

South Dublin Conservation Society,  
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Cill na Manach,  
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Email: sdc02@gmail.com

Senior Executive Officer,  
Forward Planning Section,  
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Department,  
South Dublin County Council,  
County Hall,  
Town Centre,  
Tallaght,  
Dublin 24.

24<sup>th</sup> April 2022.

**Re: Proposed Material Amendments to the Draft South Dublin County Development Plan 2022 – 2028.**

Dear Sir or Madam,

On the behalf of the South Dublin Conservation Society, we would like to take the opportunity to make the following further observations/comments in relation to the above consultation process regarding the preparation of a new South Dublin County Development Plan for the period 2022 - 2028. We wish to refer to our Society's previous submissions dated the 28/09/2020 (Receipt Number SD-C147-169), the 13/09/2021 (Receipt Number SD-C195-109), and the points raised in the initial consultation process.

We hope that South Dublin County Council will still take on board the various observations/comments raised by us to date in both submission documents.

Our further observations are as follows under various headings and page numbers and relate to wording as outlined in the 'Draft Written Statement Document' which accompanies the current consultation process.

## **Heading - Chapter 2: Core Strategy and Settlement Strategy**

Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town – Rathcoole
Amendment ref.	Amendment 2.13
Page no.	73
Policy/Objective No.	New - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map 07 and 08
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.13 <a href="#">View Consequential Amendments [PDF]</a>
Text/Policy/Objective Amendment Wording	

CS10 SLO1 to be inserted on the lands adjacent to Rathcoole Park: To ensure that the provision of a primary school, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, access road and open space is provided in tandem with new residential development.

CS10 SLO2 to be inserted on lands to the west of Rathcoole: To ensure the delivery of the necessary upgrades to the existing road to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site.

While we welcome the fact that the Rathcoole Woodlands are being retained, we object to the proposed notion of squeezing a primary school and library hub, between the two parcels of lands which are Rathcoole Park and the area now known as ‘Rathcoole Alluvial Woodlands’. These lands should be incorporated together as Parkland/Public Open Space and should be rezoned accordingly as Objective OS – Open Space – ‘*To preserve and provide for open space and recreational amenities*’. The school and library hub should be relocated near to village centre of Rathcoole, which would make more sense from a planning perspective.

## **Chapter 3: Natural, Cultural and Built Heritage**

Chapter/ Section	Section 3.5.2 Protected Structures
Amendment ref.	Amendment 3.13
Page no.	117
Policy/Objective No.	Amend Section 3.5.2 - NCBH19: Protected Structures
Text/Policy/Objective Amendment Wording	

In relation to Amending Section 3.5.2 - NCBH19: Protected Structures to replace NCBH19 Objective 9..... and in particular, NCBH19, Objective 10 which states:

NCBH19 Objective 10 – To investigate the merit of including the following on the Record of Protected Structures and where such merit is identified to undertake the necessary public consultation process under the Planning and Development Acts:

- Palmyra House, Whitechurch Road, Rathfarnham, Dublin 16.
- Friarstown House and outbuildings, Bohernabreena, Co. Dublin D24 F890.
- SIAC Bridge, Monastery Road, Clondalkin, Dublin 22.
- Old Milestone on north-west side of Templeogue Road Set in front of the modern boundary wall of No. 211 Templeogue Road, Dublin 6W.
- Fort (or Callaghan's) Bridge, Kiltipper/Friarstown Upper/Ballinascorney Lower, Dublin 24.
- Granite Boundary Stone outside Nos. 50/52, Whitehall Road, Dublin 12.
- Road sign Bothair An Racadair, Whitehall Road.

All the above should be deemed as protected structures and automatically included on the Record of Protected Structures. There is no need to investigate the merit of such. Their very existence and age should be a valid enough reason to do so.

#### **Chapter 4: Green Infrastructure**

Chapter/ Section	Section 4.2.5 Landscape, Natural, Cultural and Built He
Amendment ref.	Amendment 4.9
Page no.	153
Policy/Objective No.	Insert New SLO GI7 SLO2
Text/Policy/Objective Amendment Wording	

#### **GI7 SLO2:**

To ensure the adequate protection and augmentation of the identified Alluvial Rathcoole Woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status.

