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Planning Department
South Dublin County Council
County Hall
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Our Ref. SC04/21020

30th August 2022

ADDITIONAL INFORMATION

REGISTER REF.: SD22A/0081

LOCATION: Kingswood Farm, Moneenalion Common Lower, Kingswood, Dublin 22

APPLICANT: Clondalkin Rugby Football Club Ltd

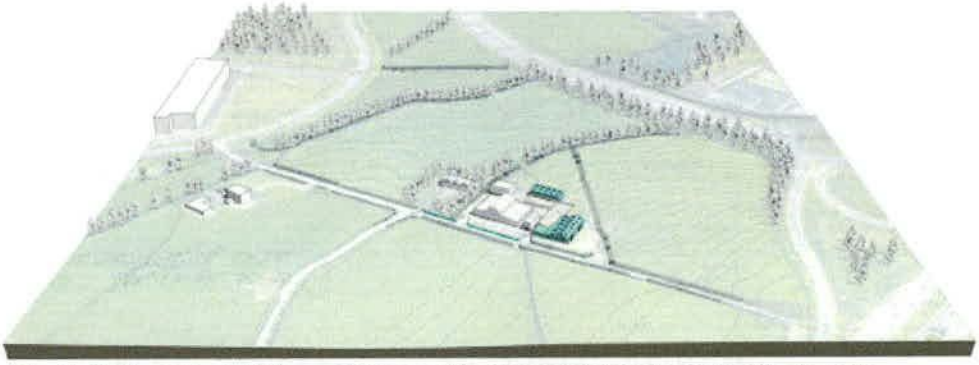


Fig.1: Virtual Aerial View of the subject lands/ terrain from the South

Dear Sirs

On behalf of our client, Clondalkin Rugby Football Club, we wish to respond to your letter dated 17th May 2022, requesting Additional Information (hereafter "AI") in respect of the proposed planning application under your register reference SD22A/0081 at Kingswood Farm, Moneenalion Common Lower, Kingswood, Dublin 22.

The AI request comprises 5 No. items which are essentially requests for additional information and/ or clarifications raised by the various SDCC Departments due to their concerns about various aspects of the proposed development. These include the Roads Section, the Parks Department, the Heritage Office and Environment, the Public Lighting Section, Planning and the Irish Aviation Authority. We note that there were no objections, subject to conditions, from the Water Services Section nor Irish Water.

We found some of the items requested to be quite complex in form and therefore, to simplify matters, we have broken down some of the AI request items into their constituent subsections, where this makes sense to us, and so that then we could respond directly to that point. On the other hand, in other instances, it made sense to just consider the item in its entirety.

To this end, we have labelled each part of the AI under its item number, or item number subsection as the case may be, then have proceeded by first quoting, verbatim, the portion of the AI request text under consideration before then directly responding to that particular section. Hopefully, this structure will best assist the reader and the various departments to more easily focus on the responses that relates to their particular concern.

In addition to this structure, and the comments contained herewith, a significant proportion of the substance of our response is contained within the essential supporting documents, drawings and specialist reports which are enclosed with this AI response submission. These supporting documents comprise the following:

- 6 No. copies each of the following drawings as described by Cummins & Voortman Ltd, Sustainable Architecture & Urban Designers:

	Layout ID	Layout Name	Published	Drawing Scales	Size
A.03.05.1 Site Plan & Entrances					
	A.03.05.1.1	Site Layout Plan / Landscaping Plan	☒	1:500	1189 / 841
	A.03.05.1.2	Cycle Site Access	☒	1:100	420 / 297
	A.03.05.1.3	Stairs Access 1/2	☒	1:500, 1:200	420 / 297
	A.03.05.1.4	Stairs Access 2/2	☒	1:100	420 / 297
A.03.05.2 Lighting					
	A.03.05.2.1	Light Spill Analysis	☒	1:1500	420 / 297
	A.03.05.2.2	Sections L1 & L2	☒	1:250	420 / 297
	A.03.05.2.3	Adjusted Light Spill Plan	☒	1:1500	420 / 297
	A.03.05.2.4	Wink Light Heatmap	☒		420 / 297
	A.03.05.2.5	Wink Light Spill zone	☒		420 / 297
A.03.05.3 Landscaping					
	A.03.05.3.1	Green Blue as existing	☒	1:2000	420 / 297
	A.03.05.3.2	Design Iterations	☒	1:4541.31	420 / 297
	A.03.05.3.3	G&B Plan - Diagrams	☒	1:4000	420 / 297
	A.03.05.3.4	G&B Plan - Proposed	☒	1:2000	420 / 297
	A.03.05.3.5	Gravel Paths & Swales	☒	1:20, 1:25	420 / 297
	A.03.05.3.6	Wildflower Meadow Riparian Zone	☒	1:25	420 / 297
	A.03.05.3.7	Trees & Shrubs Planting	☒	1:25	420 / 297
	A.03.05.3.8	Hedge Planting	☒	1:20	420 / 297
	A.03.05.3.9	Landscape Maintenance 1/2	☒		420 / 297
	A.03.05.3.10	Landscape Maintenance 2/2	☒		420 / 297
	A.03.05.3.11	Sustainable Building Systems	☒		420 / 297
A.03.05.4 Vehicle Tracking					
	A.03.05.4.1	Vehicular Tracking - Fire Tender	☒	1:500, 1:200	420 / 297
	A.03.05.4.2	Vehicular Tracking - Coach	☒	1:500, 1:200	420 / 297
	A.03.05.4.3	Vehicular Tracking - Car	☒	1:500, 1:200	420 / 297
	A.03.05.4.4	Vehicular Tracking - refuse	☒	1:500, 1:200	420 / 297

  All these drawings are included in a bound A3 size set, for ease of reference, except for Drawing No. A.03.05.1.1 which is included separately as it is plotted at A0 size.

- 6 No. Copies of the updated Ecological Impact Assessment Report Ref. PES_EcIA-21630 by Dr Ross Donnelly-Swift of Panther Environmental Services Ltd dated 08th August 2022, which is effectively an update to their previous Report Ref. PES_EcIA-21349 dated 9th December 2022. This updated report includes consideration of the findings, recommendations and conclusions of the other specialist involved including the Arborist, Bat Assessment and Lighting Reports referred to below and based upon this work they have liaised with the Architect providing specialist advice including recommendations for the treatment of the Riparian strip along the Camac River and for preferred native planting types that should be used throughout the site.
- 6 No. copies of the Arboricultural Assessment Report, dated 20th June 2022, by Arborist Ethan Gannon of VEON (Forestry, Ecology & Environmental) Ltd;
- 6 No. copies of A0 size Drawings (at scale 1/500) showing the 'Tree Constraints Plan' and 'Tree Protection Plan' for the site by VEON (Forestry, Ecology & Environmental) Ltd;
- 6 No. Copies of the Bat Assessment Report, dated 29th July 2022, prepared by Senior Ecologist & Bat Specialist, Daniel Connell, and Ecologist Molly Penzes of VEON (Forestry, Ecology & Environmental) Ltd;
- 6 No. Copies of a DIALux Lighting Calculation Report Ref. 22112 by *Wink Lighting Ltd*, dated 6th July 2022, including lighting 'Heatmaps' and Iso-Contour maps for the proposed bollard, pole and handrail lighting arrangements to light the bike track, paths, pedestrian access stairs, building, car park and vehicle entrance area off the Country Roadway. These calculations are supported by additional CalculuX Floodlighting calculations for the Main Competition Pitch, dated 30th June 2022; by the *Phillips* Lighting Application Specialist Team of flood lighting designer's, *Signify Energy UK*.
- 6 No. copies of the Lighting Calculation 'Heatmap' Drawing (at scale 1/1000) by Wink Lighting Ltd. This drawing is the same drawing included in the A3 set however it is included again here at A1 size, and scale 1:1000, to be better understandable to the reader. Refer to Drawing No. A.03.05.2.4.

As a first step in responding to the AI request received, we commissioned an extension to the topographical survey previously carried out in order to add more detail in the vicinity of the proposed pedestrian and cycleway access off the R136 as identified in Fig.2 below. These surveys were undertaken by the same surveyor, DMC Surveys Ltd, and are shown at 1:200 scale in Appendix A. Therefore, we now have an extended digital survey for the overall site, including these two areas, and we confirm that this is available to share the digital version of this drawing with SDCC for your information and records as we did previously.

These two additional areas basically include an approximately 35m long portion of the boundary with the R136, where the Pedestrian Stairs Access is proposed, and then another approximately 25m long portion of the boundary with the R136 where the Cycle Access Corridor is proposed to cross SDCC lands.

Fig. 2: Overall Site Plan & Access

With this structure and supporting documents introduced we shall now respond to each item of the AI request in turn as follows:

ITEM 1 – ROADS SECTION/ PARKING, ACCESS & TRAFFIC

ITEM 1: Subsection (1) of (5):

(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

RESPONSE:

The proposed Cycle Access Entrance is detailed in the A3 bound design set of drawings on Drawing No. A.03.05.1.2 where it is shown in Plan, Elevation, Section and Perspective View. This access is near level with the adjacent R136 Cycle Track and Footpath with a nice gentle fall into the site of approximately 1/30 or 3.3%. There is a small, grassed drainage ditch present between the edge of the R136 Footpath and the existing fence boundary at the top of the distributor road embankment. This ditch will need to be traversed here and so we proposed that it is piped locally and in accordance with current drainage design and detailing standards and Civil Engineering good practice. The handrail to the crossing is envisaged as a simple but robust timber railing to guard against the slight resulting change in level.

