

COMHAIRLE CONTAE ÁTHA CLIATH THEAS
SOUTH DUBLIN COUNTY COUNCIL



**South Dublin County Council Meeting
14th November 2022**

Part 8 Report

**PROPOSED UPGRADE OF ST CUTHBERT'S PARK IN THE TOWNLAND OF KILMAHUDDRICK AND
DEANSRATH, CLONDALKIN, DUBLIN 22**

Pursuant to the requirements of the relevant Planning Acts and Regulations, South Dublin County Council gave notice to upgrade St Cuthbert's Park.

The development will consist of:

- Proposed hard-surfaced primary walking/ cycling route with public lighting; traversing east-west, through the park;
- Proposed hard-surfaced secondary walking/ cycling routes through the park;
- 3 No. Nodal points with seating as required;
- Proposed on-street car parking and pedestrian crossing points (subject to detailed design with SDCC Roads Dept.);
- Proposed vantage point, seating and signage;
- Proposed Teenspace area with equipment, seating and surfacing;
- Proposed outdoor exercise area with calisthenics or similar;
- Proposed natural and equipped playspaces for children;
- Proposed performance/ events area;
- Proposed dogs off-leash area with dog-friendly features;
- Proposed arboretum with edible fruits and nut trees;
- Proposed grass sports pitches;
- Proposed Multi Use Games Area (MUGA) with floodlighting;
- Proposed play/exercise trail along the walking / cycling routes.
- Proposed new planting to include: wildflower grassland with drifts of native bulbs; formal avenue trees; informal tree groups; community woodland; informal tree groups with native species; and other planting as required;
- Vegetation clearance of St Cuthberts Church, Moated Site and Graveyard Site and further assessment of works to conserve the structure as advised; (Monuments of Archaeological Interest and a Protected Structure);
- Seating, bicycle parking and signage;
- Works to boundaries, accesses and entrances;
- All associated landscape design including furniture and planting;
- All ancillary works.

The areas for the proposed works are within the curtilage of a Protected Structure (RPS133) and Monuments of Archaeological Interest (DU017-038001-/02-/03-) located within the subject site.

The proposal has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) and screening for Environmental Impact Assessment (EIA) under the EIA Directive 2014/52/EU. 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 EIA is not required. Any person could, 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.

The plans and particulars of the proposed development were available for inspection online on the Council's Public Consultation Portal website (<http://consult.sdublincoco.ie>) during the period from 20th September 2022 to 2nd November 2022.

Submissions and 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 2nd November 2022 and submitted online at <https://consult.sdublincoco.ie/en/consultation/st-cuthberts-park-design-plan-clondalkin>

or by post to:
Senior Executive Officer,
Environment Water and Climate Change Department,
South Dublin County Council,
County Hall, Tallaght, Dublin 24 YNN5.

It should be noted that the Freedom of Information Act, 1997-2006 (as amended) applies to all records held by South Dublin County Council. South Dublin County Council's Personal Data Privacy Statements can be viewed at www.sdcc.ie and all personal data will be retained in line with statutory requirements.

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
- A summary of the issues raised in the submissions made during the consultation period and 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.

2. Proposed Development

2.1 Description of the Proposed Development

The proposed upgrade of the St Cuthbert's Park at Killmahuddrick and Deansrath, Clondalkin, Dublin 22 will consist of:

- Proposed hard-surfaced primary walking/ cycling route with public lighting; traversing east-west, through the park;
- Proposed hard-surfaced secondary walking/ cycling routes through the park;
- 3 No. Nodal points with seating as required;
- Proposed on-street car parking and pedestrian crossing points (subject to detailed design with SDCC Roads Dept.);
- Proposed vantage point, seating and signage;
- Proposed Teenspace area with equipment, seating and surfacing;
- Proposed outdoor exercise area with calisthenics or similar;
- Proposed natural and equipped playspaces for children;
- Proposed performance/ events area;
- Proposed dogs off-leash area with dog-friendly features;
- Proposed arboretum with edible fruits and nut trees;
- Proposed grass sports pitches;
- Proposed Multi Use Games Area (MUGA) with floodlighting;
- Proposed play/exercise trail along the walking / cycling routes.
- Proposed new planting to include: wildflower grassland with drifts of native bulbs; formal avenue trees; informal tree groups; community woodland; informal tree groups with native species; and other planting as required;
- Vegetation clearance of St Cuthberts Church, Moated Site and Graveyard Site and further assessment of works to conserve the structure as advised; (Monuments of Archaeological Interest and a Protected Structure);
- Seating, bicycle parking and signage;
- Works to boundaries, accesses and entrances;
- All associated landscape design including furniture and planting;
- All ancillary works.

2.2 Plans and Details

Plans and details were available at the following link:

<https://consult.sdublincoco.ie/en/consultation/st-cuthberts-park-design-plan-clondalkin>

3 Outline of Public Consultation

3.1 Background to the Park and the Project

St Cuthbert's Park is a 12.71 hectare local park in South Dublin County located less than 0.5km south of the Grand Canal at Deansrath. It forms the public open space for the Deansrath, Kilmahuddrick and Bawnogue neighbourhoods. It has good natural surveillance as it is overlooked from most sides by housing. A social housing development at St. Cuthbert's Meadows has been recently completed. Deansrath Community College lies immediately east and St Ronan's National School immediately south. A new community is planned and under development to the north of the canal within Clonburris SDZ.