Our Society welcomes the inclusion of this amendment.

<b>Chapter/ Section</b>	<b>Section 4.2.5 Landscape, Natural, Cultural and Built He</b>
<b>Amendment ref.</b>	<b>Amendment 4.9</b>
<b>Page no.</b>	153
<b>Policy/Objective No.</b>	Insert New SLO GI7 SLO2
<b>Text/Policy/Objective Amendment Wording</b>	

Addition to Section 4.3.2 – Strategic Corridor 5: Camac River Corridor – Table 4.1

Insert under Stepping Stones in the first column:

**Rathcoole Alluvial Woodlands within RU zoning.**

Add the following objective to the second column:

- **To preserve and protect the Alluvial Woodlands at Rathcoole within the zoning RU as an environmentally sensitive area for biodiversity and ecosystems services of importance having full regard to their Annex 1 status.**

Our Society welcomes the inclusion of this policy/objective.

## **Chapter 9: Economic Development and Employment**

<b>Chapter/ Section</b>	<b>Section 9.2.3 Building on Clusters</b>
<b>Amendment ref.</b>	<b>Amendment 9.4</b>
<b>Page no.</b>	340
<b>Policy/Objective No.</b>	EDE5 SLO 3
<b>Text/Policy/Objective Amendment Wording</b>	
Insert new EDE5 SLO 3 to read; <b>'To ensure development on lands within Greenogue Business Park will be subject to site specific flood alleviation measures forming part of any future planning application for these lands.'</b>	

Proposed Amendment Ref: 9.4



Draft Plan as Published



Proposed Amendment: SLO added

If this is an objective to expand development onto further lands which are a flood zone, then this objective should not take place. This would fly in the face of supposedly learning from previous bad experiences of building on flood zones and would go against current practice of flood alleviation by leaving flood zones in a natural state and not building on them. Natural vegetation, planting of willow, etc. should be encouraged to help slow down flooding.

According to the proposed Map 15 Flood Risk Assessment the whole Greenogue Estate is already under enough pressure from flooding/flood risk.

Chapter/ Section	Section 9.9 Tourism and Leisure
Amendment ref.	Amendment 9.15
Page no.	359
Policy/Objective No.	EDE19 Objective 3
Text/Policy/Objective Amendment Wording	

Amend EDE19 Objective 3 from:

To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy's Wood in accordance with permission granted by An Bord Pleanála in June 2020 or any amending permissions.

To Read:

To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy's Wood ~~in accordance with permissions granted by An Bord Pleanála in June 2020 or any amending permissions~~ **subject to planning.**

Our Society wishes to have EDE 19 Objective 3 removed completely for the Draft County Development Plan in its entirety.

South Dublin County Council should at this stage explore the usage of Friarstown House (in public ownership) or acquired through purchase the former stable buildings of Killakee House (Killakee Restaurant) or Orlagh House (Formerly known as Orlagh College) as a visitor centre for the Dublin Mountains.

It should be the general view of South Dublin County Council to utilise historic buildings as visitor attraction facilities. The following proposed wording should be considered for inclusion in the Draft County Development Plan - *“Promote and assist the development of visitor facilities in existing historic buildings alongside or very near to visitor attractions including mountain regions, greenways, blueways, etc., having due regard for built and natural heritage.”*

## **Chapter 10: Energy**

<b>Chapter/ Section</b>	<b>Section</b>	<b>10.2 Energy Measures</b>
<b>Amendment ref.</b>		<b>Amendment 10.1</b>
<b>Page no.</b>		385
<b>Policy/Objective No.</b>		Amend Policy E9
<b>Text/Policy/Objective Amendment Wording</b>		
<p><b>To amend Policy E9: Small to Medium Scale Wind Energy Schemes from:</b>  Encourage small to medium scale wind energy developments within industrial or business parks and support small community-based proposals in urban areas provided they do not negatively impact upon the environmental quality, and visual or residential amenities of the area.</p> <p><b>To Read:</b>  Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals <b>for domestic use</b> in urban areas <b>and feedback of surplus to the grid</b>, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</p>		

We proposed the following further amendments

To Read:

Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals **for domestic use** in urban areas, **to include storage batteries as standard, and feedback of surplus to the grid, with commensurate remuneration as soon as this has been legislated for**, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.

