

**COMHAIRLE CONTAE ÁTHA CLIATH THEAS**  
**SOUTH DUBLIN COUNTY COUNCIL**



**MEETING OF SOUTH DUBLIN COUNTY COUNCIL**

**Tuesday, May 7th, 2019**

**HEADED ITEM NO.19(a)**

**HEADED ITEM:** Director of Economic, Enterprise & Tourism Development

**APPROVAL OF PART 8 CANAL GREENWAY**

## 1. Introduction

In accordance with the requirements of Part XI Planning and Development Act, 2000 (as amended) (the Act) and Part 8 of the Planning and Development Regulations, 2001 (as amended) (the Regulations), South Dublin County Council (SDCC) is seeking planning consent to develop the Grand Canal Greenway (the Greenway).

The proposed Greenway comprises approx. 4.6km of the Grand Canal (the Canal) towpath, located in the townlands of Hazelhatch, Loughtown Lower, Mullauns, Coolscuddan, Gollierstown, and Ballymakailly in SDCC administrative area. Approximately 500 metres of the proposed Greenway is in Kildare County Council (KCC) in the townlands of Balscott and Stacumney Cottage. As a result, KCC entered into an agreement with SDCC under Section 85 of the Local Government Act 2001. This empowers SDCC to take responsibility for the delivery of the 500 metres of the proposed Greenway in KCC.

## 2. Site Description

The proposed Greenway will utilise the route of the existing towpath on the northern side of the Canal between the 12th Lock and Hazelhatch Bridge at Celbridge. The proposed Greenway traverses a rural landscape and there are several features of archaeological, geological, built heritage and ecological interest along the route.

The western end of the proposed Greenway, around Hazelhatch Bridge, which is a Protected Structure, is occupied by canal boats. There are several houses and a public house in the vicinity. The eastern end of the proposed Greenway at the 12th Lock adjacent to the R120 regional road is fronted by a cluster of buildings.

The proposed 4.6km Greenway is bound to the north by mature trees, hedges, ponds and wetlands, and to the south by canal bank vegetation, with the Canal and a similar vegetation beyond. A small number of streams traverse the proposed Greenway and the remains of a mill building is situated in the western portion of the route. Gollierstown Bridge, which is a Protected Structure, is situated in the eastern portion of the proposed Greenway, along with a series of ponds which were originally quarried to provide stone for canal construction.

## 3. Scheme Description

The proposed Greenway consists of the following:

- 4.6 km of shared walking and cycling route along the existing northern Grand Canal towpath;
- Path widths of 2.5m to 3.5m (dictated by existing site features);
- Unbound surface i.e. Quarry Dust;
- Pedestrian and cycle gates to facilitate access along the route;
- Ducting for underground utilities and services (Electricity, telecom, Public Lighting & CCTV);
- Integrated landscape plans for the route; and
- All associated ancillary works.

## 4. Purpose of the Report

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

## 5. Public Consultation

Plans and particulars of the Greenway were on public display for over five (5) weeks from 14th December 2018 to 21st January 2019 (inclusive). During the public consultation information on the Greenway was disseminated to the public and submissions were invited.

The public consultation on the proposed Greenway included the following statutory and non-statutory elements:

- Newspaper Notice in the Irish Independent;
- Public consultation displays in South Dublin County Council Offices at County Hall, Clondalkin Civic Offices, Lucan Library, Clondalkin Library and Tallaght Library and Kildare County Council Offices at Aras Chill Dara, Naas, Co Kildare.
- Briefings for Elected Members; and
- A Social Media campaign including Facebook and Twitter.

Submissions and observations on the Grand Canal Greenway could be made online and in writing for a period of over seven (7) weeks between Friday 14th December 2018 to Monday 4th February 2019 (inclusive).

## 6. Legislative Background

Section 179 (3) of the Act, requires that the Chief Executive shall, after the end of the public consultation period, prepare a written report in relation to the proposed development and submit the report to the members.

Section 179(b) of the Act outlines that a report shall—

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

Under Section 179(4) of the Act, the elected members shall, as soon as practical, 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 six (6) weeks after receipt of the Chief Executive's report.

## 7. Environmental Impact Assessment and Appropriate Assessment

The site and environs are not covered by any European Habitat designations. The Canal is designated nationally as a proposed Natural Heritage Area (NHA). There are protected plant and animal species in the vicinity.

The proposal was subject to screening for “*Environmental Impact Assessment*” under the EIA Directive 2014/52/EU. The Chief Executive determined that there was no real likelihood of significant effects

on the environment arising from the Greenway and that an Environmental Impact Assessment Report (EIAR) was not required.

On 11 January 2019, under Article 120(3) (a) of the Regulations 2001, the SDCC EIA screening determination was subject to a third-party request<sup>1</sup> to An Bord Pleanála (An Bord) to issue a direction requesting SDCC prepare an EIAR. On 10<sup>th</sup> April 2019, An Bord determined that the proposed Greenway would not be likely to have significant effects on the environment and that the preparation and submission of an EIAR was not required.

The proposed Greenway was subject to Appropriate Assessment Screening under the Habitats Directive (92/43/EEC). The Chief Executive has made a determination that a Stage 2 Appropriate Assessment was not required.

An Ecological Impact Assessment Report (EclAR) was prepared in respect of the proposed works. The EclAR has informed and inputted into the design of the proposed Greenway.

As a result of the above, in accordance with Part XI of the Act, the elected members of SDCC can consider the proposed Greenway under Part 8 of the Regulations.

## 8. Benefits and Objectives of Scheme

A Greenway is defined as a *“recreational or pedestrian corridor for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area”*<sup>2</sup>.

The Greenway has been designed to benefit and meet the recreational and commuting needs of pedestrians and cyclists. It has also been designed to cater for wheelchair users, children in buggies and people on all types of bicycles. Moreover, it will create a walking and cycling route which will be integrated into the emerging national cycle network, support active transport modes, and provide access to employment centres and local amenities.