It has been felt for several years that the park was not achieving its potential and delivering amenity to the local community and the park was subject to issues of vandalism, crime, and anti-social behaviour. To help combat these issues and to allow for increased community use, a multi-faceted and partnership approach has been developed under the auspices of the High-level Task Force for St. Cuthbert's Park. This task force involves SDCC elected members and SDCC officials, An Garda Siochana, community representatives and other stakeholders. SDCC wish to bring the park back to life with a renewed focus on meeting the needs of the communities that live and surround it. SDCC's vision is to create a safe, clean environment for people of all ages to meet, exercise and enjoy nature. The park should be a source of pride for the local community and a place they feel ownership of.

A key element to the project is local community and stakeholder engagement.

3.2 Informal Non-Statutory Consultation

Local Councillors and High-Level Task Force

An intense round of local area consultation for the park commenced with meetings with the Local Elected Councillors for Clondalkin on 5th July 2022 and the High-Level Task Force on 15th July 2022. Results from a 2021 survey were also incorporated into the informal consultation process. Councillors/HLTF welcomed the proposed investment in St Cuthberts Park and remained involved during the rest of the consultation processes.

Community Survey

A community survey was carried out in tandem with the informal consultation meetings and interviews, and submissions were also accepted by post and email. The closing date for the survey and the written inputs was the 4th of August 2022.

The community survey was circulated in the area with 156 received. Seven written inputs were also received via the dedicated SDCC email address. Contacts were made with all residents' groups and associations adjoining the park. The majority responded and circulated the community survey. Most of the residents' groups were represented at a Community Safety Forum consultation meeting held on the 25th of July 2022. Interviews were also held with a group of residents in Deansrath Park area.

Bawnogue Youth and Community Centre hosted a meeting of groups. Bawnogue Youth and Community Centre, Deansrath Family Centre and St. Ronan's Community Centre involved themselves in the consultation and helped to publicise the survey.

Local Clubs and Schools

Initial contact was made with Clondalkin Celtic Club and other clubs were contacted as well. All schools were contacted via phone and email. Clondalkin Youth Service participated in the Community Safety Forum consultation on the 25th of July. They publicised the survey on all their social media. An interview was held with a representative from Friends of St. Cuthbert's Park and the survey link was circulated on their Facebook Page.

Businesses

A survey was established for businesses in ACE Enterprise Park. Interviews with council officials and other stakeholders were held. Local councillors, played a significant role in mobilising community input, as has North Clondalkin Community Development Project.

The findings from the above Non-Statutory Consultation prior to part 8 was very consistent, with a primary emphasis on securing the park, making it more inviting and user friendly. Enthusiasm around the park development is high and community representatives are eager to work with SDCC to make the project work into the longer term.

Below is a summary of points raised during the Non-Statutory consultation process:

- **Potential** Not reached – poor experience, litter, safety concerns
- **Usage** Limited by lack of a range of facilities, safety concerns and lack of attractiveness
- **Safety** High levels of anti-social behaviour by a minority; drug dealing, drinking; scramblers, absence of lighting; CCTV
- **Dumping and Vandalism** Littering; household waste, building and renovation materials; broken glass; burning of wheelie bins, breaking of trees. Dumping attracting seagulls and rats. Regular grass cutting had contributed to reduction in dumping.
- **Absence of Play Facilities** for children and young people
- **Park Positives** – St. Cuthberts Church Heritage Site; Community Events (Family Fun Days; Movie Nights); SDCC Wardens and Garda Síochána presence and actions.

The key issues above were considered and addressed in the preliminary design/part 8 documents.

3.3 Statutory Consultation

Notice was given of the proposed development for the upgrade of St Cuthbert's Park, in the townlands of Kilmahuddrick and Deansrath, Dublin 22

Persons wishing to inspect drawings and particulars of the proposed development could do so between the period from **20th September 2022 to 2nd November 2022** as follows:

IN PERSON: Plans and particulars of the proposed development were available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy, at County Hall, Tallaght, Dublin 24 during office hours from **20th September 2022 to 2nd November 2022**.

ONLINE: <https://consult.sdublincoco.ie/browse> from **20th September 2022 to 2nd November 2022** at 5.00pm.

Submissions and 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, were made in writing up to **5.00pm on the 2nd November 2022** and were submitted:

Online: <https://consult.sdublincoco.ie/browse> or by Post to: Senior Executive Officer,
Environment Water and Climate Change Department, South Dublin County Council, County Hall,
Tallaght, Dublin 24 YNN5.

A total of 13 No. submissions were received by 5.00pm on the 2nd November 2022.

3.3.1 List of Submissions

13 No. submissions were received during the specified period of the public consultation in respect of the proposed development from the following:

1. SD-C242-OEERE-1 Deirdre Lynch
2. SD-C242-OEERE-2 Bertrand Walsh
3. SD-C242-OEERE-3 Rath Gael Residents Association
4. SD-C242-OEERE-4 TII (Transport Infrastructure Ireland)
5. SD-C242-OEERE-5 Gino Kenny TD
6. SD-C242-OEERE-6 The Manager, Development Applications Unit (DAU), Department of Housing, Local Government and Heritage, Government Offices, Newtown Road, Wexford, Y35 AP90
7. An Taisce
8. Paul Doran, 27 Monastery Walk, Dublin
9. Josephine Byrne, 64 Floraville Ave, Clondalkin, Dublin 22
10. Environmental Health Service, HSE (Health Service Executive)
11. IAA (Irish Aviation Authority)
12. Senior Executive Engineer, Public Lighting, LUPT, SDCC
13. Senior Engineer, Roads, LUPT, SDCC

4. Summary of Issues Raised and Chief Executives Response and Recommendations

4.1 SD-C242-OEERE-1 Deirdre Lynch

Summary of Submission:

Request to plant trees at Deansrath/Melrose Avenue end of St Cuthberts Park.

