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- (a) Planning and Development Act 2000 (as amended) & Planning and Development Regulations 2001 (as amended) (Part 8)**
(b) Local Government Act 2001
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In compliance with the provisions of Section 179 of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) and in compliance with the provisions of the Local Government Act 2001 and pursuant to the requirements of the above, notice is hereby given of Dublin City Council's intention to carry out the following works:

(A) The Site

Western bank of The River Dodder between Herbert Park and Anglesea Bridge, Dublin 4

(B) The Proposal

Pursuant to the requirements of the above, notice is hereby given of the proposal to amend the previously approved planning permission 2504/13 for Dodder Flood Alleviation works to include for the modification of the planned flood defence works between Herbert Park and Anglesea Bridge in order to allow for the provision of a high quality pedestrian and cyclist route (greenway) linking Donnybrook Road and Herbert Park. It is proposed:

- . To widen a 120 m section of the originally planned flood embankment to allow for the construction of a greenway along its length.
- . To alter the line of approximately 140m, and cantilever over the riverbank approximately 130m, of the originally planned flood wall in order that the greenway can be constructed between the flood wall and the neighbouring pitches and tennis courts
- . To remove some existing low value trees and provide a new tree planting scheme.
- . To install a new boundary fence between the greenway and the neighbouring property belonging to the Leinster Branch of the IRFU.
- . to provide beech hedging or similar as screening on the Leinster Branch side of the boundary fence.

(C) Site Planning History

1. Site Planning History

2504/13 – Previously approved Part 8 procedure for Flood Alleviation works, Phases 2c,2d & 2e River Dodder Part 8 proposals, Lansdowne Road Railway Bridge to Smurfit Weirs, Dublin 4. The proposal is to increase the flood defence levels in the above areas to cope

with the worst modelled 1 in 200 year river (fluvial) and tidal event up to the tidal weir upstream of Ballsbridge and the worst 100 year fluvial event up to the lower Smurfit weir. This will involve the construction of floodwalls and embankments to achieve this. This programme of works falls out of the Dodder Catchments Flood Risk Assessment and Management Study approved by Dublin City Council in February 2013.

(D) Area Committee

The South East Area Committee were informed of the initiation of the Part 8 planning process for the proposed development at its meeting on the 13th of March 2017.

(E) Statutory Submissions/Observations

A number of observations were received within the statutory time frame. These have been noted and are summarised as follows;

- It may be possible to provide a riverside park if DCC enter into negotiations with the IRFU for a land swap to provide at least a 3m corridor from Anglesea Bridge to Herbert Park in lieu of some DCC land adjoining the Electricity Sub-Station.
- Additional tennis courts could be provided between the end of the second rugby pitch and the boundary with Eglinton Terrace.
- A raised level embankment with a pathway on top of between 3 and 4 meters wide could be constructed along the entire stretch between Anglesea Bridge and Herbert Park.
- A boundary wall/fence will have to be constructed alongside the rugby grounds. This should form the basis of any flood defence wall rather than caging the riverside park on both sides.
- As much as possible of the existing landscape character should be conserved.
- Relocating the flood defence walls away from the stadium walls and placing the greenway adjacent to the stadium would seriously diminish the amenity and the conservation of the existing landscape and biodiversity.
- The inclusion of a second 'parallel' Greenway Route that allows for shared use along the minor roads of Brookvale Road and Eglinton Terrace for should be considered.
- The preparation of a Dodder Greenway Development Plan, agreed by all 3 relevant local authorities is a necessity.
- The existing character of the landscape within the area was never clarified.
- There will be a visual impact when the 120m of cantilever is constructed.
- The cantilever design will result in loss of connectivity for wildlife along the riverbank.
- New and dedicated Landscape and Works Condition should be recommended for inclusion in this Part 8.
- The location of defence walls would reduce connectivity to the river itself and views to the river would be obstructed.
- A suitable lighting scheme subject to the approval of DCC Parks should be recommended for inclusion in this Part 8.
- Information boards including map of the areas and points of interest should be included in the design.
- Appropriate bins should also be provided along the route.

