

Comhairle Chontae Atha Cliath Theas

PR/1214/22

Record of Executive Business and Chief Executive's Order

Reg. Reference: SD22A/0081 **Application Date:** 21-Mar-2022
Submission Type: Additional **Registration Date:** 31-Aug-2022
Information

Correspondence Name and Address: Paul Sexton, SCEG Ltd. Unit 2, 'The Five Roads',
Jordanstown, Lusk, Dublin, K45NY74

Proposed 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

Applicant Name: Clondalkin Rugby Football Club Ltd.

Application Type: Permission

(CS)

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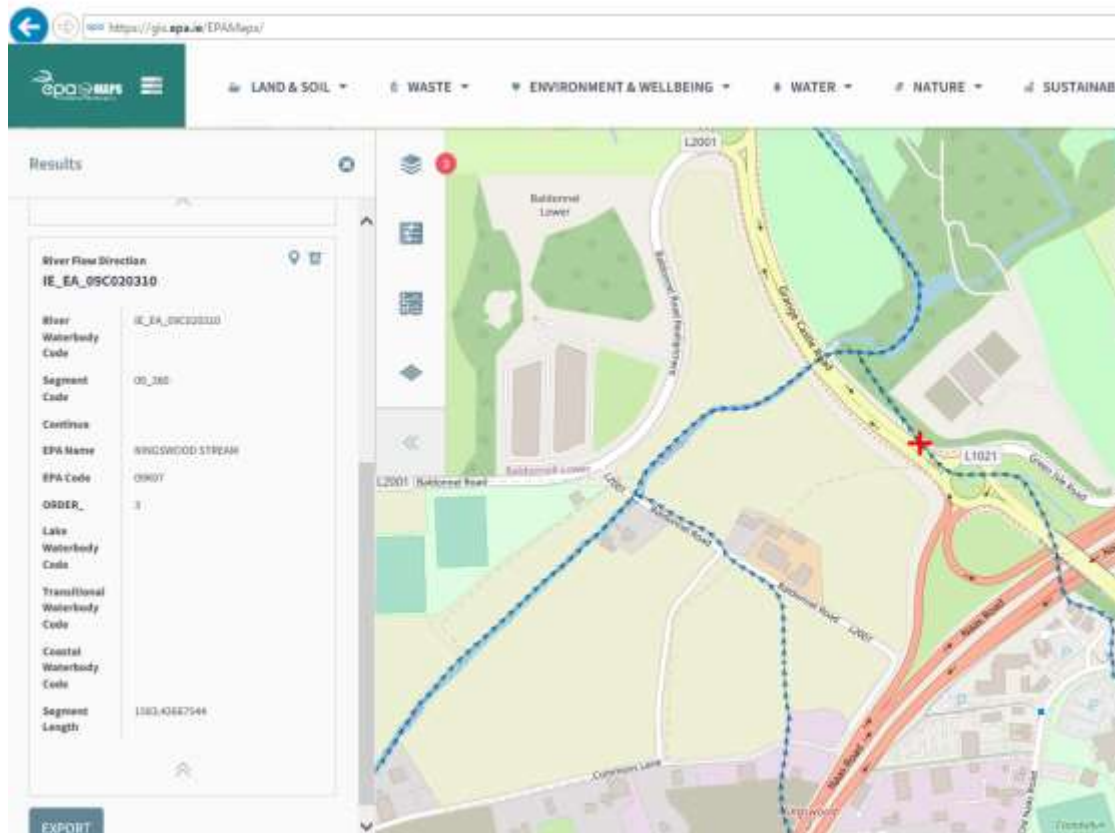
Description of Site and Surroundings:

Site Area: stated as 9.6 ha

Site Description:

The existing rugby pitches are located at Clondalkin Rugby Football Club, Gordon Park, Kingswood, Co Dublin. The proposed new location for the rugby club is located to the north-west of the existing club grounds on the opposite side of the N7 Naas Road. The new location for Clondalkin Rugby Club is located to the east of St. Francis Football Club. It is bounded by the R136 to the north-east and bounded by the N7 Naas Road slip/interchange to the south-east. It is bounded by the Baldonnell Road to the south-west.

It is noted that according to the EPA maps the River Camac is located within the subject site and bisects the site in a south-west to north-east direction. It is noted that the Kingswood Stream is located just outside of the subject site and runs parallel to the north-eastern site boundary. The Baldonnell Upper Stream bounds the site to the south-west.



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Proposal:

The proposed development comprises of the following:

- **Relocation** of the existing Clondalkin RFC grounds at Gordon Park to new lands at Kingswood Farm, Moneenalion Commons Lower Clondalkin.
- Comprising of **4 new rugby playing pitches**, including **1 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;
- 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.

Zoning:

The site is zoned Objective RU in the South Dublin County Council Development Plan 2016 – 2022 which seeks '*To protect and improve rural amenity and to provide for the development of agriculture*'.

SEA Environmental Sensitivity Screening

Overlap identified with the following layers:

- Rural 2016
- SFRA A 2016
- SFRA B 2016

Consultations:

Roads Section – **Additional Information** recommended.

Parks Department – Significant **Additional Information** recommended.

Heritage Officer – **Additional Information** recommended.

Surface Water Drainage – No objection subject to **conditions**.

Irish Water – No objection subject to **conditions**.

Irish Aviation Authority – Report received making recommendations.

Public Lighting – Concerns raised regarding lighting and lighting budget.

Waste Management – No report received to date.

Defence Forces HQ. – No report received to date.

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Submissions/Observations /Representations

None received.

Relevant Planning History

S01A/0800: Construction of a single dwelling and garage.

Decision: **GRANT PERMISSION.** Not Constructed.

Adjacent sites

SD18A/0394: Gordon Park, Kingswood, Dublin 22.