## **Chapter 11: Infrastructure and Environmental Services**

<b>Chapter/ Section</b>	11.8 Airports and Aerodromes
<b>Amendment ref.</b>	Amendment 11.14
<b>Page no.</b>	590
<b>Policy/Objective No.</b>	Amend Section 13.9.3 (iii) Lighting
<b>Text/Policy/Objective Amendment Wording</b>	

We would like to suggest the following adjustment.

Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, ~~2020~~ **2021 and any subsequent revisions.**

(<https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>)

## **Chapter 13: Implementation and Monitoring**

<b>Chapter/ Section</b>	Section 13.3.2 Green Infrastructure and Development Managemen
<b>Amendment ref.</b>	Amendment 13.5
<b>Page no.</b>	537
<b>Policy/Objective No.</b>	Section 13.3.2
<b>Text/Policy/Objective Amendment Wording</b>	
Amend Section 13.3.2 Green Infrastructure and Development Management under 'Greening Factor'	
From	

### **Green Space Factor (GSF)**

The GSF is a score-based requirement that establishes minimum standards for landscaping and GI provision in new developments (See Table 1 in Green Space Factor Guidance Note). Minimum scoring requirements are based on the land-use zoning of a site (See GI5 Objective 4), this applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq.metres. Qualifying developments are required to reach the

minimum Green Space Factor (GSF) score established by their land use zoning. Developers can improve their score by both retaining and enhancing existing landscape features and incorporating new features.

A developer will be required to specify the Green Space Factor (GSF) measure included within a proposed development as part of the submitted Green Infrastructure Plan and Landscape Plan. To facilitate the evaluation of the GSF score for a proposed development the Council will make available a Green Space Factor (GSF) Worksheet to applicants which will be required to be submitted with a qualifying planning application. A Green Space Factor (GSF) Guidance Note will also be made available on the Council's website under the Development Plan section setting out the applicable weightings and scorings. This will allow developers to calculate the overall site area and the surface areas of contributing to the Green Space Factor (GSF)s to see whether a proposed development achieves the required minimum score. Where applicable, a completed worksheet shall be submitted with the Green Infrastructure Plan and Landscape Plan in support of a proposed development.

### **Minimum Score Not Achieved**

In cases where proposed development does not meet the minimum required score and the Council agree that the minimum score is not achievable on the site; the Council will engage with the applicant to help determine an alternative GI solution, to ensure that the proposed development does not detract from the local environment and makes a positive contribution to local GI provision. Where site-specific constraints do not allow for adequate landscaping features in line with minimum requirements (e.g. for infill development or certain brownfield sites) a developer will be permitted to provide alternative GI interventions or contributions to make up for this shortcoming, see below. Those GI measures ultimately chosen will be dictated by the site-specific context and will be subject to agreement with Council.

### **Sites with a Particular Sensitivity**

Further, where a subject site is considered to be particularly sensitive or valuable from a GI perspective, developers will be required to engage with the Council to determine those GI interventions that will be required to ensure the environmental integrity of the site. This will primarily apply to sites located within or adjacent to primary and secondary GI corridors (see Figure 4.4). In such cases, specific consideration will be required to ensure that development does not fracture the existing GI network and preserves or enhances connectivity. Such sites may require the implementation of additional site-specific interventions to reflect their value.

### **Alternative GI Interventions**

As indicated above, in cases where an applicant / developer faces particular difficulties in meeting the required minimum score due to site specific constraints, the Council will engage with the applicant to help determine an alternative GI solution to make up for any shortcoming. The following comprises a non-exhaustive list of interventions that developers can implement in order to enhance GI in the local area.

