

COMHAIRLE CONTAE ÁTHA CLIATH THEAS
SOUTH DUBLIN COUNTY COUNCIL



South Dublin County Council Meeting

13th November 2023

Chief Executive Report on the Proposed Synthetic Grass Sports Pitch at Knocklyon Park, Ballycullen, Dublin 16.

Pursuant to the requirements of the relevant Planning Acts and Regulations, South Dublin County Council gave notice to construct the following development in the townland of Ballycullen:

The proposals are:

- The construction of a synthetic grass 3G all-weather sports pitch to a maximum size of 140m X 90m.
- A 6.4-meter-high perimeter weld-mesh type fence.
- A 13-metre-high ball-stop fencing at the rear of each goal.
- 6 no. floodlighting columns with floodlights.
- All related hard and soft landscape works including connecting footpaths and associated planting.
- Storage Areas.
- All ancillary works.

The proposal underwent 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 made a preliminary examination of the nature, size and location of the proposed development. The authority concluded that there is no real likelihood of significant effects on the environment arising from the proposed development and a determination was made that an EIA is not required. Any person could have, within 4-weeks from the date of publication of the public 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 29th April 2023 to 9th June 2023. Printed plans and particulars 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 29th April 2023 to 26th May 2023. 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 5pm on 9th June 2023 and could be submitted either via:

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

Or Post to:

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

Submissions were requested to be by one medium only. All submissions were to include a name and a contact address. 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 consider and 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
- An Bord Pleanála decision on screening determinations
- List of submissions received during the consultation period. (See Appendix A)
- 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 Sports Pitch Strategy

SDCC's Sports Pitch Strategy identified the need for the provision of Artificial Grass Pitches in South Dublin:

<http://www.sdublincoco.ie/Meetings/ViewDocument/65360>

2.2 Site Selection

Prior to the preliminary design stage, the site at Knocklyon Park, Ballycullen was selected via a feasibility / site selection process, which examined the recommendations within SDCC's Sports Pitch Strategy and the locations available within the proposed area for an Artificial Grass Pitch. The outcome of the site selection stage was presented to the County Council in March 2022:

Recommendation:

<http://www.sdublincoco.ie/Meetings/ViewDocument/74474>

Site Selection presentation:

<http://www.sdublincoco.ie/Meetings/ViewDocument/74482>

Technical Feasibility Report:

<http://www.sdublincoco.ie/Meetings/ViewDocument/74485>

Sports Development Report:

<http://www.sdublincoco.ie/Meetings/ViewDocument/74486>

2.3 Description of the Proposed Development

The outline details of the proposal at Knocklyon Park, Ballycullen, are as follows:

- The construction of a synthetic grass 3G all-weather sports pitch to a maximum size of 140m X 90m.
- A 6.4-meter-high perimeter weld-mesh type fence.
- A 13-metre-high ball-stop fencing at the rear of each goal.
- 6 no. floodlighting columns with floodlights.
- All related hard and soft landscape works including connecting footpaths and associated planting.
- Storage Areas.
- All ancillary works.

2.2 Plans and Details

Plans and details are available at the following link:

<https://consult.sdblincoco.ie/en/consultation/part-8-synthetic-grass-sports-pitch-knocklyon-park-ballycullen-dublin-16>

2.3 Map of the relevant area

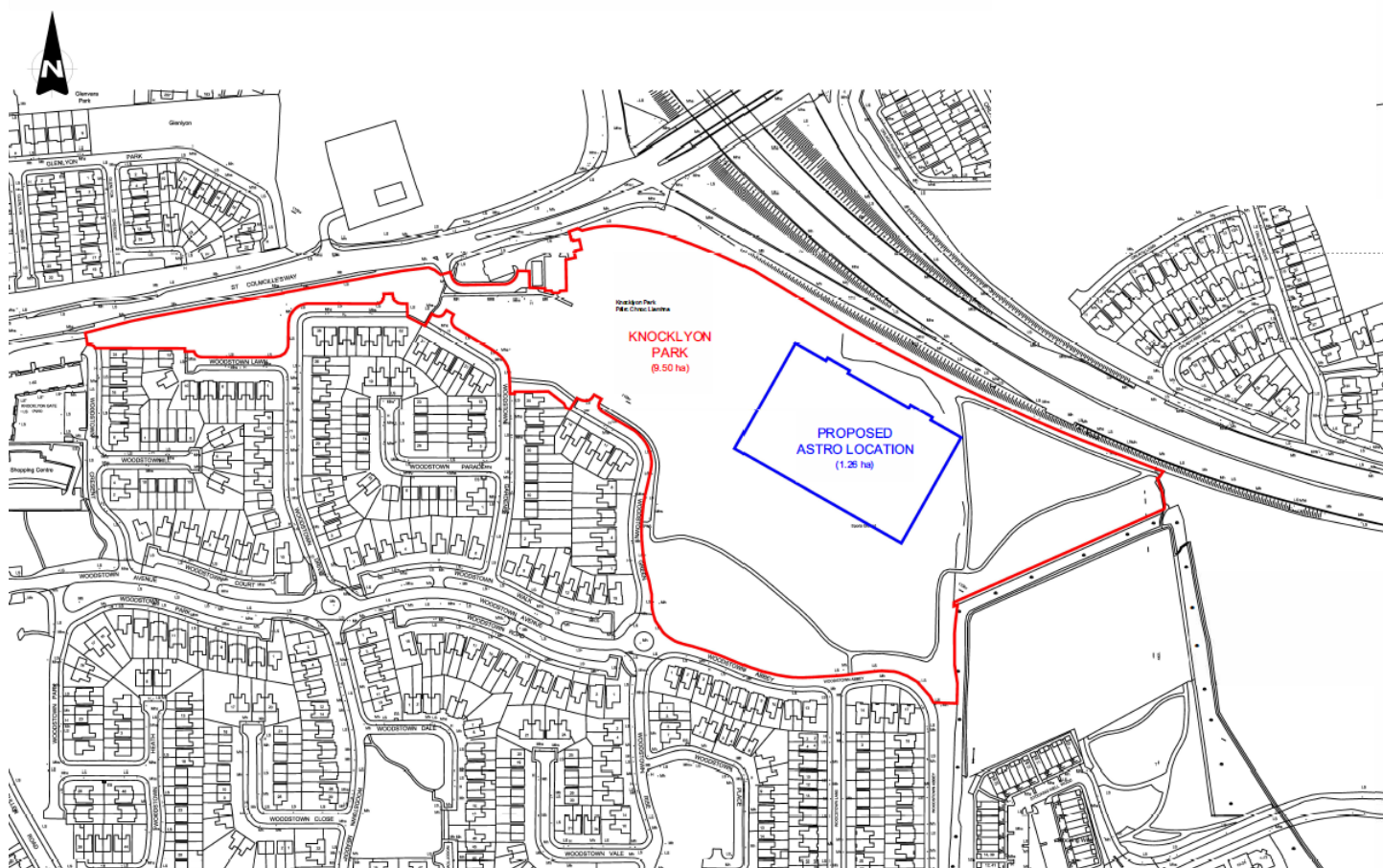


Fig 1: Map of the relevant area

2.4 Plan of the development



Fig 2: Plan of the development showing landscape integration

3. Public Consultation Process

3.1 Non-Statutory Consultation

Prior to the commencement of preliminary design, meetings were held with local stakeholders including the local GAA Club, the Residents Association and people with local environmental knowledge and concerns. In addition, a site meeting and park walk was held with residents.

3.2 Statutory Consultation

The proposed development and accompanying Appropriate Assessment report were placed on public display for the statutory period from the 29th April 2023 to the 26th May 2023.

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

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 5pm on the 9th of June 2023 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.

A total of 3,029 No. submissions were received by 5.00pm on the 9th June 2023.

4.0 An Bord Pleanála decision on the Screening Process.

The proposal underwent 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 made a preliminary examination of the nature, size and location of the proposed development. The authority concluded that there is no real likelihood of significant effects on the environment arising from the proposed development and a determination was made that an EIA is not required.

4.1 Environmental Impact Assessment (EIA) Screening Determination:

Within 4-weeks from the date of publication of the public notice, the following applicants:

- Clare Hamilton
- Ballyboden Tidy Towns clg.
- Justin Byrne
- Patricia Hunt
- Ciarán Ahern

applied to An Bord Pleanála requesting an Environmental Impact Assessment (EIA) Screening Determination (Application under Article 120 (3) (b) of the Planning and Development Regulations 2001, as amended).

An Bord Pleanála made a decision regarding an EIA screening determination for a Synthetic Grass Sports Pitch decision and notified SDCC that an EIAR was not required on the 19/09/23 as per the following decision:

<https://www.pleanala.ie/en-ie/case/317211>

In their decision they took into account the Inspector's report which notes the following:

"The proposed development is effectively an upgrading of an existing sports facility and is significantly below the threshold for urban development. Excluding the associated landscaping and footpaths, the size of the astro-turf pitch will generally mirror the size of the existing grass pitch. The design of the astro-turf pitch and associated landscaping and footpaths would not be significantly at variance with the established pattern of development on lands zoned for open space. In the context of the size of the overall Knocklyon Park, the design of the astro-turf pitches would assimilate into the wider park infrastructure."

In relation to the adjacent residential areas the Inspector's Report notes the following:

"Populated Areas

The park is surrounded by urban development, including the Woodland residential estate and road infrastructure including the M50 to the north. The design of the astro-turf pitch and associated landscaping and footpaths would not be significantly at variance with the established pattern of development on lands zoned for open space. In the context of the size of the overall Knocklyon Park the wider environs of the residential area and the road infrastructure, the design of the astro-turf

itches would assimilate into the wider populated area and park. During the construction and operation phases risk arising from pollution and nuisances listed in Section 8.3.1.6 would be controlled as part of the standard and best practice construction and operation measures. The populated areas are not considered to be environmentally sensitive and has capacity to absorb the proposed development.”

The decision of An Bord Pleanála in relation to the request for a decision on the EIAR requirements concludes as follows: *“It is considered that the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an Environmental Impact Assessment Report is not therefore required.”*

4.2 Appropriate Assessment (AA) Screening Determination:

Within 4-weeks from the date of publication of the public notice, the following applicants:

- Clare Hamilton
- Ballyboden Tidy Towns clg.
- Justin Byrne

applied to An Bord Pleanála requesting an Appropriate Assessment (AA) Screening Determination (Application under Article 250 (3) (b) of the Planning and Development Regulations 2001, as amended).