(a) Installation of two 18m high lighting columns on the northern (clubhouse) side of Pitch 1 and modern directional floodlighting for Pitch 1 from these poles and the existing 18m poles between Pitch No's 1 and 2 previously granted permission and (b) ball stop netting along the southern boundary with the Silken Park Housing Development.

Decision: **GRANT PERMISSION.**

ED17/0006: Clondalkin Rugby Football Club, Gordon Park, Kingswood, Dublin 22.

Proposal; Proposed erection of Permanent Netting Structures and supporting wooden poles in three locations on sports grounds.

Decision: **DECLARED NOT EXEMPT.**

SD14A/0032: Clondalkin Rugby Football Club, Gordon Park, Kingswood, Dublin 22.

Proposal; Single storey extension, modification and modernisation of the existing clubhouse dressing rooms, showers and changing facilities with new plantroom; replacement of existing 8 no. 10m high floodlights mainly along the southern boundary of Pitch No. 2 with modern directional floodlighting comprising four 18m high lighting columns placed at the corners of Pitch No. 2 all with associated site development and landscaping works.

Decision: **GRANT PERMISSION.**

15/6015F; Fire Safety Certificate Granted.

Relevant Enforcement History

S8177. Live case remains open.

S7761. Live case remains open.

Pre-Planning Consultation

PP102/21. 14/10/21 & 17/12/21.

Relevant Policy in South Dublin County Council Development Plan 2016 – 2022

Section 2.5.0 Rural Housing

Policy H20 Management of Single Dwellings in Rural Areas

Policy H21 Rural Housing Policies and Local Need Criteria

Policy H23 Rural Housing in HA – Dublin Mountains Zone

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*Section 2.5.7 Rural Dwelling Occupancy
Policy H26 Occupancy Condition*

Section 2.5.8 Rural House & Extension Design

*Section 3.2.0 Community Facilities
3.9.0 Sports Facilities & Centres
3.13.0 Open Space Management and Use
3.14.0 Community Infrastructure Delivery*

*Section 6.4.4 Car Parking
Policy TM7 Car Parking*

Section 7 Green Infrastructure.

*Section 7.1.0 Water Supply & Wastewater
Policy IE1 Water & Wastewater*

*Section 7.2.0 Surface Water & Groundwater
Policy IE2 Surface Water & Groundwater*

*Section 7.3.0 Flood Risk Management
Policy IE3 Flood Risk*

*Section 7.5.1 Waste and Resource Policy and Legislation
Policy IE5 Waste Management*

Section 8 Infrastructure and Environmental Quality

*Section 9.2.0 Landscapes
Policy HCL7 Landscapes*

*Policy HCL1 Heritage, Conservation and Landscapes
Policy HCL2 Archaeological Heritage*

*Section 9.3.1 Natura 2000 Sites
Policy HCL12 Natura 2000 Sites*

*Section 10.0 Energy
Policy E3 Energy Performance in Existing Buildings
Policy E4 Energy Performance in New Buildings
Table 11.18: Key Principles for Development within Enterprise and Employment Zones*

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Section 11.2.1 Design Statements

Section 11.2.7 Building Height

Section 11.2.8 Signage – Advertising, Corporate and Public Information

Table 11.19: Signage – Types of Signs, Restrictions on Use and Design Criteria

Section 11.3.4 Rural Housing

Section 11.3.4 (i) Housing Need

Section 11.3.4 (ii) Rural Housing Design

Section 11.3.4 (iii) Wastewater Treatment

Section 11.4.1 Bicycle Parking Standards

Table 11.22: Minimum Bicycle Parking Rates

Section 11.4.2 Car Parking Standards

Table 11.23: Maximum Parking Rates (Non Residential)

Section 11.4.4 Car Parking Design and Layout

Section 11.4.6 Travel Plans

Section 11.6.1 (i) Flood Risk Assessment

Section 11.6.1 (ii) Surface Water

Section 11.6.1 (iii) Sustainable Urban Drainage System (SUDS)

Section 11.6.1 (iv) Groundwater

Section 11.6.1 (v) Rainwater Harvesting

Section 11.6.1 (vi) Water Services

Section 11.6.3 Environmental Hazard Management

Section 11.6.3 (i) Air Quality

Section 11.6.3 (ii) Noise

Section 11.6.3 (iii) Lighting

Section 11.6.4 Major Accidents – Seveso Sites

Section 11.6.5 Waste Management

Section 11.7.2 Energy Performance In New Buildings

Section 11.8.1 Environmental Impact Assessment

Section 11.8.2 Appropriate Assessment

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Relevant Government Policy & Guidelines

Sustainable Rural Housing Guidelines for Planning Authorities DoEHLG (2005).

Wastewater Treatment and Disposal Systems Serving Single Houses Environmental Protection Agency (November 2009).

The Planning System and Flood Risk Management - Guidelines for Planning Authorities, Department of the Environment, Heritage and Local Government & OPW, (2009).

Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities DoEHLG (2009).

Circular SP 5/08 – Conformity with Articles 43 and 56 of European Community Treaty (Freedom of Establishment and Free Movement of Capital) DEHLG September 2008.

Assessment

The main issues for assessment relate to the following:

- Zoning and Council Policy
- Visual Impact,
- Public Lighting,
- Heritage & Environment,
- Parks and Landscaping,
- Irish Aviation Authority,
- Access & Parking,
- Services & Drainage,
- Drawings submitted
- Screening for Appropriate Assessment (AA),
- Screening for Environmental Impact Assessment (EIAR).

Zoning and Council Policy

The site is zoned Objective 'RU' in the South Dublin County Council Development Plan 2016 – 2022 which seeks '*To protect and improve rural amenity and to provide for the development of agriculture*'.

The use class 'Sports Club/Facility' is 'open for consideration' under this zoning objective as detailed in the Land Use Zoning Objectives Matrix Development Plan subject to accordance with Council policy for development in rural areas.

