

COMHAIRLE CONTAE ÁTHA CLIATH THEAS
SOUTH DUBLIN COUNTY COUNCIL



MEETING OF RATHFARNHAM/TEMPLEOGUE-TERENURE AREA COMMITTEE

Tuesday 10th October 2017

Part 8 Report

**Proposed Part 8 Public Consultation for the development of Mt Carmel Park,
Dodder Valley**

Report on Part 8 consultation process for the above proposal.

This is a proposal to develop and enhance a section of the existing parkland at Mt. Carmel Park, Dodder Valley, Firhouse, by the provision of the following recreation and amenity facilities:

- A 400m Eight-Lane Grass Running Track
- A 100 x 60m Grass Soccer Pitch
- A BMX track
- Proposed shared changing room / club house facilities
- Extension of the existing pathway system
- A signed nature trail: The Ogham Tree Nature Trail
- All ancillary works

400m 8 lane grass athletics track

The proposed new track is designed to cater for the expansion in athletics clubs memberships that has been experienced in the last 10 years in particular and to provide a facility that will help to improve the capacity of local clubs to compete at a higher level in organised events. The proposed new location will be situated to the rear of a local national school, Scoil Carmel, and the school should be able to use this facility during school hours in particular. The location in the Dodder Valley is excellent, with an existing car park and a long linear park suitable for cross country training also.

90m x 60m Grass Soccer Pitch

This facility will provide extra capacity in relation to pitch provision for local soccer clubs and relieve pressure on the existing pitches in this area of the county.

BMX track

BMX has become a popular sport in Ireland and is particularly popular with teenagers and adults alike, both male and female. It is Bicycle racing on specially prepared dirt tracks over jumps and around banked turns. Typical tracks are 350m in length. The sport originated in Holland in the 1950s, popularised in the USA in the 1970s and in 2008 became an Olympic Medal event.

The track will be let by agreement with South Dublin County Council to a local BMX Club; within BMX Ireland (a subsidiary of Cycling Ireland).

The design of the track will be subject to further detail design to ensure it is an appropriately challenging course and fit for purpose.

Shared changing room / club house facilities

In order to provide changing facilities for users of the park facilities. The detail design of this facility will be subject to detail design but will generally follow the design of recently completed and planned changing facilities in South Dublin Parks.

Extension of the existing pedestrian path system

In order to maximise use of this park, for walking in particular, but also to allow for proper access to the site from the adjoining school and car park and to connect into the existing path system it is proposed to extend the pedestrian path system and as outlined in the accompanying drawing.

A signed nature trail: The Ogham Tree Nature Trail

A proposal for an Ogham Tree Nature Trail was made by the Public Participatory Network (PPN) and this site identified. It is proposed to site groups of native trees (clear-stemmed to allow for views under the tree canopies), at the recently constructed pedestrian and cycle entrance to Dodder Valley Park and at locations throughout the park; where they will have little impact on the existing high quality grassland. The exact locations and the species groups will be to further detail; in liaison with the PPN, the Heritage Officer and National Parks and Wildlife Services. The trail will be signed; with information on native tree species and also historical data; on how the ancient Ogham alphabet corresponded to native Irish trees.

Proposed Natural Heritage Area/ Wildlife Area

All of the Dodder Valley Park is traversed by the River Dodder and has good vegetation cover and is nationally recognised for biodiversity. The proposed development in this area of the Dodder Valley will be undertaken in the knowledge of this section of the Dodder Valley being a proposed Natural Heritage Area (pNHA) as designated by the NPWS of the Department of Arts, Heritage and the Gaeltacht. There will be consultation with the NPWS on this proposal. The proposal has been subject to an Appropriate Assessment screening process. (Appropriate Assessment is a process for assessment of the likely significant effects of every plan or project on the Natura 2000 network). It has been deemed unlikely to cause significant affects to any Natura 2000 sites.

