COMHAIRLE CONTAE ÁTHA CLIATH THEAS SOUTH DUBLIN COUNTY COUNCIL



South Dublin County Council Meeting

10th March 2025

Chief Executive Report on the Part 8 - Upgrade works for the entrance and route into Lucan Demesne Park, in the townland of Lucan, Co. Dublin.

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 Lucan:

The proposals are:

- The construction of a timber boardwalk from the plaza to the existing river side path of approximately 105m in length, ranging from approximately 150mm to 900mm in elevation, and generally 2m in width, widening in places up to 3m.
- The removal of the existing path, this area will be allowed to revert to its original state.
- All related hard and soft landscape works including associated planting.
- All ancillary works.

The proposal has undergone Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) an Environmental Impact Assessment Screening (EIA) and an Ecological Impact Assessment (EcIA) under the EIA Directive 2014/52/EU. The Planning Authority has made a preliminary examination of the nature, size and location of the proposed development. The authority has concluded that there is no real likelihood of significant effects on the environment arising from the proposed development and a determination has been made that an EIA is not required.

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
- List of submissions received during the consultation period.
- A summary of the issues raised in the submissions made during the consultation period and the Chief Executive's responses and recommendations.
- Assessment as to whether or not the proposed development would be consistent with the proper planning and sustainable development of the area.

• Recommendation as to whether or not the proposed development should be proceeded with as proposed, or as varied or modified as recommended in the report, or should not be proceeded with, as the case may be.

1.3 Outline of the Public Consultation Pro

1.3.1 Non - Statutory Consultation

The plans and particulars for the Part 8 were presented prior to commencement of the statutory Part 8 process at a meeting of the Lucan/Palmerstown/Clondalkin Area Committee Members on the 17th December 2024.

1.3.2 Statutory Consultation

The proposed development and accompanying Appropriate Assessment, Environmental Impact Assessment and report were placed on public display for the statutory period from Friday 17th January 2025 to Thursday the 28th February 2025.

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 17th January 2025 to 28th February 2025. 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 17th January 2025 to 14th February 2025.

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 Friday the 28th of February 2025 and could be submitted either:

via Online Submissions: http://consult.sdublincoco.ie

or By post to:

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.

A total of 2 submissions/observations were received by the end of the public consultation period.

2. Proposed Development

2.1 Description of the Proposed Development

The proposals are for the upgrade works for the entrance and route into Lucan Demesne Park, including the following:

- The construction of a timber boardwalk from the plaza to the existing river side path of approximately 105m in length, ranging from approximately 150mm to 900mm in elevation, and generally 2m in width, widening in places up to 3m.
- The removal of the existing path, this area will be allowed to revert to its original state.
- All related hard and soft landscape works including associated planting.
- All ancillary works.

2.2 Plans and Details

Plans and details are available at the following link:

<u>Lucan Demesne Park Entrance | South Dublin County Council's Online Consultation Portal</u>