The application includes for 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 for a justification for the Members Bar in the

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information submitted to the Planning Authority. It is considered this may be addressed by way of a request for **Additional Information**.

Visual Impact

The proposal includes for the provision of 4 new rugby playing pitches including 1 high quality main competition pitch with modern directional floodlighting. The floodlighting system for this pitch is located to the north-east corner of the subject site. 8 floodlighting poles each 18 metres high will be located to provide illumination for this competition pitch. It is noted that the north-eastern corner of this competition pitch is located in close proximity to the Kingswood Stream and to existing mature trees. The potential impact of lighting on protected species such as bats is discussed in further detail in the Heritage & Environment and Parks & Landscaping sections of this report.

The new two storey Clubhouse Pavilion with supporting facilities including dressing rooms, physio rooms, coffee dock, committee rooms and **members bar** and lounge is located to the south-west of the subject site. The Clubhouse is a contemporary design with a flat roof and would integrate reasonably well with the character of the area and would not have a significant adverse impact on landscape or visual amenity.

The proposed **change of use of existing agricultural shed** to accommodate new two storey changing facility and storage areas is also located to the south-east of the subject site. This element of the proposal would be considered to be broadly acceptable in terms of visual impact. However, this element of the proposal would also be subject to a bat survey (protected species) as recommended in the Heritage & Environment section of this report.

The subject site is not located in close proximity to residential development and therefore will not have an adverse impact on residential amenity and visual amenity.

Public Lighting,

A report was received from the Public Lighting Section which expressed concerns regarding lighting and SDCC lighting budget. An extract taken from the report states the following:

*The spill light from the pitch lighting seems to extend beyond the pitch beyond 50m or so but I can't tell from the drawings if that would extend onto the N7 slip and cause a glare issue to traffic as the pitch spill lighting calc was not superimposed onto the layout drawings. It may be best to **condition** this possible issue under an enforcement note - should there be traffic safety issue relating to glare post installation it is incumbent on the installers/developer/owner to resolve at their own cost...?*

Separately it seems that the access roads to the new entrance are no intended to be widened or improved under this planning application. It is worth noting that neither the lower commons road nor the adjoining roads are lit. The inclusion of pitch lighting implies the intention for night time use. The car park with over 80 bays and multiple bus parking bays implies high volume usage at peak times.

Although pedestrian and cycle traffic are directed onto the R136, I would be concerned at the lack of lighting provision on the access routes to the application site.

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Should a request for additional lighting to these roads (which are in the council's charge) be made subsequent to the approval of this application due to the increased usage during the hours of darkness, it would be beyond the budget of the Public Lighting Section to facilitate.

Notwithstanding the report from Public Lighting and considering the pitch spill lighting calculations were not superimposed onto the layout drawings submitted. It is considered appropriate to request information to clarify if the spill light from the pitch lighting extends beyond the pitch onto the N7 slip which would cause a glare issue to traffic. It is considered this may be addressed by way of **Additional Information**.

Heritage & Environment,

A report was received from the Heritage Officer recommending **Additional Information** be requested regarding concerns relating to bats (protected species), lighting and ecology. An extract taken from the Heritage Officers report states the following:

The ecological survey as submitted was undertaken on 26th November 2021. It is noted that this is a time period which is inappropriate for most ecological survey work, particularly bats which are protected species. This survey timing does not facilitate a proper assessment of the current biodiversity resource on this site. It therefore also does not facilitate a considered or true assessment of the possible impact on potential protected species that may arise from the proposed development.

*I request 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 identify and addressed where necessary.*

*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. I therefore also recommend **further 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.*

Given the environmental sensitivity of the location it is considered that the above **Additional Information** regarding bats (protected species), lighting and ecology be requested.

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Parks and Landscaping,

A report was received from the Parks Department recommending Significant **Additional Information be requested** regarding concerns relating to bats (protected species), lighting, ecology, landscape, trees & hedgerows, SUDs, and proximity to the River Camac. An extract taken from the Parks report states the following:

*The Public Realm Section has assessed the proposed development in accordance with the CDP and best practice guidelines and recommends the following **additional information** be provided:*

1. Arboricultural Assessment

There are concerns about the lack of information in relation to existing trees and hedgerows within the site and within falling distance of the Proposed development. There appears to be a significant impact on trees, hedgerows and biodiversity in an area that is zoned rural. The proposal development involves the removal of mature native hedgerows and construction adjacent to existing trees and hedgerow.

The applicant shall submit and agree a comprehensive Tree and Hedgerow Report with SDCC Public Realm Section. 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*

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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.

Reason: To ensure the protection of trees to be retained on site in the interests of amenity, ecology, climate adaptation, proper planning, and sustainable development.

2. 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.

Reason: In the interests of amenity, ecology, climate action and sustainable development.

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3. 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.

Reason: To ensure the protection of the natural Heritage of the site.

4. SUDS

There is insufficient detail for SuDS (Sustainable Drainage System) shown for the proposed development. Further natural SUDS features shall be incorporated into the proposed drainage system and a strategy provided. The SUDS shall 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 shall 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 shall provide the following:

- The applicant shall 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.

REASON: In the interest of Amenity, biodiversity, water quality and attenuation; compliance with Development Plan Policy; the provision, establishment, and maintenance of a reasonable standard of blue-green infrastructure and proper planning and sustainable development of the area.

4. 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.*

Summary

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.

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*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.*

Given the environmental sensitivity of the location it is considered that the above **Additional** be requested.

Irish Aviation Authority,

A report was received from the Irish Aviation Authority requiring engagement with the applicant regarding the use of cranes for construction works to screen out any adverse impact on the safety of flight operations at Casement Aerodrome. An extract taken from the Irish Aviation Authority report states the following:

The applicant should be required to engage with the Property Management Branch of the Department of Defence to undertake a preliminary screening assessment to confirm that the proposed development and any associated cranes that would be utilised during its construction would have no impact on the safety of flight operations at Casement Aerodrome."