The proposal has been subject to Ecological Impact Assessment. This examined and identified the sensitive ecological environment of the Dodder Valley and allowed the design to be modified from that originally proposed in October 2015 to the current proposals within the Part 8 drawings. These design changes were made in order to mitigate the potential impact of the design and resulted in the re-location and concentration of the proposed facilities to lower value habitats. Further mitigation measures include; the prevention of pollution of nearby water bodies during the course of construction, the retention and protection of all trees and hedgerows being retained on site, discouraging ground nesting birds during the course of construction by keeping grassland cut short during this period and the implementation of measures to maintain and enhance high value grassland habitats post construction. Compensatory measures are also being proposed for loss of grassland habitat; including a proposed 80m long species rich hedgerow reinstatement and the reinstatement of grassland turves taken from the rich grassland during construction and stored for re-instatement post construction.

In order to protect as much as possible of the existing vegetation; the hedgerows will be protected and a portion of hedgerow that has deteriorated over the years will be reinstated. The areas identified as having significant high value grassland area will be protected and enhanced by the implementation of a specific grassland management regime. In addition the surrounding areas of the athletic track and the football pitch will not be reseeded and will be allowed to seed freely and will be maintained in accordance with best biodiversity practice and in consultation with the Heritage Officer of South Dublin County Council and the NPWS.

1. Introduction

1.1 Purpose of the Report

The purpose of this Chief Executive's Report is to present the outcome of the Part 8 consultation, to respond to submissions made during the consultation period and to make recommendations in relation to the proposed development where appropriate.

1.2 Structure of the Report

This report provides the following:

- An introduction including details on the purpose of the report and an outline of the public consultation programme that was carried out.
- Description of Proposed Development
- List of Submissions received
- A summary of the issues raised in the submissions made during the consultation period together with the Chief Executive's Responses and Recommendations.
- Assessment as to whether or not the proposed development would be consistent with the proper planning and sustainable development of the area.
- Recommendation as to whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be.

1.3 Outline of Public Consultation Programme

1.3.1 Non – Statutory Consultation

N/A

1.3.2 Statutory Consultation

A meeting prior to commencement of Part 8 took place on the Tuesday 13th June 2017 with the Rathfarnham, Templeogue, Terenure Committee Members.

The proposal has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC).

Plans and particulars of the proposed scheme will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy from **Thursday the 6th July 2017 to Monday 21st August 2017** at the following locations:

- South Dublin County Council Offices, County Hall, Tallaght, Dublin 24 between the hours of 9:00am – 5.00pm Monday to Thursday and 9.00am - 4.30pm on Friday (**Inspection and purchase**)
- County Library, Tallaght, Dublin 24, between the hours of 9.45am to 8pm Mon to Thurs, 9.45am to 4.30pm Fri to Sat, Closed Saturdays and Mondays of Bank Holiday Weekends (**Inspection only**)
- Ballyroan Library, Orchardstown Avenue, Rathfarnham, Dublin 14, between the hours of 9:45 am – 8.00pm Mon to Thurs, 9.45am-4.30pm Fri to Sat, Closed Saturdays and Mondays of Bank Holiday Weekends (**Inspection only**)
- The plans and particulars can be viewed on the Council's Public Consultation Portal website <http://consult.sdublincoco.ie>

Submissions or observations with respect to the proposed development dealing with the proper planning and sustainable development of the area in which the proposed development will be situated may be made in writing up to **4.30 pm on Friday 29th September 2017** and may be submitted either: **via Online Submissions:** <http://consult.sdublincoco.ie> **or By post to :** Senior Executive Officer, Environment Water and Climate Change Department, South Dublin County Council, County Hall, Tallaght, Dublin 24 YNN5.

A total of 13 submissions were received by 4.30pm on Friday 29th September 2017.

1.4 Legislative Background

Section 179 (3) of the Planning and Development Act 2000 (as amended), requires that the Chief Executive of a local authority shall, after the expiration of the period during which submissions or observations with respect to the proposed development may be made, in accordance with regulations under subsection (2), prepare a written report in relation to the proposed development and submit the report to the members of the authority.

Section 179(b) outlines that a report prepared in accordance with paragraph (a) shall—

- (i) describe the nature and extent of the proposed development and the principal features thereof, and shall include an appropriate plan of the development and appropriate map of the relevant area,
- (ii) Evaluate whether or not the proposed development would be consistent with the proper planning and sustainable development of the area to which the development relates, having regard to the provisions of the development plan and giving the reasons and the considerations for the evaluation.
- (iii) list the persons or bodies who made submissions or observations with respect to the proposed development in accordance with the regulations under subsection (2),
- (iv) summarise the issues, with respect to the proper planning and sustainable development of the area in which the proposed development would be situated, raised in any such submissions or observations, and give the response of the Chief Executive thereto, and
- (v) Recommend whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be.

