



# SEXTON CONSULTING

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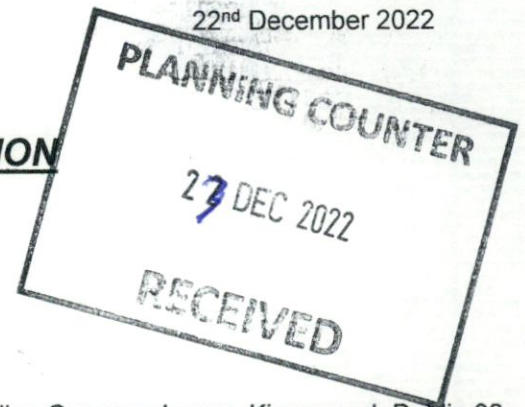
Our Ref. SC04/21020

22<sup>nd</sup> December 2022

## CLARIFICATION OF ADDITIONAL INFORMATION

**REGISTER REF.:**

**SD22A/0081**

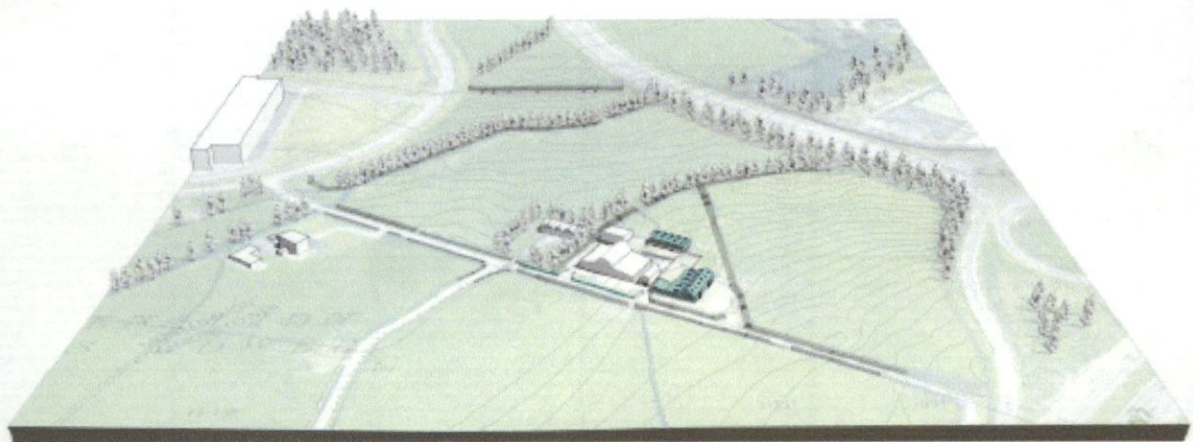


**LOCATION:**

Kingswood Farm, Moneenalion Common Lower, Kingswood, Dublin 22

**APPLICANT:**

Clondalkin Rugby Football Club Ltd



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

Dear Sir/ Madam

On behalf of our client, Clondalkin Rugby Football Club, we wish to respond to your letter dated 28<sup>th</sup> September 2022, requesting *Clarification of Additional Information* (hereafter "CAI") in respect of the proposed planning application under your register reference SD22A/0081 at Kingswood Farm, Moneenalion Common Lower, Kingswood, Dublin 22, and as extended by your correspondence dated 17<sup>th</sup> October 2022.

The CAI request comprises 3 No. items which are essentially requests for clarifications raised by the Public Lighting Department, the Public Realm Department and the Heritage Officer, respectively, but with some overlap of concerns about various aspects of the proposed development.