Chief Executives Response:

The area to the north of the park (Deansrath Green) is being considered as a possible location for elderly housing and therefore not included within the upgrade of the park at this stage. Any new tree planting in this location would be considered as an integral part of any new development.

Chief Executive's Recommendation

It is recommended that no variation or modification be made to the proposed park development.

4.2 SD-C242-OEERE-2 Bertrand Walsh

Summary of Submission:

The submission welcomed the plans and made the following comments / suggestions:

- Additional CCTV coverage.
- Increased presence of park rangers
- A schedule of litter collections -include litter bins
- Consulting with An Garda Siochana in relation to anti-social behaviour mitigation
- Address the different materiality and heights of boundaries
- Address access for cyclists, wheelchairs and buggies while excluding scramblers and four-wheel bikes.

Chief Executives Response:

The submission welcoming the proposed upgrade of St. Cuthbert's Park is noted.

In relation to anti-social behaviour generally, it is recognised that whereas illegal and unwelcoming behaviour has decreased in recent years in this park, the perception of anti-social activities is still of concern to many residents in the local area. To address issues of vandalism, crime and anti-social behaviour in St. Cuthbert's Park a multi-faceted and partnership approach has been developed under the auspices of the High level Task Force for St. Cuthbert's Park which involves SDCC elected members and SDCC officials, An Garda Siochana, community representatives and other stakeholders.

It is also envisioned that the planned improvements will continue to encourage an increase in the number of genuine park users, promote community ownership and pride in the park and thereby reduce anti-social behaviour. Elements such as boundary treatments, enhanced access points, public lighting, improved recreational facilities and planting will be designed carefully to create an increased sense of security and to avoid opportunities for anti-social behaviour. As set out in the South Dublin County Development Plan 2022 – 2028:

COS5 Objective 16:

“To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing the following measures:

- Providing active frontages and maximising passive surveillance from adjacent housing and / or public thoroughfares;
- Eliminating buildings which back-on or gable-front public open spaces;
- Designing corner units with active frontage;
- Encouraging increased use through improved access and quality of facilities;
- Careful location, design and choice of surface materials and site furniture.”

Further initiatives around a multi-agency approach to tackling anti-social behaviour, crime and vandalism will also be progressed at the construction and operational stages.

SDCC will continue to monitor the situation with regards to unauthorised vehicle access at St. Cuthbert’s Park and keep it under review. The forthcoming Road Traffic (Miscellaneous Provisions) Bill, currently before Dáil Eireann, aimed at tackling the antisocial use of scrambler bikes and other off-road machines, such as quad vehicles in public parks, will also be pursued, particularly in relation to the following measures:

- Use of a motorised vehicles will be prohibited on public or private land, except in cases where there is permission from the landowner. This proposed new offence will cover places such as parks, green areas, waste ground, beaches and others, while the use of vehicles on private lands (such as farms) will not be affected.
- An Garda Síochána will be given powers to detain a vehicle used in a location where permission from the landowner has not been received.
- An Garda Síochána will also be enabled, on foot of a warrant, to enter a private premises and remove a vehicle suspected of having been used contrary to the new offence.

In response to the specific comments/suggestions made:

Additional CCTV coverage:

The provision of additional CCTV cameras within the park will be further considered at detailed design stage in conjunction with An Garda Síochána and subject to the requirements of legislation.

Increased presence of park rangers:

The duties of the park ranger are centred around engagement with the public and monitoring of the usage of the park and its facilities by park users, the ranger is in general the first point of contact for members of the public whenever an issue of a serious nature arises in the park. They monitor playgrounds and equipment for condition and damage daily and bring issues to the attention of the supervisors and maintenance staff who then address these. They also engage with the Gardai as needs be regarding anti-social behaviour in parks and in general monitor public behaviour to ensure that park bye laws are being observed, including in relation to the control of dogs within parks. The recent introduction of e-bikes into the service on a trial basis has shown that rangers can be more mobile around the larger parks and can move more easily between parks and it is hoped that more of these can be provided for use by the rangers in the future. There are a total of 14 rangers spread across the county and the service is provided on a 7- day week basis with rangers rostered on duty to cover weekends as well as week-days. The mobile ranger service will continue to monitor St. Cuthberts Park on an on-going basis.

A schedule of litter collections -include litter bins:

Litter bins will be located at the main entrances to the park, and litter collections made on a regular basis, in line with SDCCs Litter Management Plan (2020-2022).

Consulting with An Garda Siochana in relation to anti-social behaviour mitigation:

To address issues of vandalism, crime and anti-social behaviour in St. Cuthbert's Park a multi-faceted and partnership approach has been developed under the auspices of the High level Task Force for St. Cuthbert's Park which involves SDCC elected members and SDCC officials, An Garda Siochana, community representatives and other stakeholders. Liaison with An Garda Siochana will continue. In addition, the proposed spine route will encourage increased use of the park as a through route and make it more accessible for the purpose of policing, particularly by the Garda Mountain Bike Unit who already operate along the Dodder Greenway and Grand Canal Greenway.

Address the different materiality and heights of boundaries:

The condition of all existing boundaries to the park have been assessed at the preliminary design stage. With a few notable exceptions, such as around the area to the north of the park (Deansrath Green), the boundaries were found to be varied in type but mostly effective in deterring unauthorised vehicle access. A consistent style for the boundaries will be adopted going forward as future upgrading or replacement of boundaries is required.