Under Section 179(4) of the Planning and Development Act, members of a local authority shall, as soon as may be, consider the proposed development and the report of the Chief Executive. Following the consideration of the Chief Executive's report, the proposed development may be carried out as recommended in the Chief Executive's report, unless the local authority, by resolution, decides to vary or modify the development, otherwise than as recommended in the Chief Executive's report, or decides not to proceed with the development. A resolution must be passed not later than 6 weeks after receipt of the Chief Executive's report.

2. Proposed Development

2.1 Description of the Proposed Development

The proposal consists of developing and enhancing a section of the existing parkland at Mt. Carmel Park, Dodder Valley, Firhouse, by the provision of the following recreation and amenity facilities:

- A 400m Eight-Lane Grass Running Track
- A 100 x 60m Grass Soccer Pitch
- A BMX track
- Proposed shared changing room / club house facilities
- Extension of the existing pathway system
- A signed nature trail: The Ogham Tree Nature Trail
- All ancillary works

The proposed has undergone Appropriate Assessment (AA) Screening under the Habitats Directive (92/43/EEC) and an Ecological Impact Assessment (EcIA) process.

2.2 Plans and Details

Plans and details are available at the following link:

<https://consult.sdublincoco.ie/en/consultation/part-8-recreational-project-dodder-valley-mt-carmel>

3. List of Submissions

13 submissions were received during the specified period of the public consultation in respect of the proposed development from the following:

CVQ - 281	Cllr Brian Lawlor
CVQ – 291	Cllr Sarah Holland
CVQ – 292	Mr Kevin Higgins
CVQ – 319	Mr Gerard Stockil – Tallaght Community Council
CVQ – 322	Padraic Larkin
CVQ – 422	Cllr Dermot Looney
CVQ – 489	Brothers Pearse AC
CVQ – 491	Brothers Pearse AC – signed support letters
CVQ – 514	Brothers Pearse AC – signed support letters
CVQ – 527	Mr Eugene Barrett – Knocklyon Network Proposals to SDCC
CVQ – 537	Department of Culture, Heritage & the Gaeltacht
ENV - 001	Parkwood Residents Association – Denise Delappe, Secretary
ENV – 002	BMX Ireland Ltd

4. Summary and Categorisation of Issues Raised and Chief Executive's Responses

4.1 Introduction

This section presents an analysis of the submissions and includes a summary of each of the issues raised and the responses and recommendations of the Chief Executive.

The responses of the Chief Executive have been framed taking account of the statutory obligations of the local authority, relevant Government and Ministerial guidelines and the proper planning and sustainable development of the area.

4.2 Summary of Issues Raised, Responses and Recommendations

Submission No.1 Cllr Brian Lawlor [..\Submissions\CVQ-281 - Cllr Brian Lawlor.pdf](#)

This submission relate to the following issues:

1. With the Council proceeding with the Dublin Mountain Project and the Dodder Greenway route adjacent to this Part 8 and the development of 2 new primary schools bringing the number up to 5 large primary schools locally and a very large secondary school to be opened in Sept 17/18 in the Firhouse Area. The volume of people young and old that will be coming into this area to explore the Dodder Greenway, the Dublin Mountain Project and use all the great facilities in the proposed part 8, it's imperative that a large style regional Playground is included in this part 8 development

Chief Executives Response and Recommendation:

1. Proposed Playground in Dodder Valley Park is agreed; to be included in the Part 8. Location and detail will be subject to ecological and environmental evaluation and detailed design. It is unlikely that this particular portion of Dodder Valley off Firhouse Road will be suitable due to the ecological constraints; however exact location will be considered at the detailed design stage.

