch. This pitch is used in the evenings by adult soccer teams and apartment residents will be impacted by lighting, noise and foul language emanating from these teams.

## Car Parking

40 new car spaces are planned for 74 apartments. The ratio of car spaces to housing units is significantly different in the Scholarstown House proposal than it is in the existing Ros Mor development (64 spaces for 35 units) and the under-construction Two Oaks development (459 spaces for 590 units).

Scholarstown Road and the nearby housing estates, especially Orlagh and Woodfield estates already have significant car parking and traffic challenges. This is especially evident along the stretch of Scholarstown Road between Orlagh Roundabout and Templeroan Roundabout. This is likely to deteriorate further as the Two Oaks development on the Cosgrove lands are completed and become occupied.

Spillover of car parking and the negative impact of traffic from this oversized new development will make an already bad situation intolerable.

## Public Transport

The Traffic and Transportation Assessment Report included in the application relies on, inter alia:

- improvements in public transport
- proximity of the development to bus and Luas links. It would take a minimum of 30 minutes by bus to reach the nearest Luas stop at the Square in Tallaght. The direct bus service is the 175 bus, operated not by Dublin Bus but by GoAhead, and is notoriously unreliable.

The public transport links in Knocklyon are already insufficient. There is no direct public transport available to areas such as major employment hubs/industrial areas. A single bus (the 15 route) towards the city centre serves the area between the Woodstown estate and the Scholarstown roundabout. During peak morning traffic the buses are full when they reach the Orlagh roundabout. The service is incapable of handling the likely additional passenger numbers from Two Oaks, even before the proposed Scholarstown House development. I would refer you to the Ballyboden Tidy Towns & Glendoher & District Residents Association [September 2021 submission](#) on the County Development Plan, which elaborates on Public transport Deficiency, saying:

*It is considered best practice and preferable to direct high-density development into areas which have excellent public transport, employment, retail, and social/community infrastructure rather than to poorly served and capacity constrained areas such as Ballyboden. None of the ingredients are in place to encourage existing and future residents to*

*increase modal shift away from car use to more sustainable modes of transport and Bus Connects will not address this.*

There has been no improvement in public transport for the Ballyboden-Knocklyon area in the intervening year, and once residents move into Twin Oaks local bus services will be under even greater pressure.

## Traffic

The Traffic and Transportation Assessment Report is based on traffic measurements taken on 11 May, 2022. The weather records show that May 11 was mild, dry and overcast ; this fine weather is very likely to have had a mitigating effect on traffic levels. From at least October to March, cold, wet weather and dark mornings and evenings prevail; traffic is significantly increased at peak hours and school opening and closing times. This was not taken into account in the Traffic and Transportation Assessment Report.

The Traffic and Transportation Assessment Report is based solely on traffic measurements at the Orlagh Roundabout. It fails to take into account the impact of the traffic lights recently installed at Woodfield estate. These lights have contributed to additional traffic delays and queuing, as well as safety concerns which have been reported to the SDCC Traffic Management Committee.

In March 2020, South Dublin County Council published its own "Orlagh Roundabout Review Report". It referred to traffic counts taken in November 2014, February 2019 and December 2019. This report gives significantly different results from the Traffic and Transportation Assessment Report:

	Traffic and Transportation Assessment Report, May 2022	Orlagh Roundabout Review Report, Dec 2019
Morning peak hour	7:30 - 8:30	8:30 - 9:30
Longest queue	(vehicles)	(metres)
<ul style="list-style-type: none"> <li>● Scholarstown Rd (R113 - E)</li> <li>● Orlagh Grove</li> <li>● St Colmcille's Way (R113 - W)</li> <li>● Scholarstown Rd (N)</li> </ul>	1.7 0.1 1.9 0.5	72.5+ 15 15 20

This table demonstrates the possible impact of winter (the SDCC report) compared to spring/summer (the report used for the planning application), and of a possible skew depending on when "peak" traffic is assessed.