Fig 1. Map of the relevant area

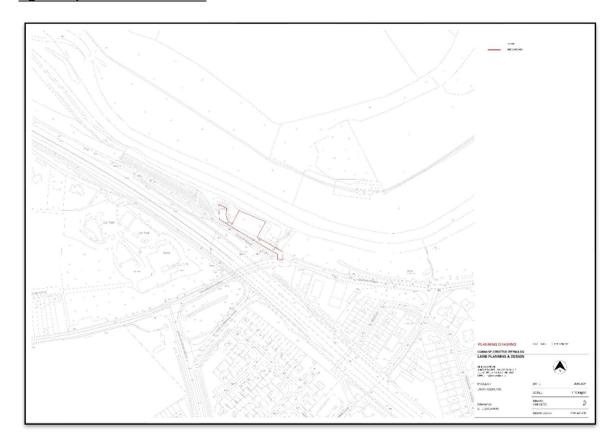


Fig 2: Site plan

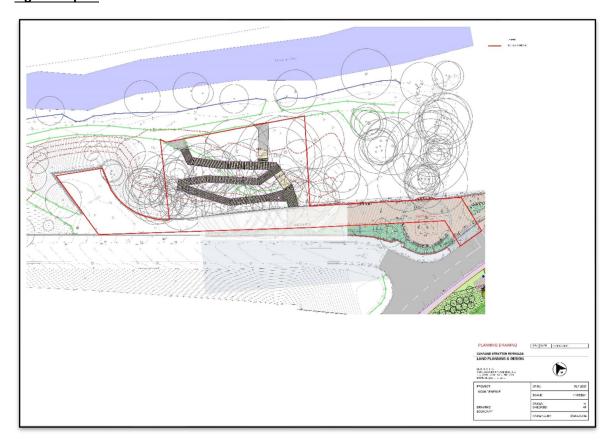
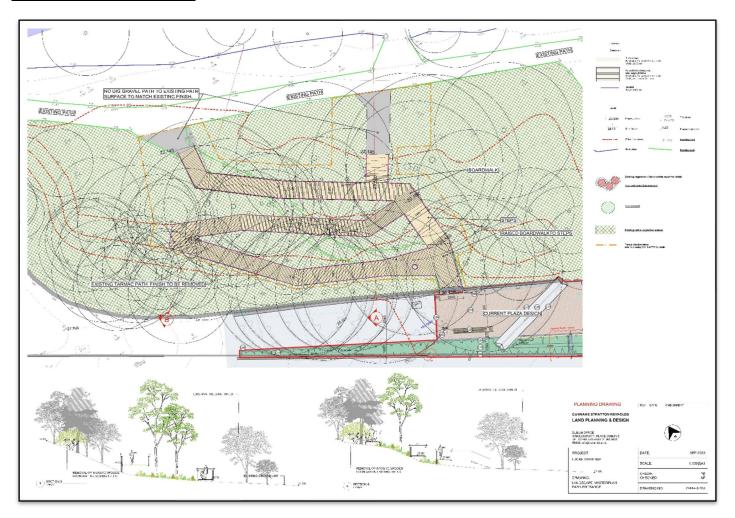


Fig 3 Plan of the development



3. Public Consultation Process

3.1 List of Submissions

2 No. submissions/observations below were received during the specified period of the public consultation in respect of the proposed development.

Submissions/Observations:

1. Inland Fisheries Ireland Matthew Carroll

"I had a quick review of the proposal and all looks fine.

The Liffey is the main receptor that may be impacted, especially during the construction phase by of silt laden runoff form the works, if appropriate controls and mitigation measures are not implemented.

It would be desirable from a fisheries perspective that the existing vegetation at the end of the run-off areas from the walkway and along the bank of the river be maintained both during and after the construction phase.

I am not familiar with the area, and I am not sure if there is an existing pathway at the bottom of the walkways or if this has yet to be constructed.

If a pathway is to be constructed along the river, then IFI requests that the design does not provide for a linear walk near the river be considered as aquatic species need to feed and rest. Continued disturbance caused by the public and their animals is not conducive to a healthy environment.

The pathway design should leave the river at appropriate intervals and distances to provide undisturbed areas for fish to feed and rest.

The Preliminary Construction Erosion and Sediment Control Plan Report provides outline guidance and practices

for the implementation of erosion and sediment control practices during the construction phase of this project. Once detailed design commences, a detailed construction and sediment and erosion control plan shall be prepared which, upon carrying out a site-specific risk assessment with regard to erosion and sediment control based on construction methods and other mitigation methods identifies and locates:

Principal Avoidance Measures

Principal Control Measures

Site Specific Requirements

Construction methods"

CE review and Response:

SDCC can confirm that the existing vegetation at the end of the run-off areas from the walkway and along the bank of the river will be maintained both during and after the construction phase. The existing pathway at the bottom of the ramp has been in situ for many years and it is not intended to re-construct this as part of the proposals. A sediment control plan has been prepared.

