**COMHAIRLE CONTAE ÁTHA CLIATH THEAS**

**SOUTH DUBLIN COUNTY COUNCIL**



**MEETING OF SOUTH DUBLIN COUNTY COUNCIL**

**Monday 23rd October 2017**

**Part 8 Report**

**DODDER GREENWAY ROUTE SCHEME WITHIN SOUTH DUBLIN COUNTY**

**INCLUDING PROPOSED BRIDGES AT ORWELL PARK AND BUSHY PARK, A PORTION OF WHICH ARE IN DUBLIN CITY COUNCIL LANDS.**

**Report on Part 8 consultation process for the above proposal.**

* The Greenway route is approximately 14km in length and passes along the Dodder Valley from Orwell / Terenure through the outer suburbs of Tallaght to rural and upland Dublin to the entrance to the Bohernabreena reservoirs at Glenasmole.

* It will provide for improved connectivity to communities, facilities and local business along the Dodder Valley corridor with a dedicated signage strategy.

* Where commuting currently exists and demand is anticipated to continue, the scheme either ensures it is facilitated in a pedestrian priority environment with additional capacity for safe use at junctions or provide an alternative route for commuting cyclists where required.

* The Greenway will generally consist of a shared 3-4m wide bound surface on the off road sections, tying into suitable bound surfacing for the on road sections. It is proposed to utilise enhanced variations to reflect local context.

* Works will include widening and upgrade to existing paths, construction of new paths, the construction of a number of new bridges, upgrade of existing bridges and underpasses, junction upgrades, etc.

* The upgrade and creation of new entrances to the Greenway.

* Improved landscape treatment to provide a coherent and legible Greenway along the proposed Greenway.

* Ecological enhancements including species rich grassland management, the planting of native trees and the provision of bat boxes.

* Bat friendly public lighting will be provided both in new areas and in upgrading sections of existing lighting.

CCTV will be provided at a number of locations including each of the bridges.

* Drainage measures including swales, signage, markings and ancillary works.

The proposed works primarily comprise the following:

**Bohernabreena to Old Bawn Road**

* Upgrade of existing entrances to proposed Greenway
* Improved environment for pedestrians and cyclists in a traffic calmed environment within Bohernabreena car parks
* Re-alignment of the entrance within the curtilage of Bohernabreena Reservoir a Protected Structure, Map Reference No.395
* Provision of traffic calming measures to cross the R114 into Kiltipper Park, at Ellensborough
* Utilise existing shared surface through Kiltipper Park
* Introduction of a new car park adjacent to Kiltipper Woods Care Centre. To minimise surface water runoff from this area the car park will be constructed using a geocell type product with gravel infill.
* Shared street on access road to Kiltipper Woods Care Centre
* Roundabout upgrade of existing roundabout on Kiltipper Way and Kiltipper Road junction
* Revise road cross section between Kiltipper Road roundabout to Kiltipper Woods Care Centre access road. Road width to be narrowed to 6m with 2m cycle track and 2m footpath.
* Revise road cross section between Kiltipper Woods Care Centre and Old Bawn Road. Road to be narrowed to 6m with provision of pedestrian facilities and traffic calming measures.
* Upgrade to existing public lighting where required.
* Incorporation of landscape plans and planting along Greenway to further detail

**Dodder Valley Park to M50 Underpass**

* Upgrade of existing entrances to proposed Greenway
* Widen existing paths to 3.5-4m where possible to create shared surface. Widen path at edge furthest from river.
* New 4m wide bridge over Dodder River at the Bolbrook Enterprise Centre and construct new 4m wide path to access road
* Link path to Mount Carmel Park and change estate road to shared street
* Upgrade junction geometry at Firhouse Road/Ballycullen Road junction
* Existing underpass under M50 motorway to be upgraded and re-graded
* Paths through parklands to include swales
* New public lighting directed away from river edge
* This section of the route passes through a pNHA (Proposed Natural Heritage Area)
* Incorporation of landscape plans and planting along Greenway to further detail

**M50 Underpass to Firhouse Road**

* Upgrade of existing entrances to proposed Greenway
* Widen existing paths to 3.5-4m where possible to create shared surface
* Create linkages to the Firhouse Road with upgrade of entrance and new toucan crossing of Firhouse Road
* Paths through parklands to include swales at certain locations
* New public lighting
* Realignment of existing paths at Spa link road underpass
* Extension of existing car park at Cherryfield
* Incorporation of landscape plans and planting along Greenway to further detail

**Firhouse Road to Kilvere**

Upgrade of existing entrances to proposed Greenway

* Reconfigure geometry of Firhouse Road/Old Bridge Road junction including removing the existing left slip lane off Old Bridge Road onto Butterfield Avenue
* Revise road cross section from Firhouse Road/Old Bridge Road junction to Kilvere. Road width to be narrowed to 6m with 2m cycle track and 2m footpath. On street parking to be removed along Butterfield Avenue.
* Shared street through Kilvere to Dodder Valley Park entrance
* Upgrade to existing public lighting where required.
* Upgrade of existing entrances to proposed greenway
* Upgrade of existing cycle and pedestrian facilities on Firhouse Road
* Incorporation of landscape plans and planting along Greenway to further detail

**Kilvere to Springfield Avenue**

* Upgrade of existing entrances to proposed Greenway
* Widen existing paths to 3.5-4m where possible to create shared surface
* New 4m wide bridge over Dodder River at Riverside Cottages, which is an Architectural Conservation Area, and construct 4m wide path linking to roadway and link to existing footpath to north of river, upgrading shared street from Riverside Cottages to Templeogue.
* Path to ramp up to Springfield Avenue to link with a shared surface and an alternative narrower path is to join in with the existing underpass.• Upgrade to existing public lighting where required • New public lighting within park area.
* Incorporation of landscape plans and planting along Greenway to further detail

**Springfield Avenue to Rathfarnham Road Junction**

* Upgrade of existing entrances to proposed Greenway
* Reduce carriageway width down to 6.5m and form a 4m wide shared surface along the northern side of the carriageway. The existing footpath, cycle track and shared surface along the southern side of the carriageway is to be retained.
* New paths and toucan crossing at Fairways junction.
* Upgrade existing car parking at Owendoher River.
* New 4m wide bridge over Dodder River at Bushy Park, the bridge is to connect directly into the Park north of existing wall where required. Provide path linkage from new path to existing paths along southern side the River.
* New car park opposite the bridge location, in open space adjacent to Springfield Avenue.
* New toucan crossing across Springfield Avenue
* New 4m wide shared path through green area at Woodview Cottages and shared street along on Church Lane to Rathfarnham Main Street.
* Upgrade to existing public lighting where required.
* Incorporation of landscape plans and planting along Greenway to further detail

**Rathfarnham Road Junction**

* Upgrade of existing entrances to proposed Greenway
* Revised junction geometry to improve pedestrian and cycle facilities
* Widen Springfield Avenue and Dodder Park Road approaches to the junction to facilitate the junction upgrade
* Upgrade to existing public lighting where required
* Incorporation of landscape plans and planting along Greenway to further detail

**Rathfarnham Road Junction to Orwell Park**

Upgrade of existing entrances to proposed Greenway

* Upgrade of shared street along Dodder Road Lower adjacent to park area at junction • Existing shared surface along the River to be maintained and upgraded as necessary
* New 4m wide bridge over Dodder River at Orwell Park.
* Upgrade of existing pathways to allow tie in to Orwell Park
* Upgrade to existing public lighting where required
* Incorporation of landscape plans and planting along Greenway to further detail

The proposed Greenway will be subject to a landscape plan, signage plan and ecological and environmental enhancements for the proposed greenway route. All ancillary works are included in the proposals.

An **Ecological Impact Assessment Report has been prepared** in respect of the proposed works.

The proposed Scheme has undergone **Appropriate Assessment Screening** under the Habitats Directive (92/43/EEC) and a determination has been made that a Stage 2 Appropriate Assessment will not be required.

The proposed Scheme has undergone **Environmental Impact Assessment Screening** under the EIA Directive 2014/52/EU and a determination has been made that an Environmental Impact Assessment will not be required.

# 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

Briefing to the internal relevant personnel South Dublin County Council (SDCC) the week of the 10th April 2017.

Briefing to the internal relevant personnel of Dublin City Council (DCC), and Dun Laoghaire Rathdown, in DCC offices on the 15th May 2017.

Presentation to the Dublin City South East Area Committee Meeting (ACM), City Hall 12th June 2017

Briefing to the Rathfarnham, Templeogue and Terenure, and the Tallaght Area Committee

Members, County Hall, Tallaght, 13th June 2017.

Briefing to the National Parks and Wildlife Services, NPWS Offices, Dublin, 9th May 2017.

Briefing to the Dundrum Area Committee, Dun Laoghaire-Rathdown County, 26th June 2017.

A number of individual presentations were held in County Hall, to interested groups as follows;

* Tallaght Community Council.
* Knocklyon Network.
* Partas Community Centre, Bolbrook.
* Dublin Mountain Partnership.
* Killtipper Care Nursing Home.
* Dodder Action Group.
* Thomas Davis GAA.

An information event was held in the County Library, Tallaght from 3pm – 6pm on Tuesday 15th August 2017 where Council staff were available to provide general guidance and answer queries relating to the proposed Dodder Greenway.

During the Part 8 process South Dublin County Council staff attended the public counter at County Hall, Tallaght to answer queries and advise regarding the Part 8 submission process.

This non-statutory consultation raised awareness in the local community regarding the Part 8 and provided an opportunity for queries prior to completion of the public consultation period of the Part 8 process.

1.3.2 Statutory Consultation

The Part 8 proposals were presented at a meeting with locally elected members prior to commencement of Part 8 with a presentation to the Dublin City South East Area Committee Meeting (ACM), City Hall on the 12th June 2017 and to the Rathfarnham, Terenure, Templeogue Area Committee Members and Tallaght Area Committee members on the 13th June 2017.

The proposed development and accompanying Appropriate Assessment report were placed on public display for the statutory period from Thursday 22nd of June to Friday 18th of August 2017.

The closing date for receipt of written submissions was up to 4.00pm on Friday the 18th of

August 2017 and were to be addressed in writing to: Senior Executive Officer, Forward Planning Section, Land Use, Planning and Transportation, County Hall, Tallaght, Dublin 24 or via South Dublin’s on-line consultation portal: http://consult.sdublincoco.ie

Copies of the plans and particulars of the proposed scheme proposed scheme were available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy from **Thursday 22nd of June to Friday 18th of August at the following locations:**

* **Dublin City Council Offices, Wood Quay, Dublin 8** between the hours of 9:00 am – 5.00pm Monday to Friday **(Inspection and Purchase)**
* **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 only)** between the hours of 9:00am – 4.00pm Monday to Thursday and 9.00am - 3.30pm on Friday **(Inspection and Purchase)**

* **County Library, Tallaght, Dublin 24,** between the hours of 9.45 am to 8 pm **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 hoursof 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)**

# Submissions

Submissions and observations on the Part 8 Proposed Dodder Greenway Route could be made online and in writing to the addresses below between Thursday 22nd of June to Friday 18th of August inclusive (excluding Public Holidays) as follows;

## • Online: at https://consult.sdublincoco.ie

• By Post: In writing to the Senior Executive Officer, Forward Planning Section, Land Use, Planning and Transportation, County Hall, Tallaght, Dublin 24.

A total of 49 submissions were received by the closing date for public consultation.

**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—

1. 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,
2. 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.
3. list the persons or bodies who made submissions or observations with respect to the proposed development in accordance with the regulations under subsection (2),
4. 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 a Greenway route approximately 14km in length and passes along the Dodder Valley from Orwell / Terenure through the outer suburbs of Tallaght to rural and upland Dublin to the entrance to the Bohernabreena reservoirs at Glenasmole.

The proposed works primarily comprises the following:

* It will provide for improved connectivity to communities, facilities and local business along the Dodder Valley corridor with a dedicated signage strategy.

* Where commuting currently exists and demand is anticipated to continue, the scheme either ensures it is facilitated in a pedestrian priority environment with additional capacity for safe use at junctions or provide an alternative route for commuting cyclists where required.

* The Greenway will generally consist of a shared 3-4m wide bound surface on the off road sections, tying into suitable bound surfacing for the on road sections. It is proposed to utilise enhanced variations to reflect local context.

* Works will include widening and upgrade to existing paths, construction of new paths, the construction of a number of new bridges, upgrade of existing bridges and underpasses, junction upgrades, etc.

* The upgrade and creation of new entrances to the Greenway.

* Improved landscape treatment to provide a coherent and legible Greenway along the proposed Greenway.

* Ecological enhancements including species rich grassland management, the planting of native trees and the provision of bat boxes.

* Bat friendly public lighting will be provided both in new areas and in upgrading sections of existing lighting.

* CCTV will be provided at a number of locations including each of the bridges.

* Drainage measures including swales, signage, markings and ancillary works.

**2.2 Plans and Details**

Plans and details are available at the following link:

## https://consult.sdublincoco.ie/en/consultation/dodder-greenway-route-scheme

### **3. List of Submissions**

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

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| DGR0001 | Ger Ryan-(Via Consultation Portal Ref: CVQ-288) |
| DGR0002 | James Cashin-(Via Consultation Portal Ref: CVQ-299) |
| DGR0003 | Gerard Stockil-(Via Consultation Portal Ref: CVQ- 320) |
| DGR0004 | Mary Costello-(Via Consultation Portal Ref: CVQ- 353) |
| DGR0005 | Miriam Faure-(Via Consultation Portal Ref: CVQ- 354) |
| DGR0006 | Mary Coughlan-(Via Consultation Portal Ref: CVQ- 355) |
| DGR0007 | Lydia and Patrick Mc Laughlin-(Via Consultation Portal Ref: CVQ- 357) |

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| DGR0008 | Peter Byrne-(Via Consultation Portal Ref: CVQ- 359) | |
| DGR0009 | Eugene Barrett-(Via Consultation Portal Ref: CVQ- 362) | |
| DGR00010 | Gretta Hannigan-(Via Consultation Portal Ref: CVQ- 363) | |
| DGR00011 | Muireann O’Dea-(Via Consultation Portal Ref: CVQ- 364) | |
| DGR00012 | Cllr Deirdre O’Donovan-(Via Consultation Portal Ref: CVQ- 365) | |
| DGR00013 | Niamh O’Reilly -(Via Consultation Portal Ref: CVQ- 366) | |
| DGR00014 | Helen Flynn-(Via Consultation Portal Ref: CVQ- 367) | |
| DGR00015 | Caragh Coote-(Via Consultation Portal Ref: CVQ- 368) | |
| DGR00016 | Ray Donnellan-(Via Consultation Portal Ref: CVQ- 371) | |
| DGR00017 | Elizebeth Dobbs-(Via Consultation Portal Ref: CVQ- 369) | |
| DGR00018 | Keith Scanlon-(Via Consultation Portal Ref: CVQ- 380) | |
| DGR00019 | Andrew Parkes-(Via Consultation Portal Ref: CVQ- 382) | |
| DGR00020 | John Hickey / Brendan Mc Donald -(Via Consultation Portal Ref: CVQ- 383) | |
| DGR00021 | Michael O’Boyle -(Via Consultation Portal Ref: CVQ- 384) | |
| DGR00022 | NPWS-(Via Consultation Portal Ref: CVQ- 385) | |
| DGR00023 | David Cotter-(Via Consultation Portal Ref: CVQ- 387) | |
| DGR00024 | Eric Conroy-(Via Consultation Portal Ref: CVQ- 388) | |
| DGR00025 | Helena Nicholson Hughes-(Via Consultation Portal Ref: CVQ- 389) | |
| DGR00026 | David Kennedy (Thomas Davies Development Officer / DV Land Owners) (Via Consultation Portal Ref: CVQ- 390) | |
| DGR00027 | Mary Dobbs -(Via Consultation Portal Ref: CVQ- 391) | |
| DGR00028 | Michael Sheedy-(Via Consultation Portal Ref: CVQ- 393) | |
| DGR00029 | Yvonne Jackson / Mary Stack-(Via Consultation Portal Ref: CVQ- 394) | |
| DGR00029A | Yvonne Jackson / Mary Stack-(supplementary to DRG00029 received By Post) | |
| DGR00030 | Joanne Gillen-(Via Consultation Portal Ref: CVQ- 395) | |
| DGR00031 | Cllr Dermot Looney-(Via Consultation Portal Ref: CVQ- 396) | |
| DGR00032 | Keith Scanlon-(Via Consultation Portal Ref: CVQ- 397) | |
| DGR00033 | Dermot Mc Dermot-(Via Consultation Portal Ref: CVQ- 399) |
| DGR00034 | John Clinch (BGPG) -(Via Consultation Portal Ref: CVQ- 400) |
| DGR00035 | Eamon O’Neil-(Via Consultation Portal Ref: CVQ- 401) |
| DGR00036 | Thomas O’Neil-(Via Consultation Portal Ref: CVQ- 402) |
| DGR00037 | Gregory R Devlin-(By Post) |
| DGR00038 | Elaine Edmonds TII-(By Post) |
| DGR00039 | Denise Delappe (Parkway RA)-(By Post) |
| DGR00040 | Tony O’Reilly (Residents of Kilvere)-(By Post) |
| DGR00041 | Marie Gilligan-(By Post) |
| DGR00042 | Helen Flynn-(By Post) |
| DGR00043 | Niall Morton (Mortons Pub)-(By Post) |
| DGR00044 | Paddy Marron (Rathgar RA)-(By Post) |
| DGR00045 | Dominic Finnegan (Thomas Davis GAA)-(By Post) |
| DGR00046 | Redmond O’Hanlon (Dodder Anglers Association)-(By Post) |
| DGR00047 | John Stanton (Dodder Valley Association)-(By Post) |
| DGR00048 | Victoria White (Dodder Action)-(By Post) |
| DGR00048a | Victoria White (Dodder Action)-(Supplementary to DR00048 By Post) |
| DGR00049 | Cllr Paula Donovan-(By Post) |

### **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 –Ger Ryan

This submission relate to the following issues:

1. Testing the consultation portal to see how it works.

**Chief Executives Response and Recommendation:**

1. Noted.

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| **Submission No.2 – James Cashin**  This submission relates to the following issues:   1. Request that consideration is given to implementing a reduction in the speed limit from the current 50kph limit along Springfield Avenue.   Noted. This will be considered as part of the detailed design stage. It is intended that the speed limit along Springfield Avenue be reduced to 50kph to coincide with the reduction in the carriageway width.     1. Request that consideration is given to the provision of solar powered radar speed indicator outbound and provision of warning signs ahead of the parking facilities along Springfield Avenue   Noted. Will be considered as part of the detailed design stage. The carriageway will be signposted in accordance with TII and DMURS recommendations     1. Submission queries whether the proposed Bushy Park Masterplan has been superseded by the proposed new car park detailed on drawing 13\_102\_00\_2219-C   The Bushy Park Masterplan by DCC proposed 2 areas of car parking; one at Rathdown Avenue; which is unaffected by the current Part 8 proposals, and the second at the northern side of Springfield Avenue.  There were a number of other proposals relating to the southern portion of Bushy Park within the Bushy Park Masterplan, (as one of the key findings of the masterplan process was the lack of access at the southern section of the park) as follows:     * New car park proposed for southern bank of River Dodder * New bridge proposed over River Dodder into the park * 4m wide – wheel chair accessible, pedestrian and cycle path from the southern to northern boundary of the park * Sections of the existing Dodder wall punctuated and replaced by ornamental railing to improve passive surveillance and biodiversity in woodland & river corridor * New access gate into park at the northern end of the existing footbridge     The Dodder Greenway specifically had to consider new bridge crossings of the Dodder. The proposed bridge at Bushy Park had to consider a number of design parameters and constraints; some of which are listed as follows: limit impact on Bushy Park and the existing ecology, limit impact on the Bushy Park riverside wall, reduce impact on existing vegetation, tie into footpaths within the park, provide access to the park, incorporate universal access in the design (existing bridge lacks universal accessibility), accommodate the requirements of the CFRAMS study which manages flood risk. The design of the bridge had to be carefully designed to ensure it merged with the surrounding landscape and included a careful choice of materials such as stone walling to replicate local details. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The bridges will all therefore be associated with a coherent Dodder Greenway scheme; albeit some local variation may be incorporated as is the case at Bushy Park.    Importantly the River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010. |

So by careful process of elimination and design the current proposed position for the bridge best married all of the above requirements. This to some extent dictated the position of the proposed parking; though it too had to be considered under its own parameters and constraints some of which are listed above. It is the considered opinion of the Chief Executive that the car parking and the bridge, which provides the universal access to the south of Bushy Park without compromising flood risk, as proposed, is the best location for both bridge and car park. It is also the case that the proposals for both bridge and car park achieve a number of the objectives for the Bushy Park Masterplan. The Parks and Landscape Services Department of DCC were consulted at both the feasibility and preliminary stages of the current Part 8 process. It is the intention of SDCC to continue to liaise with them during the detailed design stage; should the Part 8 be passed.

1. Graffiti is a persistent problem with existing underpasses & structures along the route. It is presumed that CCTV can be used as a deterrent. It is requested that existing graffiti be removed and that adequate deterrents are put in place to avoid re-occurrences.

Noted. CCTV will be provided at designated locations along the route. Existing Graffiti can be addressed during construction phases. The maintenance of the Greenway will be of high importance to the successful delivery and operation of the Dodder Greenway. An operational and maintenance strategy will be prepared to ensure successful delivery in this regard.

