



15th September 2021

Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3EX.

Re:

**Submission in relation to the
South Dublin County Council's Draft Development Plan 2022-2028
on behalf of Cavan Developments Limited (Ltd.) in relation to lands at
Rathcoole, Co. Dublin**

Dear Sirs,

Introduction

We act on behalf of Cavan Developments Ltd (hereafter Cavan Developments) of Breffni House, Hartwell Road, Kill, Co. Kildare who are the owners of lands at Rathcoole, Co. Dublin. Cavan Developments are a family operated residential construction company native to Rathcoole. They initially commenced house construction in Rathcoole circa 2000, and have completed two developments, at Broadfield Manor and Rathmill Manor. Presently they are pursuing planning permission for a new development at Tootenhill under Reg. Reg. SD21A/0087. All these developments are located at the western end of Rathcoole, south of the N7 National Primary Route.

This is a submission on behalf of Cavan Developments, who were founded over 40 years ago and have acted as a medium sized family run house building company. They have built approx. 3,500 dwellings during the past 40 years mainly in Dublin with some in North Kildare, building right through the recession, when the country was at a standstill and the majority of builders / developers were in receivership.

Cavan Developments have completed numerous private residential developments to a very high standard, mainly in the South Dublin County Council area and have a good working relationship with South Dublin County Council who in turn have taken these developments in charge. Over the past forty years Cavan Developments have contributed to local authorities, mainly South Dublin Co. Council, through financial contributions and they have generated significant revenue to the State through PAYE, Taxes and VAT payments. They have paid SDCC financial / development contributions in the sum of over €4m from year 2000 to date in Rathcoole.



Our clients lands have additional lands located at Rathcoole which are the subject of this submission. As part of this submission, our client wishes to put the following forward in relation to those lands and their classification in the Draft South Dublin County Development Plan 2022-2028, with this submission seeking the following:

Proposal No. 1:

Rezoning of “RU” zoned lands to “RES-N” zoned lands at Green Lane, Rathcoole to compensate for the constraints prevailing to lands currently zoned “RES-N” at Tootenhill, Rathcoole in tandem with the loss of capacity arising from the rezoning of “RES-N” zoned lands to “RU” zoned lands

And

Proposal No. 2:

Construction of a new road as a replacement to Whitehouse lane from the N7 junction to a proposed roundabout at Johnstown Road. This road will be constructed along the line of the WDOR and lands for the reservation of the WDOR will be preserved on Cavan Developments lands. The above will facilitate the future construction of the proposed WDOR

Our detailed comments are set out below and we request that they be taken into consideration in as part of the adoption of the new South Dublin County Development Plan 2022-2028 (hereafter CDP). Prior to detailing the above mentioned proposals, we will first set out the locational and planning context of the subject lands in support of both proposals.

1.0 Location

Our client owns lands to the west and south of Rathcoole, with one particular parcel of land bisected by Green Lane, see Fig. 1 below for exact location and Fig.s 2 & 3 which identify our client's lands on the proposed Land Use Zoning Maps sheets numbered 7 & 8 from the Draft SDCC CDP 2022-2028. These lands are in our client's private ownership and measure c. 20 acres in total and are zoned as 'RU' in the current 2016-2022 Development Plan, with the same land use zoning objective proposed to be attached to the lands in the current Draft Plan.

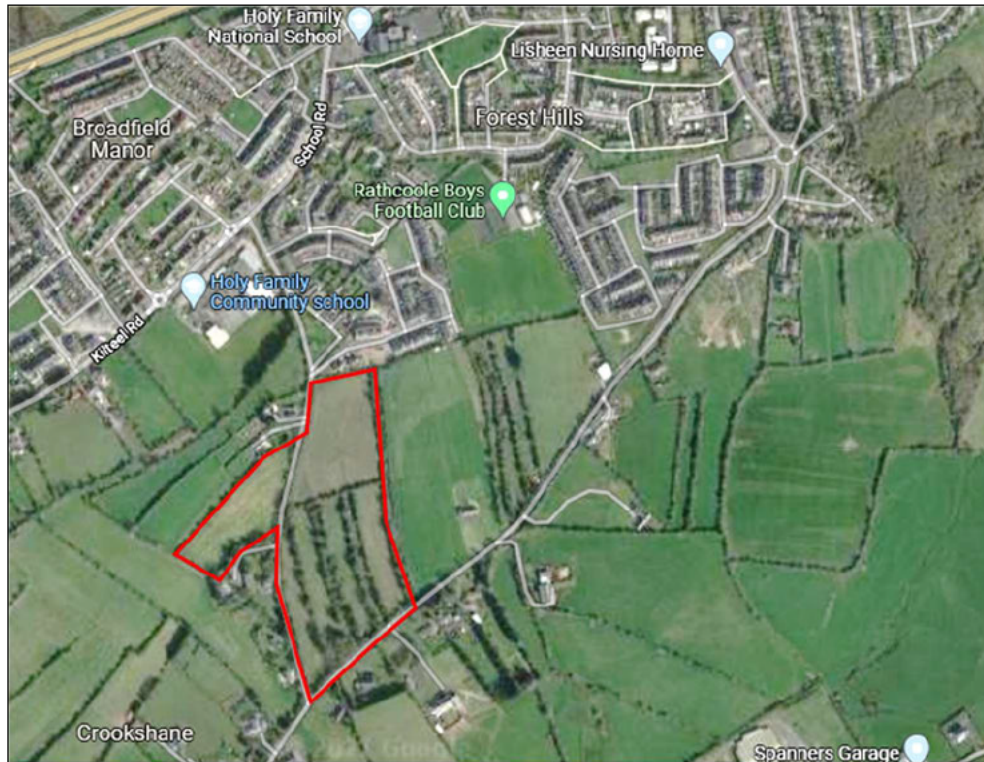
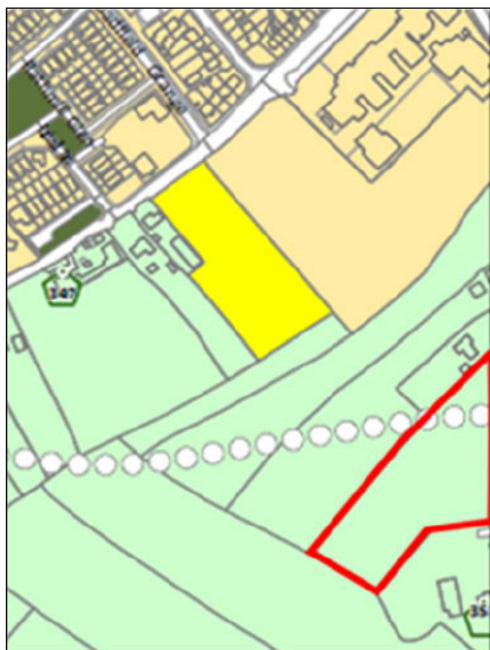