2. Lucan Kayak Club, Dr. Sarah McCarthy, via consultation portal

Summary: existing route is well used by the club to access their existing storage area, and necessitates carrying a wide variety of kayaks and boats up and down the route. They express concerns regarding the provision of access required for the varying boat sizes. In particular they have concerns about the potential slipperiness of the surface unless it is cleaned and power washed regularly and the need to provide sufficient space for negotiating turns along the route, sufficient space to allow for passing points, they recommend the following: that the angles of the path are generous enough to allow for a 17ft kayak to be moved along it whether it is either being carried by two people or on wheels and that more passing places built into the route. They also requested consideration of the height of the side barriers when kayaks are being transported up and down from the container/the river. They also recommend incorporating a 'slide' alongside the more direct, stepped, path, to facilitate kayaks being slid along the side up and down from/to the container/river.

CE review and Response:

Submission is noted and the club will be further consulted at the detailed design stage to ensure access is enabled for recreational users. The detailed design of the facility will incorporate sufficient space for use by recreational users and others. The slide will be incorporated at the detailed design stage. The maintenance of the facility has been provided for.

4.0 Planning Considerations

This area is zoned in principle as Open Space. Objective HA-LV - To protect and enhance the outstanding character and amenity of the Liffey Valley.

South Dublin County Development Plan (2022-2028)

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

Chapter 8.7 'Parks and Public Open Space' deals with the function, hierarchy, quality and quantity of parks and public open space in the County. As set out in the Plan, the overarching aim of the Council in the provision of parks and open space is to encourage the development of a well-connected and integrated public open space network that contributes towards achieving a broad range of policy objectives, including:

- Improving community, health, and wellbeing Parks and open spaces provide a valuable role as a sanctuary for the community; the benefits of engaging with the natural world are now widely understood to be particularly beneficial to mental and physical health.
- Enhancing visual amenity Parks and open spaces form an attractive green and open setting which enhances the character of urban neighbourhoods in particular.

- Promoting sustainable development Parks and open spaces contribute to sustainable development objectives where they are appropriately located and accessible by walking, cycling and public transport.
- Promoting climate change adaption and mitigation Parks and open spaces provide opportunities for sustainable drainage while trees and plants perform a vital role by capturing and storing carbon.
- Reinforcing Green Infrastructure Parks and open spaces are core elements in the County's green infrastructure network
- Promotion of biodiversity Parks and open spaces offer opportunities to conserve and restore biodiversity and
 ecosystems. They are often focused on natural environments such as river valleys which support valuable wildlife
 habitats; parks also offer opportunities to increase pollinator-friendly planting.
- Supporting culture and heritage Parks and open spaces often contain heritage elements and play host to many outdoor community, arts, and cultural events.
- Supporting the local economy, including tourism Many parks and open spaces contain facilities such as cafes, heritage features and other attractions that are valuable visitor amenities.

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

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

Objective 1 of the Green Infrastructure strategy (GI6) of the Plan is: To support a hierarchy of accessible open spaces and recreational facilities, appropriate for neighbourhood size and catchment area, which are adaptable and capable of accommodating multiple uses.

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

'Local parks range in size from between 2 to 20ha. They provide mostly for amenity and passive recreation, although some may have playing pitches and play equipment; they are located in close proximity to homes and thereby easily accessible by pedestrians and cyclists. Examples of local parks in South Dublin County are Vessey and Hermitage Parks in Lucan, Ballycragh Park, Firhouse Community Centre Park and Quarryvale Park. Local Parks serve a local population within a 400m catchment. These parks primarily consist of improved grassland but offer considerable opportunities for contributing to the local level GI network through enhancement schemes that include native trees, small woodlands, hedgerows, meadows, and other planting'.

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

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

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

COS5 Objective 9: To ensure that parks and public open space are appropriately located within the County and within

development sites, to facilitate and support its multifunctional role.

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

COS5 Objective 11: To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan 20212025, the Council's Biodiversity Action Plan 2020-2026, or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.

COS5 Objective 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.