1. Along Springfield Avenue in the green areas, existing mature trees and bushes provide privacy and security for the rear of the Fairways properties it would be desirable to maintain this situation.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 3 – Gerard Stockil Tallaght Community Council et al.**  **(Incorporating Chief Executives Response and Recommendation):**  This submission relates to the following issues:    **Bohernabreena Reservoir**     1. Request for a detailed plan for the proposed bridge structure at Fort Bridge Noted and will be considered as part of the detailed design stage.      1. Request for a stone wall construction as part of new boundary proposals at Car Park entrance to Bohernabreena Reservoir.   Noted and will be considered as part of the detailed design stage. |
| **Kiltipper Park**     1. Welcomes proposed tree planting along proposed greenway route within Kiltipper Park and would request bulb planting along this area as part of the final plan.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage     1. Request that a moderate amount of public lighting be installed in this area as there is a large population near this area who would feel safer if the area was lit. |

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| It is not proposed to install public lighting along the Greenway route within Kiltipper Park. The final lighting plan for the overall route will be designed at detailed design stage, in accordance with the Lighting Code presented in the EcIA (Sections 5.5.4 and 7.4.9) and will be agreed with the NPWS. |
| 1. Request that a stone cladded wall be provided as a more appropriate boundary treatment at the proposed Car Park in Ellensborough in lieu of the palisade fencing. Noted and will be considered as part of the detailed design stage.      1. Request a CCTV and lighting within the Car Park to ensure high security levels for residents & the nursing home.   Noted and will be considered as part of the detailed design stage.     1. Request an automated access gate for the Car Park, as in Tymon and Sean Walsh, should to avoid any overnight parking with opening times of 7 am and closing at 10 pm to ensure maximum parking times for walking, park access or visiting at the nursing home. Noted and will be considered as part of the detailed design stage.      1. Request that car park should be kept to 15 spaces maximum to avoid attracting camper vans and larger commercial vehicles, while well serving walker’s needs. Noted and will be considered as part of the detailed design stage.      1. Queries why a more durable surface treatment within the proposed car park is not considered appropriate i.e. tarmac?   Current proposal provides a more sustainable drainage solution; allowing for infiltration and decreasing run-off. However the detail of the surfacing will be further considered at the detailed design stage for the Dodder Greenway.    10 Request that the landscape plan is prepared for roundabout at Kiltipper Way and Kiltipper Road that is equal in scale, ambition and visual impact as that proposed for the Firhouse Road junction interchange and the Rathfarnham bridge cross roads further East in this scheme to highlight its importance as a key intersection with the Dublin Mountain Way route. Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.    **Kiltipper Road**    11. Request that any stone walling or hedgerow removed as part of the proposed works along Kiltipper Road is replaced to maintain the integrity of this rural road and the boundaries, which is core to the heritage of Tallaght and this area.  Noted. Removal of stone walls and hedgerows will be minimised in the interest of retaining heritage and biodiversity value. Reinstatement will be considered as part of an overall Landscape at the detailed design stage.     1. Request confirmation that the installation of formal car parking bays along Kiltipper Rd has been discussed directly with the homeowners impacted.   Noted. A number of residents have made submissions to the public consultation process as appropriate. A number of landowners have also discussed proposals with SDCC during the Part 8 process. Issues raised will be considered and addressed with the residents during the detailed design stage     1. Request confirmation that mature trees (5-7 years old) will be used within proposed landscaping along Kiltipper Rd and that they will be planted during the planting season. Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     14. Request for viewing point at appropriate location along Kiltipper Rd. |

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| Noted and will be considered as part of the detailed design stage.    **Riverview**   1. Request that the sparse hedgerow near the North side by Riverview houses be supplemented with more hedgerow   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request consideration of whether a toucan crossing in this location will exacerbate car congestion in the area or not.   Misunderstanding within submission that toucan crossings are ‘always on’ for pedestrians. This may be considered at the detailed design stage. However, as proposed, Toucan crossing are crossings that can be used by both pedestrians and cyclists; they are typically wider than standard pedestrian crossings to allow both pedestrians and cyclists to use them and include an additional signal head for cyclist. The proposals along the Old Bawn Road were substantially formed as part of a previously passed Part 8 for a cycle scheme from Tallaght to Templeroan. The proposals within this Part 8 for that area amend same slightly in order to ensure pedestrians are also accommodated. The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for this section of the route and for the junctions.     1. Request consideration of turning all six pedestrian crossings into Toucan crossing will adversely affect traffic flow, and request considerations of alternative actions   Misunderstanding within submission that toucan crossings are ‘always on’ for pedestrians. This may be considered at the detailed design stage. However, as proposed, Toucan crossing are crossings that can be used by both pedestrians and cyclists; they are typically wider than standard pedestrian crossings to allow both pedestrians and cyclists to use them and include an additional signal head for cyclist. The proposals along the Old Bawn Road were substantially formed as part of a previously passed Part 8 for a cycle scheme from Tallaght to Templeroan. The proposals within this Part 8 for that area amend same slightly in order to ensure pedestrians are also accommodated. The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for this section of the route and for the junctions.     1. Request that manually operated pedestrian crossings be kept intact and ask that toucan crossing be rejected at these locations.   Misunderstanding within submission that toucan crossings are ‘always on’ for pedestrians. This may be considered at the detailed design stage. However, as proposed, Toucan crossing are crossings that can be used by both pedestrians and cyclists; they are typically wider than standard pedestrian crossings to allow both pedestrians and cyclists to use them and include an additional signal head for cyclist. The proposals along the Old Bawn Road were substantially formed as part of a previously passed Part 8 for a cycle scheme from Tallaght to Templeroan. The proposals within this Part 8 for that area amend same slightly in order to ensure pedestrians are also accommodated. The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for this section of the route and for the junctions.     1. Request no change to the kiss gate system, and do not want a third gate.   Noted. It is intended that all entrances to the Greenway, both existing and proposed will be upgraded to be universal accessible for all legitimate users of the Greenway. It is noted that kissing gates are seldom successful in precluding access by motorbikes and other motorised users. These users tend not to be deterred by kissing gates and often go to extreme ends to gain access to parks and open space. It has also been established that kissing gates can exclude legitimate users such as some cyclists, buggies and some wheelchair users.    Prevention of illegal access will be further considered at the detailed design stage; however it has been the experience in the past that the removal of kissing gates, in tandem with the |

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| provision of improved facilities and other measures, and the increased use by legitimate pedestrian and cycle users can often discourage and remove existing illegal use by motorised vehicles.     1. Request a solution to the long established problem of illegal scrambler bike access to the park   Noted. Scrambler access to parks are an on-going problem that the Council and are dealt with under a variety of measures. The Council is a signatory of the Barcelona Declaration that seeks universal accessibility to its facilities. The effort to exclude access by illegal motorised vehicles to Council parks has to be carefully balanced not to also exclude access by those who have a right and a wish to gain access to public facilities. The Council liaise with the Gardaí in this regard.     1. Request consideration be given to the Part 8 approved sports pavilion in this area and that budgets are not duplicated.   Noted. Liaison has occurred between design teams in the Council and will continue to do so.     1. Request parity of esteem and balance of investment on both sides of the Dodder Bank and that there is no disparity between the quality of finish and standard of materials used from East to West along the Dodder and that this be accessed regularly and be a key design principle.   The proposed Dodder Greenway route is based on the consideration of a variety of factors and informed by a number of constraints. The design of the Greenway is intended to be mainly consistent along its length, (to aid in way-finding, branding, etc.); albeit informed by local factors such as biodiversity, soil type, local heritage etc. which will also ensure variety and local interest. The proposed investment is for the development of the Dodder Greenway along the length of the Dodder Valley. The proposed enhancement of links to and from the Greenway will encourage use of the Greenway, allow access to local facilities and support local enterprise.    22 Request that there is a tree planting along pathways, in the Seskinview and Bawnville area and on the North side of the Dodder, approx. 30- 50 trees, but not obscuring the waterfall or mountain views to ensure balance in the tree planting efforts and investments.  Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.     1. Request that a Tree Tail be developed in Dodder Park and that it be linked to the one proposed in Mount Carmel Park Pt 8.   Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.    **Seskin View / Bawnville**   1. Request that the unique Dodder Valley Park be enhanced by the provision of a coffee shop as an amenity to locals and cyclists just as a coffee shop is planned for Bushy parks to enhance the area.   Noted. Request is outside the scope of the current Part 8 for the Dodder Greenway; however the presence of a Greenway in future years could support such a facility.     1. Request speeding up the delivery of the approved Old Bawn Pavillion, and ask for a finish date to be published.   Noted. This is outside the scope of the current Part 8 for the Dodder Greenway.     1. Request future consideration of an “Irish Camino” focused on the old monastic site in Tallaght which is also the county town.   Noted.   1. Request mulching near the grassed slopes of the visual amenity at Old Bawn Bridge to preserve its visual amenity. |

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| Grassland on northern slopes of Dodder close to Old Bawn bridge has a maintenance regime designed to support its species. Mulching would not be recommended as it would add nitrates to a meadow which requires low competition from vigorous grass species. In relation to sight lines the public realm section have recently removed a number of self-seeded trees to open up sight lines and retain the rich meadow land at this location.     1. Request that to signpost, value and celebrate the excellent viewing opportunities at this point on the greenway, we propose a landscaped viewing point is created on the existing pathway, To signpost, value and celebrate the excellent viewing opportunities at this point on the greenway, we propose a viewing point is created on the existing pathway, marked by ornate planting, bulb planting and a stone plaque (as is proposed for the section by the Riverside cottages further East)   Noted and will be considered as part of an overall Signage and Wayfinding strategy plan at the detailed design stage.    **Firhouse Rd**   1. Request tree planting on the North bank of the Dodder.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage    **Bolbrook**   1. Request that pathways remain close to the water.   The Greenway has been designed to use existing paths where possible.  Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes. Due to a variety of constraints at that location; the current proposed route is the most feasible one. These constraints included available space, flood risk, wildlife, habitats protected under the EU Habitats Directive among other considerations and meant that the Greenway was required to deviate from the riverside at some locations. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. Existing paths along the river will continue to provide access along to the riverbank as outlined in the plans.    31 Request additional landscaping at the Whitetown Stream/Dodder river confluence, which can be a local meeting of the waters, and the highest quality stone and bridge material similar to that used further east along the river  Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request an ornamental landscape plan for the triangular site, behind Partas, to be enjoyed from the bridge and to inject colour through bulb planting for Springtime colour Noted and will be considered as part of an overall Landscape plan at the detailed design stage.      1. Request fishing spots marked by stone plaques in this area   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request that the Greenway entrance has the same boundary treatment, and quality of materials as the entrances proposed further east at Knocklyon, Templeogue and Rathfarnham, and that it use granite and has lighting features. |

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| Noted and will be considered as part of an overall Landscape plan at the detailed design stage.   1. Request a meadow walk as detailed by the yellow line in the map and for the removal of view-obscuring self-seeded poplar trees.   The area is an undeveloped woodland that provides refuge for protected species including badger and otter. Development of a walkway in this area would displace these species that already have limited areas to shelter within the Dodder corridor.     1. Request the removal of view-obscuring self-seeded poplar trees.   The area is an undeveloped woodland that provides refuge for protected species including badger and otter. Development of a walkway in this area would displace these species that already have limited areas to shelter within the Dodder corridor.     1. Request a formal Greenway entrance on Map 2215, this entrance should use high quality materials and be of the same standard of finish as elsewhere, and we repeat of call for equal standards for all entrance points along the Dodder   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request, there should also be signage to the Tallaght – Ballyboden cycle track by way of a stone way-marker – to take a design cue from the Mill which stood on this site.   Noted and will be considered as part of an overall Signage and Wayfinding strategy plan at the detailed design stage. |
| 1. Request that the standard of this entrance be upgraded to match that of other entrances Noted and will be considered as part of an overall Landscape plan at the detailed design stage.      1. Request a stone plaque to commemorate the location of Bolbrook Mill.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request that the low wall on both sides of the Partas entrance be replaced by a winged granite wall.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request a completed formal boundary of high quality along the Seskin View Road/Homelawn entrance. Noted and will be considered as part of an overall Landscape plan at the detailed design stage     **Balrothery**   1. Request a viewing point for the North bank beside Balothery Weir as part of equal treatment of the North bank and the South Bank. A simple thinning of the low grade gorse and scrub would create this viewing window.   The area on the north side of the river beside Balrothery Weir is an undeveloped woodland that provides refuge for protected species including badger and otter. Development of a walkway in this area would displace these species that already have limited areas to shelter within the Dodder corridor.     1. Request the pathway / cycle connector route by Kilsaran to be upgraded.   Noted. A link from the Greenway at Balrothery Weir to the Tallaght to Templeogue Cycle Route will be included at the detailed design stage, subject to ecological and environmental considerations.     1. Request a historic sign (stone plaque) with a granite key work,that reference the City Watercourse at Balrothery Weir. |

Noted and will be considered as part of an overall Landscape plan at the detailed design stage.

1. Request more information of what the hydroelectric plant near the Balrothery Weir is, and note our objection to any industrial system that is out of character with the history of the weir? Any proposal to develop a hydro-electric station on the Dodder should be the subject of a separate Part 8 process.

Noted. A very early stage feasibility study was carried out county wide with regard to the possibility of such facilities. Should that project proceed and deemed viable it may be incorporated into the detailed design stage for the Dodder Greenway Part 8.

1. Request the trees on the north bank between the M50 slip road and the Weir are pruned back & thinned out to open up the full width of the weir as a view to the passing cars. What an amazing “Welcome to Tallaght & the County Town” that would be.

The area is an undeveloped woodland that provides refuge for protected species including badger and otter. Development of a walkway in this area would displace these species that already have limited areas to shelter within the Dodder corridor.

1. Request a Common Signage and Branding strategy is prepared for the Dodder Greenway Route to include unique route symbol & brand – sensitive viewing point markers, as has been done for the Wild Atlantic Way.

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 4 – Mary Costello (Cherryfield Dog Walkers)

This submission relates to the following issues:

1. Concerns raised with regards to the ability to use the greenway for Dog Walking. No accommodation has been given to the regular dog walkers that use the park currently many of whom walk their dogs “off leash”. The proposed Dodder Greenway does not provide an improved environment for all pedestrians - specifically the significant dog walking pedestrians will be adversely affected. Request accommodation of dog walkers within the scheme as they are already a well-established group of users with the area to include provision of approved off leash dog walking facility.

The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment.

Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within

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| the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.    Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.    http://www.sdcc.ie/services/environmental-health/animal-control/dogs     1. Greenway goes through a seat “Cormacs seat” restored and maintained by the Cherryfield Dog Walkers association, in memory of one of their own dog walkers who has passed away. Noted and will be included/considered as part of an overall Landscape plan at the detailed design stage      1. Questions the need for the Greenway as recently constructed cycleway already exists along Firhouse road adjacent to the Cherryfield Dodder Park section and raises concerns raised with regards to high speed cyclists using the Dodder Greenway and the potential conflicts with pedestrians and dog walkers.     Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The following is definition of a Greenway.    “Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.  (Lille Declaration, European Greenways Association, 12th September 2000).”    The detailed design stage will further examine ways to mitigate against excessive speeds and will examine the use of such initiatives such as pedestrian and cycle counters and speed monitors at critical locations. Should the greenway be subject to excessive cycle commuting pressures the provision of additional alternative routes will be considered. It should be noted that within South Dublin County council there has been a programme of cycle network delivery, which has delivered cycle routes over a number of years. This programme is ongoing and primarily aimed at facilitating commuters and other cyclists. The Greenway may accommodate commuting in a low speed, park land environment but will be designed to ensure it will not be dominated by it.     1. Welcomes the initiative to include Bat friendly lighting along the route. Noted.      1. Request for bin/waste facilities for dog poo. Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.      1. Welcomes to initiative to include CCTV at a number of locations along the route. Noted.      1. Request that any proposed Landscape is cognisant of the existing biodiversity and does not adversely affect the current biodiversity.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage. |

**Chief Executives Response and Recommendation:**

1 Submission noted.

2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 5 – Miriam Faure

This submission relates to the following issues:

1. Request the provision of Basketball courts within the Dodder area be considered as part of the overall plans for the area.

Noted and will be considered as part of the detailed design stage

1. Concerns raised with regards to the ability to use the Dodder Greenway for Dog Walking as is there are presently many dog walkers using the area.

The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment.

Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.

Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.

### http://www.sdcc.ie/services/environmental-health/animal-control/dogs

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 6 – Mary Coughlan

This submission relates to the following issues:

1. Concerns raised with regards to the ability to use the greenway for Dog Walking. No accommodation has been given to the regular dog walkers that use the park currently many of whom walk their dogs “off leash”. The proposed Dodder Greenway does not provide an improved environment for all pedestrians - specifically the significant dog walking pedestrians will be adversely affected. Request accommodation of dog walkers within the scheme as they are already a well-established group of users with the area to include provision of approved off leash dog walking facility.

The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment.

Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.

Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.

### http://www.sdcc.ie/services/environmental-health/animal-control/dogs

1. Greenway goes through a seat “Cormacs seat” restored and maintained by the Cherryfield Dog Walkers association, in memory of one of their own dog walkers who has passed away. Noted and will be included/considered as part of an overall Landscape plan at the detailed design stage

1. Questions the need for the Greenway as recently constructed cycleway already exists along Firhouse road adjacent to the Cherryfield Dodder Park section and raises concerns raised with regards to high speed cyclists using the Dodder Greenway and the potential conflicts with pedestrians and dog walkers.

Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The following is definition of a Greenway.

“Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.

(Lille Declaration, European Greenways Association, 12th September 2000).”

The detailed design stage will further examine ways to mitigate against excessive speeds and will examine the use of such initiatives such as pedestrian and cycle counters and speed monitors at critical locations. Should the greenway be subject to excessive cycle commuting pressures the provision of additional alternative routes will be considered. It should be noted that within South Dublin County council there has been a programme of cycle network delivery, which has delivered cycle routes over a number of years. This programme is ongoing and primarily aimed at facilitating commuters and other cyclists. The Greenway may accommodate commuting in a low speed, park land environment but will be designed to ensure it will not be dominated by it.

1. Welcomes the initiative to include Bat friendly lighting along the route. Noted.

1. Request for bin/waste facilities for dog poo. Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste,

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| including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.     1. Welcomes to initiative to include CCTV at a number of locations along the route. Noted.      1. Request that any proposed Landscape is cognisant of the existing biodiversity and does not adversely affect the current biodiversity.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 7 – Lydia and Patrick McLoughlin

This submission relates to the following issues:

1. Concerns raised with regards to the ability to use the greenway for Dog Walking. No accommodation has been given to the regular dog walkers that use the park currently many of whom walk their dogs “off leash”. The proposed Dodder Greenway does not provide an improved environment for all pedestrians - specifically the significant dog walking pedestrians will be adversely affected. Request accommodation of dog walkers within the scheme as they are already a well-established group of users with the area to include provision of approved off leash dog walking facility.

The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment.

Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.

Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.

### http://www.sdcc.ie/services/environmental-health/animal-control/dogs

1. Greenway goes through a seat “Cormacs seat” restored and maintained by the Cherryfield Dog Walkers association, in memory of one of their own dog walkers who has passed away. Noted and will be included/considered as part of an overall Landscape plan at the detailed design stage

1. Questions the need for the Greenway as recently constructed cycleway already exists along Firhouse road adjacent to the Cherryfield Dodder Park section and raises concerns raised with

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| regards to high speed cyclists using the Dodder Greenway and the potential conflicts with pedestrians and dog walkers.  Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The following is definition of a Greenway.    “Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.  (Lille Declaration, European Greenways Association, 12th September 2000).”    The detailed design stage will further examine ways to mitigate against excessive speeds and will examine the use of such initiatives such as pedestrian and cycle counters and speed monitors at critical locations. Should the greenway be subject to excessive cycle commuting pressures the provision of additional alternative routes will be considered. It should be noted that within South Dublin County council there has been a programme of cycle network delivery, which has delivered cycle routes over a number of years. This programme is ongoing and primarily aimed at facilitating commuters and other cyclists. The Greenway may accommodate commuting in a low speed, park land environment but will be designed to ensure it will not be dominated by it.     1. Welcomes the initiative to include Bat friendly lighting along the route. Noted.      1. Request for bin/waste facilities for dog poo. Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.      1. Welcomes to initiative to include CCTV at a number of locations along the route. Noted.      1. Request that any proposed Landscape is cognisant of the existing biodiversity and does not adversely affect the current biodiversity.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 8 – Peter Byrne

This submission relates to the following issues:

1. Concerns have been raised in regards to the lack of parking in front of Glenville Lodge and the other cottages along Kiltipper Road. This results in difficulties with putting bins out, deliveries to the dwellings, domestic building works etc.

One additional parking space will be provided directly in front of the cottages therefore providing five car parking spaces in total. These parking spaces cannot be dedicated to the cottages as they will be in a public space. There is insufficient space to provide any additional road side parking spaces in this area. Six road side car parking spaces have been provided further west along Kiltipper Road. Noted. A number of residents have made submissions to the public consultation process as appropriate. A number of landowners have also discussed proposals with SDCC during the Part 8 process. Issues raised will be considered and addressed with the residents during the detailed design stage

1. Concerns regarding the existing road conditions have been raised such as lack of drainage, speeding of traffic, volumes/heavily trafficked, inadequate lighting, traffic management and parking at the adjoining football pitches.

The new road construction will be to current standards and will provide much improved drainage, signage, lighting, traffic calming measures and kerb edging. Traffic and parking management of the adjoining football pitches should be addressed with the management of the pitches.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 9 – Eugene Barrett (Knocklyon Network)

This submission relates to the following issues:

1. The Greenway diverges from the natural route of the river and onto roads too often The Greenway has been designed to use existing paths where possible. Other considerations including available space, flood risk, wildlife, habitats protected under the EU Habitats Directive meant that the Greenway was required to deviate from the riverside. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank. The following outlines the reasons for on-road travel of each section listed in the submission. Kiltipper- the lands adjacent to the river are privately owned and contain Annex I habitat (Tufa forming springs and Alluvial Woodland). Knocklyon Road to Kilvere - Much of the lands adjacent to the river are privately owned. The public land within the meander contains protected wildlife shelters and are subject to regular flooding. Springfield Avenue - The existing segregated cycle lanes on Springfield Avenue are being upgraded as part of the greenway. Existing paths along the river in this section will continue to provide access along to the riverbank.

1. Consider options for creative solutions for lighting the Greenway to accommodate wildlife should be found to allow the Greenway to travel along the river.

The Greenway deviates from the river’s course for a variety of reasons including ecological sensitivities. Lighting has been shown to have negative impacts of bats and for that reason a Lighting Code has been prepared which will be further developed at Detailed Design stage to ensure that Greenway has a neutral to positive impact on biodiversity.

1. The swales should be used to generate ponds and water features.

Noted. The swales are intended as a low impact surface water drainage mechanism that also can incorporate ecological benefits. Where appropriate this concept could be expanded to include ponds and water features. This will be determined on a case by case basis at the detailed design stage as part of the landscape and drainage plans; taking into account the existing environmental condition.

1. The primary route of the Greenway should be closest to the River Dodder.

The Greenway has been designed to use existing paths where possible. Other considerations including available space, flood risk, wildlife, habitats protected under the EU Habitats Directive meant that the Greenway was required to deviate from the riverside. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank. The following outlines the reasons for on-road travel of each section listed in the submission. Kiltipper- the lands adjacent to the river are privately owned and contain Annex I habitat (Tufa forming springs and Alluvial Woodland). Knocklyon Road to Kilvere - Much of the lands adjacent to the river are privately owned. The public land within the meander contains protected wildlife shelters and are subject to regular flooding. Springfield Avenue - The existing segregated cycle lanes on Springfield Avenue are being upgraded as part of the greenway. Existing paths along the river in this section will continue to provide access along to the riverbank

1. Two bridges proposed in the development plan have been deleted in this application.

There are no bridges proposed within the current Development plan crossing the Dodder Valley within the environs of the proposed Dodder Greenway route. These 2no. bridges were included in the July 2015 Draft Development Plan but were removed at material alteration stage as part of the final adopted Development Plan June 2016.

1. The greenway should be accessible from all parts of Knocklyon and Firhouse.

Noted. The Greenway is proposed to be universally accessible. Further enhancements to increase accessibility to the route by interventions, including within the Knocklyon Firhouse area, can be considered as part of the Councils on-going support of modal shift within the county; for instance in the on-going delivery of the National Transport Authority supported Sustainable Transport measures Grants in South Dublin.

1. Request that boundaries should be constructed as walls and not fencing as proposed. Noted. At some locations fencing may be appropriate for ecological reasons but in general the entrance points to the Greenway will be considered to require a feature landscape treatment. The Landscape Plan will consider the options regarding boundaries at the detailed design stage.

1. Requests that Pedestrian and Cyclist should be segregated as much as possible.

Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. In this regard it is intended to initiate an education and awareness campaign as part of the delivery of the Dodder Greenway.

1. The riverbank should be opened up for visual enjoyment by pedestrians and use by fishpersons.

Maintaining the existing riparian verge of the river including hedgerows and woodlands is of utmost importance in order to protect the river habitat and the species it supports. The EcIA seeks to benefit biodiversity and naturally there are conflicts such as the requirement for shaded areas for species such as bats and open areas to improve invertebrate availability for fish. NPWS has highlighted the importance of preserving dark areas of the river and vegetation plays a key role in screening these areas from light pollution.

1. Litter is an issue and access points to the Dodder Valley Park and segregated waste facilities should be provided.

Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.

1. The submission highlights a number of facilities which could be facilitated by the greenway such as bike rental, temporary artwork, picnic facilities, QR coded signs and an interpretive centre.

Noted and will be included/considered as part of an overall Landscape plan at the detailed design stage.