The Pedestrian Access Stairs, on the other hand, must overcome a more significant level difference which is indeed just over 7m vertically. The stairs are also detailed in the bound A3 design set, specifically on Drawing Nos. A.03.05.1.3 and A.03.05.1.4 where it is shown in Plan, Sections and Perspective Views. Details of finishes, hand railings, landings, areas of tactile pavement etc are included.

To achieve a safe pitch for the Pedestrian Access Stairs, the R136 embankment earthworks will need to be extended out slightly, and locally, in order to provide proper direct support on new compacted fill material for the proposed new reinforced concrete stair. This embankment extension will be done using stepped benches in strict accordance with Transport Infrastructure Ireland's (TII) Standard Construction Details ref. CC-SCD-00608 and a copy of this drawing is included in Appendix B for ease of reference. There will be a number of level landings between flights, including top and mid-level rest area landings. The stair flight structure will include a formed RC key at the base of each RC flight, to effectively fix them them in place.

At ground level on the CRFC site side there is an unlined drainage ditch feature at the toe of the embankment just outside the site boundary fence. With the local outward extension of the embankment this drainage feature will also need to be piped for the width of the extended embankment as shown on Drawing Nos. A.03.05.1.3 and A.03.05.1.4.

At this time, we think that structural design, reinforcement detailing and scheduling for the stairs structure *per se* is premature, especially as we are conscious that these access areas are outside of the site ownership and therefore inherently subject to agreement in relation to the final arrangement and aesthetic etc. However, in due course we confirm that this structural design will be done in strict accordance with the Structural Eurocodes, namely EN 1990: (EC0) *'Basis of Structural Design'*, EN 1991: (EC1) *'Actions on Structures'*, and EN1992: (EC2) *'Design of Concrete Structures'* and all other applicable codes of practice. Handrail design will be in accordance with EN1993: (EC3) *'Design of Steel Structures'*, and any concrete anchors used will designed and installed in accordance with the Health and Safety Authority's *Code of Practice for the Design and Installation of Anchors.*

While top and mid-level resting areas are proposed no actual gate is envisaged at this time. The reason for this is that the site has a large perimeter, and a gate would, in our opinion, be easily circumvented so as to be practically ineffectual.

Regarding Public Lighting the additional areas surveyed picked up the positions of the existing Public Lighting Poles (LP) present within the extent of the areas surveyed along the R136. With reference to these surveys in Appendix A we have deliberately made use of this already existing public infrastructure by positioning each Stair and Cycle Track entrance position close to these existing LP positions. This strategy will avoid the need for additional lighting on the R136 side while at the same time it minimises any potential disruption to existing Public Lighting services.

The Stairs and its landings will be fitted with stainless-steel guardrails and its handrail will include discrete integrated lights along its path. The Cycle Track access will have a timber handrail and standard bollard lighting at discrete positions along its entire Cycle Track route. Refer to the overall site Layout Drawing No. A.03.05.1.1 as well as Wink Lighting Report and associated Drawing No. A.03.05.1.4.

A letter of consent from the Development Department of South Dublin County Council, dated 27th March 2022, for both of the proposed new entrances is included in Appendix C along with an update of Drawing No. A.03.02.12 which is referred to in the letter. This drawing was included with the Planning Application and has only been updated with minor corrections as well as the addition of some notes with respect to the extent of SDCC *Taking-In-Charge* envisaged.

ITEM 1: Subsection (2) of (5):

> *(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.*

RESPONSE:

The *Design Manual for Urban and Streets* (DMUR) published by the Department for Transport, Tourism & Sport, recommends that the standard carriageway width is between 5 – 5.5m wide with corresponding lane widths of 2.5 – 2.75m. However, for Urban Local Streets where there is a shared surface carriageway and two-way traffic it is acceptable for this overall width to reduce to 4.8m. On this basis almost the entire laneway could be considered to qualify as a 'Local Street' as defined in the DMUR. That is, except for the highlighted portions of the lane approximately from Chainage 250m to the proposed new site entrance at Chainage 350m from the Baldonnell Road where the constraining width was measured as approximately 4.5m. Refer to Drawing No. CRFC-SC-TA-00-DR-C-2012-P12 submitted with the original planning application and where road widths are considered in detail.

However, the Country Lane in question does not exist in a built-up area and from both a historical and current usage perspective it is more properly classed as a Rural Roadway. The historical perspective is from when this road formed one side of the Kingswood Crossroads Junction on the N7, whereas at present it provides only local access for Kingswood Farm and some local businesses and residences in the immediate locality.

This local access is supported by the presence of a cul-de-sac road sign at the junction with the Baldonnell Rd as can be seen in Fig. Nos. 3 & 4.

As a Rural Road the Country Road in question is very similar to many rural roads and laneways that exist throughout the Irish countryside, however, by comparison with the whole range of Rural Roads out there, in our opinion, this Country Lane is very much one of the better ones. This is essentially due to the fact that it is relatively straight and level for the most part and has excellent sightlines, with over 250m from the proposed new entrance, up to the northwest towards the Baldonnell Road and in the other direction, a clear distance of approximately 100m to the corner of the laneway where it turns at the N7 boundary. We note in this regard that vehicle speeds would necessarily be low to navigate the tight bend at this side so there is plenty of time for observation and anticipation for vehicles entering or exiting at the proposed new club entrance.

Similarly for traffic coming from the Northwest (L2006 direction) there is plenty of time for all oncoming traffic to regulate their speed to traffic and the road conditions as any competent driver would do.

Fig. 3: View of Cul-de-Sac Road Signage at Country Lane Junction with Baldonnell Road L2006

Fig.4: View of Cul-de-Sac Road Signage at Country Roadway

From our own experience of travelling many different types of Country Roads, Lanes and Rural Roads throughout Ireland, including close to the major urban centre that is Dublin City, we have noted that sometimes there is only a shared surface carriageway of only 4m wide yet still, even at this reduced width car sized vehicles travelling in opposite directions can be relatively easily managed by competently driving to the conditions and traffic, regulating vehicle speed appropriately, showing respect for other road users and displaying common courtesy etc. For larger vehicles such as trucks, occasional articulated lorries and more typically the occasional agricultural tractor, with or without trailers and even sometimes very large farm machinery the situation is perhaps more challenging, and one party may need to pull over slightly and allow the other vehicle to pass. In our experience it is a case of the party best placed to yield does so at a convenient and safe position on the road and so facilitate the easier passage of the other party.

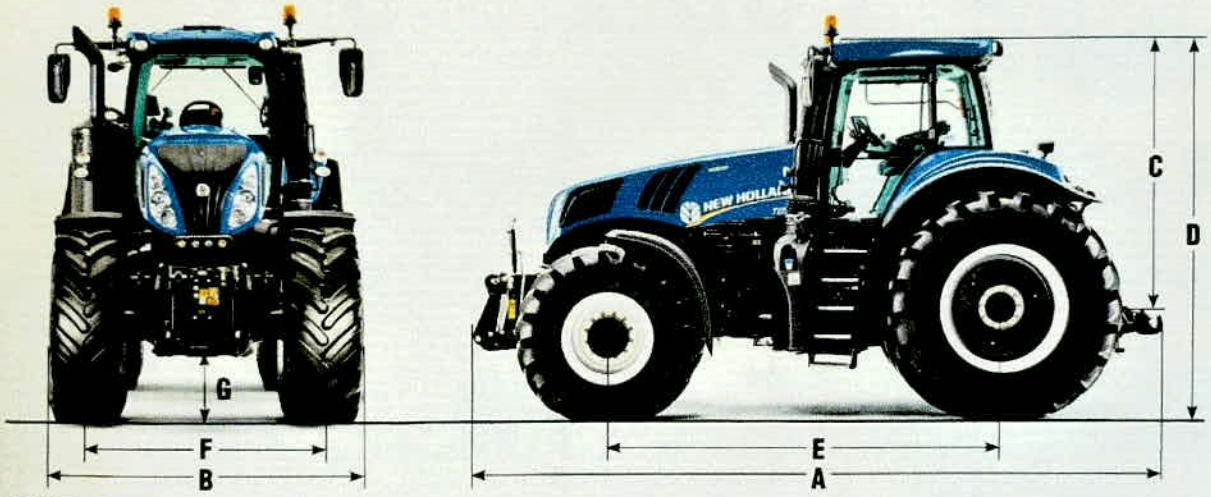
Obviously navigating a Country Roadway is much more difficult where there is sharp bends and corners and other abrupt change in the verge boundary conditions whereas in this instance due to its excellent sightlines and occasional set back entrances along its length there is ample opportunity for opposing vehicles, including very large vehicles to pass safely and without undue delay.

To give a more tangible example of the type of farm vehicle, in this case a tractor unit, that may in encountered on any Rural Road in Ireland, at any time, we enclose in Fig 5 below an extract from a popular farm tractor sales brochure, namely the New Holland T8 Tractor Unit, which shows dimensions and scale for this machine.

While we understand that the T8 Tractor Unit is one of the biggest farm tractor units currently available in Ireland, according to a New Holland Sales Agent we spoke with, the slightly smaller but wider New Holland T7 Series machine, at 2.75m wide, is in fact a much more common and popular machine among farmers across the Irish countryside.

