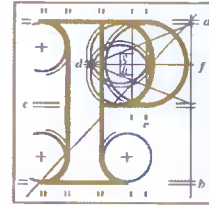


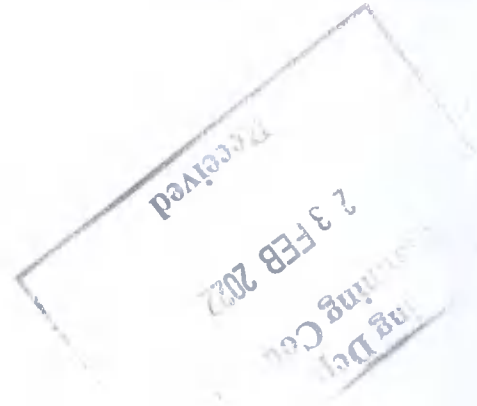
Our Case Number: ABP-312579-22

Planning Authority Reference Number: SD21A/0044



**An
Bord
Pleanála**

South Dublin County Council
Planning Department
County Hall
Tallaght
Dublin 24



Date: 22 February 2022

Re: Construction of clubhouse and associated site works.
Treepark Road, Kilnamanagh, Dublin 24

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer to the above mentioned appeal.

The Board is of the opinion that, in the particular circumstances of this appeal, it is appropriate in the interests of justice to request you to make submissions or observations in relation to the enclosed submission received on 11th February, 2022 from Kilnamanagh AFC.

In accordance with section 131 of the Planning and Development Act, 2000, (as amended), you are requested to make any submissions or observations that you may have in relation to this enclosure **on or before 14th March, 2022**. The Board cannot consider comments that are outside the scope of the matter in question. Your submission in response to this notice must be received by the Board not later than **5:30pm on the date specified above**.

If no submission or observation is received before the end of the specified period, the Board will proceed to determine the appeal without further notice to you, in accordance with section 133 of the 2000 Act.

Please quote the above appeal reference number in any further correspondence.

Yours faithfully,

Mary Tucker
Executive Officer
Direct Line: 01-8737132

BP70 Registered Post

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
11 FEB 2022	
Fee: €	_____ Type: _____
Time:	13.41 By: hand

ABP Ref: ABP-312579-22
SDCC Reg Ref: SD21A/0044
Reference: Kilnamanagh AFC

7th February 2022

Location: Treepark Road, Kilnamanagh, Dublin 24

Proposal: Construction of a new two storey clubhouse (658m²), new external activity area (405m²), new boundary fencing for external activity area and all associated site works adjacent to existing all weather pitch at Treepark Road, Kilnamanagh.

Dear Liam,

Thank you for your notification letter regarding the recently lodged appeal against SDCC planning decision (Reg Ref SD21A/0044). In response to this appeal, Kilnamanagh AFC have prepared a number of site layout drawings to demonstrate the intention behind the 70no. parking spaces identified in application SD21A/0044 and a possible modification to the proposed layout for consideration.

Please see the first site layout drawing attached named *L(11)_ABP Site Layout - Current Car Park Layout - February 2022*. This site layout drawing is an as-built survey drawing of the car park.

Indicated on the drawing are permitted as built developments namely:

- Kilnamanagh Family Resource Centre (**KFRC**) Community Centre (Reg Ref S99A/0227) and
- Kilnamanagh AFC (**KAFC**) All Weather Pitch (SD17A/0048)

Indicated also is the location of the proposed KAFC Clubhouse, existing building access/egress points, existing Recycle Centre and existing Bin Storage locations, existing trees/planting and existing ancillary structures belonging to KFRC. This drawing is included in this submission for clarity of location and reference.

Please see the next site layout drawing attached named *L(12)_ABP Site Layout - Permitted Car Park Layout (SD07A/0463)*. During a previous planning application to SDCC (Reg Ref SD07A/0463), Kilnamanagh AFC indicated on Site Plan Drawing SD-01 (attached), an existing Community Centre Car Park (Granted in KFRC Application Reg Ref S99A/0227 & S99A/0227 EP). During this (2007) application process and by way of a Further Information Request, KAFC indicated the existing car park layout on Car Park Layout Drawing SDRFI-06. This layout indicates 95no. spaces. Drawing *L(12)_ABP Site Layout - Permitted Car Park Layout (SD07A/0463)* indicates the location of said 95no. spaces. During the planning process (SD21A/0044) KAFC were requested to submit a parking layout along with new bicycle stores and increased width footpaths. The first reference point explored in designing the car park layout was the previously approved car park layout. It is clear on the first site layout drawing L(11) as part of this submission that the previously approved car park layout has not been constructed on site.