1. Requests that native flora and fauna should be introduced.

The River Dodder corridor already contains a rich variety of native flora and fauna including habitats and species protected under the EU Habitats Directive. The Ecological Impact

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| Assessment proposes the planting of additional native woodland and the management of grassland to enhance and promote wildlife.     1. The submission notes that the landfill at Bohernabreena should be sealed. This issue is outside the scope of the current Part 8 proposals.      1. Raises concerns that Kiltipper Road is too busy for use as a Greenway.   Noted. The Part 8 provides for a preliminary design for the Kiltipper Road. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route.     1. Raises concerns that the Old Bawn junction is already very busy and that either a bridge over it or an underpass would be more suitable.   Noted. The Part 8 provides for a preliminary design for the junction and the area adjacent and enhances facilities for pedestrians and cyclists. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction.     1. The submission notes that in the Dodder Valley Park it would be preferable for the Greenway to run along the middle path and not along the north side of the park   Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.     1. The submission states that the swales proposed in Mt Carmel Park should be used instead to form a water feature such as a pond.   Noted. The swales are intended as a low impact surface water drainage mechanism that also can incorporate ecological benefits. Where appropriate this concept could be expanded to include ponds and water features. This will be determined on a case by case basis, assessing the existing environmental condition. With regard to Mt Carmel it should be noted that the grassland habitat at this location is a special one. However this proposal will be further considered at the detailed design stage as part of the landscape and drainage plans.    18 Raises concerns that extending hedgerows to the paths will create a safety hazard where people approaching from one side are not visible from the other side.  Hedgerow planting is part of the ecological enhancements planned in association with the Greenway. A 1m grass verge on either side of the Greenway will be maintained to allow sufficient visibility for users.    19. Suggests that in Mt Carmel Park the lower path/ path closest to the river should be used instead for the Greenway Route instead.  Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. |

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| 1. The submission states that Knocklyon Network would like to see an upgrade of the area around the M50 crossing including an upgrade of the pedestrian bridge below the Firhouse Weir, the provision of angler’s decks, a viewing point and an area for events. The submission also believes it is paramount that the medieval water channel be highlighted as a point of interest.   Noted. The Landscape Plan that will be carried out as part of the detailed design stage will include consideration of these items. The proposals for the landscape will include a general ‘route design’ that will respond to the environmental conditions of each area along the Dodder but will ensure a consistent treatment in terms of design language, materials etc. At various locations such as entrances, special areas of heritage interest, social importance, prominent viewing areas, areas of outstanding beauty or of natural and ecological interest etc. will require an individual landscape treatment that is bespoke to that area. While elements of the design language will remain consistent with the overall route; treatment will ensure that the area retains its special status and is appropriately highlighted. An overall signage and branding strategy will also be prepared for the Greenway that will highlight these areas of interest.     1. The submission states that the M50 underpass should have improved lighting to encourage people to use it after dark.   The lighting plan will be agreed at detailed design stage and will include provision for lighting on health and safety grounds.     1. The submission notes that Knocklyon Network would like to be informed about the hydroelectric project on sheet 11 and other renewable energy projects proposed.   Noted. A very early stage feasibility study was carried out county wide with regard to the possibility of such facilities. Should that project proceed and deemed viable it may be incorporated into the detailed design stage for the Dodder Greenway Part 8.     1. The submission queries where residents of Mt Carmel Park Square will park if their existing parking spaces are given over to the greenway.   Noted. Consideration will be given at the detailed design stage to the incorporation of a small car parking area within close proximity to Mt Carmel Park; subject to ecological evaluation.    24 The submission proposes a new entrance at the junction of the Knocklyon Road and the Firhouse Road near Delaney’s pub which could connect to the Greenway via the Plague Cross and after the underpass. This could then lead to an alternative loop rather than using the underpass.  Noted. A further route from the junction of Knocklyon Road with Firhouse Road will be considered as part of the detailed design stage; subject to detailed design and ecological and other required evaluations.     1. The submission states that between the Plague Cross and the Spawell Bridge there are a number of sites ideal for a playground which was promised to the community. The submission also notes that the local area has the largest primary school in the country and has no playground.   Noted. However this is outside the scope of the current Part 8 for the Dodder Greenway.     1. The submission proposed that there should be an annual mural/ graffiti competition at the underpasses.   Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.     1. The submission states that on Sheet 12 there are a number of swales that could be changed into water features.   Noted. The swales are intended as a low impact surface water drainage mechanism that also can incorporate ecological benefits. Where appropriate this concept could be expanded to include ponds and water features. This will be determined on a case by case basis at the |

detailed design stage as part of the landscape and drainage plans; taking into account the existing environmental condition.

1. The submission states that the balustrade/ railings on the Spawell Bridge should be upgraded to a more aesthetically pleasing design.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. The submission suggests that a fishing deck should be installed at the Spawell Bridge. Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. The submission suggests a performance space at the meander at the rear of Cheeverstown House would be a good addition.

Noted. The high ecological value and sensitivities of this section of the Dodder Valley would preclude this proposal.

1. The submission notes that clearance of invasive species is required at the site of the old Cherryfield House.

Noted. The control of invasive species should be river catchment basis and would require significant financial resources. Invasive species including Japanese Knotweed and Himalayan Balsam are found in locations along the full length of the River Dodder. The preliminary design stage for the Greenway mapped the location of invasive species along the length of the route. This information was shared with SDCC operations and maintenance section and with DCC. A county wide mapping and control regime is underway currently within the operations and maintenance section of SDCC. The mapping information will allow a construction plan to be implemented to ensure the construction of the Greenway does not result in the spread of Invasive Species.

1. The submission notes it would prefer the use of paths closer to the river bank in the Dodder Valley Park.

The Greenway has been designed to use existing paths where possible. Other considerations including available space, flood risk, wildlife, habitats protected under the EU Habitats Directive meant that the Greenway was required to deviate from the riverside. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank.

1. The submission notes that the carpark on the Spawell Road is inadequate and that it should be extended northwards and a one way system introduced. The submission notes it is an important interchange for people travelling by bus/ car/ bicycle and on foot.

Noted. The part 8 proposal includes for an extension of the existing car park at Spawell Road. However the extent is limited by the requirement to protect existing trees. The detail design stage shall examine the parameters further.

1. The submission notes that the area being the Cherryfield Halting Site is a black spot for littering which cannot be maintained because of the steep embankment. The submission proposes that this area be levelled so SDCC staff can access the area to remove rubbish safely. The submission also notes that in this area the hedging is overgrown and it needs to be cut back or thinned out.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. Requests that another route around Kilvere should be found that does not involve going onto Butterfield Avenue. The submission suggests a boardwalk or across the Cheeverstown lands.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway. There are a number of constraints in this section immediately adjacent to the riverbanks, sensitive ecological receptors and invasive species which has required the route of the Greenway to divert from the river at this location.

The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

1. The submission states that the viewing point at the Cherryfield Park exit onto the Firhouse Road should be enhanced.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. The submission notes that there is an opportunity for a water feature at the rear of the Rathfarnham Shopping Centre.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. The submission notes that at the Rathfarnham Shopping Centre the Greenway should avoid using the Springfield Road.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

1. The submission notes that consideration should be given to using an underpass or bridge at the Rathfarnham Road junction.

Alternative design solutions were considered as part of the feasibility and preliminary design stages for this location. Due to a variety of constraints at that location; the current proposed crossing is the most feasible one.

1. The submission suggests that the Lower Dodder Road be made one way to accommodate the Greenway between the Rathfarnham Road junction and the arch.

Noted. This will be further considered at the detailed design stage subject to traffic considerations and ecological and environmental impacts.

1. The submission suggests that a more simple bridge be used between the Lower Dodder Road and Orwell Park and that the Greenway follow the riverside path in Orwell Park rather than the path along the High School playing pitches.

The design of the proposed Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered.

It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements. Options with regard to expanding or amending the existing bridge; which was

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| proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out. The current proposal was considered the best fit with regard to the constraints within the location.    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.    South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    While the above considerations have an impact in terms of the requirements for the bridge design, the designs were carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.    The route passes through Orwell Park – the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.    The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees would require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.    Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography. The design and layout of the bridge allows views to Ely Gate to be framed from the bridge. It is considered that the proposed bridge with the new proposed plaza area on Dodder Road Lower will be a positive visual impact in the local landscape and a feature for the Dodder Valley. |

1. The submissions states that preference should be given to routes that avoid roads and major intersections.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway. Due to a variety of constraints the current proposed route is the most feasible one. The public land within the meander contains protected wildlife shelters and are subject to regular flooding. Springfield Avenue - The existing segregated cycle lanes on Springfield Avenue are being upgraded as part of the greenway. Existing paths along the river in this section will continue to provide access along to the riverbank. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

1. The submission states that junctions, if used, should reflect a preference for pedestrian and cyclists, not cars.

The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform the final design/layout for that section of the route and for the junction.

1. The submission suggests that bicycle facilities such as bike racks should be installed at appropriate locations.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. The submission states that QR codes should be used along the Greenway to give information various aspects of the Dodder corridor.

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

1. The submissions states that universal signage and branding should be used throughout the Greenway.

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 10 – Gretta Hannigan (Inland Fisheries)

This submission relates to the following issues:

1. Notes all works should be completed in accordance with the mitigation detailed in the documentation supplied as part of the application, specifically the mitigation specified in section 7 of the EcIA, a CMP and the IAPS management plan (Appendix D of the EcIA).

Noted. SDCC is committed to ensuring that all methodology and proposals for mitigation contained in the documents listed in the submission are followed. South Dublin County Council will appoint an Ecological Clerk of Works (ECoW) to oversee the implementation of the CESCP and all other mitigation measures and ecological enhancements.

1. Requests that Inland Fisheries be provided with detailed designs for all bridges, culverts and drainage and a copy of the contractors method statement for river crossings, drainage works and riparian works.

Noted. SDCC will provide IFI with said documents in advance of the associated works and will liaise with IFI throughout the Detailed Design stage

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 11 – Muireann O’Dea Dublin Cycling Campaign

This submission relates to the following issues:

1. Broadly welcomes the proposed Dodder Greenway although recommends a width of 5m as per TII publication Rural Cycleway Design

Noted. The design of the Greenway route responds to various constraints and requirements of the environment through which it travels. The appropriate widths have been proposed as best fits. These will be further considered at the detailed design stage; however a standard width is not considered possible.

1. Request that cyclist and pedestrians are segregated beyond Firhouse

Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. In this regard it is intended to initiate an education and awareness campaign as part of the delivery of the Dodder Greenway.

1. Welcomes the proposed new bridges but request that works on the Dodder Falls Bridge be included within the scheme.

Noted. A link from the Greenway at Balrothery Weir to the Tallaght to Templeogue Cycle Route will be included at the detailed design stage, subject to ecological and environmental considerations. Works to the bridge will be considered as part of the scope of that link.

1. Request a 30km/h speed limit be introduced where cyclist share the carriageway with vehicle (in particular along Kiltipper Rd)

Noted. This will be considered as part of the detailed design stage.

1. Request that where the Dodder Greenway runs adjacent to roadsides, the vehicular carriageways are narrowed to 3m lanes in order to encourage slower vehicular speeds. Noted. This is the design intention and will be implemented where possible as part of the detailed design stage.

1. Disappointed with a number of the proposed junction designs as they continue to give greater priority to vehicle eg. Rathfarnham Rd Junction.

The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction.

1. Requests that a comprehensive signage strategy be put in place along the entire route. Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

1. Suitable locations for bike storage should be identified along the Greenway Route. Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. Requests that the final gate entrance to Bohernabreena Reservoir is upgraded to be cyclist friendly

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| Noted. It is intended that all entrances to the Greenway, both existing and proposed will be upgraded to be universal accessible for all legitimate users of the Greenway.     1. Request for additional signage and proposed road crossing at Fort Bridge   Noted and will be considered as part of an overall signage and branding strategy for the Greenway.     1. Requests for additional bike parking at Bohernabreena Noted. Will be considered at the detailed design stage.      1. Requests for the Greenway to be extended into the Reservoir within Bohernabreena This request is considered outside the scope of the current Part 8 proposals.      1. Objects to the planting of trees along proposed greenway route within Kiltipper Park as they will spoil the view and become a maintenance issue.   The planting will be further considered at the detailed design stage as part of the Landscape Plans. The planting in Kiltipper Park is intended to enhance the ecological value of the area and complement the Greenway. Placement will be carefully considered to ensure views are protected; tree planting can frame and enhance views where carefully done.     1. Request for a reduced speed limit of 30kph to be put in place for Kiltipper Rd Noted. Will be considered at the detailed design stage.      1. Queries proposed design of Ellensborough Roundabout – could cyclist share with traffic here as volumes of vehicular traffic will be low?   The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction. The proposed roundabout will be designed in accordance with the National Transport Authority’s National Cycle Manual to facilitate all user levels.     1. Requests that consideration be given to the provision of a fully segregated off road route along Kiltipper road, notwithstanding the likely requirements for land purchase, to ensure that the quality of the proposed route is maintained along this section. However, should the scheme proceed with the shared traffic route option then the introduction of a variety of traffic calming measures, such as planters and ramps, the critical vertical design of the proposed traffic ramps, and a speed limit of 30 km/h limit, clear 30 km/h intermittent road markings and signage, and rigorous follow-up speed monitoring after construction, should be include in order to verify that cyclists are safe on the new route.   Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative proposals for the section along Kiltipper Road. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. We will consider the proposals outlined such as planters and ramps, the critical vertical design of the proposed traffic ramps, and a speed limit of 30 km/h limit, clear 30 km/h intermittent road markings and signage, and rigorous follow-up speed monitoring after construction and others as part of the detailed design stage.     1. Request the design of two junctions along Old Bawn are reviewed to reduce the number of crossing movements for pedestrians and cyclists.   The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction. |

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| 1. Request that kissing gate at Old Bawn Road into Dodder Valley Park needs to be upgraded to a design that is suitable for all bicycle types, including cargo bikes.   Noted. It is intended that all entrances to the Greenway, both existing and proposed will be upgraded to be universal accessible for all legitimate users of the Greenway.     1. Request for additional Toucan crossing to be provided at Avonbeg Road Junction.   Noted. This will be considered at the detailed design stage; subject to traffic considerations.     1. Request for link to Tallaght – Templeogue cycle route to be included in proposed scheme.   Noted. A link from the Greenway at Balrothery Weir to the Tallaght to Templeogue Cycle Route will be included at the detailed design stage, subject to ecological and environmental considerations.     1. Request for upgrading of existing route crossing at ‘Dodder Falls’ heading northwards to link with existing Tallaght – Templeogue cycle route   Noted. A link from the Greenway at Balrothery Weir to the Tallaght to Templeogue Cycle Route will be included at the detailed design stage, subject to ecological and environmental considerations. Works to the bridge will be considered as part of the scope of that link.     1. Request that Dodder Greenway route should be provided as 4.0m wide as a minimum   The design of the Greenway route responds to various constraints and requirements of the environment through which it travels. The appropriate widths have been proposed as best fits. These will be further considered at the detailed design stage; however a standard width is not considered possible.     1. Request for upgrade of the Wellington Lane/Firhouse Road junction in line with best practice to be included as part of proposed scheme.   Noted. Will be considered at the detailed design stage; subject to traffic considerations.     1. Request for segregation of pedestrian and cyclist along proposed greenway within park sections were there is adequate room to provide a more pleasant walking and cycling experience and reduce the number of conflicts.   Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.     1. Request that the existing on-road cycle lane (approximately 250m) along the Firhouse Road section be upgraded to a separated cycle track, to maintain the projected high standard of this proposed Greenway route.   Noted. Will be considered at the detailed design stage.     1. Request the design of Firhouse Road/Ballyroan Road junction is reviewed to reduce the number of crossing movements for pedestrians and cyclists.   The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction.     1. Request that the proposed raised off road cycle track along Butterfield Avenue, be extended as far as Kilvere.   Noted. Raised off road cycle tracks along Butterfield Avenue are proposed within the Part 8 proposals. However opportunities to further enhance the greenway facilities along this road section will be considered at the detailed design stage.     1. Suggests that existing 2m wide shared surface at the Rathfarnham Shopping Centre is too narrow and needs to be widened as part of the proposed scheme. Also the underpass |

should be upgraded so that it is not necessary to cross the road to continue on the Greenway.

Noted. Will be considered at the detailed design stage.

1. Requests for segregation of pedestrian and cyclists for section of Greenway Route along Springfield Avenue.

Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The shared surface will be consistent design along the majority of the route in South Dublin County Council.

1. Request for existing tracks near the river which are overgrown and not well maintained, be better maintained to provide an alternative route for pedestrians and joggers that is quieter (less traffic noise) and one that does not have the risk of conflict with cyclists.

Noted. Maintenance is outside the scope of the current Part 8 requirements; however the maintenance of the Greenway will be of high importance to the successful delivery and operation of the Dodder Greenway. An operational and maintenance strategy will be prepared to ensure successful delivery in this regard.

1. Request for upgrading of existing path from Butterfield Avenue (at Butterfield Park) through Fairways to Springfield Avenue to create another link for cyclists and pedestrians between Rathfarnham and the Greenway

This is not proposed within the current Part 8 proposals. Further enhancements may be made to increase accessibility to the route as part of the Councils on-going support of modal shift within the county; for instance in the on-going delivery of the National Transport Authority supported Sustainable Transport Measures Grants in South Dublin or as part of the annual maintenance programme.

1. Request that proposed junction upgrade at the Rathfarnham Road/Springfield Avenue is amended to include Toucan Crossings, to enable cyclists to join or leave the proposed ‘Greenway’ route at this point.

The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction.

1. Request that the proposed ramp upgrade includes replacing the steps leading to Lower Dodder Road with a ramp, as these are a hazard for cyclists who are unfamiliar with the route and also suggest a clearer connection link along the Greenway across the Rathfarnham Road into and from Dodder Road Lower through the use of different materials.

Noted. The removal of the steps are included as part of the current Part 8 proposals. Materials will be considered at the detailed design stage.

1. Suggests that the proposed greenway design ‘shared footway’ along the Lower Dodder Road is sub-standard and the proposed Greenway design should be reviewed and improved. Either A) Restrict the entry details at both ends of Lower Dodder Road between Woodside and Dodder Park Drive, to signal that this section is restricted vehicle access, and make all of this section of roadway a 30 km/h zone with a designed shared traffic and cycling environment –or b) Make the above section of roadway a one-way vehicle route, and include a segregated 2-way cycle route with the inclusion of appropriate staggered residential vehicle parking bays to slow traffic speeds.

Noted. Will be considered at the detailed design stage; subject to traffic considerations and environmental considerations.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 12 – Cllr Deirdre O’Donovan

This submission relates to the following issues:

1. Largely welcomes the proposed scheme. Noted.

1. Raises concern with regards to the loss of Green Space in the Ellensborough Estate to provide for car parking. Requests confirmation that there will be no further loss of Green Space for the area and that the proposed car parking area will be properly maintained and well lit. Noted. There are no proposals within this Part 8 to further impinge on the Open Space within Ellensborough, other than that proposed.

1. Concerns raised with regards to the proposed narrowing of Kiltipper Road and the safety of cyclists in using the proposed roadway.

Noted. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. We will consider the proposals outlined such as planters and ramps, the critical vertical design of the proposed traffic ramps, and a speed limit of 30 km/h limit, clear 30 km/h intermittent road markings and signage, and rigorous follow-up speed monitoring after construction and others as part of the detailed design stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 13 – Niamh O’Reilly**    This submission relates to the following issues: as contained within Submission No. 4 This submission relates to the following issues:  1. Concerns raised with regards to the ability to use the greenway for Dog Walking. No accommodation has been given to the regular dog walkers that use the park currently many of whom walk their dogs “off leash”. The proposed Dodder Greenway does not provide an improved environment for all pedestrians - specifically the significant dog walking pedestrians will be adversely affected. Request accommodation of dog walkers within the scheme as they are already a well-established group of users with the area to include provision of approved off leash dog walking facility.  The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.    Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment. |

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| Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.    Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.    http://www.sdcc.ie/services/environmental-health/animal-control/dogs     1. Greenway goes through a seat “Cormacs seat” restored and maintained by the Cherryfield Dog Walkers association, in memory of one of their own dog walkers who has passed away. Noted and will be included/considered as part of an overall Landscape plan at the detailed design stage      1. Questions the need for the Greenway as recently constructed cycleway already exists along Firhouse road adjacent to the Cherryfield Dodder Park section and raises concerns raised with regards to high speed cyclists using the Dodder Greenway and the potential conflicts with pedestrians and dog walkers.   Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The following is definition of a Greenway.    “Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.  (Lille Declaration, European Greenways Association, 12th September 2000).”    The detailed design stage will further examine ways to mitigate against excessive speeds and will examine the use of such initiatives such as pedestrian and cycle counters and speed monitors at critical locations. Should the greenway be subject to excessive cycle commuting pressures the provision of additional alternative routes will be considered. It should be noted that within South Dublin County council there has been a programme of cycle network delivery, which has delivered cycle routes over a number of years. This programme is ongoing and primarily aimed at facilitating commuters and other cyclists. The Greenway may accommodate commuting in a low speed, park land environment but will be designed to ensure it will not be dominated by it.     1. Welcomes the initiative to include Bat friendly lighting along the route. Noted.      1. Request for bin/waste facilities for dog poo. Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.      1. Welcomes to initiative to include CCTV at a number of locations along the route. Noted.      1. Request that any proposed Landscape is cognisant of the existing biodiversity and does not adversely affect the current biodiversity. |

Noted and will be considered as part of an overall Landscape plan at the detailed design stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 14 – Helen Flynn

This submission relates to the following issues:

1. Concerns have been raised in respect of car parking facilities in front of the cottages (namely Briar and Bramble Cottages) on Kiltipper Road.

One additional parking space will be provided directly in front of the cottages therefore providing five car parking spaces in total. These parking spaces cannot be dedicated to the cottages as they will be in a public space. There is insufficient space to provide any additional road side parking spaces in this area. Six road side car parking spaces have been provided further west along Kiltipper Road. Noted. A number of residents have made submissions to the public consultation process as appropriate. A number of landowners have also discussed proposals with SDCC during the Part 8 process. Issues raised will be considered and addressed with the residents during the detailed design stage

1. Concerns regarding vehicles exiting the cottages have been raised.

Adequate space and sight lines exist and will be maintained for vehicles exiting the cottages.

1. Maintenance of the proposed grass verge in front of the dwelling is being questioned. The detail of the verge will be further considered at the detailed design stage in consultation with the adjacent resident.

1. Existing calming ramps causing disturbance, request to locate the new ramps away from the existing cottage dwellings.

Noted. This will be considered as part of the detailed design stage. It is intended that proposed calming ramps are to be located away from the existing dwellings.

1. Queries if proposed ramp design will be sufficient to reduce speed limits and have a calming effect on Kiltipper Road.

Noted. This will be considered as part of the detailed design stage. Ramps will be designed and installed in accordance with the recommended guidelines in order to create a speed calmed environment.

