

Senior Executive Officer,  
Housing Department,  
South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24.

29<sup>th</sup> October 2025

Our Ref. 25101

**Re: Planning & Development Act 2000 and the Statutory Regulations made thereunder (as amended). Submission by various residents in relation to a Part 8 development for a Synthetic Grass Sports Pitch, fencing and floodlighting and other ancillary elements at Greenhills Park, Dublin 12.**

**Planning notice date: 17<sup>th</sup> September 2025**

**Planning Ref. PT8SD292**

**Timeframe for making a submission on or before 5pm on 30<sup>th</sup> October 2025**

**Submission to South Dublin County Council Part 8 Development**

Dear Sir / Madam

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin, D18 T3Y4, are instructed by a number of local residents, as listed at the rear of this submission, to make the following submission to South Dublin County Council in respect of the Part 8 application for the above described development.

As requested in the Part 8 public notice this submission is made via one medium only within the timeframe specified. We note that there is no fee for observations/submissions in relation to a Part 8. Our submission on behalf of our clients and the full reasons and considerations upon which this is based are set out below. We can confirm that we are familiar with the subject site and have examined the Part 8 drawings and other particulars that form part of this planning application by South Dublin County Council.

We respectfully submit that the grounds for not permitting and rejecting the proposed Part 8 development are clear and unambiguous. We respectfully request that South Dublin County Council fully consider the content of this submission and decide not to proceed with the Part 8 development at this location in the interests of the proper planning and sustainable development of the area.

The proposal is contrary to the proper planning and sustainable development of the area and should be not permitted on the following grounds:

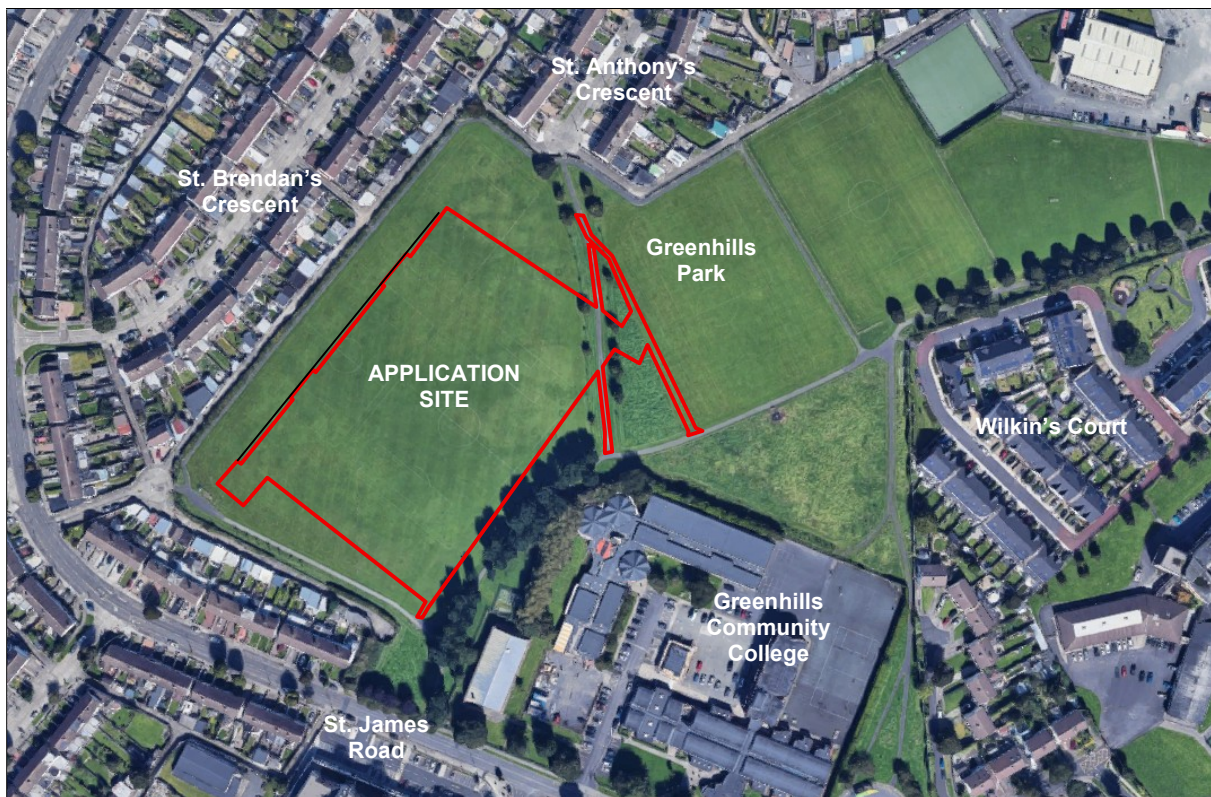
- Contrary to South Dublin County Council Sports Pitch Strategy (2020) that do not identify Greenhills Park as a suitable location for an all-weather sports pitch;
- Contrary to Policy COS4, Objective 1 and COS5, Objective 3 of the County Development Plan;
- Negative impact as a result of light pollution and noise on the residential and visual amenity of local homes that will be compounded by the height of the floodlighting and height and length of the proposed ball nets;
- Negative impact as a result of light pollution of the use of the hedgerow and tree lines by bats, which will be further compounded by the length and height of the proposed nets;
- Loss of pitches available, and loss of the park as an amenity to the wider neighbourhood would significantly denude from the quality of life for residents, and create poor quality spaces around the periphery of the all weather pitch that will become underused; and
- The use of the pitches for longer periods will create overflow and haphazard car parking in the surrounding residential areas, particularly to the north-west and north-east of the park.