An Bord Pleanála made a decision regarding an AA screening determination for a Synthetic Grass Sports Pitch and notified SDCC that a Natura Impact Statement (NIS) was not required on the 19/09/23 as per the decision at the following link:

<https://www.pleanala.ie/en-ie/case/317212>

As part of their decision, they took into account the inspectors report which notes the following:

“Having regard to the following:

- *the nature and scale of the proposed development,*
- *the location of the proposed development and the separation distance from the Natura 2000 sites,*
- *the hydrological connection between the site and the European sites via an adjacent watercourse,*
- *the ecological connection between the site and the European sites via an adjacent watercourse and treelines and vegetation,*
- *the submission made by the local authority, including the AA Screening Report,*
- *the submissions made by the applicants requesting a determination,*
- *the report and recommendation of the Inspector,*

It is considered reasonable to conclude that on the basis of the information available, which is considered adequate to issue a screening determination, that the proposed development, either individually and in-combination with other plans or projects, would not be likely to have a significant effect on the identified Natura 2000 sites, in view of the conservation objectives of these sites and that a Stage 2 AA and the submission of a NIS for the proposed development is not required.”

In both above decisions the Inspectors report makes note of the Specific Policies in respect of Artificial Grass Pitches within SDCC’s County Development Plan as follows:

“SDCC recognises the importance of sports facilities for health and wellbeing and is committed to ensuring that all communities have access to a range of such facilities to meet a diversity of needs.”

It is the Policy CO54 to:

“ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable.”

More specifically in terms of astro-pitches, it is Objective 1 of this policy to:

“promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County, in consultation with relevant stakeholders, to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.”

Objective 19 of the policy, aims:

“To ensure where possible and appropriate, that all public all-weather pitches provided by South Dublin County Council cater for all team sports and are large enough to cater for a full-size GAA pitch.”

“There are numerous related policies in respect of social inclusion and community development, community infrastructure, public health.”

Following the decision by An Bord Pleanála regarding the requirements for EIAR and NIS, legislation provides direction to local authorities and Section 179 (3) (b) of Planning and Development Act 2001 (as amended by reg.27 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No 296 of 2018) states the following:

“The chief executive of a local authority shall, where an application is made to the Board for a screening determination referred to in article 120(3)(b) of the Planning and Development Regulations 2001, within 8 weeks after the making by the Board of a screening determination that an environmental impact assessment is not required in respect of the proposed development, prepare a report in writing in relation to the proposed development and submit the report to the members of the authority.”

5.0 Submissions Received During the Part 8 Statutory Process

The total number of submissions that were received during the public consultation period came to 3,029 No. All submissions were read, analysed and summarised. A list of all the persons/bodies that made submissions within the public consultation period is provided in Table 1 (Appendix A).

Table 1: List of Persons/Bodies that made Submissions **See Appendix A for list of all persons / bodies that made submissions.**

Of the above total number of submissions shown in Table 1, a significant proportion (486 No.), (16% of the total):

- were not accompanied by a legible submitter name.
- provided a first name only.
- provided a surname only.
- provided a first name with an initial in place of a surname only.

These submissions amounted to 486 No. which is 16% of total submissions received. As these submissions mainly included issues that had already been raised within other submissions, and in most cases were part of the ‘duplicate’ templates received (see below); they were considered within the Chief Executive Response and Recommendation and are listed in Table 1 for transparency and comprehensiveness. These submissions are also extracted out and listed in Appendix B for completeness.

See Appendix B for list of submissions submitted by an illegible name, a first name only, a surname only or a first name and initial in place of a surname only.

In addition; there were a number of different 'duplicate templates' received, and many of these templates were variations of each other. The number of different 'duplicate templates' received equals 94 No. and the number of submissions received that were part of a 'duplicate template' equals 1,878 No.

From this exercise it can be seen that, of the 3,029 No. submissions made during the public consultation process, the number of unique submissions that were received amounted to 1,245 No.

All of the submissions received by the Council during the public consultation period were read, summarised and analysed. Many of the issues raised were interrelated and were categorised under separate headings and subheadings for the purpose of providing holistic responses and recommendations. Each of the category headings are detailed in Table 2 below.

Table 2: Breakdown of Issues Raised in Submissions

Table 2 lists the issues raised within the submissions:

Issues Raised:	Issues Raised:
Proposal Welcomed	Proximity to Houses
Unspecified objection to the proposal	Microplastics and Potential Material Ban
Environmental Impact including Climate Change	Health and Well-being. Injury resulting from the Artificial Grass Pitch
Impact on existing park use and objections to the proposed new use	Anti -social Behaviour
Fencing	Ball Stop Netting
Car Parking, Traffic and Emergency access	Protected View
Lighting	Ancillary Facilities
Noise	Perceived Discrepancy in documentation / Procedural Concerns / Unsupported Allegations
Location proposed	Capital Cost of the facility and value for money. Concerns regarding size of the pitch

6.0 Summary and Categorisation of Issues Raised and Chief Executives Response

This section summarises the issues, with respect to the proper planning and sustainable development of the area in which the proposed development would be situated, raised in submissions and observations, and gives the responses of the Chief Executive followed by recommendations. The summaries, responses and recommendations are collated and categorised under relevant headings.

The responses and recommendations of the Chief Executive have been framed in a manner that takes account of proper planning and sustainable development of the area to which the development relates while having regard to the provisions of the County Development Plan and the relevant guidelines.

6.1 Proposal Welcomed (issue 1)

Summary of Issue

1. General welcoming of the proposal for additional recreational / sporting facilities.
2. Notes that the proposal will augment neighbourhood facilities
3. The provision of an all-weather pitch will improve promote activity and improve fitness.
4. Notes the requirement for such facilities in the area.

Chief Executive's Response

The submissions welcoming the proposal are noted.

Chief Executive's Recommendation

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

6.2 Unspecified objection to the proposal (issue 2)

Summary of Issue

1. Unspecified objection to the Part 8 proposal.

Chief Executive's Response

The submissions are noted.

Chief Executive's Recommendation

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

6.3 Environmental Impact including Climate Change (issue 3)

Summary of Issue

1. Concern raised that replacing the existing mown grass pitch with a 3G surface would impact on biodiversity and impact on pollinators, particularly given the recent awards to the area for actions on biodiversity and pollinators and Concern raised that the existing wildflower meadows and pollinator trail adjacent to the proposal will be impacted.
2. Concern raised that adjacent trees, hedgerows, and bushes will be removed or impacted on by their proximity to the proposal.
3. Concern raised that the proposal will impact on protected wildlife particularly bats and otter.
4. Concern raised that the proposal will impact on other flora and fauna, including birds and insects that inhabit or visit the site.
5. Concern regarding soil removal.
6. Concern regarding deforestation.
7. Concern regarding impact on nearby watercourses
8. Concern that the proposal is contrary to SDCC's Climate Change Policy / will cause an increase in car use as existing park users will travel to other parks and the Green Infrastructure Strategy
9. Concern regarding water management and water permeability
10. Concern regarding SDCC's Determination that an EIAR and AA (NIS) report were not required.
11. Concern regarding construction stage impacts
12. Concern regarding generation of waste and waste management
13. Concern about the impact of maintenance operations on the proposed pitch.
14. Concern about the requirement for eventual removal and replacement of the artificial pitch surface.
15. Concern raised about the infill material proposed for the artificial grass pitch surface and the possibility of contamination by heavy metals and other toxins.
16. Concerns about noise
17. Concern about the impact on air quality.

Chief Executive's Response

1. The proposal is to upgrade an existing grass pitch to an Artificial Grass Pitch to facilitate all weather and increased use and increase use by a variety of sports (GAA, soccer, rugby, general training). Sports pitches tend to be low in biodiversity with a dominance of low growing grass species due to the frequent mowing regime. The area proposed for the pitch is an existing GAA pitch that is cut fortnightly. Therefore, the replacement of an existing grass sports pitch with an astro pitch

does not have a high impact on biodiversity. There are no proposals to remove existing pollinator areas, existing trees or hedgerows, blackberry bushes or the existing small orchard.

Knocklyon Park includes a variety of different habitats; including areas of high meadowland that include dry and wet grassland which aided in the area winning a pollinator award. It also includes sports pitches that have frequently-cut, close mown grass. The wet and dry meadows support a wide variety of plant and insect life. The close mown grass pitches mostly support low growing grasses and, as they rarely reach flowering stage, do not support a high quantity of pollinating insects or many other forms of wildlife. The proposals do not include removing the existing meadows, trees, hedgerows or wetlands that exist within Knocklyon Park. Those areas are retained and protected as part of the Part 8 proposal. The proposal also enhances the native tree planting in the area, connecting the small pockets of woodland to larger areas of woodland and in this way improves the ecological connectivity and biodiversity of the area. The no-mow / decreased frequency mowing regime within the park currently being implemented by SDCC is not being affected by the proposal. The pollinator trail will not be removed.

2. Existing adjacent trees, hedgerows, and bushes are not affected by the proposal.

3. Impact on Protected Species

The AA Screening found that there will not be a significant impact on Natura 2000 sites, while the EclA found that there will not be a significant impact on other designated sites (such as pNHAs) or protected habitats and species.

Otter:

There is approximately 1.6km (including the eastern tributary) of the Woodstown Stream south of the M50 culvert. This length of watercourse falls far short of providing enough habitat to support the home range of an individual male or female Otter. Additionally, the stream also has a limited capacity to provide a prey base for an Otter given its small-scale physical characteristics, with the stream likely only supporting Minnow and Stickleback. The lack of salmonids and later life-stage European Eel (the core components of Otter diet) from the stream would mean that the stream does not have the capacity to support an individual Otter. Furthermore, the Woodstown Stream as a whole is notably fragmented, i.e., the M50 culvert and additional culverted sections north of the M50, which makes unsuitable for the expansion of an Otter's home range beyond that of the Woodstown Stream south of the M50.

It is confirmed that a natural sustainable infill material will be used in place of plastic infill in the proposed pitch.

Bats and provision of proposed lighting:

Concern was raised that the proposed lighting will impact on a long-standing wooded corridor which are important habitats for bats.