The demonstration carried out on Drawing *L(12)_ABP Site Layout - Permitted Car Park Layout* shows that KAFC could not implement the previously approved car park layout (Reg Ref S99A/0227 & S99A/0227 EP) for the following reasons:

- Spaces located directly at and adjacent to building access/egress points
- Location of Recycle Centre and Bin Stores

- Spaces located where planting and mature trees exist, a point to note is that SDCC attached a condition to the Notice of Decision to Grant permission (SD21A/0044):

8. Tree Bond: A maximum of two weeks from the date of Commencement Notice within the meaning of Part II of the Building Control Regulations 1997 and prior to the commencement of any works on site, a Bond or bank draft to the value of €5,000 shall be lodged with the Planning Authority as a security for the protection and retention of the existing trees to be retained within the subject site during the course of the development works. The release of the bond will be considered a minimum 12 months after the completion of all site works, at the discretion of the Landscape/Public Realm Section. This will involve assessment of whether the trees specified for retention have been preserved in their prior condition and have suffered no damage and the developer has complied with the requirements of the Planning Authority in relation to tree protection.

There are approximately 20no. spaces from the previously approved layout of 95no. spaces impacted by the current arrangement of the car park area.

Please see the next site layout drawing attached named *L(13)ABP Site Layout - Proposed Car Park Layout as per Reg Ref: SD21A/0044* which indicates 65no. parking spaces and 5no. parking spaces for Mobility Impaired Users. This is 5no. spaces shy of the number of buildable parking spaces; it should be noted that the layout on drawing L(13) is quite similar to the natural parking habits of the car park users. This similarity will be further demonstrated as part of KAFC's response to SDCC Condition:

5. Roads: (a) Within 6 months of operation, a Mobility Management Plan shall be submitted to the Planning Authority for written agreement showing the mode of travel used by people arriving and leaving the development (car, walking and public transport, the number and time periods for car drop-offs and pick-ups of match fixtures etc.).

The car parking layout shown on drawing L(13) was accepted by SDCC Planning Department as having adequate parking spaces, demonstrating sufficient connectivity throughout the site, sufficiently wide footpaths for Mobility Impaired Users as well as providing more than the minimum number of required covered bicycle parks (32no. provided) The suggestion and conjecture within the appeal that the car park layout was submitted for expediency of the process is inaccurate as demonstrated so far within this submission.

Two points to be noted for the record and for consideration:

- If the Additional Information Request by SDCC was treated in a frivolous manner by KAFC as noted by KFRC citing expediency to overcome the requests made, the Additional Information Response would in all likelihood have been submitted much sooner than the last applicable day. The reality is that KAFC diligently engaged with all of SDCC requests in a positive and correct manner for six months and at a large financial cost to the club. The result of this engagement being that SDCC issued Notice of Decision to grant planning permission based on the Additional Information Responses. This application process would not have been possible to progress this far without the overwhelming support that KAFC has received from the local Kilnamanagh, and the wider Tallaght community over the last twelve months.
- KAFC cannot be implicated as responsible for a typographical error in SDCC correspondence, referring the terminology used by SDCC to describe the Community Centre. KAFC, as a long standing neighbouring organisation is disappointed at KFRC's reference to suggest KAFC attempted a 'disingenuous' attempt to claim 67no. parking spaces. This comment is inaccurate and also quite unnecessary.

Please see the final site layout drawing attached named *L(14)_ABP_Site Layout - Modified Parking Spaces & Possible future development*. In the interest of progress and proactivity, KAFC have reviewed

the approved car parking layout (Reg Ref SD21A/0044) with a view to increasing the number of parking spaces. These modifications can be seen in **Red Hatch** on Drawing L(14). The number of parking spaces can be increased to 79no. with minor re-arrangement and with no impact on the comfort or enjoyment of the Community Centre users. The possible modifications are still very much aligned with the natural parking habits of the car park users. The 79no. spaces represents an increase of 4no. spaces over the number of 'buildable spaces' from the previously approved parking layout (Reg Ref S99A/0227 & S99A/0227 EP).