- Archaeology should be addressed during the construction phase.
- A condition to combat invasive species should be included.
- Lands adjacent to the Anglesea Bridge should be landscaped for public use.
- Bective Lawn Tennis Club, (BLTC) is a leaseholder of a large portion of the lands and have not been consulted by DCC with regard to this Part 8.
- BLTC will lose two tennis courts which will be used as a construction site. There will also be a loss of privacy due to the proximity of the proposed greenway and there is a lack of allowance for planted screening in the current proposals.
- The vertical position of the ESB cable that runs through the site does not seem to be in the correct position.
- If DCC had liaised with the tennis club a simpler solution to the pinch point cantilever option could have been agreed.
- Dublin Cycling Campaign – Photo-montages show a shared pedestrian/cyclist space. In order to reduce user conflict surface treatment and regular decals should be used to delineate between both areas. The junction at Donnybrook needs to be redesigned to allow pedestrians and cyclists to join and exit the Greenway conveniently.
- The exit to Eglinton Terrace seems to be unnecessarily complicated, the junction with Donnybrook should be carefully considered from a safety point of view.

(F) Evaluation

A: Development Plan Policy

Policy SC3: To develop a sustainable network of safe, clean, attractive pedestrian routes, lanes and cycleways in order to make the city more coherent and navigable.

Policy MT1: To support the sustainability principles set out in the following documents

- National Cycling Policy Framework and National Cycle Manual

Policy MT7: To improve the city's environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with Green Infrastructure Objectives and on foot of (*inter alia*) the NTA's Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.

Objective MTO9: To develop, within the lifetime of this plan, the Strategic Cycle Network for Dublin city - connecting key city centre destinations to the wider city and the national cycle network, and to implement the NTA's Greater Dublin Area Cycle Network Plan; to bring forward planning and design of the Santry River Greenway, incorporating strongly integrative social and community development initiatives.

Objective MTO10: To improve existing cycleways and bicycle priority measures throughout the city, and to create guarded cycle lanes, where appropriate and feasible.

Policy SI27: To require lighting design to be appropriate to the end use in relation to residential areas, footpaths, cycle paths, urban streets and highways i.e. use of low level bollard lighting along cycle paths

Objective GIO4: To improve pedestrian and cycle access routes to strategic level amenities while ensuring that ecosystem functions and existing amenity uses are not compromised and existing biodiversity and heritage is protected and enhanced.

B: Development Plan Zoning

The site is zoned Z9, *'To preserve, provide and improve recreational amenity and open space and green networks'*.

The site is also within a designated Conservation Area and also within a Zone of Archaeological Influence.

C: Referrals

Response received from the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs and included the following points;

- The Department notes that the survey work for the 2013 Environmental Report did not identify badger setts which were impacted by the works....and the amended proposal will impact on at least one active badger sett. It is unclear as to what mitigation measures are proposed for the badgers, which are a protected species under the Wildlife Acts.
- The survey work in 2013 did not identify the otter holt on the south eastern bank and the current report also missed the other holt identified by Roughan O'Donovan in 2016 on the site to be affected by the current proposal.
- The Department would welcome further co-ordination between DCC and the lead authority for the Dodder Greenway, SDCC, and the ecological consultants for the scheme, Roughan O'Donovan.
- The impact of lighting on existing wildlife and in particular bats and otters, has not been assessed.
- ROD are currently doing one overall ecological assessment of the complete greenway project which will be submitted with each Part 8 application.
- The Flora survey was carried out a little too early in order to get a comprehensive result.
- A Construction Management Plan has not been prepared and a full planting plan is not set out.
- With regard to the AA, it is unclear why a 15km distance has been used for the project. The cumulative effects of ongoing projects have not been taken into account.

Interdepartmental Reports

- **Drainage Division** - There is no objection to the proposed development.
- **Parks & Landscape Services** -
The information supplied indicates that there will be impacts on existing bankside vegetation including trees as a result of the proposals. No detailed tree survey or landscape proposals have been submitted as part of this application.