1. Issues relating to littering and rubbish and concern regarding increased littering with new path.

Noted. Maintenance is outside the scope of the current Part 8 requirements; however the maintenance of the Greenway will be of high importance to the successful delivery and operation of the Dodder Greenway. An operational and maintenance strategy will be prepared to ensure successful delivery in this regard.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 15 – Caragh Coote

This submission relates to the following issues:

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| 1. Concerns raised with regards to the ability to use the greenway for Dog Walking. No accommodation has been given to the regular dog walkers that use the park currently many of whom walk their dogs “off leash”. The proposed Dodder Greenway does not provide an improved environment for all pedestrians - specifically the significant dog walking pedestrians will be adversely affected. Request accommodation of dog walkers within the scheme as they are already a well-established group of users with the area to include provision of approved off leash dog walking facility.  The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.    Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment.    Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.    Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.    http://www.sdcc.ie/services/environmental-health/animal-control/dogs     1. Greenway goes through a seat “Cormacs seat” restored and maintained by the Cherryfield Dog Walkers association, in memory of one of their own dog walkers who has passed away. Noted and will be included/considered as part of an overall Landscape plan at the detailed design stage      1. Questions the need for the Greenway as recently constructed cycleway already exists along Firhouse road adjacent to the Cherryfield Dodder Park section and raises concerns raised with regards to high speed cyclists using the Dodder Greenway and the potential conflicts with pedestrians and dog walkers.   Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The following is definition of a Greenway.    “Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.  (Lille Declaration, European Greenways Association, 12th September 2000).”    The detailed design stage will further examine ways to mitigate against excessive speeds and will examine the use of such initiatives such as pedestrian and cycle counters and speed monitors at critical locations. Should the greenway be subject to excessive cycle commuting pressures the provision of additional alternative routes will be considered. It should be noted that within South Dublin County council there has been a programme of cycle network delivery, which has delivered cycle routes over a number of years. This programme is on- |
| going and primarily aimed at facilitating commuters and other cyclists. The Greenway may accommodate commuting in a low speed, park land environment but will be designed to ensure it will not be dominated by it.     1. Welcomes the initiative to include Bat friendly lighting along the route. Noted.      1. Request for bin/waste facilities for dog poo. Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.      1. Welcomes to initiative to include CCTV at a number of locations along the route. Noted.      1. Request that any proposed Landscape is cognisant of the existing biodiversity and does not adversely affect the current biodiversity.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 16 – Ray Donnellan (Dublin Bus)

This submission relates to the following issues:

1. Insufficient lane widths are proposed along Butterfield Avenue and at its junction with Ballyroan Road.

Lane widths to be increased to 3.25m in width along Butterfield Avenue. Sufficient widths have been provided at the junction with Ballyroan Road.

1. Conflict with the raised cycle track at bus stop locations.

Noted. This will be considered as part of the detailed design stage. Bus stops will be reinstated in their current locations. Cycle lanes will be routed around the bus stops in accordance with the NTA National Cycle Manual.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 17 – Elizabeth Dodds

This submission relates to the following issues:

1. Question raised about the routing of the proposed Greenway and its original intention to route it along the River Dodder through the open area at Kilvere. Concerns raised regarding directing Greenway users off the Dodder and onto Butterfield Ave.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes for the section along Butterfield Avenue. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further consideration of the proposals along Butterfield Avenue will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 18 – Keith Scanlon

This submission relates to the following issues:

1. Request that comprehensive quantitative targets and real time monitoring should be included as mitigation. It also states that there should be a plan committed to by SDCC to protect the river and surrounding habitat quality.

The EcIA commits to yearly monitoring of otter and bats along the river for at least three years post construction and longer as required by NPWS. Both otter and bat species are listed on Annex IV of the EU Habitats Directive. The aim of the Greenway is to have a neutral to positive impact on biodiversity of the Dodder corridor. A range of mitigation measures and enhancements listed in the documents submitted as part of the planning application will ensure that the habitats of the River Dodder Corridor are protected and enhanced where possible.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 19 – Andrew Parkes (An Taisce)

This submission relates to the following issues:

1. Disappointed that parts of the Greenway run along roads instead of the river, specifically from Kiltipper Rd to Old Bawn Rd, on the busy Firhouse Rd (Cherryfield) to Butterfield Ave. (R114) and through Kilvere Estate, and on Springfield Rd (R112) Hoped that more of the Greenway could have used Dodder Valley Park north of the road.

The Greenway has been designed to use existing paths where possible. Other considerations including available space, flood risk, wildlife, habitats protected under the EU Habitats Directive meant that the Greenway was required to deviate from the riverside. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank. The following outlines the reasons for on-road travel of each section listed in the submission. Kiltipper- the lands adjacent to the river are privately owned and contain Annex I habitat (Tufa forming springs and Alluvial Woodland). Knocklyon Road to Kilvere - Much of the lands adjacent to the river are privately owned. The public land within the meander contains protected wildlife shelters and are subject to regular flooding. Springfield Avenue - The existing segregated cycle lanes on Springfield Avenue are being upgraded as part of the greenway.

The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further consideration of the proposals along streets will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

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| 2. The Orwell bridge with spanned section and ramped sections will be obtrusive on both sides of the river.  It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements.    Options with regard to expanding or amending the existing bridge; which was proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out. The current proposal was considered the best fit with regard to the constraints within the location.  South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.    The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.  The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.    While the above considerations have an impact in terms of the requirements for the bridge design, the designs were carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.    Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography. The design and layout of the bridge allows views to Ely Gate to be framed from the bridge. It is considered that the proposed bridge with the new proposed plaza area on Dodder Road Lower will be a positive visual impact in the local landscape and a feature for the Dodder Valley.     1. Unclear about the extent of consultations with residents or councillors in the DCC area.   Statutory Public Consultation was carried out in accordance with the requirements of the Part 8 process. Non-Statutory Consultation was also carried out. Details of consultation are set out in Section 1.3 of the Part 8 Report.     1. Section 85 agreement was for 50 m on both sides of the river. The structure extends beyond this zone into the DCC area.   The Orwell Bridge structure is within 50m of the river bank as per the Section 85 agreement. The route ties into the adjacent footpaths using a sloped embankment in order to fully comply with accessibility requirements and best practice with regard to universal access |

design requirements. The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

5. The oak trees would hide the ramped sections but not the spanned sections and would take up part of the grassland. No photomontages or indicative 3D images seen by An Taisce. DCC should make decision having considered the views of DCC area residents and users of Orwell Park.

The existing trees within Orwell Park are retained, and the proposed bridge was carefully sited to ensure it merged into the existing landscape and minimised visual impact as much as possible. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements.

Options with regard to expanding or amending the existing bridge; which was proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out. The current proposal was considered the best fit with regard to the constraints within the location.

South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.

The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.

While the above considerations have an impact in terms of the requirements for the bridge design the designs were carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.

Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography.

The design and layout of the bridge allows views to Ely Gate to be framed from the bridge. It is considered that the proposed bridge with the new proposed plaza area on Dodder Road Lower will be a positive visual impact in the local landscape and a feature for the Dodder Valley.

The Section 85 agreement allows for South Dublin County Council to carry out the required planning processes in relation to the bridges on behalf of Dublin City Council.

6. Not clear why modest proposals of Feasibility Study Report have given way to the proposed structure and possible removal of the existing pedestrian bridge.

The Feasibility Report was a high level report that outlined the feasible options available; however it was an early stage process that was completed without the benefit of in-depth surveys such as topography, CFRAMS investigations etc. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements.

Options with regard to expanding or amending the existing bridge; which was proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out. The current proposal was considered the best fit with regard to the constraints within the location.

South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.

The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.

While the above considerations have an impact in terms of the requirements for the bridge design, the designs were carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.

It is intended to retain the existing bridge at Orwell Park as it provides pedestrian access for the nearby school. The existing riverside pathway is being retained and will continue to be accessible to all users; including those of the Greenway.

7. An Taisce has not seen any arboricultural assessment of the trees to be lost or any photomontages or indicative 3D images of the landscape after construction.

Noted. The design of the proposed Bridges were carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: the Parks, existing trees, existing riverside vegetation, surrounding houses, Ely Gate and the historic features within the parks. Also existing usage within the area such as the existing pedestrian bridge at Orwell which accommodates access to a nearby school and the existing pedestrian bridge at Bushy Park, which provides access to the riverside walk had to be carefully considered.

The proposed bridges at Orwell Park and Bushy Park are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The preliminary design stage envisaged that there is little impact proposed to existing trees by the proposals within Orwell Park. At the detailed design stage further initiatives to decrease impact on the existing vegetation and the environment will be further examined in consultation with an arboriculturist and the parks and landscape services section in Dublin City Council and the public realm section in South Dublin County Council.

The preliminary design stage envisaged that a number of trees within Bushy Park will be affected and this was outlined within the Environmental report. The impact was minimised as much as possible by the proposed location of the bridge, chosen to avoid the more healthy and established specimen trees. At the detailed design stage further initiatives to decrease impact on the existing vegetation and the environment will be examined in consultation with an arboriculturist and the parks and landscape services section in Dublin City Council and the public realm section in South Dublin County Council.

1. The bridge could have a negative visual impact on Ely Arch, a protected structure.

The proposed Orwell Bridge is located on the opposite side of the road junction at Dodder Rd Lower from Ely Gate (Dodder Arch) which is a Protected Structure listed under schedule 2, South Dublin County Development Plan 2016-2022 RPS Ref. 201. Ely Gate is located within an area of open space which provides an immediate setting to the structure therefore it is very much a separate and standalone element which is a landmark feature at this location given its context and is highly visible from the road junction along the R112 at it sits within a corner site.

The proposed Orwell bridge is located some distance from the rear site of Ely Gate and will be located within an area of established green, the landing level will be opposite to the rear site of Ely Gate providing a new viewing point of Ely Gate at this location and additional passive surveillance. The new bridge feature will be viewed from the Dodder Road Lower and will not be visible at the main road junction along the R112 therefore will not compromise views of Ely Gate from its principle façade and front site. Along the Dodder Rd Lower junction the proposed bridge structure and the Protected Structure may be viewed at the same time but by virtue of its setting Ely Gate will not be competing at this point and will very much remain the dominate built feature. It is considered that the visual overall impact of the proposed bridge in an adjacent site to Ely Gate will have a negligible impact and there will be no direct impact on the protected structure or its setting given its prominent location and its current context.

The details provided of the bridge with regard to the cross sections and location are for preliminary design stage therefore it is considered that due to the proximity of the proposed Orwell bridge to the rear site of a Protected Structure the overall design, materials and finishes should take cognisance of the adjacent protected structure ensuring that the overall visual effect of the bridge at this location is kept to a minimum and this can be achieved by good overall design and use of appropriate materials. Details of the proposed Orwell bridge will be referred to both Councils Architectural Conservation Officers for comment and agreement prior to final design. The council agrees to further consult with the relevant stakeholders prior to completion of the final design.

1. The bridge will be redundant unless and until Section 1 of the Greenway is developed by DCC and should be removed from the Part VIII proposal until this happens.

It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. The delivery of any combination of the feasible Greenway routes within Dublin City Council and Dun Laoghaire-Rathdown County Council areas do not preclude universal access to Orwell Park or Bushy Park from South Dublin County.

1. Bushy Park bridge is not essential to Section 2 of the Greenway.

Bushy Park Bridge will provide an important link to the Dodder Greenway for residents within Dublin City while also providing a valuable link to Bushy Park for the residents of Rathfarnham. The proposed bridge at Bushy Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into Bushy Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. High quality links to and from Greenways are considered important in terms of accessibility, encouraging usage and providing economic benefit to adjacent communities.

1. Trees on both sides of the demesne wall form a continuous treescape and trees inside the wall are particularly prominent. Some trees would have to be removed to accommodate the bridge, and An Taisce has not seen any arboricultural assessment of the trees to be lost or any photomontages or indicative 3D images of the landscape after construction

Noted. The proposed Bushy Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Bushy Park, existing trees, existing riverside vegetation, usage within the park, the Bushy Park riverside walk and its historic wall, and other historic features within the park.

The proposed bridges at Orwell Park and Bushy Park are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The preliminary design stage envisaged that a number of trees within Bushy Park will be affected and this was outlined within the Environmental Report. The impact was minimised as much as possible by the proposed location of the bridge, chosen to avoid the more healthy and established specimen trees. At the detailed design stage further initiatives to decrease impact on the existing vegetation and the environment will be examined in consultation with an arboriculturist and the parks and landscape services section in Dublin City Council and the public realm section in South Dublin County Council.

1. The limestone wall acts as a retaining wall for the woodland to the north. An Taisce has not seen any architectural heritage assessment of the impact of the bridge on the demesne wall or on the future stability of the adjacent sections.

It is considered that the preliminary design for the Bushy Park Bridge has taken the overall setting into account in reaching a preliminary design. It is considered that any impact is negligible and could be mitigated by way of appropriate design, materials and finishes as part of the final design stage. Details of the final design for the bridge at this location will be referred to Dublin City Councils Architectural Conservation Officers for comment and final agreement. The current Part 8 proposals with regard to Bushy Park bridge does not require any demolition of Bushy Park Wall. The Part 8 Report considers the possibility of demolition should it be required during the construction stage only and proposed mitigation to be taken in that case. However the council intend to proceed with the detailed design and construction stages on the basis of the current proposed design and will not include the requirement to demolish any portion of the Bushy Park wall.

1. There are existing river crossings at Bushy Park.

The existing pedestrian bridge at the confluence of the Owendoher and the Dodder at Bushy Park is not wide enough to accommodate the Greenway, nor is it universally accessible due (in the main), to the steep, stepped access to it from the South Dublin County side.

1. Is the proposed bridge justified in the absence of information on its impacts?

Although sub threshold development, an Environmental Impact Assessment was undertaken during the Feasibility stage. Environmental Impact Assessment screening was carried out at the Option Selection and preliminary design stage of the project. Environmental concerns were a foremost driver in the design of the proposed Greenway. Landscape and Visual and Archaeological and Architectural assessments were undertaken to ensure potential impacts were assessed and mitigated where necessary. A summary of these assessments is provided in the Part 8 Report and extracts are provided below. Ecology was identified during the Screening stage and in consultation with the various consultees to be the primary environmental aspect of concern. Detailed ecological surveys and assessments were undertaken over a 2 year period to provide a robust baseline for assessment. The findings of these surveys were presented to National Parks and Wildlife Service as well as the Parks and Landscape Services and Public Realm sections as well as the Biodiversity Officer and Heritage Officers of the respective Councils. This information has been presented in the Ecological Impact Assessment (EcIA) Report. The current Part 8 proposals with regard to Bushy Park bridge does not require any demolition of Bushy Park Wall. The Part 8 Report (copied below) does consider the possibility of demolition should it be required during the construction stage only and proposed mitigation to be taken in that case. However the council intend to proceed with the detailed design and construction stages on the basis of the current proposed design and will not include the requirement to demolish any portion of the Bushy Park wall.

**Section 3.2 of the Part 8 Report “Architecture, Archaeology and Cultural Heritage”** It is further recommended that all groundworks associated with the construction of the bridges across the Dodder be monitored by a suitably qualified archaeologist. Any topsoil stripping along the banks of the River Dodder should also be subject to metal detection survey. This work should be carried out under licence to the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs (DAHRRGA). Full provision should be made available for the resolution of any archaeological remains, both on site and during the post excavation process, should that be deemed the appropriate manner in which to proceed.

Construction activities associated with the bridges have the potential to adversely impact on archaeology particularly the section of Bushy Park demesne wall that travels between the demesne and the western bank of the River Dodder. A portion of this wall may require demolition. It is recommended that the section of the Bushy Park demesne wall to be impacted upon be subject to a full written and photographic record prior to construction going ahead. This should be carried out by an appropriately qualified professional.

Section 3.3.2 Route Corridor Analysis (Landscape & Visual Analysis)

Regarding Orwell Park Bridge.

The route passes through Orwell Park – the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on

a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.

The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees may require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.

Regarding Bushy Park Bridge.

Midway along Springfield Avenue a new bridge is proposed over the Dodder River linking the cycleway to Bushy Park. Coupled with the improved parking and related amenities at this location this would be in keeping with the Bushy Park Masterplan and the Greenway and the Masterplan would be mutually complementary and not raise significant landscape and visual impact issues. As elsewhere, the proposed bridge is an urban design opportunity and consideration of the design and its aesthetic contribution is important particularly in the context of this much loved historic demesne and park. However the straight alignment (90degree crossing) of the proposed link will integrate well.

Landscape and Visual Impact Issues

* Generally benign interventions and changes complementary to existing uses, character and trends throughout the corridor.
* Architectural opportunities posed by new river crossings at Orwell Park and Bushy Park. The river crossings present an opportunity to create new landscape features at each location and contribute to the experience, brand and image of the route as well as its functionality.

Mitigation

* Relocation of ramps and/or tree planting to integrate ramps into Orwell Park
* Detailed design of proposed bridges present an opportunity to create new landscape features at each location and contribute to the experience, brand and image of the route as well as its functionality.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 20 – John Hickey / Brendan Mc Donald (Dodder Community RA)

This submission relates to the following issues:

1.Welcomed the scheme in principal and make the following points:

Noted.

1. Safety concerns raised in respect of the provision of life rings, raising existing parapet walls, basic maintenance required, adequate lighting and lane width reduction.

Noted. A complete safety audit will be conducted prior to construction of the works and the respective safety standards will apply in order to make this a universally safe environment.

The route will be lit with new public lighting along its length. Carriageway lane widths are being reduced to offer added traffic calming and Greenway user safety.

1. Implementation of flood protection

The proposed scheme has been designed so as not to impact on or exacerbate the existing flooding conditions of the River Dodder. The CFRAMS analysis of the River Dodder have highlighted a number of flood remediation proposals which do not form part of this scheme but are being reviewed under an alternative scheme dedicated to flood protection. In relation to the Greenway, it was necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.

1. The amenity value of the proposed Greenway is recognised and suggestions regarding servicing of the Greenway are raised.

Servicing the Greenway by way of installing benches, bins, CCTV and street furniture have been considered and will be further detailed at detailed design stage. This will be considered as part of an overall Landscape Plan at the detailed design stage.

1. Potential for good signage and branding should not be overlooked

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 21 – Michael O’Boyle

This submission relates to the following issues:

1. Objects to the proposed Dodder Greenway as it is a complete waste of tax payers money Noted.

1. Objects to the installation of cycle facilities in the area as existing pathways are already adequate for cyclists.

Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. The following is definition of a Greenway.

“Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.

(Lille Declaration, European Greenways Association, 12th September 2000).”

The detailed design stage will further examine ways to mitigate against excessive speeds and will examine the use of such initiatives such as pedestrian and cycle counters and speed monitors at critical locations. Should the greenway be subject to excessive cycle commuting

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| pressures the provision of additional alternative routes will be considered. It should be noted that within South Dublin County council there has been a programme of cycle network delivery, which has delivered cycle routes over a number of years. This programme is ongoing and primarily aimed at facilitating commuters and other cyclists. The Greenway may accommodate commuting in a low speed, park land environment but will be designed to ensure it will not be dominated by it.    3. The proposed Dodder Greenway does not provide an improved environment for all pedestrians - specifically the majority of whom are dog walking pedestrians and who be adversely affected.  The Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian (including dog walkers) / cyclist environment and while accommodating cyclists; it will not preclude use by dog walkers. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.    Parts of the route will be less used than others; it is likely the upstream sections with South Dublin County Council will be primarily used by leisure users and people travelling shorter distances, connecting villages and so on. However, the ability to connect into the city centre and to the Dublin Mountains will make this a highly desirable route by people doing longer distances, travelling a highly scenic route and it is envisaged that there will be some use by commuters; albeit in a low speed environment.    Since 2011 South Dublin County Council have permitted cycling in all parks and open spaces; subject to the cyclists doing so in a responsible manner. This permission was contained within the Parks and Open Spaces Bye-Laws, which were adopted by the full council in 2011 and they have been in force since then.    Similarly dog owners are also asked to have respect for other park users and “effective control” of their dog. The following link outlines the control of dogs required in South Dublin’s public places.     1. Objects to the existing car park being extended as this will disturb and endanger the existing adjacent mature trees. Consideration should be given to proving a car park in the playing field directly opposite nearer to the Firhouse Rd junction.   Noted. The part 8 proposal includes for an extension of the existing car park at Spawell Link Road. However the extent is limited by the requirement to protect existing trees and is not intended to impact on pitches. The detail design stage shall examine the parameters further.     1. Object to money being spent of new entrances to replace perfectly acceptable entrances that already exist.   Noted. It is intended that all entrances to the Greenway, both existing and proposed will be upgraded to be universal accessible for all legitimate users of the Greenway.    A Landscape Plan will be carried out as part of the detailed design stage and will include consideration of these items. The proposals for the landscape will include a general ‘route design’ that will respond to the environmental conditions of each area along the Dodder but will ensure a consistent treatment in terms of design language, materials etc. At various locations such as entrances, special areas of heritage interest, social importance, prominent viewing areas, areas of outstanding beauty or of natural and ecological interest etc. an individual landscape treatment will be proposed that is bespoke to that area. While elements of the design language will remain consistent with the overall route; treatment will ensure that the area retains its special status and is appropriately highlighted. It is intended that these proposals, while improving the environment of the Dodder Valley, will also represent value for money and be hard wearing and robust. It is envisaged that the proposals for the Dodder Greenway will enhance the environment through which it passes and may help to enhance economic opportunities for adjacent local enterprise. |

1. Request the provision of waste bins in the area and requests that South Dublin County Council should review and revise their deliberate policy of not providing bins in the region Noted.

As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.

1. Objects to the installation of CCTV, as once they are vandalised they will be a waste of tax payers money.

Noted. CCTV is considered as an option, amongst a number of others, to enhance security and safety to users of public facilities. However the first line of provision is design detail, location, increased usage, passive surveillance and other ‘safety by design’ measures. In some locations CCTV provision is considered warranted and will be provided where necessary. However these considerations will be reviewed at the detailed design stage and should the provision not be warranted it will be removed from the scheme.

1. Considers that the proposed plan will adversely affect current biodiversity, despite the biased findings in the reports commissioned by South Dublin County Council.

The Ecological Impact Assessment (EcIA) and Appropriate Assessment (AA) Screening followed best practice guidelines as cited in the texts. Following NRA/ TII Guidelines for Assessment of Ecological Impacts on National Roads (2009), which defines receptors, both species and habitats, of local, county, national and international importance, none of the identified Key Ecological Receptors (EcIA Section 5.3) can be described as of national or international importance in this regard. The Greenway has been designed with biodiversity in mind and with the aim of having an overall neutral to positive impact on biodiversity. A suite of protective measures, including: mitigation to protect the river habitat during construction and operation; ecological enhancement measures proposed to increase the quality of habitats in the Dodder Valley; post construction monitoring of bats and otter; and ongoing consultation with NPWS during detailed design stage have been submitted as part of the Part 8 proposals. Avoidance of sensitive habitats and in stream works have further reduced the impacts of the greenway at the earliest possible stage.

The Ecological Impact Assessment was carried out of the whole watercourse and route of the Greenway as detailed in the EcIA and the potential impacts on the habitats and species were assessed based on the populations within the entire river corridor. The accusation of bias in the findings is not accepted.

1. Objects to the plan as it is not inclusive of the needs or facilitate the older members of the community.

The proposed Dodder Greenway is designed as a universally accessible route. It is proposed as a shared pedestrian / cyclist environment (through existing parkland) and is not be designed as a route for high speed cyclists. Proposed measures will be further examined at the detailed design stage to enhance the quality of the shared route. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 22 – NPWS

This submission relates to the following issues:

1. The route in some sections is not finalised- Donnybrook-Clonskeagh; Milltown-Orwell Park and routing through Milltown Golf Club is of significance as it provides a refuge for mammals.