Prior to outlining the detailed grounds for our client's submission for the refusal of the proposal it is useful that the correct context of this Part 8 application is laid out:

### 1. Subject site and environs

The site that is the subject of this Part 8 application is located within the south-western part of Greenhills Park that is zoned as open space and is actively utilised by the local community. The overall park measures c. 6.5hectares and contains a playground at its north-eastern corner, and the grassed area is laid out to form three full sized football pitches, and two junior pitches.

The park contains a number of hard surfaced footpaths that extend around its perimeter and connects to the wider public realm at the corner of houses at St. Brendan's Crescent / St. James's Road to the south-west; at an entrance onto St. James's Road to the south; to a bus turnaround adjacent and to the east of Greenhills College to the south-east; to Limekiln Lane to the east; and to St. Anthony's Crescent to the north. The park contains four paths that cross it from north to south. The western of these north-south paths forms part of the proposed development site and is an avenue type pathway. The eastern and western ends of the southern pathway is also avenue like, with trees either side.



*Aerial view of the application site (Source Google Earth) with houses of our clients bounding the site on St. James Road and St. Brendan's Crescent*

The Proposed Development site is bound by:

- a c. 20m width of the existing park and a service road to the rear of houses along St. Brigid's Crescent to the north-west;
- a variously wide width of the existing park and a service road to the rear of houses on St. James's Road to the south-west;
- by the Greenhills Community College campus to the south-east; and
- by other parts of the Greenhills Park and St. Anthony's Crescent to the north and north-east.

The park in the vicinity of the proposed development site is fairly flat and is generally bounded by a low metal palisade fence with a hedgerow that is planted on the inside of the fence within the park. This hedgerow is not continuous with a stone wall forming the boundary at the entrance into the park from St. Anthony's Crescent. The park forms an important local resource to serve the residential community of the area and is