Weights						
Minimum unballasted / shipping weights: Standard front axle	(kg)	10,715	10,840	10,840	10,915	12,514
Terraglide™ suspended front axle	(kg)	11,235	11,360	11,360	11,440	13,039
Max. permissible weight at 50kph***	(kg)	17,500	17,500	17,500	18,000	18,000

● Standard O Optional – Not available * Developed by FPT Industrial
** Biodiesel blend must fully comply with the latest fuel specification EN14214:2009 and operation is in accordance with operator manual guidelines *** European Highway restrictions



DIMENSIONS

With rear tyre size*****		620/70R42	650/85R38	710/70R38	710/70R42	800/70R38	900/60R42****
A Overall length inc. weight pack and rear linkage	(mm)	6247	6247	6247	6247	6247	6477
B Min. width	(mm)	2534	2534	2534	2534	2534	2534
C Height at centre of rear axle to top of cab	(mm)	2475	2475	2475	2475	2475	2475
D Overall height	(mm)	3400	3450	3400	3450	3450	3435
E Wheelbase Ultra Command / Auto Command	(mm)	3450 / 3500	3450 / 3500	3450 / 3500	3450 / 3500	3450 / 3500	3550
F Track width (min. / max.)	(mm)	1727 / 2235	1727 / 2235	1727 / 2235	1727 / 2235	1727 / 2235	1727 / 2237
G Ground clearance (depends on hitch or tow hook)	(mm)	378	306	364	415	407	409

**** Ultra Command model only when fitted with Heavy-duty rear axle
***** Rear tyres other than those mentioned are available: 620/70R42, 650/85R38, 710/70R38, 710/70R42, 800/70R38, 480/95R50, 710/75R42, 900/60R38, 900/60R42, 900/70R38

Fig.5: New Holland T8 Tractor Geometry Specifications (Farm Machine of the Year 2014)

As for any other vehicle licenced to use the road network there are of course limits on the size of agricultural are given in the Road Safety Authority's (RSA) leaflet on the *'Weights and Dimensions of Agricultural Vehicles'* with a relevant extract showing vehicle widths in Fig.6 below:

TYPE OF AGRICULTURAL MACHINERY	Maximum Width	Maximum Length	Maximum Height
AGRICULTURAL TRACTOR	2.55m	12m	4.65m*
AGRICULTURAL TRAILER	2.55m*	12m	
LARGE TRACTOR (I.E. UNLADEN WEIGHT EXCEEDING 7.25 TONNES)	2.75m	12m	
TRACTORS WITH FLOTATION TYRES OR DUAL WHEEL SYSTEMS	3.50m	12m	
FULLY MOUNTED EQUIPMENT AND INTERCHANGEABLE TOWED EQUIPMENT	3.00m	12m	
SELF-PROPELLED AGRICULTURAL MACHINERY	3.50m*	12m	
AGRICULTURAL TRACTOR & TRAILER COMBINATION	2.55m	18.75	

**The 4.65m limit applies to all agricultural vehicles/combinations of vehicles except those transporting agricultural baled produce (i.e. hay, silage straw or other animal fodder) which has no height limit.*

Fig.6: RSA Agricultural Vehicle Dimensions

While Kingswood Farm is still operational, we expect farm traffic movements from this source to greatly reduce. Nevertheless, we still expect there to be some farm traffic along this Country Lane with larger sized vehicles and situations when the opposing vehicle sizes are incompatible with the width of parts of the roadway. In that instance then either one party should not enter the Laneway until it was clear or else one party would yield at a

convenient point and allow safe passage of the other party. Indeed, we contend that this what has always happened on this Country Lane.

With this in mind, and re-considering the traffic analyses and drawings submitted with the planning application, namely Drawing Nos. CRFC-SC-AA-00-DR-C-2013-P12 to CRFC-SC-AA-00-DR-C-2015-P12, from a traffic point of view the real benefit of the presence of a Rugby Football Club in this location rather than any other activity is that during weekdays Club traffic coming and going will be generally confined to the evenings, after work hours, for training typically. Traffic movement by Club Members is inherently one-way in that members will arrive in advance of training or some such scheduled activity and then leave after it has ended.

Any commercial activities in the vicinity will be working business hours and most farming activities are generally daytime or else involve limited traffic movements in the evenings such that we expect there to be practically no overlap. So effectively will be one-way vehicular traffic to and from the Club.

During the weekends, on the other hand, matches are played during the day, for the most part, which may mean a clash with local business activities however, even in this case, traffic to and from the club grounds would also effectively be one way, with everyone arriving in advance of matches starting and then leaving in small grounds and in a staggered pattern typically after the game has finished.

Therefore, all things considered, we reiterate our comments from our Planning Application cover letter and say that in our considered opinion that the presence of the club will not make the situation any worse or inherently unsafe than that which pertains at present.

Notwithstanding all of this, we would welcome the imposition of a 30 kph speed limit restriction zone being placed on this Country Laneway

To summarise and repeat some of the arguments lodged with the planning application as follows:

- From the various traffic analyses and AutoTrak® simulations that we have run to date in our opinion the arrangement postulated is workable, especially considering the transit times involved.
- We acknowledge that there are a few areas that are 'tight' however from a Rural Country Road perspective this laneway is very much at the 'reasonably good end' of the scale with respect to roadway adequacy.
- Club traffic during weekdays will be generally one-way and mostly confined to evenings from 7pm – to approximately 10pm which the is general training times, whereas at weekends for home matches held on Saturday and Sundays afternoon.
- There are excellent sightlines from the proposed new Vehicle Site Entrance each way.
- With the break up and the partial retirement of the main Kingswood Farm holding, we expect that there would be less farm vehicles using the Country Laneway overall and therefore the situation will be improved from that which currently exists.

ITEM 1: Subsection (3) of (5):

> (4) Swept path analysis (AutoTRAK) drawing demonstrating bus coach & emergency vehicle/bin truck movements through the site, including bus coach parking movements.

RESPONSE:

Swept path AutoTRAK® analyses were undertaken during the design development of the proposals at the Pre-Planning stage and while they were in fact included on Drawing No. A.03.02.5.4 entitled 'Vehicle Tracking' at scale 1/1000 we accept that the 4 No. analyses presented for Refuse Truck, Car, Coach and Fire Tender swept paths could be better communicated at a larger scale and in a less cluttered manner.

Therefore, we have re-run these swept path simulations again and the results can be found in the A3 bound design set and specifically on Drawing Nos. A.03.05.1.1 to Drawing No. A.03.05.1.4 for Fire Tender, Coach, Car and Refuse Truck swept paths respectively. The scale of these drawings is 1:500.

ITEM 1: Subsection (4) of (5):

> *(5) a revised drawing showing:*
> *(c) minimum 5 mobility impaired spaces*
> *(d) minimum 10 EV charging point locations*
> *(e) details of how all carpark spaces will be ducted/future-proofed for the introduction of EV charging equipment in the future.*

5 No. mobility impaired spaces as well as 10 No. EV charging point locations have now been provided and are indicated on Drawing No. A.03.05.1.1 showing the entire site layout plan, the proposed landscaping and surface treatments all at scale 1:500 (i.e. A0 format drawing). Underground ducting will be provided so that all car parking spacies can be converted in future to EV charging points.

ITEM 1: Subsection (5) of (5):

> *(6) a Taking-in-Charge drawing showing any areas that are to be offered to the local authority for Taking in Charge.*

RESPONSE:

The country road forming the main vehicle entrance vehicular access to the site is already under the charge of SDCC but otherwise and at this time there are no plans to request that any part of the proposed development is to be taken in charge.

Notwithstanding this we confirm that it is intended that all works will be constructed in strict accordance with current *Taking-in-Charge* standards and of course the Building Regulations.

ITEM 2 – HERITAGE & ENVIRONMENT

ITEM 2: Subsection (1) of (1):

> 2. *(i) The applicant is requested to submit an updated ecological survey report, with surveying being undertaken in the appropriate season, which coincidently 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 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.*

RESPONSE:

This item is effectively dealt with in its entirety by the updated Ecological Assessment Report Ref. PES_EcIA_21630 by Planter Environmental Solutions dated 8th August 2022 as this takes into account, in addition to their own additional surveys and findings, inputs from the surveys and report by the Bat Ecologist, (Daniel Connell of VEON Ltd), the Arborist (Ethan Gannon of VEON Ltd), as well as the various lighting analyses and calculations by Wink Lighting Ltd and *Synergy Energy UK*.

The Bat Assessment Report and survey recorded 7 out of the 9 Resident Bats species known to occur in Ireland foraging and commuting within the grounds of Kingswood Farm. This represents a high bat biodiversity level.

Bat Species	Roosting	Foraging	Commuting
Leisler's (*Nyctalus leisleri*)	X	✓	✓
Soprano Pipistrelle (*Pipistrellus pygmaeus*)	X	✓	✓
Common Pipistrelle (*Pipistrellus pipistrellus*)	X	✓	✓
Whiskered (*Myotis mystacinus*)	X	✓	✓
Daubenton's (*Myotis daubentonii*)	X	✓	✓
Nathusius' Pipistrelle (*Pipistrellus nathusii*)	X	✓	✓
Natterer's bat (*Myotis nattereri*)	X	✓	✓

Fig.7 Bat Survey Results by VEON

The report concludes that the primary areas of bat foraging and commuting activity was concentrated along the Camac River and the Baldonnell Upper stream/drainage ditch which is itself a tributary to the Camac and joins it adjacent to the stone road bridge carrying the Country Lane. Importantly no roosts were recorded in trees, buildings, or other structures either within or in-close-proximity-to the footprint of the proposed building project locations nor in the hedgerows that are proposed to be removed.

