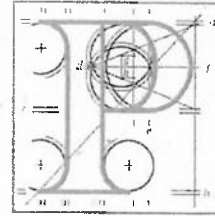


**Our Case Number:** ABP-322638-25



**An  
Bord  
Pleanála**

Development Applications Unit  
The Manager  
Newtown Road  
Wexford  
Y35 AP90

**Date:** 15 July 2025

**Re:** Proposed residential development at the Kishoge Development area of Clonburris SDZ  
In the townlands of Kishoge, Esker South, Grange and Balgaddy, Clonburris, County Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin  
Executive Officer  
Direct Line: 01-8737244

JA03

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Lauren Griffin

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**From:** Lauren Griffin  
**Sent:** Tuesday, 15 July 2025 12:44  
**To:** David OConnor (Housing)  
**Subject:** RE: Clonburris SDZ Part10

A Chara,

The Commission acknowledges receipt of your email, official correspondence will issue in due course.

Kind regards,

Lauren

---

**From:** David OConnor (Housing) <[David.OConnor@npws.gov.ie](mailto:David.OConnor@npws.gov.ie)>  
**Sent:** Monday, 14 July 2025 16:23  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** Clonburris SDZ Part10

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara

Please find attached Archaeological and Nature Conservation observations/recommendations for the above mentioned planning application.

Kindly forward a copy of your decision to [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie) as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie)

Kind regards,

**David O'Connor**  
*Executive Officer*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
**Department of Housing, Local Government and Heritage**  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90  
Newtown Road, Wexford, County Wexford, Y35 AP90



**An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreachta**  
Department of Housing,  
Local Government and Heritage



**Ref: Part 10 Kishoge Development area of Clonburris SDZ**

14 July 2025

The Secretary  
An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1  
D01 V902

Via email: [laps@pleanala.ie](mailto:laps@pleanala.ie)

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

**Development South Dublin county council part x application to An Coimisiún Pleanála – proposed residential development, at the Kishoge development area of Clonburris Strategy Development Zone (SDZ)**

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

### **Nature Conservation**

Having considered the documentation supporting the present application, and particularly the environmental Impact Assessment Report (EIAR), it is noted that various potential adverse effects of the proposed development on locally occurring flora, fauna and ecologically significant habitats have been identified and that measures to mitigate these effects during both its construction and operational phases have been proposed in the documentation. Amongst the possible adverse effects on biodiversity identified which may result from the proposed development are the pollution of the Kilmahuddrick Stream, the removal of tree, hedgerows and other habitats of ecological value on the development site and the destruction of plants of two orchid species (pyramidal and bee orchids) and of protected plant species, lesser centaury, which possibly occurs on two sections of the development site, denominated as Site 3 and Site 4 in the documentation supporting this application. Potential effects on bird species, non-volant mammals and bat species have also been identified.

**Aonad na nIarratas ar Fhorbairt, Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Y35 AP90**  
Development Applications Unit, Government Offices, Newtown Road, Wexford, Y35 AP90  
[manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie)  
[www.gov.ie/housing](http://www.gov.ie/housing)



In order to prevent the mobilisation of pollutants into surface water runoff during the development's construction phase various measures are proposed, including following best practice with regards to the handling and storage of hydrocarbons and cementitious materials and the employment of silt fencing. Other measures set out in the supporting documentation to avoid or mitigate the adverse effects of the proposed development on elements of biodiversity include the retention of certain trees and parts of hedgerows, and of sections of the development site supporting orchid species and lesser centaury. The transplantation of individual plants of orchid species and lesser centaury into some of the retained open spaces within the landscaping of the development is in addition proposed. But it should be noted, in order to interfere with the sections of the development site where lesser centaury occurs and for the transplantation of plants of this species a licence will have to be applied for and obtained from the Department independently of any planning permission granted in response to the current application. A number measures to enhance biodiversity during the operational phase of the development are also proposed such as the provision of bug hotels, the installation of bat boxes and the minimisation of light pollution.

If all the measures set out in the EIAR and other documentation supporting the current application to mitigate the proposed development's possible adverse effects on biodiversity are implemented diligently and in full, they should minimise such effects in as far as is feasible given the scale of the development proposed. The inclusion of planting of large numbers of trees and shrubs as part of the landscaping of new development should in the longer term also allow the recolonization of the redeveloped area by many species such as birds and insects displaced during the development's construction phase.

Unfortunately however, as part of the landscaping of the proposed development it is in addition proposed to plant various species of wildflowers and herbaceous species of plants such as cowslip *Primula veris*, primrose *P. vulgaris*, meadow sweet *Filipendula ulmaria* and lady's smock *Cardamine pratensis*. Such planting of commercially sourced seed or plants of these native species as proposed would threaten the genetic integrity of the locally occurring populations of wildflowers indigenous to the Kishoge/ Clonburris area, and it should be noted in this context that the revised All-Ireland Pollinator Plan advises against planting wildflower seed outside a garden setting. To clarify, the following points are taken from the Position Paper by the Dublin Naturalists' Field Club entitled '*The case against 'Wildflower' seed mixtures*' which is endorsed by the All-Ireland Pollinator Plan and reproduced on their website.

