

South Dublin County Council
An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
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PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Decision Order Number: 0617	Date of Decision: 16-May-2022
Register Reference: SD22A/0081	Registration Date: 21-Mar-2022

Applicant: Clondalkin Rugby Football Club Ltd.

Development: Relocation of the existing Clondalkin RFC grounds at Gordon Park to new lands at Kingswood Farm, Moneenalion Commons Lower Clondalkin and comprising of 4 new rugby playing pitches, including a high quality main competition pitch (with modern directional floodlighting comprising 18m high floodlighting columns either side) and a high quality Junior pitch both laid approximately level, and two back pitches as well as various grassed rugby training areas all laid on existing land cross fall levels; change of use of existing agricultural shed to accommodate new two storey changing facility and storage areas; a new two storey Clubhouse Pavilion with supporting facilities including dressing rooms, physio rooms, coffee dock, committee rooms, members bar and lounge, plantroom and toilets; all associated site development sustainability and infrastructure work including connection to existing public foul sewer, SUDs, sedum roof and PV roof panels; new landscaping throughout the site comprising trees, hedges and wild flower areas; new cycle track and pedestrian access and stairs off the R136, bicycle shelter, children's playground area, electrical car charging stations, vehicle parking and new vehicle entrance off the Old Country Roadway.

Location: Kingswood Farm, Moneenalion Commons Lower, Clondalkin, Dublin 22

Application Type: Permission

Dear Sir /Madam,

With reference to your planning application, received on 21-Mar-2022 in connection with the above, I wish to inform you that before the application can be considered under Section 33 of the Planning & Development Act 2000, six copies of the following ADDITIONAL INFORMATION must be submitted.

1. The applicant is requested to submit:
 - (1) details/drawing of proposed stairs specification (materials, finishes, hand railings, lighting, gate, gradients, etc).
 - (a) Plan drawing, section drawing and structural drawings (including rebar schedules where applicable).
 - (b) Preventive railing at top of stairs (Noting the 7m level difference between top and bottom).
 - (c) Confirmation in writing that permission has been granted from SDCC Development Department to create an entrance using council land.
 2. Further detail regarding proposed cycle track/entrance:
 - (a) Public lighting to be provided along any darkened sections of path, subject to consideration of ecological impacts.
 - (b) Confirmation in writing that permission has been granted from SDCC Development Department to create an entrance using council land.
 - (3) Further detail regarding the main entrance road (Country Lane's Road Traffic & Road Geometry) to include a text rationale explaining the traffic movements where the narrow lane widths (4.5m in places) occur.
 - (4) Swept path analysis (AutoTRAK) drawing demonstrating bus coach & emergency vehicle/bin truck movements through the site, including bus coach parking movements.
 - (5) a revised drawing showing:
 - (a) minimum 5 mobility impaired spaces
 - (b) minimum 10 EV charging point locations
 - (c) details of how all carpark spaces will be ducted/future-proofed for the introduction of EV charging equipment in the future.
 - (6) a Taking in Charge drawing showing any areas that are to be offered to the local authority for Taking in Charge.
2. (i) The applicant is requested to submit an updated ecological survey report, with surveying being undertaken in the appropriate season, which coincidentally is between April and September for plants and bats in particular. The bat survey is to be undertaken by a qualified and experienced bat expert, and is to address the potential for the presence of bat roosts and the general usage of the site by foraging and commuting bats. Any buildings or outhouses proposed for demolition or reuse must also be surveyed for bat roost potential. A more comprehensive baseline of the ecological resource will facilitate a more robust assessment of the potential impact from lighting as proposed in this development. Flood lighting, in particular, is detrimental to the activities of many bat species, and this potential impact needs to be identified and addressed where necessary.

(ii) The route of the Camac river also requires protection from any lighting proposals. Details of lighting and its potential impact on light sensitive species is required to be addressed at the earliest possible stage in the planning process, and not, as suggested in the ecological report, at the detailed design stage. A consideration of the need, location, intensity, and time of use of flood lighting is best considered early, so that amendments to drawings can be facilitated where necessary to protect bats and other sensitive habitats. Therefore the applicant is requested to submit information on detailed lighting designs and usage, so that an appropriate assessment of potential impacts on protected species and the Camac River can be undertaken.