- The use of natural features such as woodlands, hedgerows, trees, water courses, ponds and grasslands or other natural methods to strengthen GI assets and provide connections to the wider GI network.



- The incorporation of nature-based solutions such as SuDS schemes, permeable paving, green and blue roofs, green walls, swales, SuDS tree pits, raingardens, ponds to support local biodiversity and mitigate potentially harmful effects of development.
- The provision of new native tree and plant species as well as pollinator friendly species within developments, consistent with National Pollinator Plan.
- Where possible, no net loss of existing trees/hedgerows on site.
- The provision of bird boxes (as building façades for nesting sparrows or swift bricks), bat boxes, hedgehog passes, and other wildlife interventions as required in landscape settings.
- The provision of bee bricks in new development.
- The retention of heritage features such as old walls, bridges etc. that have habitat value.
- The provision of allotments/orchards for residents to grow fruits and vegetables.
- Use of recycled/upcycled or locally sourced natural materials within the development.
- GI management/maintenance plans to be included as part of the landscape plans submitted for the Planning process. May include hedgerow/ tree and grassland management plans
- The provision of environmentally sensitive recreation and connectivity between GI areas. Those GI measures ultimately chosen will be dictated by the site-specific context and will be subject to agreement with the Council.

We commend the amendments proposed here to retain, protect and enhance Green Infrastructure.

<b>Chapter/ Section</b>	Section 13.9.3 Environmental Hazard Management (iii) Lighting
<b>Amendment ref.</b>	<b>Amendment 13.11</b>
<b>Page no.</b>	590
<b>Policy/Objective No.</b>	Amend Section 13.8.3
<b>Text/Policy/Objective Amendment Wording</b>	

We would like to suggest the following adjustment.

Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, ~~2020~~ **2021 and any subsequent revisions.**

(<https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>)

### **The Scott Cawley Natura Impact Report for the Draft South Dublin County Development Plan 2022-2028**

We commend all the additional assessment wording proposed by the Scott Cawley Natura Impact Report for the Draft South Dublin County Development Plan 2022-2028 which seeks to strengthen protection for and avoid damage to the existing natural environment in South Dublin County and in particular the NATURA 2000/European conservation sites downstream.

We note the general assessment wording, as highlighted below, which concerns most of the proposed material amendments, and which highlights the potential negative risks involved.

*This amendment has potential for significant negative effects on European sites, given that there could be associated water pollution and there exists hydrological connectivity in the county with downstream European sites in Dublin Bay.*

If there is potential for harm to the natural environment then the precautionary principle should apply, i.e., refrain from that activity or development. It has already been stated that there is no need for any further land to be rezoned for housing development, therefore no further land should be rezoned for such, e.g., P. 45, Ref. 2.15, Map 9, don't change this piece of land from Objective RU to Objective RES.

Therefore, it would be prudent of South Dublin County Council to adhere to the recommendations of their consultants, Scott Cawley, and not incorporate into Draft South Dublin County Development Plan 2022-2028 or proceed with any material amendments that will impact negatively on European/Irish conservation sites within the South Dublin County administrative area and further downstream. i.e., Dublin Bay.

**Draft South Dublin County Development Plan 2022-2028 – Amendments Stage Strategic Environmental Assessment (SEA) Environmental Report (Volume 2)**

We also commend the environmental assessment of the Draft South Dublin County Development Plan 2022-2028 and carried out by South Dublin County Council's consultants Brady Shipman Martin.

Their SEA assessment of the various material amendments indicates several 'uncertain' or 'potentially negative' environment effects requiring mitigation measures which may or may not work.

Therefore, it would be prudent of South Dublin County Council once again to adhere to the recommendations of their consultants, Brady Shipman Martin, and not incorporate into Draft South Dublin County Development Plan 2022-2028 any material amendments that will impact negatively on the natural and built environment.

We hope that South Dublin County Council will take on board the above observations and in doing so incorporate them into the final County Development Plan (2022 - 2028).

Yours sincerely,



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Pádraig MacOitir

On the behalf of the South Dublin Conservation Society