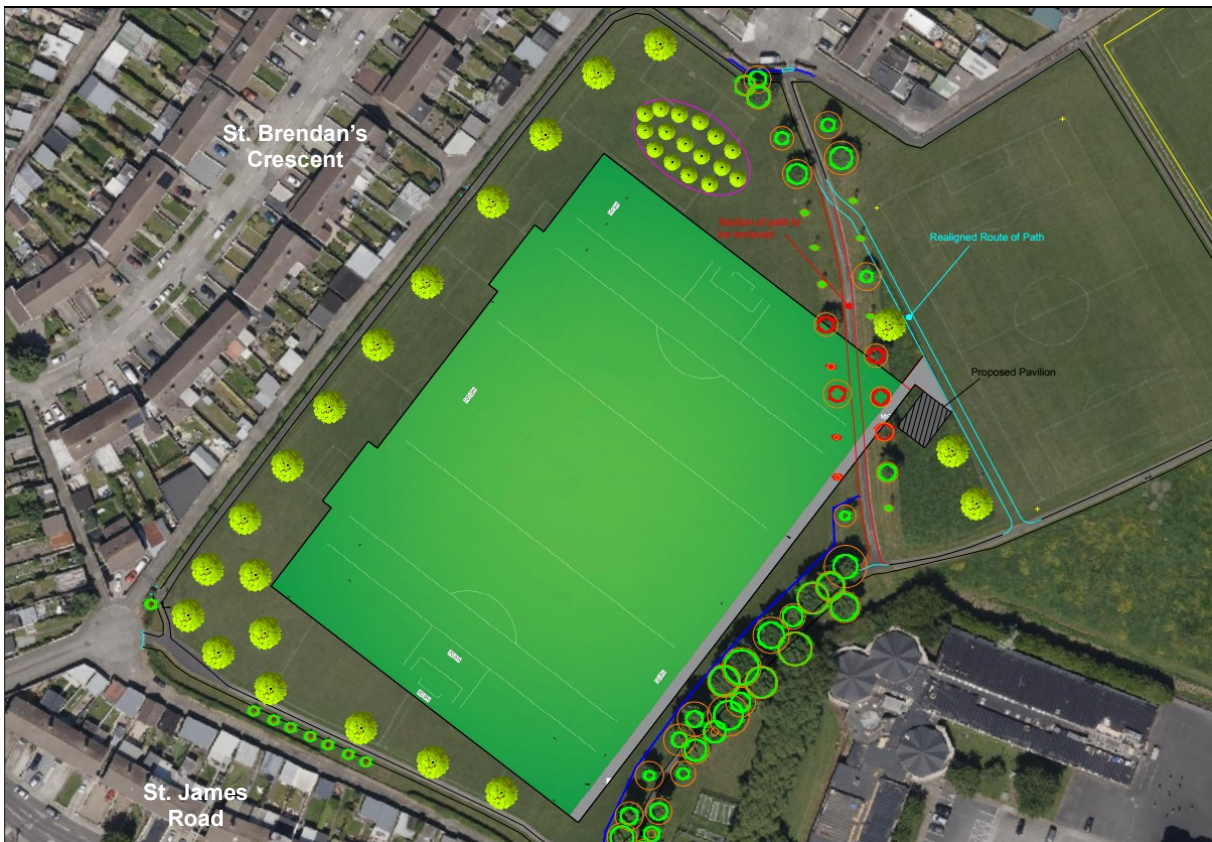
very well used for organised and informal play. The subject site is zoned as OS (Open Space) within South Dublin Development Plan 2022-2028 with an objective to “To preserve and provide for open space and recreational amenities”.



View of park from its north-east corner showing significant tree stand along its south-eastern boundary in distance, flat nature of the proposed development site and boundary of the park

## 2. Proposed Part 8 application by South Dublin County Council

The proposed development provides for the construction of a synthetic grass 3G all-weather sports pitch that will be aligned in a south-west to north-east alignment. The new all-weather pitch will replace one full sized pitch and two smaller pitches that are used for junior matches in this part of the pitch. The new pitch is designed to facilitate a range of sports (2 football pitches or one rugby / GAA pitch), but is sized and designed, it would appear, in terms of its maximum size, and the behind goal netting, to be used as a GAA pitch. The lighting report that accompanies the Part 8 application, also refers to it as ‘Greenhills Park GAA’. There is therefore a need for the members to question the true function and use of the pitch.



Extract from Drawing no. 3229-01

The new all-weather pitch is proposed to be encircled by perimeter fencing that will be 4.5m in height with a 13m tall ball stop netting to the rear of both goal areas. The 13m tall netting will be 96m in length behind each goal end of the pitch.

This Part 8 application also includes for the provision of 6 no. floodlighting columns that are positioned with three columns either side of the pitch and all will be 21.3m high. The application also includes for the construction of a single storey pavilion building consisting of two individual team changing rooms, club storage area and ancillary facilities. This new pavilion is indicated as being located to the immediate north-east of the pitch and would have a footprint of 108.56sqm, and would be finished in metal cladding on its exterior.

The size of the new all-weather pitch that is the subject of this Part 8 application will require that a 112m length of the western footpath through the park will need to be realigned to the east. The application will also include CCTV, storage areas, and all associated ancillary works including, but not limited to foul and surface water drainage and utility supplies.

The Part 8 application also refers to all related hard and soft landscape works including connecting footpaths and associated planting. There is a lack of clarity in relation to the proposed landscaping being proposed. A Landscape Plan, prepared by South Dublin County Council (Drawing no. 3229-01) indicates trees to be removed, and new tree planting (see below). The rationale for the landscape plan is unclear based on best landscape architectural practice.