Fig.1: Location of Client's Lands



Map Sheet 7

**Fig 2: Lands owned by client
West of Green Lane, Rathcoole**
Source: Zoning Object Map,
Sheet 7, Draft SDCC CDP 2022-
2028



Map Sheet 8

**Fig 3: Lands owned by client
East of Green Lane, Rathcoole**
Source: Zoning Object Map, Sheet
8, Draft SDCC CDP 2022-2028



2.0 Planning Context and Location of Subject Lands:

The lands are currently zoned Objective RU: *“to protect and improve rural amenity and to provide for the development of agriculture”* in the South Dublin County Development Plan 2016-2022. The current Draft Plan 2022-2028 seeks to retain the RU land use zoning on the lands.

As can be seen on Figs 2 & 3 above, a section of the proposed roads objective, the Western Dublin Orbital Route; is proposed to traverse through our client's lands. This submission puts forward to the Planning Authority the benefits of re-aligning the indicative location of the proposed Western Dublin orbital Route to facilitate a more efficient use of lands, details of which are set out below.

This submission below also sets out some of the challenges facing South Dublin County Council over the lifetime of the emerging County Development Plan. The primary issue, in our view, is the adequate provision of affordable housing in appropriate and sustainable locations to meet the current and future housing demand.

3.0 Planning Considerations

3.1 Proposed Land Capacity, Zoning and Project Population

As per the Draft County Development Plan 2022-2028, the Council states that there is a housing need for 13,260 new homes up to 2028 which, in addition to the units under construction, will meet the requirement for 17,817 homes. As a result, based on the housing capacity of existing undeveloped zoned land in South Dublin County, the Council deem that there is no requirement to zone additional land to serve the needs of population and housing targets set by the Ministerial Guidelines and the NPF Roadmap as detailed in the Draft Plan. The map set out in Fig. 4 below illustrates the extent of the total housing capacity sites on 1,039 hectares of available zoned land.