The conclusion of the SDCC Orlagh Roundabout Review Report states:

*While it is acknowledged that queuing times have increased at this roundabout a lot of this has been caused because of general background traffic and overall congestion on the road network is getting worse.*

It should be noted that the St Colmcille's Way - Scholarstown Road - Ballyboden Way route forms part of a designated emergency diversion route at times of relevant M50 traffic incidents. This was not taken into account in the Traffic and Transportation Assessment Report. The M50 is already showing signs of overload at peak times, particularly southbound in the mornings and northbound in

the evenings due to commuter traffic. In addition, during evening rush hour there are long queues at both north and south exits at Junction 12, leading to the Knocklyon area. This was not considered in assessing road capacity in the Traffic and Transportation Assessment Report.

### **Fire Safety**

The plans for the two-bedroom unit to be created at the rear of the protected structure of Scholarstown House show only one ground floor entrance/exit door. There is no exit door from the kitchen. This design may not comply with fire safety regulations and should be reviewed.

### **Visual Amenity/Architectural Assessment**

The apartments included in this proposal will be built from a combination of yellow/brown bricks and grey/white bricks, topped with grey/brown metal sidings. The result is an ugly combination that fails to reflect either the colour scheme of the existing Scholarstown House or of the brickwork used in Orlagh, Ros Mor or Two Oaks. In fact the grey/white bricks in the plans are not used anywhere else in Knocklyon so far as I know. The full five-storey building will dwarf Scholarstown House, a protected structure, and is not sympathetic to the existing structure.

The photo montages (images 6 and 17 particularly) included with the planning application show that the road-facing side of the apartment block on Orlagh Grove Road will be a long stretch of this ugly colour scheme, broken up by a large, square vehicular entrance to the complex.

Section 7 of the Architectural Assessment refers to creating a "new urban edge" onto Orlagh Grove. Knocklyon is a suburban neighbourhood in no need of an "urban edge" provided by an apartment development.

The Architectural Heritage Impact Assessment included with the planning application quotes (on Page 9) the South Dublin County Development Plan 2022-2028, NCBH19 Objective2, which includes ensuring that any development plan involving a protected structure is "sympathetic to... the special character and heritage (of the structure)... and appropriate in terms of architectural treatment, character, scale and form".

It is difficult to see how the proposed development meets the relevant objectives of the County Development Plan.

Finally, given the historical significance of the site and the long period of continuous occupation, it might be appropriate to carry out a full archaeological survey of the site to ensure that no artefacts of historical importance or unmarked burial sites are at risk of destruction during development.

### **Tree destruction, wildlife habitat**

The planned development will involve substantial tree-felling on a mature site. While a bat study found no bat nesting sites, there has been no assessment of the impact on birds. In September 2022 Birdwatch Ireland published a report that indicates that 63% of Ireland's bird population is in decline. The large-scale removal of habitat and possible bird-nesting sites should be assessed as part of the planning process.

## **Building Life Cycle Report**

The Building Life Cycle Report indicates that:

- condensing boilers, natural ventilation are being **evaluated**
- heat recovery ventilation **will be considered and assessed**
- PV solar panels are being **considered**
- air source heat pumps **will be assessed**

and that the specific combination of these low energy options will be decided with the aim of achieving a Near Zero Energy Building.

This wording suggests a considerable uncertainty as to which technologies may be implemented. I would expect that these decisions should be finalised in advance of any planning permission.

## **Playground**

A small public playground is included in the development plan, on the corner of the entrance to Orlagh Grove. While the inclusion of a public play-space is welcome, its placement beside a busy road, with M50 traffic and buses (a service that the Traffic Plan expects to improve) does not provide a welcome environment for small children. The potential impact of noise on young ears, and polluting and possibly carcinogenic vehicular emissions should be assessed.

