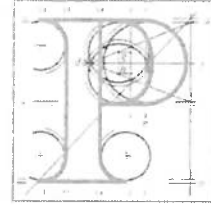


Our Case Number: ABP-316828-23



**An
Bord
Pleanála**

St. James Gaels / An Chaisleán
64 Kilnamanagh Road
Walkinstown
Dublin 12

Date: 03 April 2024

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

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

Lauren Griffin

From: Lauren Griffin
Sent: Wednesday 3 April 2024 09:28
To: [REDACTED]
Subject: RE: submission on case number ABP-316828-23

A Chara,

The Board acknowledges receipt of this email, official acknowledgment will issue in due course.

Kind regards,

Lauren

From: Chairperson St James Gaels Dublin <[REDACTED]>
Sent: Tuesday, April 2, 2024 2:14 PM
To: LAPS <laps@pleanala.ie>
Cc: Secretary St James Gaels Dublin <[REDACTED]>
Subject: submission on case number ABP-316828-23

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.

Dear An Bord Pleanala,

Please find attached a submission by St James Gaels / An Caislean Gaa club on a response by the planning applicant for the Clondalkin/ Tallaght Bus corridor.

Please acknowledge receipt of the submission ahead of the deadline of 1730hrs today by return email.

Regards and Thanks

Liam

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Tá an ríomhphost seo, chomh maith le ceangaltán ar bith a bhaineann leis, faoi rún agus baineann sé leis an duine nó leis an aonán a bhfuil an seoladh seo aige/aici, amháin. Baineann aon tuairim nó barúil a nochtar leis an údar amháin agus ní gá go mbeadh aon bhaint ag na tuairimí sin le tuairimí an Chumainn. Má fuair tú an ríomhphost seo trí bhotún, cuir an duine a chuir chugat é ar an eolas le do thoil. Cé go ndéanann an Cumann scanadh ar r-phoist agus ar cheangaltán le haghaidh víreas, níl aon chinnteacht go bhfuil ceachtar acu saor ó víris. Ní ghlacann an Cumann le dlíteanas ar bith i leith aon damáiste a eascraíonn as víris.

St James Gaels/An Caisleán Gaa Club

64 Kilnamanagh Road,

Walkinstown,

Dublin 12.

28/3/2024

Case number ABP-316828-23

An Bord Pleanála,

St James Gaels / An Caisleán would like to make a submission in the above case.

St James Gaels / An Caisleán Gaa club would firstly like to state its disappointment that it will not be given an oral hearing.

This TCPO of our playing field was never communicated with the club. The first info on this was a sign erected on the lamppost at the park in May 2023

This is a shocking way to treat a club, run by volunteers. We provide sport and recreation to the local community; it is very disappointing by the applicant.

Submission

Pitch Safety

On page 120 of the GAA Club Manual Chapter 8 Providing Facilities, it states that at least 5 meters run off space around the playing area should be provided for safety reasons.

Figure 2.5.15 shows the extent of the proposed temporary construction compound at Bunting Park superimposed on the aerial background mapping. The extents of the compound are approximately 10.0m from the edge of the playing area. As such there is no impact on safety in respect of the run-off zone at this location. In addition, there will be no impact on the required ball stops.



Figure 2.5.15: Extent of Temporary Compound TC8 on aerial imagery (Image Source: Google)

As stated in Section 5.5.5 of EIAR Chapter 5, "On completion of construction, all construction facilities and equipment such as plant, materials, temporary signage, and laydown areas, Construction

Compounds, etc. will be removed. The area which was occupied by the Construction Compounds will be reinstated (refer to the Landscaping General Arrangement Drawings (BCIDA-ACM-ENV_LA-0809_XX_00-DR-LL-9001) in Volume 3 of this EIAR)."

In summary, the pitch will remain usable at all times while the temporary construction compound is in place and the park will be reinstated after construction works are completed.

The above shows the copy of the response from the applicant on pitch safety. In the applicants response it has completely ignored the point that the area for the Temporary site compound is where we train juvenile teams. This can't be ignored the applicant has

not even considered it. The applicant has ignored a genuine fact based objection. No compound can go here. We would welcome proper conversation on the matter.