The Design and Access statement submitted with the part 8 application indicates that the pitch opening times will be to 22.00 Monday to Friday, and to 21.00 on Saturday and Sunday. No car parking is proposed to be associated with the proposed development. An attenuation system is located to the south-west of the proposed new pitch.

### **3. Grounds for submission**

The full grounds of our clients' submission together with the arguments, reasons and considerations upon which it is based is set out below. The proposed development site adjoins existing and mature residential areas that utilise this open space for amenity and organised sporting activities.

Its significant reduction and change in its nature will have a profound and negative impact on the overall residential amenity of the area, and would be contrary to the proper planning and sustainable development of the area and should not be progressed by South Dublin County Council.

#### ***Lighting pollution***

Our clients correctly have concerns in terms of light pollution from the six lighting poles that are aimed at facilitating daily use of the pitches to late at night. A light assessment was submitted by Musco as part of the application. Our clients are correctly concerned that the dark environment of the park will be materially eroded. This will not only negatively impact on the amenity of our clients, a number of whom live adjoining the park where the proposed floodlights are proposed, but also the use of the park by bats for foraging especially. It is notable that no bat survey was undertaken as part of this Part 8 application. The hedgerows and alignment of trees make ideal bat foraging areas, particularly given the low light environment. We submit that the lighting design is contrary to the following Guidelines for best practice that the Council require developers to adhere to when making normal planning applications:

- Guidance Notes for the Reduction of Obtrusive Light GN01 (Institute of Lighting Professionals, 2020);
- Bats & Lighting - Guidance Notes for Planners, Engineers, Architects and Developers (Bat Conservation Ireland, December 2010); and
- Bats and Lighting in the UK – Bats and the Built Environment Series (Bat Conservation Trust UK, January 2018).

Adhering with these guidelines ensures sensitive siting and design of the lighting elements and will include careful consideration of light placement on buildings, column heights and luminaire design. The lighting design report indicates that light overspill will negatively impact residential amenity and use of the site by bats foraging.

We submit that there is no evidence for the Council to claim that these impacts will not occur, with the lighting spill assessment indicating lux levels that would negatively impact residential amenity. The lighting model i should be seeking to show that the illumination levels fall off to 0.5 lux within 2m of the park (1 lux is accepted as being equivalent to a moon lit night). The new planting would not have any benefit from this regard due to the heights of the lighting poles and proximity to boundaries. The proposed development should be refused on grounds of light overspill.