The Bat Assessment Report also considered inputs from the Arborist, the Architect's proposed landscaping arrangements and building design as well as the lighting distributions, reports and drawings by Wink Lighting and the floodlighting calculations by Synery Energy UK.

Bats have now been considered in all aspects of the design process and an array of bat compensatory and mitigation measures are recommended including the following:

- Ensuring that all proposed renovation works have consideration for potentially foraging and commuting bats, the site ecologist, clerk of works, conservation architects, design architects and contractors will be required to draw up a "Work Plan" to ensure that the steps undertaken take into consideration the bat mitigation and compensatory measures detailed in the Bat Assessment Report are considered prior to construction.
- While there was limited bat activity recorded within the proposed open pitch and training areas, any artificial lighting used here would be acceptable in principle but subject to the mitigation measures highlighted below.

The Ecologist's Impact Assessment concludes as follows:

> "Considering the nature of the development and the adjacent urban and industrial areas further to the northwest, the main potential cumulative impact upon biodiversity would be a deterioration in water and air quality during the operational phase resulting in an impact upon aquatic flora and fauna species and / or loss or fragmentation of natural habitat.
>
> It is not anticipated that there would be any significant impact upon water quality during the operational phase, given that stormwater from the site would be directed to the drainage network and attenuation system and percolate to ground within the site. The surface water drainage will be attenuated in line with the recommended guidelines and policy. The sanitary service drainage system will be discharged to municipal sewer via a proposed new connection.
>
> With regards potential habitat loss or fragmentation of habitat, the proposed development is not anticipated to result in a significant impact upon habitat loss / fragmentation during either the construction or operational phases, given that the majority of the land would comprise of modified habitats of low ecological value and given that the landscape plan for the development will take into consideration the

setting and use of native species. Any hedgerows removed will be offset by planting new hedgerows with native species typically found in hedgerows in the local area. No construction works will take place within the Camac River or Baldonnell Upper watercourse. Therefore, there would be no cumulative habitat loss or fragmentation impacts which could pose a significant risk to biodiversity.

Potential cumulative lighting impacts from external lighting for both developments have been addressed in the mitigation measures proposed in Section 7.2.2, accompanying lighting assessment and bat assessment report for this development, therefore cumulative impacts as a result of external lighting should not arise."

See accompanying lighting assessment and design by Wink (Report Ref: 22112 - Clondalkin RFC). The lighting design would take cognisance of the following mitigation measures as set out in Section 7.2.2 of the Ecological Impact Assessment Report Ref PES_EclA-21630 which are reproduced here for convenience:

- Lighting would be directed to where it is required only;
- Lighting of hedgerows / treelines would be avoided where possible;
- Buildings, carparks and site entrance lighting would be angled away from hedgerows and treelines;
- Direct lighting of the Camac River to be avoided;
- Lighting would be of low height where possible, to minimise light spill;
- Where possible and practicable to do so, timers or motion sensors would be used;
- White LED or amber coloured LED outdoor lighting would be used where possible, which is considered to be low impact in comparison to other lighting types.

No artificial lighting is envisaged during the construction stage as any construction works will be undertaken during daylight hours only.

These recommendations have all been reflected on the Architect's new site layout plan for the development. Refer Drawing No. Drawing No. A.03.05.1.1 showing the entire site layout plan, the proposed landscaping and surface treatments all at scale 1:500 (A0 format drawing) as well as throughout the entire A3 bound design drawings which have been updated in accordance with these reports.

ITEM 3 – PARKS DEPARTMENT/ PARKS & LANDSCAPING/ PUBLIC REALM

ITEM 3: Subsection (1) of (4):

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.

RESPONSE:

An Arboricultural Assessment Report dated 20th June 2022, by Arborist Ethan Gannon of VEON (Forestry, Ecology & Environmental) Ltd, and associated drawings inherently responds to the majority of this item subsection.

Specifically:

(i) Refer to Tree Survey Plan: all trees and hedges on and adjacent to the subject site (i.e., within falling distance thereof) accurately plotted, tagged, and shown on a scaled drawing of a topographical survey of the site and VEON Drawing 'Clondalkin Tree Survey Plan' attached.

(ii) Tree Survey Schedule: a summary of the surveyed trees and hedges, recording tag nos., digital photograph, species, size, age, condition, management recommendations, useful life expectancy

and category grade in line with BS 5837:2012. Refer to VEON Drawing 'Clondalkin Tree Survey Schedule attached.

(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 and losses etc. (total number surveyed and total numbers and percentage to be retained and removed respectively).

(iv) Drawings No. A03.05.3.2 included within the bound A3 drawing set shows the principal design iterations gone through during the per planning phase for this project and which we trust are self-explanatory.

(v) Tree Constraints Plan by VEON (Forestry, Ecology & Environmental) Ltd attached shows the impacts of all surveyed trees in relation to the site layout of the proposed development. It has been plotted at a scale of 1:500 as requested on an A0 size drawing as this site will not fit in its entirety at the requested scale on an A1 drawing. This is the reason the original survey and site layout drawings were submitted on 2 No. A1 size drawings with the Planning Permission.

(vi) Colour coded Tree Protection Plan by VEON (Forestry, Ecology & Environmental) Ltd attached shows a scaled (1:500) site plan (at A0 size) 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 will 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.

Item subsections 1(a)/(viii) to (xi) is dealt with directly in the Arborist's Report and all of the above have been incorporated on the Architect's new overall site layout plan for the development, (Refer Drawing No. Drawing No. A.03.05.1.1 showing the entire site layout plan, the proposed landscaping and surface treatments all at scale 1:500 (A0 format drawing) as well as the entire A3 bound design drawing set.

ITEM 3: Subsection (2) of (4):

(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.

RESPONSE:

These have all been specifically reflected on the Architect's new site layout plan for the development, (Refer Drawing No. No. A.03.05.1.1 showing the entire site layout plan, the proposed landscaping and surface treatments all at scale 1:500 (A0 format drawing) as well as the entire A3 bound design drawings which have been updated in accordance with the various specialist reports included with this submission.

ITEM 3: Subsection (3) of (4):

(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.

RESPONSE:

Refer to Bat Assessment Report, Arborist Report and Drawings as well as the updated Ecological Assessment by Planter Environmental Solutions Ltd for comprehensive treatment of these issues. Please read in conjunction to Item No. 2 Response where bat mitigation and compensatory measures are highlighted.

ITEM 3: Subsection (4) of (4):

(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.

RESPONSE:

Refer to Hydrocare Environmental Ltd statement in Appendix E which reiterates and elaborates on the sustainable urban design strategy for the site. The proposed SuDS features for the development consists of swales, soakaways, gravel surfacing, grasscrete and filter drains which are all natural SuDS features which promote infiltration and the indirect replication of the natural water cycling process.

The bound A3 set includes details multiple drawings, particularly Drawing Nos. A.03.05.3.1 to A.03.05.3.11 describing multiple details requested and which we trust are self-explanatory. These drawings have been compiled based on the findings of the various specialist reports, particularly the Ecological Impact Assessment Report along with the their specialist advices for appropriate planting regimes.

ITEM 4 – ZONING, COUNCIL POLICY & DRAWINGS SUBMITTED

ITEM 4: Subsection (1) of (2):

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.

RESPONSE:

The proposed 'Member's Bar' is not a 'Public House' *per se* as it is not available to members of the General Public. Rather, it's use is for paid up members only and their guests and is an essential element in building the social fabric for the club membership.

The proposed use of the Members Bar is ancillary to the primary use of the Clubhouse as a high-quality sports and recreational facility. Basically, the proposal is to 'move' the Member's Bar amenity from the old Clubhouse in Gordon Park to the location assigned on the first floor of the proposed Clubhouse Pavilion at the subject site. The current Clubhouse Member's Bar is covered by a Club Licence which has been in place for many decades now. It gets regularly renewed by the Courts, subject to reports from An Garda Síochána and confirmation that a valid Fire Safety Certificate is in place. To date this renewal has never been denied for any reason, for example such as improper use or the like.

The area of the existing Member's Bar in Gordon Park is approximately 126 sqm whereas the area of the proposed Member's Bar at Kingswood Farm is calculated as 136 sqm (Refer Fig.8). Therefore, it is designed to be of a similar size (albeit 8% larger) and as such it still represents less than 22% of the Proposed new Clubhouse Pavilion floor area being developed and less than 15% of the developed area when considered as a

portion of the Changing Rooms Building and Clubhouse Pavilion together. So, it is of a relatively small scale which is as it such be being ancillary to the proposed overall Sports and Recreational Facility use.

