



Planning Ref: FP-2025-078
(Please quote in all related correspondence)

29 September 2025

County Hall,
Belgard Square North,
Tallaght,
Dublin 24,
D24 YNN5

Re: Notification under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

Proposed Development: proposed Variation to the Clondalkin Draft Local Planning Framework

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I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The Department notes the relatively extensive green infrastructure network already existing in the area which is the subject of the Draft Clondalkin LPF and welcomes the range of policies and objectives set out in LPF Chapter 4: Green Infrastructure to protect this network and, where feasible, bridge gaps in the network and otherwise enhance it. By providing for the protection and improvement of the green infrastructure network the LPF should contribute very significantly to the conservation into the future of flora, fauna and ecologically important habitats in the Clondalkin area. The green infrastructure network within the Clondalkin LPF area consists of a number of parks, playing fields and other open spaces, but the area within this network of most nature conservation significance is the Camac River corridor which traverses the LPF area from south west to north east. Lying just outside the northern boundary of the LPF area, the Grand Canal proposed Natural Heritage Area (pNHA) is in addition of very high value to the wider Clondalkin area from a nature conservation viewpoint. The SEA Environmental Report recognizes various key ecologically sensitive features associated with the Grand Canal pNHA, namely otter, white-clawed crayfish, and five bat



species (common pipistrelle, soprano pipistrelle, Leisler's bat, Daubenton's bat and long-eared bat), and all these species are known or thought very likely also to occur in the Camac River corridor. Further, the protected plant species opposite-leaved pondweed *Groenlandia densa* has previously been recorded in both the Camac and the Grand Canal in the Clondalkin area, and the river hosts a population of brown trout *Salmo trutta*.

Surveys carried out in the 2000s in connection with now discontinued proposals to construct a west Dublin orbital LUAS route from Tallaght to Blanchardstown identified several otter spraiting sites on the Camac in the LPF area upstream of Clondalkin village, and survey work by Triturus Environmental Ltd downstream of the M50 within the Dublin City Council area for that Council indicated otter usage of the entire stretch of the Camac within the M50 down to its confluence with the Liffey at Heuston Railway Station. This usage occurs despite the culverting of the Camac under the Mill Shopping Centre in Clondalkin, as well as in the Fox and Geese and Bluebell areas and under Heuston Station itself in the City Council area. Before the construction of the New Nangor Road otter movements were known to occur freely between the Camac and the Grand Canal where they run adjacent to each other just west of the M50, and it is likely that movements of otter still occur between these two water bodies by an overflow storm water culvert which connects them under the New Nangor Road, where the road now separates river and canal. The otter is subject to a system of strict protection under the Habitats Directive (92/43/EEC) because of its rarity in Europe as whole, and its widespread occurrence along a city's water courses as in Dublin is therefore of some note. For the conservation of the otter population present in the Clondalkin and wider west Dublin city areas it is important that both route ways for the species along the Camac and between this river and the Grand Canal are preserved and suitable foraging and lying-up habitat along these water courses.

In general, to ensure the continued presence of aquatic flora and fauna in the LPF area it is essential to retain as extensive an undeveloped corridor along the Camac as possible. The proposed policy objectives in the LPF, set out in GI 4 Objectives 1,2,4,5 and 7, GI 5 1-3 and GI 6 2 to protect and improve the riparian corridor along the Camac by additional planting, siting of footpaths/cycleways back from the river, controlling development in the river's riparian zone and future de-culverting are therefore strongly endorsed by this Department. The Department's only reservations regarding the policies presented in the LPF in relation to the Camac corridor are with regards to GI 4 Objective 3 *To support the completion of the Cycle South Dublin active travel route linking Corkagh Park with Clondalkin Village and onwards to the Grand Canal Greenway having regard to the need to maintain the integrity of the Camac riparian corridor, exploring any synergies with the Camac FAS*. It is concerned any routing of a cycleway along the left bank of the Camac downstream of Clondalkin village, as appears to be proposed under this objective, could be detrimental to the biodiversity of



this area, especially if the cycleway was to be illuminated, leading to increased light pollution and likely adverse effects on otter and light sensitive bat species such as Daubenton's bat and long-eared bat.

Given it is intended in the near future to implement the Camac Flood Alleviation Scheme (FAS), referred to in GI 6 Objectives 1 and 2, and the high biodiversity value of the Camac corridor, it would be desirable that surveys of the flora and fauna of this corridor are carried out as soon as possible so as to inform what measures can be undertaken to enhance the corridor's biodiversity value in parallel with the implementation of the flood alleviation scheme. For instance, based on the identified sites of high usage of the riparian corridor by otter and bat species, locations could be selected along the Camac where artificial otter holts and appropriate designs of bat boxes might be usefully installed as part of this scheme.

Surveys of the Clondalkin LPF area as a whole should in addition be undertaken to identify the exact locations of bat roosting and swift nesting sites known to be present in Clondalkin, so as to conserve these species within the LPF area into the future, by allowing the locations of identified bat roosts and swift nesting sites to be taken into account when evaluating development proposals that might affect such sites, and drawing up mitigation measures to minimize these developments' effects on bats and swifts.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at referrals@npws.gov.ie, where used, or to the following address:

The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford Y35 AP90

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David O'Connor
Development Applications Unit
Administration

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