Address access for cyclists, wheelchairs and buggies while excluding scramblers and 4-wheel bikes:

The two main entrances to the park, at St. Cuthbert's Road and Leland Road, either end of the proposed spine route, are designed to be more welcoming and accessible to users (cyclists, wheelchairs, and buggies) while excluding scramblers and quad bikes through the provision of kissing gates. The entrance areas will be surfaced in higher quality materials, defined by low walls with railings, and will include lighting, signage, and litter bins. The other key entrance at Westbourne Drive will be similarly up-graded to enhance the arrival experience. Elsewhere, the kissing gates at other existing entrances to the park will be retained and refurbished as required. The operation and success of all entrances will be kept under ongoing review and amended if necessary.

Chief Executive's Recommendation

It is recommended that no variation or modification be made to the proposed park development.

4.3 SD-C242-OEERE-3 Rath Gael Residents Association

Summary of Submission:

The submission welcomed the plans and made the following comments / suggestions:

- Consider additional lighting within the park.
- Include CCTV
- Address lack of green infrastructure proposed at Melrose/Deansrath Green
- Improvement of facilities for local football club.
- Review of perimeter boundaries and access to address problem hotspots (antisocial behaviour and dumping)

- Detailed clearing/restoration proposals for the ‘ruins’ within the park
- Continuation of hedge line along the fenceline of Rath Geal apartments within the park.
- Review Westbourne entrance area

Chief Executives Response:

The submission welcoming the proposed upgrade of St. Cuthbert’s Park is noted.

Consider additional lighting:

The lighting proposals for the park will be developed in accordance with relevant design standards for public lighting, taking due account of nearby existing trees that provide some foraging habitat for bats.

The proposed lights are located along the main spine foot/cycle path through the central part of the park and this is considered sufficient to ensure use of the parks during hours of darkness is concentrated along the spine route.

The type of lighting will be further developed at the detailed design stage.

Include CCTV:

The provision of additional CCTV cameras within the park will be further considered at detailed design stage in conjunction with An Garda Siochana and subject to the requirements of legislation.

Address lack of green infrastructure proposed at Melrose/Deansrath Green:

The area to the north of the park (Deansrath Green) is currently being considered as a possible location for elderly housing and therefore not included within the upgrade of the park.

Improvement facilities (welfare) for local football club:

The proposed facilities football club include an improved playing pitch (increased drainage), and addition of a junior pitch and access to a multi-use games area (MUGA), as well as possible on-street parking to alleviate problems on match days (subject to detailed design and liaison with SDCC Roads Section). SDCC will engage with the club and continue to support their on-going development where possible. The council will continue to examine and deliver facilities in accordance with the Sports Pitch Strategy and provision of ancillary facilities.

Review of perimeter boundaries and access to address problem hotspots (antisocial behaviour and dumping):

The condition of all existing boundaries to the park have been assessed at the preliminary design stage. With a few notable exceptions, such as around the area to the north of the park (Deansrath Green), the boundaries were found to be varied in type but mostly effective in deterring unauthorised vehicle access. A consistent style for the boundaries will be adopted going forward as future upgrading or replacement of boundaries is required.

Detailed clearing/restoration proposals for the ‘ruins’ within the park:

Given the sensitive nature of the archaeological site, it is intended that the restoration proposals will be undertaken in the following stages:

Stage 1:

Archaeological Impact Assessment of proposed project
Liaison with National Monuments Service as required

Stage 2 Post-Part 8 works on a phased basis:

Vegetation clearance to allow for structural condition survey of the church and graveyard
Topographical survey
Detailed condition survey and assessment of church and graveyard
Updated Archaeological Assessment
Development of interpretation and signage
Vegetation clearance to allow for structural condition survey of the moated site
Detailed condition survey of the moated site
Updated Archaeological Assessment
Obtaining necessary approvals and implementation of archaeological recommendations.

The first two stages will be undertaken as part of the park's upgrade programme, thereby opening-up the ruins to public view and interpretation, while the implementation of the structural works will follow-on thereafter subject to availability of funding.

Continuation of hedge line along the fenceline of Rath Geal apartments within the park to address privacy and antisocial issues:

Gaps within the existing hedgeline along the boundary of Rath Gael apartments are relatively few, and consideration to infilling these with the same hedge species will be further considered at the detailed design stage.

Review Westbourne entrance area

The Westbourne entrance area is designed in the Part 8 proposals to be more welcoming and accessible to users (cyclists, wheelchairs, buggies and maintenance vehicles) while excluding scramblers and quad bikes through the provision of kissing gates.

The area will be surfaced in higher quality materials, defined by low walls with railings, and will include lighting, signage and litter bins.

Chief Executive's Recommendation

It is recommended that no variation or modification be made to the proposed park development.

4.4 SD-C242-0EERE-4 TII (Transport Infrastructure Ireland)

No observations.

Chief Executives Response:

Noted.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.5 SD-C242-0EERE-5 Gino Kenny TD

Summary of Submission:

Welcomes the development and on-going engagement with local community and local representatives. Requests a playground within the proposals.

Chief Executives Response:

The submission welcoming the proposed upgrade of St. Cuthbert's Park and the active engagement between the local authority, the local community and the local representatives and stakeholders is noted.