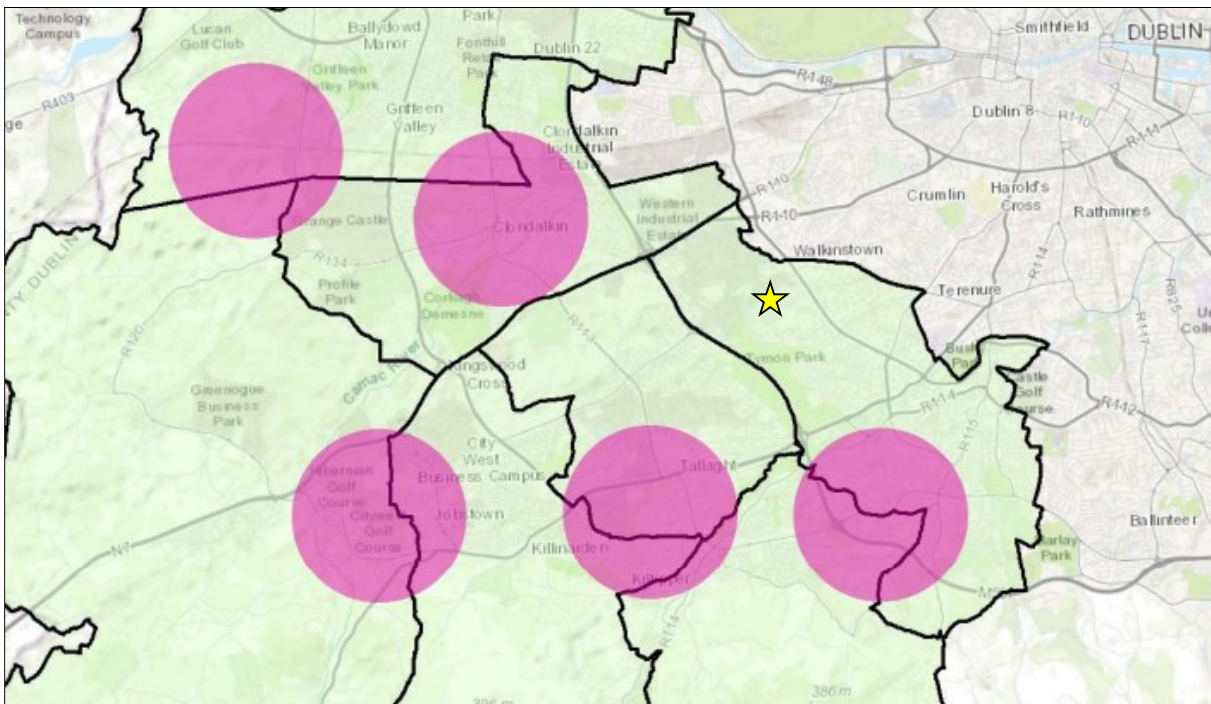
### **Negative noise impacts**

Our client's quite correctly have serious concerns in relation to the use of the all-weather facility until late at night, and the disturbance that would have on their residential amenity, particularly when considered with the additional light spill.

We submit that it is unquestionable that the 7 day use of the all-weather facility and its use late at night will have profound negative impacts on the amenity of our clients, and other local residents. It is unquestionable that noise will increase due to the all-weather availability of the pitch. For residential receptors the increase will be significant, given the closest residential receptor is only 22m away from the nearest property boundary. Whilst noise buffers will be included in the fence detail at detailed design stage to decrease the noise from rebounding balls, it is our own experience that the verocity of the shouting coupled with the balls hitting the fence is what causes the noise intrusion to a degree that would be unacceptable.

### **Contrary to South Dublin County Council Sports Pitch Strategy (2020)**

The proposed development is generally being put forward under the South Dublin County Council Sports Pitch Strategy (2020), which came out prior to the adoption of the existing County Development Plan. This was an extensive assessment of the all-weather sport pitch requirements within the County Council area. Map 4.1 of that Strategy identified Potential site zones for new all-weather pitches. It is notable that none were identified for this area (see below) with Greenhills Park marked by way of a yellow star. The area of the park, which sits within the M50, is arguably one of the best areas in terms of being served by pitches in the whole of the Dublin region, given proximity to Tymon Park. It is unclear why Tymon Park was not considered for the all-weather pitch.



*Excerpt from Map 4.1 of the South Dublin County Council Sports Pitch Strategy (2020)*

This Council strategy identifies that all-weather pitch provision needs to be aligned to areas of need. We refer the Council that this Strategy, which the officials sought to utilise to argue for the recently refused Knocklyon all-weather pitch, remains the current policy guide to all weather pitches in the County.

Furthermore, the recommendations for such facilities does not include any such recommendations for Greenhills Park.

The proposed development must be considered therefore as being contrary to Policy COS4 Objective 1 and COS5, Objective 3 of the County Development Plan and should not be granted.

The proposed development will result in the loss of an area of open space which is actively used by the local community. This will detract from this well established residential community and will deplete the area of open space available to the local community in the local and wider vicinity of the subject site. No assessment of the loss of the open space and its implication on the wider residential community has been undertaken.

The only comprehensive study of the open space within the area does not justify the removal of the open space to facilitate the proposed development. The Part 8 application does not set out details of a comprehensive study of the quality and quantum of open space which will remain should the proposed development proceed.

The current application would reduce the level of the park by approximately 50% of the area. This is unacceptable in terms of the proper planning and sustainable development of the area. This would be contrary to the Council's own objectives for the provision of public open space within the County.

In the case of the Part 8 proposal South Dublin County Council have failed to demonstrate that the quality and quantum of remaining public open space is adequate for use and the amenities of the area in accordance with the proper planning and sustainable development of the area and should not proceed.

#### ***Potential negative impact on bats***

The negative impact on bats has already been carefully set out in terms of our clients concerns in relation to light overspill over bat foraging routes.

All species of bat occurring in Ireland are listed under Annex IV of the EU Habitats Directive and as such are to be provided "Strict Protection" wherever they occur. In the absence of an assessment of this potentially important bat foraging habitat, mitigation measures ensuring strict protection are impossible to prescribe.