Anti-social behaviour

In respect of any temporary lighting arrangements during construction, Section 5.5.2.9 of Chapter 5 Construction of Volume 2 of the EIAR states the following: "The majority of the Proposed Scheme is already artificially lit. However temporary lighting will be required at times along the Proposed Scheme at certain locations during the Construction Phase, as necessary. Where it is necessary to disconnect public lighting during the construction works or to undertake works outside of daylight hours where existing lighting is low, appropriate temporary lighting will be provided. Temporary lighting will also be installed at the Construction Compounds for the duration of the Construction Phase"

Section 5.5.2.9 goes on to state that: "The standard of temporary lighting installed during the Construction Phase will meet the standard of the existing carriageway and will be appropriate to the speed and volume of traffic during construction. Temporary construction lighting will generally be provided by tower mounted floodlights, which will be cowled and angled downwards to minimise spillage of light from the site."

As stated in Section 5.5.2.8 Construction Compounds of Chapter 5 Construction of Volume 2 of the EIAR: "As part of preparatory works, the Construction Compounds will be set up which will include installation of the necessary facilities including the site office, welfare facilities, etc. Controlled access to the Construction Compounds will be implemented, fencing will be erected, and lighting will be installed. The Construction Compounds will be secured with Closed-Circuit Television (CCTV) to ensure safe storage of all material, plant and equipment."

The temporary lighting and CCTV which will be installed at the construction compound are anticipated to deter anti-social behaviour from the vicinity of the compound and will ensure that there is no adverse impact on the safety of the entrance to the park.

Copy above of the applicant's response to the issue of Anti-Social behaviour the club finds the response to a legitimate concern both vague and generic. To simply say cctv will be installed and it is anticipated this will deter anti social behaviour is very weak. The park has a significant problem with anti social behaviour and drug dealing. (evidence available from Dublin 12 police forum)

Many of our coaches have had to sweep clean the area before activities. The local residents will not enter the park after dark or when there is no sporting activity, this is due to the intimidation from youths gathering.

This last winter there have been wheelie bins burned several times on the grass area. The local Residents association are asking for the hedge to be removed for a number of years to prevent a screen for this behaviour. To add more screens and hope a light or camera will deter it is naive. The applicant has not properly considered our legitimate objection and must now engage with the club.

Drainage

As described in Section 5.4.4.1.1 Construction Compounds of Appendix 5.1 of Volume 4 of the EIAR "The general measures for Construction Compounds will apply, however as most of the compounds are located on greenfield sites with no retaining wall to prevent overland flows of polluting

substances to local surface water drains, additional measures are required. Site fencing will include a silt fence for the perimeter of the site to prevent over land flows. Surface water drains at access points will be covered."

Further, Section 5.4.5.1.1 Construction Compound Establishment of Appendix 5.1 of Volume 4 of the EIAR notes "All surface water runoff will be intercepted and directed to appropriate treatment systems / settlement facilities for the removal of pollutants prior to discharge. Further information of the Construction Compounds is provided in Section 5.7 in Chapter 5 (Construction) in Volume 2 of this EIAR."

It is therefore not anticipated that the temporary construction compound will give rise to any drainage issues within the park.

Copy above of the applicant's response to the club objection.

The clubs point on drainage has not being considered at all.

There is no evidence that the applicant properly appraised bunting park for drainage impact. The applicant says,

"The compound is on an area that does not flood and no drainage issues are anticipated"

It mentions controlling the run off and installing "silt fencing at the perimeter "again very generic no consideration of the high saturation rates of the park that exist. It is only dealing with containing the compound overspill not what value the soil has for the wider park drainage.

In figure 2.5.15 p157 shows a brown area on and beside the pitch. (This picture was used by the applicant to respond to the clubs ball stop issue) the site of a former playground.

A former playground and approach paths where only removed on the surface. Soil was over laid and grass grown. When we have heavy rains this area, being less permeable needs the soakaway of the rest of the park.