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

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

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

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

Strategic Corridor 4: Liffey Valley Corridor

The River Liffey traverses the northern boundary of the County and is a GI corridor of regional importance. It provides a 'green lung' for Dublin City / County and is a key element of the wider regional GI network, running from its origins in the Wicklow Mountains through the plains of County Kildare and through County Dublin into Dublin City Centre where it enters the sea.

Sections of the River Liffey are designated as proposed Natural Heritage Areas, while the portion within South Dublin County and Fingal County is also subject to a Special Amenity Area Order. These designations reflect the variety of habitats and protected species supported by the River Liffey.

The majestic open parkland setting of sections of the River Liffey Valley provide opportunities to strengthen the visual and landscape amenity value of the valley and create appropriately designed pedestrian and cycle routes that can traverse the County and link with amenities in adjoining counties. Overarching Objectives:

- To protect and enhance the outstanding character and ecology of the Liffey Valley Corridor, recognising its value as a key regional landscape and GI feature that supports important habitats, species, and a range of ecosystem services.
- To protect and enhance the recreation and amenity value of the Liffey Valley Corridor, recognising its environmental sensitivities.
- To enhance connectivity with the surrounding regional GI network infrastructure.
- To facilitate and support the development of the Liffey Valley as an interconnected network of parklands and

- support the development of a carefully considered greenway in collaboration with Dublin City Council, Fingal County Council, and Kildare County Council.
- To protect green and blue infrastructure within the River Liffey corridor based on the riparian corridors outlined in the Development Plan Green Infrastructure Map.
- To protect and enhance the outstanding landscape character and amenity of the Liffey Valley (see Appendix 9: South Dublin County Landscape Character Assessment, for landscape character details)

Core Areas

Areas designated SAAO and pNHA including: Lucan Demesne

- To preserve the existing woodland, trees and hedgerows at Lucan Demesne.
- To investigate the potential for enhanced connectivity between Lucan Demesne and St. Edmundsbury lands.
- To maximise the recreational amenity supported by proximity to the river within Lucan Demesne.

Liffey River Valley and Special Amenity Area Order

From the Ice Age to the present day, the River Liffey has profoundly influenced the development of the landscape and the cultural heritage of the communities that have settled along its banks, from its origins in the Wicklow Mountains, through the lowlands of County Kildare, through South Dublin County and Fingal, to where it enters the sea in Dublin City. Today, the Liffey River generally forms the administrative boundary between South Dublin County and Fingal, passing through a picturesque landscape of open parkland settings and wooded slopes overlooking the meandering river.

Village settlements at Lucan and Palmerstown represent the long interaction between local communities and the river. This is demonstrated in the range of built heritage features throughout that give these villages their unique identities, recalling a history of habitation, industry, and architectural styles from vernacular to splendid estates and ecclesiastical structures.

A Special Amenity Area Order (SAAO) was made for the Liffey Valley by Dublin County Council in 1990 and now straddles the administrative boundaries of South Dublin County Council and Fingal County Council. The extent of the area covered by the SAAO is from Lucan Bridge to Chapelizod; the area within the County is identified on the County Development Plan Land-Use Zoning maps that accompany this written statement.

An SAAO is primarily used to protect areas of outstanding natural beauty or areas with special recreational value, having regard to any benefits for nature conservation. The Liffey Valley SAAO, which runs along the northern boundary of the County, is an exceptional asset for the Greater Dublin Area with its rich scenic landscape setting and added ecological, cultural and built heritage. The SAAO includes an objective to preserve and enhance the character or special features of the area and objectives to limit development within the SAAO. The strict High Amenity zoning of the Development Plan ensures that the SAAO objectives can be met.

A section of the river valley is designated as a proposed Natural Heritage Area (pNHA) and the whole river valley is a key element of South Dublin County's Green Infrastructure Strategy. Being for the most part undeveloped, the banks of the river valley offer a natural and dark corridor between the urban areas of South Dublin and Fingal Counties which extends from Dublin City into County Kildare. This corridor is important for protected species such as light-sensitive bats, and for otter, kingfisher, and a range of other waterfowl, fish, and small mammals. Rare species of plants and insects occur in the woodlands and along the riverbank.