Our clients correctly would have serious concerns in relation to the scale of the back netting proposed. As well as appearing as being overbearing to the houses along St. James's Road, there is a high potential for the nets to impact bats, and even the implementation of more bat friendly nets, will not eradicate the issue or conflict.

Greenhills Park includes a variety of different habitats: including areas of high meadowland that include dry and wet grassland which aided in the area winning a pollinator award. It also includes sports pitches that have frequently-cut, close mown grass. The wet and dry meadows support a wide variety of plant and insect life. The close mown grass pitches mostly support low growing grasses and, as they rarely reach flowering stage, do not support a high quantity of pollinating insects or many other forms of wildlife.

The proposals include removing some existing meadows, and trees that exist within the park. Whilst some new planting is proposed, we submit that it fails to meet, and the application is devoid of any reference to the green space factor requirements of the Council under section 12.4.2 and GI5 Objective 4 of the County Development Plan. The footprint of the development far at 1.5ha. far exceeds the 500sqm under the Plan where the GSF comes into play. The proposed tree planting has a minimum impact on mitigation of the loss of habitat.

#### ***Loss of the park***

The park is extensively utilised by dog walkers, recreational users as well as sports events. The design and position of the all-weather pitch will remove the majority of the park from being usable by general members of the public. Whilst areas have been left to the north and west of the pitch, the height of the fencing will make them areas that are unwelcoming to general members of the public that currently use the park. This will denude the usability of the park, and should be grounds for refusing permission in this instance. It is unclear, and on what basis the park has been chosen, when the careful consideration of other sites more

readily identified under the Council's own Strategy have been ignored. The proposed development must therefore be considered as being contrary to Policy COS5, Objective 13 and 14 of the County Development Plan, and should not be permitted.

### **Car parking**

The area already suffers from a high degree of overflow car parking when the pitches are used for matches at the weekends, and for training and matches in the evenings during the summer months. This results in ad-hoc and unmanaged car parking. The nature of the proposed development, where there will be unrestricted use of the pitches at all times of the day up to 21.00 and 22.00, will materially compound this, which will be further compounded by the unavailability of off-street car parking for a number of local homes. The availability of off-street car parking to the north-east, adjacent to the bowling green is already over-subscribed.

### **Can the development, irrespective of the above, be controlled by meaningful conditions?**

We respectfully submit that a decision by the Planning Authority to grant permission would be deeply flawed and would need to contain entirely unenforceable conditions. We submit that the hours of operation are inappropriate given the compound impact of the increase in noise and activity into the late evening, the light pollution, and the visual impact of the floodlights. This is completely unacceptable.

### **Screening for Appropriate Assessment**

We submit that the AA Screening undertaken on behalf of South Dublin County Council is flawed on a number of grounds relating to the use of the park by wintering and migratory birds. This conclusion is not informed by any winter bird survey and appears to be solely based on distance to waterways, and marine waters, and scale of the proposed development. Reaching such conclusions when considering the qualifying interests of the nearest Natura 2000 sites is flawed. To reach such a conclusion based on a one day ecological survey is also flawed.

A request has been made under Article 120 (3), as amended by S.I. No. 296 of 2018 that allows any person, may within 4 weeks beginning on 17<sup>th</sup> September 2025 to apply to the An Coimisiún Pleanála for a Screening Determination as to whether the development would be likely to have significant effects on the environment.

### **Screening for Environmental Impact Assessment**

Our clients also have grave concerns that inadequate consideration of other projects being undertaken simultaneously, particularly by the Council, has been given in the EIAR Screening Report. In this report inadequate consideration has been made of the traffic implications of the year round proposed use of the pitch; and the greater intensity of use, and the loss of the Park as an amenity serving the wider public, as well as the amenity impact of the use of artificial lighting. The EIAR Screening simply dismisses this as not a concern, when already, even prior to the significant intensification being proposed in this instance has been undertaken and implemented.

We note that the Commission are restricted under Article 120 to what is defined as a sub-threshold development under Article 92 of the Regulations. A sub-threshold development means development of a type set out in Part 2 of Schedule 5 which does not equal or exceed, as the case may be, a quantity, area or other limit specified in that Schedule in respect of the relevant class of development;

The proposed development forms an urban development within an overall park of 6.5 hectares; and a Part 8 application site of c. 1.6ha.; and where the pitch measures c. 1.45ha.. We submit that this is an infrastructure project that can be classed as Urban development under Class 10(b)(iv) of Schedule 5 of Part 2 of the Regulations. We have requested the Commission to consider the plan for EIA Screening Determination, along with a consideration if the approach by South Dublin County Council, is deemed project Splitting.