Submission No.2 – Cllr Sarah Holland [..\Submissions\CVQ-291 - Cllr Sarah Holland.pdf](#)

This submission relates to the following issues:

1. There is space for a playground here, perhaps with separate areas for older & younger kids. There aren't many play spaces in this community and facilities will be welcomed in an area full of growing families. This would widen the appeal and use of the area.
2. I would like to see adequate provision made for parking and secure bike parking, to ensure minimal disruption in surrounding streets.
3. Dog fouling and dumping is a problem across the county, so there should be adequate provision of waste bins and dog poo bins
4. A secure area for dogs to run off lead would be welcome

Chief Executives Response and Recommendation:

1. Proposed Playground in Dodder Valley Park is agreed; to be included in the Part 8. Location and detail will be subject to ecological and environmental evaluation and detailed design. It is unlikely that this particular portion of Dodder Valley off Firhouse Road will be suitable due to the ecological constraints; however exact location will be considered at the detailed design stage.

2. Noted, car parking is considered adequate and a traffic management plan will be included at detailed design stage. Bicycle parking will be incorporated into the design.

3. All litter bins in the county can be used for disposal of dog waste. However increased provision of bins will be considered at the detailed design stage in conjunction with the waste management section.

4. An off leash dog run area has been included for consideration within the Dodder Greenway proposals. It is considered that the area subject to this part 8 is unlikely to be considered suitable for a dog run area due to the ecological constraints.

Submission no. 3 - Kevin Higgins [..\Submissions\CVQ-292 - Kevin Higgins.pdf](#)

This submission relates to the following issues:

1. The areas of Knocklyon & Firhouse have always lacked a local playground. There is a massive population of young families in the area & too few utilities the amenity of Dodder Valley due to the lack of facilities. A playground offers so much to a community & given the whole area is being developed it's now the perfect time to make it happen. Evidently finding

space is always an issue which is why I propose it be situated to the left of the front entrance to the park. It not maybe it could be situated where the proposed BMX track is to be located. I spoke with many community groups on this issue & have yet to find a single individual who will be using this BMX track

Chief Executives Response and Recommendation:

1. Proposed Playground in Dodder Valley Park is agreed; to be included in the Part 8. Location and detail will be subject to ecological and environmental evaluation and detailed design. It is unlikely that this particular portion of Dodder Valley off Firhouse Road will be suitable due to the ecological constraints; however exact location will be considered at the detailed design stage.

**Submission no. 4 – Tallaght Community Council - Gerard Stockil ..
[..\Submissions\Part 8 Consultation, Mount Carmel - Gerard Stockil - TCC.docx](#)**

This submission relates to the following issues:

1. Plan does not show the full impact of all the already begun & now proposed development in the area to allow a fully informed appraisal of adding more development into the Dodder Valley Park
2. Balance and connectivity in the Dodder Valley – we believe both sides of the Dodder banks should be looked at collectively – not in isolated and separate Part 8s
3. Connectivity – suggestion to locate the tree trail & nature trail across Bawnville & Kilinenny – both sides of the Dodder
4. Maintenance – impact of more public facilities on existing budgets & resources
5. Budget & Sustainability
6. Design – strongly advised of the sensitivity of this valley area in recent years – which we accept. We are looking for assurances that any sports structure should have consistent, high quality design, use as many natural materials as possible to ensure it sits comfortable in this parkland setting.

Chief Executives Response and Recommendation:

- 1. Both the proposed Dodder Greenway and this current plan were considered in terms of possible cumulative impact. The line of the Dodder Greenway through the park is shown on the Part 8 drawings**
- 2. The proposals for the Part 8 currently under consideration relate to this section of the Dodder Valley.**
- 3. This could be considered as a further phase should this project prove successful.**
- 4. There is a requirement for playing pitches to accommodate an increasing population and support active recreation. The Council provides an annual budget each year to provide for the maintenance of same. While public finances are always limited; the council endeavours to meet their commitments with the resources that are available to it.**
- 5. The facility is proposed as a shared facility that will provide meeting space / changing facilities and toilet facilities for appropriate users of the park facilities. It is normal procedure that these facilities are subject to an annual licence agreement.**
- 6. Noted. It is intended to design the facilities to a high standard to blend in with the natural environment and the high value ecological and parkland setting.**

Submission no. 5 – Padraic Larkin [..\Submissions\CVQ-322 - Padraic Larkin.pdf](#)

This submission relates to the following issues:

1. Please consider placing some seating along the pathways particularly along the route between the new bridge and the Firhouse weir. Many elderly people use the park for walks and the distance to the weir is prohibitive without providing a rest point or points along the way.