The main objectives of the Greenway are to:

- Provide an attractive and functional pedestrian and cycle route;
- Encourage modal shift (from private to public transport) and promote physical activity, health and wellbeing among residents in the wider Lucan/Clondalkin/West Dublin area and employees in the Grange Castle Business Park;
- Increase pedestrian and cycle activity in Lucan, Adamstown, Peamount and Celbridge;
- Improve access to Hazelhatch and Adamstown Train stations by active modes;
- Provide access to rural areas normally inaccessible to mobility impaired users;
- Provide a recreational amenity that can be recognised locally, nationally and internationally as a first-rate tourist attraction;
- Contribute to the development of the overall Greenway Strategy from the Grand Canal Dock in Dublin to Shannon Harbour.

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<sup>1</sup> An Bord Pleanála Ref: ABP-303499-19

<sup>2</sup> *“Strategy for Future Development of National and Regional Greenways”* (July 2018) Department of Transport, Tourism and Sports.

## 9. Requirement for Scheme

Fáilte Ireland market research has demonstrated that along with the already existing growth in cycling and walking activities, there is great tourism potential for greenways, particularly where the right type of infrastructure can be developed in the right places for the right people.<sup>3</sup>

The Waterford Greenway and the Mayo's Great Western Greenway have demonstrated the potential of greenways as economic contributors to rural communities through increased tourist patronage. In addition, there are significant benefits for the health and wellbeing of wider society through using greenways as recreational amenities.

Greenways can assist in attracting visitors away from the busy traditional tourist centres and into rural communities. The associated job creation potential in local tourism and hospitality businesses is significant.

The proposed Greenway will also provide a commuter route to service the Grange Castle Business Park (GCBP) and the wider residential community of Lucan/Clondalkin and west Dublin.

## 10. Outcome of Public Consultation Programme

A total of sixteen (16) submissions/observations were received.

A list of all the persons, organisations and bodies that made submissions is provided in the Table below together with a reference number that can be cross referenced to submission summaries contained in Section 11 of this Report. The reference numbers can also be clicked as a link (on electronic copies of this Report) to a database containing scanned or uploaded copies of each submission. For reasons of data protection, these links can only be accessed by Elected Members of South Dublin County Council. Full summaries of the issues raised in the submissions are provided in Section 11 below.

Person	Company	Body Represented	Ref
Natasha Crudden		Transport Infrastructure Ireland	<a href="#">GCGH0001</a>
Cllr. Emer Higgins			<a href="#">GCGH0002</a>
Dylan Potter		Geological Survey Ireland	<a href="#">GCGH0003</a>
Sadhbh O'Connor	Thornton O'Connor Town Planning	Henry Crowley and Ted Crowley	<a href="#">GCGH0004</a>
Michael Murphy		Department of Culture, Heritage and the Gaeltacht	<a href="#">GCGH0005</a>
Gretta Hannigan		Inland Fisheries Ireland	<a href="#">GCGH0006</a>
Jim O'Riordan		Dublin Branch Inland Waterways Association of Ireland (IWAI)	<a href="#">GCGH0007</a>
Shane O'Brien			<a href="#">GCGH0008</a>
Caroline O'Brien			<a href="#">GCGH0009</a>
Stephen Johnson		Celbridge Community Council	<a href="#">GCGH0010</a>
Colm Ryder		Dublin Cycling Campaign	<a href="#">GCGH0011</a>
Irene O'Neill			<a href="#">GCGH0012</a>
Alison Maddock			<a href="#">GCGH0013</a>
Conor Nolan		Heritage Boat Association	<a href="#">GCGH0014</a>

<sup>3</sup> ibid

Person	Company	Body Represented	Ref
Niall Charleton			<a href="#">GCGH0015</a>
Susan McBennett			<a href="#">GCGH0016</a>

## 11. Summary of Issues Raised and Chief Executive's Responses and Recommendations

### **SUBMISSION NO 1 TRANSPORT INFRASTRUCTURE IRELAND** ([GCGH0001](#))

1. Receipt of referral acknowledged. No specific observations.

#### **Chief Executive's Response:**

SDCC acknowledges that TII has no specific observations to make in relation to the proposed development.

#### **Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

### **SUBMISSION NO. 2 CLLR. EMER HIGGINS** ([GCGH0002](#))

1. Proposed greenway welcomed including potential to make significant social and economic impact.
2. It is requested that the Council takes account of the need to make this amenity accessible to residents. Local residents should be given safe access through permeability links, the installation of CCTV and access gates.
3. It is requested that disruption to barges is minimised during works and there should be full consultation and collaboration.

#### **Chief Executive's Response:**

SDCC acknowledges Councillor Higgins' submission and comments. Accommodating accessibility for residents (permeability links and gates) and minimising impact on barges and will be given due consideration during the detailed design phase of the proposed development. In the context of the absence of additional proposed canal crossings under the proposed development, it is considered that the disruption of barges during construction works will be minimal and can be dealt with by way of a Construction Environmental Management Plan (CEMP), which will be prepared in advance of any works commencing on site and will be monitored by an Ecological Clerk of Works during the construction.

In the context of the ecological sensitivity of the Grand Canal pNHA and the mitigation measures proposed as part of the proposed development in response to its accompanying Ecological Impact Assessment (EclA), no public lighting or CCTV is proposed as part of the subject greenway.

The sensitive design approach of the proposed development responds to issues raised by the Department of Culture Heritage & the Gaeltacht (DCHG) during the preplanning consultations.

This approach is reflected by the Environmental Impact Assessment (EIA) screening report carried on the proposed development, which has concluded that the effects of the proposed development are considered not to be of likely significance, due to the minor development footprint, the characteristics and sensitivities of the receiving environment and design and mitigation measures.

#### **Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 3 GEOLOGICAL SURVEY IRELAND ([GCGH0003](#))**

1. Copies of reports detailing site investigations requested including photographs and the potential for site visits. It is advised that GSI can be consulted on data, interpretation and mapping etc.
2. Noted that GSI has been referenced under SFRA and EIA Scoping. It is advised that the GSI map viewer be used.
3. Records show that there are no County Geological Sites located within the vicinity and there is no envisaged impact.
4. It also requested that any rock exposures are allowed to remain visible rather than be covered.

**Chief Executive's Response:**

SDCC acknowledges the submission of the Geological Survey of Ireland (GSI) and notes the services provided within GSI website. SDCC intends to forward any Ground Investigation reports generated during the investigative stages attributed to the proposed Grand Canal Greenway scheme to GSI as requested.