It is considered appropriate to attach the above as a **condition** in the event of a grant of permission.

Access & Parking,

A report was received from the Roads Section recommending **Additional Information** be requested. An extract taken from the Roads report states the following:

Prior to commencement of any works in the public domain, and in order to comply with The Roads Act 1993 Section 13 Paragraph 10, a Road Opening Licence must be secured from South Dublin County Council, Roads Maintenance Department.

Description:

- *Cycle track and pedestrian access and stairs off the R136*
- *Bicycle shelter*
- *Electrical car charging stations*
- *Vehicle parking*
- *Vehicle entrance off the Old Country Roadway.*

R136 Pedestrian Entrance/Stairs:

- *Details required of proposed stairs specification (materials, finishes, hand railings, lighting, gate, gradients, etc).*
- *Plan drawing, section drawing and structural drawings (including rebar schedules where applicable).*
- *Preventive railing at top of stairs (Noting the 7m level difference between top and bottom).*

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- *Confirmation in writing that permission has been granted from SDCC Development Department to create an entrance using council land.*

R136 Bicycle Access & path through field:

- *Public lighting to be provided along any darkened sections of path.*
- *Confirmation in writing that permission has been granted from SDCC Development Department to create an entrance using council land.*

Country Lane – Road Traffic & Road Geometry:

Need a text rationale to accompany/explain the traffic movements as per the drawings; where the narrow lane widths (4.5m in places) occur in particular.

Main Entrance:

As per Pre-Planning guidance issued by the Roads department, the proposed entrance is now located at right angles to the main road, and there is only one entrance proposed.

Internal Road Layout:

Swept path drawing required demonstrating Bus(53-seater) & Emergency vehicles/Bin truck movements through the site, including bus parking movements.

Corner radii have been designed as per Pre-Planning guidance and adequately dimensioned.

Car Parking (Location is Zone 1):

5% of vehicular parking spaces for mobility impaired users, and 10% vehicular parking spaces to be equipped with electrical charging points, REASON: In the interest of sustainable transport.

92 carpark spaces are proposed in total (84 standard, 4 mobility impaired, 4 family).

8 of the 92 are proposed with EV charging points (10 are required).

4 of the 92 are proposed as mobility impaired spaces (5 are required).

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As per CDP 2016-22 11.4.2 car parking standards, the maximum parking rates applicable are 15 per pitch; 1 per 20sq.m of GFA

Max Parking Spaces		
Pitches	15 per pitch	Carpark spaces
5	15	75
Clubhouse		
GFA	1 per 20sq.m	
330		17
	Total	92

The proposed number of spaces (88 + 4 mobility) equals the max rate which is acceptable to the Roads Department.

1624	Car Park Calculation	no.		Total units	Total Needed		total Provided
	Pitches	15	sp./pitch	4	60	spaces	73
	Training strip	15	sp./pitch	1	15	spaces	15
	Total Parking Spaces				75		88

The proposed development shall make provision for the charging of electric vehicles. In the case of on-surface parking, 100% of spaces must be provided with electrical connections, to allow for the provision of future charging points. In the case of surface car parking spaces and basement car parking spaces, 100% of spaces must be provided with electrical ducting and termination points to allow for the provision of future charging points, and 10% of surface car parking spaces must be provided with electric vehicle charging points initially. Details of how it is proposed to comply with these requirements including details of the design of, and signage for, the electric charging points (where they are not in areas to be taken in charge) shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. REASON: In the interest of sustainable transport.

Car parking spaces dedicated for electrical charging shall be demarcated with "RRM 034" as per Traffic Signs Manual Road Markings – Chapter 7

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Bicycle Parking:

The number of bicycle spaces proposed exceeds the minimum required.

1624	Bicycle Parking	no.	Total units	Total Needed		total Provided
Pitches		4	sp/pitch 4	16	spaces	27
Clubhouse		1	site/eqn. 601.15	12	spaces	12
Training Areas		4	sp/pitch 1	4	spaces	1
Total Bicycle Spaces				32		40

Bin Storage:

Proposed bin storage locations have good access.

Site coverage

The site coverage is 1.14% which is not dissimilar to site coverage values in agricultural settings.

Bin Storage Standards

Bins have been provided for in area. One bin area is located behind the existing agricultural shed that is scheduled to be repurposed as a changing facility (1). A second area (2) is located close to the unused agricultural shed at the front of the site. Bins can be placed there at regular bin collection times to ensure bin truck minimal interaction with on site traffic.



Public Lighting:

Prior to the commencement of development, the applicant shall agree in writing a public and site lighting scheme with South Dublin County Council Lighting Department. Once agreed, the scheme shall be constructed/installed to taking in charge standards at the expense of the developer and to the satisfaction of South Dublin County Council Lighting Department.

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Taking in Charge:

All items and areas for taking in charge shall be undertaken to a taking in charge standard. Prior to development the applicant shall submit construction details of all items to be taken in charge

Roads recommends that **additional information** be requested from the applicant:

1. *Applicant to submit a 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. *Applicant to submit further detail re proposed cycle track/entrance:*
 - a. *Public lighting to be provided along any darkened sections of path.*
 - b. *Confirmation in writing that permission has been granted from SDCC Development Department to create an entrance using council land.*
3. *Applicant to submit further detail re 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. *Applicant to submit swept path analysis (AutoTRAK) drawing demonstrating bus coach & emergency vehicle/bin truck movements through the site, including bus coach parking movements.*
5. *Applicant to submit 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. *Applicant to submit a Taking in Charge drawing showing any areas that are to be offered to the local authority for Taking in Charge.*

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Should the permission be granted, the following conditions are suggested:

1. *The boundary walls at vehicle access points shall be limited to a maximum height of 0.9m, and any boundary pillars shall be limited to a maximum height of 1.2m, in order to improve forward visibility for vehicles.*
2. *Any gates shall open inwards and not outwards over the public domain.*
3. *The entrance apron shall be dished and widened to the full width of the proposed widened driveway entrance and shall be constructed to the satisfaction of South Dublin County Council's Road Maintenance Department, and at the applicant's expense.*

It is considered appropriate to request the above **Additional Information** recommended by the Roads Section.