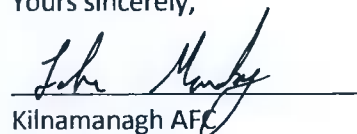
During a meeting between KFRC and KAFC, KAFC agreed to review the area immediately south of the proposed clubhouse building at KFRC's request, as a possible location for additional parking. This review is indicated within the **Magenta Dashed Line** of site layout drawing L(14). An additional 20no. spaces could be constructed in this area. Having carried out a high-level review of the scale of work involved, KAFC believe there would be significant earthworks required in order to address topographical levels, road build ups, surface finishes, attenuation management etc. There would also likely be site works required by Irish Water relating to below ground drainage and access points. Given the area in question (0.1152ha) and financial inevitabilities associated with undertaking these works, it is KAFC's opinion that should this area be conditioned to KAFC's sole remit for providing additional parking spaces, the Clubhouse project in its entirety would become financially impossible and subsequently not feasible to proceed in the short to medium term.

Two final points for consideration are:

- KFRC note the approved parking layout (Reg Ref SD21A/0044) 'will adversely impact on the centre and on any potential future plans we may have for expansion.' KAFC will note that the proposed clubhouse is not intended to impact negatively on KFRC or any other organisation in the community. The reality is quite the opposite, KAFC see this facility as a positive addition for the sole benefit, athletic development and enjoyment of the children in the community, nothing further. KAFC are disappointed that the single aspect of this appeal hinges on car parking for potential future plans to expand the Bar/Lounge area as outlined to KAFC by KFRC. KAFC believes that its members and users, over 400 of them are younger than 16 years old, should not be deprived of a dedicated football facility based on this reason.
- KFRC note on street parking during busy periods is causing traffic congestion. This statement is correct, as it is correct too for the national schools in the community and also the streets in proximity to Luas/Transport routes. During busy periods directly associated with football activities, KAFC implement a traffic management plan to safely deliver people (members and public) from one side of the street to the other by way of informal parking exclusion zones and constant supervision. On street parking is an existing occurrence at multiple locations throughout Kilnamanagh, regardless of whether or not the proposed clubhouse is constructed and as such should not be considered a planning matter relative to Reg Ref SD21A/0049.

Thank you for your time in reviewing this submission. If there are any clarifications or further information required, please don't hesitate to contact me. I look forward to hearing from you and am hopeful for a favourable decision based on the information supplied.

Yours sincerely,



Kilnamanagh AFC
c/o Mr. John Murphy

NOTES:
 Figured dimensions only to be taken from drawings.
 All dimensions to be checked on site before work commences.
 All drainage to be constructed to engineers specification.
 These drawings are for planning purposes only.

LEGEND

CONTOURS TAKEN AT 500mm INTERVALS AND INDICATED AS: 94.9

LEVELS RELATIVE TO T.B.M. OF 100.0 INDICATED AS:

HEDGES/TREES INDICATED AS:

E.S.B. Pole:

Masonry Wall:

12 Metre Lighting Column:

110mm Land Drain:

150mm Concrete Surface Water Pipe:

Surface Water Manhole:

Training Area:



PROPOSED LAYOUT OF ALL WEATHER FOOTBALL PITCH.
 SCALE: 1 : 500

REVISION	BY	COMMENTS

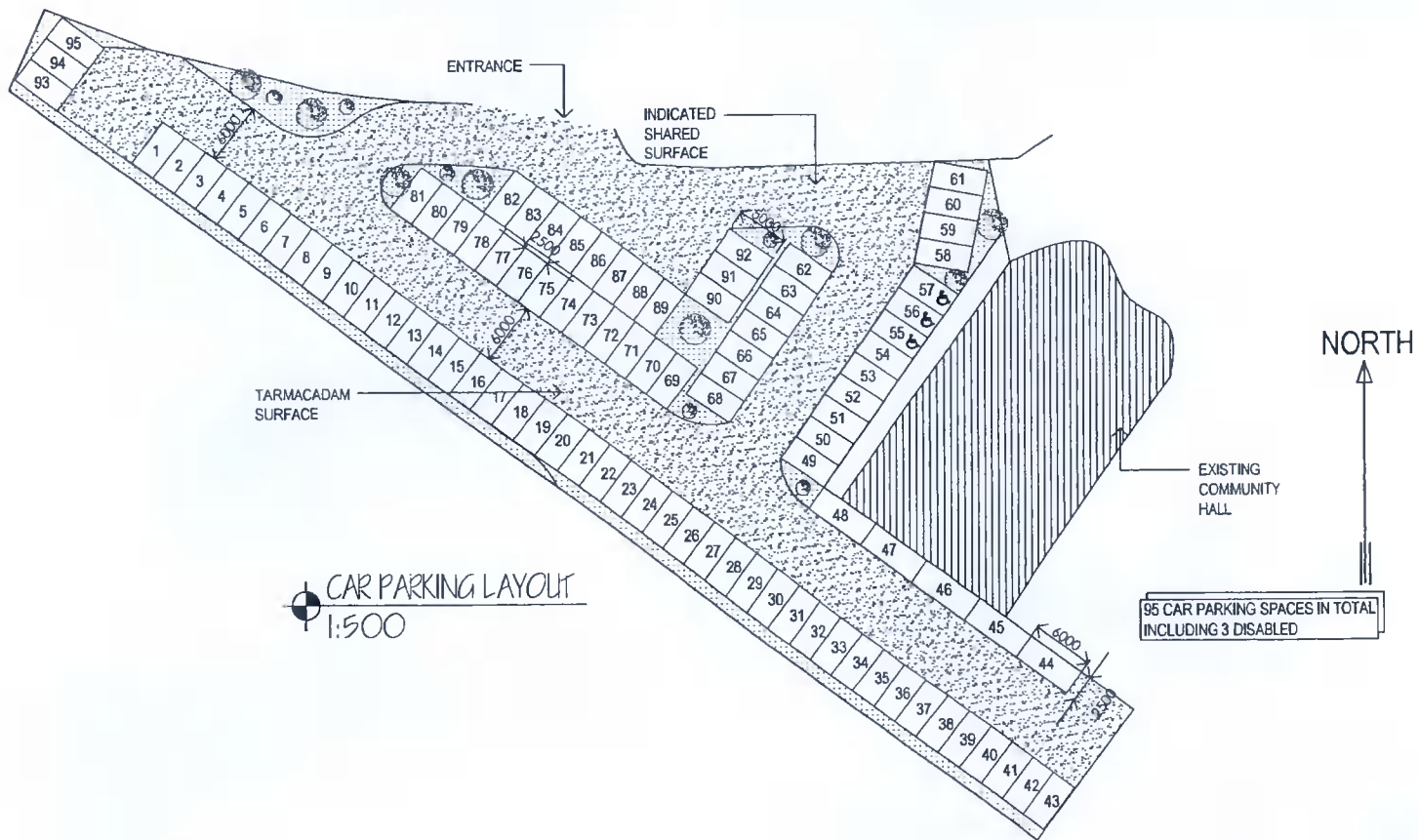
SportWorks
 West Curragh, Naui, tel: 01-8413281
 Co.Dublin. fax: 01-8413140

TITLE	LAYOUT	SCALE	1: 500
DATE	MAY 2007	DRAWN BY	JPE/B.M.
DWG REF	SD-01	CLIENT	KILNAMANAGH A.F.C.

JOB REF: KILNAMANAGH

DRAWING NO: 1 CHECKED BY:

SOUTH DUBLIN COUNTY COURSE & PLAYERS DEVELOPMENT REGISTRY
 19 JUN 2007 A 0400
 Date Registered: Regular Reference



CAR PARKING LAYOUT
1:500

95 CAR PARKING SPACES IN TOTAL
INCLUDING 3 DISABLED

SD07A/0463
A.I.
26/SEP/07

REVISION	BY	COMMENTS



TITLE	SCALE	AS NOTED
SECURITY FOR THE NEW INFORMATION CAR PARKING LAYOUT		
DATE: SEPTEMBER 2007	DRAWN BY: JPE/BM	
DRAWN BY: JPE/BM	CLIENT: KILNAMANAGH A.F.C.	

JOB REF: KILNAMANAGH	
DRAWING NO: 4	CHECKED BY: B.M.