With regard to retaining the visibility of rock exposures, it is advised that a CEMP will be prepared in advance of any works commencing on site. The CEMP will include mitigation measures to safeguard the environment. The implementation of such measures will be monitored by an Ecological Clerk of Works during the construction phase of the project. Notwithstanding the location of the project area outside of a County Geological Sites and the minimal excavation that will occur either side of the proposed greenway route, this will increase the opportunity to retain and incorporate any rock exposures.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 4 HENRY CROWLEY AND TED CROWLEY ([GCGH0004](#))**

1. Principle of development welcomed. Concern raised in relation to nature and operation of double field gates across access bridge with ramped access to greenway creating risk and potential conflict between the public and operation of clients' farm.
2. The historic Gollierstown Bridge is a Protected Structure and facilitates agricultural activity. Concern is expressed regarding how traffic will interact with the bridge and landholders' access. The need to amend the design of the proposal at this location is suggested.
3. The proposed greenway approaches the Gollierstown Bridge on the north bank of the Canal and the design makes use of the sloped approaches on either side of the bridge to bring it up above canal level interacting with the laneway that crosses the bridge. The is intended for farm access and not a public right of way.
4. Greenway design proposals are not detailed enough to fully describe particulars such as such as access, gates, boundary treatment and signage/development. There is insufficient detail on diagrams with regards to average widths and Gollierstown Bridge
5. Client's require frequent movement of cattle and machinery and access can only be achieved via the Gollierstown Bridge creating a concern in relation to (inter alia) insurance difficulties and operation of agricultural business. Documentation does not clarify how greenway users can be stopped when agricultural machinery and cattle are crossing and liability for such. Disturbance may be detrimental to viability and reputation of client's business and from a bio-security and safety perspective.

6. There is no evidence that alternative arrangements have been considered. Concerns in relation to continued agricultural use of the Gollierstown Bridge necessitates the consideration of a range of alternatives. The bridge is only suited to traffic travelling in one direction. A suggested alternative includes diverting underneath the bridge with a shared path to divert traffic from the private laneway.
7. Short - medium terms uses need to be respected. The subject site is zoned 'Objective RU' and are situated between the Grand Canal and Dublin-Cork Railway line. Development of the greenway needs to consider the current use of lands including the protection of agriculture. Concern is raised in relation to the uses such as dirt bikes/scramblers, dumping and dog walking with the potential for harming cattle, damaging the ecosystem and damaging bio-security.

**Chief Executive's Response:**

SDCC acknowledges Thornton O'Connor Town Planning (TOTP) submission on behalf of Mr. Henry and Ted Crowley and comments contained within. SDCC note, that in principle, the clients of TOPT support the proposed Grand Canal Greenway scheme. In response to TOPT's concerns, it is advised this Part 8 proposal does not envisage any change to the status of Gollierstown Bridge.

Routing the greenway under the Gollierstown Bridge was examined during the preparation of the Part 8 proposal and was determined not to be feasible or practicable from the perspective of accessibility in terms of constraints on route widths, height clearance and gradient. This is in the context that the greenway proposal has been designed and will be developed to cater for users with different abilities and needs in terms of mobility.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 5 DEPARTMENT OF CULTURE HERITAGE & THE GAELTACHT ([GCGH0005](#))**

1. The proposed project lies within the Grand Canal proposed Natural Heritage Area. The entire stretch of the north bank of the Grand Canal between the 12th Lock and Hazelhatch has been identified as an Ecologically Sensitive Area (ESA), which indicates that the canal in the area is of particular biodiversity importance. A number of notable and protected habitats and species are found along the route of the proposed greenway.
2. The Department recognises that South Dublin County Council has significantly altered its original proposals for the Greenway in response to issues raised during the preplanning consultations. The absence of proposals plans to tarmac the greenway or to install lighting proposals alleviates concerns particularly for very light sensitive species.
3. The Department notes that SDCC has prepared an Environmental Impact Assessment (EIA) screening report. Article 120 of the Planning and Development Regulations requires that information in Schedule 7A of the regulations should be included in the screening report. It is the view of this Department that the impacts on biodiversity, including habitats and species protected under the Habitats Directive, have not been adequately assessed in the EIA screening report and determination. The Department considers that impacts specific to this project must be further assessed.
4. *Vertigo moulinsiana* has been recorded around the pond to the north of the towpath in the vicinity of Gollierstown Bridge. This species is listed on Annex 11 of the EU Habitats Directive. A hydrogeological assessment and report is needed to determine if there will be any impacts on the ecological environment, including the



ponds. The EclA does not provide quantitative data to make substantive assessments or conclusions that construction will not impact on the habitat. Further information is therefore required.

5. Otter is a species listed on Annex II and Annex IV of the EU Habitats Directive. An Otter and Badger Survey Report has been prepared on behalf South Dublin County Council for the northern towpath. Given the evidence of the high usage by otters, the presence of at least one breeding holt per annum between 12th Lock and Hazelhatch is be expected. No construction works should be undertaken within close proximity of breeding holts except when mitigation measures have been agreed with NPWS. This may have implications for the timing of the proposed works on the Greenway. The Department welcomes the intention of South Dublin County Council to carry otter surveys in January and February 2019. It is essential that this survey work and any subsequent surveys should assess otter usage of the southern towpath. The proposed project will likely require a derogation licence to disturb otters from this Department prior to its commencement provided there is no satisfactory alternative and the derogation is not detrimental to the species concerned.
6. The Department is concerned that the impacts of the project's construction phase on biodiversity have not been adequately assessed due to varying and sometimes conflicting construction proposals and the lack of detailed methodologies. Clarification is required in relation to the siting of a temporary construction compound and further information is required in relation to the methodology for drilling and the laying the electrical power and other ducting under the canal; the construction of the canal services crossing proposed close to the 12th Lock; and a proposed cycle bridge from the northern towpath adjacent to the services crossing under the canal into Brownstown. Impacts on protected species such as *Groenlandia densa* and White-clawed Crayfish, must be considered.
7. This Department is concerned at the proposal to future proof the planned Greenway scheme by including a public lighting duct amongst other ducting. The impacts of this future lighting on biodiversity, particularly bat species, should be assessed as part of the current proposal.
8. The cumulative impacts of developments proposed for the immediate area do not seem to have been considered in the EIA Screening report. No reference is made to the recent rezoning of 193.47 ha. of land south of the Grand Canal east of the 12th Lock from rural (RU) to a zoning of Enterprise and Employment (EE). In addition, the Western Dublin Orbital Route is not mentioned. The proposals for the development of Grange Castle West Business Park and the orbital road route may, if implemented, result in increased light, disturbance and human usage of the canal banks which should be assessed. Ecological survey of the south bank of the canal, including otter survey, may be required.
9. In the Otter and Badger Survey prepared, a main badger sett was identified along with an annex sett. The Department considers that works beside the main badger sett, including trenching, ducting and surfacing, will very likely interfere with this sett and may cause injury. It is therefore recommended that it be a condition of any Part 8 Permission that no works involving the use of machinery may take place within 50 m of the main sett in the period December to June inclusive, and that any works within 50 m of this sett should be agreed with the NPWS.