Japanese knotweed is noted as being present. Consideration should be given to higher quality fence boundaries along the proposed scheme. Parks & Landscape Services have no objection to the proposed works subject to clarity on tree

protection and compensatory planting as well as measures to control Japanese Knotweed which is an invasive alien species.

Recommended Conditions

The following conditions are advised for this application taking into account the comments given above and subject to approval of the proposed development , if any:

Landscape Scheme to be submitted - Development shall not commence until a landscape scheme prepared by a qualified landscape architect ,comprising full details of the size, species and location of all trees and shrubs to be planted and the treatment of all external ground surfaces ,has been submitted to and agreed in writing by the Planning Authority and implemented in the first planting season following completion of the development, and any trees and shrubs which die or are removed within 3 years of planting shall be replaced in the following season (The landscape scheme shall have regard to the Guidelines for Open Space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

The landscape scheme shall also include the following:

1. Existing trees & vegetation to be retained. Existing trees/vegetation to be removed. Proposed compensatory planting.
2. Cross-sections
3. Alignment of tree/vegetation protection fence.
4. Proposed boundaries.
5. Details of maintenance during the establishment period.

Tree Protection - All trees & vegetation shown to be retained on the site and adjacent to the site, shall be adequately protected during the period of construction as per BS 5837, such measures to include a protection fence beyond the branch spread, with no construction work or storage carried out within the protective barrier. (The tree protection measures shall have regard to the Guidelines for Open space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

Invasive Species - Prior to commencement of works, the developer shall submit documentation prepared by a suitably qualified person stating whether any invasive species are located within the site. Where such species are identified, the developer shall submit details of proposals to safely remove the plant material which shall be agreed with Dublin City Council prior to any works on site.

• **Environment and Transportation Department.**

The report from the Environment and Transportation Department details the history and context of the proposal and sets out the supporting planning policy as contained in the Dublin City Development Plan 2016-2022. It also contains detailed responses to the concerns raised in third party observations during the public consultation stage.

The detailed responses are summarised as follows;

- i. Green Infrastructure - The design team notes the distinction between green infrastructure and greenways. It will take the themes and recommendations of the

Dublin City Biodiversity Action Plan 2015-2020 into consideration when developing the detailed design for this scheme.

- ii. Bats, Otters and Lighting - Details on the lighting system will be devised as part of the detailed design stage, and will take into account bat-sensitive lighting.
- iii. Bats - No bat roosts were identified in the location of the proposed works that this Part 8 application refers. Mitigation requirements outlined in the 2013 Environmental Report for the Dodder Flood Alleviation Works Phases 2C - 2E also apply to all works proposed under this Part 8 Application.
- iv. Otter Holt - As part of the environmental assessment of the proposed variation, a site visit was undertaken on the 31st January 2017 by the project ecologist. No holts or signs of otters were observed during this survey. Roughan O Donovan (ROD) are currently carrying out an EclA of the entire Dodder Greenway. A potential otter holt was identified by ROD in 2016 on the northern bank of the Dodder, 30m upstream of Herbert Park. ROD submitted an application to derogate from the Habitats Directive to disturb otter shelters along the Dodder Greenway. It is expected that the ROD licence application will cover this Part 8 Amendment, as it relates to the Greenway. Mitigation measures are outlined in the licence application and will apply to all works proposed under the subject Part 8.
- v. Badgers - A survey conducted by ROD in 2016 identified four Outlier Setts on the southern bank opposite the works area. In addition two Outlier Setts, one active and the other which appeared inactive, were identified on the northern bank, both of which could potentially be impacted by the works. ROD has prepared an EclA including derogation licences submitted to the DAHG to allow for the entire greenway including the amended works proposed in this Part 8. It is therefore expected that the derogation licences applied for by ROD in relation to the disturbance of badger setts and otter shelters would apply to the works proposed under this Part 8 Application. The mitigation requirements of the derogation licence submitted by ROD for the Dodder Greenway for badgers will therefore apply.
- vi. Cumulative Impact Assessment and Project Splitting – ROD have recently prepared an Ecological Impact Assessment (EclA) for the Dodder Greenway including the works proposed under this amending Part 8. Whilst it is proposed that the Dodder Greenway will be constructed by a number of local authorities under separate Part 8 applications, the overall project has not been split but assessed as a whole. Further, and as discussed previously, this Part 8 Amendment refers to a proposed variation to the Dodder Flood Alleviation Works Phase 2C-2E. A full environmental assessment was carried out on the entirety of these works in 2013. It is proposed that the EclA of the proposed Dodder Greenway as well as the 2013 Environmental Report for the Dodder Flood Alleviation Works Phases 2C - 2E be read concurrently to this Part 8 application for the proposed Dodder Flood Alleviation Works Amendment.
- vii. Flora Survey – On foot of comments from the DAHG recommending that an additional flora survey be carried out in July/August, an additional survey was carried out in the first week of August 2017. The report on this survey has yet to be finalised but it has been confirmed by the project ecologist that there are no rare or protected species in the area of the proposed works.