3. (a) The applicant is requested to submit a comprehensive Tree and Hedgerow Report. This shall comprise a detailed Tree and Hedgerow Survey and Arboricultural Impact Assessment, Tree Constraints Plan, Tree Protection Plan and Arboricultural Method Statement, all in accordance with, BS 5837: 2012 Trees in relation to design, demolition and construction – recommendations. The report shall be carried out by an independent, qualified Arborist and shall include all of the following:
- (i) Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e. within falling distance thereof) shall be accurately plotted, tagged and shown on a scaled drawing of a topographical survey of the site
 - (ii) Tree Survey Schedule: a summary of the surveyed trees and hedges, giving a breakdown of their tag nos., species, size, age, condition and useful life expectancy
 - (iii) Arboricultural Impact Assessment: a thorough, detailed and realistic analysis and assessment of the likely impacts of the proposed development on the surveyed trees and hedges; along with a summary table of the tree population and quantification of impacts/losses etc. (total number surveyed and total numbers/percentage to be retained and felled respectively).
 - (iv) Design Iteration - Adjustments, Revisions to Proposed Site Layout: subsequent to and arising from the Impacts Assessment, the applicant's design team [especially arborist, consulting architect(s) and engineer(s)] shall demonstrate in their submission, that it has sufficiently explored and investigated layout alternatives, to achieve an optimal solution that meets South Dublin County Councils Tree Strategy and its Development Plan standards in respect of tree preservation and tree retentions, as appropriate.
 - (v) Tree Constraints Plan: a scaled site plan (1:500@A1) showing the impacts of all surveyed trees in relation to the site layout of the proposed development.
 - (vi) Tree Protection Plan: a scaled site plan (1:500@A1) of the proposed development, clearly showing and distinguishing (by colour coding) those trees and hedges to be retained and protected and those to be removed ; showing alignments of Tree Protection Fencing and areas to be excluded from construction activities and compound(s), site office(s), plant, equipment and materials storage. Root Protection Areas (RPAs') of all trees and hedgerows to be clearly shown on this drawing.
 - (vii) Arboricultural Method Statement: clear and practically-achievable measures to be used during the construction period, for the protection and management of all trees and hedges that are to be retained, as shown in the Tree Protection Plan.
 - (viii) Summary Table: Summary of all trees and hedgerow proposed for removal and retention to include numbers and percentages.
 - (ix) The applicant is requested to submit pictures of the existing trees/hedgerows subject to any tree protective fencing. This shall include a location map of where each picture was taken from.
 - (x) Trees and hedgerows within and within falling distance of the proposed development area to be

surveyed.

(xi) The report should indicate what is proposed to mitigate proposed removals and protect that which is to be retained.

(b) (Landscape /Blue-Green Infrastructure). There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide a fully detailed landscaping scheme for the proposed development.

(i) A fully detailed landscape plan with full works specification and a fully detailed planting plan that accords with the specifications and requirements of the Council's Public Realm Section. The

Landscape Masterplan should be to scale of not less than 1:500 showing –

(a) The species, variety, number, size and locations of all proposed planting

(b) Details of Hard landscape works, specifying surface material and furniture

(ii) Details of natural SuDS features including swales, permeable paving, green roofs and bioretention tree pits etc.

(iii) Detailed Sections and Elevations

(iv) Specifications for mounding, levelling, cultivation and other operation associated with plant and grass establishment

(v) A timescale for implementation

(vi) The applicant should propose for example, mitigation planting for proposed tree and hedgerow removal; protection of trees and hedgerows to be retained; proposals for planting along the banks (minimum 10m setback riparian zone) of the River Camac; enhancement of existing hedgerows; additional infill planting; creation of new habitat; integration of SuDS features into the landscape; boundary planting. There should be a net gain of trees and hedgerow.

(vii) Planting to be predominantly native and /or pollinator friendly species that support the local Bat population.

(viii) Existing green infrastructure links should be maintained.