Several natural playspaces are included within the Part 8 proposals and a teenspace area is also proposed within the western part of the park.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.6 SD-C242-0EERE-6 The Manager, Development Applications Unit (DAU), Department of Housing, Local Government and Heritage, Government Offices, Newtown Road, Wexford, Y35 AP90

Summary of Submission:

Having reviewed all of the development application's documentation and mapping the Department broadly concurs with the Mitigation Measures outlined in Section 8 of the Archaeological Impact Assessment (AIA) (pp 29 – 32). Therefore requests the following be included as a condition of planning permission in relation to Archaeological Requirements:

- All mitigation measures in relation to archaeology and cultural heritage set out in the Archaeological Impact Assessment St Cuthbert's Park Upgrade Works Deansrath, Dublin 22 by Daniel Noonan Archaeological Consultancy shall be implemented, except as may otherwise be required in order to comply with the following conditions.
- The applicant is required to engage the services of a suitably qualified archaeologist to carry out archaeological monitoring under licence from this Department of all groundworks within the Zone of Archaeological Notification for the three monuments and of the proposed vegetation clearance works is required. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.
- Should significant archaeological features be found, any works which would affect them shall cease pending agreement with this Department as to how they are to be dealt with. Where archaeological material/features are shown to be present, preservation in situ, preservation by record (excavation), or further monitoring may be required.
- An archaeologist will be retained as part of the Design Team at detailed design stage for the upgrade works to the park, to further advise on archaeological risk of different elements as they evolve.
- It is advised that a 'no-dig' approach to the new paths be used, whereby at detailed design stage the paths are designed to minimise digging and the potential for subsurface disturbance.

Following the groundworks and the careful removal of the vegetation the following actions required are:

- A written report detailing the results of the archaeological monitoring and an update of the Archaeological Assessment of the monuments, with mitigation measures to address the conservation measures required shall be submitted to this Department.
- Conservation engineers condition assessment of the church, and the graveyard, its boundaries, and any monuments or grave markers it contains; Creation of a topographic and building survey of the church and graveyard, to support the archaeological and conservation assessments.
- Regular liaison with this Department on the results of the assessments, for advice and the securing of any required permissions to enact the conservation measures.

Chief Executives Response:

The submission is noted.

Chief Executive's Recommendation:

It is recommended that the development proceeds as proposed with the following conditions included:

- All mitigation measures in relation to archaeology and cultural heritage set out in the Archaeological Impact Assessment St Cuthbert's Park Upgrade Works Deansrath, Dublin 22 by Daniel Noonan Archaeological Consultancy shall be implemented, except as may otherwise be required to comply with the following conditions.
- A suitably qualified archaeologist will be engaged to carry out archaeological monitoring under licence from this Department of all groundworks within the Zone of Archaeological Notification for the three monuments and of the proposed vegetation clearance works. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.
- Should significant archaeological features be found, any works which would affect them shall cease pending agreement with the Department as to how they are to be dealt with. Where archaeological material/features are shown to be present, preservation in situ, preservation by record (excavation), or further monitoring may be required.
- An archaeologist will be retained as part of the Design Team at detailed design stage for the upgrade works to the park, to further advise on archaeological risk of different elements as they evolve.
- A 'no-dig' approach to the new paths be used, whereby at detailed design stage the paths are designed to minimise digging and the potential for subsurface disturbance.
- Following the groundworks and the careful removal of the vegetation the following actions are required:
- A written report detailing the results of the archaeological monitoring and an update of the Archaeological Assessment of the monuments, with mitigation measures to address the conservation measures required shall be submitted to this Department.
- Conservation engineers condition assessment of the church, and the graveyard, its boundaries, and any monuments or grave markers it contains; Creation of a topographic and building survey of the church and graveyard, to support the archaeological and conservation assessments.
- Regular liaison with the Department on the results of the assessments, for advice as required and the securing of any required permissions to enact the conservation measures.

4.7 An Taisce**Summary of Submission:**

The submission welcomed the plans and made the following comments / suggestions:

Notes no facilities for cyclists, especially young children
Protected Structures, church and graveyard need to be safeguarded from vandalism.

Chief Executives Response:

The proposed new east-west route through the park is proposed as a shared walking and cycling route with lighting to facilitate early morning and evening use. All routes through SDCC parks are designated as shared routes for pedestrians and cyclists (in a pedestrian priority environment); these are particularly useful for people learning to cycle.

Regarding the protected structures; the comment is noted and the conditions recommended under Submission reference SD-C242-0EERE-6 apply.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.8 Paul Doran, 27 Monastery Walk, Dublin

Summary of Submission:

Submission notes SDCC's improvements to historic buildings and monuments and notes the need for improvements to the historical structures in St Cuthbert's Park. Requests that the built heritage be made more accessible in an appropriate and sensitive manner to increase awareness and appreciation of its cultural, social and economic value. The submission requests that access to the structures be improved and maintained by increased action regarding litter dumping and general maintenance. Mentions the tourism potential of the structures with links to the North of England and Southern Scotland. Requests that relevant guidance be followed to ensure: Increased understanding of the principles of architectural conservation and universal design, Improved awareness and understanding of the relevant legislation and policy, relevant guidance on preparing an access strategy, Provision of illustrated examples of successful solutions where access to historic buildings and places has been improved, Assistance in determining the practicability of works to improve access to the historic built environment.

Chief Executives Response:

SDCC fully recognise the historic significance of the ruined Church of St Cuthbert's and the important contribution it makes to the appreciation of the local heritage. The site comprises the curtilage of three Protected Structures - St. Cuthbert's Church (DU017-038001-), the associated graveyard (DU017-038002-), and the moated site (DU017-038003-). The three sites are also collectively entered as one in the Record of Protected Structures, ref RPS133. The protection and enhancement of these important features forms an integral part of the upgrade proposals for the park.