Further examination of the lighting design shows that there will be no light spill on this old standing wooded corridor (Fig. 3). Light spill will be restricted to younger trees to the east and the area of Hawthorn and Bramble scrub to the north which is currently lit by M50 lighting. The wooded area to the east will be further screened with increased planting as per the projects landscape plan. The lighting plan was devised to minimise impact on bats wherever possible while still maintaining useable conditions. Preliminary roost assessments were conducted from the ground by JBA Ecologists. Assessments were completed on those trees that may have been adversely affected by the proposed projects lighting and included sections of the eastern wooded corridor, the wood habitats to the south of the proposed pitches and the scrub habitat to the north. None of the trees encountered were considered have bat roosting potential. There may be trees within the long-standing wooded corridor or woods further east of this corridor that offer roosting potential as per suggested in supplementary reports, however these trees are outside the zone of influence for lighting impacts, therefore preliminary roost assessments were not deemed necessary. At height surveys were not considered necessary given the maturity and/or quality of the trees surveyed.



Fig 3: Lux levels from the proposed lighting plan. Extent of adverse lux levels do not impact on long standing wood corridor or any other wood habitats within vicinity.

All wooded areas within the site boundary and zone of influence were also assessed for bat activity to determine connectivity and potential foraging/commuting routes. Surveys were conducted following best practice guidance as set out in the Bat Conservation Trust, Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition as recommended by CIEEM and the National Road Authorities survey methodology guidance. Although bats were recorded foraging and commuting on site; bat activity was not considered to be significantly high, as determined following this guidance.

The lighting design was examined further by Sports Labs Ltd. They state that the design does not exceed the limits for the E3 environment at Knocklyon (Sports Labs Ltd, Knocklyon Park, Construction of a new 3G Synthetic Pitch, Flood Lighting Design, July 2023). As a precautionary principle it is proposed a lighting curfew of 9pm (21:00) will be implemented between 1 April to 31 August, to account for bat emergence activity. Regular bat activity monitoring is proposed for the first five years of the operational period.

Bats and provision of ball stop netting:

Bats can detect netting, and only very fine netting is used to sample bats. Mist netting is a widely used technique to sample bird and bat assemblages. Experiential evidence indicates that bats see "ordinary" netting quite well either with eyesight during the dusk period or with echolocation during darkness, and "mist type" netting is required to trap bats. For example, to avoid detection by bats a very fine thread is used for harp netting (fishing wire) and it is considered that bats that utilise high frequency are less likely to detect nets than bats with low frequency. Nets such as scaffolding netting are utilised to funnel bats into mist netting for trapping purposes. Additionally, bats are known to have an exceptionally good spatial memory, so once they have located a net they can probably avoid it easily. A net thread gauge above 1mm will be used for ball stop netting. In any case it is noted there is an existing ball stop net on site.

4. Knocklyon Park includes a variety of different habitats; including areas of high meadowland that include dry and wet grassland which aided in the area winning a pollinator award. It also includes sports pitches that have frequently-cut, close mown grass. The wet and dry meadows support a wide variety of plant and insect life. The close mown grass pitches mostly support low growing grasses and, as they rarely reach flowering stage, do not support a high quantity of pollinating insects or many other forms of wildlife. The proposals do not include removing the existing meadows, trees, hedgerows or wetlands that exist within Knocklyon Park. Those areas are retained and protected as part of the Part 8 proposal. The proposal also enhances the native tree planting in the area, connecting the small pockets of woodland to larger areas of woodland and in this way improves the ecological connectivity and biodiversity of the area.

In addition, it should be noted that the existing habitat is extensively utilised by dog walkers, recreational users and sports events and as such would not be suitable or of significant value to provide refuge or significant foraging habitat to mammals or bird species. Given the high level of human activity at this site it is not considered that significant displacement of species would be likely to occur because of the proposed development. On this basis it considered unlikely that significant impacts would arise on biodiversity.

5. Impact of Soil removal: The expected volume of soil to be excavated is 1469m³. This volume is not significant and is required for the stripping of topsoil to 100mm depth (1255m³) and a further 241m³ for other elements of the development.

6. Deforestation: No deforestation is proposed as part of the scheme.

7. Adjacent Watercourses: The Woodstown Stream is considered to be a 'Depositing Lowland River' of regional/county importance. No species were noted in it during surveys. A potential significant impact could be the degradation of the stream through a slippage event during construction. However, this is unlikely due to the separation between the stream and proposed development. During the construction and operation phases risk arising from pollution and nuisances would be controlled as part of the standard and best practice construction and operation measures. In relation to otters, which is a key issue raised by several applicants, surveys submitted by SDCC state there was no direct or indirect evidence of protected mammals at this site location. This being said, it is acknowledged that the River Dodder, which is downstream of the site has records of otters. It is considered unlikely, that the otters would be affected due to the distance to the stream, the existing vegetation around the stream (which itself is unlikely to be affected) and the nature of the stream which is culverted for large parts. While the streams are considered to be environmentally sensitive, they have capacity to absorb the proposed development subject to standard and best practice construction and operation measures. (See also paragraph on Otters Above and paragraph on AA screening below).

The amenity value of the Woodland Stream and tree-lined path mentioned in submissions will not be impacted significantly by the proposed development. The proposed development is situated in an already highly urbanised park, with the M50 and residential developments surrounding it. As such the change in environment will not be significant.

8. Climate Change/ increase in car use and Green Infrastructure Strategy:

SDCC's Sports Pitch Strategy outlines the requirement for Astro pitches to accommodate sports training and match play need in the county both now and into the future. The increasing population in the county, particularly in the age brackets that result in an increase in sports club / team numbers, the increase in female participation in organised sport and other factors, has led to increasing demand for grass pitches. Projected population growth figures predict numbers to increase further. SDCC are unable to meet demand with grass pitches alone, providing Artificial Grass Pitches at suitable locations can cater for multiple amounts of usage per week over and above grass pitch use.

In addition, at present it appears that climate change is creating a wetter environment in the winter / spring and dryer / drought conditions in the Summer. SDCC are finding that existing grass pitches are increasingly made unavailable for play due to being either waterlogged or too dry. Artificial Grass Pitches are playable in all seasons regardless of weather. The proposal to provide this Artificial Grass Pitch at a location that is already used as a sports pitch, contributes to addressing that need. Without the provision of Artificial Grass Pitches SDCC will be limited to providing for that need with multiple numbers of grass pitches. As space is limited demand will for pitches will increase and may result in areas currently designated as meadowland or other less suitable locations being re-designated as grass pitches. In addition, the over-use of existing grass pitches results in their increasing compaction leading to soil degradation and greater surface water run-off, the proposed provision of a limited number of Artificial Grass Pitches, including this one in the east of the county, will assist to reduce training and match play pressure from SDCC's existing grass pitches, thus improving their soil condition and ability to allow water to infiltrate. The Green Infrastructure Strategy for the county identifies areas of green infrastructure and aims to protect and increase their quality and where possible to connect areas of green infrastructure. The surveys and the reporting provided for the proposal show there is no adverse impact on the surrounding environment and SDCC will continue to implement best practice to ensure environmental protection during the construction and operation stages. In addition, as part of the proposal SDCC are proposing to create additional areas of native tree planting to connect ecological corridors to connect Green Infrastructure to the wider area.

Carbon Footprint to access the Artificial Grass Pitches and for existing park users to travel elsewhere:

SDCC have approved a programme of Artificial Grass Pitch provision across the county to meet a significant and growing demand for access to training and all-weather playing pitches. The proposed placement of Artificial Grass Pitches across the county allows for the accommodation of the training and playing need within each local area to be accommodated within that area. Sports clubs tell us they frequently have to travel to such facilities outside the county in order to access facilities. The dispersal of the Artificial Grass Pitches across the county, including at this proposed location, decreases the distance that local clubs / teams/ schools/ groups have to travel to use artificial grass pitches. Travel of existing users of the park to other parks elsewhere is a personal choice and there are sustainable transport options available.

9. Water Management and Water Permeability:

The existing grass pitch playing surface is quite compacted and degraded due to intensive use as a sports pitch. The proposed Artificial Grass Pitch surface, which is required to support intensive sports use, is permeable to water and will include gravel layers in the subbase which aids in filtering and attenuating surface water. The detailed design stage will examine drainage proposals further and ensure all proposals comply with SDCC policies and standards for drainage in accordance with SDCC's Natural Sustainable Urban Drainage Design Guide and best practice.

10. Concern regarding SDCC's Determination that an EIAR and AA (NIS) report were not required.

EIA Screening:

An EIA Screening exercise was carried out and SDCC determined that an EIAR was not required.

This Determination was confirmed on submission by 3rd parties to An Bord Pleanála. Full details are set out under Section 4.0 above. The decision of An Bord Pleanála in relation to the request for a decision on the EIAR requirements concludes as follows:

"It is considered that the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an Environmental Impact Assessment Report is not therefore required."

AA Screening:

The AA Screening prepared by JBA concluded that the proposed development site is connected indirectly to several Natura 2000 sites. No likely significant impacts on Natura 2000 sites were identified in the AA Screening, despite these connections.

SDCC made a determination that a Natura Impact Assessment was not required. This Determination was confirmed on submission by 3rd parties to An Bord Pleanála. Full details are set out under Section 4.0 above. As part of their decision, they took into account the inspectors report which notes the following:

"It is considered reasonable to conclude that on the basis of the information available, which is considered adequate to issue a screening determination, that the proposed development, either individually and in-combination with other plans or projects, would not be likely to have a significant effect on the identified Natura 2000 sites, in view of the conservation objectives of these sites and that a Stage 2 AA and the submission of a NIS for the proposed development is not required."

11. Construction Stage Impacts:

Having regard to the nature and scale of the proposed development and noting the mitigation measures outlined in the proposal, it is considered that the nature of the environmental impacts during the construction and operation phase are not particularly complex or intense. Temporary noise, dust and traffic impacts may arise during the construction stage, however these will be of short duration and limited frequency. The implementation of standard and best practice methodologies during the construction and operation phase of the proposed development will result in a reasonable possibility of effectively reducing potential impacts.

12. Waste Management

There is no significant production of waste. During the construction phase, routine construction waste will be generated including excavated material from the site. This is not anticipated to be of any significant level and will be managed through standard construction practices and methodologies. Waste generated during the operation stage will be managed by the maintenance section of SDCC and in accordance with SDCC's Waste Management Plan.

13. Maintenance requirements:

SDCC will be responsible for the maintenance and operation of the proposed facility and will carry out these requirements in accordance with best practice.

The use of a sustainable natural infill is proposed so the concern regarding the use of rubber / microplastic infill is negated. During the operation phases potential impacts arising from pollution and nuisances will be controlled as part of the standard and best practice operation measures.