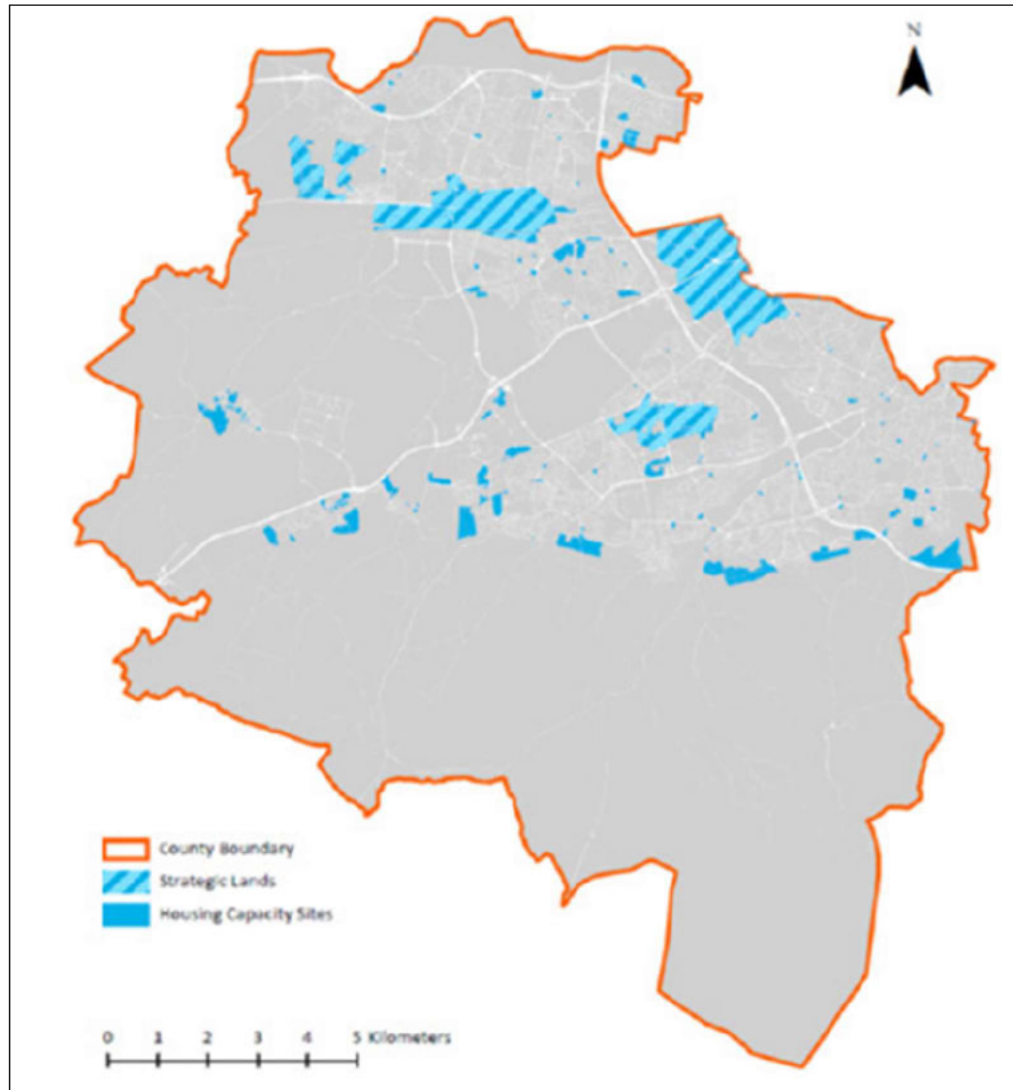


Fig. 4: Image of Land Capacity Sites identified in the Draft County Development Plan 2022-2028

While we recognize that SDCC is required to have consideration of the NPF and RSES figures, we would advocate that the potential for additional population growth in line with more recent information from the Central Statistics Office (hereafter CSO) be considered.

South Dublin's population in 2016 was 278,767, representing an increase of 5.1% between 2011 and 2016. This is at the higher level of population growth within Dublin for that period. The NPF and RSES have established population targets for each county. The population projections were based on the 2016 Census. The population targets include a low and a high range for 2026 and 2031. The figures in the table below are taken from Appendix B of the RSES. The targets for Dublin and South Dublin are set out in the following table, over:



	2016 Census	2026 Range		2031 Range	
Dublin NPF Road Map	1,347,359	1,489,000	1,517,500	1,549,500	1,590,000
RSES SDCC Allocation	278,767	308,000	314,000	320,500	329,000

The RSES allows for a population increase of between just 40,000 (low) and 50,000 (high) up to 2031 within South Dublin. This equates to an increase of just 3,500 per year.

The latest population figures from CSO indicate Dublin's population will grow to between 1,512,500 (low growth model) and 1,600,100 (high growth model) by 2026 and between 1,593,800 (low growth model) and 1,730,600 (high growth model) by 2031. These figures clearly exceed those stated in the NPF and RSES. CSO have not estimated population growth figures per County Council administrative area. However, allowing that South Dublin represented c. 20% of Dublin's population in 2016, we can estimate that South Dublin's population would be c. 302,500 – 320,000 in 2026 and c. 318,700 – 346,000 in 2031. It would appear, based on the latest available information, that population growth for South Dublin has potentially been underestimated. This has critical implications for the core strategy and housing strategy in the Draft Plan.

Our client is concerned that if the figures set out in the NPF and RSES, are used to project population growth and resulting housing need for the period 2022 – 2028, there is a serious risk the projections will fall far short of the actual population figures and ultimately lead to a shortage of appropriately zoned land to cater for the demand. This has the potential to have a significant negative impact on the delivery of new homes and lead to uncertainty in the market at a time when delivery is key.

Based on the population increase envisaged in the RSES up to 2031, and using the national household size of 2.75, there will be a need for at least c. 14,000 – 25,000 new homes in SDCC by 2031. Allowing that population increases may be higher, and the pent-up demand reflected in the high household size and extremely low vacancy rate in the county, this figure is likely much higher. SDCC must ensure that the future CDP they adopt facilitates this housing need in the preparation of the new core strategy, through provision of sufficient zoned land and supported by appropriate policies. It is essential that potential housing need for South Dublin is correctly estimated using the most up to date and accurate information available to ensure a robust, and rigorous housing need assessment.

3.2 Rathcoole Review and Considerations

Following on from the above, with reference to the settlement of Rathcoole which is of interest to our client, we have undertaken a review of the proposed lands zoned 'RES-N' for inclusion in the CDP. The Draft County Development Plan 2022-2028 illustrate on Zoning Map's Sheet 7 & 8, the following parcels of land which maintain the land use zoning objective 'RES-N'. As noted above, these are continued from the current CDP as no new areas of land are proposed to be zoned in the Draft Plan.