Given the sensitive nature of the archaeological site, it is intended that the restoration proposals will be undertaken in the following stages:

Part 8 Archaeological Process:

- Archaeological Impact Assessment of proposed project
- Liaison with National Monuments Service as required

Post-Part 8 works on a phased basis:

- Vegetation clearance to allow for structural condition survey of the church and graveyard
- Topographical survey

- Detailed condition survey and assessment of church and graveyard
- Updated Archaeological Assessment
- Development of interpretation and signage
- Vegetation clearance to allow for structural condition survey of the moated site
- Detailed condition survey of the moated site
- Updated Archaeological Assessment
- Obtaining necessary approvals and implementation of archaeological recommendations.

The first two stages will be undertaken as part of the park's upgrade programme, thereby opening-up the ruins to public view and interpretation, while the implementation of the structural works will follow-on thereafter subject to availability of funding.

In addition, the recommendations as set out under the response and recommendation to submission reference SD-C242-OEERE-6 apply and any relevant guidance will be followed in relation to providing appropriate access and maintenance to the structures going forward.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.9 Josephine Byrne (Clondalkin History Society), 64 Floraville Ave, Clondalkin, Dublin 22

Summary of Submission:

Submission gives a succinct but comprehensive background to the historic elements of the park. On behalf of Clondalkin History Society, welcomes the proposal to clear the vegetation from the Church, moated site and Graveyard. Assumes this will include the removal of the graffiti and the restoration of the headstones. Requests a stone pillar be erected on the site with the names of the people who are buried there and lights should be installed so that this area will become the main attraction in the park. Requests a specialist security and maintenance plan for this area of the park. Requests the site be put on a heritage trail for tourists coming to visit Clondalkin.

Chief Executives Response:

SDCC fully recognise the historic significance of the ruined Church of St Cuthbert's and the important contribution it makes to the appreciation of the local heritage. The site comprises the curtilage of three Protected Structures - St. Cuthbert's Church (DU017-038001-), the associated graveyard (DU017-038002-), and the moated site (DU017-038003-). The three sites are also collectively entered as one in the Record of Protected Structures, ref RPS133. The protection and enhancement of these important features forms an integral part of the upgrade proposals for the park.

Given the sensitive nature of the archaeological site, it is intended that the restoration proposals will be undertaken in the following stages:

- Part 8 Archaeological Process:
- Archaeological Impact Assessment of proposed project
- Liaison with National Monuments Service as required

Post-Part 8 works on a phased basis:

- Vegetation clearance to allow for structural condition survey of the church and graveyard
- Topographical survey
- Detailed condition survey and assessment of church and graveyard
- Updated Archaeological Assessment
- Development of interpretation and signage

- Vegetation clearance to allow for structural condition survey of the moated site
- Detailed condition survey of the moated site
- Updated Archaeological Assessment
- Obtaining necessary approvals and implementation of archaeological recommendations.

The first two stages will be undertaken as part of the park's upgrade programme, thereby opening-up the ruins to public view and interpretation, while the implementation of the structural works will follow-on thereafter subject to availability of funding.

In addition, the recommendations as set out under the response and recommendation to submission reference SD-C242-OEERE-6 apply and any relevant guidance and specialist advice will be sought at the detailed design in relation to providing appropriate access, maintenance and protection for the structures going forward.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.10 Environmental Health Service, HSE (Health Service Executive)

No Objection.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.11 IAA (Irish Aviation Authority)

No Observations.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.12 Senior Executive Engineer, Public Lighting, Land use planning and Transportation Dept, (LUPT), SDCC

Summary of Submission:

The submission welcomed the plans and made the following comments / suggestions:

- The Public Lighting Designer to engage with ESBI Transmission and Major Project Office to ensure the exclusion zone from the overhead distribution powerlines is maintained.
- Public Lighting and Electrical design should be designed in line with the South Dublin County Council Public Lighting Specification available on the website sdcc.ie
- Particular consideration should be given to the maintainability and durability of any equipment

Chief Executives Response:

Noted.

Chief Executive's Recommendation:

It is recommended that no variation or modification be made to the proposed park development.

4.13 Senior Engineer, Land use Planning and Transportation Dept, (LUPT), SDCC

Summary of Submission:

The Active Travel Team request widening of east-west spine footpath to a minimum of 3.5-4m to accommodate shared use for pedestrian and cyclists. The Active travel team welcome the proposed provision of a lit shared route through St. Cuthberts Park as it will connect to the proposed route that is proposed for upgrade and development to the east of the park. The result will create a coherent, off-road walking and cycling route, connecting the park and its environs to Bawnogue and via the permeability link at Bawnogue to the Fonthill Road, onwards to Clondalkin and contribute to the delivery of the Cycle South Dublin programme.

Chief Executives Response:

It is proposed that the proposed east-west shared route be 3.5m in width.

Chief Executive's Recommendation:

It is recommended that the proposed east-west shared route be 3.5m in width.

