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Volume 1: Written Statement

Policies and Objectives, Actions and Outcomes

The current County Development Plan 2016-2022 sets a good foundation in policies and objectives. It has actions embedded within the plan itself and among supporting documents. How these objectives and actions are progressing and what the expected outcomes needs to be stated. Furthermore, measureable outcomes are needed across the board.

Recommendations

1. Clearly state what is new to this plan and what has been carried forward from previous plan/s.
2. Updates on action progress for all plans and strategies on an annual basis
3. Direct to where progress is shown, reported and recorded.
4. Actions where possible should have timeframes and not with the generic *during the lifetime of this Plan* as inevitably they will be deferred to the end.
5. All actions should also have measureable outcomes.

Education and Awareness Programme

Education and Awareness is often entered into strategies and plans as an objective or an action. Education and Awareness should be an on-going iterative process that compliments the County Development Plan and all underpinning plans and strategies too. An Education and Awareness programme should be cross cutting. The purpose of running and rerunning educational and awareness programmes are too increase public knowledge and bring about behavioural changes. Multiple runs are needed. It often takes more than one hearing for the penny to drop. But the success of such programmes might result in:

- Reduction in littering
- Reduction in water pollution
- Reduction in complaints
- Increased investment in place
- Increased reporting of illegal activities
- Improved compliance with policies and objectives
- Increased number of community groups interested in particular aspects
- Increased interest in the County Development Plan, strategies etc.
- Reduction in planning objections
- Increased pride in the areas we live in
- Improved awareness of our impacts on the environment

Recommendations

- The engagement of a County Development Plan Officer
- Development of a Cross cutting Education and Awareness Programme or bring existing ones together suitable for online and /or on the ground delivery.
- Community Ambassadors
- Better use of the PPN and other voluntary organisations but only as a compliment to not instead of investing in resourcing
- Need on-going education, awareness, communication, outreach programme to increase public engagement with the process of arriving at a County Development Plan
- Community based Advocacy Officers for the all Plans and Strategies
- More Human Resources to implement plans:
 - County Development Plan Officer

- Biodiversity Officer
- Planning Inspectors
- Tree Officer

Chapter 3: Natural, Cultural and Built Heritage

To amend the following as indicated in blue text:

HCL9 Objective 2:

To ensure that development above the 350 metre contour in the Dublin Mountains will **seek to protect** the open natural character of mountain heath, gorselands and mountain bogs.

Zoning Objective 'HA - DM': 'To protect and enhance the outstanding natural character of the Dublin Mountains Area'¹

NCBH10 Objective 2:

To ensure that the Council promptly and appropriately treats invasive species such as Japanese Knotweed, **located on public lands, where notified by members or where it comes to the attention of the Council.**

Protected Habitats outside of Special Areas of Conservation

The County has only 3 Natura 2000 Sites and 5 proposed Natural Heritage Areas. There are three identified and confirmed protected habitats in Rathcoole, within the area outlined for Core Strategy 10 Rathcoole Specified Local Objective 1. The Council needs to be more proactive in protecting identified annex habitats by seeking designations that afford protection including:

- Special Area of Conservation
- Nature Reserve
- Natural Heritage Area

The application processes for any of the above are relatively simple, and the Council can do so.

This is in line with and supports the climate change positive objectives of:

NCBH2 Objective 3:

To protect and conserve the natural heritage of the County, and to conserve and manage EU and nationally designated sites and non-designated locally important areas which act as 'stepping stones' for the purposes of green infrastructure and Article 10 of the Habitats Directive.

GI1 Objective 3:

*To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites **and protected habitats outside of Natura 2000 sites.***

It also supports:

Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas

¹ Note: The Division between the 'HA-DM' and 'HA-DV' zones occurs at Fort Bridge, Bohernabreena.

Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.

Tree Preservation Orders

With reference NCBH11 Objective 2:

To regularly evaluate and identify trees of amenity value within the County with a view to making them the subject of Tree Preservation Orders or otherwise protecting them and further, to furnish information to the public in this regard.