14. Decommissioning / Disposal:

Concerns were raised regarding the decommissioning for the proposed development when it falls out of use. It is noted that this is not a temporary facility and is intended to be permanent. In any case, the decommissioning of such a facility in of itself would be subject to the appropriate planning mechanism under the prevailing legislation at such a time it is required and would be assessed based on the environmental requirements at that time.

It is confirmed that a natural sustainable infill material will be used for the proposed development. The material will be recycled on replacement, in accordance with processes which are available for the turf and any infill material to be

separated and recycled. Purpose built facilities exist in the UK for the recycling of synthetic turf, which is broken down and reformed to create new products (e.g. pitch-side kickboards). These recycling plants are relatively new but are expected to become more prevalent and accessible in future.

15. Infill Material and risk of toxins and heavy metals:

The proposed pitch will provide a facility primarily for GAA and Soccer use, while also ensuring Rugby and other such sports can be facilitated. To be used for competitive GAA and Soccer matches as well as Rugby, the new pitch shall comply with the following Governing Bodies: - FIFA Quality Handbook of Requirements (2015) - World Rugby Regulation 22 (2016) - GAA Synthetic Turf Surfaces for Gaelic Games (2022).

In light of the restrictions likely to be placed on the use of polymeric infills the Artificial Grass Pitch is proposed to proceed with a natural alternative infill option. The European Synthetic Turf Council Infill interest group is currently developing guidance on all types of infill materials, with a specific focus on non-polymeric infills that fall outside the scope of the planned new EU restriction.

Certification has been achieved on the alternative options but more focus to date has been placed on FIFA Quality (Soccer standard) and World Rugby (rugby requirements) performance requirements. Less innovation on alternative infills has been carried out on GAA systems, however there are performance similarities to both the FIFA Quality and World Rugby systems. Sports Labs Ltd. have been engaged by SDCC and are committed to the project at Knocklyon Park and with their industry expertise will support the alternative infill product through laboratory testing and certification to GAA standards, removing the risk associated to any new product being introduced into the market.

A natural sustainable infill material will be used in place of plastic / rubber infill in the proposed pitch.

16. Environmental Noise:

It is accepted that noise from the existing sport pitch area may increase slightly at certain times due to the all-weather availability of the pitch. However, this increase is not likely to be significant, as stated in the EIA Screening. For residential receptors the increase will be slight, given the closest residential receptor is approx. 75m away from the proposed pitch and the background noise levels from the adjacent M50 motorway. Noise buffers will be included in the fence construction at detailed design stage to decrease the noise from rebounding balls. Noise is not anticipated to have an impact on ecological receptors during the operation phase.

17: Air Quality:

The proposal will not influence air quality in any appreciable way. Temporary noise, dust and traffic impacts may arise during the construction stage; however these will be of short duration and limited frequency. The implementation of standard best practice methodologies during the construction and operation phase of the proposed development will result in a reasonable possibility of effectively reducing potential impacts.

Chief Executive's Recommendation

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

6.4 Impact on existing park use and objections to the proposed new use (issue 4)

Summary of Issue

1. Concern was raised that the proposal for an Artificial Grass Pitch is not suited to the location proposed.
2. Concerns were raised that existing use of the park for various recreational activities and amenity by all age groups and general amenity purposes would be impacted on or removed entirely, in particular concerns raised that existing dog walking, bat walks, bug hunts, berry picking and wildflower seed collections and other similar activities would be impacted on if the proposals go ahead.
3. Concerns were raised that the proposal discriminates against older age groups and babies, and that people, particular children and older people, would be unable to use the park as they currently do and cites discrimination against females as it is alleged mostly male teams use Artificial Grass Pitches.
4. Concern that the local club, currently allocated the existing pitch by annual allocation, would be dis-commmoded and that younger teams and female teams will be left with nowhere to play sport. Also that the club invested significant money in development of changing rooms car parks etc. for use of the adjacent 2 pitches.
5. Questions the need for the Artificial Grass pitch; that pitches lie idle for long periods and it will not be used during school hours. Also cites that school games are usually called off if it rains and demand during some of the winter months is

- minimal. Another submission cites that the provision of this one pitch will not meet the large training demand that exists.
6. Queries regarding ownership and maintenance of the facility; concern regarding the proposal to charge for use of the proposed facility and alleges change of use to a profit-making enterprise.
 7. Concern raised that existing use of footpaths would be hindered during the construction stage.

Chief Executive's Response

1. Compatibility with its location.

The proposed development is effectively an upgrading of an existing sports facility. Excluding the associated landscape proposals and footpaths, the size of the artificial grass pitch will generally mirror the size of the existing grass pitch. The design of the astro-turf pitch and associated landscaping and footpaths would not be significantly at variance with the established pattern of development on lands zoned for open space. In the context of the size of the overall Knocklyon Park, the design of the astro-turf pitches would assimilate into the wider park infrastructure. The proposed location is supported by the Sports pitch Strategy and the pre-part 8 site location and technical feasibility / selection stages.

The site is zoned for open space and is actively used for recreational amenity and adjacent to a residential area for the purposes in the development plan. The adopted development plan has been subject to AA and SEA and considered the land use and classes of development such as the that proposed would be open to consideration on lands zoned 'Open Space'. The SEA for the plan concluded that its implementation would not result in significant effects on the environment. It is noted that the development is on serviced lands in an urban area and does not constitute a significant urban development in the context of the wider city. The development is not associated with any significant loss of habitat or pollution which could act in a cumulative manner to result in significant negative effects to any Natura 2000 sites. There are no projects which can act in combination with the development which can give rise to significant effect to Natura areas within the zone of influence.

The proposed development is effectively an upgrading of an existing sports facility. The proposed development is compatible with the existing use of the land for amenity/recreational purposes and the site is zoned 'Open Space (OS)'. The Use Classes related to the zoning objective which are permitted in principle include recreational facility, sports club / facility. The submissions applicants to An Bord Pleanála that this may be a material change of use is noted, but the development plan is open to considering this type of development in its zoning objectives. It is also considered that the proposed development in the context of its zoning objective would not significantly impact adjoining zoning objectives such as 'Existing Residential (RES)' to the south of the site. Both recreational facilities and sports clubs / facilities are open to consideration in this zoning objective in 'Existing Residential (RES)' also.

2. Cited conflict between the proposal for artificial grass pitch and continued use of the park:

SDCC's parks and open spaces balance the provision of active and passive recreation, amenity and protection of the environment within them. All SDCC parks provide for a variety of active and passive recreation activities and other uses. At present the main existing active uses of Knocklyon Park includes intensive sports use by a local GAA club, walking, jogging / running, cycling, dog walking and informal ball play and other`1 informal play and ecological related activity. There are also passive uses catered for.

Similar sized parks support a variety of playgrounds, sports pitches, dog walking, walking and jogging, park runs and similar events and these uses are balanced with the provision of passive recreation and protection of biodiversity.

There are currently no statutorily protected areas within the park.

SDCC have a number of parks that also contain Artificial Grass Pitches; most recently a full soccer sized pitch at Sean Walsh Park. A new park at Airlie Park, Adamstown is being built with a GAA-sized Artificial Grass Pitch included as part of the design of the park. The proposed provision of an Artificial Grass Pitch within a public park does not equate to the destruction or removal of a public amenity. The proposal is to replace an existing grass sports pitch with an Artificial Grass Pitch. The proposal is an enhancement of an existing recreational facility to provide for increased use and is compatible with the continued use of the park as a recreational amenity. 1 No. grass pitch remains within the park and will be available for use by local sports clubs. All of the existing uses cited can still continue and are compatible with the provision of an Artificial Grass Pitch.

The existing footpath around the pitch remains unchanged and it has been enhanced by the addition of a proposed footpath that will create another looped connection; this will augment the walking / cycling amenity within the park and create different lengths of routes that can benefit people of varying levels of fitness and ability. In addition, new native tree planting is proposed within the landscape plan.. The fence around the astro will ensure that any previous concerns that may have existed regarding stray balls will now be decreased and facilitate use of the adjacent footpath.

For a park to function well it is important to have a diversity of use, plenty of passive surveillance and active usage. Having an actively-used facility, such as the proposed 3G pitch helps achieve this.

3. Discrimination against older society members, females, mothers and babies and impact on their current use of the park: SDCC's Sports Pitch Strategy outlines the requirement for Astro pitches to accommodate sports training and match play need in the county both now and into the future. The increasing population in the county, particularly in the age brackets that result in an increase in sports club / team numbers, the increase in female participation in organised sport and other factors, has led to increasing demand for grass pitches. Projected population growth figures predict numbers to increase further.

The proposal is for an upgrade of an existing grass pitch to an Artificial Grass Pitch. It is not a change of use but an intensification of it to allow more people, teams and a variety of different sports use of the pitch. The Artificial Grass Pitch can be used by whomever books it, including females (mothers and non-mothers), juvenile teams or older people if they wish. The presumption that female teams, or mixed gender teams, cannot or would not use the 3G pitch is incorrect. The proposed Artificial Grass Pitch is not limited to use by sports clubs: local schools, community groups etc. are free to book if they wish.

SDCC provide recreation and amenity within our open spaces for all members of the public. However, some facilities do tend to be predominantly used by one age group (e.g. provision of playgrounds, teenspaces or active aged areas), the important principle is to provide a variety of facilities for all age groups and genders and to be as universal / inclusive as possible in provision.

SDCC did, in recent years, propose a playground for this area but the proposal was rejected, but this proposal could be revisited if the local resident's association wish to do so.

A teenspace can also be considered under the current teenspace programme if the local residents association so wish; both of these proposals could further expand the age profile of park users if this is a particular local concern.

As set out above, the rest of the park also remains available for use by all members of the public as previously, and 1. No grass pitch remains in the park for general public / allocated club use.

4. Use of the Park by Ballyboden St. Enda's Club:

At present there are 2 No. existing GAA pitches at Knocklyon Park. Both are currently allocated to Ballyboden St. Enda's Club for the 2023 season by annual allocation. The proposal is to convert one of these pitches to an Artificial Grass Pitch and retain the 2nd pitch as a grass pitch (as existing). The proposals retain the existing full sized grass pitch within the area and this was carefully designed into the design of the proposals. The existing changing facilities and car park will be in close proximity to the proposed pitch, which should be an advantage to the club.

The 2nd grass pitch remains available to be allocated to clubs under the terms of an annual allocation. Only 1 No. GAA sized pitch is being converted to a 3G Pitch. The proposed conversion of a grass pitch to a 3G Pitch provides for increased match play. In addition, the proposed provision of an Artificial Grass Pitch allows for training use by clubs; which is not permitted at present on SDCC grass pitches. The proposed pitch can be used for juvenile play if so wished.

