

COMHAIRLE CONTAE ÁTHA CLIATH THEAS
SOUTH DUBLIN COUNTY COUNCIL



South Dublin County Council Meeting

13th July 2020

Part 8 Report on Proposed Corkagh Changing Rooms Pavilion at Corkagh Park, Clondalkin Dublin 22.

Pursuant to the requirements of the Planning and Development Act (as amended) and Planning and Development Regulations- Part 8 South Dublin County Council gave notice of the proposal to construct a changing room pavilion at Corkagh Park, Clondalkin Dublin 22.

The Proposed site is located in Corkagh Park in the outskirts of Clondalkin lying North of the N7 and East of the R136 Outer Ring Road in the outskirts of Clondalkin. Formerly part of Corkagh Demesne, Corkagh Park, comprising approximately 120 acres stretches West of Clondalkin Town. The Park provides many amenities and activities to the area such as a playground, fairy woods, a rose garden, sports facilities, areas for walking and jogging, a cycle track, fishing lakes and picnic areas. The proposed development is for a single storey changing rooms pavilion, located on the western side of the park, close to the Grange Castle Golf Club.

The outline details of the proposal are as follows:

- 6 No. team changing rooms
- Accessible facilities including WC and referee's changing room.
- 2 No. Storage facilities for team equipment and Plant room.
- All associated works and services
- Installation of CCTV for security

The proposal has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) and screening for Environmental Impact Assessment and a Flood Risk Assessment has been carried out. The Planning Authority has made a preliminary examination of the nature, size, and location of the proposed development. The authority has concluded that there is no real likelihood of significant effects on the environment arising from the proposed development and a determination has been made that an Environmental Impact Assessment (EIA) is not required. Any person may, within 4-weeks from the date of publication of this notice, apply to An Bord Pleanála for a screening determination as to whether the development would be likely to have significant effects on the environment.

Drawings of the proposed development were on public display at County Hall, Tallaght, Dublin 24 and Clondalkin Civic Offices, Dublin 22, during normal working hours and on <http://www.sdcc.ie/>, during the period **from 27th February 2020 to 15th June 2020.**

Please note that the public consultation period was extended to the 15th June 2020 as per order S251A.

The plans and particulars can be viewed on the Council's Public Consultation Portal website <http://consult.sdublincoco.ie>

Submissions or observations with respect to the proposed development dealing with the proper planning and sustainable development of the area in which the proposed development will be situated could be made in writing up to **5 pm on the 15th June 2020** and submitted either via:

Online Submissions: <http://consult.sdublincoco.ie>

or

Post to:

**Senior Executive Officer,
Environment Water and Climate Change Department,
South Dublin County Council,
County Hall, Tallaght, Dublin 24 YNN5.**

Site notice was erected on 27.02.2020

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 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

A briefing on the proposals was given to the Clondalkin Area Committee Members prior to the Part 8 commencement.

1.3.2 Statutory Consultation

The proposed development and accompanying Appropriate Assessment report were placed on public display for the statutory period from the 27th February 2020 to 15th June 2020

Copies of the plans and particulars of the proposed scheme were available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy at the following locations:

- South Dublin County Council Offices, County Hall, Tallaght, Dublin 24 between the hours of 9:00am – 5:00pm Monday to Thursday and 9:00am - 4:30pm on Friday. Closed at weekends and bank holidays. **(Inspection and purchase)**
- **Please note due to Covid-19 South Dublin County Council Offices are closed to the public.**
- The plans and particulars could be viewed on the Council's Public **Consultation Portal** website <http://consult.sdublincoco.ie>

Submissions or observations with respect to the proposed development dealing with the proper planning and sustainable development of the area in which the proposed development will be situated could be made in writing up to 5:00pm on the 15th June 2020 and could be submitted either: **via Online Submissions:** <http://consult.sdublincoco.ie> **or By post to :**

Senior Executive Officer, Environment Water and Climate Change Department, South Dublin County Council, County Hall, Tallaght, Dublin 24. D24 YNN5.

A total of 5 submission were received by 5.00pm on the 15th June 2020.

2. Proposed Development

2.1 Description of the Proposed Development

The outline detail of the proposed changing room pavilion is as follows:

- 6 No. team changing rooms
- Accessible facilities including WC and referee's changing room.
- 2 No. Storage facilities for team equipment and Plant room.
- All associated works and services
- Installation of CCTV for security

2.2 Plans and Details

Plans and details are available at the following link:

<http://consult.sdublincoco.ie>

3. List of Submissions

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

- **Inland Fisheries Ireland**
- **South Dublin Conservation Society**
- **National Monuments Service, Dept of Culture Heritage, and the Gaeltacht.**
- **National Parks and Wildlife Service, Department of Culture, Heritage, and the Gaeltacht**
- **Geological Survey Ireland**

4. Issues Raised and Chief Executive's Responses

4.1 Introduction

This section presents each submission and includes 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.