The Council need to actively show how and when this activity is being undertaken and the outcome.

I suggest that the Council to make Rathcoole Woodlands and the Beech Trees on Fitzmaurice Road in Rathcoole the subjects of Tree Preservation Orders.

Burgage fields

Burgage is a medieval land term used in Great Britain and Ireland, well established by the 13th century. A burgage was a town rental property, owned by a king or lord. The property usually, and distinctly, consisted of a house on a long and narrow plot of land, with a narrow street frontage. (Wikipedia)

To date no burgage plots have been identified in Rathcoole. But there are field boundaries that are distinctively burgage like in character on Stoney Lane. It is important to establish the veracity of these fields and ensure their preservation.

Newcastle has:

To the casual observer, these elongated fields would appear to be nothing special. Burgage Plots In fact they are the remains of Newcastle's Burgage plots. Burgage plots were a type of Medieval allotment; long and narrow plots of land were situated at the back of, and the same width as, street-facing properties and were used to grow foodstuffs. These are particularly well-preserved examples².

Unfortunately, some of these burgage hedgerows have been lost:

It was considered that the development of the eastern portion of the landholding as the first phase would result in the development of lands previous disturbed as part of ground works associated with Reg. Ref. SD05A/0344 (ABP Ref. PL06S.217096). In this regard, the commencement of development on the eastern portion of the lands would not result in the loss of agricultural lands and would provide an opportunity to reinstate and enhance some of the burgage plots and hedgerows lost due to previous works on site.³

*ABP's own inspector had recommended permission for the development be refused on the grounds of its adverse impact on biodiversity due to the removal of two large sections of 700-year-old hedgerows as well as its negative impact on landscape and views.⁴ **It is important that the Brugage hedgerows of Newcastle and Rathcoole are protected by specific objectives and actions with measureable outcomes in the Plan to ensure their preservation and enhancement.***

² <https://www.echo.ie/show/article/400-new-homes-approved-by-abp-for-newcastle-site>

³ <http://www.pleanala.ie/publicaccess/EIAR-NIS/305343/Newcastle%20SHD/EIAR/EIAR/Ch%204%20Consideration%20of%20Alternatives.pdf>

⁴ http://source.southdublinlibraries.ie/bitstream/10599/10599/3/Newcastle%20Walking%20Tour_3.pdf

Glebe House Rathcoole

Glebe House in Rathcoole is in one sorry state despite it being on the register of protected structures and in an Architectural Conservation Area. One has only to check out the photograph from 2002 at: <https://www.buildingsofireland.ie/buildings-search/building/11213013/glebe-house-main-street-rathcoole-rathcoole-dublin> and compare it to today, roofless, windowless, and boarded up albeit it there was a fire in 2008. Nothing has been done to protect it from further deterioration or restore it. The “protective” plastic roof is all but gone now.

The Council must look to have Glebe House preserved from further damage and restored in line with their policies:

NCBH19 Objective 1:

To ensure the protection of all structures (or parts of structures) and their immediate surroundings including the curtilage and attendant grounds of structures identified in the Record of Protected Structures.

Chapter 4: Green Infrastructure

There are many welcomed advances in the Green Infrastructure (GI) Chapter with descriptions of Strategic Corridor, Local Corridors, Case Studies, measures etc. There are great descriptions on biodiversity, ecosystems services and all their benefits. The GI Chapter/Strategy has many excellent policies and objectives.

I doubt that many realise that this chapter along with Appendix 4 constitute the Green Infrastructure Strategy even though it is stated the opening line of the chapter:

This chapter of the Development Plan, alongside the associated maps, sets out the Green Infrastructure Strategy for the County.

The GI Strategy really was deserving of a separate public consultation given the climate and biodiversity crisis and its close links and importance to the Biodiversity Action Plan. A separate public consultation could have brought this chapter/strategy even further and built upon the good foundation and direction outlined.

The Council have done a great job on their engagement with the National Pollinator Plan with the establishment of wildflower meadows throughout the parks in the County. The Council also has a strong focus on STREET trees. The focus now needs to be broadened to encompass all biodiversity beyond pollinators; bees and butterflies.