Chief Executives Response and Recommendation:

1. Noted. This will also be considered at the detailed design stage and would be an enhancement of the proposed Ogham Tree Trail.

Submission no. 6 – Cllr Dermot Looney - [..\Submissions\CVQ-422 - Dermot Looney.pdf](#)

1. I note the proposals for the scheme and express my general support – I would like to see an inclusion of a regional playground given serious consideration in this area on the request of local residents and community groups.

Chief Executives Response and Recommendation:

1. Proposed Playground in Dodder Valley Park is agreed; to be included in the Part 8. Location and detail will be subject to ecological and environmental evaluation and detailed design. It is unlikely that this particular portion of Dodder Valley off Firhouse Road will be suitable due to the ecological constraints; however exact location will be considered at the detailed design stage.

Submission no. 7 –Brothers Pearse AC – [..\Submissions\CVQ-489 Brothers Pearse AC Sep17 Submission final.pdf](#)

Looking for the following

- (1) Safe & secure track and field to train on.
- (2) Sufficient lighting of the area, including on the paths to and from the track & field. And the track itself.
- (3) Requests infield area will be levelled, drained, cultivated and seeded.
- (4) Shared facilities that are within a reasonable distance of the track.
- (5) Boundary requested between the river and the track and some form of fencing requested around the facility

Chief Executive Response and Recommendation:

1. Noted

2. Lighting is proposed along the main footpath as part of the separate Dodder Greenway Part 8 proposals and under very stringent conditions only. The ecological assessment precludes the use of further lighting within the park and, while the footpath to and from the proposed track will be lit, it is not possible to light the track itself. This was discussed and agreed with the club on a number of occasions previously.

3. Noted; drainage requirements will be considered following site investigations at the detailed design stage. The ecological evaluation carried out precludes this infield area being re-seeded. It will be drained if necessary, cultivated, levelled and allowed to re-seed naturally, as discussed with the club previously.

4. The exact location of the shared changing facilities / clubhouse will be considered at the detailed design stage subject to ecological evaluation and discussion with relevant stakeholders. However the location close to the car park is considered most viable for a number of reasons and has been ecologically evaluated. The request for storage will be considered at the detailed design stage and will also be subject to ecological and design considerations.

5. The existing hedgerow marks the boundary to the river; this will be reinforced with native planting. A further boundary around the facility with appropriate fencing will be included at the detailed design stage.

Submission no. 8 – Brothers Pearse AC-Support 1 - [..\Submissions\CVQ-491 Brothers Pearse AC Signed petition.pdf](#)

See Submission No 7

Chief Executive Response and Recommendation:

1. Noted. See response to Submission 7 above.

Submission no. 9 – Brothers Pearse AC-Support 2 - [..\Submissions\CVQ-514 Brothers Pearse AC Signed petition2.pdf](#)

See Submission No 7

Chief Executive Response and Recommendation:

1. Noted. See response to Submission 7 above.

Submission no. 10 – Mr Eugene Barrett-Knocklyon Network Proposals to SDCC - [..\Submissions\CVQ-527 - Eugene Barrett.pdf](#)

- (1) Welcome addition of amenities & facilities
- (2) Do not agree with the naming of the park
- (3) Important that development will be in line with the Dodder Greenway Proposals
- (4) Want SDCC to not do any work that might prevent at a future date the re-introduction of the proposed Public Transport Bridge
- (5) Like to see some proposals to improve the Balrothery Weir
- (6) Dodder Valley Park-Knocklyon needs to be included in the Regional Playground programme
- (7) Siting of trees to be reviewed
- (8) Welcome the Ogham Tree Trail but would like the location moved to the other side of the pathway
- (9) Welcome the Wildflower area but would like it increased or additional areas added
- (10) Some native Irish Fruit trees would encourage the bird & animal diversity in the area.
- (11) We propose more seats along the pathways
- (12) Mixed hedging & planting should be place along the boundary walls to the south of the area
- (13) Request for solar bins at the two entrances to the park. More may be required nearer the Sports facilities & changing rooms
- (14) Propose adult activity machines spaces around the pathways & possibly lit by Solar panels like you see in Lough Key Forest Park