- viii. Construction Management Plans - Details on the construction phase of the Part 8 Amendment are outlined in Section 4, 'Scheme Construction', of the Environmental Annex Report accompanying the subject Part 8. In addition, each section of the Environmental Annex Report assesses potential construction stage impacts, and includes proposed construction related mitigation measures. As outlined in the report, 'a detailed construction management plan will be prepared by the contractor prior to commencement of any works on site.' The DAHG requirement that the CMP includes methods to ensure alien species are not introduced or spread is noted.
- ix. Licences – As noted previously, ROD has prepared an EclA including derogation licences submitted to the DAHG to allow for the entire greenway including the amended works proposed in this Part 8. No derogation licences have been sought under this Part 8 application relating to the Dodder Flood Alleviation Works Amendment. ROD have advised that the derogation licences sought under the Dodder Greenway will cover the proposed Flood Alleviation Part 8 works. The DAHG also stressed that licences will be required if there are impacts on other protected species or their resting or breeding places, such as birds nests etc. The Environmental Report for the proposed Dodder Flood Alleviation Works Amendment sets out mitigation measures relating to impacts on breeding birds, which address the concerns of the DAHG.
- x. AA Screening Distance - The use of the 15 km buffer in the Report for the Purposes of AA Screening is taken from the published Guidance document, 'Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities' (Department of Environment, Heritage and Local Government, 2009). A distance of 15km was considered appropriate for this project, and hydrologically downstream sites including estuarine and marine designated areas were further addressed as the primary receptor of potential impacts.
- xi. Cumulative Assessment - The portion of the Greenway which is the subject of the Environmental Report for the proposed Dodder Flood Alleviation Works Amendment is also assessed under both the 2013 Environmental Assessment of the Dodder Flood Alleviation Works Phase 2C-2E as well as the EclA for the proposed Dodder Greenway (which takes into account projects such as the Dodder Greenway, Royal Canal, Grand Canal and Liffey Greenways). It is therefore considered that the cumulative environmental impact of the proposed variation has been appropriately assessed.
- xii. Restoration of existing landscape character - The photomontages were prepared to illustrate the walkway/cycleway, and restoration/mitigation indicated is to reinstate as much of the existing (original) riverbank vegetation as possible – but without an actual developed planting plan. (*Note: The Parks and Landscape Service recommend that a Landscape Scheme be prepared prior to the commencement of development*).

In the context of the overall river setting, and also the provision of a walkway/cycleway where heretofore the riverbank has been almost entirely inaccessible, there will be change, and significant change. The comment however seems to imply that change by its nature is necessarily negative. The development will open up the riverbank and facilitate pedestrian and cycle access along the river.

- xiii. Invasive Species – Mitigation measures relating to invasive species are outlined in the 2013 Environmental Assessment of the Dodder Flood Alleviation Works Phases 2C – 2E and also to the works proposed under the subject Part 8. It is proposed that the EclA of the proposed Dodder Greenway as well as the 2013 Environmental Report for the Dodder Flood Alleviation Works Phases 2C - 2E be read concurrently to this Part 8 application for the proposed Dodder Flood Alleviation Works Amendment.
- xiv. Boundaries - A specific boundary and landscape plan has been undertaken during the preliminary stage of this commission and will be further detailed during the detailed design stage in order to solve boundary and security issues. Consultation with stakeholders will be undertaken and any conflicts in terms of the boundaries will be examined at detailed design stage.
- xv. Geometry and structural arrangement - The position of the ESB cable shown on the drawings is based on a CAT scan survey which was undertaken by specialised surveyors early this year. Preliminary discussions have already been undertaken with ESB to inform them about the proposed works. Liaison with ESB will continue at the detailed design and construction stages to ensure that the cable will be properly protected during construction.