Submission 1: Inland Fisheries Ireland (IFI) - SD-C131-C9012-2 Gretta Hannigan

IFI are not opposed to the principle of developing a sports facility at this location, and made the following observations:

Wastewater holding tank and pump should not be susceptible to flooding. Clarification is required on the possible impact of malfunction of the pumps and or power failure on the associated watercourses and the river Camac. Detail requested on ownership, operation and maintenance of the pumps.

Construction works should be in line with a project specific Construction Environmental Management Plan (CEMP). The CEMP should identify potential impacts and mitigating measures, it should provide a mechanism for ensuring compliance with environmental legislation and statutory consents. The CEMP should detail and ensure best construction practices including measures to prevent and control the introduction of pollutants and deleterious matter to surface water and measures to minimise the generation of sediment and silt.

Chief Executives Response and Recommendation:

A flood risk assessment was carried out by AWN Consultants and included in the Part 8 documents. All recommendations will be incorporated at the detailed design stage as proposed in the report. The following was the conclusion contained within the report:

"A Stage II Flood Risk Assessment was undertaken in accordance with the Flood Risk Management (FRM) Guidelines. According to FRM Guidelines a justification test was not required as the proposed project is a water compatible development. The sequential approach for flood risk assessment, as outlined in the FRM guidelines, was undertaken. As the site is within Flood Zone A i.e. a flood event has a 1 in 10 chance of occurring or being exceeded in any given year, a Stage II Flood Risk Assessment was undertaken. Two site visits were carried out Thursday 6th February 2020 with an additional walkover undertaken on 12th of February 2020 (following the Storm Ciara).

The site currently is a mixture of hard stand (road and carpark with surface water drainage) and greenfield. The proposed development has planned measures to manage the surface run-off. These include the utilisation of a sedum roof and permeable paving.

As the has a high percentage of hardstand there will be minimal increase in run-off post any development.

Overall, it is concluded that this proposed development is not at risk from flooding with the proposed finished floor level for the development at 76.053m AOD which is circa 500mm above the 1:1000-year AEP flood level of 75.56m AOD and 900mm above the 1:100year AEP river flood level of 75.15m AOD in the nearby River Camac.

The development is classified as "water compatible" as per OPW FRM Guidelines and as such the proposed sports pavilion is appropriate for lands within Flood Zone A."

All construction works will be in compliance with environmental legislation and statutory consents. SDCC will prepare a Construction Environmental Management Plan (CEMP) prior to commencement on site to identify potential impacts and mitigating measures and provide a mechanism for ensuring compliance with environmental legislation and statutory consents.

It is the policy of the Council to work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote investment in the water and drainage network to support environmental protection and facilitate the sustainable growth of the County – (Section 7.1.0 Water Supply & Wastewater - Policy IE1 Water & Wastewater). It is also the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive and Sustainable Drainage Systems (SuDS) and Integrated Constructed Wetlands (ICW) The Greater Dublin Strategic Drainage Study (GSDSDS). (Section 7.2.0 Surface Water & Groundwater- Policy IE2 Surface Water & Groundwater).

The proposed foul water pumping station and holding tank will be located in an area outside of any flood zone within the site. The proposed foul water pumping station and holding tank shall maintain minimum setback requirements from buildings as per Irish Water Code of Practice requirements. This will ensure that flooding will not result in a malfunction of the pumps and/or power failure, therefore will not impact on the associated watercourses and the River Camac.

The final layout and design details of the proposed foul water pumping arrangement and holding tank shall be in accordance with Irish Water's Code of Practice for Wastewater Infrastructure and shall be agreed with South Dublin County Council's Water Services section before commencement of development.

The ownership, operation and maintenance agreement of the pumping arrangement is yet to be agreed upon however further discussions are required between Irish Water and South Dublin County Council on how ownership, operation and maintenance of the proposed pumping station and holding tank will proceed.

Submission 2: South Dublin Conservation Society

Submission deemed this site location to be a marsh type habitat with the potential of having high biodiversity or ecological value.

Concerns that this was not considered in the supporting documentation associated with the proposed development.

Before any works are carried out on site, South Dublin Council are requested to carry out a detailed flora and fauna survey to identify such species and to provide for the retention of any unusual or protected species within the perimeter of the development site.

Important that any construction works undertaken do not impinge on the biodiversity of the nearby Camac river nor negatively impact on its water quality. South Dublin County Council should put the necessary safeguard measures in place prior to the works commencing.