## **Community Planning**

There is significant demand in Knocklyon and the surrounding area for family homes and for down-sizing by empty-nesters, neither of which is addressed by recent apartment developments such as Two Oaks or planned developments such as at Scholarstown House. Smaller, age-friendly developments would enable older owners, retirees etc to downsize while staying in the area, freeing up larger family homes for young families who may have outgrown apartment living.

The location of Scholarstown House would be ideal for such a development and it is disappointing to see yet another plan which fails to address the existing needs of the local population.

In addition, I would query the apartment mix. Knocklyon is an established residential family area, providing little in the way of local employment opportunities yet almost half of the planned apartments are one bedroom. This is similar to the Two Oaks development, where 246 apartments out of 590 are one-bed apartments. Where are all these single residents expected to work, and given inadequate public transport, how will they get there?

## **Summary**

This proposed development by virtue of its scale, bulk, density and height, diminishes rather than enhances the external environments it impacts upon.

The application seeks approval for a quantum of development beyond the capacity of the site and surrounding infrastructure. It will considerably negatively impact on the current environments and mature housing estates in the locality.

The proposed development ignores or glosses over existing traffic and public transport constraints and fails to take into account the residential accommodation needs of the existing community.

I attach a screenshot of Receipt No T4/0/724957 for the Statutory fee of €20.00 which has been paid to the Council's Payments Office.

Yours faithfully,

Teresa Trainor

Note:

Birdwatch report:

<https://birdwatchireland.ie/nearly-half-of-all-bird-species-in-decline-globally-but-63-of-irelands-bird-species-declining/>

Ballyboden Tidy Towns & Glendoher & District Residents Association September 2021 submission:

<https://consult.sdublincoco.ie/ga/system/files/materials/6271/7175/BBTT%20-%20SDCC%20Draft%20Plan%20Submission%202022-2028%20final.docx>

Orlagh Roundabout Review Report: <http://www.sdublincoco.ie/Meetings/ViewDocument/66126>

Ms. Teresa Trainor  
95 Woodfield  
Scholarstown Road  
Rathfarnham  
Dublin 16

Date: 28-Nov-2022

Dear Sir/Madam,

**Register Ref:** SD22A/0401

**Development:** Demolition of the 4 existing shed structures on site within the curtilage of the protected structure; Retention and conversion of Scholarstown House (Protected Structure) into two residential units comprised of 1 two bed and 1 three bed units served by private open space in the form of ground floor terrace; The proposed works to Scholarstown House include but are not limited to internal re-configuration; Re-location of the staircase to its original location within the house; Removal of non-original features including the closing up of non-original openings; Creation of a new door opening within the existing alcove, and the blocking up of a window opening both located on the northern elevation; Construction of an apartment block ranging in height from 3 to 5 storeys containing 74 apartment units comprised of 32 one bed apartments, 33 two bed apartments, and 9 three bed apartments all served by private open space in the form of balconies and/or ground floor terraces; The proposed development also includes 100sq.m of residential amenities and facilities consisting of but not limited to a reception, communal amenity room and parcel room; The development will be served by a total of 40 car parking spaces and 183 cycle parking spaces accessed via a new pedestrian and vehicular access off Orlagh Grove with the existing entrances on Scholarstown Road and Orlagh Grove being re-configured to provide for pedestrian and cycle access; All ancillary development works required to facilitate the development including but not limited to, plant rooms, a substation, bin stores, landscaping, boundary treatments and lighting; The proposed development comprises the carrying out of works to a protected structure: Scholarstown House (RPS Ref: 322).

**Location:** Scholarstown House, Scholarstown Road, Dublin 16

**Applicant:** Emmaville Limited

**Application Type:** Permission

**Date Rec'd:** 25-Oct-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.southdublin.ie](http://www.southdublin.ie), [www.doshraid.ie](http://www.doshraid.ie) - [fixyourstreet.ie](http://fixyourstreet.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 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. Crowley*  
for **Senior Planner**