Services & Drainage,

Both Irish Water and Surface Water Drainage reports have recommended no objection subject to **conditions**. An extract taken from the Irish Water report states the following:

IW Recommendation:

No Objection

1 Water

1.1 Prior to the commencement of development the applicant or developer shall enter into a water connection agreement(s) with Irish Water.

All development shall be carried out in compliance with Irish Water Standards codes and practices.

Reason: In the interest of public health and to ensure adequate water facilities.

2 Foul

2.1 Prior to the commencement of development the applicant or developer shall enter into waste water connection agreement(s) with Irish Water.

All development shall be carried out in compliance with Irish Water Standards codes and practices

Reason: In the interest of public health and to ensure adequate water facilities.

It is considered appropriate to attach the above **conditions** in the event of a grant.

An extract taken from the Surface Water Drainage report states the following:

Surface Water Report: No Objection:

Flood Risk No Objection:

All works for this development shall comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works.

Water Report: Referred to IW

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Foul Drainage Report: Referred to IW

It is considered appropriate to attach the above **conditions** in the event of a grant.

Drawings submitted

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 should be requested to submit such a drawing.

Screening for Appropriate Assessment (AA)

The subject site is not located within nor within close proximity to a European site. The proposed development is located within an established residential area and comprises of a house extension. Having regard to:

- the small scale and domestic nature of the development,
- the location of the development in a serviced urban area, and
- the consequent absence of a pathway to the European site,

it is considered that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on the Natura 2000 network and appropriate assessment is not therefore required.

Screening for Environmental Impact Assessment (EIAR)

Having regard to the modest nature of the proposed development, and the distance of the site from nearby sensitive receptors, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

Other Considerations

Development Contributions

SEA Monitoring Information	
Building Use Type Proposed	Floor Area (sq.m)
Sports Facility – Rugby Club House & Pitches	963sq.m. (as stated)
Land Type	Site Area
Greenfield	Stated as 9.6 ha

Conclusion

Further Information required.

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Recommendation

Further Information

- Further Information was requested on 16/05/2022.
- Further Information was received on 31/08/2022.

No submissions/observations on the further information have been made.

Further information

The following Further Information was requested.

Item 1: Roads Requirements

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.

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Item 2: Heritage

(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.

Item 3: Parks & Landscaping.

(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.

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- (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.

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(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.

Item 4: Members Bar.

(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.

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Item 5: Public Lighting

(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.

Further Consultations

Parks Department – **Clarification of Additional Information** recommended.

Public Lighting – **Clarification of Additional Information** recommended.

Surface Water Drainage – No objection subject to **conditions**.

Irish Water – No objection subject to **conditions**.

Roads Department – No objection subject to **conditions**.

Heritage Officer – **Clarification of Additional Information** recommended.

Further Submissions/Observations

None received.

Assessment

Item 1: Roads Requirements

The applicant has submitted a cover letter and revised drawings in an attempt to address the request for additional information. An extract taken from the cover letter submitted states the following:

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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 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 be designed and installed in accordance with the Health and Safety Authority's *Code of Practice for the Design and Installation of Anchors*.

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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.

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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.

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.

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To give a more tangible example of the type of farm vehicle, in this case a tractor unit, that may be 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.

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:

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

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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.

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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 spaces 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.

The Roads Department reviewed the additional information submitted and issued a report recommending no objections subject to **conditions**. An extract taken from the Roads report states the following:

Applicant Submitted Response:

1.

(1) Submission satisfactory

(a) Detailed calculations to be conditioned – Submission satisfactory

(b) Submission satisfactory

(c) Submission satisfactory

2.

(2) Further detail regarding proposed cycle track/entrance:

(a) (a) Public lighting to be provided along any darkened sections of path

A lighting provision has been included as was requested. Council to reserve the right to request the applicant to increase the brightness of the lighting if such a need exists.

(b) Submission satisfactory

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3. *A detailed note was received – Roads deem the rationale used acceptable*
4. *Detailed drawings were received and are satisfactory to Roads Dept.*

5. (a) *Submission satisfactory*
(b) *Submission satisfactory*
(c) *Submission satisfactory*

6.

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.

The stairs descending from the R136 (Outer Ring Rd) to the proposed development will be situated outside the scope of the development (outside the redline) and will not be offered for TIC – Satisfactory.

Roads Department Assessment:

Roads Department is satisfied with the applicant's additional information.

No Roads objections subject to the following conditions:

1. *Council to reserve the right to request the applicant to increase the brightness of the public lighting in secluded areas should such a need arise.*

The Planning Authority considers the applicant has satisfactorily responded to the request for additional information for this item. It is considered appropriate to attach the above **condition** in the event of a grant of permission.

Item 2: Heritage

The applicant has submitted a cover letter and information in an attempt to address the request for additional information. An extract taken from the cover letter submitted states the following:

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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 (<i>Nyctalus leisleri</i>)	X	✓	✓
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	X	✓	✓
Common Pipistrelle (<i>Pipistrellus pipistrellus</i>)	X	✓	✓
Whiskered (<i>Myotis mystacinus</i>)	X	✓	✓
Daubenton's (<i>Myotis daubentonii</i>)	X	✓	✓
Nathusius' Pipistrelle (<i>Pipistrellus nathusii</i>)	X	✓	✓
Natterer's bat (<i>Myotis nattereri</i>)	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 Synergy 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

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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_EcIA-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.