The proposed Artificial Grass Pitch will be available for use by all clubs, including Ballyboden St. Enda's Club, and it will also facilitate use by a variety of other clubs, including GAA, soccer and rugby.

5. Need for the 3G pitch:

SDCC's Sports Pitch Strategy sets out the requirement for pitches, including Artificial Grass pitches in the county. It is acknowledged there will be the loss of one existing GAA sized pitch with the proposal. The proposal however includes for its replacement with a full GAA-sized Artificial Grass Pitch that will support increased use and multi-functional use (GAA, soccer and rugby) by a variety of clubs, schools and other groups. Grass pitches support a limited amount of play time, and with current climate change forecasts of drier summers and wetter winters, it is envisaged that grass pitches will be increasingly out of match-use for long periods. In addition; SDCC does not permit training on grass pitches (mainly due to the damage incurred), so training need is currently un-met on existing SDCC grass pitches.

A number of Artificial Grass Pitches provided across the county with access for all, is seen to be the most sustainable way to provide such facilities and allow for use within the local areas and prevent long distances of travel for local clubs / groups.

6. Ownership, maintenance and charging / cost:

The Artificial Grass Pitch will remain in the ownership and under the maintenance of SDCC, the requirement to pay modest charges for use of public facilities is not unusual nor unlawful. There is already an annual allocation fee paid by clubs for

use of SDCC's grass pitches. SDCC have committed to an affordable regime of charging that contributes to the cost of maintenance and replacement of the surface carpet in 10-15 years. Informal consultation with clubs to date shows welcome for this proposal, these clubs have informed SDCC that they are expending a large amount of money annually on sometimes substandard Artificial Grass Pitches. The proposed charging regime for SDCC's Artificial Grass Pitches proposes a modest fee, it will not deliver a profit, but will contribute to the cost of the facility upkeep and eventual surface replacement costs.

7. The Construction stage will be subject to a traffic and pedestrian management plan that will ensure maintenance of access arrangements or sufficient provision of alternative routes, should they be required.

Chief Executive's Recommendation

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

6.5 Fencing (issue 5)

Summary of Issue

1. Concerns regarding the proposal for a 6.4m high fence will create a personal security risk along the adjacent footpath as it will no longer be in full view.

Visual impact

Chief Executive's Response

1. The proposed weld mesh fence allows for views through the fence to the other side. The increase in use of the Artificial Grass Pitch will contribute to passive surveillance and safety within the park.

There is a significant public investment in the construction of a 3G pitch and protection of the facility with a fence and gates is prudent. SDCC will manage the facility with a dedicated facility booking system.

Chief Executive's Recommendation

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

6.6 Car Parking, Traffic and Emergency Access (issue 6)

Summary of Issue

1. Concerns raised regarding the proposed use of the car park currently leased to Ballyboden St. Enda's Club by SDCC.

2. Concerns regarding additional parking and related concerns regarding potential for illegal parking in adjacent estate

3. Concern raised that illegal parking will prohibit emergency access to residential estate.

4. Concern raised regarding the need for a traffic impact assessment and the safety of children and other pedestrians within adjacent residential streets due to increased traffic. A question was asked regarding who will police cars speeding through the estate.

5. Concern raised regarding the potential for increased traffic on Killinney Road because of the proposal and further concerns were raised with regard to potential traffic impacts on the M50.

6. Concern raised that emergency access to the pitch is not formally provided

Chief Executive's Response

1. Use of the existing car park leased to Ballyboden St. Enda's GAA Club is not proposed as part of this Part 8.

2. No additional car parking is proposed as part of the proposed development. All aspects of the project description as provided by SDCC and as included in the Part 8 application were assessed in the EIA Screening and AA Screening. Given the proposed development will replace an existing playing pitch of similar size, a significant increase in use at any one period of play is not expected and no significant impact on parking demand is expected, as noted in the EIA Screening. An Bord Pleanála Inspector's report notes the following: "There is also sufficient availability of public transport and existing parking serving the site."

SDCC intend providing several Artificial Grass Pitch Facilities across the county (Sean Walsh Park, Airlie Park being recent

examples); so, apart from organised matches, it is not considered that users will travel long distances to use the facility. The Design and Access Statement contained within the Part 8 documents notes that carpooling and public transportation will be promoted during the facility operation and management. To alleviate concerns regarding overlap of teams arriving and departing, SDCC will allow 10-15 minutes between booking times to allow for clearance of one team before another arrives and will work with booking parties to encourage timely exit, sustainable transport choices and compliance with traffic laws. As SDCC is managing the facility, any illegal parking, nuisance or other issues that occur during the booked time can be discussed with the parties responsible and / or notified to An Garda Siochana to ensure responsible use of the facility and respect for the surrounding residential area.

There is an abundance of existing parking surrounding the park; SDCC have a public car park 700m from Knocklyon Park, which can also serve as a park and stride location and provide warm-up for car borne facility users, there is on-street parking/drop off in the area, as well as parking adjacent to many of the local Sports Clubs facilities and Local Schools for their own use, which could serve as park and stride to this facility for those groups if / when they are using the facility. The provision of additional vehicular parking is therefore not considered necessary. Vehicular access is possible via Killinney Road (for drop off) and via Woodstown Estate.

Bicycle parking will be provided at detailed design stage.

3. Illegal parking is a matter for An Garda Siochana / Traffic Wardens and if issues arise they can and will be notified. In addition, to alleviate concerns regarding overlap of teams arriving and departing, SDCC will allow 10-15 minutes between booking times to allow for clearance of one team before another arrives and will work with booking parties to encourage timely exit, sustainable transport choices and compliance with traffic laws. As SDCC is managing the facility, any illegal parking, nuisance or other issues that occur during the booked time can be discussed with the parties responsible and / or notified to An Garda Siochana to ensure responsible use of the facility and respect for the surrounding residential area.

4. A Traffic Impact Assessment was not required Traffic will be required to comply with traffic laws, any deviation from same can and will be notified to An Garda Siochana. SDCC will allow 10-15 minutes between booking times to allow for clearance of one team before another arrives and will work with booking parties to encourage timely exit, sustainable transport choices and compliance with traffic laws. As SDCC is managing the facility, any illegal parking, nuisance or other issues that occur during the booked time can be discussed with the parties responsible and / or notified to An Garda Siochana to ensure responsible use of the facility and respect for the surrounding residential area.

5. The proposal was referred to Transport Infrastructure Ireland for comment, a submission was received from TII and no traffic impact concerns were raised in relation to M50 or the M50 junction. Similarly the proposal was referred to SDCC Roads Traffic Section and no traffic issues were raised.

6. Emergency access to the pitch is not an issue. Emergency services can and do access all SDCC pitches.

Chief Executive's Recommendation

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

6.7 Lighting (issue 7)

Summary of Issue

1. Concerns regarding the proposal for lighting and impact on star gazing, and that light pollution could disrupt the sleep and well-being of the residents

Chief Executive's Response

1. Light spill will be restricted to younger trees to the east and the area of Hawthorn and Bramble scrub to the north which is currently lit by M50 lighting. The wooded area and hill to the east will be further screened with increased planting as per the projects landscape plan. This lighting plan was devised to minimise impact wherever possible while still maintaining useable playing conditions. The lighting design was examined further by Sports Labs Ltd. They state that the design does not exceed the limits for the E3 environment at Knocklyon (Sports Labs Ltd, Knocklyon Park, Construction of a new 3G Synthetic Pitch, Flood Lighting Design, July 2023). As a precautionary principle it is recommend a lighting curfew of 9pm (21:00) will be implemented between 1 April to 31 August, this is to account for bat emergence activity but will be also of

use to star gazers. The landscape plan is developed to provide some planting and screening to the residents from the proposed pitch, which will also be of assistance in reducing the impact of the proposed lights.

Chief Executive's Recommendation

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

6.8 Noise (issue 8)

Summary of Issue

1. Concern raised that the noise generated by use of the Artificial Grass Pitch would impact on residential amenity and health and well-being. In addition, concerns were raised about the sound of balls rebounding off the fence.

Chief Executive's Response

1. It is accepted that noise from the existing sport pitch area may increase slightly at certain times due to the all-weather availability of the pitch. However, this increase is not likely to be significant, as stated in the EIA Screening. For residential receptors the increase will be slight, given the closest residential receptor is approx. 75m away from the proposed pitch and the background noise levels from the adjacent M50 motorway. Noise buffers will be included in the fence detail at detailed design stage to decrease the noise from rebounding balls. Noise is not anticipated to have an impact on ecological receptors during the operation phase. The landscape plan is developed to provide some planting and screening to the local residents from the proposed pitch.

Chief Executive's Recommendation

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

6.9 Location Proposed (issue 9)

Summary of Issue

1. Expressed concerns regarding the suitability of the proposed location, in a residential estate that is a 'cul de sac'
2. Expressed concerns regarding the selection process and opinions were expressed that other locations in the wider area would be more suitable: e.g. Cherryfield Park and to the North of the proposed site at Killinney Road.

Chief Executive's Response

1. The proposed development is effectively an upgrading of an existing sports facility and is significantly below the threshold for urban development. Excluding the associated landscaping and footpaths, the size of the artificial grass pitch will generally mirror the size of the existing grass pitch. The design of the astro-turf pitch and associated landscaping and footpaths would not be significantly at variance with the established pattern of development on lands zoned for open space. In the context of the size of the overall Knocklyon Park, the design of the astro-turf pitches would assimilate into the wider park infrastructure.

The site is zoned for open space and is actively used for recreational amenity and adjacent to a residential area for the purposes in the development plan. The adopted development plan has been subject to AA and SEA and considered the land use and classes of development such as the that proposed would be open to consideration on lands zoned 'Open Space'. The SEA for the plan concluded that its implementation would not result in significant effects on the environment. It is noted that the development is on serviced lands in an urban area and does not constitute a significant urban development in the context of the wider city. The development is not associated with any significant loss of habitat or pollution which could act in a cumulative manner to result in significant negative effects to any Natura 2000 sites. There are no projects which can act in combination with the development which can give rise to significant effect to Natura areas within the zone of influence.

