



Senior Executive Officer
Forward Planning Section,
Land Use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24

26 April 2022

Dear Sir / Madam,

**RE: Proposed Material Alterations to the Draft South Dublin County Development
Plan 2022-2028**

Further to the notice given to this Department of the publication of the Proposed Material Alterations to the Draft South Dublin County Development Plan 2022-2028, the following submission outlines its observations in respect of a number of policy areas for which the Department is responsible.

Climate Action

We would note that the revised Climate Action Plan 2021 has been published and request that the Draft Plan be updated to reflect same where possible (and the revised ambition and targets therein), having regard to the material alterations being proposed (acknowledging that there are no proposed material alterations to Chapter 1 – Introduction, Strategic Vision and Climate Action).

Electricity Infrastructure

The improvement of Ireland's electricity grid infrastructure is a critical component of its energy security and the Department notes the inclusion of a new Section 11.5 – Electricity Infrastructure (Amendment no. 11.7). It is considered that the inclusion of this new section is appropriate and is broadly reflective of Government policy and the Regional Planning Policies. In particular, it reflects the requirements of the Policy



Statement on Security of Electricity Supply (November 2021). We would also note the publication of the National Energy Security Framework (April 2022) and consider that the inclusion of the new Section 11.5 can support the actions set out therein. It is important, therefore, that this new section of the proposed Draft Plan is not amended, omitted or removed during the finalisation of the new County Development Plan.

Offshore Energy

The inclusion of a reference to the Offshore Renewable Energy Development Plan and any successor thereto (i.e. OREDPII) at the newly proposed Section 11.5, Policy no. IE6 Objective 3 (Amendment no. 11.7) is noted and welcomed. We would, however, request that the name of the Department be amended to the Department of Environment, Climate and Communications in same.

Energy

Regarding Amendment no. 10.1, we would encourage the scope of this proposal to be extended beyond 'domestic use' in order to facilitate micro-generation in the future beyond the domestic scale. As such we propose the following amendment to the proposed wording of policy E9:

'Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals that can encourage self-consumption on a community scale whilst feeding any surplus back to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.'

Geological Survey Ireland

Additional observations from Geological Survey Ireland are attached to this submission.

Conclusion

We would be grateful if South Dublin County Council would take these matters under consideration in the finalisation South Dublin County Development Plan.



Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of Environment, Climate and Communications relevant to the preparation of this plan.

Officials can provide support to the County Council in the following areas:

- Climate Action, Engagement and Adaptation
- The Circular Economy
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- Communications
- Environmental Policy and Governance
- Waste and Natural Resources

Please direct any requests for further consultation to planningadvisory@decc.gov.ie

Regards,

Corporate Support Unit

Department of Environment, Climate and Communications

Encl. Divisional observations



Senior Executive Officer
Forward Planning Section
Land Use Planning & Transportation Department
County Hall,
Tallaght
Dublin 24

11 April 2022

Re: Proposed Material Amendments to the Draft South Dublin County Development Plan

Your Ref: n/a
Our Ref: 22/110

Dear Sir/Madam,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 30 March 2022, concerning the Proposed Material Amendments to the Draft South Dublin County Development Plan, Geological Survey Ireland would like to make the following comments.

Geoheritage

In Chapter 3: 'Natural, Cultural and Built Heritage', Section 3.3.7 'Geology', NCBH12 Objective 1, we are pleased to see the following amendment:

Amendment Ref: 3.9	Page 101	Amend Section 3.3.7 Geology	Amend Section 3.3.7 Geology NCBH12 Objective 1 as follows: From To protect identified County Geological Sites from inappropriate development, and to promote the importance and potential of such sites through the County's Heritage Plan. To read To protect identified County Geological Sites from inappropriate development, avoiding potential conflicts with other ecological and cultural assets by engaging in consultation , and to promote the importance and potential of such sites through the County's Heritage Plan.
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Culture and Tourism

In Chapter 9: 'Economic Development and Employment', we commend the inclusion of geology for consideration as part of potential information signage within objective 'EDE21 Objective 4'.

Amendment 9.21	360	EDE21 Objective 4	Amend EDE21 Objective 4 from: To implement signage in the County in accordance with the Tourism and Signage Strategies for the County, to include consideration of information signage on nature and other features to be found along the rivers in the County at strategic locations. To Read: To implement signage in the County in accordance with the Tourism and Signage Strategies for the County, to include consideration of information signage on nature, geology and other features to be found along the rivers in the County at strategic locations and at other strategic locations within the County.
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Natural Resources (Minerals/Aggregates)

We welcome the inclusion of our ‘Geological Heritage Guidelines for Extractive Industries’ guideline document as an addition to objective EDO25 Objective 1 in Section 9.10 ‘Quarries and Mineral Extraction’:

Amendment 9.27	365	Amend EDE25 Objective 1	<p>Amend EDE25 Objective 1 from: To facilitate mineral extraction in suitable locations subject to the protection of amenity and environmental quality, including air quality and noise pollution.</p> <p>To Read: To facilitate mineral extraction in suitable locations subject to the protection of amenity and environmental quality, including air quality and noise pollution and having regard to the</p>
			<p>Geological Heritage Guidelines for the Extractive Industry’ (GSI and Concrete Federation of Ireland, 2008).</p>

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes
following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018
(S.I. No. 296 of 2018)

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a21718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcca.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9e46be08de41278b90a9916d0c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcca.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?zasting=7&northing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

- Notes:
1. The maps and data listed above are available on the Geological Survey Ireland map viewer <https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx>
2. Please read all disclaimers carefully when using Geological Survey Ireland data
3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.