- Seeds of non-local origin – even if the species are native – introduce new genetic strains which may displace or compromise the local, naturally-occurring flora.



- Local, native species do not need to be sown. Native plants colonise suitable habitats by natural means.
- Seeds which are commercially produced and deliberately sown cannot, by definition, be wild and introducing them to the natural environment does not contribute to addressing biodiversity loss.

The genetic integrity of what remains of our rare and ecologically significant native species is, therefore, threatened by the introduction of seed from external sources. Pollen from these geographical insertions and intrusions cannot be prevented from fertilizing the local native stock of the same species or causing hybridisation with other closely related species. It is therefore advised no commercially sourced 'wildflower' seeds should be planted on the development site but locally occurring wildflower species should be allowed naturally colonise open space areas by natural seed dispersal or grow up from the soil seed bank. In particular given the development site's location adjacent to a pNHA it is important that local biodiversity is not threatened due to the spread of plants of commercial 'wildflower' origin spreading into the Grand Canal pNHA and hybridising with the local populations of the same species present in the latter site.

### **Recommendations**

In view of the above it is recommended that the following conditions should be attached to any planning permission granted in response to the present application:

That the measures set out in the EIAR and other documentation supporting this application to mitigate the proposed development's effects on biodiversity shall be implemented in full and under the supervision of an Ecological Clerk of Works during the construction and operational phases of the proposed development.

**Reason: To avoid and minimise the effects of the proposed development on locally occurring flora, fauna and ecologically significant habitats.**

That no commercially sourced 'wildflower' seed mixes or plants of native wildflower species shall be utilised in landscaping of the proposed development, with any meadow areas and SuDs features to be established within the proposed development to be allowed to be colonised by natural dispersal and from the soil seed bank by locally occurring wildflower species.



**Reason: To protect biodiversity by maintaining the genetic integrity of local naturally occurring wildflower populations, particularly within the Grand Canal pNHA.**

### **Archaeology**

It is noted that the proposed development site is relatively large in scale (greater than 0.5ha). It is possible that hitherto previously unknown archaeological features/deposits may be disturbed during the course of groundworks required for the proposed development.

The Department is in receipt of an EIAR report for the proposed development that has been compiled by Stephen Little & Associates. Chapter 16 'Archaeology' has been compiled by Ms Faith Bailey and John Gallacher of IAC Archaeology.

According to Chapter 16, the proposed development comprises of three separate land parcels: Site 3; Site 4 and; Site 5. There are no recorded monuments in any of the three sites. Archaeological testing was carried out in part of Site 3 under licence 24E0780. The final report was not available to the authors of Chapter 16, though it is stated in the chapter that nothing of archaeological significance was identified during testing.

According to Chapter 16, archaeological testing was carried out in a small part of Site 4 in advance of a new road under Licence 20E0390. Part of a larger post medieval brick kiln was identified in the area of the road. The brick kiln likely extends beyond the area of the road. According to Chapter 16, Site 5 comprises three separate areas. One archaeological test trench was previously investigated within Site 5 under Licence 24E0707. No features of archaeological significance were identified.

According to Chapter 16, each of the three sites have low to negligible potential for unknown archaeological features and / or deposits to survive. Much of the three sites have been previously disturbed. It is recommended in Chapter 16 that the stripping of all remaining undisturbed topsoil within Site3, Site 4 and Site 5 be subject to archaeological monitoring. The Department agrees with this recommendation.

Therefore, the Department of Housing, Local Government and Heritage, in line with national policy —see Section 3.7 of Frameworks and Principles for the Protection of the Archaeological Heritage 1999— recommends that Licensed Archaeological Monitoring, as described below, should be required as a **Condition** of planning. A report containing the



results of the archaeological monitoring and any subsequent required archaeological work should be submitted to this Department and the Planning Authority.

Please note that this recommended Condition aligns with Sample Condition C3 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

#### **Recommended Archaeological Condition**

1. The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all topsoil stripping. The use of appropriate machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary.
2. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the Department, regarding appropriate mitigation [*preservation in-situ/excavation*].
3. The developer shall facilitate the archaeologist in recording any remains identified. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the Department, shall be complied with by the developer.
4. Following the completion of all archaeological work on site and any necessary post-excavation specialist analysis, the planning authority and this Department shall be furnished with a final archaeological report describing the results of the monitoring and any subsequent required archaeological investigative work/excavation required. All resulting and associated archaeological costs shall be borne by the developer.

**Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.**

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager.DAU@npws.gov.ie](mailto:manager.DAU@npws.gov.ie), where used, or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90



Is mise, le meas

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David O'Connor  
Development Applications Unit  
Administration