## **Chief Executive's Response:**

### *Mitigation*

It is noted that the Department of Culture Heritage & the Gaeltacht (DCHG) recognises that SDCC has significantly altered proposals for the Greenway in response to issues raised during the preplanning consultations and that this has helped to alleviate concerns.

### *EIA Screening*

The Environmental Impact Assessment (EIA) screening report carried out on the proposed development has been undertaken to determine whether or not the proposed development is likely to have a significant effect on the environment. This was carried out in light of the criteria listed under Schedule 7A of the Planning and Development Regulations (2001, as amended) including an assessment of any potential significant effects on biodiversity relative to the sensitivity of the project location; the project's characteristics; and the characterisation of potential impacts.

The Screening Report has concluded that the effects of the proposed development are considered not to be of likely significance, due to the minor development footprint, the characteristics and sensitivities of the receiving environment and design and mitigation measures. The overall conclusion for the screening appraisal is that, having considered the appropriate criteria, Environmental Impact Assessment for the Grand Canal Greenway is not required.

It is advised that an application was made by a member of the public An Bord Pleanála under Article 120 of the Planning and Development Regulations (2001, as amended) to direct the preparation of a full EIA for the proposed development, An Bord Pleanála decided, on the 10<sup>th</sup> April 2019 (ABP-303499-19), not to direct the preparation of such an EIA. In making its decision, An Bord Pleanála had regard to (inter alia), the EIA Screening Report prepared for the proposed development and the criteria set out in Schedule 7 of the Planning and Development Regulations (2001, as amended). This reaffirms the findings of the EIA screening report including its contents.

Furthermore, a Construction Environmental Management Plan (CEMP) will be prepared in advance of any works commencing on site. The CEMP will include mitigation measures and/or measures to safeguard the environment. The implementation of such measures will be monitored by an Ecological Clerk of Works during the construction phase of the project.

### *Impacts on *Vertigo Moulinsiana**

The EIA Screening report states that the design of the trench to accommodate ducting will be required to "ensure that potential adverse effects to the hydrology underpinning the status of this habitat is avoided".

A detailed design of the trench in the vicinity of the pond to the north of the proposed greenway route at Gollierstown will be completed in advance of all works.

The trench will be designed in this area to maintain existing water seepage volumes from the canal to the pond. Sufficient baseline hydrogeological surveys will be completed along the stretch of the proposed greenway and trench adjacent to the ponds so that a detailed understanding of seepage, sub-surface flows and volumes is established in advance of all works.

Once the existing baseline hydrogeological conditions and seepage dynamics are understood the trenching and provision of the ducting in this area will be designed so that the current hydrogeological dynamics, such as seepage flows and volumes are maintained following the completion of the proposed trenching and ducting.

The proposed designed solution will be based on a scientific understanding of the existing subsurface flows and volumes and will be prepared so that these flows and volumes can be mimicked post-construction. As part of the design solution water levels will be required to be maintained at their baseline levels during construction works. The construction works associated trenching and ducting in the vicinity of the pond will be required to be completed in as short a time frame as possible.

The effectiveness of the design solution will be evaluated by a qualifying expert hydrogeologist and engineer.

The design solution and method statement will only be implemented once it is agreed to by the National Parks and Wildlife Service (NPWS).

The implementation of the proposed approach to the trenching and ducting outlined above will ensure that works associated with the trenching and ducting can only take place where it is confirmed that the existing hydrological conditions can be maintained within the pond and fringing habitat to the north of the canal.

#### *Otters Survey*

A survey for the presence of otters and their holts has been completed on the southern side of the Grand Canal between the 12th Lock and Hazelhatch. This survey was completed between the months of February and April 2019. The results of this survey will be provided to the NPWS in advance of the commencement of the proposed works.

#### *Construction works*

A pre-construction survey of the Grand Canal between the 12th Lock and Hazelhatch will be completed prior to the commencement of construction works. This survey will be completed within the weeks prior to the proposed construction commencement date so that up to date information on the presence or otherwise of holts, couch and breeding holts can be gathered and established.

The EIA Screening and the EclA report outline the procedures to be followed in the event that works are to be completed in the vicinity of holt. Where works are to be undertaken within 150m of an active breeding holt the developer will be required to consult with the NPWS prior to such works commencing. Works within 150m of an active breeding holt will only be completed on receipt of a derogation licence, issued by the NPWS on behalf of the Department, permitting such work.

No wheeled or tracked vehicles will be used within 20m of any active but non-breeding otter holt. Breeding activity at otter holts can last for up to 21 weeks or more and it is acknowledged that in the event that a breeding holt is identified in the vicinity of the works, no works will proceed without approval of the NPWS and receipt of a derogation licence. The potential for delays to construction as a result of the presence of a breeding otter holt in the vicinity of the project for construction works is acknowledged.

#### *Derogation Licence*

It is noted in the EclA report that a derogation licence to permit works in the vicinity of otter holts is likely to be required. An otter mitigation strategy will be provided as part of any licence application to permit works in the vicinity of an otter holt.

The mitigation strategy will be required to include measures that will minimise the potential for disturbance to otters such that it can be concluded that the works to be completed under licence will not be detrimental to the maintenance of the otter population that occur along the Grand Canal.