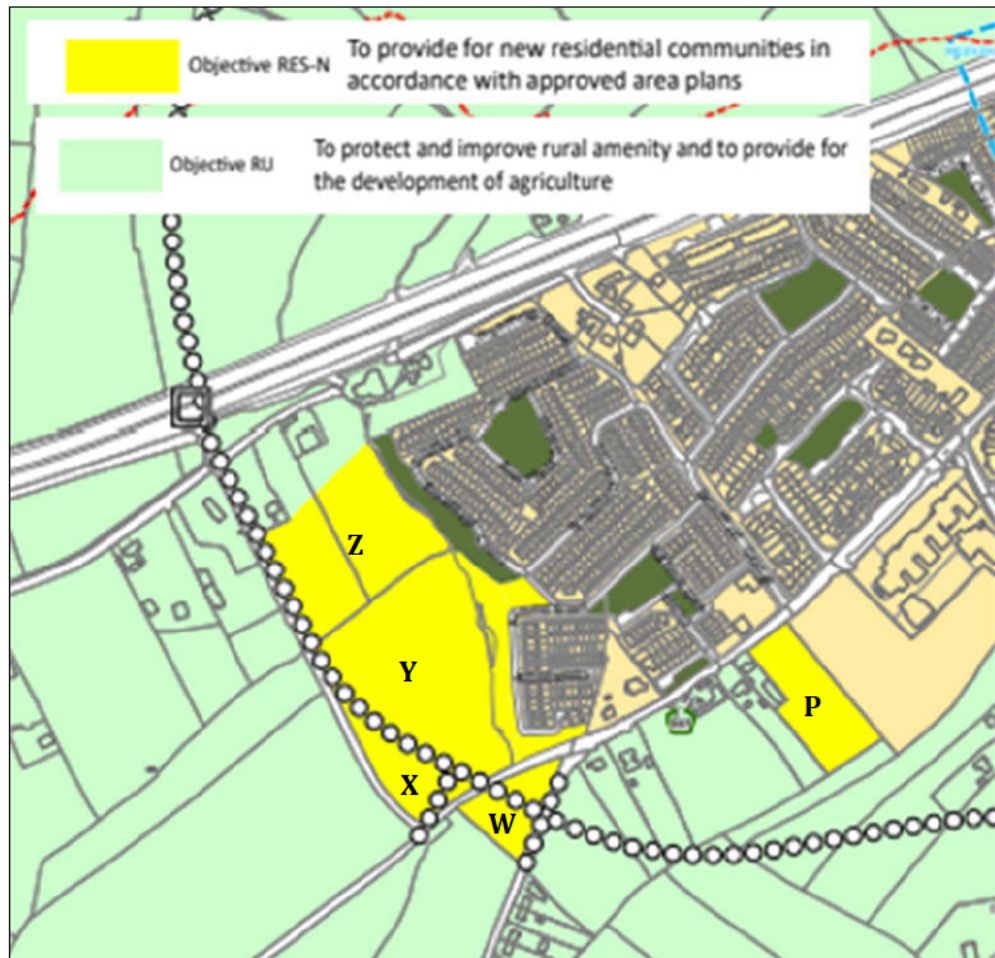


Fig 5: Parcels of lands to the west of Rathcoole with "RES-N" Zoning.

Source: Zoning Object Map, Sheet 7, Draft SDCC CDP 2022-2028

In relation to the above lands proposed to be zoned, upon review, please note the following details:

- **Lands at Tootenhill (northern land parcel marked "Z")**

These lands were rezoned "RES-N" for the current County Development Plan, 2016-2022 but have yet to be subject of a planning application for development of any kind.

- **Lands at Tootenhill (southern land parcel, marked "Y"), in ownership of our client, Cavan Developments**

These lands were rezoned "RES-N" for the current County Development Plan, 2016-2022. Various planning applications have been made on these lands. Planning Reg. Ref. No. SD 18A/0424 refused permission on 04-02-2019 for 60 houses and 31 apartments. A subsequent application, Reg. Ref. No.

SD21A/0087 refused permission on 03-06-2021 for 51 no. houses and 37 no. apartments (88 no. units in total) on lands measuring 2.74 ha. This decision is subject of an appeal to An Bord Pleanála Reg. Ref. No. 310688-21

- **Lands at Tootenhill (adjacent Windmill Road and Killeel Road, marked “X” & “W”) in ownership of our client, Cavan Developments**

These lands were rezoned “RES-N” for the current County Development Plan, 2016-2022.

- **Lands at Killeel Road, Crockshane, south eastern parcel of land, marked “P” in Fig. 5 above.**

These lands were rezoned “RES-N” from the previous County Development Plans. South Dublin County Council refused permission for 321 no. dwellings, Reg. Ref. No. SD17A0040. Subsequent to this decision, planning permission was granted for 30 no. houses on an area of 0.96ha via Reg. Ref. No. SD18A/0242 & ABP-303572-19. As of yet, development has not commenced on these lands.

Land to the south of the centre of Rathcoole included in the Draft Plan are detailed below:

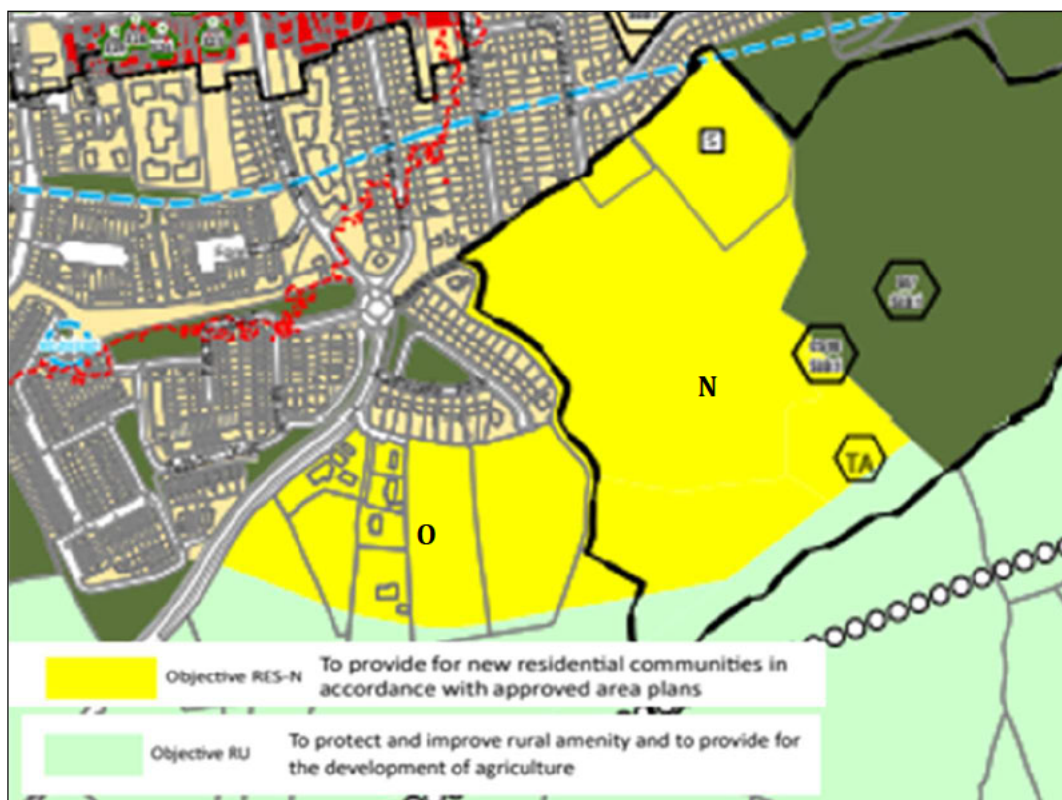


Fig 6: Parcels of lands to the south of Rathcoole with “RES-N” Zoning.

Source: Zoning Object Map, Sheet 8, Draft SDCC CDP 2022-2028

- **Lands at Stoney Hill Lane, marked “O” in Fig. 6**

These lands were rezoned “RES-N” from the previous County Development Plans. Planning permission in the form of a strategic housing development was granted by An Bord Pleanála via Reg. Ref. No. TA06S.307698 on 12-11-2020 for 204 residential units on 7.584ha. This development has yet to commence.



- **Lands south of Coolamber and west of Rathcoole Park, marked “N” in Fig. 6 – South Dublin County Council and Dept of Education and Skills**

These lands were rezoned “RES-N” from the previous County Development Plans. The lands are not subject to a planning application. These lands are subject to a specific local objective, CS10 SLO 1, which seeks to investigate the potential for alternative land uses for the lands currently zoned RES-N and OS as identified by the SLO on the CDP land use zoning map, having regard to protecting existing habitats, Biodiversity and the Rathcoole Woodlands, the need for social and affordable housing, community infrastructure and access.

It is our understanding that submissions have been made in support of this SLO from local groups in Rathcoole and Saggart and in particular, the rezoning for other purposes other than residential. Going forward, the SLO may hinder the making of planning applications for housing, thus possibly making the current zoning irrelevant. Therefore, now is the opportune time for rezoning to take place. Nonetheless, both the land capacity and the housing capacity should be deleted from projections set out in the Written Statement of the Development Plan in order to give a true picture of the capacity in hectares and unit numbers actually available in Rathcoole, should CS10 SLO 1 be implemented.

In addition to the above parcels of land, it is worth noting that there are approved developments on “RES-N” zoned land which have not commenced development, leading to shortage of units being delivered. The following sites have been granted permission, with the permission at Stoney Hill Lane being subject to judicial review proceedings.

Location	Number of Units Granted	Site Area
Kilteel Road	30	0.960 ha
Stoney Hill Lane	204	7.584 ha
Total	234	8.544 ha (Density 27.38 units per ha)

“RES-N” Zoned lands for Rathcoole			
Undeveloped Land and Housing Capacity			
Development Plan	Land Capacity (ha)	Housing Capacity	Density
2016-2022	45	1,062	23.6 units / ha
2022-2028	24.47	820	33.5 units / ha
Difference	20.53	242	N/A

The proposed consideration of alternative sites is supported by Paragraph 4.4.1 Land/Site Already Zoned of *Development Plans Guidelines for Planning Authorities Draft for Consultation (DofHLG&H)* August 2021, which states land zoned that has remained undeveloped and unserviced, through one or more development plans, with no prospect of being developed within the lifetime of the development plan this is under preparation approaches can be considered such as (i) alternative zoning objective or (ii) discontinue the zoning.

Following the above review, status update on the existing lands maintaining their respective ‘RES-N’ zoning objective and projected population information detailed above, it is submitted that the Council need to consider other suitable land, adjoining the Rathcoole settlement, adjoining existing and proposed transport networks, for rezoning for residential landuse to increase the County Development Plan’s housing yield target for Rathcoole and reducing / removing the existing shortfall in available zoned residential land in the village and surrounding area.