With regard to submissions recommending relocation of the flood defence walls away from pitches and alternative design solutions to provide more space for the river habitat allowing for a simpler cantilevered section with steel railings, these proposals would not result in protecting the particular section of the Greenway from flooding.

- xvi. Traffic & user conflict - The objective of this facility is to provide a pedestrian and cycle link between Eglinton Road and Anglesea Road. It is unrealistic to expect that pedestrians or cyclists would forsake the use of this new facility for the existing more circuitous route, therefore this facility is being designed to accommodate both groups. To prevent pedestrians and cyclists being given an incorrect sense of dedicated space it is being proposed not to provide delineation or painted white lines. The design of the junctions will be part of the detailed design. Detailed consultation with stakeholders will be undertaken during steering group meetings to agree on best required design for the specific sections.

Planning Assessment:

The subject Part 8 is an amendment to a previously approved Part 8 for flood alleviation works along the River Dodder, Ref. 2504/13. These works are ongoing and are being carried out by the OPW on a phased basis. Phases 2C, from Lansdowne Railway Bridge to Ballsbridge, and 2D, From Ballsbridge to Anglesea Bridge (Donnybrook), are currently under construction.

Dublin City Council, with the support of the National Transport Authority, has also been developing proposals for a high quality walking cycling route along the river Dodder. This route is known as the Dodder Greenway project and would extend from Sir John Rogerson's Quay to the Dublin Mountains and pass through 3 administrative areas. The Dodder Greenway has been under design since 2015 and has involved the consideration of a number of routes as part of the process. On foot of this process the preferred route option was identified as a route along the western side of the sideration. The preferred route option

was identified as a route along the western bank of the River Dodder between Herbert Park and Anglesea Bridge (Donnybrook).

As the previously approved floor alleviation works are currently underway on some sections of the Dodder it is proposed to construct the section of the Greenway from Anglesea Bridge to Eglinton Terrace as part of the ongoing flood defence works along this section of the River Dodder.

There are three main advantages to this approach; firstly when completed, the works will provide a segregated pedestrian and cyclist link along the Dodder between Donnybrook Road and Herbert Park. It will open the riverbank up for public use and it would become a valuable amenity for recreational use. Secondly, it avoids any costly modifications to the flood defence works in order to provide the Greenway in the future, which would not only be costly but also disruptive to adjacent properties and to the ecology in the area. Lastly, it would ensure that a vital link in the overall Greenway is secured and constructed at an early stage.

Concerns raised in third party submissions relate to the design of the route and the Greenway infrastructure, environmental and ecological impacts on the existing riverbank, impacts on the surrounding development in terms of loss of privacy and boundary treatments, and traffic and safety concerns. The concerns raised have been addressed in detail within the report from the Environment and Transportation Department and have been summarised above.

In conclusion, the Greenway route as shown emerged as the preferred option as part of a design process which also considered alternative routes. The design of the Greenway between Anglesea Bridge and Eglinton Terrace was incorporated into the flood alleviation works and as such the project will function as a flood defence and a dedicated cycle and pedestrian route at this location. Access and egress arrangements for the Greenway will be subject to detailed design, as will lighting and landscaping, and will also involve stakeholder consultation. Environmental and ecological concerns have been and will be addressed by the consultants working with the design team.

There are a number of policies and objective that support the provision of the Greenway project and also seek to provide a safe environment for cyclists and pedestrians throughout the city. The delivery of the Greenway at this location will provide a segregated pedestrian and cycling link between Donnybrook Road and Herbert Park and will open up a previously inaccessible part of the Dodder for use as a recreational amenity.