5.0 Proper planning and sustainable development

Context for the Project

National Policy

The upgrade proposals for St Cuthbert's Park have been developed in the context of:

- Project Ireland 2040: National Planning Framework
- The Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031,
- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020
- National Cycle Policy Framework 2009-2020
- Design Manual for Urban Roads and Streets

Regional Policy

Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031, including the Dublin Metropolitan Area Strategic Plan (MASP)

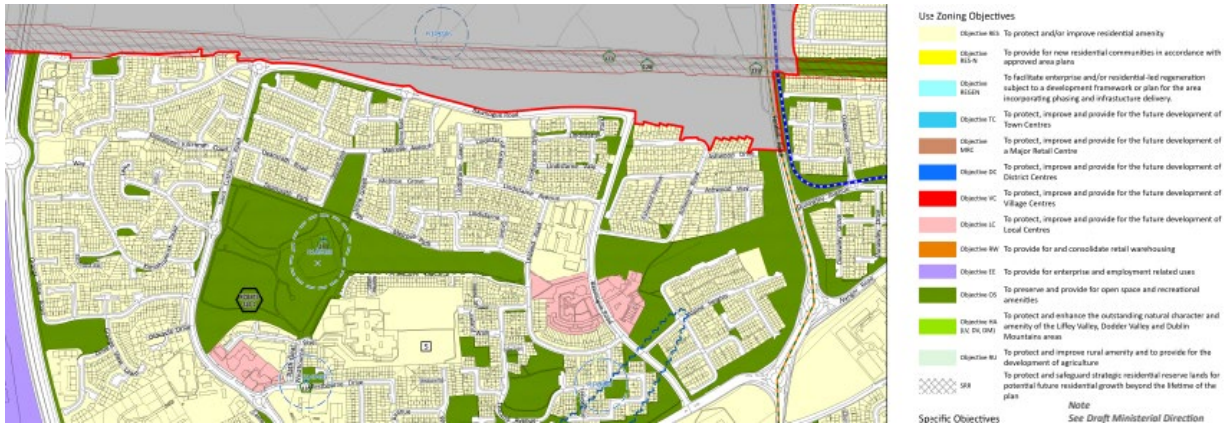
To achieve the vision the MASP identifies a number of Guiding Principles for the sustainable development of the Dublin Metropolitan Area, which include:

Metropolitan Scale Amenities – To enhance provision of regional parks and strategic Green Infrastructure, to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast, as part of the implementation of the National Transport Authority's Cycle Network Plan for the Greater Dublin Area.

County Development Plan 2022-2028

Land Use Zoning

St Cuthbert's Park is zoned in the South Dublin County Development Plan 2022- 2028 as Objective OS, 'To preserve and provide for open space and recreational amenities'.



South Dublin County Development Plan 2022-2028, Use Zoning Objectives Sheet 4 extract

The proposed development complies with the Land use zoning.

South Dublin’s County Development Plan (the Plan) sets out the framework to guide future development where a focus is placed on the places we live, the places we work, and how we interact and move between these places while protecting our environment. The aim is to progress to a more sustainable development pattern for South Dublin in the immediate and long-term future up to 2040 and beyond.

Chapter 3, Natural, Cultural and Built Heritage, Section 3.5.2 Protected Structures, sets a special landscape objective:

NCBH19 SLO2 *‘To prepare a Design Plan for St Cuthbert’s Park and to make provision for St. Cuthbert’s Church.*

Chapter 8, Section 7 ‘Parks and Public Open Space’ deals with the function, hierarchy, quality and quantity of parks and public open space in the County. As set out in the Plan, the overarching aim of the Council in the provision of parks and open space is to encourage the development of a well-connected and integrated public open space network that contributes towards achieving a broad range of policy objectives, including:

- **“Improving community, health and wellbeing** – Parks and open spaces provide a valuable role as a sanctuary for the community; the benefits of engaging with the natural world are now widely understood to be particularly beneficial to mental and physical health.
- **Enhancing visual amenity** – Parks and open spaces form an attractive green and open setting which enhances the character of urban neighbourhoods in particular.
- **Promoting sustainable development** – Parks and open spaces contribute to sustainable development objectives where they are appropriately located and accessible by walking, cycling and public transport.
- **Promoting climate change adaption and mitigation** – Parks and open spaces provide opportunities for sustainable drainage while trees and plants perform a vital role by capturing and storing carbon.
- **Reinforcing Green Infrastructure** – Parks and open spaces are core elements in the County’s green infrastructure network (see Chapter 4: Green Infrastructure).

- **Promotion of biodiversity** – Parks and open spaces offer opportunities to conserve and restore biodiversity and ecosystems. They are often focused on natural environments such as river valleys which support valuable wildlife habitats; parks also offer opportunities to increase pollinator-friendly planting.
- **Supporting culture and heritage** – Parks and open spaces often contain heritage elements and play host to many outdoor community, arts and cultural events.
- **Supporting the local economy, including tourism** – Many parks and open spaces contain facilities such as cafes, heritage features and other attractions that are valuable visitor amenities.”

It is the policy of the Plan 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.

The hierarchy of open space is a key element of the green infrastructure network, which connects and forms green corridor linkages across the County.

Objective 1 of the Green Infrastructure strategy (**Policy GI6 Human Health and Wellbeing**) of the Plan (Chapter 4) is:

“To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses.”

The Public Open Space Hierarchy outlined in Table 8.1 sets out the rationale for the existing and planned parks and open space network for the County, identifying the range of functions at each level in the hierarchy. St. Cuthbert’s Park falls within the hierarchical category of ‘Local Park’, which is defined in the Plan (Table 8.1: Public Open Space Hierarchy) as:

‘Local parks range in size from between 2 to 20ha. They provide mostly for amenity and passive recreation, although some may have playing pitches and play equipment; they are located in close proximity to homes and thereby easily accessible by pedestrians and cyclists.