In the light of several archaeological discoveries found throughout Corkagh Park over the last twenty to thirty years, they urge South Dublin County Council, prior to any commencement works being undertaken, to conduct a detailed archaeological assessment.

Chief Executives Response and Recommendation:

The documentation included at the Part 8 stage included both AA screening and EIA screening. Ecological surveys are currently underway at Corkagh park and these results, once received, will be taken in account at the detailed design stage. An otter survey will

be carried out due to the proximity of the River Camac to the site. All construction works will be in compliance with environmental legislation and statutory consents. A Flood Risk Assessment was carried out at the Part 8 Stage; which classified the proposals as "water compatible" as per OPW FRM Guidelines and appropriate at this location. SDCC will prepare a Construction Environmental Management Plan (CEMP) prior to commencement on site to identify potential impacts and mitigating measures and provide a mechanism for ensuring compliance with environmental legislation and statutory consents to ensure works will not impact negatively on the river or the water quality. It is the policy of the Council to manage surface water and to protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive and Sustainable Drainage Systems (SuDS) and Integrated Constructed Wetlands (ICW) The Greater Dublin Strategic Drainage Study (GDSDS). (Section 7.2.0 Surface Water & Groundwater- Policy IE2 Surface Water & Groundwater). A suitably qualified archaeologist will be engaged during the first stages of work as topsoil is moved on the site.

Submission 3: National Monuments Service, Dept of Culture Heritage and the Gaeltacht.

Recommended that archaeological monitoring be included in any grant of planning permission that may issue.

Chief Executives Response and Recommendation:

A suitably qualified archaeologist will be engaged during the first stages of work as topsoil is moved on the site. Should archaeological material be found during the course of monitoring, the archaeologist may have work stopped pending a decision on how best to deal with the archaeology. In which case; South Dublin County Council will be advised by the National Monuments Service, regarding any mitigation measures necessary, to ensure preservation of any features of archaeological interest found.

Submission 4: National Parks and Wildlife Service, Department of Culture, Heritage and the Gaeltacht

Recommendation to carry out an Otter Survey prior to proceeding.

Chief Executives Response and Recommendation:

South Dublin County Council will have the River Camac in the vicinity of the proposed development surveyed for the presence of otters by a suitably qualified ecologist. This survey report will set out measures considered necessary to mitigate the impact of the proposed development and this report will be referred to The National Parks and Wildlife Service and to the South Dublin County Council Heritage Officer.

Submission 5: Geological Survey Ireland

There are no County Geological Sites (CGS), as adopted under the National Heritage Plan located in close proximity of the proposed development site but that there is a site located directly across the road from Corkagh Park at Belgard Quarries.

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. They would strongly recommend that this database be consulted as part of any baseline geological assessment of the proposed development. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the development.

With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. They recommend using the GSI's National Aquifer and Recharge maps on our Map viewer to this end. They recommend that other groundwater related data available on online databases is used within the EIAR assessment in terms of groundwater wells and springs, aquifer vulnerability, subsoil permeability, and drinking water protection areas.

Should development go ahead, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out.

Chief Executives Response and Recommendation:

Noted. The site was considered for Integrated Constructed Wetlands at the preliminary design stage but was not considered suitable.

5.0 County Development Plan 2016-2022

The lands are zoned – South Dublin County Council Development Plan *Zoning Objective 'OS': 'To preserve and provide for open space and recreational amenities'* The zoning of the site supports a pavilion development and the criteria as applicable from the Development Plan supports the design proposed. The proposed development complies with the relevant Development Plan policies.

The development plan policies that affect the site directly - To preserve and provide for open space and recreational amenities Zoning Objective 'OS'- are the following:

ECONOMIC AND TOURISM (ET) Policy 7 Leisure Activities

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

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).

COMMUNITY INFRASTRUCTURE(CI) Policy 12 Open Spaces

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

CI12 Objective 1:

To support a hierarchy of open space and recreational facilities based on settlement size and catchment.

CI12 Objective 3:

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

CI12 Objective 4:

To support and facilitate the development of indoor and outdoor recreational facilities and playspaces in larger parks to cater for all age groups and abilities.

This proposed modest development of the site would not affect the character of the adjoining lands and is consistent with the County Development Plan. The design seeks to reinforce existing land use. The proposals as submitted for Part 8 Public Consultation are in compliance with the County Development Plan Policy and Objectives as outlined above.

6.0 Recommendation

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

It is recommended that, as the proposal is in conformity with proper planning and sustainable development and is supported by the Council's Sports Pitch Strategy, the Council proceed with the Part 8 proposal to construct a changing rooms pavilion at Corkagh Park ,Clondalkin, Dublin 22.