Recommendation:

Accordingly, it is recommended that a decision be made by Elected Members of the Council to proceed with the proposed development.

The proposed development has been assessed and it is considered that it would be consistent with the Dublin City Development Plan 2016 – 2022 and with the proper planning and sustainable development of the area. Therefore, it is recommended that the proposed development should proceed subject to the following recommendations and considerations and subject to the requirements of the respective Divisions and Sections of the City Council provided below.

The proposed development shall be modified/adhere to the following:

1. Development shall not commence until a landscape scheme prepared by a qualified landscape architect ,comprising full details of the size, species and location of all trees and shrubs to be planted and the treatment of all external ground surfaces ,has been submitted to and agreed in writing by the Planning Authority and implemented in the first planting season following completion of the development, and any trees and shrubs which die or are removed within 3 years of planting shall be replaced in the following season (The landscape scheme shall have regard to the Guidelines for Open Space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

The landscape scheme shall also include the following:

- a. Existing trees & vegetation to be retained.
- b. Existing trees/vegetation to be removed.
- c. Proposed compensatory planting.
- d. Cross-sections
- e. Alignment of tree/vegetation protection fence.
- f. Proposed boundaries.
- g. Details of maintenance during the establishment period.

2. All trees & vegetation shown to be retained on the site and adjacent to the site, shall be adequately protected during the period of construction as per BS 5837, such measures to include a protection fence beyond the branch spread, with no construction work or storage carried out within the protective barrier. (The tree protection measures shall have regard to the Guidelines for Open space Development and Taking in Charge, copies of which are available from the Parks and Landscape Services Division).

3. Prior to commencement of works, the developer shall submit documentation prepared by a suitably qualified person stating whether any invasive species are located within the site. Where such species are identified, the developer shall submit details of proposals to safely remove the plant material which shall be agreed with Dublin City Council prior to any works on site.

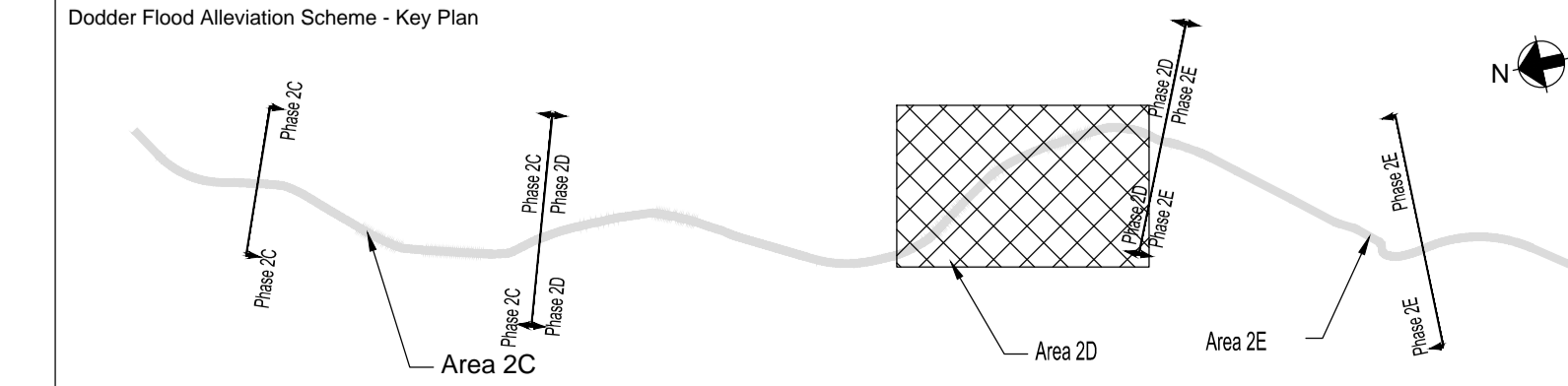
This report is submitted to the City Council pursuant to Section 138 of the Local Government Act, 2001 and Section 179 of the Planning and Development Act, 2000, subject to the provisions of Section 139 of the Local Government Act, 2001.