The proposed development is effectively an upgrading of an existing sports facility. The proposed development is compatible with the existing use of the land for amenity/recreational purposes and the site is zoned 'Open Space (OS)'. The Use Classes related to the zoning objective which are permitted in principle include recreational facility, sports club / facility. The submissions applicants to An Bord Pleanála that this may be a material change of use is noted, but the development plan is open to considering this type of development in its zoning objectives. It is also considered that the proposed

development in the context of its zoning objective would not significantly impact adjoining zoning objectives such as 'Existing Residential (RES)' to the south of the site. Both recreational facilities and sports clubs / facilities are open to consideration in this zoning objective in 'Existing Residential (RES)' also.

2. The Feasibility Stage assessment, which informed the proposed location, was based on an assessment of the weighted relevant criteria of three different sites; there is no issue with that process and the site chosen is the most suitable within the area. The preliminary design of the Artificial Grass Pitch at Knocklyon Park site then included consideration of the site in further detail to include site surveys, investigations and other reports. There is no obvious insurmountable issue with the proposed site. The part 8 process examines the proposal in relation to the site proposed, it is outside the scope of the Part 8 procedure to examine alternative sites.

Chief Executive's Recommendation

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

6.10 Proximity to Houses (issue 10)

Summary of Issue

1. Concerns that the proposed pitch is too close to residential houses, (concerns regarding flood-lights, noise and other issues are also addressed elsewhere)
2. Potential for reduced property values

Chief Executive's Response

1. The distance to the nearest house is measured at 73m approximately. This is further than the distance to existing Artificial Grass Pitches in use within the area and existing Artificial Grass Pitches recently built in the county elsewhere. The preliminary design stage included moving the proposed location away from the residential houses, further into the park to allow for this increased distance.

2. Property values fluctuate regularly, the provision of recreational amenity within public park is unlikely to be a significant factor in this regard. The area proposed for the facility is zoned for open space and recreational amenity and such use is to be expected therein.

Chief Executive's Recommendation

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

6.11 Microplastics and Potential Material Ban (issue 11)

Summary of Issue

- 1 Concern regarding the potential for use of rubber / plastic infill material and risk of toxins and heavy metals. Potential for the contamination of the area with microplastics.
2. Concerns raised that the likelihood of a ban on rubber infill material on Artificial Sports Pitches.

Chief Executive's Response

1. The proposed pitch will provide a facility primarily for GAA and Soccer use, while also ensuring Rugby and other such sports can be facilitated. To be used for competitive GAA and Soccer matches as well as Rugby, the new pitch shall comply with the following Governing Bodies: - FIFA Quality Handbook of Requirements (2015) - World Rugby Regulation 22 (2016) - GAA Synthetic Turf Surfaces for Gaelic Games (2022).

In light of the restrictions likely to be placed on the use of polymeric infills the Artificial Grass Pitch is proposed to proceed with a natural alternative infill option. The European Synthetic Turf Council Infill interest group is currently developing guidance on all types of infill materials, with a specific focus on non-polymeric infills that fall outside the scope of the planned new EU restriction.

Certification has been achieved on the alternative options but more focus to date has been placed on FIFA Quality (Soccer standard) and World Rugby (rugby requirements) performance requirements. Less innovation on alternative infills has been

carried out on GAA systems, however there are performance similarities to both the FIFA Quality and World Rugby systems. Sports Labs Ltd. have been engaged by SDCC and are committed to the project at Knocklyon Park and with their industry expertise will support the alternative infill product through laboratory testing and certification to GAA standards, removing the risk associated to any new product being introduced into the market. A natural sustainable infill material will be used in place of plastic / rubber infill in the proposed pitch.

2. Considering the restrictions likely to be placed on the use of polymeric infills in future, the Artificial Grass Pitch is proposed to proceed with a natural alternative infill option. The European Synthetic Turf Council Infill interest group is currently developing guidance on all types of infill materials, with a specific focus on non-polymeric infills that fall outside the scope of the planned new EU restriction.

Certification has been achieved on the alternative options but more focus to date has been placed on FIFA Quality (Soccer standard) and World Rugby (rugby requirements) performance requirements. Less innovation on alternative infills has been carried out on GAA systems, however there are performance similarities to both the FIFA Quality and World Rugby systems. Sports Labs Ltd. have been engaged by SDCC and are committed to the project at Knocklyon Park and with their industry expertise will support the alternative infill product through laboratory testing and certification to GAA standards, removing the risk associated to any new product being introduced into the market. A natural sustainable infill material will be used in place of plastic / rubber infill in the proposed pitch.

Chief Executive's Recommendation

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

6.12 Health and Well-being and Injury resulting from the Artificial Grass Pitch (issue 12)

Summary of Issue

1. Concern that the provision of the Artificial Grass Pitch will have a detrimental effect on the health and well-being of park users who use it for recreation, enjoyment and amenity. Different factors were mentioned as causing such an impact: loss of access to a section of the park, increase in use of the pitch, increase in noise, provision of flood lights etc.
2. Potential to crash into the new fence if / when sliding down adjacent hill.
3. Artificial Grass Pitches are more likely to cause injuries to players and players may run into fences.

Chief Executive's Response

1. Access to the park is not precluded. Access to the proposed facility will be limited by a booking system operated by SDCC, but the remaining park remains as existing with additional planting and provision of additional footpaths to create a new looped section of walkway. Access to the footpaths and the open space is not restricted.

The EIA Screening Report and the An Bord Pleanála decision regarding same makes consideration of risk to Human Health arising from the proposed development. An Bord Pleanála's Inspector considered this issue also as follows (ref Section 8.3.1.6 of the An Bord Pleanála Inspectors report -linked above):

Construction Phase Risks: routine construction related pollution and nuisance generated including noise, light, dust and traffic related impacts with the potential to cause nuisance and impact on the amenities of adjoining dwellings and the parkland amenities.

Operational Phase risks: some pollution and nuisance associated with the use of the astro-turf pitches owing mainly to noise, light, traffic and the potential spread of microplastics from the astro-turf. The operational phase may see increased numbers of people using the site. also.

The An Bord Pleanála Inspector concluded that:

"There is no significant risk to human health. During the construction and operation phases risk to human health arising from pollution and nuisances listed in Section 8.3.1.6 would be controlled as part of the standard and best practice construction and operation measures."

SDCC intend to use a natural sustainable infill material instead of the typical rubber crumb in the 3G surface.

2. Sliding down the hill is a hazardous activity in any case, such activity needs to take into account a number of risks and the position of the Artificial Grass Pitch and the proposed fencing should be one such factor.

3. The Artificial Grass Pitch will be designed to the correct standards and ensure the provision of sufficient run-offs, proper surfacing etc. SDCC will be responsible for maintenance and upkeep of the pitch to ensure the surface remains play-worthy.

Chief Executive's Recommendation

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

6.13 Antisocial Behaviour (issue 13)

Summary of Issue

1. Concern is raised that the pitch will increase anti-social behaviour especially in the secluded areas between the proposed pitch and the M50. Submission Cite existing drug use and dealing in the park at this location and there are concerns it will get worse.

2. Increase in littering and dumping

3. Increased strangers in the area will pose a danger to children and others

Chief Executive's Response

1. The facility is proposed in a public park, which currently has no restriction to access by any member of the public. The safety and security of SDCC's public parks is assured by a number of factors including; national legislation, parks bye laws, good design, visibility, use of parks by members of the general public, passive surveillance, presence of staff, assistance of An Garda Siochana. The proposal include for fencing that is visually permeable, allowing views through to the footpath on the other side. The increased use of the facility by local clubs, schools and others will be positive for the park in this regard as it will increase the opportunities for passive surveillance. Several submissions mentioned the current 'hanging about' and alleged drug use along the section of the footpath between the M50 and the proposed pitch. This footpath will now be adjacent to an actively used Artificial Grass Pitch and the area will be well lit and overlooked by the teams using the pitch, possibly dispersing this anti-social use from this area.

2. Litter generated by day-to-day use of the pitch will be controlled by provision of bin(s), as required, at the operational stage and normal maintenance procedures implemented by SDCC. SDCC will manage the booking of the facility and will be able to respond quickly to any group using the facility that litters the facility or the surrounding area. With regard to dumping, it is unclear how this is linked to the provision of an Artificial Grass Pitch but SDCC's Waste Management Policies will be implemented within the area as standard.

3. The facility is proposed in a public park, which currently has no restriction on access by any member of the public. The safety and security of SDCC's public parks is assured by a number of factors including; national legislation, parks bye laws, good design, visibility, use of parks by members of the general public, passive surveillance, presence of staff, assistance of An Garda Siochana. The deesign of the facility places it in a open area of the park, fully visible from all sides. The proposal includes fencing that is visually permeable, allowing views through to the footpath on the other side. The increased use of the facility by local clubs, schools and others will be positive for the park in this regard as it will increase the opportunities for passive surveillance. Several submissions mentioned the current 'hanging about' and alleged drug use along the section of the footpath between the M50 and the proposed pitch. This footpath will now be adjacent to an actively used Artificial Grass Pitch and this area will be visible and overlooked by the teams using the pitch, possibly dispersing anti-social use from this area.

Chief Executive's Recommendation

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

6.14 Ball Stop Netting (issue 14)

Summary of Issue

1. Concern raised that bats will get entangled in the proposed Ball Stop Net

2. Concern raised that the proposed ball stop net is detrimental to the protected view

Chief Executive's Response

1. It is noted there is an existing Ball Stop Net on site.

See also response under **6.3 Environmental Impact including Climate Change (issue 3)**; Impact on Protected Species- Bats and provision of Ball Stop Netting.

2. The view is of the Dublin Mountains in the background with the setting of the parkland and trees in the middle and foreground. The view is set in a wider context of an urban environment where there is residential development, electricity transmission lines and sports pitch infrastructure; including an existing ball stop net. The proposed fencing and lighting poles around the astro-pitch is the key element which would affect the landscape. However, its design is such that it would sit in front of an existing treeline when viewed from the 'Significant and Protected View' and it is considered that the proposed development, with its landscape plan would have the capacity to absorb the proposed development in the context of the wider landscape's significance at this location in a suburban area.

Chief Executive's Recommendation

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

6.15 Protected view (issue 15)

Summary of Issue

1. Concern raised regarding the potential impact on a Protected View within the County Development Plan

Chief Executive's Response

1. The SDCC County Development Plan maps indicate a Protected View at Knocklyon Park. The direction of the view as indicated by the map symbol is to the southwest. The EIA Screening Report maintains that the view southwest towards the mountains will not be impacted significantly by the proposed development.