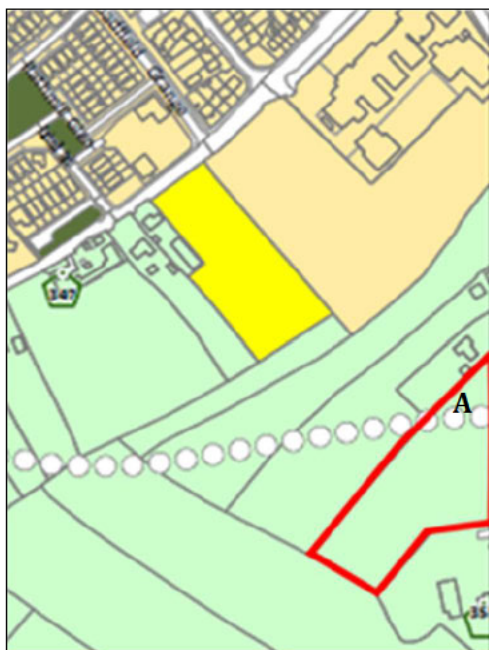


4.0 Proposed Amendment to Draft Plan

4.1 Proposal No. 1

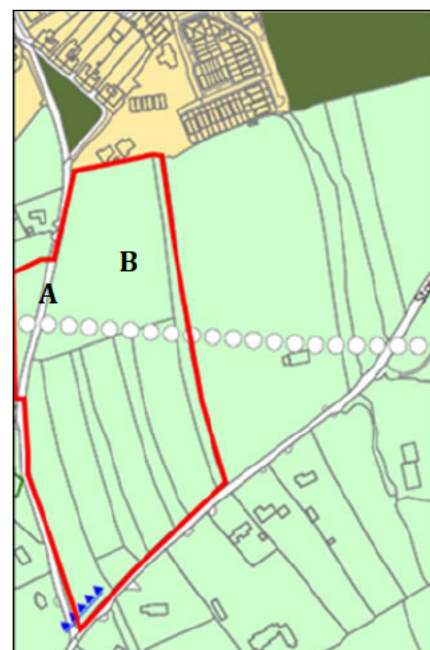
Rezoning of “RU” zoned lands to “RES-N” zoned lands at Green Lane, Rathcoole to compensate for the constraints prevailing to lands currently zoned “RES-N” at Tootenhill, Rathcoole in tandem with the loss of capacity arising from the rezoning of “RES-N” zoned lands to “RU” zoned lands

As noted above, Cavan Developments are the owners of lands at the eastern side of Green Lane, Rathcoole, immediate south of a newly developed residential estate, refer to Fig. 8 below. The lands are located north and south of the proposed Western Dublin Orbital Route (WDOR). This request for re-zoning refers to the lands north of the proposed WDOR only, marked “A” and “B” below.



Sheet 7

Fig 7: Lands owned by client West of Green Lane, Rathcoole
Source: Zoning Object Map, Sheet 7, Draft SDCC CDP 2022-2028



Sheet 8

Fig 8: Lands owned by client East of Green Lane, Rathcoole
Source: Zoning Object Map, Sheet 8, Draft SDCC CDP 2022-2028

The merits of the proposed re-zoning is grounded on the following:

- The constraints in the carrying out of residential development on lands at Tootenhill, Rathcoole thus reducing the housing capacity on the lands;
- The loss of “RES-N” zoned lands to “RU” zoned lands at Tootenhill, Rathcoole thus reducing the residential land capacity and housing capacity on the lands;
- The slow uptake in developing zoned lands in the area through one or more development plan cycle;



- The lands subject to this proposal adjoin an existing residential development to the north and will extend to its natural boundary i.e. the reservation for the proposed Western Dublin Orbital Route (WDOR);
- The site is located is within walking distance of the all the services available in Rathcoole, such as shops, schools, amenities etc.

In support of our client's request, we draw the Council's attention to paragraph 4.4.2 Land/Site Proposed to be Zoned of the *Development Plans Guidelines for Planning Authorities Draft for Consultation* (DofHLG&H) August 2021, which requires planning authorities to take into account the rate of take-up and built-out of zoned land over the preceding period of 6-10 years, when considering proposals for re-zoning. In this regard, we wish to highlight Cavan Developments' track record of building-out zoned lands in their ownership, whereas other landowners have not done so over the lifetime of one or more development plan cycles. Paragraph 4.4.2 clearly indicates '*that it is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development land*'. Should this land be rezoned, the planning authority can be assured that land will be developed within the lifetime of the new development plan.

Paragraph 4.4.3 Ensuring Sufficient Provision of Housing Land/Sites of *Development Plans Guidelines for Planning Authorities Draft for Consultation* (DofHLG&H) August 2021 recognises that in providing housing sites within settlements '*it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement*'. With respect to Rathcoole, it is pointed out above that there has been a lot of inactivity on several zoned parcels of land and if this trend continues the supply of new housing projections will not be delivered.

Paragraph 4.4.3 also refers to the necessity to '*additional sites/lands to ensure sufficient choice for development potential is safeguarded*'. *Housing for All - a New Housing Plan for Ireland* (DofHLG&H) September 2021, clearly sets out that there are not enough houses to buy or rent in the private sector. One of the main actions under the Housing for All Plan is the delivery of 33,000 new residential units per year, on average until 2030. Cavan Developments are willing to play their part in the delivery of new homes in the private sector, which will include the delivery of social and affordable homes as required under the Planning Acts. To do so, they need a continuous supply of zoned lands to be available to them into the future for the delivery of new homes. Having zoned land available will help them to retain the services of their workforce, which are hard to keep in continuous employment, due to the slow moving nature of the planning system.