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| It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. All route options under considerations at these locations were assessed for the EcIA (Section 2.2.1). The Greenway will not include fencing that would prevent Otter or Badger crossing it (Section 5 of the Otter and Badger Derogation Licence applications). Badger and Otter are both mainly nocturnal and would not be impacted by cyclists/pedestrians during the day. The final lighting plan will be designed at detailed design stage in accordance with the Lighting Code presented in Sections 5.5.4 and 7.4.9 of the EcIA and will be agreed with the NPWS.     1. Notes there are three additional reports on habitats and rare invertebrates (references provided).   The data in these reports has been considered and the reports do not contain information that would change the potential impacts, design or mitigation already detailed in the EcIA.     1. NPWS raise concerned about increased access to Glenasmole Valley SAC, Wicklow Mountains SAC/SPA.   The footprint of the Greenway is not within any Natura 2000 site and does not propose any new access points to Natura 2000 sites within the zone of influence. There is already an established route from Fort Bridge to Glenasmole, the Dublin Mountain Way. Further details on access to the three sites in the Glenasmole Valley are provided below.   * Glenasmole Valley SAC – The existing paths along the valley are fenced off by farmland and private homes. * Wicklow Mountains SPA – The nearest access point to the SPA is at the top of the upper reservoir (3 km from the Greenway). The lands within the SPA closest to the Greenway are open and exposed and would not attract recreational users. * Wicklow Mountains SAC – The nearest access point to the SAC is at the top of the Dodder valley (5 km from the Greenway). The lands within the SAC closest to the Greenway are open and exposed and would not attract recreational users.      1. NPWS raise concerns about habitat loss and damage to the Dodder Valley pNHA, especially where the bridge crosses the river within the pNHA.   Surveys undertaken in 2016 have shown that there is no riparian woodland at the point where the bridge crosses the Dodder and therefore there will be no loss of Annex I habitat. Access to the woodland on the north side of the river is currently available from Avonmore Road to the west. The bridge’s purpose is to permit access from the north side of the Dodder to the Greenway, not to the woodland on the north side of the river.     1. The EcIA has not quantified habitat loss as a percentage.   Section 4.5 of the EcIA states no Annex I habitat will be lost. Section 5.4.3 states that new paths will constitute 13% of the total Greenway area. The percentage loss of habitat, especially ecologically important habitat, would be very small with respect to the total available similar habitat in the Dodder Valley.     1. Queries EcIA, States that Common Terns have been recorded nesting at the mouth of the Grand Canal Docks and this has not been considered in the EcIA.   No terns were recorded nesting in Spring/Summer 2016. The Dublin City Ecological Baseline and Concept Design (DCC, 2016) describes the site as a former nesting site and suggests providing a floating pontoon as a new nesting opportunity.     1. Maintenance of connectivity between the Dodder, Canal and Liffey for otters should be included.   Section 5 of the Otter Derogation Licence supporting information states that no fencing will be erected that would impede Otter crossing the greenway. The lighting design, to be agreed with NPWS, will take Otter into account. |

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| 1. The EcIA does not detail the measures to be taken if post-construction monitoring shows a negative correlation to otter distribution. It also requests monitoring in Year 1.   The post-construction monitoring methodology is already included for Otter. It is difficult to prescribe measures to offset any negative impacts of the Greenway on Otter distribution, should they be identified, before understanding the cause. If negative impacts are identified during the post-construction monitoring, then remediation measures, such as additional planting or changing the lighting levels, should be implemented, in agreement with the NPWS. SDCC commits to carrying out monitoring of Otter in years 1, 2 and 3 following construction and presenting the results to the NPWS. The need for further monitoring will be determined by the results and in agreement with the NPWS. Monitoring will be undertaken in Years 1, 2 and 3 and as required in agreement with the NPWS and that the results on postconstruction monitoring be presented to the NPWS each year.     1. Suggest that there may be cumulative impacts on the badger from the Greenway and flood alleviation scheme.   There are no disused setts within the footprint of the Greenway. We have no evidence to suggest that the alleviation works will impact on active Badger setts and consider cumulative impacts unlikely.     1. The cumulative impacts assessment assesses cumulative impacts of the Dodder Greenway and other projects on Natura 2000 sites rather than biodiversity in general.   Although Table 6.3.1 of the EcIA states that cumulative impacts were assessed with regard to Natura 2000 Sites, Section 6.3 states the following:  Cumulative impacts have been assessed in relation to potential impacts on:   * Designated sites; * Rare and protected species; • Invasive alien species (IAS); and, * Sensitive habitats.      1. A conclusion on bats cannot be reached without a detailed lighting design.   The final lighting plan will be designed at detailed design stage, in accordance with the Lighting Code presented in the EcIA (Sections 5.5.4 and 7.4.9) and will be agreed with the NPWS. If the post-construction monitoring surveys determine a reduction in the distribution of any bat species, the source of the impact(s) will be determined (eg. artificial lighting/ removal of vegetation etc) and appropriate mitigation implemented which will be agreed with the NPWS.     1. The EcIA does not detail the measures to be taken if post-construction monitoring shows a negative correlation to bat distribution. It also requests monitoring in Year 1   Post-construction monitoring methodology is already included for bats. It is difficult to prescribe measures to offset any negative impacts of the Greenway on bats, should they be identified, before understanding the cause and location. If negative impacts are identified during the post construction monitoring, then remediation measures, such as additional planting or changing the lighting levels, should be implemented, in agreement with the NPWS. SDCC commits to carrying out monitoring of all bat species in years 1, 2 and 3 following construction and presenting the results to the NPWS. The need for further monitoring will be determined by the results and in agreement with the NPWS. Section 9.2 of the EcIA will be amended to reflect this.     1. There is a contradiction in the text on the distribution of Daubenton’s Bat. NPWS notes Daubenton’s have been recorded as far down as grand canal basin.   The sentence which states “Daubenton’s bat was predominantly recorded in the middle section of the Greenway, along the stretch of river from the Templeogue Bridge to Orwell Road, downstream of which it was not recorded” is an error. The area between the Luas Bridge and the Packhorse Bridge is the most downstream of the zone highlighted as important feeding/ commuting areas. During the bat transect surveys in Summer 2016, Daubenton’s Bat was recorded as far downstream as the weir on Beaver Row. The |

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| Daubenton’s Bat distribution data in the results section of the EcIA (Section 4.8) reflects our survey results from Summer 2016 only.     1. NPWS notes bat boxes should be inspected and cleaned.   The bat boxes are proposed as an enhancement measure rather than mitigation for roost loss and, therefore, ongoing monitoring is unnecessary. Self cleaning bat boxes, such as the Schwegler Universal 1FFH bat box will be used. The specification of the bat boxes will be added to the Appendix B Constraints and Opportunities Drawings at a later date.     1. Requests that All bat species, not just Daubenton’s, should be monitored.   Daubenton’s Bat are found along the Dodder Valley and known to be sensitive to light. They are associated with aquatic habitats, where they hunt close to the surface of the water. They are considered to be the most at risk species and a post-construction programme was prescribed for them only. SDCC commits to carrying out monitoring of all bat species in years 1, 2 and 3 following construction and presenting the results to the NPWS. SDCC are also undertaking surveys in 2017 to five years of data is gathered. The need for further monitoring will be determined by the results and in agreement with the NPWS.     1. The potential for increased access by people to the Glenasmole Valley SAC and the Wicklow Mountains SAC/SPA.   The footprint of the Greenway is not within any Natura 2000 site and does not propose any new access points to Natura 2000 sites. It is not anticipated that the Dodder Greenway would result in damage to the ecological receptors in the Glenasmole Valley resulting from increased footfall. Further details on access to the three Natura 2000 sites are provided below.   * Glenasmole Valley SAC – The existing road ways which constitute part of the Dublin Mountain Way along the east side of the reservoirs are fenced off by farmland and private homes. * Wicklow Mountains SPA – The nearest access point to the SPA is at the top of the upper reservoir (3 km from the Greenway). The lands within the SPA closest to the Greenway are open and exposed and would not attract people. * Wicklow Mountains SAC – The nearest access point to the SAC is at the top of the Dodder valley (5 km from the Greenway). The lands within the SAC closest to the Greenway are open and exposed and would not attract recreational users. The details in this response will be added to the EcIA at a later date.     17. The Dodder Valley pNHA/ Donnybrook Rugby Grounds and Vintners Association should be added to the list of sensitive sites in section 2.1  The comments on the EIA Screening Report have been noted. Sensitive ecological receptors in the areas listed in this submission were considered in the EIA screening as part of the Dodder Valley Corridor as a whole.    18 The cumulative impact assessment assesses cumulative impacts of the Dodder Greenway and other projects on Natura 2000 sites rather than biodiversity in general.  Although Table 6.3.1 of the EcIA states that cumulative impacts were assessed with regard to Natura 2000 Sites, Section 6.3 states the following:  Cumulative impacts have been assessed in relation to potential impacts on:   * Designated sites; * Rare and protected species; • Invasive alien species (IAS); and, * Sensitive habitats.     19. The EIA Screening should consider whether the works could constitute an offense under the Environmental Liability Directive should be considered.  The Dodder Greenway will not result in any loss of Annex I habitats. The EcIA concluded that there would be no significant loss of habitat or species listed under the Birds Directive or the Habitats Directive. Post-construction monitoring of Otter and bats will allow for remediation should any damage to the habitats of these species be identified. |

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| 1. It has been concluded (on page 24) that the cumulative impact of the Dodder Greenway in combination with the list of approved projects “is not significantly worse that any of the individual impacts associated with site preparation, construction and subsequent maintenance of the Greenway”. This is not a very clear statement and implies there is a significant impact. This sentence is intended to mean that the cumulative impacts associated with the Dodder Greenway or all other approved projects are not greater than the impacts of the other project alone, i.e. that there will be no cumulative impacts from the Dodder Greenway and any other project.      1. Will rare plants be at risk from trampling or shading to the extent they are no longer viable?   The rare plants listed in the EcIA (Section 4.6) are shade-tolerant species. All populations of these species are outside the footprint of the scheme and in areas that Greenway users either are not likely to go to or will not have access to.     1. Will the proposed bat friendly lighting definitely work?   Lighting of the Greenway will be planned at detailed design stage, in consultation with the NPWS and following the Lighting Code presented in the EcIA. As stated in the EcIA, the provision of lighting will start with the option of having no lighting at all. Light levels will be cognisant of the most up-to-date research on bat sensitivities to artificial light. In addition, post-construction monitoring will determine if the mitigation has been effective and lighting if required to reduce, if not eliminate, the negative impacts on bats.     1. If the bat friendly lighting has still to be specified has it been adequately assessed?   Lighting of the Greenway will be planned at detailed design stage, in consultation with the NPWS and following the Lighting Code in the EcIA (Sections 5.5.4 and 7.4.9). The Lighting Code is based on the most up to date research and advice currently available and has taken the sensitivity of certain species (eg. Daubenton’s Bat) to artificial light into account in the impact assessment and mitigation proposals, therefore the lighting of the Greenway has been adequately assessed.     1. If monitoring shows a decline in bats in areas with lighting what will the remedial actions be?   This will depend on the perceived cause of the decline in bats in a given area. Remedial actions could include reducing light levels, switching off lights during certain hours, screening with vegetation and reducing light spill through the installation of louvres on lights, or a combination of all of these. The results of ongoing monitoring and new technologies will be considered in the final lighting design.     1. Given the proposals for other greenways along waterways in Dublin, including the Canal and the River Liffey, have the cumulative impacts on bats due to lighting been adequately considered?   Lighting of other Greenways in Dublin has not been considered with respect to cumulative impacts. The impact of new artificial lighting on bats on the River Dodder itself will be minimal and largely screened by existing vegetation. It is anticipated that there will be no significant impact on bats as a result of artificial lighting installed for the Greenway. Postconstruction monitoring will identify any impacts and SDCC will address them through appropriate mitigation.     1. If there is a conflict between the lighting needs of cyclists and pedestrians and of bats, which will take precedence?   Lighting of the Greenway will be planned at detailed design stage, in consultation with the NPWS and following the advice stated in the EcIA. The lighting design will take bats and other wildlife into account ensuring that any potential significant impacts are mitigated for. The Greenway is intended to have a neutral to positive impact on biodiversity and the lighting design will aim to achieve this. |

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| 1. Given the current level of knowledge and the uncertainty regarding the impact of lighting on bats, could the project result in the local extinction of certain bat species? If so would this be a significant effect on the National population; would it be in contravention of the National Biodiversity Plan, Local Biodiversity Action Plans and County Development Plans; and would it comply with the EU target of no net loss of biodiversity by 2020?   The local extinction of bat species would certainly be in contravention of the biodiversity aims and targets listed. The lighting design will seek to minimise lighting on the Greenway to locations where it is necessary for public safety. The lighting design will be based on the most up-to-date guidance and in consultation with the NPWS. Post-construction monitoring will identify any reduction in the distribution and activity levels of bat species and appropriate mitigation will be adopted to reverse the impacts.     1. If the nature of mitigation measures such as fencing and the provision of artificial mammal facilities have still to be agreed with the relevant stakeholders during the detailed design stage, and the production of a CEMP has still to be completed, have these issues been considered adequately in the EIA screening?   There are no plans for the provision of fencing and artificial mammal shelters. Bat boxes and bird boxes are prescribed as an enhancement rather than as a mitigation measure. A CESCP has been prepared to address the main potential impacts at construction stage. The CEMP prepared by the contractor will include all of the requirements of the CESCP and any additional requirements.     1. Could the riparian woodland, a priority habitat, be degraded along with its rare invertebrate fauna, if so what alternatives were examined?   Riparian woodland is not an Annex I habitat. The alluvial woodland within the pNHA will not be degraded as a result of the Greenway. Riparian woodland has been retained where possible. Existing paths will be widened into grassland rather than into woodland or hedgerows.     1. Will the project, in combination with other projects, such as the proposed development at Mount Carmel, result in any degradation of the Dodder Valley PNHA and its riparian woodland with its unique assemblage of invertebrates including rare beetle species?   The Dodder Greenway, alone or in combination with other projects, will not result in any degradation of the Dodder Valley pNHA or its woodland and invertebrate fauna. The Greenway will not create additional access to the River Dodder pNHA. A range of enhancements are proposed to achieve a neutral to positive impact on biodiversity along the River Dodder corridor.     1. Suggests Lamprey should be added to item 25 of the EIA screening checklist.   Lamprey are an ecologically sensitive and protected species. However, in this case, they do not come under “high quality or scarce resources, e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals”.     1. The submission has concerns about the maintenance of Otter habitat connectivity between the Dodder, Canal and Liffey.   As described in the Otter Derogation Licence supporting information (Section 5), no fencing will be erected that would impede Otter crossing the Greenway. The lighting design, to be agreed with the NPWS, will take Otter into account.     1. Common Tern nesting at the mouth of the Grand Canal Docks   No terns were recorded nesting in Spring/Summer 2016. The Dublin City Ecological Baseline and Concept Design (DCC, 2016) described the site as a former nesting site and suggest providing a floating pontoon as a new nesting opportunity.     1. The EcIA has not quantified habitat loss as a % |

Section 4.5 of the EcIA states no Annex I habitat will be lost. Section 5.4.3 states that new paths will constitute 13% of the total Greenway area. The percentage loss of habitat, especially ecologically important habitat, would be very small with respect to the total available similar habitat in the Dodder Valley.

35. The route in some sections is not finalised- Donnybrook-Clonskeagh; Milltown-Orwell Park and routing through Milltown Golf Club is of significance as it provides a refuge for mammals. All route options under considerations at these locations were assessed for the EcIA (Section 2.2.1). The Greenway will not include fencing that would prevent Otter or Badger crossing it (Section 5 of the Otter and Badger Derogation Licence applications). Badger and Otter are both mainly nocturnal and would not be impacted by cyclists/pedestrians during the day. The final lighting plan will be designed at detailed design stage in accordance with the Lighting Code presented in Sections 5.5.4 and 7.4.9 of the EcIA and will be agreed with the NPWS.

36 Habitat loss and damage to the Dodder Valley pNHA.

Surveys undertaken in 2016 have shown that there is no riparian woodland at the point where the bridge crosses the Dodder and therefore there will be no loss of Annex I habitat. Access to the woodland on the north side of the river is currently available from Avonmore Road to the west. The bridge’s purpose is to permit access from the north side of the Dodder to the Greenway, not to the woodland on the north side of the river.

37. The potential for increased access by people to the Glenasmole Valley SAC and the Wicklow Mountains SAC/SPA.

The footprint of the Greenway is not within any Natura 2000 site and does not propose any new access points to Natura 2000 sites. It is not anticipated that the Dodder Greenway would result in damage to the ecological receptors in the Glenasmole Valley resulting from increased footfall. Further details on access to the three Natura 2000 sites are provided below.

* Glenasmole Valley SAC – The existing road ways which constitute part of the Dublin Mountain Way along the east side of the reservoirs are fenced off by farmland and private homes.
* Wicklow Mountains SPA – The nearest access point to the SPA is at the top of the upper reservoir (3 km from the Greenway). The lands within the SPA closest to the Greenway are open and exposed and would not attract people.
* Wicklow Mountains SAC – The nearest access point to the SAC is at the top of the Dodder valley (5 km from the Greenway). The lands within the SAC closest to the Greenway are open and exposed and would not attract recreational users.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 23 – David Cotter

This submission relates to the following issues:

1. Questions the decision of South Dublin County Council to go out to public consultation on 6no. different projects over the summer period (peak holiday time). Request that Part 8 consultations are staggered throughout the year and avoid the summer holiday period. Noted.

1. Suggests alternative design solutions be considered for cyclists using sections of the Greenway that are proposed as ‘shared street’ as this has the potential to create confusion with regards to right of way particularly if not sign posted correctly. Alternatives such as advisory cycle lanes with different coloured surfacing would be more familiar to users. Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The

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| Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.     1. Suggest that where footpath and cyclist are shared they should be clearly distinguished with a different colour.   Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.     1. Additional cycle facilities should be provided, including advisory lanes (different colour) on all arms through the junction, at Rathfarnham Junction.   The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction.     1. Concern raised with regards to the removal of kissing gates as this provides easy access for motorbike users which are a danger to other users.   Noted. It is intended that all entrances to the Greenway, both existing and proposed will be upgraded to be universal accessible for all legitimate users of the Greenway. It is noted that kissing gates are seldom successful in precluding access by motorbikes and other motorised users. These users tend not to be deterred by kissing gates and often go to extreme ends to gain access to parks and open space. It has also been established that kissing gates can exclude legitimate users such as some cyclists, buggies and some wheelchair users.  Prevention of illegal access will be further considered at the detailed design stage; however it has been the experience in the past that the removal of kissing gates, in tandem with the provision of improved facilities, and the increased use by legitimate pedestrian and cycle users can often discourage and remove existing illegal use by motorised vehicles.     1. Request for memorial plaque to David Allen (Comedian) in the area around Cherryfield house.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Request for a conservation plan to be prepared in relation to sites/areas of historical and cultural significance, and provision of photo/illustrations/information panels at key locations along the route.   Noted. While there are no impacts proposed to protected structures or national monuments; it is accepted that the Greenway will pass by areas of high heritage value and interest. It is proposed that the landscape plan will incorporate detail design that will be sensitive to these areas and sites and the signage and branding strategy will ensure that these areas are promoted and presented to the public.  The proposals for the landscape will include a general ‘route design’ that will respond to the environmental conditions of each area along the Dodder but will ensure a consistent treatment in terms of design language, materials etc. At various locations such as entrances, special areas of heritage interest, social importance, prominent viewing areas, areas of outstanding beauty or of natural and ecological interest etc. will require an individual landscape treatment that is bespoke to that area. While elements of the design language will remain consistent with the overall route; treatment will ensure that the area retains its special status and is appropriately highlighted.     1. Request that all materials used should be of the highest standard possible in terms of the environment and sustainability, e.g. recycled metal, recycled plastic fittings and furniture, FSC certified timber, eco-cement, recovered hard surfacing materials etc.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage. |

9. Request the inclusion of additional native trees within the landscape proposals eg: the native Arbutus unedo could be planted for a dramatic evergreen rather than Quercus ilex. Also Ilex aquifolium (Holly) and Taxus baccata (Yew) could be used in the planting schemes Noted and will be considered as part of an overall Landscape plan at the detailed design stage

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 24 – Eric Conroy**    This submission relates to the following issues:   1. Supports the delivery of the Dodder Greenway Noted.      1. Requests that the Greenway path should be kept as narrow as possible and should be as low-engineered as possible to minimise damage/removal of biodiversity, hedgerows, trees etc Noted.      1. Requests that where space permits cyclists and pedestrians should be segregated.   Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. In this regard it is intended to initiate an education and awareness campaign as part of the delivery of the Dodder Greenway.     1. Suggests that the Greenway route need not hug the line of the dodder excessively but should utilise the surrounding space to provide good linear route to get around south Dublin by bike.   Noted.   1. Request that the scheme minimises the use of kissing gates (or not use at all)   Noted. It is intended that all entrances to the Greenway, both existing and proposed will be upgraded to be universal accessible for all legitimate users of the Greenway. It is noted that kissing gates are seldom successful in precluding access by motorbikes and other motorised users. These users tend not to be deterred by kissing gates and often go to extreme ends to gain access to parks and open space. It has also been established that kissing gates can exclude legitimate users such as some cyclists, buggies and some wheelchair users.  Prevention of illegal access will be further considered at the detailed design stage; however it has been the experience in the past that the removal of kissing gates, in tandem with the provision of improved facilities, and the increased use by legitimate pedestrian and cycle users can often discourage and remove existing illegal use by motorised vehicles. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 25 – Helen Nicholson Hughes

This submission relates to the following issues:

1. Concerns raised regarding the removal of the left turning slip from Old Bridge Road onto Butterfield Avenue resulting in a left turn restriction.

Noted. The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction. The current design proposal does not intended to ban this left turning movement, only the left slip lane will be removed. The left turn movement will be controlled via the traffic signals.

1. The removal of on street parking has been highlighted as an issue for visitors to the area. The dwellings along Butterfield Avenue possess adequate in curtilage private car parking spaces. Visitors to the area should use public car parking spaces or dedicated spaces provided by the facilities/businesses being attended. Opportunities for the provision of suitable public car park facilities in close proximity to this area and the Dodder Greenway will be examined at detailed design stage.

1. Concerns raised regarding the capacity of the Butterfield Avenue - Ballyroan Road junction

Noted. The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction. A junction analysis has been carried out on the current design proposal for the Butterfield Avenue - Ballyroan Road junction and the results indicate that there is adequate capacity within the junction to cater for current and future requirements.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 26 – David Kennedy (Thomas Davies GAA)

This submission relates to the following issues:

1. Welcomes the proposed Dodder Greenway.

Noted.

1. Requests that an alternative route for the Dodder Greenway, for the section proposed along Kiltipper Rd, should be identified along the banks of the Dodder River through the privately owned lands in collaboration with SDCC and the existing landowners (as recommended by the Dodder Greenway Feasibility Study 2013). Suggests that preliminary discussions have been held between the landowners and that they believe a route can be made available.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes for the section along Kiltipper Road. Due to a variety of constraints at that location; Kiltipper- the lands adjacent to the river are privately owned and contain Annex I habitat (Tufa forming springs and Alluvial Woodland) the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a reconsideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 27 – Mary Dodds

This submission relates to the following issues:

1. Concerns regarding the removal of on street parking on Butterfield Ave would have on existing business.

The dwellings along Butterfield Avenue possess adequate in curtilage private car parking spaces. Visitors to the area should use public car parking spaces or dedicated spaces provided by the facilities/businesses being attended. Opportunities for the provision of suitable public car park facilities in close proximity to this area and the Dodder Greenway will be examined at detailed design stage.

1. Concerns regarding right turners onto Anne Devlin Road causing traffic build up on Butterfield Avenue.

Butterfield Avenue at present operates a single carriageway road. The proposed scheme does not seek to make any changes to this and it is intended to maintain it as a single carriageway road.