SDCC Heritage Officer has reviewed the information submitted and has issued a report recommending Clarification of Additional Information regarding concerns for bats and lighting. An extract taken from the Heritage Officers report states the following:

I make the following comments on the Bat report, however, and I highlight a significant concern that remains in terms of the proposed need for evening and night time lighting on the proposed development site:

The report records the presence of 7 bat species foraging and commuting across the proposed development site. It is to be noted that this is an unprecedented record for South Dublin County in the context of other planning proposals in the County. The records for three species that are noted as of County Importance is also significant, and in this context the concluding evaluation for the site being of Local Importance for bat populations is an under-estimation and it is to be disputed.

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The Bat report indicates that the Lighting Plan as submitted for the proposed development was developed independently to the Bat Report, and it was prepared in advance of the bat survey and assessment. The true nature of the impact on bats arising from the proposed lighting plan has therefore not been assessed.

Given the nature of the proposed use and activities on the site, impact from evening and night time lighting is likely to have significant impact on light sensitive species, even with the incorporation of some design mitigation and avoidance measures.

***Clarification** of the issue of lighting and bats is therefore requested. The proposed lighting plan as submitted is to be assessed in conjunction with the bat expert, and a true and fair evaluation of impact from proposed lighting on the significant range of bat species is required to be undertaken. As an appropriate mitigation measure, focus is to be directed at retaining a dark corridor along the southern and western boundaries of the site in particular. This may require the alteration of the current design and/or the exclusion of use of any lighting proposals in these areas. This will be essential to retain a green infrastructure (GI) corridor through the current proposed lands for bats and to retain a GI corridor through the wider landscape for this range of protected species.*

It is considered appropriate to request the above by way of **Clarification of Additional Information.**

Item 3: Parks & Landscaping

The applicant has submitted a cover letter and information in an attempt to address the request for additional information. An extract taken from the cover letter submitted states the following:

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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

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Directors: Paul Sexton, BA, BA, MSc, MPhil, MRSM, CEng, Chartered Engineer, & Catherine Sexton, BA, Dip (Commerce)

- (iii) 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.

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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.

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.

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.

The Parks Department reviewed the additional information submitted and issued a report recommending **Clarification of Additional Information**. An extract taken from the Parks report states the following:

Recommendation: *Clarification of ADDITIONAL INFORMATION*
Site Area: *9.6 ha*
Zoning: *To protect and improve rural amenity and to provide for the development of agriculture*

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Main Concerns:

- *Significant impact on trees, hedgerows and biodiversity in the area including excessive fragmentation of the existing green infrastructure. The removal of hedgerows is considered excessive and damaging to the wider Green Infrastructure. The applicant is attempting to cram too much into the site, and this can only be achieved by the removal of trees and hedgerows which are important Green Infrastructure links. The proposals are causing excessive fragmentation and mitigation measures are not sufficient.*
- *Potential impacts on bats – significant lighting proposed. Significant habitat loss (potential roosting/foraging/commuting bats)*
- *Likelihood that additional lighting may be required on access road which would further damage an important dark zone*
- *Impact on Camac River and Baldonnell Upper Stream. The minimum 10-meter vegetated strip required as a setback has not been provided. Given that these are important Green Infrastructure links this 10-meter minimum setback is not considered sufficient to strengthen the GI corridor and it should be further expanded*

Relevant Sections, Policies and Objectives of the SDCC Development Plan 2016-2022:

Chapter 7 INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE)

Policy 2 Surface Water & Groundwater

It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.

IE2 Objective 3: To maintain and enhance existing surface water drainage systems in the County and promote and facilitate the development of Sustainable Urban Drainage Systems (SUDS), including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.

IE2 Objective 5: To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SUDS) and avoid the use of underground attenuation and storage tanks.

IE2 Objective 9: To protect water bodies and watercourses, including rivers, streams, associated undeveloped riparian strips, wetlands, and natural floodplains, within the County from inappropriate development. This will include protection buffers in riverine and wetland areas as appropriate (see also Policy G3 Objective 2 – Biodiversity Protection Zone).

Chapter 8 GREEN INFRASTRUCTURE & ENVIRONMENTAL QUALITY (IE)

Policy 2 Green Infrastructure Network

G2 Objective 1: To reduce fragmentation of the Green Infrastructure network and strengthen ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional Green Infrastructure network

G2 Objective 2: To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

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G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands, and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within the design proposals and supporting their integration into the Green Infrastructure Network.

G2 objective 11: To incorporate appropriate elements of Green Infrastructure e.g., new tree planting etc. into existing areas of hard infrastructure wherever possible.

G2 Objective 13: To seek to prevent the loss of woodlands, hedgerows, aquatic habitats, and wetlands wherever possible including requiring a programme to monitor and restrict the spread of invasive species

Policy 3 Watercourses Network

It is the policy of the Council to promote the natural, historical and amenity value of the County's watercourses; to address the long term management and protection of these corridors and to strengthen links at a regional level.

G3 Objective 2: To maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy, 2015; the Greater Dublin Area Strategic Cycle Network; and other government plans or programmes will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments, as these routes increase the accessibility of the Green Infrastructure network.

Policy 4 Public Open Space Hierarchy and Landscape Setting

G4 Objective 2: To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.

Chapter 9 HERITAGE CONSERVATION AND LANDSCAPES

Policy 15 Non-Designated Areas

HCL15 Objective 3: To protect existing trees, hedgerows, and woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.