The Landscape Character Assessment for the Liffey River Valley identifies this area as having a Medium to High Landscape Value and Sensitivity

Policy NCBH7: Liffey River Valley and Special Amenity Area Order

Protect and enhance the special amenity value of the Liffey Valley, including its landscape, visual, recreational, ecological, geological, and built heritage value, as a key element of the County's Green Infrastructure network and implement the

provisions of the Liffey Valley Special Amenity Area Order (SAAO).

NCBH7 Objective 5:

To ensure that development proposals within the Liffey Valley, including local and regional networks of walking and cycling routes

- avoid impacts on the Valley's sensitive landscape character and ecological network;
- maximise opportunities for enhancement of existing features;
- protect and incorporate natural and built heritage features as part of the County's Green Infrastructure network;
- do not prejudice the future creation and development of interconnected public parklands

NCBH7 Objective 8:

To facilitate the development of Council owned lands adjacent to the Hermitage Clinic and elsewhere within the Liffey Valley as publicly accessible parkland and Green Infrastructure links, as appropriate.



Figure 1. Zoning Map

Riparian Corridors

Riparian corridors are now regarded as essential for ecosystem service provision. The benefits of Riparian Corridors are addressed in detail in Chapter 4: Green Infrastructure, Section 4.2.2 Sustainable Water Management, relevant policy and objectives are also set out in that section

Landscape Character Types: River Valleys

- Principal rivers of the county with alluvium soils draining to Dublin Bay.
- Generally, rise in the foothills or mountains and ultimately drain northeasterly to Dublin Bay.
- Riparian vegetation and treelines including alluvial woodland are an attractive landscape and ecological feature.
- Varies between wider, more mature river valleys and incised, narrow valleys that create more dramatic landscapes.

GI3 Objective 2: To require development proposals that are within riparian corridors to demonstrate how the integrity of

the riparian corridor can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology.

Objective 3: To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained / reinstated along all watercourses within any development site

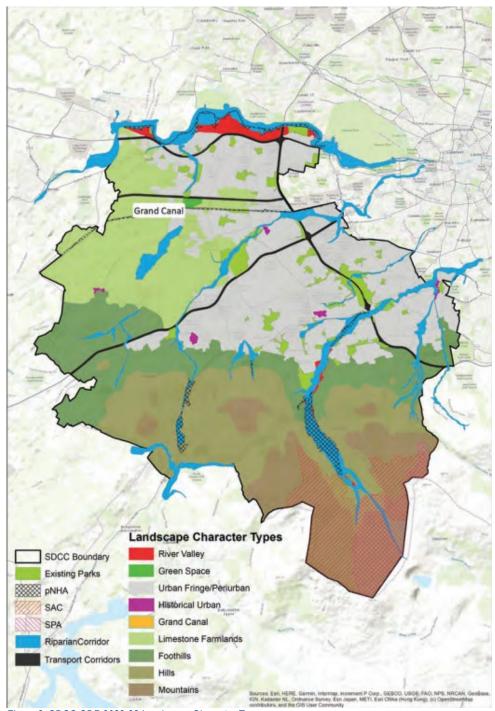


Figure 2. SDCC CDP 2022-28 Landscape Character Types

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 set out above and other relevant plans and policies.

The site is zoned in principle for open space and is actively used for recreational amenity and an entrance into Lucan Demesne Park. The adopted development plan has been subject to AA and EIA and considered the land use and classes of development such as the proposed would be open to consideration on lands zoned 'Open Space'. The AA for the plan concluded that its implementation would not result in significant effects on the environment. The EIA sets out that all mitigation measures be carried out including the implementation of a construction management plan in order to sensitively approach the development, however, it concluded that there will be no real likelihood of significant effects on the environment.

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.

5.0 Recommendation

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

It is recommended that, as the proposal is in conformity with proper planning and sustainable development, that the Council proceed with the Part 8 proposal for the Upgrade works for the entrance and route into Lucan Demesne Park, in the townland of Lucan, Co. Dublin.