Chief Executive Response and Recommendation:

1. Noted.
2. This area is known in the local area as Mt Carmel, many parts of the Dodder Valley contain local names.
3. Noted. Yes; both have been assessed on a cumulative impact basis.
4. Request noted. The bridge mentioned is not a part of the council's current development plan. These proposals are located at some distance from the original proposed bridge.
5. Noted. Proposals requested are part of a separate Part 8 (Dodder Greenway).
6. Proposed Playground in Dodder Valley Park is agreed; to be included in the Part 8.
8. Location and detail will be subject to ecological and environmental evaluation and detailed design. It is unlikely that this particular portion of Dodder Valley off Firhouse Road will be suitable due to the ecological constraints; however exact location will be considered at the detailed design stage.
7. Noted. The existing trees will be reviewed as part of the landscape proposals for the Dodder Greenway; however the retention of trees along the river bank prevent light spill onto the ecological corridor of the river and protect bat and mammal movements.

8. The Ogham Tree trail will be sensitively designed using existing trees where possible.
9. The wildflower area utilises existing meadowland as it is self-naturalised in that location. The extension of meadow land will be considered where possible (using self-generation where possible.)
10. Noted; will be included within the Ogham Tree trail.
11. Noted; will be considered as part of detailed design stage.
12. Noted; will be incorporated where possible.
13. Currently a pilot project for solar bins being undertaken in the county. However increased provision of bins will be considered at the detailed design stage in conjunction with the waste management section.
14. Noted will be considered at detailed design stage subject to funding.

Submission no. 11 - Department of Culture, Heritage & the Gaeltacht
<..\Submissions\CVQ-537 - Dept of Culture Heritage & the Gaeltacht.pdf>

This submission relates to the following issues:

1. Archaeology Observations – Recommended that SDCC engage the services of a suitability qualified archaeologist to advise on archaeological impacts and likely archaeological impacts that may derive from proposed new works within the park
2. Requirement for EcIA. Importance of river environment as an ecological corridor and wildlife refuge in the urban area. Dodder River corridor hosts a number of species and habitats listed on the Birds and the Habitats Directives. Also of importance to a number of rare and protected flora and fauna species. pNHAs should be managed in the first instance for nature conservation. Where amenity use does not conflict, or negatively impact on the biodiversity, this can also be accommodated.
3. Welcomes the lack of lighting proposed. Also the placement of the BMX track away from area of high ecological potential. Has concerns that lighting may become an issue in future years; which would be detrimental to bat species. Requests that this Part 8 agrees a condition that no artificial illumination of the proposed football pitch, the proposed athletics track and proposed BMX track will be allowed in future years.
4. Requests that the three Local Authorities who cover the River Dodder devise a comprehensive biodiversity action plan for the River Dodder, as outlined in submission to the Dodder Greenway.
5. Would welcome measures to reduce disturbance of adjacent riparian woodland to protect it and the rare invertebrate fauna.
6. Requests condition that the athletic track infield and track surrounds are left to seed naturally and that managed as per previous recommendations.
7. This Department notes that the area that the Council reseeded with a wildflower seed mix has become ecologically significant and the Department welcomes the fact that the Council will manage it for nature conservation as per the EcIA recommendations. This Department recommends that the mitigation measures in the EcIA should be implemented in full.

Chief Executives Response and Recommendation:

1. Agreed.
2. Noted. Ecological surveys were carried out within the area in question over a number of years previous to the current proposals as a result of the feasibility and preliminary design stages of the proposed Dodder Greenway. The results of these surveys are available to the project team and were used to inform the design. An EcIA was carried out and used to inform the initial proposals and preliminary design of the facilities; an iterative design process is good design practice. The surveys and EcIA will be utilised during the subsequent detailed design stages. The EcIA was provided to Department on request.
3. Agreed.
4. The EcIA for the Dodder Greenway (Part 8 running concurrently with this one) identified important ecological features (Chapter 4) and provided mitigation (Chapter 7) for the potential impacts as a result of the greenway construction and operation.