We have consulted with our Design Team subject matter experts, particularly the Lighting Designer and Ecologists and they have agreed that the scheme can be greatly enhanced by (i) re-orientating the Training Pitches in the middle field and (ii) translating of the main competition Pitch to allow retention of the exiting mature tree and hedge line in the north west corner, and that was previously marked for removal, while at the same time effectively moving the floodlighting source further away from the sensitive Cammock River habitat. A direct comparison of the two schemes is as follows:



**Fig. 2.1: Site Layout Proposal submitted with AI Response 31.08.2022**



**Fig. 2.2: Site Layout Proposal submitted with CAI Response 22.12.2022**

For larger, (1/500 scale), drawings refer to the Site Plan by Cummins & Voortman Architects Drawing No. A.03.05.1.1 dated 18.08.2022 submitted with the AI Response (31/08/2022) and the revised Site & Landscaping Plan by Cummins & Voortman Architects Drawing No. A.03.06.1. dated 21.12.2022 attached to this submission.

Firstly, these pictorial views show the improved design development where the Green Infrastructure has been enhanced along with more continuous connection along all water courses simply by omitting the designated training area in the middle field and re-orientating the Training Pitches, facilitating better isolation of the riparian strip along the river, enhancement of the Green & Blue Landscaping Strategy and planting specification in this area with consequently inherently less likelihood of overrun from playing activities into this zone. The re-orientation of the pitches has had a knock on effect on the cycle path, however, in hindsight, this has enabled a better more graduated approach to the lighting and landscaping designs and ecological protection overall.

Secondly, the principal changes between these two scheme are that the Competition Pitch has been moved directly to the South by approximately 5m and to the East by approximately 3m which has allowed the retention of the mature treeline and a significant amount of existing hedgerow.



**Fig.3: Competition Pitch Translations from AI Scheme to CAI Scheme**

As a result, we are pleased to clarify the issues raised in the CAI and enclose the following supporting additional drawings and documents to this end which we trust are self-explanatory:

- 1) 6 No. Copies of letter from Lighting Designer, Conor O'Byrne of *WINK Lighting*, with DaLUX Lighting Calculation Report Ref. 22112, dated 19<sup>th</sup> December 2022 which includes and is complimentary and ancillary to the CalculuX Floodlighting calculations for the Main Competition Pitch, dated 30<sup>th</sup> June 2022; by the *Phillips* Lighting Application Specialist Team of flood lighting designer's, *Signify Energy UK*, (previously issued as part of the AI submission of 31<sup>st</sup> August 2022;
- 2) 6 No. copies of A1 size '*Lighting Calculation 'Heatmap' Drawing*' (NTS) by Wink Lighting Ltd;
- 3) 6 No. Copies of a letter from Senior Ecologist & Bat Specialist, Daniel Connell, of VEON (Forestry, Ecology & Environmental) Ltd; clarifying their expert opinion that the lighting levels that the designed measures should be sufficient to avoid impacts from the project, such as direct loss, fragmentation, disturbance, and lighting, to any foraging and/or commuting bats that may be present on site;

- 4) 6 No. copies of a letter from Arborist Ethan Gannon of VEON (Forestry, Ecology & Environmental) Ltd that there will be ample protection provided for existing and future vegetation, and that the removal of any vegetation will be more than supplemented by the native tree planting specified on the Architects Drawings and Landscaping Report;
- 5) 6 No. copies of A3 size 'Tree Protection Plan' (NTS) for the site by VEON (Forestry, Ecology & Environmental) Ltd, which has been updated to reflect the revised pitch locations and orientations;
- 6) 6 No. copies of a letter from Ecologist Dr Ross Donnelly-Swift of Panther Environmental Services Ltd dated 21<sup>st</sup> December 2022 in asserting their guidance in respect to the proposals and their agreement on the ecological aspects of the scheme;
- 7) 6 No. copies each of the following drawings as described by Cummins & Voortman Ltd, Sustainable Architecture & Urban Designers:
  - o Drawing No. A.03.06.1 showing "Site Layout/ Landscaping Plan" at Scale 1:500 (A0 format)
  - o Drawing No. A.03.06.3 showing "G & B Plan – Proposed / Green & Blue Site Layout Strategy as Proposed" at scale 1:2000 (A3 format)
  - o Drawing No. A.03.06.4 showing "G & B Plan – Hedges / Green & Blue Site Landscaping – Hedges Proposed" at Scale 1:2000 (A3 format), including quantities

These drawings and documents have been co-ordinated between the various subject matter specialists as they confirm in their various correspondences and while we believe that these documents in and of themselves will be self-explanatory we set out below a brief summary of our overall response as it pertains to each item of the CAI requested:

#### ITEM 1 – PUBLIC LIGHTING

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 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 Cycleway 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.