1. Request to look at an alternative Greenway Route to Butterfield Avenue

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes for the section along Butterfiled Avenue. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 28 – Michael Sheedy

This submission relates to the following issues:

1. Request for relocating the toucan crossing on the Firhouse Road further west to facilitate the existing bus stop and additional footfall.

Noted and will be considered as part of the detailed design stage

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 29 – Yvonne Jackson / Mary Stack (Failte Ireland)**    This submission relates to the following issues: 1. Supportive of the proposed development Noted.    2. Suggest the proposed scheme should consider the 4 S’ for Cycling Tourism in the design and implementation of the Dodder Greenway.    • Scenery - beautiful scenery and landscape which needs to be varied • Segregated – traffic free |

* Safe – flat surfaces and good services
* See and do – lots of activities, attractions and interesting villages Noted and will be considered as part of the detailed design stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 30 – Joann Gillen**    This submission relates to the following issues: 1. Welcomes the proposed Dodder Greenway Noted.    2. Concerns raised in regards to the lane widths at the Butterfield Avenue junction with Ballyroan Road.  Noted. The Part 8 provides for a preliminary design for the junction and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route and for the junction. Existing lane and footpath widths have been adjusted in order to integrate the cycle lane. A junction analysis has been carried out on the current design proposal for the Butterfield Avenue - Ballyroan Road junction and the results indicate that there is adequate capacity within the junction to cater for current and future requirements. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 31 – Cllr Dermot Looney**    This submission relates to the following issues: 1. Welcomes the proposed Dodder Greenway Noted.     1. Request that cyclist and pedestrian are segregated along sections of the Greenway Route that are proposed within Parklands where adequate room is available.   Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment. In this regard it is intended to initiate an education and awareness campaign as part of the delivery of the Dodder Greenway.     1. Requests that a link be provided at Mount Carmel through the M50 underpass to link with the Tallaght to Templeogue cycle route. While this link does exist it is substandard, narrow and in need up repair / upgrade.   Noted. A link from the Greenway at Balrothery Weir to the Tallaght to Templeogue Cycle Route will be included at the detailed design stage, subject to ecological and environmental considerations. Works to the bridge will be considered as part of the scope of that link.     1. Requests that all underpasses along the proposed route are well maintained, wide and adequately lit in the interest of safety.   Noted and will be included as part of the detailed design stage. |

1. Requests that linkages from to route to the many examples of heritage along and in closed proximity to the route are well signposted and route should include for provision of information through all online, app and printed maps.

Noted and will be considered as part of an overall Signage and Wayfinding strategy plan at the detailed design stage.

1. Requests that a reduced speed limit for Kiltipper Road be considered along with further enhancement of traffic calming proposals to ensure cyclist safety when sharing the carriageway with vehicular traffic.

The Part 8 provides for a preliminary design for the Kiltipper Road and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. We will consider the proposals outlined such as planters and ramps, the critical vertical design of the proposed traffic ramps, and a speed limit of 30 km/h limit, clear 30 km/h intermittent road markings and signage, and rigorous follow-up speed monitoring after construction and others as part of the detailed design stage.

1. Requests that Dog Walkers are be facilitated with areas away from the cycle/pedestrian track near Cherryfield/Knocklyon/Firhouse which will allow them exercise their animals. Noted. A dogs off-leash area can be considered at the detailed design stage; subject to locational considerations and ecological/ environmental assessment.

1. The environmental sensitivities of the river and the plant and animal life living in and adjacent to it must be protected during construction.

Noted. NPWS will be consulted throughout the detailed design stage. The Contractor will be required to submit all of the relevant plans, programmes and method statements for approval prior to commencement, including a CEMP. South Dublin County Council will also appoint an Ecological Clerk of Works (ECoW) to oversee the implementation of the CEMP/CESCP and all other mitigation measures and ecological enhancements.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 32 – Keith Scanlon

This submission relates to the following issues:

1. Questions the findings of the EIA and AS [This is referring to the EIA Screening and AA Screening Report] that there will not be impacts of national or international scale as a result of the Greenway.

The EcIA and AA Screening followed best practice guidelines as cited in the texts. Following NRA/ TII Guidelines for Assessment of Ecological Impacts on National Roads (2009), which defines receptors, both species and habitats, of local, county, national and international importance, none of the identified Key Ecological Receptors (EcIA Section 5.3) can be described as of national or international importance in this regard. The Greenway has been designed with biodiversity in mind and with the aim of having an overall neutral to positive impact on biodiversity. A suite of protective measures, including: mitigation to protect the river habitat during construction and operation; ecological enhancement measures proposed to increase the quality of habitats in the Dodder Valley; post construction monitoring of bats and otter; and ongoing consultation with NPWS during detailed design stage have been submitted as part of the planning application. Avoidance of sensitive habitats and in stream works have further reduced the impacts of the greenway at the earliest possible stage.

1. Raises concerns that the surveys assessed the river in discreet parcels of land rather than as a whole

The Ecological and Environmental Assessment were carried out of the whole watercourse and route of the Greenway as detail in the EcIA and the potential impacts on the habitats and species were assessed based on the populations with the entire river corridor.

1. Requests that SDCC engage with named stakeholders and pilot the Urban River Survey (URS) methodology to monitor the River Dodder.

SDCC welcomes positive actions to monitor and improve the quality of the River Dodder Corridor and SDCC would be happy to engage with stakeholders in the future. The water quality of the River Dodder has been monitored since 2004 by the EPA through Ireland’s commitments under the Water Framework Directive.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

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| **Submission no. 33 – Dermot Mc Dermot – Kiltipper Woods Care Centre**    This submission relates to the following issues: 1. In favour of the introduction of Greenway Noted.     1. Objects to the proposal to narrow Kiltipper Rd to 6m wide carriageway as the road is already too narrow for passing cars and this has already led to damage to cars. In addition emergency service vehicles frequently use this road to access the Kiltipper Woods Care Centre and any further hindrance of access would seriously impact on the health of the 117 residents of Kiltipper Woods Care Centre.   The Part 8 provides for a preliminary design for the Kiltipper Road and the area adjacent. A Road Safety Audit and a detailed traffic survey will inform and final design/layout for that section of the route. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. We will consider the proposals outlined such as planters and ramps, the critical vertical design of the proposed traffic ramps, and a speed limit of 30 km/h limit, clear 30 km/h intermittent road markings and signage, and rigorous follow-up speed monitoring after construction and others as part of the detailed design stage.     1. Objects to the proposal to use the Kiltipper Woods Care Centre access road as a cycleway. Submission states that he right of way that exists over the land of Kiltipper Woods Care Centre is expressly by foot only, as a result of this SDCC do not have permission to construct a cycleway across the lands of Kiltipper Woods Care Centre. Submission considers that danger that speeding cyclists would pose to the residents of Kiltipper Woods Care Centre is too great to allow the use of this right of way by cyclists.   Noted. Further investigation is required with regards to existing rights of way and Dodder Greenway may be required to be pedestrian only (or cyclist dismount) along this section of the route with alternative route for cyclists to be explored as part of the further detailed design stage. |
| 1. Requests that further consideration given in the proposal to the prevention of anti-social and criminal behaviour which has become a frequent occurrence as a result of the presence of Kiltipper Park.   Noted. The provision of CCTV and some element of additional Public Lighting within this area will be considered as part of the detailed design stage.     1. Objects to the proposed location of the car park adjacent to Kiltipper Woods Care Centre. Submission states that the right of way that exists over the land of Kiltipper Woods Care Centre is expressly by foot only, as a result of this SDCC do not have permission to drive along the access road Kiltipper Woods Care Centre.   Noted. Further investigation is required with regards to existing rights of way and Dodder Greenway may be required to be pedestrian only (or cyclist dismount) along this section of the route with alternative routes for car owners will be explored in consultation with the landowner as part of the detailed design stage.   1. Submission states that many of the above issues would be avoided if an alternative route was used for the Greenway and that landowners adjacent to the Dodder river between Kiltipper Park and the Old Bawn Bridge can provide for this alternate route along the banks of the Dodder river.   Noted. The Dodder Greenway as currently proposed has the potential to deliver a high quality greenway of international renown linking from Boharnabreena reservoir to Grand Canal Dock providing:  Walking and cycling route connecting parkland along the route; Enhanced Ecological Corridor;  Amenity for Tourists and Local Businesses;  Driver of Economic Development;  Supporting uptake of sustainable transport for leisure and commuting purposes    Opportunities to explore the provision of additional sections of Greenway to support and compliment the proposed route can be explored as part of future detailed design stage, should the opportunities arise. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 34 – John Clinch (BGPG)

This submission relates to the following issues:

1. Objects to the proposed bridge at Orwell Park and considers that the proposed design is visually obtrusive and will have significant impacts and considers that in the absence of a completed Greenway design for DCC, the proposed Orwell Bridge is premature and pre-empts the DCC Greenway Part 8 design process.

The design of the proposed Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the

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| minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.    The proposed bridge at Orwell Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    While the above considerations have an impact in terms of the requirements for the bridge design, the designs were carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.    The route passes through Orwell Park – the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.    The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees would require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.    Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography. The design and layout of the bridge allows views to Ely Gate to be framed from the bridge. It is considered that the proposed bridge with the new proposed plaza area on Dodder Road Lower will be a positive visual impact in the local landscape and a feature for the Dodder Valley.    It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. The delivery of any combination of the feasible Greenway routes within Dublin City Council and Dun Laoghaire-Rathdown County Council areas do not preclude universal access to Orwell Park from South Dublin County.    3. Submission considers that the proposed drawings for Orwell Bridge appear to be outside terms of Section 85 which only refers to bridges, not paths. |

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| The Orwell Bridge structure is within 50m of the river bank as per the Section 85 agreement. The route ties into the adjacent footpaths using a sloped embankment in order to fully comply with accessibility requirements and best practice with regard to universal access design requirements. The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    4. Submission considers that the proposed bridge design at Orwell Park would be visually obtrusive and dominant, and seriously diminish the existing landscape character of this part of the Dodder river, the existing footbridge, the green space between river and road, the Protected Structure of Ely Gate, and the small long established Orwell Park and environs and would contravene policies in all three Development Plans.   1. The Dodder is a Conservation Area in DCC. This would contravene Policy CHC4 of the DCC Development Plan 2016-22, as it would ‘Harm the setting of a conservation area’ and ‘Constitute a visually obtrusive or dominant form’. 2. The Dodder is zoned HA-DV in SDCC ‘To protect and enhance the outstanding character and amenity of the Dodder Valley’. This would contravene Policy HCL10, Objectives 1 and 7 of the SDCC Development Plan 2016-22, as it would fail to be ‘designed and sited to minimise environmental and visual impacts’, and fail to ‘preserve the amenity value of the (Dodder) river valley including its landscape value, views or vistas of the river valley, and its biodiversity value. This would contravene Policy LHB25 (Rivers and Waterways) of the County Development Plan 2016-22 which states that ‘It is Council policy to maintain and protect the natural character and ecological value of the river and stream corridors in the county’ and would fail to ‘Have no negative effects on the distinctive character and appearance of the waterway corridor and/or the characteristic and landscape elements of the specific site and its context’     The design of the proposed Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered.    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010    The proposed bridge at Orwell Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. |

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| The route passes through Orwell Park – the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.    The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees would require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.    Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography. The design and layout of the bridge allows views to Ely Gate to be framed from the bridge. It is considered that the proposed bridge with the new proposed plaza area on Dodder Road Lower will be a positive visual impact in the local landscape and a feature for the Dodder Valley.    The details provided of the bridge with regard to the cross sections and location are for preliminary design stage therefore it is considered that due to the proximity of the proposed Orwell bridge to the rear site of a Protected Structure the overall design, materials and finishes should take cognisance of the adjacent protected structure ensuring that the overall visual effect of the bridge at this location is kept to a minimum and this can be achieved by good overall design and use of appropriate materials. Details of the proposed Orwell bridge will be referred to both Councils Architectural Conservation Officers for comment and agreement prior to final design. The council agrees to further consult with the relevant stakeholders prior to completion of the final design.      5. The submission considers that access could be provided with minor amendment of the existing nearby footbridge. There is an existing foot/cycle bridge already in this location to Orwell Park of just some 15 m length. The aim of improved access to the Park would be better served by amending the camber of the bridge at either end to provide universal access, and a more manageable slope (1 in 15) could be achieved.    It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements. Options with regard to expanding or amending the existing bridge; which was proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out. The current bridge proposal was considered the best fit with regard to the constraints within the location.    The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona |

Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.

It is intended to retain the existing bridge at Orwell Park as it provides pedestrian access for the nearby school.

6. Submission notes that there is a statement in Route Drawing No. 22, and repeated in the Ecological Impact Assessment, to the effect that ’Existing footbridge to be removed at a later stage’. It is understood this may be a ‘mistake’, but for the avoidance of doubt, it is considered unacceptable.

Noted. This is a typographical error on the drawings. It is intended to retain the existing bridge at Orwell Park as it provides pedestrian access for the nearby school.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 35 – Eamon O’Neill

This submission relates to the following issues:

1. Pedestrian and Cyclist should be segregated as part of the proposed Dodder Greenway. It is inappropriate to mix cyclists with other greenway users such as couples and groups, parents with children, people walking with dogs both on and off lead, as this leads to frustration on both sides.

The proposed Dodder Greenway is designed as a universally accessible route and a shared pedestrian and cyclist route. It is not designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 36 – Thomas O’Neill

This submission relates to the following issues:

1. Concerns raised regarding the creation of a shared street on Kiltipper Road given the level of traffic on the road.

The proposed design for Kiltipper road includes a number of design measures including, traffic calming ramps, a narrowed carriageway formalised kerblines, new footpaths, formalised on street parking, signage, which will allassist the reduction in carriageway speeds therefore creating a traffic calmed environment to be shared with cyclists. Carriageway speeds to be reduced to 50kph.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 37 – Gregory Devlin

This submission relates to the following issues:

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| 1. The route east of Fort Bridge deviates too far north from the river to avail of its full amenity value.   The Greenway follows the route of the existing path between the Old Bawn Road and into the Dodder Valley Park. The existing paths along the river will still be accessible to users who wish to take the route closer to the river.     1. The walkway west of Rathfarnham Br. on the north side of the road is too wide (space for pedestrians only and a shared pedestrian/cyclist space).   Noted. A Landscape Plan will be carried out as part of the detailed design stage and will include consideration of these items. The proposals for the landscape will include a general ‘route design’ that will respond to the environmental conditions of each area along the Dodder but will ensure a consistent treatment in terms of design language, materials etc. At various locations such as entrances, special areas of heritage interest, social importance, prominent viewing areas, areas of outstanding beauty or of natural and ecological interest etc. an individual landscape treatment will be proposed that is bespoke to that area. While elements of the design language will remain consistent with the overall route; treatment will ensure that the area retains its special status and is appropriately highlighted. It is intended that these proposals, while improving the environment of the Dodder Valley, will also represent value for money and be hard wearing and robust. The current proposals for this area will create a new entrance to the parkland at this location and treatment will be considered further at the detailed design stage.     1. Request that further consideration needs to be given to the planning and design of the Orwell Park river crossing, including the alignment of the bridge, if it is necessary.   The design of the proposed Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010    The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.    The proposed bridge at Orwell Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed |

bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The route passes through Orwell Park – the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.

The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees would require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.

Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography. The design and layout of the bridge allows views to Ely Gate to be framed from the bridge. It is considered that the proposed bridge with the new proposed plaza area on Dodder Road Lower will be a positive visual impact in the local landscape and a feature for the Dodder Valley.

4. There is an opportunity to form a walkway on the north side of the river between Rathfarnham Br. and Orwell Br., providing a loop walk. The fact that the north bank of the river is within the DCC area should not prevent SDCC developing the loop walk suggested The area on the north side of the river between Rathfarnham Bridge and Orwell Bridge is an undeveloped woodland that provides refuge for protected species including badger and otter. Development of a walkway in this area would displace these species that already have limited areas to shelter within the Dodder corridor.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 38 – Elaine Edmonds (TII)

This submission relates to the following issues:

1. TII are seeking a more detailed interface with the M50 underpass. Upgrade suggestions of the existing underpass have been suggested.

Noted and will be considered at the detailed design stage. SDCC will review the interface with the M50 underpass and update the proposals as necessary.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 39 – Denise Delappe (Parkway RA)

This submission relates to the following issues:

1. Concerns raised regarding the number and proximity of toucan crossings on the Old Bawn Road.

One new toucan is proposed along the Old Bawn Road. The new crossing will be synchronised with the existing junction lighting to avoid any additional congestion along the Old Bawn Road.

1. Interface with the Dodder Park carpark referenced.

The interface with the Dodder Park carpark has been aligned in accordance with the granted Part 8 for this infrastructure.

1. The installation of litter bins has been requested.

Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 40 – Tony O’Reilly – Kilvere RA

This submission relates to the following issues:

1. Objects to the proposed Dodder Greenway route adjacent to Kilvere on the following grounds.

1. Proposed new bridge at Riverside Cottages will lead to increase in traffic though Kilvere including pedestrians, cyclists and Motorbikes. Potential for increased anti-social behaviour. The proposed Greenway route is for non-motorised traffic only. The use by motorbikes will be precluded by a variety of design measures, enforcement and passive surveillance. The Council has found in the past that the provision of popular walking and cycling routes tends to provide a level of passive surveillance that decreases anti-social behaviour in that area. The proposed bridge at Riverside Cottages is intended as a link to the Greenway route from Templeogue and it is hoped that the users of the route will visit the village and support the local economy. The design of the route through Riverside and Kilvere has been carefully thought out in order to decrease the impact on nearby houses as much as possible and to ensure the Architectural Conservation Area is not adversely impacted by the proposals. The proposed link will also provide a pleasant walking and cycling route for local residents to access facilities in the local area.

1. Lack of parking provision along Butterfield Avenue will lead to increased parking with Kilvere estate which is already an existing problem for residents.

Noted. New interventions will be considered at the detailed design stage to decrease the impact on increased car parking.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 41 – Marian Gillegan

This submission relates to the following issues:

1. Requests that all new proposed bridges are wheelchair friendly and that the proposed route allows for wheelchair use.

Noted. The proposed bridges along the route, including the proposed bridges at Orwell Park and Bushy Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the feasibility stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. It was a specific aim of the Greenway route design, including the design of the proposed bridges, to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. In this respect existing entrance barriers and gates within South Dublin County Council (e.g. at Kiltipper Park) are also being reviewed to ensure universal access is achieved.

1. Request that the area opposite No.9 Dodder Rd Lower is re landscaped to include lower growing shrubs and flowers at it has now become overgrown including a very large beech tree which is out of scale with the surrounding area.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 42 – Helen Flynn (Duplicate see Response to submission no.14)

This submission relates to the following issues:

1. Concerns have been raised in respect of car parking facilities in front of the cottages (namely Briar and Bramble Cottages) on Kiltipper Road.

One additional parking space will be provided directly in front of the cottages therefore providing five car parking spaces in total. These parking spaces cannot be dedicated to the cottages as they will be in a public space. There is insufficient space to provide any additional road side parking spaces in this area. Six road side car parking spaces have been provided further west along Kiltipper Road. Noted. A number of residents have made submissions to the public consultation process as appropriate. A number of landowners have also discussed proposals with SDCC during the Part 8 process. Issues raised will be considered and addressed with the residents during the detailed design stage

1. Concerns regarding vehicles exiting the cottages have been raised.

Adequate space and sight lines exist and will be maintained for vehicles exiting the cottages.

1. Maintenance of the proposed grass verge in front of the dwelling is being questioned. The detail of the verge will be further considered at the detailed design stage in consultation with the adjacent resident.

1. Existing calming ramps causing disturbance, request to locate the new ramps away from the existing cottage dwellings.

Noted. This will be considered as part of the detailed design stage. It is intended that proposed calming ramps are to be located away from the existing dwellings.

1. Queries if proposed ramp design will be sufficient to reduce speed limits and have a calming effect on Kiltipper Road.

Noted. This will be considered as part of the detailed design stage. Ramps will be designed and installed in accordance with the recommended guidelines in order to create a speed calmed environment.

1. Issues relating to littering and rubbish and concern regarding increased littering with new path.

Noted. Maintenance is outside the scope of the current Part 8 requirements; however the maintenance of the Greenway will be of high importance to the successful delivery and operation of the Dodder Greenway. An operational and maintenance strategy will be prepared to ensure successful delivery in this regard.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 43 – Niall Morton (Mortons Pub)

This submission relates to the following issues:

1. Raises objection at not being contacted directly with regards to the proposed Dodder Greenway given the proximity to his business.

Noted. Statutory Public Consultation was carried out in accordance with the requirements of the Part 8 process. Non-Statutory Consultation was also carried out. Details of consultation are set out in Section 1.3 of the Part 8 Report.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 44 – Paddy Marron (Rathgar RA)

This submission relates to the following issues:

1. Welcomes the proposal.

Noted.

1. The design appears to promote and encourage commuter cycling along its route.

Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

1. It is requested that the Park Areas and Landscape of the route be respected as a local amenity.

Noted.

1. Concern regarding SDCC proceeding their design in advance of DCC and DLRCC.

It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. The delivery of any combination of the feasible Greenway routes within Dublin City Council and Dun Laoghaire-Rathdown County Council areas do not preclude delivery of the proposed Greenway route within from South Dublin County. SDCC will continue to liaise with DCC and DLRCC through the design process in order to achieve a coherent and consistent Greenway Route design. A detailed pallet of finishes and street furniture will be concluded for the entire route prior to construction. A Steering Group is currently being established including representatives across all the Authorities, this will ensure consistency of design approach along the full length of the final Dodder Greenway at the detailed design stage.

1. The impact of the proposed bridge at Bushy Park on the existing environment is questioned. Can the existing bridge be upgraded to facilitate universal access?

The existing bridge at Bushy Park is to be retained. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Bushy Park was of an older vintage and was not compliant with current universal access requirements. Options with regard to expanding or amending the existing bridge; which was proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out.

The current proposal was considered the best fit with regard to the constraints within the location. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.

The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.

6. Concerns raised regarding the routing of the Greenway through Orwell Park and its impact on the Park.

Noted. The design of the proposed Greenway through Orwell Park and the Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, existing trees, existing riverside vegetation, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered.

With regard to the proposed route through Orwell Park; the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.

The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees would require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.

The proposed bridge at Orwell Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. The delivery of any combination of the feasible Greenway routes within Dublin City Council and Dun Laoghaire-Rathdown County Council areas do not preclude universal access to Orwell Park from South Dublin County.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 45 – Dominic Finnegan (Thomas Davis GAA)

This submission relates to the following issues:

1. The exclusive use of the footpaths along Kiltipper Road for pedestrian traffic is requested.

Noted. It is intended that the proposed 2m wide footpath be used for pedestrian traffic only. There should be no cycle traffic on the footpath.

1. Concerns with regard to how the 6m wide carriageway has been achieved at the Glenville P&P Club Entrance.

It is intended to construct the realigned road and footpaths between the existing land boundaries within SDCC ownership. All works, whether construction or maintenance, carried out within this area will be the responsibility of the Local Authority.

1. The club notes the proposal to integrate a new raised ramp entrance. The club has no objection but requests that they be consulted on the details prior to construction. Noted. SDCC will consult with the Club prior to finalising the entrance details.

1. Security concerns raised as a result of increased pedestrian traffic on the Kiltipper Road. Enhanced security measures requested for landowners.

Noted. SDCC cannot provide additional security measures to private land owners.

1. The Club requests that the Toucan Crossing proposed adjacent its lands be substituted for a pedestrian crossing.

Noted. A wide pedestrian crossing will be facilitated at this location.

1. The club requests that the proposed public lighting design be sufficient to cater for the 3 no. club car parking areas.