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Living with Trees – Tree Management Policy 2015 – 2020

South Dublin County Council's Tree Management Policy 'Living with Trees' 2015-2020 contains information within Chapter 7 Trees and Development that relates to the retention, protection and planting of trees on development sites. Relevant points within this section include:

- The Council will use its powers to ensure that where it is conducive with the objectives of the County Development Plan, and other planning objectives there is maximum retention of trees on new development sites.
- In the processing of planning applications, the Council will seek the retention of trees of high amenity / environmental value taking consideration of both their individual merit and their interaction as part of a group or broader landscape feature.
- On construction sites all work must be in accordance with British Standard 5837 (2012): Trees in Relation to Design, Demolition and Construction – Recommendations.
- The Council will promote the replacement of trees removed to facilitate approved planning and development of urban spaces, buildings, streets, roads, infrastructural projects and private development sites.

The Public Realm Section has assessed the proposed development in accordance with the CDP and best practice guidelines and recommends the following significant additional information be provided:

1. Arboricultural Impact

- i) The removal of hedgerows is considered excessive. **Important hedgerows could be retained if the northwestern most training pitch (70 x 107m) was removed from the plans and the other pitches realigned.** Additional Information required to show retention of hedgerows on site.

Reason: To ensure the protection of trees to be retained on site in the interests of amenity, ecology, climate adaptation, proper planning, and sustainable development.

SIGNIFICANT ADDITIONAL INFORMATION

1. Landscape /Blue-Green Infrastructure

There are concerns with the lack of protection and enhancement of Green Infrastructure on the site. The applicant is requested to provide a fully detailed landscaping scheme for the proposed development.

- i) The applicant should provide 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.
- ii) The landscape Plan shall include hard and soft landscaping including levels, sections/elevations and details, detailed design of SUDs features including swales, permeable paving, green roofs, and integrated tree pits etc.

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- iii) The applicant should propose a 10m vegetated strip along all watercourses and this should not include paths or other infrastructure. The northwestern training pitch comes right up to this 10 meter riparian zone. There is no space for a runoff, and it is most likely that that zone would be heavily and negatively impacted by use of the pitch.*
- iv) The applicant should show the retention of existing hedgerows except where necessary for site access , mitigation planting for any proposed tree and hedgerow removal; protection of trees and hedgerows to be retained; 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.*
- v) Existing green infrastructure links should be maintained.*

Reason: In the interests of amenity, ecology, climate action and sustainable development.

SIGNIFICANT ADDITIONAL INFORMATION

Summary

The Public Realm Section has concerns about the impact of the development on GI including 2 watercourses, existing trees, and hedgerows and on habitats for bats.

The Public Realm Section is requesting that the applicant provide a clarification of additional information such that the development demonstrates the protection of watercourses, hedgerows and trees and compliance with the policies and objectives of the County Development Plan.

The Planning Authority considers the applicant has not satisfactorily responded to the request for additional information for this item. It is considered appropriate to request **Clarification of Additional Information** for the above items.

Following verbal clarification from the Public Realm section the relevant pitch to be omitted is the pitch in the northern half of the site and along the east side abutting the Outer ring road (rather than the Training Pitch) on the north west of the site.

Item 4: Members Bar.

The applicant has submitted a cover letter and information in an attempt to address the request for additional information. An extract taken from the cover letter submitted states the following:

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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, its 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

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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.

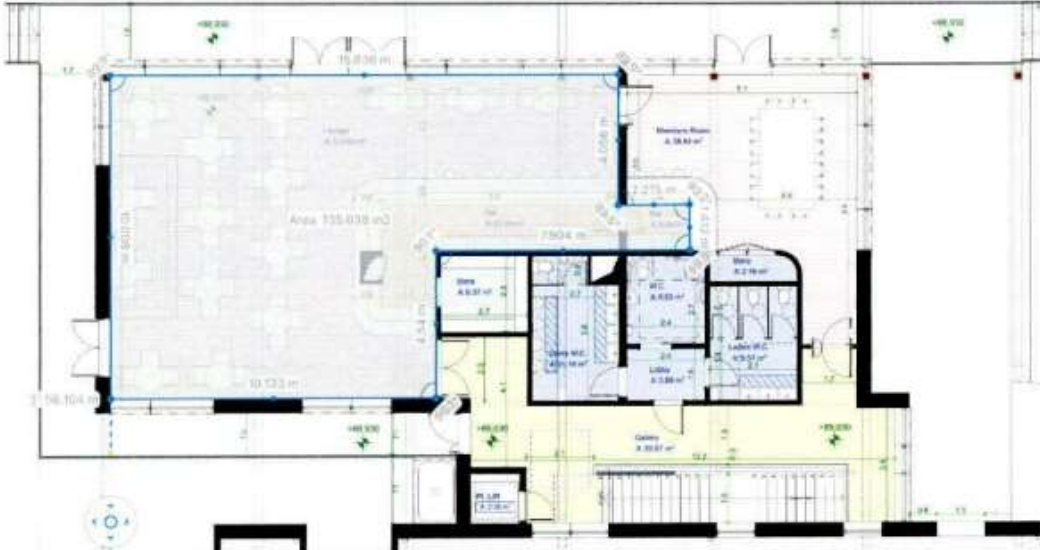


Fig.8: 'Members Bar' First Floor Area Calculation

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 will effectively serve as the Club's Function Room, where wider member meetings and annual Club celebrations can be held.

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)

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The Planning Authority considers the applicant has satisfactorily responded to the request for additional information for this item.

Item 5: Public Lighting

The applicant has submitted a cover letter and information in an attempt to address the request for additional information. An extract taken from the cover letter submitted states the following:

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 than 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 significance from a risk perspective.

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.

SDCC Public Lighting have reviewed the Additional Information submitted and issued a report recommending **Clarification of Additional Information**. An extract taken from the Public Lighting report states the following:

I have attached my previous comments on this application above.