The measures that will be required to be included in the otter mitigation strategy will include the following:

- All works areas occurring within 150m of an active breeding holt or within 20m of any active by non-breeding otter holt will be clearly marked on the ground and an exclusion zone will be established in these areas. Works will only be permitted in these exclusion zone only upon receipt or a derogation licence or where permission to proceed with works is provided by the NPWS.
- The duration of any works within 150m of an active breeding holt or 20m of any active but non-breeding holt will be minimised to as short a duration as possible.
- The extent of working hours to be completed each day will be agreed with the NPWS.
- The works area will be screened using non-transparent acoustic screening to reduce noise and visual disturbance emanating from the works area; and
- No wheeled or tracked vehicles will be used within 20m of any active but non-breeding otter holt; All works within the exclusion zone will be supervised by the project ecologist.

#### *Construction Phase Impacts*

##### Compound and Bailey Bridge

It can be confirmed that no temporary construction compound will be situated within the townland of Brownstown. No bailey bridge will be required to cross the Grand Canal and access the southern bankside of the canal during the construction works.

The temporary construction compound will be situated along the R120 to the north of the 12<sup>th</sup> Lock bridge. An existing construction compound for the R120 upgrade will be used as the temporary construction compound.

##### Directional Drilling

A methodology for the proposed directional drilling to be completed between the north of the canal and Brownstown will be prepared. The proposal to install the duct via directional drilling will ensure that the canal and the protected species supported by the canal will remain unaffected by this element of the proposed works.

The drilling will be completed in the subsurface bedrock and will not result in any changes to the hydrology of the canal and will not require any works within the canal. There will be no potential for the drilling works to result in negative impacts to species such as white-clawed crayfish or *Groenlandia densa*.

##### Canal Services Crossing

It is proposed to complete the canal services crossing by directional drilling using the proposed methodology to be provided to SDCC. As with the proposed directional drilling between the north of the canal and Brownstown the use of this method to install services across the canal will not result in any changes to the hydrology of the canal and will not negatively affect the status of any protected species supported by the canal.

##### Indicative Pedestrian/Cycle Bridge

It is advised that the 'future pedestrian cycle bridge route' indicated on drawings for the proposed development does not form part of the project for which Part 8 planning approval is sought. This may be the subject of a future Part 8 application.

##### *Public Lighting Ducting*

The project for which Part 8 planning approval is sought does not propose to install any public lighting along the Grand Canal between the 12<sup>th</sup> Lock and Hazelhatch. Further to the findings of the EIA

Screening Report that accompanies the proposed development, the provision of a public lighting duct amongst the other ducting to be installed will not in itself represent an impact to biodiversity. These findings have been reaffirmed by the aforementioned direction from An Bord Pleanála (ABP-303499-19) not to carry out a full EIA, which has had regard to (inter alia) the EIA Screening Report for the subject proposal.

In the event of any future proposals to utilise this lighting duct for the provision of lighting along the Grand Canal between the 12<sup>th</sup> Lock and Hazelhatch an assessment of the implications of the lighting to biodiversity and bat species in particular will be required. This will be dealt with as part of any future Part 8 consent process.

#### *Cumulative Impact Assessment*

##### Rezoning

Lands that have been recently rezoned for employment and enterprise to the south of the Grand Canal encompass lands from the R120 in the east to Brownstown in the west, amounting to a distance of approximately 2.5km.

A Biodiversity Management Plan has been prepared for these lands. Consultations have been undertaken with the NPWS during the preparation of the Biodiversity Management Plan.

The lands that have been rezoned will be setback by a minimum of approx. 250 metres from the edge of the Grand Canal and the Grand Canal pNHA. From the R120 to approximately 1.8km west of the R120 the area of rezoned land will be buffered from the Grand Canal by a minimum distance of approximately 250m. This buffer zone has been established by the presence of existing hedgerows and grassland and arable habitats.

For approximately 700m (in the townland of Brownstown) the rezoned lands will be set back from the Canal by a minimum distance of 30m. An earthen berm will be created along this buffer and terrestrial woodland habitat will be created on this berm. This woodland habitat will be contiguous with existing woodland habitat occurring to the south of the Grand Canal along this section of the canal so that the overall footprint of woodland habitat is increased in this area.

The Biodiversity Management Plan also stipulates that this terrestrial woodland habitat to be provided along the northern boundary of the rezoned lands in Brownstown will be maintained as a dark corridor.

There will be no potential for cumulative impacts to arise during the construction phase of the proposed greenway and the future projects within the rezoned lands. It is proposed to complete all construction works associated with the proposed greenway during 2019 and 2020. No project works are anticipated to commence within the rezoned lands until 2020.

The existence of a substantial buffer zone between the rezoned lands and the Grand Canal and Grand Canal pNHA for approximately 1.8km to the east of the R120 will provide sufficient distance between any proposed development in this area and the Grand Canal to ensure that effect of any construction or operational activities in the rezoned lands are minimised such that disturbance to the pNHA does not arise. This buffer distance along with the proposed measures to be implemented within these lands as part of the Biodiversity Management Plan will further mitigate the potential for future land use activities within the rezoned lands to result in disturbance to the Grand Canal and the Grand Canal pNHA.

The northwestern portion of the rezoned lands in the townland of Brownstown will be buffered from the Grand Canal by a minimum distance of 30m.

The provision of an earthen berm at this location, planted within terrestrial woodland tree species to be managed as terrestrial woodland habitat and the maintenance of this area as a dark corridor will ensure that any operational activities within this portion of the rezoned lands are minimised such that disturbance to the Grand Canal and the Grand Canal pNHA are minimised.

As noted above construction activities within the northwest portion of the rezoned lands will not overlap with the construction time frame of the proposed greenway.

All construction works in this portion of the rezoned lands will be required to implement measures during construction to minimise disturbance to the Grand Canal and the Grand Canal pNHA.

With the proposed buffer zone between the rezoned lands and the Grand Canal and the implementation of the Biodiversity Management Plan for the rezoned lands, the proposed greenway will not have the potential to combine with future land use activities within the rezoned lands to result in significant negative environmental effects to the Grand Canal and Grand Canal pNHA.

This consideration has been reaffirmed by the aforementioned direction from An Bord Pleanála (ABP-303499-19) not to carry out a full EIA, which has had regard to (inter alia) the EIA Screening Report for the subject proposal.

#### Western Orbital Route

The Western Orbital Route, which is a long term roads objective under the South Dublin County Council Development Plan 2016 – 2022, is indicative in nature and is yet to go through a route selection and planning approval stage.