Thought has to be given to what provision is being made for other wildlife through our GI network. Where are the homes for nature? I am thinking of the myriad of creatures that inhabit our wild spaces, the walkers, fliers, crawlers and swimmers, the daylight lovers and nocturnal wanderers. How can nature move from the core areas along the corridors and within the stepping stones? Are the linkages truly there and if not how can they be created for example wildlife bridges, more wetlands.

The County's parks, open spaces, rivers, waterbodies, habitats, natura sites, landscape character types (see Chapter 3 Natural, Cultural and Built Heritage) and other green and blue assets were mapped in detail. The blueprint of the existing GI network in the County has emerged from this process (See Figure 4.3).

Blueprints are normally more detailed than is presented in Figure 4.3. The Council needs to have good public available maps of the GI network if only to guide developers but it certainly would be very educational for people. Figure 4.3 needs to be amended to show the Enterprise and Employment areas already built i.e. Greenogue and the new buildings along the M7.

Green Infrastructure Strategy and the Draft Biodiversity Action Plan

The Green Infrastructure is referenced in the Draft Biodiversity Action Plan for South Dublin in Chapter 2 ending with:

This network forms the foundation of the County's 'Green Infrastructure', where our rivers, streams and green spaces interlink with one another to form a network of corridors through the County where wildlife and humans can travel.

In Chapter 3 it goes on to say:

Protection for nature and biodiversity in general is enshrined in the South Dublin County Council Development Plan 2016-2022, where a variety of strategies are in place ***to safeguard*** and promote our natural resource. One of these strategies is to develop a healthy '***Green Infrastructure Network***' across the County, benefiting both wildlife and people.

And in Chapter 5:

The Biodiversity Action Plan will support the development, delivery, and implementation of a Green Infrastructure Strategy for South Dublin County, planning ahead to ensure a linked-up network of parks, green spaces, hedgerows, protected sites, parks and waterways to allow wildlife to move throughout the County.

In Chapter 6:

Surveying and mapping the areas in the County that form the building blocks of our Green Infrastructure network for species and habitats is a vital first step for the Biodiversity Action Plan.

The GI strategy is one of the Key Indicators for the Biodiversity Action Plan under Action 1 ***GETTING TO KNOW WHAT WE HAVE - Spatial Projects***

The Biodiversity Plan is concerned with protecting and preserving and that function needs to be stronger in the Green Infrastructure Strategy if it is to support the Biodiversity Plan.

Tree Planting

The value of trees in delivering carbon sequestration is undisputed. Tree canopy cover in the County has been assessed based on data provided by UCD, see Figure 4.1 It is highly desirable that the extent of this canopy should be extended during the lifetime of the Development Plan. Where considered appropriate objectives supporting additional planting are included in the relevant neighbourhood areas (refer to Chapter 12, Our Neighbourhoods).

The Councils Tree Management Policy states that the number of STREET trees in the County is not known. A reference to the Councils Tree Management Policy is needed. There is newer improved data in other organisations and newer technologies available for estimating tree cover.

Components of the GI Network

Core Areas serve as anchors within a GI network. They are the point of origin and destination for wildlife and are sites at which essential ecological processes occur.

Corridors represent the physical links that tie the network of Core Areas together. They typically align with water courses or linear open spaces and allow for the migration of species between Core habitats.

Stepping Stones are smaller areas of green space. They provide alternative routes for the movement of species within the over all network and contribute to local biodiversity.

There are **Strategic County GI Corridors** (Chapter) supported by a number of **Local GI Corridors** (Appendix 4).

Strategic Corridor

Strategic Corridor 5: Camac River Corridor

The three protected habitats in Rathcoole and Rathcoole Woodlands deserve a mention in the **Strategic Corridor 5: Camac River Corridor** and are a must for inclusion when listing Core Areas and Stepping Stones.