To place a 1100m² compound on well-drained soil will make our pitch unplayable more often than not.

In 2023, the club has successfully engaged with DCC for support in the form of Sports Capital Grant Aid to install power, and potable water to provide toilets and power to our compound.

The club has asked DCC to provide a SUDS evaluation of the park to improve pitch drainage. Our priority is basic power and welfare facilities. We see the installation of drainage improvements secondary (requiring future capital grant aid) and hope that natural soakaways will keep the full pitch playable for 6 to 8 months of the year. We would then apply to improve drainage after we have facilities.

The applicant has not considered any of this and if following Sustainable drainage best practice would have conducted a proper drainage impact assessment on the park.

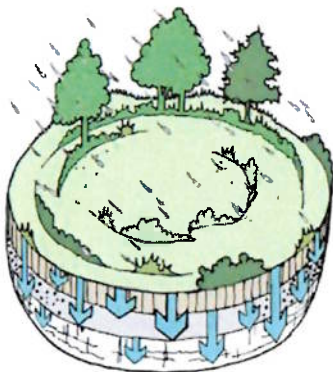
As previously mentioned DCC is spending Public money to reduce the impact of the Camac River. More and more green and brownfield areas are being developed reducing natural soakaways resulting in saturation as the Camac has to handle all the extra surface water.

See pic from the latest DCC Sustainable Drainage Design & Evaluation guide 2021 (conducted by McCloy Consulting & Robert Bray Associates).

2.2 The ground becomes saturated

After a while the surface of the landscape can absorb no more water.

Where the ground is **permeable** water begins to soak into lower soil profiles and then the underlying geology. This is called **infiltration** and is common on sandy, gravelly and limestone soils.



In landscapes with infiltrating soils after interception losses have taken place, most rainwater is lost soaking into the ground.

Where the ground is **impermeable** water begins to trickle and flow across the surface, collects in natural depressions, and is stored in wetlands. These natural features attenuate the rate and volume of flow of rainwater running off the landscape. These flows are called **natural** or **greenfield runoff**.



*Surface flow rates are small at first, but increase with higher **intensity** rainfall events. The **volume** of runoff will generally be greater with increased rainfall intensity and duration.*

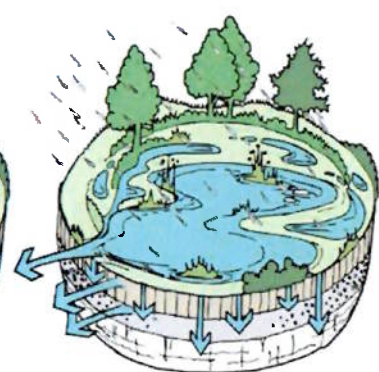
2.3 Natural losses continue during heavy rain

In many soils, both a degree of infiltration and surface runoff can occur simultaneously.

Once the ground is saturated there are ongoing natural losses that occur during rainfall, particularly where the ground has some permeability.

During warmer weather when the ground is relatively dry, interception and ongoing natural losses will occur during most rainfall events.

Interception and ongoing losses are the two elements of total natural losses.



This dynamic process varies in accordance with permeability, the preceding weather conditions and extent of ground compaction or vegetation cover.

Sustainable Drainage is a way of managing rainfall that mimics natural drainage processes and reduces the impact of development on communities and the environment

This compound cannot be placed here without proper meeting with club reps and consideration of drainage to alleviate the removal of the soakaway by 1100m². This will allow the pitch drain.

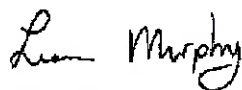
In summary

ST James Gaels /An Caisleán GAA Club would like further consultation and a meeting with the applicant on the responses it issued

The operations of our club and its passive surveillance of the park on weekends and nights has greatly enhanced the community. To affect this in any way cannot happen

There is already a lack of green space in Dublin 12.

Yours in sport



Liam Murphy

Chairperson

St James Gaels/ An Caisleán Gaa Club

For and on behalf of the members and executive committee

28/3/2024