Further to the provisions of Schedule 7 of the Planning and Development Regulations 2001, as amended), which requires the consideration of cumulative impacts in relation to existing or permitted development, it is not considered necessary or appropriate to attempt to pre-empt the cumulative impacts of this long term roads objective in combination with the proposed development.

This consideration has been reaffirmed by the aforementioned direction from An Bord Pleanála (ABP-303499-19) not to carry out a full EIA, which has had regard to (inter alia) the EIA Screening Report for the subject proposal.

#### Grange Castle West Business Park

See comments provided for rezoning above.

#### *Badgers*

The recommended conditions to protect the badger sett and minimise disturbance to breeding badgers is acknowledged.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 6 INLAND FISHERIES IRELAND ([GCGH0006](#))**

1. All works should be completed in line with the Mitigation detailed in Section 7 of the Ecological Impact Assessment. All construction works should be in line with a project specific Construction Environmental Management Plan (CEMP). The CEMP should: identify potential impacts and mitigating measures; provide a mechanism for ensuring compliance with environmental legislation and statutory consents; detail and ensure Best Construction Practices including measures to prevent and control the introduction of pollutants and deleterious matter; and identify measures to protect all watercourses.

**Chief Executive's Response:**

SDCC acknowledges the Inland Fisheries submission. SDCC are committed to implementing all mitigation measures outlined in Section 7 of the EIA report.

A CEMP will be prepared in advance of any works commencing on site. The CEMP will incorporate all mitigation measures and/or measures to safeguard the environment that are outlined in the design report that accompanies the proposed development including the EIA Screening Report.

Specific measures are outlined in the planning documentation to protect surface water bodies from pollution. All such measures, which are based on best practice, will be incorporated into the CEMP for the project and will be implemented on site. The implementation of such measures will be monitored by an Ecological Clerk of Works during the construction phase of the project.

All measures outlined in the planning documentation will be required to be implemented as part of the method statement for all works associated with the project that have the potential to present a risk of pollution to surface waterbodies.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 7 INLAND WATERWAYS ASSOCIATION OF IRELAND ([GCGH0007](#))**

1. It is noted that there are two proposed pedestrian/cycle bridges indicated in the overall site location map. The first of these immediately east of Hazelhatch bridge described as 'future Part 8'. Consideration should be given to guaranteeing unimpeded navigation on the canal when this bridge proceeds to the planning stage. The second pedestrian/cycle bridge indicated approx. 2,750 metres east of Hazelhatch bridge is not mentioned in the preliminary design report nor is it indicated on the larger scale site location plan (1413E). Clarification is sought on these matters.
2. The preliminary design report states that the construction compound will be situated in the townland of Brownstown to the south of the Canal and that a temporary bridge crossing will be put in place. The preliminary design report later describes the temporary construction compound to the north of the Canal adjacent to the R120. Clarification is sought on this matter.
3. The maxim, 'leave no trace' should guide the design and construction of the greenway. Signage, fencing, gates, railings and litter bins should only be allowed at the main access points. The idyllic, remote location and lush natural environment should be maintained.

**Chief Executive's Response:**

SDCC acknowledges the submission of the Inland Waterways Associated of Ireland.

It is advised that the 'future pedestrian cycle bridge route' indicated on drawings for the proposed development does not form part of the project for which Part 8 planning approval is sought. This may be the subject of a future Part 8 application. No other pedestrian/cycle bridges is proposed.

It can also be confirmed that no temporary construction compound will be situated within the townland of Brownstown. No bridge will be required to cross the Grand Canal and access the southern bankside of the canal during the construction works. The temporary construction compound will be situated along the R120 to the north of the 12<sup>th</sup> Lock bridge. An existing construction compound for the R120 upgrade will be used as the temporary construction compound

In reference to the note contained on the Proposed Greenway Layout Overall drawing (18\_065\_00\_1406), which conveys a proposal for a pedestrian/cycle bridge at Gollierstown, it is advised that this note was included by error. The more detailed Proposed Greenway Layout Sheet 3 of 4 Drawing (18\_065\_00\_1413) confirms that no such bridge is proposed at this location.

With reference to minimising impact on the environment, a CEMP will be prepared in advance of any works commencing on site. The CEMP will incorporate all mitigation measures and/or measures to safeguard the environment that are outlined in the design report that accompanies the proposed development including the EIA Screening Report. The provision of boundary treatment, signage and litter bins will be given due consideration during the detailed design phase of the proposed development.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 8 SHANE O'BRIEN ([GCGH0008](#))**

1. Submission supports proposal and recommends that it be implemented as soon as possible in the context that it opens commuting possibilities from Celbridge to Dublin.
2. Equivalent cycling infrastructure improvements will be required in order to encourage pedestrians & cyclists from Celbridge to the Greenway.
3. The surface should be tarmac, to ensure a smooth cycling experience (or wheelchair, buggy) and less future maintenance. The Greenway should be lit in mornings & evenings.
4. The proposed new pedestrian & cyclist bridge at Hazelhatch should be included in this project.

**Chief Executive's Response:**

SDCC acknowledges Mr. O'Brien's submission and comments.

The provision of cycling infrastructure from Celbridge is outside the scope of this Part 8 proposal and outside the jurisdiction of SDCC. This may also be the subject of a future Part 8 application in Kildare County.

In the context of the ecological sensitivity of the Grand Canal pNHA and the mitigation measures proposed as part of the proposed development in response to its accompanying Ecological Impact Assessment (EclA), no public lighting or sealed surfaces are proposed as part of the subject greenway. The sensitive design approach of the proposed development responds to issues raised by the Department of Culture Heritage & the Gaeltacht (DCHG) during the preplanning consultations.



This approach is reflected by the Environmental Impact Assessment (EIA) screening report carried on the proposed development, which has concluded that the effects of the proposed development are considered not to be of likely significance, due to the minor development footprint, the characteristics and sensitivities of the receiving environment and design and mitigation measures.