Figure 4.3 illustrates the connection along the Camac River/Riparian Corridor from the pNHA at the Brittas Ponds through to Slade of Saggart and Crooksling Glen pNHA, down to Saggart and the Mill Ponds and along the side of Rathcoole Park. Along the way, tributaries join the Camac including the Crookshane and Coolmine Streams linking the equally important and biodiversity rich Rathcoole Woodlands and the aforementioned protected habitats but also connecting hedgerows, and agricultural fields.

The Upper reaches/Catchment of the Camac deserves particular protection given that once culverted under the M7, historical and present day human interference increases considerably compared to the upper reach.

The issues to be avoided and issues to be addressed are identified but how and when also needs to be specified.

Given that that the Plan states:

Core Areas serve as anchors within a GI network. They are the point of origin and destination for wildlife and are sites at which essential ecological processes occur.

More information should be given on the selection of Core Areas and how they are point of origin and destination for wildlife, what that wildlife is and also describe the essential ecological processes and what they provide. How does that apply to the only identified core area Corkagh Park? Slievethoul, Slade Valley, Lugg Forest and Rathcoole Park are far more obvious Core Areas and should be identified as such e.g. deer have travelled from the hills through Rathcoole Woodlands to the meadow that is the Department of Education lands beside Rathcoole Park. Badgers live in and around the rewilded lands i.e. the aforementioned Dept. Education lands, the GAA lands and Rathcoole Woodlands and the agricultural land surrounding those lands.

The points above apply to many of the other Strategic Corridors.

Local GI Corridors

L7 – Citywest-Saggart Link

Rathcoole Park – Citywest Golf Club – Green space at Cooldown Commons – Coldwater Commons – Green space for development adjacent Fortunestown Luas Stop – Citywest Village Green – Citywest Ave green space – Roadstone Quarry

This needs a better map to with a better indication of what Linear Corridor 7 is made up of i.e. the parks, gardens, open spaces, wild space, river corridors etc., what are their functions, what wildlife/aspects of nature they are supporting. The maps need to be better than a broad brushing green colour over a non-descript map. What about the blue spaces, etc.?

One of the objectives is:

To implement new roadside planting along Mill Road in order to provide a linear link between Rathcoole Park and Citywest Golf club.

I would question where the planting could take place that would connect Rathcoole Park and Citywest Golf club i.e. is there space and is there a line of connectivity?

Case Studies

The Case Studies are good but I wonder what criteria were used to define the typologies? And if those criteria have been applied across South Dublin to identify the location and number of areas within each typology? For example, the orange outline of Clondalkin Village, which is presumably defining the Established Urban Typology, is skewed to the west to take in vast tracks of undeveloped land. The outlined area is largely not urban and not particularly representative of the typology description. What is the land use map for the green areas? What do people perceive Clondalkin to be and within that what part is Clondalkin Village? Also the components of GI need to be indicated on the satellite imagery used in the case studies. It would clarify where and what the GI network is.

County wide application of the key lessons from each Case Study is good principal, but how will it turn out in practice? Are the policies outlined for each case study in effect the key lessons which could be brought forward? Currently the key lessons are much pared back compared to the GI policies.

Chapter 8: Community Infrastructure and Open Space

Rathcoole People's Park

Rathcoole People's Park is located at the eastern end of Rathcoole Village. It is described on SDDC website as: *The Park is noted for its interesting topography and water features which are enhanced by the surrounding rolling landscape.* Rathcoole Park has a playground and 3 playing pitches. It is one of the smallest neighbourhood parks at 14.2 ha. Its area is more in keeping with that of a local park which range in size from 2 to 20 ha.⁵ Neighbourhood parks are between 20 and 50 ha in size.

It is the local park designate for Saggart/Citywest along with Carrigmore Park, and for Rathcoole and Newcastle, according to SDCC County Development Plan 2016-2022. There is a provision for a park under the Local Area Plan for Newcastle which has yet to be delivered.

