

James McInerney Planning Consultant

**Planning Department
South Dublin County Council
Civic Offices
Town Centre
Tallaght
Dublin 24**

15th September 2021

RE: Stage 2 SDCC Draft Development Plan 2022-2028

Dear Sir/Madam

I attach the following submissions for Stage 2 SDCC Draft Development Plan

- 1. Chapter 11 Infrastructure & Environmental Quality**
- 2. Chapter 6.9 Rural Housing Strategy**
- 3. Re-zoning Submission Newcastle, Co. Dublin 08-sheet_Map 07**

Yours faithfully



**James McInerney
Planning Consultant**

SOUTH DUBLIN COUNTY COUNCIL

15 SEP 2021

PLANNING DEPARTMENT

Chapter 11 Infrastructure & Environmental Quality

SDCC are aware of flooding problems in Newcastle, in particular to flooding of lands at the Old Glebe, Main Street, which is a protected structure. The flooding arises from two sources.

- (i) Surface water and groundwater entering the fresh water supply to the ornamental fish pond and
- (ii) The discharge of surface water and groundwater from new developments into an open ditch at the rear of the Old Glebe, resulting in the overflow from the ornamental pond being backed up in heavy rainfall.

SDCC are approaching the issue with short, medium and long term solutions which is not satisfactory. It would appear that no proper solution will be put in place until such time as the proposed commissioning consultants to be engaged to carry out an assessment of the management of surface water and groundwater in Newcastle, have reported. This was to be done in 2020 and has not been done to date. In the meantime, planning permissions are continuing to be granted with discharge of surface water and ground water to the ditch at the rear of The Old Glebe. The increase in water discharge from new developments will during heavy rain falls add to the flooding concerns.

SDCC as an interim solution in the immediate past required developer to provide underground attenuation tanks, which was contrary Chapter 7, IE Objective 5 of Infrastructure & Environment Quality (IE) Policy 2 Surface Water & Groundwater of current Development Plan which states:

To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.

The above objective is proposed in Chapter 11 Infrastructure and Environment Services of the Draft Development to read as IE3 Objective 2 to read as:

To maintain and enhance existing surface water drainage systems in the County and to require Sustainable urban Drainage Systems (SuDS) in new development in accordance with objectives set out in section 4.3.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

This submission proposed that the words "avoid the use of underground attenuation and storage tanks" be added of the new Objective and that a SLO Objective be added as follows:

No further surface water and ground water will be allowed discharge into the existing culvert at the rear of The Old Glebe Newcastle until such time as a long term solution has been implemented following the recommendations of the report into the management of surfacewater and ground water in Newcastle.

In the event, that the above amendments are not acceptable to SDCC, then it is requested that at least the new Development Plan recognises the current issues that affect The Old Glebe and that appropriate objectives be inserted so that new developments in the area do not contribute to flooding and pollution of the Ornamental Fish Pond. Attenuation tanks are not the solution and therefore SDCC should not permit them and should require developers to provide more sustainable urban solutions.

Flooding at The Old Glebe has been ongoing for over 20 years, and as yet SDCC has not provided a long term solution. SDCC have allowed Newcastle Village to expand into a Self-Sustaining Growth Town without putting infrastructure in place to cope with the additional volumes of surfacewater and ground water to be disposed of. The new Development Plan should recognise the problem and provide a solution.

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