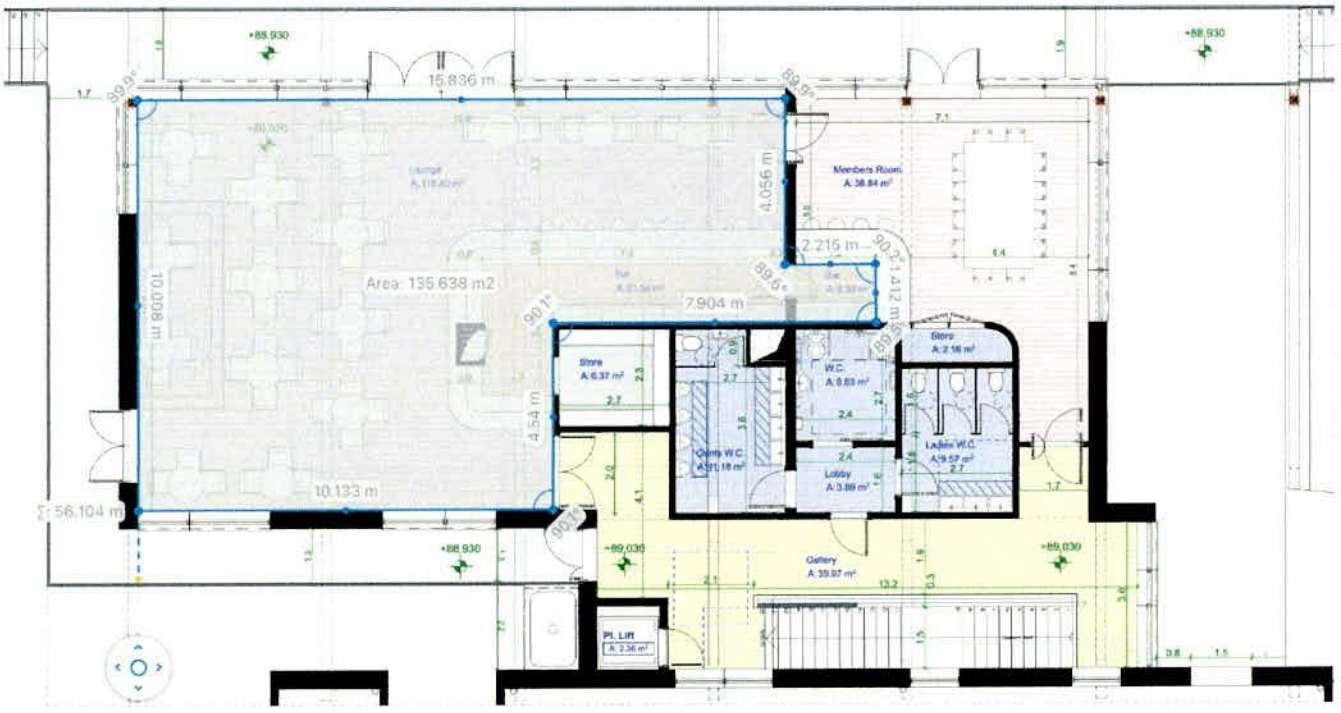


Fig.8: 'Members Bar' First Floor Area Calculation

A Rugby Club is not just about the physical activity of playing rugby and being physically active, it is much more than that. It is a team sport, involving mens, womens and juvenile teams covering all age groups and as such building bonds between players and the wider club membership is very important. This is especially true as there are many Members, such as older retirees, ex-playing members, retired referees, Member's spouses and parents of the juveniles, etc who make valuable contributions to the Club and frankly these is no better way for the wider membership to get to know each other than in the convivial atmosphere of the clubhouse after a hard victory or loss. Indeed, its arguably that the real success of Clondalkin RFC over the last almost half-century has been the social bonding of a wide range of Members who have met and become friends over the years. People from the local environs of Clondalkin, Tallaght, Newcastle, Rathcoole and Saggart and further afield, as well as from all backgrounds and age groups.

Irish Rugby also comes with a lot of tradition with having one of the oldest Rugby Clubs in the world with the founding of Dublin University RFC in 1854. Clondalkin RFC is much more recent by comparison but even, so it has built its own history in the past 50 years through the selfless efforts of many Members past and present over the years. The Member's Bar is a place to talk about the past present and future of the Club.

Lastly, it is important to mention, that Clondalkin Rugby Football Club is a Junior Rugby Club and as such it is a not-for-profit entity. All positions including ground maintenance are voluntary. Member fees are fully absorbed by Player Insurance requirements and therefore the Member's Bar represents a valuable and indeed the only source of income by which to fund the ongoing upkeep and maintenance of the clubhouse and grounds.

.

Consequently, we would therefore argue that a Member's Bar is essential to the ongoing successful operation and maintenance of the club. It is not open to the public and and will effectively serve as the Club's Function Room, where wider member meetings and annual Club celebrations can be held.

ITEM 4: Subsection (2) of (2):

4	*(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.*

RESPONSE:

Drawing No. No. A.03.05.1.1 showing the entire site layout plan, the proposed landscaping and surface treatments all at scale 1:500 (A0 format drawing)

ITEM 5 – PUBLIC LIGHTING & IRISH AVIATION AUTHORITY

ITEM 5: Subsection (1) of (2):

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.*

RESPONSE:

More detailed Flood Lighting calculations have been carried out by *Synergy Energy UK* Philips Lighting Floodlighting Specialists, which along with the site analyses undertaken by Wink Lighting have lux level iso-countours for the siteas shown in Wink Lighting's Report and on the drawings. These contours have been superimposed by the Architect on the site terran as shown on Drawings No. A.03.05.2.1. A number of sections have been cut at critical points on this plan to analyse the effect of the spill lighting and lux levels on the R136 Distributor Rd and the N7 sliplane. Refer to Drawing No. A.03.05.2.2 for these sections should should be self-explanatory and to Drawing No. A.03.05.2.3 for the Adjusted Light Spill Levels, which show that they this is not a significant problem.

No public lighting envisaged at entrance or on the Country Roadway at this time and therefore we see no requirement for additional Public Lighting services needed along the Country Laneway. The site will be sufficiently internally, and during evening use by the 6m lighting poles and bollards arranged around the CarPark and along the cycle trank and bike paths throughout the site all in accordance with the Architect's overall Site Layout and Landscaping Plan, (Drawing No. A.03.05.1.1) and as per Wink Lighting Report Ref. 22112.

ITEM 5: Subsection (1) of (2):

5	*(b) The applicant is requested to liaise with the Department of Defence regarding their requirements for the proposal.*

RESPONSE:

We have already liaised with the Department of Defence and received the requirements of the Department of Defence Property Management Section and constraints for developments within the Inner Security Zone. These are summarised in Appendix D and in Fig. 9 below. No tower cranes are envisaged at any stage on site during the construction phase. The proposed Clubhouse Pavilion is only two storeys high and has a roof level less then 10m above ground level. The Red Zone portion indicated below is over a portion of the surface car park and proposed Wildflower Meadow area and therefore of negligible significant from a risk perspective.

Figure 7.7: Runway 29 Red Zone and 10^{-5} Risk Contours

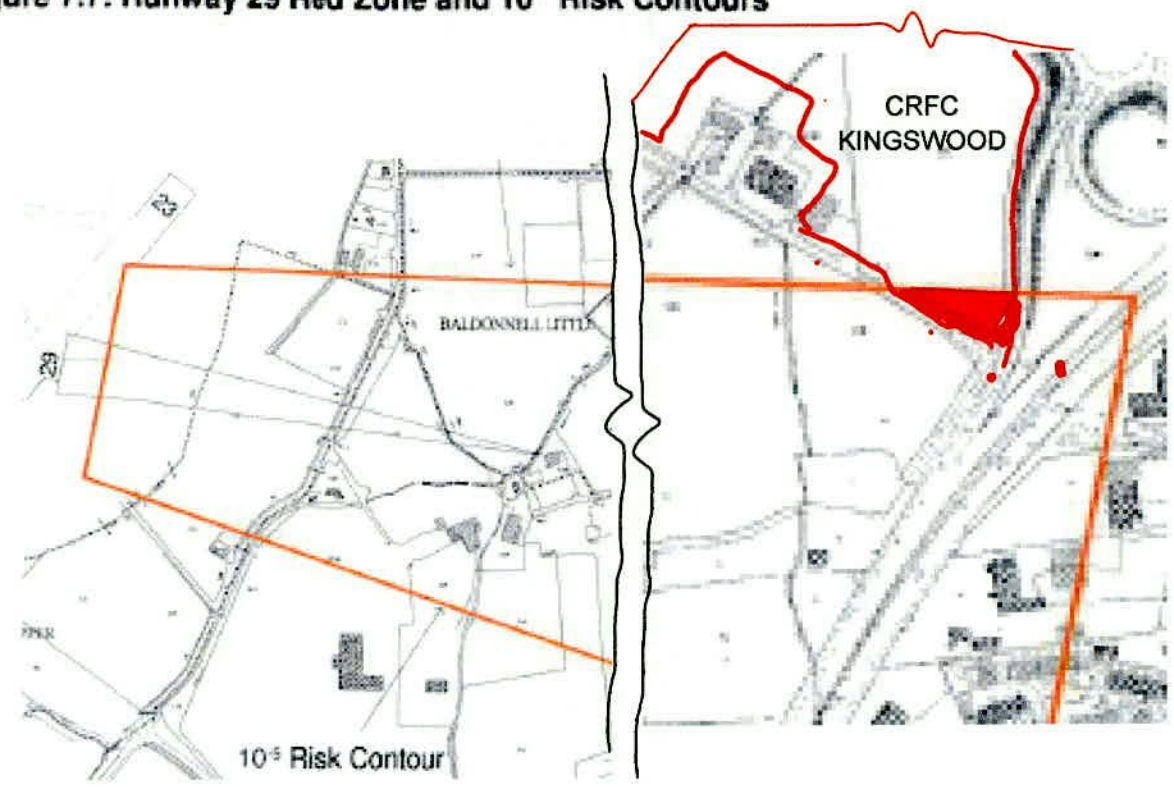


Fig.9: Runway 28 Risk Corridor

Fig. 9: Blow up of Risk Corridor on Site Boundary, Car Park & Southern Wild Flower Meadow Area

The aim of this Planning Application, and the order of priorities for the Club's Management Committee is, at the most fundamental level, to facilitate access to more playing pitches in the locality for the Club, and then improve the number of dressing rooms to suit and lastly to build a modern energy efficient Clubhouse Pavilion in a sustainable environment and so secure the longer term future of the Club.