The view is of the Dublin Mountains in the background with the setting of the parkland and trees in the middle and foreground. The view is set in a wider context of an urban environment where there is residential development, electricity transmission lines and sports pitch infrastructure. The fencing and lighting poles around the astro-pitch is the key element which would affect the landscape. However, its design is such that it would sit in front of an existing treeline when viewed from the 'Significant and Protected View'

When considering the additional tree planting being proposed and the size and design of facility which utilises existing trees as well as the existing interventions seen from the view (including residential development and transmission infrastructure). It is considered that the facility will assimilate into the urban landscape of the park would not be visually obtrusive and would not, interfere with the character of the landscape and unduly obstruct a view or form an obtrusive or incongruous feature.

Chief Executive's Recommendation

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

6.16 Ancillary Facilities (issue 16)

Summary of Issue

1. Concern raised that no changing rooms or toilet facilities are provided

2. Complains raised regarding the increased amount of residential development and densities in the area without commensurate facilities being provided.

3. Raises the need for the provision of storage areas

4. Requests for the provision of Bike parking

5. Queries regarding the proposed Pitch Booking system and costs

Chief Executive's Response

1. Artificial Grass pitches are typically booked hours to hours, which is not a long time to require ancillary facilities.

Increasingly and especially since Covid SDCC are finding that people come prepared for play to our sports facilities. SDCC

will make people aware that there are no changing facilities available in the area so they can come with their kit on or under their clothes as required.

2. The provision of Artificial Grass Pitches is in response to increasing population and intensification of demand for use of our parks, in this case it responds to the growth in number of clubs, teams, school populations and the general increase in demand for active recreation.

3. Storage areas are provided for in the plans (see general arrangement drawing)

4. Bike parking will be detailed at the detailed design stage.

5. The Pitch Booking System is available for view on www.sdcc.ie

Chief Executive's Recommendation

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

6.17 Perceived Discrepancy in documentation / Procedural Concerns / Unsupported Allegations (issue 17)

Summary of Issue

1. The Sports Pitch Strategy cited in the documents focused on organised sports and did not consider non-organised sports and recreational activity
2. Proposal to provide an Artificial Grass Pitch is contrary to policies in the National Planning Framework; Project 2040
3. The open space was gifted to people of Woodstown by developers 20 years ago, for use by all in the area.
4. Part 8 procedure is undemocratic and not legitimate
5. Ballyboden St. Enda's Club house address was used as applicant address in Part 8 documents
6. Alleges no site layout drawing
7. Information provided for the part 8 process is inaccurate and incomplete.
8. Decision not to do a full EIAR and AA was flawed.
9. Has an opinion that the process for choosing the preferred location at the feasibility stage was flawed
10. Accuses SDCC officials and / or councillors of impropriety, corruption and receipt of bribes without any evidence provided.
11. Alleges undisclosed future plans for the park.
12. Involvement by younger people in the consultation
13. Raised concerns about a lack of construction stage plans.
14. Alleges no consultation with stakeholders and no meetings with local people.

Chief Executive's Response

1. Given the increasing demand and un-met need for grass pitches in the county; SDCC undertook a Sports Pitch Strategy to particularly examine SDCC's provision and required provision in future years of sports pitches for organised sports. The provision of such pitches is an important part of SDCC's public service provision in an urban / sub urban county and the required provision of pitches needed to be planned into the future. The Sports Pitch Strategy was not tasked with considering other sports or recreation; but SDCC has other strategies and policies that cover non organised sports and recreational activity (See list below).

2. Project 2040 supports compact growth and improving amenity and recreational facilities within residential areas. The proposal is not contrary to the National Planning Framework.

3. Woodstown Park is a public park in the charge of South Dublin County Council. It is a public amenity available to all. At present the existing GAA pitches within the park are allocated to a club for use via an annual allocation fee. The proposed Artificial Grass Pitch will be bookable for a modest fee via SDCC's pitch booking system. Use will not be restricted to one club or group.

4. The Part 8 Procedure is set out under legislation and is the appropriate and legal provision for local authorities to

propose their own developments.

5. The public notice, site notice and site location map show the correct location of the site and name the applicant; which are the relevant documents in this regard. An error of named applicant in the Access and Design Document is a minor error and does not impact on the legitimacy of the process.

6. All drawings and documents on public display are provided in accordance with part 8 requirements.

7. No Information is given on the allegation that the part 8 information is inaccurate and incomplete. This allegation is not credible.

8. The EIA and AA screening were done in accordance with legislation. The Determination made by SDCC that a full EIAR and NIS were not required was appealed by 3rd parties to An Bord Pleanála and was upheld as a correct decision. The process is outlined in detail earlier in the report.

9. The Feasibility Stage assessment, which informed the proposed location, was based on an assessment of the weighted relevant criteria of three different sites; there is no issue with the process. The preliminary design of the Knocklyon Park site then examined the site in further detail to include site surveys, investigations and other reports. There is no obvious insurmountable issue with the proposed site.

10. This accusation is scurrilous and intended to offend. The accusation is unsupported and there is no evidence of corruption or bribery of South Dublin County Council officials or councillors provided. Neither is there any information provided for any potential motive for such bribery and it is difficult to understand who could possibly be motivated to gain from the provision of a public facility, that will be owned and managed by a local authority, in a public park. The only people who stand to benefit from such provision are the general public. This allegation is ludicrous and fully rejected.

11. This allegation is also incorrect; at present SDCC have no further plans for the park that require a Part 8 procedure at this time. There were relatively recent proposals for a playspace in the area, which were rejected and did not proceed.

12. It is possible for submissions to be made on children's behalf if wished. SDCC do not make assumptions about the age of people who make submissions during public consultation procedures.

13. The part 8 legislation does not require provision of construction stage plans, in any case construction stage plans are developed at the detailed design and construction stages, so would not be available at this stage. At the appropriate stage all such plans will be developed in accordance legislative requirements and with standard and best practice construction practices.

14. This allegation is also incorrect; several informal, pre-part 8 consultation meetings were held with elected representatives and representatives from Ballyboden St. Enda's GAA Club and the local residents' association at the pre-part 8 stage. In addition, a public meeting followed by a site walk was held at Knocklyon Park, this was attended by a large number of people living in the local area and was attended by a local authority official.

Chief Executive's Recommendation

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

6.18 Capital Cost of the facility and value for money. Concerns regarding pitch size. (issue 18)

Summary of Issue

1. Cites that the budget would be better spent on other facilities e.g. dog park.
2. Opines that the proposal is a waste of money
3. Cites concerns that the proposed Artificial Grass Pitch is too big

Chief Executive's Response

1. This issue is irrelevant to the consideration of the proposal under the proper planning and sustainable development of the

area.

2. This issue is irrelevant to the consideration of the proposal under the proper planning and sustainable development of the area.

3. SDCC's Sports Pitch Strategy requires the council to provide facilities that are as flexible in use and designation as possible. The provision of a GAA sized Artificial Grass Pitch allows for use by GAA, Soccer and Rugby teams and facilitates match play as well as training use, all of which are important in relation to meeting demand for such use in the county. The environmental reporting shows that the proposal does not impact negatively on the existing environment and Knocklyon Park is of a size that allows the proposal to integrate well into the landscape. The landscape proposals further help to 'soften' the proposal and integrate it into the landscape.

Chief Executive's Recommendation

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

7.0 Assessment as to whether or not the proposed development would be consistent with the proper planning and sustainable development of the area.

County Development Plan 2022-2028:

The lands are zoned – South Dublin County Council Development Plan Zoning Objective 'OS': *'To preserve and provide for open space and recreational amenities'*



Fig 4: Extract from SDCC County Development Plan 2022-2028 Zoning map.

Table 12.15: Zoning Objective 'OS': 'To preserve and provide for open space and recreational amenities'

Use Classes Related to Zoning Objective	
Permitted in Principle	Allotments, Community Centre, Cultural Use, Open Space, Recreational Facility, Sports Club / Facility.
Open for Consideration	Agriculture, Bed & Breakfast ^a , Camp Site, Car Park ^h , Cemetery ^e , Childcare Facilities, Crematorium, Education, Garden Centre, Guest House ^a , Home Based Economic Activities ^a , Hotel / Hostel, Housing for Older People*, Outdoor Entertainment Park, Place of Worship ^a , Public Services, Recycling Facility, Residential*, Restaurant / Café, Shop-Local, Stadium, Traveller Accommodation.

Not Permitted	Abattoir, Advertisements and Advertising Structures, Aerodrome / Airfield, Betting Office, Boarding Kennels, Caravan Park-Residential, Concrete / Asphalt Plant in or adjacent to a Quarry, Conference Centre, Data Centre, Doctor / Dentist, Embassy, Enterprise Centre, Fuel Depot, Funeral Home, Health Centre, Heavy Vehicle Park, Hospital, Industry-Extractive, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq m, Offices 100 sq m-1,000 sq m, Offices over 1,000 sq m, Off-Licence, Petrol Station, Primary Health Care Centre, Public House, Refuse Landfill / Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Rural Industry-Food, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop Neighbourhood, Social Club, Transport Depot, Veterinary Surgery, Warehousing, Wholesale Outlet, Wind Farm, Work-Live Units.
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^a In existing premises

^h For small-scale amenity or recreational purposes only

^e If provided in the form of a lawn cemetery

* Only where this accords with H3 Objective 4

Fig 5: Showing use Class Tables from County Development Plan

The county development plan policies that affect the site directly are the following:

Policy COS4: Sports Facilities and Centres

Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable.

COS4 Objective 1:

To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County, in consultation with relevant stakeholders, to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.

COS4 Objective 8:

To support the provision of permanent space for well-established sports and recreational activities at appropriate locations within the County, aspiring to the standards and conditions met for such playing areas by National Governing Bodies, where feasible and in accordance with proper planning and sustainable development

COS4 Objective 11:

To facilitate as far as possible all sports played by the citizens of South Dublin County including rugby, recognising the growing numbers taking part in the sport and the particular requirements of the game in terms of pitches.

COS4 Objective 19:

To ensure where possible and appropriate, that all public all-weather pitches provided by South Dublin County Council cater for all team sports and are large enough to cater for a full size GAA pitch.

COS5 Objective 3: To support the implementation and expansion of the Council's TeenSpace Programme (2021) and the implementation of the Sports Pitch Strategy (2020) or any superseding documents.

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 and include safe bicycle parking spaces at appropriate locations.