#### RESPONSE:

During our formulation of the AI Submission response the various subject matter experts did liaise during their consideration of the various aspects of the proposed development relevant to them however we acknowledge that there were some ambiguities and perhaps inconsistencies arising albeit not intentional.

Consequently, with the additional work done since receipt of the CAI, we are pleased to report that everything is now more coherent and co-ordinated.

Regarding the existing Public Street Lighting along the R136 we did note in our AI response the following:

*“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 B 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.”*

Refer to Appendix B in our response to AI Request, dated 31<sup>st</sup> August 2022, which includes scale 1:200 snips (on the A4 page) for the additional survey detail gathered in these locations and where we highlighted existing LP locations. These survey snips are reproduced here for convenience, albeit not to scale here:

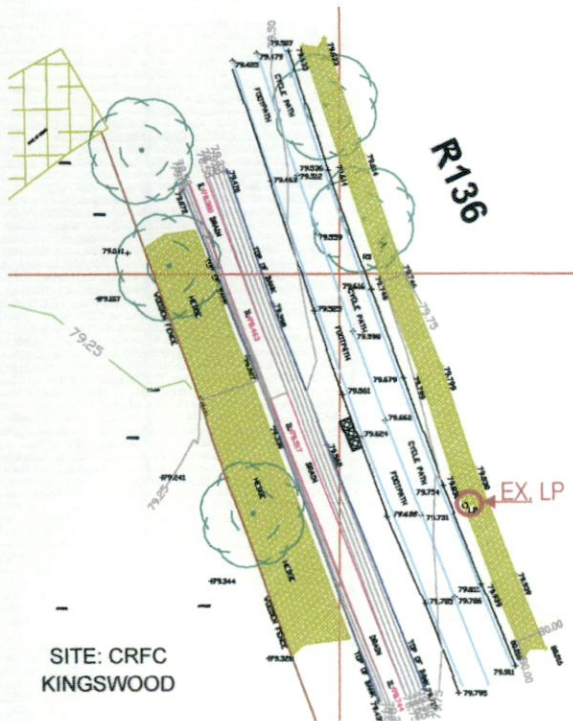


Fig. 4.1 PROPOSED CYCLE TRACK ACCESS OFF R136:

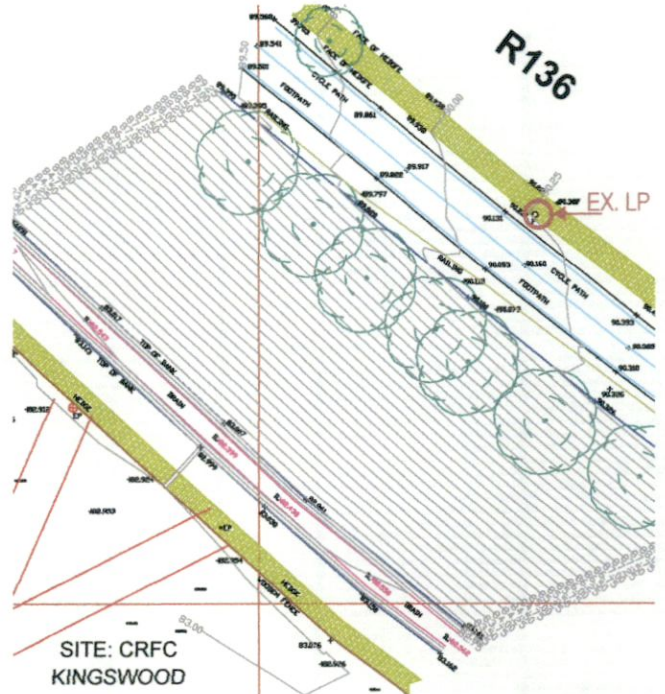


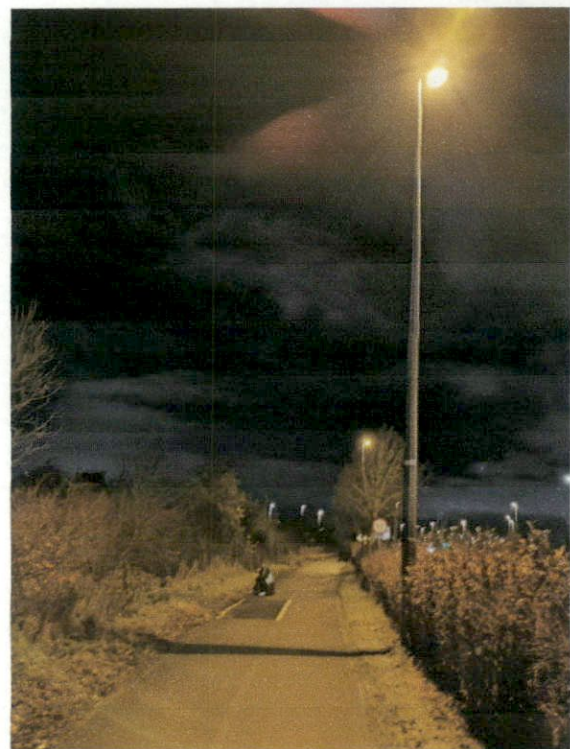
Fig. 4.2 PROPOSED PEDESTRAIN STAIRS ACCESS OFF R136:

The intent was to take advantage of the existing public lighting infrastructure for both new entrances off the R136 and thereby avoid any impact on the existing Public Lighting services here while, at the same time, avoiding any unnecessary additional costs for all concerned in the pursuit of good sustainable development.

All lighting works on site will be carried out in accordance with the SDCC's Public Lighting Specification and Standard Details where applicable.

**Fig.5: Lux level survey  
Along R136 Cycle Track & Footpath  
(~6am on 29.11.2022)**

(Viewing from ~South – North direction)



Regarding Taking-in-Charge we did note in our AI response, under the Roads Section, the following comment:

*"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. We did not envisage any requirement."*

We reiterate this; however, we are conscious that the proposed Stairs and Cycleway Accesses will be subject to contractual agreements in due course, post planning, and therefore think it is best if we can be led by the Planning Authority on what would be the best in this regard. We confirm that we will adhere to any requirements as may be agreed in due course.

## ITEM 2 – PUBLIC REALM: LANDSCAPING/ PARKS

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 landscape; boundary planting. There should be a net gain of trees and hedgerow
    - (v) Existing green infrastructure links should be maintained.

### RESPONSE:

In the previous section we have already highlighted the main proposed features here, and the Arborist and Architect have provided more detail on the proposed landscaping plan and specification, Green/ Blue Strategy, Green Infrastructure and continuity, enhanced riparian vegetative strip along all watercourses, as well as quantities for lengths of hedges proposed as being removed and installed.

The Architect's Landscaping Plan and Specification is shown on their Drawings and Report with details of all the proposed surface treatments including levels and SuDS features etc.

### ITEM 3 – HERITAGE OFFICER

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.

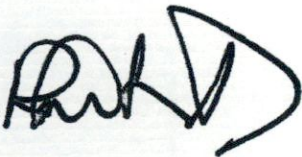
#### RESPONSE:

We refer to our previous responses and to the specifics of the Wink Lighting Report and the Opinions of the Bat Ecologist, Daniel Connell and Ecologist, Dr Ross Donnelly-Swift in particular. We have provided effectively 'dark' corridors along the watercourses maintained and indeed enhanced the green infrastructure aspects and corridors for all wildlife, not just the protected species.

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

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

Yours faithfully,



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Paul Sexton  
CHARTERED ENGINEER  
FOR SEXTON CONSULTING