It is expected to serves the populations of Saggart ; the fastest growing town in the 2016 Census with 3,133 people; Rathcoole which experienced the next largest percentage increase in population to 4,351 people; and Newcastle with 4,257 people. Rathcoole Peoples Park is a valuable, treasured and well used amenity by the people of Rathcoole, Saggart and Newcastle. **It is important that Rathcoole Park is protected by specific objectives, actions with measureable outcomes in the Plan that ensures its function as a Park and its ecological benefits. This means ensuring there is a balance between green open space as green open space with recreational space e.g. football pitches and that blue space is blue space i.e. independent, and sufficient grey space i.e. car parks.**

Chapter 12: Our Neighbourhoods

The Neighbourhood concept is a good idea. However, some neighbourhoods are not aligned from a national planning perspective despite their geographical proximity. For instance, Citywest/Saggart/Rathcoole/Newcastle should have been two neighbourhoods - Citywest/Saggart and Rathcoole/Newcastle. Rathcoole and Newcastle are not identified as major growth nodes but Citywest and Saggart are, and this is one distinguishing difference among others.

Also the statistics and categories presented varied between neighbourhoods which made comparisons difficult. The populations could have been broken down more to give a better picture of the demographic.

Sad to note there are no VILLAGES in South Dublin, See Table 1.1 in the current Plan:

⁵ https://www.southdublindevplan.ie/sites/default/files/documents/CDP%202016-2022%20%28lower%20res%29_0.pdf

Village: In the Hinterland area and rural part of the Metropolitan area. Villages with a population of up to 1,000 persons. To be defined by Development Plans. None identified in South Dublin County.

Recommendations

1. Automatic Local Area Plan for Rathcoole and any other area that will undergo significant development either residential or commercial with a definition of what significant development means e.g. 10% predicted growth on existing population. The current process is hit and miss – refer to Master Plan for Rathcoole and no Area Plan.
2. Aim to preserve the remaining small towns of Newcastle and Rathcoole as small towns. No further or limited development should take place in both.
3. Define any remaining villages as villages such as Brittas, and any other settlements that meet the criteria of village.
4. Instead of building huge estates e.g. Adamstown and Clonburris, opt for multiple interlinked villages thus maintaining the rural aspect and to some extent nature and biodiversity.
5. The establishment of New Villages with proper community and infrastructural facilities are better able to constrain the spread of COVID any such other pandemic that may follow.
6. New Villages can be at higher housing densities as long as they are well designed and fit with their surrounding landscape.

Chapter 13: Implementation and Monitoring

The opening **vision** statement of the Implementation and Monitoring Chapter is:

*That development is implemented in accordance with the policies and objectives of the County Development Plan and verified through a **robust monitoring mechanism**.*

But then the chapter:

“sets out development standards and criteria that arise out of the policies and objectives of the County Development Plan....” And consists of a substantial portion devoted to Land Use Zoning, and basically provides a summary of the policies and objectives from the preceding chapters and any associated appendices and other reports accompanying the Draft County Development Plan. It is an overarching chapter for developers and presumably the intention is by outlining the policies and objectives etc. to be considered in planning development applications, those policies and objectives are therefore implemented.

The policies and objectives outlined in the chapters need specific targets or outcomes e.g. how many historical protected buildings have a measure of the standard of repair? how much hedgerow will be left intact? Of most concern is the Green Infrastructure (Strategy) because it is inextricable linked to the Climate Action Plan, the Tree Management Policy, unpublished Biodiversity Action plan but also its importance in the context of the climate and biodiversity crisis. **An implementation plan for the Green Infrastructure Network is needed.**

On page 606, the Draft Plan states that the monitoring framework is:

is anchored to the overall Vision for the Development Plan and individual chapters (Refer to Chapter 1 section 1.4) which are broadly aligned with the United Nations Sustainable Development Goals, the National Strategic Outcomes of the NPF and the Regional Strategic Outcomes of the RSES.

This is the first mention of the **United Nations Sustainable Development Goals**. There are plenty of mentions of National Strategic Outcomes of the NPF and the Regional Strategic Outcomes of the RSES. Policies and objectives need to be directly linked to the United Nations Sustainable Development Goals.