It is advised that the 'future pedestrian cycle bridge route' indicated on drawings for the proposed development does not form part of the project for which Part 8 planning approval is sought. This may be the subject of a future Part 8 application.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 9 CAROLINE O'BRIEN ([GCGH0009](#))**

1. Completion of the missing section of the Grand Canal Greenway from the 12th Lock to Hazelhatch is welcomed and it is requested that it be completed as soon as possible. It is planned to commute into the city along this Greenway and this would take one car off the road.
2. There should also be a dedicated cycle path from Hazelhatch rail station to Hazelhatch Bridge.

**Chief Executive's Response and Recommendation:**

SDCC acknowledges Ms. O'Brien's submission and note the positive comments contained within.

The provision of cycling infrastructure from Hazelhatch rail station to Hazelhatch Bridge is outside the scope of this Part 8 proposal and outside the jurisdiction of SDCC. This may also be the subject of a future Part 8 application in Kildare County.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 10 STEPHEN JOHNSON ([GCGH0010](#))**

1. Support for the development of the Grand Canal Greenway linking the 12th Lock to the bridge at Hazelhatch is expressed. The Lucan Road (R403) from Celbridge is unsafe for cyclists. It is expected that this development will open up possibilities for commuters from Celbridge. The Greenway will also have much potential for tourism.
2. An asphalt surface will be most suited to all types of users and will require the least maintenance. Given the anticipated commuter benefit, it should have lit during the winter months between 07:00-09:00 and 16:00-19:00.
3. It is requested that any gates be easily traversed by wheelchairs, side-by-side double buggies and by cargo bikes.
4. The Hazelhatch Road forms the middle section of the Arthur's Way heritage trail and cycling infrastructure should be prioritised. While it is accepted that this Part 8 consultation relates to the Greenway it is requested that the stretch of the Hazelhatch Road between the canal and the railway bridge be upgraded for pedestrians & cyclists.
5. The separate proposal for a pedestrian & cyclist bridge at Hazelhatch is noted and supported. Since the greenway will switch from the northern bank of the canal to the southern bank of the canal at Hazelhatch, there is likely to be a notable increase in the number of users crossing the narrow bridge over the canal here.

**Chief Executive's Response:**

SDCC acknowledges Mr. Stephen Johnston submission and note the positive support contained within.

In the context of the ecological sensitivity of the Grand Canal pNHA and the mitigation measures proposed as part of the proposed development in response to its accompanying Ecological Impact Assessment (EclA), no sealed surfaces or public lighting is proposed as part of the subject greenway.

The sensitive design approach of the proposed development responds to issues raised by the Department of Culture Heritage & the Gaeltacht (DCHG) during the preplanning consultations.

This approach is reflected by the Environmental Impact Assessment (EIA) screening report carried on the proposed development, which has concluded that the effects of the proposed development are considered not to be of likely significance, due to the minor development footprint, the characteristics and sensitivities of the receiving environment and design and mitigation measures.

In terms of accessibility, the greenway proposal has been designed and will be developed to cater for users with different abilities and needs including wheelchair users, people with children in buggies and those on different types of bicycles.

The provision of cycling infrastructure on Hazelhatch Road between the canal and the railway bridge is outside the scope of this Part 8 proposal. This may be the subject of a future Part 8 application.

It is also confirmed in line with the submission that that the 'future pedestrian cycle bridge route' indicated on drawings for the proposed development does not form part of the project for which Part 8 planning approval is sought. This may be the subject of a future Part 8 application.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 11 DUBLIN CYCLING CAMPAIGN ([GCGH0011](#))**

1. Support for greenway expressed in terms of potential to provide a high quality and safe walking and cycling path for commuters, local residents and visitors. This proposed section is a vital piece of infrastructural development to help connect various Greenway proposals and should be built to the necessary standard.
2. The design is not consistent with Transport Infrastructure Ireland's (TII) design guidelines for Rural Cycleways, the DTTAS Strategy for the Future Development of National and Regional Greenways, the National Transport Authority's Cycle Manual and the Design Manual for Urban Roads and Streets (DMURS).
3. The proposed 2.5 to 3.5 metre route width is noted and it is advised that TII Guidance/Standard for Irish Cycle Routes is 'Rural Cycleway Design' recommends width of 3 metres for a low volume cycle route and 5 metres for a high volume route. This route should have a standard width of at least 4 metres and should only be reduced to 3 metres in areas of constraint.
4. There is inadequate level of design detail supplied in terms of access gates, road crossings, photo montages and the bridge crossing at Hazel Hatch.
5. The preferred surface for cyclists, wheelchairs and prams is bituminous tarmac surface. The proposal to have an unbound surface is unacceptable. The existing connecting route sections in South Dublin and Kildare (Arthurs Way) are both fully bituminous sections.
6. It is disappointing that the 'future' pedestrian and cycle bridge at Hazel Hatch is not part of this development and the rationale needs to be outlined.)

**Chief Executive’s Response and Recommendation:**

SDCC acknowledges Dublin Cycling Campaigns submission and comments.

In the context of the ecological sensitivity of the Grand Canal pNHA and the mitigation measures proposed as part of the design response for the proposed development in response to its accompanying Ecological Impact Assessment (EclA), the potential environmental impact of the proposed development has been kept to a minimum including the width (2.5m to 3.5m), unbound finish (rolled and compacted quarry dust) of the proposed pedestrian/cycle route and the absence of additional canal crossings.

The sensitive design approach of the proposed development responds to issues raised by the Department of Culture Heritage & the Gaeltacht (DCHG) during the preplanning consultations.

This approach is reflected by the Environmental Impact Assessment (EIA) screening report carried on the proposed development, which has concluded that the effects of the proposed development are considered not to be of likely significance, due to the minor development footprint, the characteristics and sensitivities of the receiving environment and design and mitigation measures.

The provision of boundary treatment and access gates will be given due consideration during the detailed design phase of the proposed development.

It is advised that the ‘future pedestrian cycle bridge route’ indicated on drawings for the proposed development does not form part of the project for which Part 8 planning approval is sought. This may be the subject of a future Part 8 application.

**Chief Executive’s Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 12 IRENE O’NEILL ([GCGH0012](#))**

1. Provision for a bridge in future, any such bridge requires an opening of 3.5m high over a width of at least 4m to accommodate a range of vessel sizes.
2. Support for Part 8, broadly welcomes the proposal.
3. A number of seepages exist in the immediate vicinity of the pub at Hazelhatch on the north bank and would need to be remedied as part of Greenway development.
4. Any infrastructure or alteration should be considered in the context of the entire navigation, not just in context of the towpath.