51% of sites within South Dublin with planning permission for residential development were not commenced over the period between 2016 and 2020. While there are a range of factors contributing to this high figure, the fact that some sites have extended over a period of more than one development plan cycle would indicate a degree of land hoarding of which Cavan Developments cannot be accused. Should this trend continue, then the projected housing targets will not be achieved which confirms the need for additional lands to be rezoned in excess of the projected requirements. Existing undeveloped residential zoned lands in Rathcoole because of ownership and other reasons are not available to Cavan Developments. For our client to extend their house building capacity into the future in Rathcoole, they require additional lands in their ownership to be rezoned and adjustments made to the route of the proposed Western Dublin Orbital Route to achieve more efficiencies in density.



The carrying out of development on this land will result in Green Lane being widened along the length road frontage as far as the proposed Western Dublin Orbital Route, thus providing another safe route into and out of Rathcoole to the benefit of all road users via the proposed roundabout on the Johnstown Road along the proposed new road towards the N7. This will alleviate the volume of traffic through Rathcoole village.

4.2 Proposal No. 2

4.2.1 Construction of a new road as a replacement to Whitehouse lane from the N7 junction to a proposed roundabout at Johnstown Road. This road will be constructed along the line of the WDOR and lands for the reservation of the WDOR will be preserved on Cavan Developments lands. The above will facilitate the future construction of the proposed WDOR

Cavan Developments, in achieving the requirements of this submission under the two proposals are willing to construct part of the proposed Western Dublin Orbital Route at Tootenhill, Rathcoole as a local road. Following consultation with Roads Department SDCC with a 2m wide footpath on the residential side of the road and/or to a specification or requirement of SDCC.

These works will include the provision of a roundabout at Johnstown Road. In addition, Cavan Developments will construct a similar width road linking the proposed roundabout to the existing Johnstown Road to the north (towards Rathcoole) and to the south (towards Killeel). The northern part of the new connection to Johnstown Road will facilitate a proposed bus layby, bus terminus and proposed controlled Toucan crossing for the safety of bus passengers. This will enable the extension of Bus Route 69 from its present location on Johnstown Road to further south facilitating the existing and proposed residential developments. The roundabout will also facilitate the turning of the bus for the city inward bound journey. The existing white house lane will be cul de sac 'ed in proximity with Windmill Road. Please refer to the attached Drawing number P210802-PIN-XX-DR-D-0001-SI prepared by Pinnacle Construction Engineers. Land will be reserved for the provision of the WDOR on Cavan Developments' lands. It is our understanding that the proposed WDOR has not been constructed to date due to a lack of funding.

TM4 SLO of the 2016-2022 Development Plan requires "*RES-N*" lands at Tootenhill to accommodate the required reservation for the proposed WDOR, this Specific Local Objective is not in the Draft 2022-2028 Development Plan. The draft CDP upgraded the proposed WDOR to a 6-year road proposal from a long-term road proposal. Both the current CDP and the Draft CDP do not require developers to construct the proposed WDOR.

The provision of the proposed new road will facilitate other road users and not just local traffic and will be in receipt of national funding, which is not available at this time. Cavan Developments are willing to cover the cost of the above section of the road subject to a waiver of financial contributions, conditioned in future grants of planning permission in the administrative area of South Dublin County Council.

The construction of the above section of the proposed new road will allow for:

- Secondary access to the proposed development under Reg. Ref. No. SD18A/00087, benefiting the existing adjoining residential estates Rathmill Manor and Broadfield Manor. Thus, providing for more permeable interconnecting routes within the development which are easy to navigate,
- Additional existing zones "*RES-N*" land located nearest the N7 to be developed and
- An upgraded access in and out of Rathcoole, thus relieving traffic congestion in Rathcoole.



4.2.2 Constraints

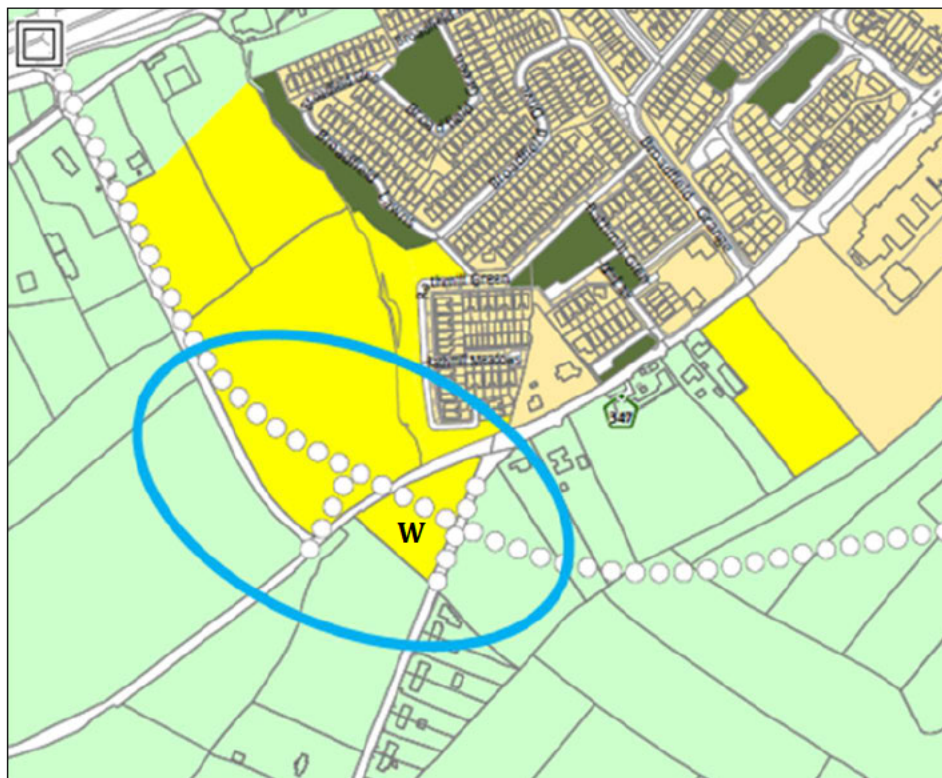
There are a number of constraints to existing zoned lands at Tootenhill, as follows:

- Shape and size of each plot located on the rural side of the WDOR
- Location at the edge of a small town in transition to a rural area with SDCC seeking to apply a density of 15-20 units per hectare under Reg Ref No. Sd21A/0087
- 2 No. Watermain Wayleaves
- Overground High Tension ESB Cables
- Reservation for the proposed WDOR
- The stream running from north to south through the zoned land and the 15metre set back from the top of the bank required for Riparian Strip by SDCC.

The above constraints will not yield the stated unit numbers capacity in the written statement of the draft Development Plan.

4.2.3 Proposed Rezoning from “RES-N” to “RU” zoned lands

Cavan Developments Ltd are willing to have Plots “X” and “W” indicated on Fig. 10 below to be rezoned from “RES-N” to “RU” zoned lands. These lands are on the rural side of the proposed WDOR, which would appear to be the most appropriate land use zoning. The configuration and area of the small plots do not lend themselves suitable for the layout of residential units thus their zoning potential cannot as such be fully achieved and accordingly, their capacity should be removed from the Development Plan as it distorts the true position. This rezoning is subject to Cavan Developments achieving the sought for rezoning at Green Lane.



**Fig 10: Proposed that and Marked “X” & “W” to be rezoned from “RES-N” to “RU” zoned lands
WDOR circled in Blue**

Source: Zoning Object Map, Sheet 7, Draft SDCC CDP 2022-2028



5. Conclusion

Table 9 of the current Draft Plan details the capacity of undeveloped lands within South Dublin and indicates that Rathcoole has a zoned land capacity of 24.47 hectares and a housing capacity of 820 no. units, equating to an average of 33.5 units per hectare. Whereas, within the overall county, the land capacity is 1,039 and a housing capacity of 44,472 units per hectare, equating an average of 43 units per hectare.

Contrary to the above, with regards to application Reg. Ref. No. SD21A/0087, SDCC sought to impose an *'edge of small town'* density of 15-20 units per hectare on lands at Tootenhill. Most of the remaining undeveloped zoned lands in Rathcoole could also be considered as being *'edge of small town'*, thus leading to a possible shortfall on the protected housing targets for Rathcoole, not to mention not complying with the guidance of the 2009 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas which discourages net densities of residential development of *"less than 30 dwellings per hectare"*.

The projected housing targets in Rathcoole could also fall short if:

- CS10 SLO 1 is implemented and an alternative land use is introduced

And

- Zoned lands since at least 2004 continue to remain vacant.

Mr. Peter Burke T.D. Minister of State at the Department of Housing, Local Government and Heritage, in an article in the Sunday Independent dated 11th July 2021, stated that most local authorities must increase their housing stock over the next six years by providing enough land to do so. In the case of SDCC, a 63% increase in housing delivery is required to meet estimated housing supply in the County Development Plan. Cavan Developments have been delivering housing in Rathcoole since circa 2000 on lands once made available by way of rezoning, whereas other developers have left their lands vacant since at least 2004.

While it is stated under Chapter 2 of the current Draft Plan, that there is sufficient zoned lands in the county to serve the needs of population and housing targets set by Ministerial Guidelines, it would appear that Rathcoole, as it progresses from a small town to a self-sustaining growth town, will fall short of its share of housing targets, if residential zoned lands become zoned for an alternative land use and/or there are constraints giving rise to low density.

This submission is not a blanket request for rezoning per se but a request for rezoning in tandem with de-zoning and adjustments to existing residentially zoned land, from a developer with a proven track record of developing residentially zoned lands as they become available in Rathcoole and who is offering to carry out essential road works to facilitate access in and out of Rathcoole. The above amendments will ensure that constraints in one area in Rathcoole will be overcome by the provision of additional zoning in another area of Rathcoole, thus ensuring sufficient lands are available to meet the supply targets identified. The amendments will contribute to the proper planning and sustainable development of Rathcoole.

Cavan Developments are a McKiernan family house building construction company, with the principals of the firm residing in Rathcoole. They are unique in that they have been building houses in the County of Dublin on a continual basis for over forty years. They are not land speculators and the record in South Dublin will show that they engage in the process of the making of planning applications on zoned lands in their ownership at the first available opportunity and once permission is granted, they commence the carrying out of the approved development. Accordingly, South Dublin County Council are requested to accede to their above proposals set out in this submission so that they can continue to supply much



needed new homes.

In the interest of clarity, Cavan Developments are proposing to build the above mentioned proposed new road, to have an appropriate zoning on the rural side of the WDOR to be rezoning from Residential to Agriculture subject to rezoning of their lands at Green Lane, Rathcoole. The above proposals will generate an additional route in and out of Rathcoole to the benefit of all other road users.

We hope that the South Dublin County Council takes on board the requests made above and to incorporate same into the adoption of the South Dublin County Development Plan 2022-2028.

Yours faithfully,

Bryan Meredith
Planning Consultant
Armstrong Fenton Associates