The Chapter goes on to say why the monitoring plan cannot always be:

“S.M.A.R.T.E.R. (Specific, Measurable, Assignable, Realistic, Time-Bound, Evaluated and Reviewed)”

Environmental Monitoring is given a short paragraph and could be more ambitious in terms of integration:

“the full and comprehensive monitoring and evaluation assessment, required to be undertaken under Article 10 of the SEA Directive, is set out in the Strategic Environmental Assessment that accompanies the County Development Plan. Consideration will be given to integrating these monitoring processes over the life of the Plan while ensuring that the environmental objectives are clearly identifiable.”

The Monitoring Framework is based on a loop that proposes to Monitor Key Indicators and Monitor Implementation of Policy. A link is needed between this loop and the attempt to have a *“S.M.A.R.T.E.R. (Specific, Measurable, Assignable, Realistic, Time-Bound, Evaluated and Reviewed)”* The same language should be used from S.M.A.R.T.E.R. to Loop to Monitoring Plan.

In setting out the Monitoring Framework, *S.M.A.R.T.E.R* should be referenced where possible. There is heavy reliance on the implementation of other Strategies and Plans for implementation or simply listing Departments responsible for overseeing or implementing. Some of the mentioned strategies and plans need to have actions that achieve an outcome. In some instances, the production of a plan or a review of a plan is the Monitoring/Key Performance/Data Source. Outcomes or measurable actions should be stated where it is possible to do so.

For example,

GREEN INFRASTRUCTURE (GI) Policy 1 Overarching

Protect, enhance and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change.

Implementation

Comply with GI Strategy prepared in conjunction with this Plan – What is the measurement?

Planning Department and Environment Directorate

Supported by National Climate Action Plan 2019, National Biodiversity Action Plan 2021 – 2025 and the South Dublin County Council Biodiversity Action Plan, 2020 – 2026, the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).

Do these supports achieve the desirable Policy 1 outcomes (what are they?) and how is it measured?

Monitoring (Key Performance/Data Source)

Implementation of objectives set out in Chapter 4 Green Infrastructure and the measures set out Chapter 13 Implementation and Monitoring of this Plan.

Source: Planning Data (APAS).

Many GI objectives and indeed objectives in other chapters are linked to new development only whereas they should have a county wide remit. The measures for each chapter should be clearly set out in Chapter 13. It needs to be clearer how other Plans support the implementation of policies and objective. Are there actions or measures in place to achieve the objective?

The overarching section for developers outlining the policies and objectives etc. should be separate from the monitoring section. The monitoring plan needs to be more ambitious, clearer on actions, measures and outcomes.

Other Observations

Floodplains and Development

Of concern is the continued granting of permission for development on floodplains i.e. the logistic business park on the N7 and Greenogue industrial park, particularly considering the CAMAC is to undergo its third flood relief scheme.

Flooding in Rathcoole Park

The alteration of the hydrology in Rathcoole Park probably due to the Irish Water pipe work, recontouring and landscaping of the GAA lands that removed a reed and sedge swamp, and new pitches, has resulted in increased flooding of the paths and parts of the park. The current measures put in to alleviate the flooding are an open drainage ditch directly discharging to the Coolmine Stream, and many open and stone filled smaller drains with most also directly discharging to water courses. In addition the new pitches have subterranean drains also leading to the Camac. This is providing additional flow to the rivers. Better solutions are needed that are nature based such as wetlands, ponds, and swales and that are conducive to protecting the annex habitats and non-annex habitats and supportive of ecosystems.

Maps

There are a number of hexagons on 09 sheet_Map 08 around the area marked out for CS10 SLO 1, I hope that the positioning of some are not indicative of where their objective is intended e.g. SM6 Traffic and Transport Management SLO1 located in Rathcoole Park which is odd
GI7 Policy GI7: Landscape, Natural, Cultural and Built Heritage SLO 1: in the GAA lands which is fine
EDE22 Heritage, Culture and Events Tourism SLO1 at the Mill Ponds which is fine
COS8 Primary and Post Primary Schools SLO1 Located on Fitzmaurice Road which is also odd
If they are the specific locations then they might need to be looked at again.