**Chief Executive’s Response:**

SDCC acknowledges Ms. O’Neill’s submission and note comments contained within.

It is advised that the ‘future pedestrian cycle bridge route’ indicated on drawings for the proposed development may be the subject of a future Part 8 application under which bridge heights and widths will be considered.

Canal banks will be retained untouched and protected during construction and are therefore outside the scope of this proposed development and the maintenance of such is the responsibility of Inland Waterways Ireland.

A Construction Environmental Management Plan (CEMP) will be prepared in advance of any works commencing on site. The CEMP will include mitigation measures and/or measures to safeguard the

environment including any unintended impacts on the canal bank. The implementation of such measures will be monitored by an Ecological Clerk of Works during the construction phase of the project.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 13 ALISON MADDOCK ([GCGH0013](#))**

1. The Grand Canal is a Water Way with a complex ecosystem and a scenic rural location. The current towpath surface adds to both the wildlife and biodiversity of the vegetation underfoot. The current surface also adds to the charm and enjoyment of the route. This proposal for hard surface (3.5m wide) and lighting columns will destroy that link between the water's edge and the mature vegetation lining the canal bank and raises concerns in terms of increased urbanisation. It's not clear if the finished construction will overlay existing towpath at the same ground level. The towpath surface should be reinstated using a permeable material that would allow regrowth of naturally occurring grasses.
2. Improved access at both 12th lock and Hazelhatch bridges will be welcomed. Wheelchair accessibility over the entire distance should not be used as a reason for a linear park.
3. The needs of the leisure cyclist are very different to those of the commuter. The transport needs of commuting cyclists in the villages of Celbridge and Lucan could be served by main line rail and road. Tourism and leisure cycling can successfully exist side by side, however, packs of cyclists can disturb the enjoyment of other users on greenways.

**Chief Executive's Response:**

SDCC acknowledges Ms. Maddocks comments.

In the context of the ecological sensitivity of the Grand Canal pNHA and the mitigation measures proposed as part of the proposed development in response to its accompanying Ecological Impact Assessment (EclA), the potential environmental impact of the proposed development has been kept to a minimum including the width (2.5m to 3.5m), unbound finish (rolled and compacted quarry dust) of the proposed pedestrian/cycle route, the absence of additional canal crossings and the absence of public lighting columns. Furthermore, the design of the greenway has been restricted to the footprint of the existing towpath and avoids the canal bank.

The proposal relates largely to the finish of the existing northern towpath and no linear park is proposed.

The sensitive design approach of the proposed development responds to issues raised by the Department of Culture Heritage & the Gaeltacht (DCHG) during the preplanning consultations. The proposed greenway will be more suited for leisure cycling/walking rather than cycle commuting or competition cycling.

The Environmental Impact Assessment (EIA) screening report carried on the proposed development has been undertaken to determine whether or not the proposed development is likely to have a significant effect on the environment. This was carried out in light of the criteria listed under Schedule 7A of the Planning and Development Regulations (2001, as amended) including an assessment of any

potential significant effects on biodiversity relative to the sensitivity of the project location; the projects characteristics; and the characterisation of potential impacts.

The Screening Report has concluded that the effects of the proposed development are considered not to be of likely significance, due to the minor development footprint, the characteristics and sensitivities of the receiving environment and design and mitigation measures. The overall conclusion for the screening appraisal is that, having considered the appropriate criteria, Environmental Impact Assessment for the Grand Canal Greenway is not required.

It is advised that an application was made by a member of the public An Bord Pleanála under Article 120 of the Planning and Development Regulations (2001, as amended) to direct the preparation of a full EIA for the proposed development, An Bord Pleanála decided, on the 10<sup>th</sup> April 2019 (ABP-303499-19), not to direct the preparation of such an EIA. In making its decision, An Bord Pleanála had regard to (inter alia), the EIA Screening Report prepared for the proposed development. This reaffirms the findings of the EIA screening report including its contents.

**Chief Executive’s Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 14 CONOR NOLAN ([GCGH0014](#))**

1. Heritage Boat Association broadly in favour of Greenway ( )
2. No detail on proposed future foot bridge at Hazelhatch. It must provide the same clearance as current bridge so as not to obstruct navigation. Suggest 3.5m high, 4m wide
3. What plans in place for future dredging
4. What plans in place for weed cutting activities
5. Proposal must recognise that canal is a busy navigation

**Chief Executive’s Response:**

It is advised that the ‘future pedestrian cycle bridge route’ indicated on drawings for the subject development does not form of the Part 8 proposal and may be the subject of a future Part 8 application under which bridge heights and widths could be considered.

The design of the greenway has been restricted to the footprint of the existing towpath and avoids the canal bank. Dredging and weed cutting is outside the scope of the proposed development and such maintenance is the responsibility of Waterways Ireland.

Minimising impact on boats/barges will be given due consideration during the detailed design phase of the proposed development.

**Chief Executive’s Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 15 NIALL CHARELTON ([GCGH0015](#))**

1. Replace monoculture of trees with the widest variety of native trees and shrubs
2. Replace grey squirrel with the native red squirrel. Suggests pine martin to be introduced to reduce the grey population and reds introduced later.

**Chief Executive’s Response and Recommendation:**

SDCC acknowledges Mr. Chareilton’s submission and note comments contained within.

The proposal relates largely to the finish of the existing northern towpath. Any landscaping works will be given due consideration during the detailed design phase of the proposed development. This will be subject to a Construction Environmental Management Plan (CEMP), which will be prepared in advance of any works commencing on site.

The control of invasive species is outside the scope of the proposed development.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

**SUBMISSION NO. 16 SUSAN MCBENNETT**

1. Construction of the greenway is supported particularly as a potential commuter route from Kildare to Dublin. Completing this section of the greenway will be of great benefit to the areas and residents along the full length. The success of the greenways/blueways prove as examples of the rewards gained from such investment. ([GCGH0016](#))

**Chief Executive's Response:**

SDCC acknowledges Ms. McBennett's submission and note comments contained within.

**Chief Executive's Recommendation:**

No recommended variation or modification to the proposed development.

## 12. 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 Greenway route scheme within South Dublin County including a portion of which is in Kildare County Council administrative area.