Examples of local parks in South Dublin County are Vessey and Hermitage Parks in Lucan, Ballycragh Park, Firhouse Community Centre Park and Quarryvale Park.

Local Parks serve a local population within a 400m catchment.

These parks primarily consist of improved grassland but offer considerable opportunities for contributing to the local level GI network through enhancement schemes that include native trees, small woodlands, hedgerows, meadows and other planting’.

The Plan stresses that the provision of high quality public open space that is appropriately designed, located and maintained is a key element of placemaking. Public open space should have active and passive recreational value and should enhance the identity and amenity of an area.

The key principles of particular relevance to St Cuthberts Park are:

COS5 Objective 8: *To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers:*

- *provision of an appropriate mix of hard and soft surfaced areas;*
- *enhancement of biodiversity and existing trees and hedgerows;*
- *incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate;*
- *provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.*

COS5 Objective 10: *To support and facilitate the key role of parks and open spaces in relation to green infrastructure including sustainable drainage systems (SuDS), flood management, biodiversity and carbon absorption and to promote connections between public open spaces and the wider GI network.*

COS5 Objective 11: *To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan 2021-2025, the Council's Biodiversity Action Plan 2020-2026 or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.*

COS5 Objective 12: *To ensure that proposed SuDS measures are only accepted as an element of public open space where they are natural in form and integrate well into the open space landscape supporting a wider amenity and biodiversity value.*

COS5 Objective 13: *To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability.*

COS5 Objective 14: *To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1.*

COS5 Objective 15: *To support the development of passive recreation within open spaces, such as walking trails, seating provision and areas which provide for passive amenity/ hobbies, and visual interest.*

COS5 Objective 16: *To ensure that parks and public open spaces are carefully designed as safe spaces, by implementing the following measures:*

- *Providing active frontages and maximising passive surveillance from adjacent housing and/or public thoroughfares;*
- *Eliminating buildings which back-on or gable-front public open spaces;*
- *Designing corner units with active frontage;*

- *Encouraging increased use through improved access and quality of facilities'; and*
- *Careful location, design and choice of surface materials and site furniture.*

COS5 Objective 17: *To ensure that incidental areas of open space which do not function as useable open space and/or are not clearly visible from the public realm, are designed out of a proposed scheme.*

SDCC are currently preparing a Local Area Plan for Clondalkin as set out in Chapter 9, Economic Development and Employment:

EDE4 Objective 14: *'To prepare a LAP for Clondalkin, the extent of the boundary to be defined, which will be guided by the Local Area Plans Guidelines for Planning Authorities, 2013 (Department of the Environment, Community and Local Government) or any superseding guidelines and which will incorporate:*

- *A vision for the development of Clondalkin;*
- *Wider urban design principles;*
- *Framework plans for larger infill sites;*
- *A Conservation Plan;*
- *A local Green Infrastructure strategy derived from the County GI Strategy;*
- *Local Transport Plan.*

Planning Recommendation

The proposed development is in accordance with the 'OS' land use zoning objective of the area and would not adversely impact on the residential amenity of the adjoining residential lands. It is considered that the proposed development is consistent with the County Development Plan and the proper planning and sustainable development of the area.

6. Chief Executives Recommendation

Having regard to the nature and extent of the proposed project, it is considered that the proposed development is in accordance with the South Dublin County Development Plan 2022-2028 and the proper planning and sustainable development of the area.

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 at the detailed design stage, operational stages and as outlined in the foregoing report and as set out in the modifications below.

It is recommended that, as the proposal is consistent with the County Development Plan and the proper planning and sustainable development of the area, that the Council proceed with the Part 8 proposal for the upgrade of St Cuthberts Park in the townland of Kilmahuddrick and Deansrath, Clondalkin, Dublin 22 with the following modifications:

- It is proposed that the proposed main east-west shared route through the park be 3.5m wide.
- All mitigation measures in relation to archaeology and cultural heritage set out in the Archaeological Impact Assessment St Cuthbert's Park Upgrade Works Deansrath, Dublin 22 by Daniel Noonan Archaeological Consultancy shall be implemented, except as may otherwise be required to comply with the following conditions:
- A suitably qualified archaeologist will be engaged to carry out archaeological monitoring under licence from this Department of all groundworks within the Zone of Archaeological Notification for the three monuments and of the proposed vegetation clearance works. No sub-surface work should be undertaken in the absence of the archaeologist without his/her express consent.
- Should significant archaeological features be found, any works which would affect them shall cease pending agreement with the Department as to how they are to be dealt with. Where archaeological material/features are shown to be present, preservation in situ, preservation by record (excavation), or further monitoring may be required.
- An archaeologist will be retained as part of the Design Team at detailed design stage for the upgrade works to the park, to further advise on archaeological risk of different elements as they evolve.
- A 'no-dig' approach to the new paths be used, whereby at detailed design stage the paths are designed to minimise digging and the potential for subsurface disturbance.
- Following the groundworks and the careful removal of the vegetation the following actions are required:
- A written report detailing the results of the archaeological monitoring and an update of the Archaeological Assessment of the monuments, with mitigation measures to address the conservation measures required shall be submitted to this Department.
- Conservation engineers condition assessment of the church, and the graveyard, its boundaries, and any monuments or grave markers it contains; Creation of a topographic and building survey of the church and graveyard, to support the archaeological and conservation assessments.

- Regular liaison with the Department on the results of the assessments, for advice as required and the securing of any required permissions to enact the conservation measures.