## **4. Conclusions**

The planning application material submitted with the Part 8 planning application is significantly deficient in nature and should be not permitted. We respectfully submit that there are a number of critical matters for the Planning Authority to consider in determining, and we would request, not permitting this Part 8 application.

The proposal is contrary to the proper planning and sustainable development of the area and should be not permitted on the following grounds:

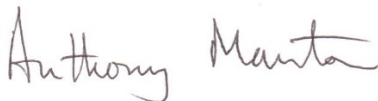
- Contrary to South Dublin County Council Sports Pitch Strategy (2020) that do not identify Greenhills Park as a suitable location for an all-weather sports pitch;
- Contrary to Policy COS4, Objective 1 and COS5, Objective 3 of the County Development Plan;
- Negative impact as a result of light pollution and noise on the residential and visual amenity of local homes that will be compounded by the height of the floodlighting and height and length of the proposed ball nets;
- Negative impact as a result of light pollution of the use of the hedgerow and tree lines by bats, which will be further compounded by the length and height of the proposed nets;
- Loss of pitches available, and loss of the park as an amenity to the wider neighbourhood would significantly denude from the quality of life for residents, and create poor quality spaces around the periphery of the all weather pitch that will become underused; and
- The use of the pitches for longer periods will create overflow and haphazard car parking in the surrounding residential areas, particularly to the north-west and north-east of the park.

In our considered opinion it is unquestionable that the proposal will have a profoundly negative impact on quantum of open space amenities within this area, negatively impact adjoining residential amenity and must lead the Council to conclude that the proposal would be contrary to the proper planning and sustainable development of the area.

We respectfully submit that given all of the foregoing arguments, reason and considerations, the Council is invited to not permit the Part 8 planning application given the ill-considered nature of the proposal that runs contrary to the proper planning and sustainable development of the area. This is compounded by the inadequacy of the application.

We trust that South Dublin County Council will give due consideration to all matters raised in this submission and request that the Part 8 application deemed to be not permitted.

Yours faithfully,



Anthony Marston (MIPI, MRTPI)  
**Marston Planning Consultancy**

## Appendix A

Craig McCrimmon and Katie Ande	97 St James Rd, Greenhills	D12Y3E9
Dave Murray	235 St James Road, Greenhills	D12A2T0
Niall McKeon	265 St James Road, Greenhills, Dublin 12	D12H9N6
Frank Lougheed	267 St James Road, Greenhills	D12T1X2
Noel Kenny	269 St James Road, Greenhills, Dublin 12	D12W7V2
Phyllis Doyle	289 St James Road, Greenhills	D12P7T3
Rory and Betty O'Connor	332 St James Road, Greenhills	D12HWR1
Anne O'Neill	336 St James Road, Greenhills, Dublin 12	D12H7Y7
Georgina Alford	338 St James Road, Greenhills	D12T6P9
Sinéad Kenny	60 St Brendan's Crescent, Greenhills, Dublin 12	D12V4Y8
Niamh Smith	77 St Brendan's Crescent, Greenhills, Dublin 12	D12X7F2
Johnny McGovern	123 St Brendan's Crescent, Greenhills	D12X6Y6
Hayley Lawson	97 St Anthony's Crescent, Greenhills, Dublin 12	D12N4A0
Brendan O'Flynn	106 St Anthony's Crescent, Greenhills	D12E8YW
Harry and Patricia McKeown	21 St Joseph's Rd	D12 A6X4
Albert and Trish Mc Kenna	94 St Joseph's Rd, Greenhills	D12XY24
Jolanta and Robert Carey	34 Wilkins Court, Limekilnfarm	D12FY0P
Áine Tannian and Yohan Voisin	36 Wilkins Court, Limekilnfarm	D12P9KR
Joanna And Tim Groenland	19 Hardebeck Ave, Walkinstown	D12Y9V3
Amy and Ross Martin	43 St Columba's Road, Greenhills	D12H9Y7
Kathleen Dempsey	18 St Finbar's Close, Greenhills	D12V3H0
Martina Higgins	111 St Patrick's Road, Greenhills	D12RD26