The Enhancements section (Chapter 8) of the EcIA for the Dodder Greenway detailed the recommendations for improving the ecological value of the Dodder corridor which are similar to the type of recommendations that would be made in a Biodiversity Action Plan.

It is considered that the proposed mitigation, enhancements and post-construction monitoring as detailed in the EcIA for the Dodder Greenway provide adequate protection for the biodiversity along the Dodder corridor.

SDCC would welcome a Biodiversity Action Plan for the entire river corridor, separate to this Part VIII application, especially with respect to the control of invasive species and preserving quiet/ dark areas of the river corridor.

5. The proposed footpaths are designed to direct people away from the woodland area. It is noted that the proposals for the Dodder Greenway (Part 8 running concurrently with this one) has included a measure to divert a footpath away from the rivers-edge close to the riparian woodland and to allow riparian woodland to naturally regenerate. This will strengthen an area of river edge that is currently eroded. The regenerated woodland may reduce existing level of access.

Submission no. 12 – Parkwood Residents Association - [..\Submissions\Postal parkwood residents.pdf](#)

This submission relates to the following issues:

1. Asking that the SDCC do not build a BMX track in Dodder Valley Park, the park is an unsuitable site for it, BMX tracks only work in walled/gated parks with structured opening & closing hours and full time rangers present.

Chief Executives Response and Recommendation:

1. **Noted. The BMX track will be built in accordance with the appropriate BMX design guidance; including the requirements for boundary protection. It is intended to licence the facility to a club who will manage it on behalf of SDCC.**

Submission no. 13 – BMX Ireland - [\Submissions\BMX Ireland - letter re Part 8.pdf](#)
BMX Ireland

1. BMX Track building is of vital importance to the growth of the sport.
2. BMX Ireland also operate a track certification program to ensure tracks are safe and meet the required standards of our sport. To this end BMX Ireland have worked since 2010 with South Dublin Council for the building of a BMX track and welcome the plan to put a facility in Mount Carmel Park.
3. To facilitate this BMX Ireland will continue to help the council plan and design for this track and BMX Ireland will establish and affiliate a local club to be run and maintained by local riders and parents.

Chief Executive Response and Recommendation:

1. **Noted**
2. **Noted**
3. **Noted**

5.0 County Development Plan 2016-2022

The County Development Plan 2016-2022 recognises the importance of sports facilities and is committed to ensuring that all communities have access to a range of such facilities. The Council will ensure that an appropriate range of sports facilities re provided in all communities, taking account of the population profile and growth targets.

It is the Policy of the Council to ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable
(Community Infrastructure (C) Policy 7-Sports Facilities and Centres)

C 7 Objective 1:

To support the provision of new or improved sports and leisure facilities in the County

C 7 Objective 3:

To support and provide a framework for the improvement, maintenance, upgrade and refurbishment of existing community based facilities within the county to meet current and future needs

C 7 Objective 4:

To encourage the co-location of community and sporting facilities.

C 7 Objective 7:

To support District Level Community Hubs in the Metropolitan Consolidation Towns of Tallaght, Lucan and Clondalkin to serve a growing population of these settlements and of the county as a whole, such hubs should incorporate a sports centre with swimming pool, all-weather playing pitches and children's play facilities.

Community infrastructure (C) Policy 12 Open Space states that:

It is the policy of the Council that a hierarchical network of high quality open space is available to those who live, work and visit the county, providing for both passive and active recreation, and that the resource offered by public open spaces, parks, and playing fields is maximised through effective management

C 12 Objective 3:

To develop parks and open/ green spaces that cater for the diverse needs of the County population, in particular different age groups and abilities, through the facilitation of both active and passive recreational activities and universal access.

Having regard to the nature and extent of the proposed project, it is considered that the proposed development is in accordance with the proper planning and sustainable development of the area and the County Development Plan 2016-2022.

6.0 Recommendation

Following consideration of the submissions the Chief Executive is of the view that the issues raised by way of the submissions can be satisfactorily addressed by the above proposals during the detailed design stage and as outlined in the foregoing report.

It is recommended that, as the proposal is in conformity with proper planning and sustainable development, that the Council proceed with the Part 8 proposal to develop and enhance a section of the existing parkland at Mt. Carmel Park, Dodder Valley, Firhouse.