National Sports Policy 2018-2027

This national policy highlights the influence and importance of sport across Irish society, it provides a vision for Irish Sport in 2027 and defines the key actions required to achieve its ambitious goals:

“Lead Role for Local Authorities

Local Authorities are key stakeholders in the context of the public spaces which are widely used for sport and physical activity. They manage the public parks; they are responsible for the local road network; and they are key facilitators for outdoor recreation with almost 1 in 5 recreational walkers walking in public parks and 1 in 3 adult sports participants taking part in public spaces. Public spaces are often used on an informal basis by meet-and-train groups while sports clubs are also widespread users of these spaces.”

ACTION 8 We will establish, through Sport Ireland, an initiative to support Local Authorities in developing Local Sports Plans consistent with the overall vision and objectives of this National Sports Policy. The Local Plan will review needs and set out actions to increase participation locally. It will be developed and implemented in cooperation with LSPs, clubs, communities and partners within and beyond sport.

ACTION 22 We will work with relevant stakeholders to explore the merits of a new programme of current sports funding under a targeted scheme to support schools on a sustainable basis in defraying reasonable costs (such as necessary transport and facility hire) incurred in delivering the aquatics strand of the PE curriculum. We will encourage Local Authorities to promote and facilitate more sharing of facilities locally, especially where capacity is available at off-peak times during the day, in the evening or during holiday periods in the case of educational establishments. This will involve working closely with clubs and sporting bodies, schools and colleges, leisure facility providers and others. As part of the Local Sport Plans, Local Authorities will also lead on other collaborative initiatives to improve access locally e.g. Local Authorities and LSPs will combine to see how recreational areas can be utilised more fully by local communities for sport and physical activity e.g. for parkruns.

“Local Authorities have a significant role in promoting participation in sport and physical activity in the community. They invest significant resources in physical infrastructure for sport and physical activity and employ sport and recreation development officers. They are strongly engaged in community development through the LCDCs and the associated Local Economic and Community Plans, which seek to enhance the quality of life and wellbeing of communities linking strongly with the policy agenda around sport and physical activity. They have a close working relationship with LSPs and NGBs, sports clubs, facility providers, schools, community groups and other stakeholders locally. As already noted, we see potential for an expanded role for Local Authorities in leading collaboration within and beyond sport in their local area.”

Active South Dublin Plan 2023 (SDCC's Local Sports Plan):

On the 08/05/2023 SDCC formally ratified the aims and actions of the inaugural Local Sport & Physical Activity Plan for the county for the period 2023-2028.

Titled “Active South Dublin” the plan stems from Action 8 of the National Sports Policy 2018-2017 which seeks all local authorities to develop local sports plans.

South Dublin County Council is the first local authority nationwide to achieve this aim. The plan includes many ambitious objectives and actions in areas such as participation opportunities, facility development, club support and leader training, to support and motivate every citizen in the county, regardless of age, background or ability, to lead active healthy lives.

Relevant sections include:

Ambition 4:

Optimise the potential of existing natural and physical assets such as community centres, parks, mountains, water, leisure centres and schools as places where sport, physical activity and recreation can occur.

Ambition 6:

Significantly enhance the availability of quality sport, recreation and physical activity facilities and spaces through the full delivery of our sports capital programme and other capital programmes.

- Work collaboratively to deliver the planned projects included in the current Three-Year Capital Programme 2023-2025 and beyond, and seek to expand the range of sport, physical activity and recreation projects in the Council’s capital programmes based on assessed need and demand.
- Ensure that the Active South Dublin work programmes are aligned to and support the ongoing implementation of the Council’s strategic plans for pitches, parks and open space, green infrastructure, cycling and other relevant strategies.

South Dublin County Council Sports Pitch Strategy 2020:

This Strategy was presented to South Dublin County Council in January 2020. It outlines the following:

ARTIFICIAL GRASS PITCHES (AGPS):

AGP’s can provide a vital asset to the local community in terms of training facility to local clubs and teams. The benefits of AGP pitches are outlined below:

- Providing all weather, year-round facilities
- Providing pitch capacity to meet increased population growth in higher density/ urban locations
- Meeting demand for increased match play
- Meeting demand for training provision which is not currently being met.
- Removing training pressure from grass pitches with resultant higher standard of grass pitch

AGP’s have the ability to support far more matches and training sessions compared to regular grass pitches and can be strategically located in new development areas or high population areas

AGP’s should be viewed as a community asset as they can support many segments of the population and offer a multi-sport approach through different sports. Each AGP has a travel time of 20 minutes where the optimum number of the population will travel to use the site. When new developments are being built AGP’s should be associated with these areas as typically this is where the younger population will increase.

New AGP provision needs to be aligned to areas of need; in terms of both match and training demand. In addition, areas need to be carefully assessed to ensure the location is suitable for high traffic, peak use, use of flood lighting etc. 3-5 locations are recommended across the county; to cover Sub areas 6 and 7, Areas 2 and 4, Area 5 and Areas 1 and 3.

It is important to consider AGP locations in new development areas where open space provision is not large and provision of AGPs can cater for intensive active recreational use; provision of AGPs in these new development lands can also cater for existing need in existing residential areas.

Map 4.1 below shows proposed potential sites within the local authority. These sites cover the vast majority of the local authority and also expand to other local authority areas who might to look to use these pitches, detailed feasibility studies should be created to further explore these sites.

Map 4.1: Sites for potential new AGP's

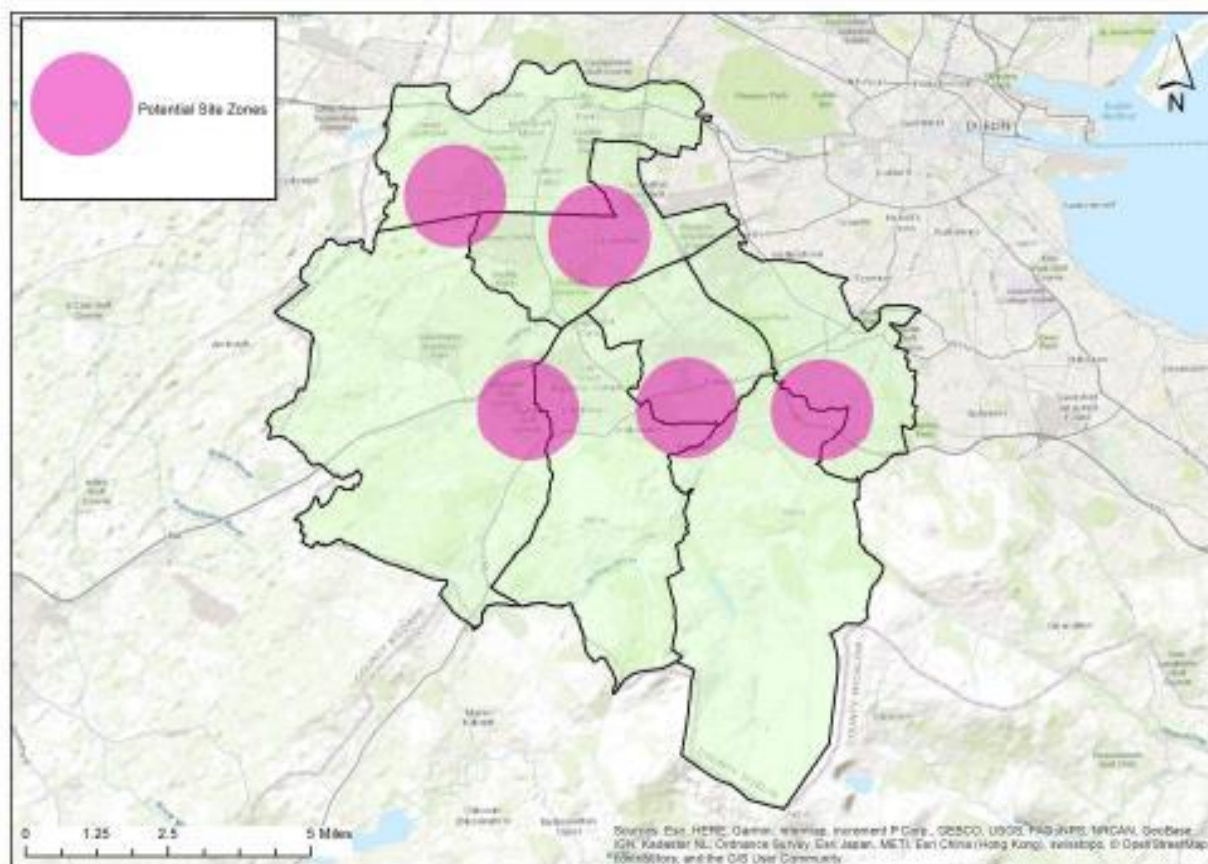


Fig 6: Showing sites for potential new AGPs from Sports Pitch Strategy 2020.

SDCC's Capital Budget 2023-2025

Includes funding towards 'East of the County Astro'

Assessment:

The proposed development is 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 other plans and policies set out above and considering the following further outlined in the report. The proposed development is effectively an upgrading of an existing sports facility and is significantly below the threshold for urban development. Excluding the associated landscaping and footpaths, the size of the astro-turf pitch will generally mirror the size of the existing grass pitch. The design of the astro-turf pitch and associated landscaping and footpaths would not be significantly at variance with the established pattern of development on lands zoned for open space. In the context of the size of the overall Knocklyon Park, the design of the astro-turf pitches would assimilate into the wider park infrastructure.

The site is zoned for open space and is actively used for recreational amenity and adjacent to a residential area for the purposes in the development plan. The adopted development plan has been subject to AA and SEA and considered the land use and classes of development such as the that proposed would be open to consideration on lands zoned 'Open Space'. The SEA for the plan concluded that its implementation would not result in significant effects on the environment.

It is also noted that the development is on serviced lands in an urban area and does not constitute a significant urban development in the context of the wider city and the other projects identified above.

The development is not associated with any significant loss of habitat or pollution which could act in a cumulative manner to result in significant negative effects to any Natura 2000 sites. There are no projects which can act in combination with the development which can give rise to significant effect to Natura areas within the zone of influence.

8.0 Manager's Recommendation:

With regard to the Proposed Synthetic Grass Sports Pitch at Knocklyon Park, Ballycullen, Dublin 16 and following consideration of the received submissions, it is apparent that a significant number of submissions oppose the proposal.

The proposal aligns with County Development Plan policy and other policies in relation to the provision of active recreational amenity and is in accordance with the proper planning and sustainable development of the area. The Chief Executive recommends proceeding with the development as proposed.

In accordance with Section 179 (4) (b) of Planning and Development Act 2001 (as amended by reg.27 of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No 296 of 2018), the members of a local authority shall consider the Chief Executive's Report and the members decide that the proposed development may be carried out as recommended in the chief executive 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.