Owen Keegan
Chief Executive


23rd August 2017



LEGEND:
--- SITE BOUNDARY



Issue	Date	By	Chkd	Appd
P1	06/04/17	VB	BT	IA

Clients

Dublin City
 Baile Átha Cliath

DUBLIN CITY COUNCIL
 Comhairle Cathrach Bhaile Átha Cliath
 ENVIRONMENT AND ENGINEERING DEPARTMENT
 An Roinn Comhshaoil agus Innealtóireachta

Civic Offices,
 Wood Quay,
 Dublin 8.

Contractor
 Project Title
Donnybrook Greenway

Scale at A1 1:1000 @ A1
 Date: April 2017

Consultant

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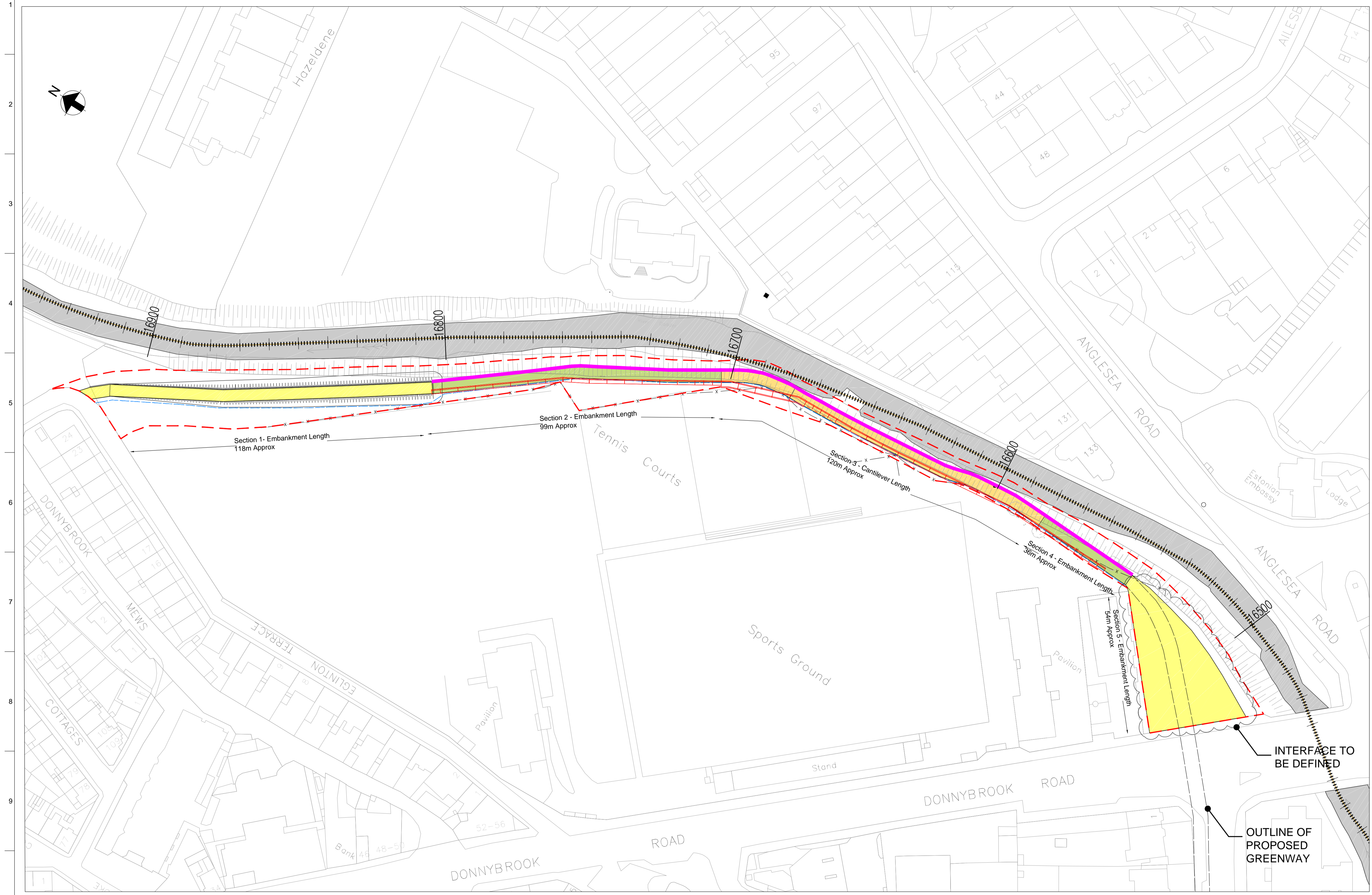
Drawing Title
**Area 2D - Donnybrook RFC
 Location Map**