I have reviewed both the sports lighting and the site (car park & cycle way) lighting. I have also reviewed the Bat Activity Assessment. It seems the Bat Survey and Report was published in July 2022 and the Sport lighting was submitted in March earlier in the year. I suggest that the Sport Lighting Design be reviewed in line with the guidelines of the Bat Report and be re-submitted. Similarly, the Car Park and Cycle Way Lighting Design is dated June 2021 and, in some areas, directly contravenes the requirements of the Bat Report. I recommend that the developers review these submissions and re-submit a cohesive lighting plan. Any lighting submission showing the Spill Light Calculation should overlay both the Sports lighting and the site lighting for a realistic view of the proposal on the environment.

More detail is required on the lighting proposed where the Cycle way joins the existing Cycle way on the R136. Is the new section of cycleway in the tree planted area to be TIC by SDCC? If so, is

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any lighting proposed in line with the SDCC PL specifications? I am unable to see from the submission if this is the case. There is also no mention of the existing lighting provision on the R136, I must assume therefore that the new entrances onto the R136 will not require any re-location of existing poles or tie-ins to supplies for additional poles to lighting the new section of Cycleways.

Lastly the existing lighting along the access routes to the new entrance to the clubhouse and carpark is sporadic and insufficient to adequately light the additional traffic associated with the new development. I recommend that the lighting along the roads accessing the new development be considered for an appropriate upgrade of the street lighting provision.

The Planning Authority considers the applicant has not satisfactorily responded to the request for additional information for this item. It is considered appropriate to request **Clarification of Additional Information** on the above items in the Public Lighting report.

Other Considerations

Development Contributions

- Clubhouse including members bar, changing facilities measures c.963sq.m.
- Assessable area is nil.

SEA Monitoring Information	
Building Use Type Proposed	Floor Area (sq.m)
Sports Facility – Rugby Club House & Pitches	963sq.m. (as stated)
Land Type	Site Area
Greenfield	Stated as 9.6 ha

Conclusion

Request **Clarification of Additional Information** on the following items:

- Parks Requirements.
- Public Lighting Requirements.
- Heritage Requirements.

Recommendation

I recommend that **CLARIFICATION OF ADDITIONAL INFORMATION** be requested from the applicant with regard to the following:

1. (a). Bat Survey and Report was published in July 2022 and the Sport lighting was submitted in March earlier in the year. The applicant is requested to review the Sport Lighting Design in line with the guidelines of the Bat Survey and Report and to resubmit this to the Planning Authority.
(b). The Car Park and Cycle Way Lighting Design is dated June 2021 and in some areas

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directly contravenes the requirements of the Bat Report. The applicant is requested to review these submissions and resubmit a cohesive lighting plan. Any lighting submission showing the Spill Light Calculation should overlay both the Sports lighting and the site lighting for a realistic view of the proposal on the environment.

(c). The applicant is requested to submit more detail on the lighting proposed where the Cycle way joins the existing Cycle way on the R136 and to clarify if the new section of cycleway in the tree planted area is to be Taken In Charge by SDCC. If so the applicant is requested to clarify that any lighting proposed is in line with the SDCC Public Lighting specifications.

(d). There is no mention of the existing lighting provision on the R136. The applicant is requested to clarify if the new entrances onto the R136 will require any relocation of existing poles or tie-ins to supplies for additional poles to lighting the new section of Cycleways.

(e). The existing lighting along the access routes to the new entrance to the clubhouse and carpark is sporadic and insufficient to adequately light the additional traffic associated with the new development. The applicant is therefore requested to liaise with SDCC Public Lighting and Public Realm Section regarding consideration for an appropriate upgrade of the street lighting provision along the roads accessing the new development that will not have a significant adverse impact on bat species.

2. The applicant is requested to submit the following information regarding the requirements of the Public Realm Section:

(a). The removal of hedgerows is considered excessive. Important hedgerows could be retained if the pitch in the northern half of the site which is along the east side of the site abutting the Outer ring road is omitted from the plans and the other pitches realigned. The applicant is requested to submit a revised drawing showing this pitch omitted and to clearly show retention of hedgerows on site.

(b). There are concerns with the lack of protection and enhancement of Green Infrastructure on the site. The applicant is requested to provide a fully detailed landscaping scheme for the proposed development.

i) The applicant should provide 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.

ii) The landscape Plan shall include hard and soft landscaping including levels, sections/elevations and details, detailed design of SUDs features including swales, permeable paving, green roofs and integrated tree pits etc.

iii) The applicant should propose a 10m vegetated strip along all watercourses and this should not include paths or other infrastructure. The northwestern training pitch comes right up to this 10 meter riparian zone. There is no space for a runoff and it is most likely that that zone would be heavily and negatively impacted by use of the pitch.

iv) The applicant should show the retention of existing hedgerows except where necessary for site access, mitigation planting for any proposed tree and hedgerow removal; protection of trees and hedgerows to be retained; enhancement of existing hedgerows; additional infill planting; creation of new habitat; integration of SuDS features into the

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landscape; boundary planting. There should be a net gain of trees and hedgerow.

v) Existing green infrastructure links should be maintained.

3. The Heritage Officer has a significant concern that remains in terms of the proposed need for evening and night time lighting on the proposed development site. The applicant is therefore requested to clarify the issue of lighting and bats. The proposed lighting plan as submitted is to be assessed in conjunction with the bat expert, and a true and fair evaluation of impact from proposed lighting on the significant range of bat species is required to be undertaken. As an appropriate mitigation measure, focus is to be directed at retaining a dark corridor along the southern and western boundaries of the site in particular. This may require the alteration of the current design and/or the exclusion of use of any lighting proposals in these areas. This will be essential to retain a green infrastructure (GI) corridor through the current proposed lands for bats and to retain a GI corridor through the wider landscape for this range of protected species.

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REG. REF. SD22A/0081

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



**Deirdre Kirwan,
Senior Executive Planner**

ORDER: I direct that **CLARIFICATION OF ADDITIONAL INFORMATION** be requested from the applicant as set out in the above report and that notice thereof be served on the applicant.

Dated: 27/09/22



Gormla O'Corrain, Senior Planner