Clondalkin Rugby Football Club will be 50 years old next year and they have spent the bulk of that time in Kingswood. They moved here when it was a very rural community, but progress and the locality of Gordon Park has, in the time since, become a much more urban and very busy residential and commercial neighbourhood. The old grounds at Gordon Park will be a welcome and hopefully happy new home for new residents of the Old Naas Road, at Kingswood and we hope that the new home for the Club at this new site, still in Kingswood will be a place where the Club can continue to develop in Rugby at all levels and grades as well as its supporting community of Members and friends.

We trust that the above is all in order and that you will consider our application favorably.

Yours faithfully,

Paul Sexton
CHARTERED ENGINEER
FOR SEXTON CONSULTING

APPENDIX A

Connecting You to

Comhairle Contae Átha Cliath Theas
South Dublin County Council

Economic, Enterprise & Tourism Development Department

Mr Paul Sexton
Chartered Engineer
SCEG Limited
"The Five Roads"
Jordanstown
Lusk
Co Dublin

Date: 28 Mar 2022

WITHOUT PREJUDICE
SUBJECT TO CONTRACT/CONTRACT DENIED

Dear Paul

Re: Proposed pedestrian and cycle access to facilitate relocation of Clondalkin Rugby Football Club to lands adjacent to the R136 and Kingswood Overbridge – Grant of Consent to include lands in a planning application

I refer to your request, on behalf of Clondalkin Rugby Football Club, to include lands in Council ownership in a proposed planning application.

I now wish to confirm that South Dublin County Council hereby grants its consent to include lands circled in red on attached Drawing No. A.03.02.12 in a planning application for the purposes outlined above.

The Council Public Realm report requires that agreement must be reached with the Council on the removal of trees required to facilitate the access points, protection of retained trees during construction works, and compensatory planting or other mitigation measures required.

The Council Public Lighting Section report requires that caution should be exercised to ensure that any planned works do not impact existing public lighting services in the area.

Please note that this consent does not convey to SCEG Limited or their client, Clondalkin Rugby Football Club, any interest whatsoever in the subject lands and is for the sole purpose of allowing a planning application to be made.

This consent is valid for a period of twelve months from date of this letter.

The consent is conditional on no development taking place until full planning permission has been granted and the Council is in a position to enter into an appropriate agreement with Clondalkin Rugby Football Club in respect of the lands.

Yours sincerely

Amanda Martin
Senior Staff Officer
Development Section

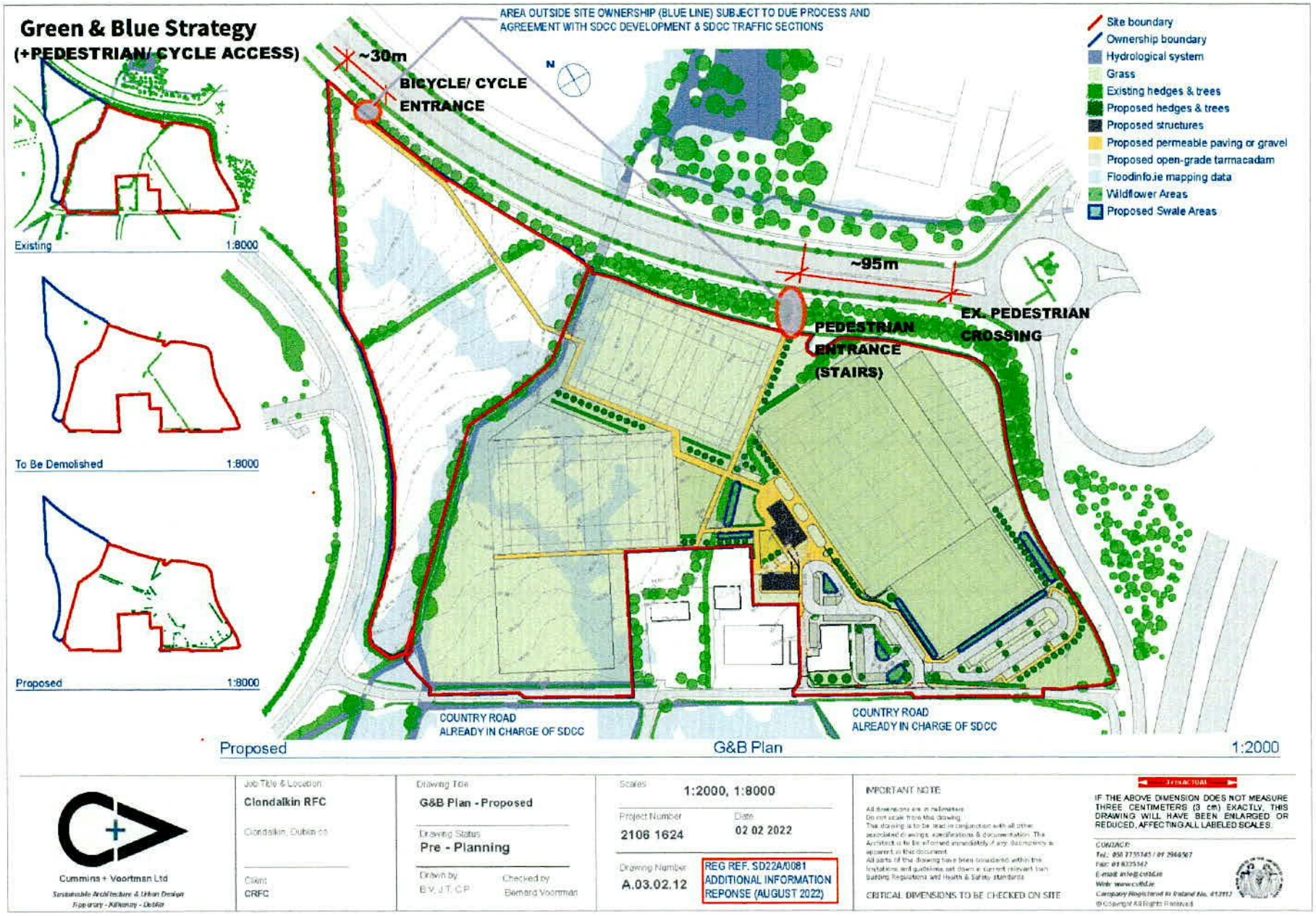
Encl

Comhairle Contae Átha Cliath Theas
Halla an Contae, Lár an Bhaile,
Tamhlacht, Átha Cliath 24

South Dublin County Council,
County Hall, Town Centre,
Tallaght, Dublin 24.

Tel: +353 1 414 9000
SMS: 086 173 1707
Email: info@sdublincoco.ie

Ceangail 24/7 Connect 24/7
with Council information and
services at www.southdublin.ie



APPENDIX B

As part of this AI 2 No. additional areas of the site were surveyed by DMC Surveys to include more detail on an approximately 35m long portion of the boundary with the R136 to allow consideration in more detail of the issues around installing a Pedestrian Access stair and a cycle access corridor across SDCC lands per letter of consent. These surveys picked up the existing light poles (LP) present which allowed proper sighting of the proposed two new Pedestrian and Cycle Access entrances respectively as follows:

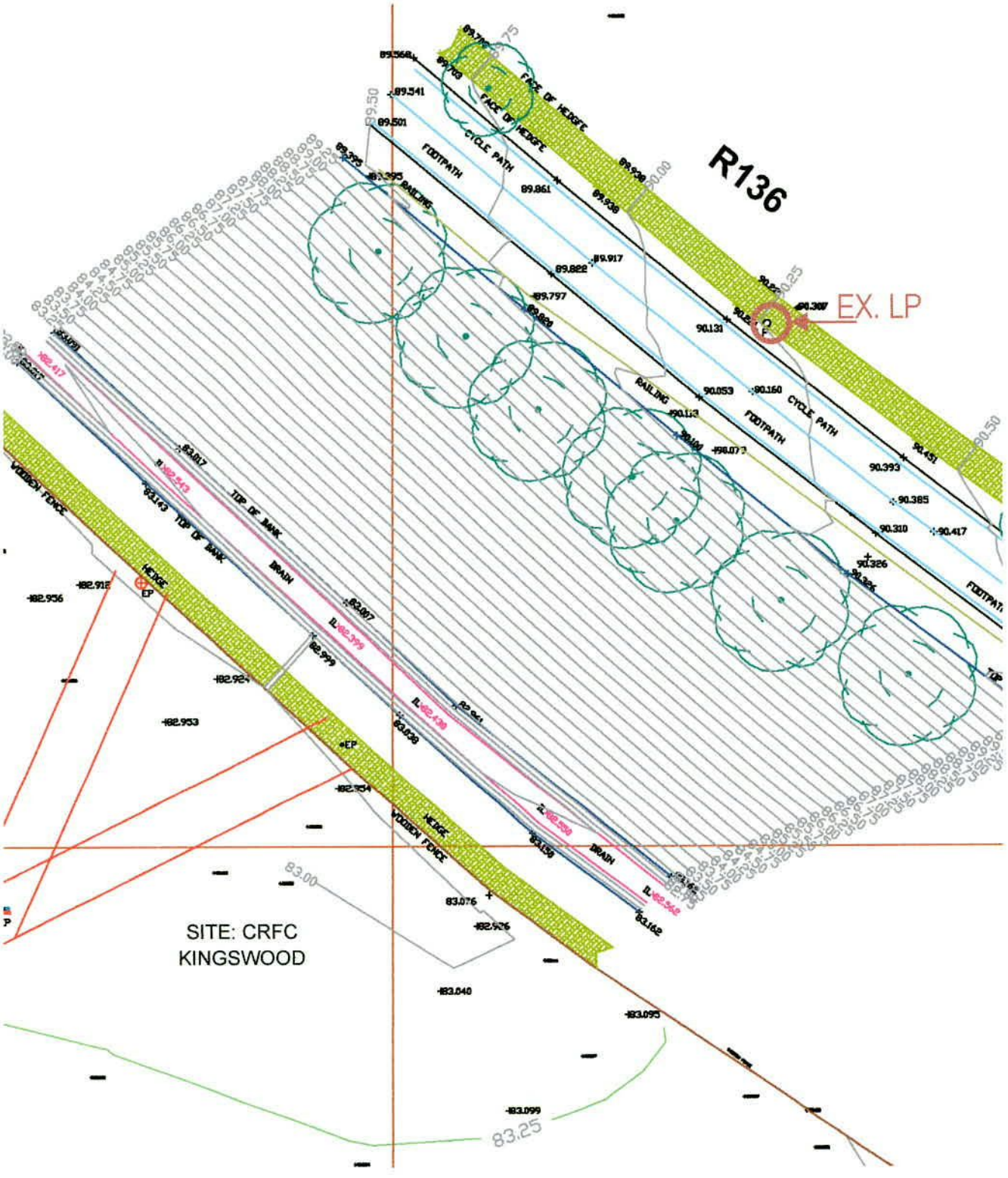


Fig.A1: PROPOSED PEDESTRAIN STAIRS ACCESS OFF R136: **(SCALE 1/200 @A4)**

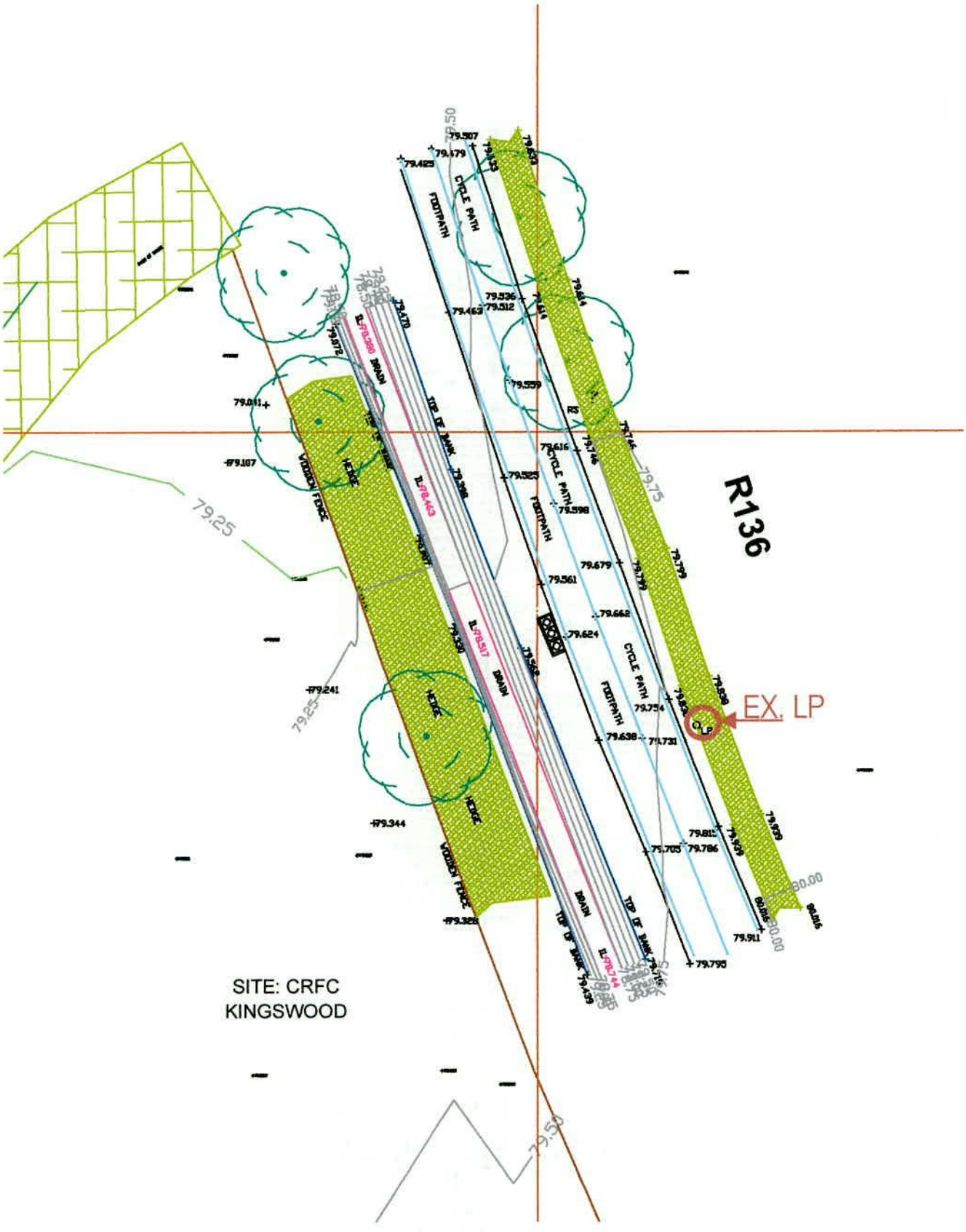
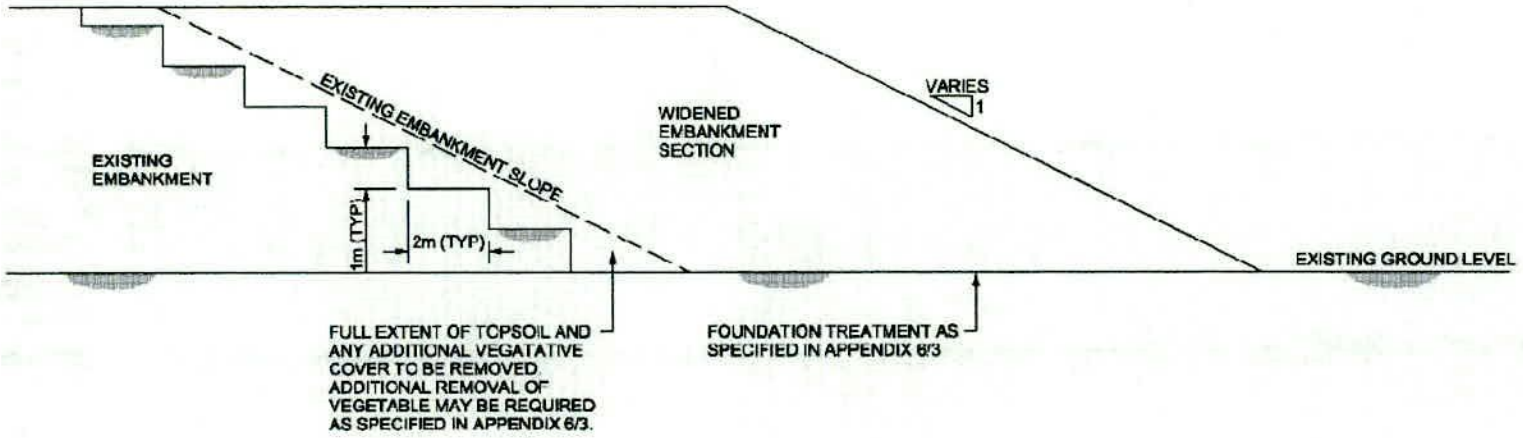


Fig.A2: PROPOSED CYCLE TRACK STAIRS ACCESS OFF R136: **(SCALE 1/200 @A4)**

Note: A copy of the latest topographical survey for this site, incorporating these two access points is available to the relevant sections of South Dublin County Council on request.

NOTE
1. BENCH DIMENSIONS SHALL BE AS SPECIFIED IN APPENDIX 6/3 AND SHALL NOT RESULT IN A SLOPE ANGLE STEEPER THAN 1(V) 2(H) MEASURED FROM THE TOE TO THE CREST OF THE SLOPE.



Transport Infrastructure Ireland

ACTIVITY: CC Construction & Commissioning

STREAM: STANDARD CONSTRUCTION DETAILS (SCD)

PUBLICATION TITLE:
EARTHWORKS
FILL AGAINST EXISTING EMBANKMENT

HISTORICAL REFERENCE	DOCUMENTATION SET	PUBLICATION DATE	PUBLICATION NUMBER		
			ACTIVITY	STREAM	DRAWING NUMBER
RCD/600/8	STANDARDS	MARCH 2013	CC	SCD	00608

APPENDIX D

We liaised with the Property Management Section of the Department of Defence in advance of the submission of this Planning Application and they advised us that there were a number of constraints to development of this site as follows:

The site in question was called 'Lot 1' at the time of our enquiry and the response of the Department of Defence dated 6th April 2021. This is quoted here for the convenience of all concerned:

Lot 1: C:25 acres.
Apart from a small south east portion, this site lies outside the PSZ and Red Zone but within the 2km zone. The southern half however lies underneath the Approach Surface to Runway 28 and the Take Off Climb Surface of Runway 10.