Drawing Status
For Planning

Project No 253355	Drawing No D-DL-A-0001	Issue P1
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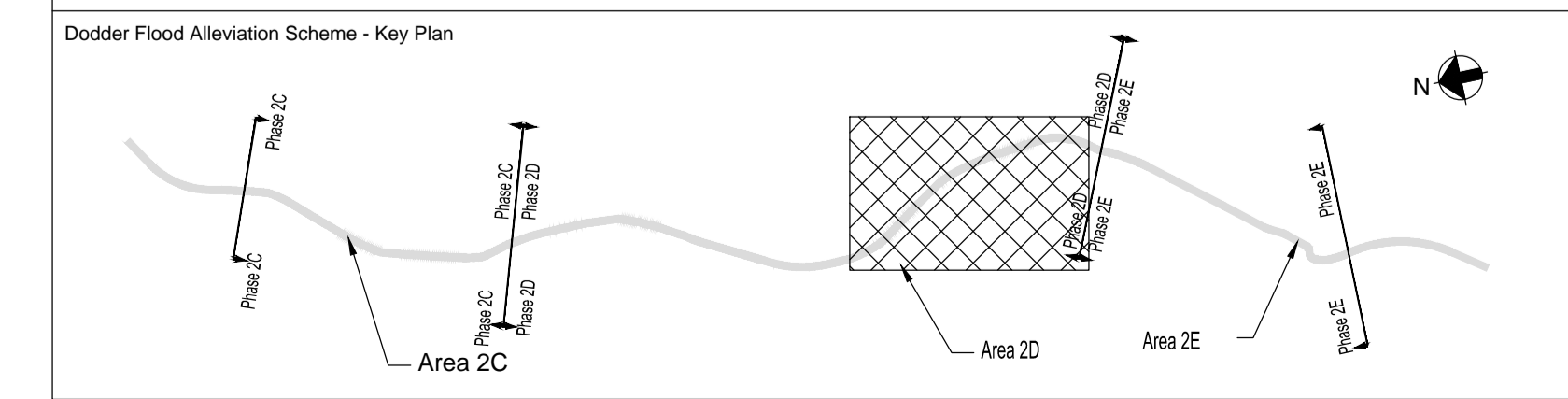
FOR PLANNING

NOTES:
1. ALL DIMENSIONS IN m UNLESS OTHERWISE NOTED.



LEGEND:

- SITE BOUNDARY
- EXISTING FENCE
- PROPOSED FENCE/SCREENING
- NEW FLOOD WALL
- ORIGINAL FLOOD WALL PROPOSAL
- EMBANKMENT WITHOUT WALL
- EMBANKMENT WITH WALL
- CONCRETE CANTILEVER WITH WALL



Issue	Date	By	Chkd	Appd
P1	06/04/17	VB	BT	IA

Clients

Dublin City Council
Comhairle Cathrach Bhaile Átha Cliath
ENVIRONMENT AND ENGINEERING DEPARTMENT
An Roinn Comhshaoil agus Innealtóireachta

Dublin City
Baile Átha Cliath

Civic Offices,
Wood Quay,
Dublin 8.

Contractor

Project Title
Donnybrook Greenway

Scale at A1
1:750 @ A1

Date: April 2017

Consultant

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Drawing Title
Area 2D - Donnybrook RFC
Proposed Plan Layout

Drawing Status
For Planning

Project No
253355

Drawing No
D-DL-A-0004

Issue
P1