(c) (Ecological Impact – Bat Survey). There are concerns with the lack of information submitted in relation to ecology given the rural nature of the site and presence existing trees and hedgerows. The applicant is requested to submit a full bat survey as recommended in the Ecological Impact Assessment dated 21st December 2021.

(d) (SUDS). There is insufficient detail for SuDS (Sustainable Drainage System) shown for the proposed development. Further natural SUDS features should be considered to be incorporated into the proposed drainage system and a strategy provided. The SUDS should be considered to be an integrated multi-disciplinary approach which locally addresses water quality, water quantity, and provides for amenity and biodiversity enhancement which meets the objectives of South Dublin County Council Development Plan 2016-2022. A comprehensive SUDS Management Plan should be submitted to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan shall also be included as a demonstration of how the system will function following implementation. In addition, the applicant should provide the following:

- The applicant is requested to show further proposed SuDS features for the development such as Green roofs, grass areas, bioretention tree pits, channel rills, swales, permeable paving and other such SuDS and show what attenuation capacity is provided by such SuDS. Demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design for the proposed development.

The applicant is referred to the recently published SDCC Sustainable Drainage Explanatory Design and Evaluation Guide for further information and guidance.

(d) (Camac River - Riparian Zone/Set back). The applicant is advised that the Public Realm Section has some concerns in relation to the impact of the proposed development on biodiversity, in particular, the set back from the river and loss of existing hedgerows. In this context the applicant is requested to submit the following:

(i) A re-designed site layout plan showing the proposed pitches set back a minimum of 10m from the top bank of the Camac River as per Green Infrastructure G3 Objective 2 of the South Dublin County Development Plan 2016-2022. The River Camac to be clearly shown on design drawings.

(ii) Site specific riparian planting proposals along the riverbank in order to enhance and protect the Green/Blue infrastructure of the site and to provide biodiversity and habitat enhancement measures.

(e) The Public Realm Section has concerns about the lack of information in relation to the impact of the development on existing trees and hedgerows; bats; the River Camac, landscape proposals and SuDS.

The Public Realm Section is requesting that the applicant provide significant additional information such that the sustainability of the development can be assessed for compliance with the policies and objectives of the County Development Plan.

4. (a) The application includes the provision of a Member s Bar. For 'RU' zoning a public house which is defined as 'A building or part thereof or land licensed for the sale of intoxicating liquor to the public for consumption on the premises', is Open For Consideration but only in Villages to serve local needs. The proposal does not include a justification for the Members Bar in the information submitted to the Planning Authority. Therefore the applicant is requested to submit information demonstrating a clear justification for the Member Bar.
(b) There does not appear to be one single drawing showing the entire proposed development. However, the site is shown in small parts at an enlarged scale. The applicant is requested to submit such a drawing.
5. (a) The applicant is requested to submit information to clarify if the spill light from the pitch lighting extends beyond the pitch onto the N7 (Naas Road) slip which would cause a glare issue to traffic. The applicant is requested to superimpose pitch spill lighting calculations onto the layout drawings submitted.
(b) The applicant is requested to liaise with the Department of Defence regarding their requirements for the proposal.

NOTE: The applicant should note that any submission made in response to the above will be examined and MAY be deemed to be SIGNIFICANT ADDITIONAL INFORMATION by the Planning Authority. In this event the applicant(s) will be subsequently notified and requested to publish a notice in an approved newspaper and erect or fix a site notice on the land or structure to which the further information relates and to submit copies of the both the newspaper and site notices to the Planning Authority in accordance with Article 35 (1) (a) and (b) of the Planning and Development Regulations 2001 (as amended).

Note: The applicant must submit the Further Information within **6 months** of the **date of decision**. If the information is not received within this period the planning authority shall declare the application to be withdrawn.

Please ensure that your reply to this Request for Additional Information is accompanied by a covering letter marked “ADDITIONAL INFORMATION” and that the Planning Register Reference Number given above is quoted on the covering letter.

Signed on behalf of South Dublin County Council

Register Reference: SD22A/0081

Date: 17-May-2022

Yours faithfully,



for Senior Planner