- A height restriction of 20m would apply.
- In the south east corner within the red zone (see attached map), no development that will cause people to congregate within the area.

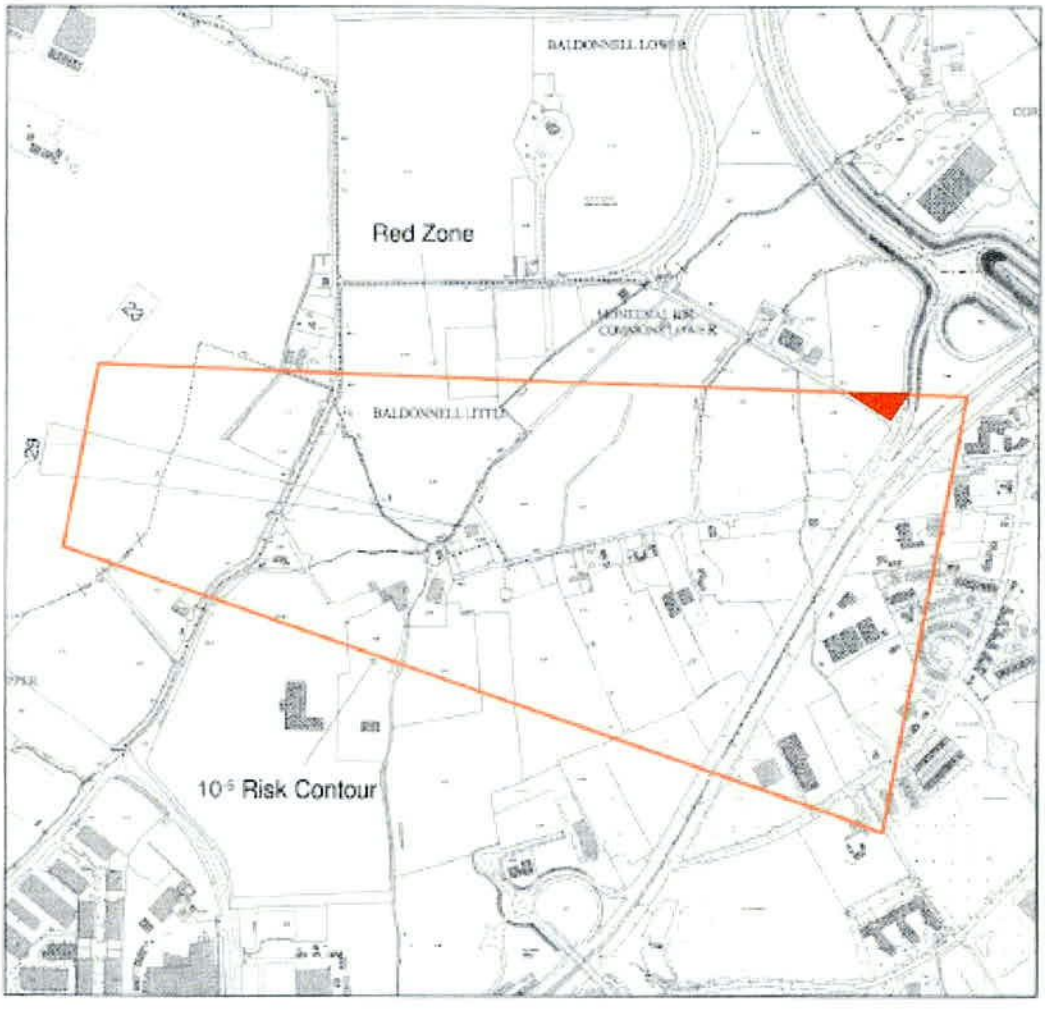
On the other hand, outside of the PSZ and Red Zone, where the majority of the site lies, the restrictions are more relaxed which we quote as follows:

This site lies wholly outside the PSZ's, Red Zones and Approach/Take Off Climb surfaces.

- A height restriction only of 30m will apply.

All planning assessments also consider lighting, bird attractants, construction methods etc.

Figure 7.7: Runway 29 Red Zone and 10^{-5} Risk Contours



The slight overlap in the corner of the site into the 'Red Zone Risk Contour is highlighed in Red on 'Figure 7.7' which was provided to us as part of the Department of Defence's reponse.

APPENDIX E

HYDROCARE
ENVIRONMENTAL LTD

Environmental Consultants
Cooperhill Rd., Beamore,
Drogheda, Co. Meath

Tel: 0419842378 Mob: 0877905155 / 0872208633 Email: info@hydrocare.ie

Job Ref: 22-347

22/08/2022

Planning & Environmental Dept,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24.

Re: Surface Water Drainage for the Additional Information Request, Planning Ref. No. SD22A/0081
Applicant: Clondalkin Rugby Football Club Ltd.
Site Address: Kingswood Farm, Moneenalion Commons Lower, Clondalkin, Dublin 22.

To Whom it Concerns,

Hydrocare Environmental Ltd have been retained by the applicant to issue a response to items 3(b)-(i)-(b)-(ii) and 3(d) of the additional information request for this planning application, ref. no. SD22A/0081.

Item 3(b)-(i)-(b)-(ii) of the AI request states: *Landscape Masterplan should be to scale of not less than 1:500 showing – Details of natural SuDS features including swales, permeable paving, green roofs and bioretention tree pits etc.*

Response to 3(b)-(i)-(b)-(ii): The surface water management system for the proposed development site consists of swales, soakaways, gravel surfacing, grasscrete, and filter drains. The soakaways have been designed in accordance with BRE 365 Digest Requirements in order to achieve the required storage volume and the half empty time of less than 24-hours. This is an integrated approach to surface water management. The site has been broken down into smaller catchments from which the surface water runoff from the impermeable surfaces will flow into a number of soakaways. Swales, soakaways have been selected as they locally address water quality and water quantity as they provide a level of pre-treatment and filtration for the surface water runoff before it infiltrates to the ground locally.

Item 3(d) of the AI request states: *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*

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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.

Response to Item 3(d): Infiltration Rate Tests were carried out for this development per BRE Digest 365 requirements. The infiltration rate tests have yielded very good drainage across the entire site area. It is proposed to install soakaways to cater for the surface water runoff from the impermeable surfaces at this proposed development. The soakaways have been designed to achieve the storage volume and half empty time less than 24-hours per BRE Digest 365 requirements. The site has been broken down into three smaller catchments from which the surface water runoff from the impermeable surfaces will flow into a number of soakaways. Soakaways have been selected as they locally address water quality and water quantity as they provide a level of pre-treatment and filtration for the surface water runoff before it infiltrates to the ground locally. The soakaways have been designed to function per BRE Digest 365 requirements without the need for further natural SuDS features. The soakaways will all be located in green areas within the development, no soakaway will be located beneath the impermeable surfacing.

In addition to the soakaways, it is proposed to install a number of different SuDS features at this development site. This includes the provision of swales adjacent to the proposed training pitch, parking areas driveways and footpaths. The swales will be vegetated with biodiverse inland plant species. The driveways and carparking areas will be constructed from gravel and grasscrete. The soakaway system has been sized assuming 100% runoff from the gravel and grasscrete footpaths, driveways and car parking areas. However, there will be infiltration to the ground locally through the grasscrete and gravel surfacing. The swales will also cater for the surface water arising from these surfaces before finally discharging to the soakaways, thus providing further treatment and source control. Additionally, the proposed clubhouse includes further SuDS features in the form of a rainwater harvesting system and a green sedum roof finish on the canopy roof.

The proposed system consisting of a number of soakaways, swales, gravel surfacing, grasscrete and a filter drain will not discharge to a local surface water drainage network. The surface water drainage system has been designed so that they promote treatment, source control and infiltration of surface water to the ground locally within the development. A high-level overflow from the soakaways to the Camac River has been proposed in the design to cater for the extreme rainfall events. Before discharging to the Camac River, the high-level overflow from the soakaways will pass through filter drain which will provide additional treatment and filtration of the surface water.

SuDS maintenance will be in accordance with SDCC guidance documents. Inspect swales during and after storms to make sure that rainwater has drained and there is no erosion. Remove sediment and debris from in and around the swale. Remove weeds and plants that do not belong. Check for any obstruction or blockage of flow along inflow areas or pipes, including trash, debris, or sediment. Silt traps have been included at the inlet into the soakaways. For maintenance of the surface water drainage system, it is recommended to annually inspect the silt traps and clean if necessary.

The proposed SuDS features for the development consisting of swales, soakaways, gravel surfacing, grasscrete and a filter drain are natural SuDS features which promote infiltration

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to the ground within the development and only discharge to the Camac River during the exceedance flood event via a high level overflow.

Both Irish Water and the Surface Water Drainage reports from the water services department have recommended no objection to the surface water drainage proposal for this development consisting of soakaways and a filter drain.

We hope the above is to your satisfaction,

Yours sincerely,

Daniel Nolan

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