The final lighting plan for the overall route will be designed at detailed design stage, in accordance with the Lighting Code presented in the EcIA (Sections 5.5.4 and 7.4.9) and will be agreed with the NPWS. The public lighting design will be designed to light the Dodder Greenway route specifically. SDCC cannot be responsible for lighting of third party lands.

1. The proposed Greenway route at the entrance to Kiltipper Woods Nursing Home traverses lands currently owned by Thomas Davis GAA Club.

Investigations by SDCC do not support this claim. The Council will further liaise with the landowner in this regard

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 46 – Redmond O’Hanlon (Dodder Anglers Association)

This submission relates to the following issues:

1. Notes that there are significant infestations of Japanese Knotweed upstream from the proposed route, on the Dodder and its tributaries. These will continue to spread into cleared areas if not managed.

The distribution of Japanese Knotweed and other invasive species was surveyed and mapped as part of the ecological surveys undertaken in 2016. To be successful, the control of these species needs to be undertaken on the entire river and its tributaries and ongoing surveys and monitoring are required. The Greenway application recognises the extent of the invasive species problem and SDCC will treat infestations appropriately where they clash with the Greenway itself.

1. Sections of the river are tunnelled by vegetation, obscuring viewing opportunities and preventing light penetration into the river channel, which is detrimental to invertebrates and fisheries. Selected areas of overgrowth should be cut back to mitigate the amenity and ecological effects of tunnelling.

In assessing the impacts of the Greenway and planning mitigation and enhancement measures, there are instances where a measure to promote one species conflicts with the aims to preserve another. Light penetration of the river channel will as the submission states, benefit invertebrate and fish populations, however this vegetation also screens out artificial light and noise and reduces the levels of disturbance associated with increased access by people and dogs. SDCC would welcome future proposals by the Dodder Anglers Association to selectively remove vegetation subject to considerations being given to other species including bats and otter.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 47 – John Stanton (Dodder Valley Association)

This submission relates to the following issues:

1. Human Activity - It is felt that there is a lack of vital information relating to existing human activity along the River Dodder which would inform the design.

The intention of the Greenway is to create a continuous public amenity through the Dodder Valley. Traffic and usage counts have been conducted to date, these will be compared to actual counts once the project is completed.

1. It is suggested to retire the existing pedestrian bridge from Lower Dodder Road to Orwell Park.

Noted. This is a typographical error on the drawings. There is no intention to remove this bridge as part of this scheme.

1. A request to upgrade the sewer pipes along the river have been put forward.

The upgrade of the sewer network along this route does not form part of this scheme, however necessary upgrades should be brought to the attention of Irish Water.

1. It is noted that the proposed Greenway shows no record of existing or proposed utilities and services.

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| There was no necessity to illustrate utilities and services on the preliminary design. Impacts with existing and proposed utilities and services will be dealt with during the detailed design stage.     1. The lack of hydro power proposals along the scheme have been highlighted.   Noted. A very early stage feasibility study was carried out county wide with regard to the possibility of such facilities. Should that project proceed and deemed viable it may be incorporated into the detailed design stage for the Dodder Greenway Part 8.     1. Ownership of the maintenance of the proposed scheme has not been outlined.   Noted. Maintenance is outside the scope of the current Part 8 requirements; however the maintenance of the Greenway will be of paramount importance to the successful delivery and operation of the Dodder Greenway. An operational and maintenance strategy will be prepared to ensure successful delivery in this regard.     1. Access for emergency vehicles and the presence of safety equipment has been questioned. A detailed safety audit of the proposed scheme will be carried out at detailed design stage and any necessary safety measures raised will be incorporated into the design.      1. Consideration should be given to the location of litter bins and dog foul bins along the route.   As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan the at detailed design stage.     1. Particular consideration should be given to redesigning the landscape at the bottom of Cherryfield Park.   A specific landscaping plan has been designed for the route, however this area shall be considered.     1. A request for outdoor exercise equipment and distance markers has been put forward.   Both exercise equipment and distance markers shall be considered at the detailed design stage of the project.     1. Dodder Invasive Plants   Noted. The control of invasive species should be river catchment basis and would require significant financial resources. Invasive species including Japanese Knotweed and Himalayan Balsam are found in locations along the full length of the River Dodder. The preliminary design stage for the Greenway mapped the location of invasive species along the length of the route. This information was shared with SDCC operations and maintenance section and with DCC. A county wide mapping and control regime is underway currently within the operations and maintenance section of SDCC. The mapping information will allow a construction plan to be implemented to ensure the construction of the Greenway does not result in the spread of Invasive Species.     1. Safety concerns over the Fort Bridge crossing have been raised.   A complete safety audit on the junction and bridge crossing will be conducted prior to construction.     1. Requests for a river and circular path around Kiltipper Park have been put forward. This request is outside the scope of the current Part 8. Council Plans to progress Kiltipper Park as a separate Part 8.      1. Concerns raised over the proximity of the proposed trees to the Greenway path.   The proposed trees are a small addition to the number of existing trees in the Park and therefore it is felt that there will be a small impact from the trees. |

1. Concerns raised over the interface of the Greenway with Kiltipper Woods Nursing home The proposed route here has followed the existing Dublin Way path as the adjoining steep embankments make an alternative route quite restrictive. The installation of a chicane at the end of the path to restrict flows will be considered.

1. Balrothery Weir should be given special treatment.

Noted. The Landscape Plan that will be carried out as part of the detailed design stage will include consideration of these items. The proposals for the landscape will include a general ‘route design’ that will respond to the environmental conditions of each area along the

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| Dodder but will ensure a consistent treatment in terms of design language, materials etc. At various locations such as entrances, special areas of heritage interest, social importance, prominent viewing areas, areas of outstanding beauty or of natural and ecological interest etc. will require an individual landscape treatment that is bespoke to that area. While elements of the design language will remain consistent with the overall route; treatment will ensure that the area retains its special status and is appropriately highlighted. An overall signage and branding strategy will also be prepared for the Greenway that will highlight these areas of interest.     1. Delineation of the Dodder River should be indicated at M50 level.   This project cannot interfere with the workings of the M50. TII have strict guidelines for motorways which must be adhered to along the M50.     1. The pathways/Greenway from Spawell Road through Cherryfield Park need to be examined to provide a safe passage for pedestrians and cyclists.   The underpass in this location will be upgraded to match in with the rest of the path. CCTV and lighting shall be provided to the underpass. This will be further examined at the detailed design stage.     1. Request to redesign the landscape at the bottom of Cherryfield Park. This will be further examined at the detailed design stage.      1. Concern raised over lack of riverside walk or access to Kilvere Park under Old Bridge Road.   Considerable engineering intervention would be necessary to bring the Greenway along this route, therefore it was deemed more appropriate to utilise the existing, recently installed, infrastructure along the Firhouse Road to connect the route.     1. A request for a new pedestrian entrance into the top of Kilvere Park has been put forward.   Noted. A new pedestrian entrance will be reviewed and considered at the detailed design stage.     1. Request to install a cycle ramp and improve drainage at Springfield Ave. Bridge.   Noted. The ramp at this location will be constructed so that it is universally accessible. The drainage of the underpass will be reviewed and rectified at detailed design stage.     1. Stepping stones requested at the estuary of the Owendoher Stream.   Noted. Stepping stones will be reviewed at detailed design stage, subject to ecological topographical and other constraints.     1. Concerns raised over the retirement of the existing footbridge at the entrance to Orwell Park.   There is no intention to retire the existing footbridge under this scheme.     1. Concerns raised over resurfacing the existing path on Lower Dodder Road.   Resurfacing of this path will be reviewed and resurfaced as required in order to provide a safe Greenway. |

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 48 – Victoria White (Dodder Action Group)

This submission relates to the following issues:

1. The best of developing the Dodder Greenway as a greenway of international renown is to develop it as a wildlife, heritage and educational amenity resource for Dublin and as a tourist attraction.

Noted.

1. The Greenway should be for all uses and users, and include all riverbank paths and adjacent roads to reduce dependency on a single preferred route, encouraging diversity and exploration. It should include the river, its banks and all green spaces. Noted. It is intended the Dodder Greenway will be a universally accessible route. It is designed as a shared pedestrian / cyclist environment and will not be designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

The following is definition of a Greenway.

“Greenways are communication routes reserved exclusively for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area. These routes should meet satisfactory standards of width, gradient and surface condition to ensure that they are both user-friendly and low-risk for users of all abilities.

(Lille Declaration, European Greenways Association, 12th September 2000).”

1. Consideration must be given to how the SDCC section would best integrate with the DCC/DLR sections.

A Steering Group is currently being established including representatives across all the Authorities, this will ensure consistency of design approach along the full length of the final Dodder Greenway at the detailed design stage.

1. The Greenway should adapt to suit the changing environment along its length.

Noted. The proposed Dodder Greenway has been developed through a number of iterations responding to the many environmental and ecological constraints that exist along the route within the Dodder Valley adapting and changing in response to its surrounding environment both in terms of route selection and overall design parameters, widths / lighting / planting etc.

1. The single route scheme proposed for the SDCC section is not sustainable in the DCC/DLR section. This section could benefit from the application of the multi-route approach necessary in the DCC/DLR section. Noted. All route options under consideration within these locations (DCC/DLR section) were assessed for the EcIA (Section 2.2.1).

1. The application for Part VIII approval for the design of bridges linking the SDCC and DCC/DLR sections of the Greenway is premature. The granting of permission for the present SDCC Part VIII could prejudice the outcome of the detailed design stage for the DCC/DLR section. This could be remedied by the adoption of a common Greenway Development Plan by the three councils as soon as possible.

A Steering Group is currently being established including representatives across all the Authorities, this will ensure consistency of design approach along the full length of the final Dodder Greenway at the detailed design stage.

1. Before deciding on a “preferred route”, it is necessary to decide on a “preferred greenway”. The existing Dodder and environs is already a greenway, but it could be improved. It should be a matter of designing a greenway to suit the Dodder, rather than redesigning the Dodder to suit a particular type of greenway.

Noted. The proposed Dodder Greenway has been developed through a number of iterations responding to the many environmental and ecological constraints that exist along the route within the Dodder Valley. The Greenway has been adapted and changed in response to its surrounding environment both in terms of route selection and overall design parameters,

widths / lighting / planting etc. It is intended that this flexible approach to design and the accommodation of the sensitivities within the environment will remain the approach during the detailed design and construction stages.

1. Dodder Action prefers a multi-route approach. A greenway does not necessarily need to be a single route. While this type of greenway might be suitable in a disused railway setting, it is not appropriate for the Dodder. Dependence on a single route should be minimised. Diversity and exploration should be encouraged.

* Multi-route approach allows for retention of the existing landscape character and achieve a shared space greater than the 4 m width of a single path.
* Multi-route approach provides choice and diversity. Where alternative routes are available, they could be designated as “recommended through cycle route” and “amenity route”, for example.
* The multi-route approach does not require all paths to be widened. Widening of all paths would defeat the point, which is to encourage users to access all of the existing character, habitat and heritage amenity of the Dodder, without diminishing it in the process.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. Please note existing paths along the Dodder valley are being retained; and all paths within South Dublin County Councils Parks and open spaces are available for cyclist’s use, subject to pedestrians being given priority. The signage and branding strategy for the Dodder is intended to highlight alternative routes and encourage repeat visits; whereby a completely different experience can be obtained over several visits to the greenway.

9. All routes should be integrated by a signage system, highlighting points of interest, local shops and communities, and supported by map boards at regular intervals. Users of a singleroute greenway would be likely to bypass the amenity route past Oldbawn Weir.

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

11. A Code of Behaviour, whereby all users give way to those of lesser ability, should be promoted.

Noted.

16. Where access is limited by potential conflicts with ecological and heritage conservation, consultation should be initiated with relevant stakeholders.

NPWS and IFI were both consulted during the scoping stage of the Ecological Impact Assessment. Ongoing consultation with NPWS played a key role in highlighting the key ecologically sensitive areas and in developing the survey methodologies.

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| 1. A balance should be sought between the existing uses of the Dodder and the projectincreased use. However, the amenity must always be subject to environmental and heritage considerations.   Noted.     1. Greenway access to the riverbanks between Oldbawn Br. and Kiltipper Woods Nursing Home should be a long-term objective of the Greenway, subject to ecological and landowner constraints.   SDCC agree that having the Greenway running along the river as much as possible is the preferred option, subject to constraints. The area between Oldbawn Bridge and Kiltipper Park contains sensitive ecological features and is privately owned. SDCC may seek to develop the route along the river in this section in the future.     1. The upper and lower paths between Oldbawn Br. and the new footbridge should be included as alternative routes. There should be no lighting on the lower path.   Lighting of the Greenway will be agreed at detailed design stage in consultation and agreement with NPWS and taking both safety and sensitive ecological receptors into account.     1. Between the Victory Centre and the proposed Bolbrook Br., the upper path should be a through cycle route and the lower path should be left as is and designated an amenity route only. Noted.      1. Between Bolbrook Br. and Firhouse Weir, there is an existing path nearer the river. It will have to divert from the river at Bolbrook Br. due to space constraints. It should be left as is except at the bridge. Noted.      1. The existing path along the river between the M50 and Spawell Link Br. is in good condition but would benefit from widening to 3 m and preferably remaining unlit. This path should be included as a nature/amenity path alternative to the main route. Noted. Will be considered at the detailed design stage      1. The existing path on the north side of the river between Springfield Cottages and Springfield Ave. should be included in the Greenway as a designated nature/amenity path. The main through cycle route on the Kilvere side should be 3.5 m wide, and scope for less near Springfield Ave. to minimise impact.   Noted. Will be considered at the detailed design stage     1. The steps from Springfield Ave. To the riverbank path to Riverside Cottages should be replaces by a ramp to provide universal access. The existing underpass should also be upgraded to provide universal access to Busy Park river walk. Noted. Will be considered at the detailed design stage      1. The steps from Springfield Ave. to Busy Park river walk should be fitted with stair rails to facilitate access for cyclists.   Noted. Will be considered at the detailed design stage     1. The lower riverside path between Springfield Ave. bridge and Rathfarnham Road junction should be included as a designated nature/amenity path. Neither the upper nor the lower paths should be changed or lit. The path on the Bushy Park side cannot be included under this Part VIII as it is in DCC’s administrative area. Noted. Will be considered at the detailed design stage      1. The steps from Springfield Ave. down to the riverbank path beside the Owendoher River should be fitted with stair rails to facilitate access by cyclists. Noted. Will be considered at the detailed design stage |

1. If stepping stones similar to those a short distance downriver were installed across the Owendoher, users could continue alongside the river, rather than having to cross using Springfield Ave.

Noted. Will be considered at the detailed design stage

1. The proposed Busy Park Bridge appears to have been designed more as part of a greenway route rather than as an access link. It needs significant redesign before it is fit for purpose. In addition approval for this bridge could prejudice the design and planning process for the DCC section of the Greenway. It should be withdrawn pending completion of that process and redesigned as an access link only. The proposed design would be visually obtrusive and dominant, and diminish the existing landscape and character of the Dodder. It would dominate and diminish the existing heritage river walk along the demesne wall of Bushy Park. No photomontages have been provided. The modern design is incompatible with the surrounding old stone walls, trees and river. This is not an urban setting. The bridge should be redesigned in form and materials to complement the existing character of the Dodder.

Bushy Park Bridge will provide an important link to the Dodder Greenway for residents within Dublin City while also providing a valuable link to Bushy Park for the residents of Rathfarnham. The proposed bridge at Bushy Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into Bushy Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. High quality links to and from Greenways are considered important in terms of accessibility, encouraging usage and providing economic benefit to adjacent communities.

The proposed Bushy Park Bridge was also carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Bushy Park, existing trees, existing riverside vegetation, usage within the park, the Bushy Park riverside walk and its historic wall, and other historic features within the park.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010

Midway along Springfield Avenue a new bridge is proposed over the Dodder River linking the cycleway to Bushy Park. Coupled with the improved parking and related amenities at this location this would be in keeping with the Bushy Park Masterplan and the Greenway and the Masterplan would be mutually complementary and not raise significant landscape and visual impact issues. As elsewhere, the proposed bridge is an urban design opportunity and consideration of the design and its aesthetic contribution is important particularly in the context of this much loved historic demesne and park. However the straight alignment (90degree crossing) of the proposed link will integrate well.

The current proposal was considered the best fit with regard to the constraints within the location. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

It is envisaged that a number of trees within Bushy Park may be affected but the proposed location of the bridge was designed to minimise this possibility as much as possible and to avoid the more healthy and established specimen trees. At the detailed design stage further initiatives to decrease impact on the existing vegetation and the environment will be further examined in consultation with an arboriculturist and the parks and landscape services section in Dublin City Council and the public realm section in South Dublin County Council.

It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. The delivery of any combination of the feasible Greenway routes within Dublin City Council and Dun Laoghaire-Rathdown County Council areas do not preclude universal access to Bushy Park and Orwell Park from South Dublin County.

1. The inclusion of the proposal to demolish part of the demesne wall is inappropriate and should be removed. The bridge should be redesigned to avoid demolition. Noted.

The current Part 8 proposals with regard to Bushy Park bridge does not require any demolition of Bushy Park Wall. The Part 8 Report considers the possibility of demolition should it be required during the construction stage only and proposed mitigation to be taken in that case. However the council intend to proceed with the detailed design and construction stages on the basis of the current proposed design and will not include the requirement to demolish any portion of the Bushy Park wall.

1. The bridge would contravene Policy CHC4 of the DCC Development Plan 2016-2022 as it would “harm the setting of a conservation area” and “constitute a visually obtrusive or dominant form”.

The proposed Bushy Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Bushy Park, existing trees, existing riverside vegetation, usage within the park, the Bushy Park riverside walk and its historic wall, and other historic features within the park.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.

The proposed bridge at Bushy Park was specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into Bushy Park was of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

While the above considerations have an impact in terms of the requirements for the bridge design, the designs were carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.

Midway along Springfield Avenue a new bridge is proposed over the Dodder River linking the cycleway to Bushy Park. Coupled with the improved parking and related amenities at this location this would be in keeping with the Bushy Park Masterplan and the Greenway and the Masterplan would be mutually complementary and not raise significant landscape and visual impact issues. As elsewhere, the proposed bridge is an urban design opportunity and consideration of the design and its aesthetic contribution is important particularly in the context of this much loved historic demesne and park. However the straight alignment (90degree crossing) of the proposed link will integrate well.

The current proposal was considered the best fit with regard to the constraints within the location. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The current Part 8 proposals with regard to Bushy Park bridge does not require any demolition of Bushy Park Wall. The Part 8 Report considers the possibility of demolition should it be required during the construction stage only and proposed mitigation to be taken in that case. However the council intend to proceed with the detailed design and construction stages on the basis of the current proposed design and will not include the requirement to demolish any portion of the Bushy Park Wall.

32. The bridge would contravene Policy HCL10 Objectives 1 and 7 of the SDCC Development Plan 2016-2022 as it would not be “designed and sited to minimise environmental and visual impacts” and would not “preserve the amenity value of the (Dodder) river valley including its landscape value, views or vistas of the river valley, and its biodiversity value”.

The proposed Bushy Park Bridge also carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Bushy Park, existing trees, existing riverside vegetation, usage within the park, the Bushy Park riverside walk and its historic wall, and other historic features within the park.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each

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| of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.    The proposed bridge at Bushy Park was specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into Bushy Park was of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    Midway along Springfield Avenue a new bridge is proposed over the Dodder River linking the cycleway to Bushy Park. Coupled with the improved parking and related amenities at this location this would be in keeping with the Bushy Park Masterplan and the Greenway and the Masterplan would be mutually complementary and not raise significant landscape and visual impact issues. As elsewhere, the proposed bridge is an urban design opportunity and consideration of the design and its aesthetic contribution is important particularly in the context of this much loved historic demesne and park. However the straight alignment (90degree crossing) of the proposed link will integrate well.    The current proposal was considered the best fit with regard to the constraints within the location. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    It is envisaged that a number of trees within Bushy Park will be affected but the proposed location of the bridge was designed to minimise this possibility as much as possible and to avoid the more healthy and established specimen trees. At the detailed design stage further initiatives to decrease impact on the existing vegetation and the environment will be further examined in consultation with an arboriculturist and the parks and landscape services section in Dublin City Council and the public realm section in South Dublin County Council.    The current Part 8 proposals with regard to Bushy Park bridge does not require any demolition of Bushy Park Wall. The Part 8 Report considers the possibility of demolition should it be required during the construction stage only and proposed mitigation to be taken in that case. However the council intend to proceed with the detailed design and construction stages on the basis of the current proposed design and will not include the requirement to demolish any portion of the Bushy Park Wall. |

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| 1. There are no designated cycle routes in Bushy Park, except along Terenure Rd. There are no greenway links or routes proposed within Bushy Park. Therefore, as an access bridge only, it should require only a single ramp to connect to the route along Springfield Ave., which should not be diverted.     Bushy Park Bridge will provide an important link to the Dodder Greenway for residents within Dublin City while also providing a valuable link to Bushy Park for the residents of Rathfarnham. The proposed bridge at Bushy Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into Bushy Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. High quality links to and from Greenways are considered important in terms of accessibility, encouraging usage and providing economic benefit to adjacent communities.     1. At the eastern end, a similar, less obtrusive bridge could be constructed beside the existing stepping stones.   The proposed Bushy Park Bridge was also carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Bushy Park, existing trees, existing riverside vegetation, usage within the park, the Bushy Park riverside walk and its historic wall, and other historic features within the park.    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.    The proposed bridge at Bushy Park was specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into Bushy Park was of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    The current proposal was considered the best fit with regard to the constraints within the location. South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design |

of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

35. Concerns raised with regard to the design of Orwell Park Bridge The gradual access ramp with require the removal of large trees and will include a large podium covering almost all of the grass. The total length is some 150 m and a width of 4.4 m to accommodate a 4 m path. Minor alterations to the nearby footbridge could provide the same access. The proposed design is visually obtrusive and dominant. The length of the proposal within the DCC administrative area is of concern. The design risks prejudicing the outcome of the design and planning process in DCC. It should be removed or refused.

It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements.

Options with regard to expanding or amending the existing bridge; which was proposed at the feasibility stage, were examined at the preliminary design stage and tested against the topographical surveys and CFRAMS investigations etc. that were carried out. The current proposal was considered the best fit with regard to the constraints within the location.

South Dublin County Council has been committed to access and equality since the Council was established in 1995. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives.

The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.

While the above considerations have an impact in terms of the requirements for the bridge design, the designs were also carefully considered from the point of view of aesthetics, environmental impact and visual impact. Each of the bridges along the Dodder Greenway have been designed with a similar form in mind i.e. similar railing, deck surfacing, colour finish and access requirements. The proposed bridges will therefore be associated with a coherent Dodder Greenway scheme.

The route passes through Orwell Park – the constraints plan highlighted conflicts along existing park footpaths and seating areas - and on approaching the River Dodder rises up on

a bespoke ramp on piers to lift the bridge level over the river to land on the southern side of the river adjacent Dodder Park Road. The narrow landing area to the south – between the road and the river – requires the route, ramp and bridge to turn through 180degrees to cross the river and maintain suitable gradients.

The crossing is downstream of the existing narrow hump-backed pedestrian bridge and the long approaches facilitate the avoidance of many of the tree groups and clusters in the south western corner of the park and to the south of the river. Whilst some trees would require removal to accommodate the route and landing points this would not have a significant effect on the wooded river landscape. Within Orwell Park itself the long ramp on piers has potential to be visually intrusive however mitigation in the form of tree planting to the east of the ramp to extend the tree group around the cycleway reduces impacts. On crossing the river the route then travels along the existing shared route along Lower Dodder Road, with some widening and improvements, until it meets Rathfarnham Road.

Furthermore the design of the bridge at Orwell Park was chosen to suit its location to avoid existing vegetation as much as possible and utilise the existing woodland to allow it to merge into the landscape, the location chosen also reduces flood risk, avoids impact on the existing heritage in the area and matches with existing topography. The design and layout of the bridge allows views to Ely Gate to be framed from the bridge.

As part of the detailed design stage the Orwell Bridge will be subject to further liaison with both Councils’ Architectural Conservation Officers for comment and agreement prior to final design to ensure that the overall design, materials and finishes take cognisance of the adjacent protected structure ensuring that the overall visual effect of the bridge at this location is kept to a minimum and this can be achieved by good overall design and use of appropriate materials. The council agrees to further consult with the relevant stakeholders prior to completion of the final design.

1. As there is currently no Greenway design proposed in the DCC area, it is impossible to assess the impacts of this bridge as part of the overall Greenway.

It is acknowledged that the full Greenway design is not completed for DCC. However all the proposed feasible routes in both Dun-Laoghaire Rathdown County Council and Dublin City Council were assessed during the preliminary design stage of this proposed Part 8 in South Dublin County Council. The delivery of any combination of the feasible Greenway routes within Dublin City Council and Dun Laoghaire-Rathdown County Council areas do not preclude universal access to Orwell Park from South Dublin County.

1. The Section 85 refers to “a bridge”, a structure spanning a river or road. This proposal goes beyond that definition as it is a viaduct over land as well, not just a bridge. There is no mention of a path, widened or otherwise, in the agreement. The illustration of the “path to be widened” in this Part VIII application would, therefore, appear to contravene the agreement.

Approval for this bridge would be contrary to proper planning and sustainable development. The proposal should be withdrawn.

The Orwell Bridge structure is within 50m of the river bank as per the Section 85 agreement. The route ties into the adjacent footpaths using a sloped embankment in order to fully comply with accessibility requirements and best practice with regard to universal access design requirements. The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.

1. The proposed design is visually obtrusive and dominant, and would seriously diminish the existing landscape character of this part of the Dodder, the existing footbridge, the green space between the river and the road, Ely Gate (a protected structure) and the small but long-established Orwell Park and its environs. No photomontages have been provided. The location and modern design of the bridge is incompatible with the setting of the river, trees and protected structure. This is not an urban setting, it is a unique of nature and heritage. This bridge of 150 m would irrevocably diminish it.

The proposed Orwell Bridge is located on the opposite side of the road junction at Dodder Rd Lower from Ely Gate (Dodder Arch) which is a Protected Structure listed under schedule 2, South Dublin County Development Plan 2016-2022 RPS Ref. 201. Ely Gate is located within an area of open space which provides an immediate setting to the structure therefore it is very much a separate and standalone element which is a landmark feature at this location given its context and is highly visible from the road junction along the R112 at it sits within a corner site.

The proposed Orwell bridge is located some distance from the rear site of Ely Gate and will be located within an area of established green, the landing level will be opposite to the rear site of Ely Gate providing a new viewing point of Ely Gate at this location and additional passive surveillance. The new bridge feature will be viewed from the Dodder Road Lower and will not be visible at the main road junction along the R112 therefore will not compromise views of Ely Gate from its principle façade and front site. Along the Dodder Rd Lower junction the proposed bridge structure and the Protected Structure may be viewed at the same time but by virtue of its setting Ely Gate will not be competing at this point and will very much remain the dominate built feature. It is considered that the visual overall impact of the proposed bridge in an adjacent site to Ely Gate will have a negligible impact and there will be no direct impact on the protected structure or its setting given its prominent location and its current context.

The details provided of the bridge with regard to the cross sections and location are for preliminary design stage therefore it is considered that due to the proximity of the proposed Orwell bridge to the rear site of a Protected Structure the overall design, materials and finishes should take cognisance of the adjacent protected structure ensuring that the overall visual effect of the bridge at this location is kept to a minimum and this can be achieved by good overall design and use of appropriate materials. Details of the proposed Orwell bridge will be referred to both Councils Architectural Conservation Officers for comment and agreement prior to final design. The council agrees to further consult with the relevant stakeholders prior to completion of the final design.

1. The bridge would contravene Policy CHC4 of the DCC Development Plan 2016-2022 as it would “harm the setting of a conservation area” and “constitute a visually obtrusive or dominant form”, Policy G18 as it would fail to protect and enhance “views and prospects which contribute to the appreciation of landscape and natural heritage”, Objective G1018 as it would fail to “protect and improve the natural character of the watercourses, including the Dodder”, and Policy G116 as it would fail to protect and improve the unique natural character of a river forming a boundary to the administrative area of DCC.

The design of the proposed Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered.

The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the

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| Bridge will be subject to further liaison with both Councils’ Architectural Conservations Officer for comment and agreement prior to final design. The council agrees to further consult with the relevant stakeholders prior to completion of the final design.    41 The bridge would contravene Policy LHB25 (Rivers and Waterways) of the DLR County Development Plan 2016-2022, which states that “it is Council policy to maintain and protect the natural character and ecological value of the river and stream corridors in the county”, and would fail to “have no negative effects on the distinctive character and appearance of the waterway corridor and/or the characteristic and landscape elements of the specific site and its context”.    The design of the proposed Orwell Park Bridge was carefully considered and had to accommodate a number of factors inter alia; universal access, the existing topography within the area, ensuring the design did not impact on flood risk, ensuring minimal impact on: Orwell Park, surrounding houses, Ely Gate and the historic features within the park. Also existing usage within the area such as the existing pedestrian bridge which accommodates access to a nearby school had to be carefully considered.    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010.    The proposed bridge at Orwell Park is specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. It was noted at the preliminary stage for the Greenway that the existing pedestrian bridges into both Bushy Park and Orwell Park were of an older vintage and were not compliant with current universal access requirements. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    The proposed bridges along the route, including the proposed bridge at Orwell Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010. |

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| It was noted at the preliminary stage for the Greenway that the existing pedestrian bridge into Orwell Park was of an older vintage and was not compliant with current universal access requirements. Options with regard to expanding or amending the existing bridge were examined at the preliminary design stage and the current proposal was considered the best fit with regard to all the constraints within the location.    The proposed bridges along the route, including the proposed bridge at Orwell Park are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all. South Dublin adopted the Barcelona Declaration in June 2002 and has been actively implementing the Declaration ever since through various actions and access initiatives. The proposed bridges along the route, including the proposed bridge at Bush Park, are specifically designed to comply with Building Regulations Technical Guidance Document, Part M, Access and Use. The Dodder Greenway route design, including the design of the proposed bridges, aims to ensure that access to the Greenway and to the parks along the route would be freely achievable by all.    The River Dodder has a history of flooding and given its source in the Dublin Mountains flood levels rise quite quickly during heavy rain storms. It was therefore necessary to assess each of the proposed bridges through the CFRAMS (Catchment Flood Risk Assessment and Management Study) model and to verify that the proposals did not have an effect on the existing flood scenarios. Each of the proposed bridges were designed to cater for the minimum requirements plus an additional volume of freeboard. Following the analysis a Section 50 application for the Construction, Replacement or Alteration of Bridges and Culverts was submitted to the OPW and subsequently granted approval. The section 50 application requires the design proposal to demonstrate the minimum hydraulic design standards as set out in the European Communities (Assessment and Management of Flood risks) Regulation SI 122 of 2010    It is intended to retain the existing bridge at Orwell Park as it provides pedestrian access for the nearby school.     1. Written agreements should be reached with relevant bodies in relation to all Plans and Schedules prior to commencement of works.   As committed to in the Part 8 documents NPWS and IFI will be consulted throughout the Detailed Design and Construction phases of the project, as will the relevant Heritage Officers. South Dublin County Council will also appoint an Ecological Clerk of Works (ECoW) to oversee the implementation of the CESCP and all other mitigation measures and ecological enhancements.     1. In the best interest of ecology, agreement with relevant bodies should be sought for the long-term operation of the Greenway and not just the construction stage.   Section 9 of the EcIA details the post construction monitoring proposals. Following the submission from the NPWS the monitoring of otter and bats will take place in years 1, 2 and 3 and onwards if required during consultation with NPWS. Otter and bats are deemed to be the most sensitive ecological receptors based on the potential impacts of the operation of the Dodder Greenway.     1. Specific conditions should be attached to any Part VIII approval for each of the following documents to be submitted for written agreement by the NPWS prior to works:    * Construction Management Plan and Schedule to include work proposed in or   around the Dodder and its banks and adjoining green spaces, but excluding works proposed along public roads.   * + Landscaping Plan and Schedule for all areas where loss of existing trees and   vegetation, restoration and enhancement works are proposed, to respect and reflect the existing landscape character of the Dodder and adjoining green spaces. |

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| * Lighting Plan and Schedule for all areas where account should be taken of   bats and other light-sensitive species for new and existing lighting.   * Invasive Species Management Plan and Schedule.   These plans and schedules should be prepared by suitably qualified persons and for the full extent of the Greenway.  NPWS will be consulted throughout the detailed design stage. The Contractor will be required to submit all of the relevant plans, programmes and method statements for approval prior to commencement, including a CEMP.    48. Lighting along the river should be minimal and new installation justified. New lighting should be bat-friendly in frequency, placement and direction. Sensor control for automatic dimming could be considered. The energy source should be solar to avoid disruptive installation  Sections 5.4.4 and 7.4.12 detail the lighting code to inform the detailed design. The lighting design will aim to meet the health and safety needs of Greenway users and minimise light related impacts on wildlife. As described in section 7.4.12, the starting point in lighting design is to consider no lighting.    49 Seating should be provided at regular intervals, e.g. every 200 m, and at suitable vantage points. Seating should be wooden for comfort, with arm rests on one end to facilitate those with lesser mobility and none on the other end to facilitate wheelchair users.  Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Solar Compactor Bins should be installed with Dog Waste Bins (with dispensers for biodegradable bags). Bins should be installed at entrances where they intersect with roads.   Bicycle stairs should be installed at all steps.  Noted. As per South Dublin County Council’s waste management plan all litter bins in South Dublin may be used for all litter waste, including dog waste. However the locations and number of litter bins along the Greenway will be considered as part of an overall Landscape plan at the detailed design stage.     1. Distance markers should be installed at 500 m intervals with continuous distance indication in both directions and a single start and finish point. Each marker should also give altitude. In multi-route instances, the shortest route could be the reference route.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Outdoor gyms could be considered and installed, where appropriate.   Noted and will be considered as part of an overall Landscape plan at the detailed design stage.     1. Aspects of habitat and heritage, landscape and views, the promotion of community and educational links should be addressed in the Part VIII proposal.   All aspects on wildlife has been address in the Part VIII proposal, the Ecological Impact Assessment, the EIA Screening Report and the AA Screening Report. The potential for educational and community links will be addressed at Detailed Design stage.     1. Existing and potential natural, heritage and community proposals should be a priority for the Greenway.   The Greenway has been designed to avoid heritage features where feasible and to be sympathetic to the heritage of the corridor as much as possible.     1. No register of historical and heritage sites for the route or the whole river appears to have been compiled, which is essential for their protection. The Environmental Impact Assessment appeared to not find any significant impact on heritage structures in a “worst case” scenario. Dodder Action does not agree, e.g. the cantilever bridges attached to the |

unique Ringsend Bridge, the cantilever boardwalk over the Beaver Row mill race and the visual impact on Ely Gate.

A full register of historical and heritage sites was compiled by the Cultural heritage specialists (IAC Ltd.), however only a summary has been included in the EIA Screening and Part 8 Report for conciseness purposes.

1. A condition should be attached to this Part VIII that a register of all heritage, archaeological ad historical sites and their significance along and in the vicinity of the Dodder be published prior to commencement of works. This has been prepared and can be made available.

1. Particular care should be taken during and after all construction, restoration and enhancement works to avoid the spread of invasive species. An Invasive Species Management Plan and Schedule should be produced.

An invasive species management plan was included as part of the Part VIII application (See Ecological Impact Assessment Appendix F.

1. There is an urgent need for a long-term Maintenance Plan for the river and its banks as part of an overall Environmental Management Plan, which would be essential to the success of the Greenway.

Noted. Maintenance is outside the scope of the Part 8 requirements; however the maintenance of the Greenway will be of high importance to the successful delivery and operation of the Dodder Greenway. An operational and maintenance strategy will be prepared to ensure successful delivery in this regard.

1. A single authority or body with responsibility for the development of the overall Greenway should be established from the relevant departments of the three LAs concerned.

A Steering Group is currently being established including representatives across all the Authorities, this will ensure consistency of design approach along the full length of the final Dodder Greenway at the detailed design stage.

1. No overall quantification of the impacts on the existing Dodder landscape appears to have been included in the application or environmental assessments. Detailed estimates of square metres of grassland to be covered, areas of hedgerow and number of trees to be cut down do not appear to have been included.

Section 4.5 of the EcIA states no Annex I habitat will be lost. Section 5.4.3 states that new paths will constitute 13% of the total Greenway area. The percentage loss of habitat, especially ecologically important habitat, would be very small with respect to the total available similar habitat in the Dodder Valley.

1. Drawings, photomontages and an environmental report are not enough in a greenway Part VIII. A single Greenway Development Plan and a single Environmental Report should be developed to cover the full Part VIII applications for the three LAs, to inform a single Environmental Management Plan, educational aspects, enhancement of habitats, heritage and tourist trials, community/business links and proposals etc.

The Ecological and Environmental Assessment were carried out of the whole watercourse and route of the Greenway as detail in the EcIA and the potential impacts on the habitats and species were assessed based on the populations with the entire river corridor. The EcIA and AA Screening followed best practice guidelines as cited in the texts. Following NRA/ TII Guidelines for Assessment of Ecological Impacts on National Roads (2009), which defines receptors, both species and habitats, of local, county, national and international importance, none of the identified Key Ecological Receptors (EcIA Section 5.3) can be described as of national or international importance in this regard. The Greenway has been designed with biodiversity in mind and with the aim of having an overall neutral to positive impact on biodiversity. A suite of protective measures, including: mitigation to protect the river habitat during construction and operation; ecological enhancement measures proposed to increase the quality of habitats in the Dodder Valley; post construction monitoring of bats and otter; and ongoing consultation with NPWS during detailed design stage have been submitted as part of the planning application. Avoidance of sensitive habitats and in stream works have further reduced the impacts of the greenway at the earliest possible stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

## Submission no. 49 – Cllr Paula Donovan

This submission relates to the following issues:

1. Supports the proposed investment in the River Dodder Area and the progressing of a plan. Noted.

1. Requests that consideration is given to the installation of ducting for CCTV as and when the Public Lighting is being designed/installed to allow for additional CCTV if required.

Noted; CCTV is proposed for selected locations along the route; these and other possible locations will be further considered at the detailed design stage. It is unlikely, however that ducting for CCTV will be installed along the full length of the proposed route.

1. Requests that new lighting solutions such as solar powered lighting be considered as part of the design stage.

Noted and will be considered as part of the lighting plan at the detailed design stage.

1. Request that fruit bearing hedgerow is included within the landscaping proposals for the scheme.

Noted and will be considered as part of an overall Landscape plan at the detailed design stage.

1. Requests that the provision of natural play spaces is included within the scheme in keeping with local heritage.

The Greenway project will consider plans to improve the environment through which it passes. It is unlikely, however, due to budgetary reasons that the scope of the project will expand to include play spaces. There are a number of locations that require increased interventions for various reasons (e.g. due to their significant location along the Greenway or their heritage or landscape value etc.). At such locations the possibility to provide for incidental play can be considered.

1. Requests the provision of good quality signage and information on areas of biodiversity to inform the public.

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

1. Requests that adequate bins provisions are included within the scheme

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. Requests that landscaping proposals seek to minimise ongoing maintenance through selective species

Noted. It is intended that the main route will be planted with low maintenance species with an emphasis on protecting and enhancing existing biodiversity. The type of plant and species will depend on the existing ecology. Grass and meadowland management will also form part of the detailed proposals. There are a number of locations that will require specialised treatment for various reasons (e.g. due to their significant location along the Greenway or their heritage or landscape value etc.). These issues will be considered as part of an overall Landscape Plan at the detailed design stage.

1. Request that cyclists and pedestrians are segregated where possible and where segregation is not possible consideration is given to introducing Speed Limits, Priority time zones for each users i.e. Priority time zones for commuters / Priority time zones for Pedestrians and runners / Priority time zones for off lead dog walking etc.

Noted. The proposed Dodder Greenway is designed as a universally accessible route and a shared pedestrian and cyclist route. It is not designed as a route for high speed cyclists. The Greenway will facilitate shared use by pedestrians and cyclists and users of all ages and abilities in a pedestrian priority environment.

1. Request that an alternative route be considered, along the banks of the dodder, for the section of the greenway that extends from Cherryfield through junction with Ballyroan Road and along Butterfield Avenue to seek a safer alternative solution.

Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes for the section between Cherryfield and Butterfield Avenue. Due to a variety of constraints at that location; the current proposed route is the most feasible one. The Council remain open to further enhancing the route at a later stage should any alternative opportunities arise or parameters change into the future. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use.

1. Request that surface of Greenway is made suitable for running i.e. (not Concrete) Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

1. Request that signage and branding is continuous along the entire route and should include for distance signage (KM).

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

1. Request that branding be made available to all local business and advertising should include outside of SDCC and in particular to Dublin City.

Noted and will be considered as part of an overall signage and branding strategy for the Greenway.

1. Scheme should identify suitable sites for bicycle hire hubs to target tourists coming from outside the SDCC area and encourage bike rental opportunities with local business.

This would be outside the scope of the current Part 8 proposal. However the Council is interested in promoting the use of sustainable modes of transport within the county and is open to discussion with interested parties.

1. Scheme should provide for adequate bicycle racks and locking facilities in villages and attraction sites along the route.

Noted and will be considered as part of an overall Landscape Plan at the detailed design stage.

**Chief Executives Response and Recommendation:**

1. Submission noted.
2. Chief Executives Responses and Recommendations have been incorporated into the submission summary above.

**5.0 DEVELOPMENT PLAN POLICIES**

# South Dublin County Council Development Plan 2016-2022

**It is the policy of the Council to support and facilitate the development of an integrated network of Greenways and Trails (combined off road cycle and walking routes) along suitable corridors, including natural linear open spaces such as river banks and canals, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.**

**ET6 Objective 1:**

To support and facilitate the development of an integrated network of Greenways and Trails, including blueways/water trails, along suitable corridors, including the River Liffey, Dublin Mountains Way, Grand Canal, River Dodder and Slade Valley.

**ET6 Objective 2:**

To support the development of local tourist and heritage trails at suitable locations such as Brittas, Clondalkin, Lucan, Newcastle-Lyons, Rathcoole, Rathfarnham, Saggart, and Tallaght and seek to make such trails interactive e.g. development of application software.

**ET6 Objective 3:**

To support and facilitate the development of accessible links between the Liffey Valley and the Grand Canal.

**It is the policy of the Council to support and facilitate the development of leisure activities in the County.**

**ET7 Objective 1:**

To promote the active use of managed forests for tourism and leisure related activities subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.

**ET7 Objective 2:**

To promote the development of outdoor leisure activities on lands that are designated with Zoning Objective Open Space ‘OS’ (to preserve and provide for open space and recreational amenities).

**ET7 Objective 3:**

To support the development of angling and canoeing/kayaking infrastructure and facilities for tourism in proximity to appropriate water courses or water bodies, subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.

**It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic calmed street environment.**

**TM3 Objective 1:**

To create a comprehensive and legible County-wide network of cycling and walking routes that link communities to key destinations, amenities and leisure activities with reference to the policies and objectives contained in Chapter 9 (Heritage, Conservation and Landscape) particularly those that relate to Public Rights of Way and Permissive Access Routes.

**TM3 Objective 6:**

**To ensure that all walking and cycling routes have regard to pertaining environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures as part of any environmental assessments.**

**STRATEGIC CYCLE NETWORK**

**Green Routes:** These provide tourist, recreational and leisure routes through amenity areas and along water courses including the Dodder Valley, Grand Canal, Griffeen Valley, Liffey Valley and Tymon Park.

Transport and Mobility (TM) Policy 3 Walking and Cycling states that:

**It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities within a safe and traffic-calmed street environment.**

**It is the policy of the Council to provide a hierarchy of high quality and multifunctional public parks and open spaces.**

**G4 Objective 3:**

To enhance and diversify the outdoor recreational potential of public open spaces and parks, subject to the protection of the natural environment.

**G4 Objective 4:**

To minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.

**It is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Liffey Valley and Dodder Valley, as key elements of the County’s Green Infrastructure network.**

**HCL10 Objective 2:**

To ensure that development within the Liffey Valley and Dodder Valley will not prejudice the future creation and development of uninterrupted and coherent parklands including local and regional networks of walking and cycling routes.

**HCL10 Objective 3:**

To ensure that development proposals within the Liffey Valley and Dodder Valley, including local and regional networks of walking and cycling routes, maximise the opportunities for enhancement of existing ecological features and protects and incorporates high value natural heritage features including watercourses, wetlands, grasslands, woodlands, mature trees, hedgerows and ditches, as part of the County’s Green Infrastructure network.

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.

# Dublin County Council Development Plan 2016-2022

It is the policy of the Council to support and facilitate the development of an integrated network of Greenways and Trails (combined off road cycle and walking routes) along suitable corridors, including natural linear open spaces such as river banks and canals, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.

GI15: To protect, maintain, and enhance the natural and organic character of the watercourses in the city, including opening up to daylight where safe and feasible. The creation and/or Enhancement of riparian buffer zones will be required where possible. It is the policy of Dublin City Council to maintain and enhance the safety of the public in its use and enjoyment of the many public parks, open spaces, waterways and linkages within the city, including the River Dodder between Ringsend and Orwell (Waldron’s) bridge, and at the area known as Scully’s Field between Clonskeagh and Milltown.

GIO18: To protect and improve the natural character of watercourses, including the Dodder, and to promote access, walkways, cycleways and other compatible recreational uses along them, having regard to environmental sensitivities.

GIO21: To co-operate with the relevant adjoining local authorities of Dún Laoghaire– Rathdown and South Dublin Councils in developing a strategy for the preparation and graduated Implementation of an integrated Maintenance, Improvement and Environmental Management Plan for the entire length of the River Dodder and to support the establishment of a co-ordinating River Dodder Authority or equivalent body to implement that strategy. This plan should reflect the relevant recommendations of the Eastern Catchment Flood Risk Assessment and Management and associated Unit of Measurement Flood Risk Management Plan(s) and associated Environmental Reports.

MT2: Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government’s ‘Smarter Travel’ document and in the NTA’s draft transport strategy are key elements of this approach.

MT7: To improve the city’s environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA’s Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.

MT8: To work with, and actively promote, initiatives by relevant agencies and stakeholders such as An Taisce’s ‘Green Schools’ initiative and the NTAs Smarter Travel Unit, to promote active travel in schools and communities, recognising the health and social benefits of walking and cycling as well as the environmental benefits.

MT20: To increase capacity of public transport, cycling and walking, where required, in order to achieve sustainable transportation policy objectives. Any works undertaken will include as an objective, enhanced provision for safety, public transportation, cyclists and pedestrians, and will be subject to environmental and conservation considerations.

GI27: To minimise the environmental impact of external lighting at sensitive locations to achieve a sustainable balance between the needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.

**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 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, for a Dodder Greenway route scheme within South Dublin County including proposed bridges at Orwell Park and Bushy Park, a portion of which are in Dublin City Council lands.**